

UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ORGANIC STANDARDS BOARD

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FALL 2018 PUBLIC COMMENT WEBINAR

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TUESDAY,
OCTOBER 16, 2018

The webinar was held via telephone at
1:00 p.m., Tom Chapman, NOSB Chair, presiding.

BOARD MEMBERS PRESENT

TOM CHAPMAN, Chair
HARRIET BEHAR, Vice Chair
SCOTT RICE, Secretary
JESSE BUIE
SUE BAIRD
ASA BRADMAN
A-DAE ROMERO-BRIONES

LISA DE LIMA

STEVE ELA

JAMES "RICK" GREENWOOD

DAVE MORTENSEN

EMILY OAKLEY

DAN SEITZ

ASHLEY SWAFFAR

STAFF PRESENT

DR. PAUL LEWIS, Ph.D., Director, Standards

Division, National Organic Program

MICHELLE ARSENAULT, Advisory Board Specialist,

National Organic Program

DEVON PATTILLO, Materials Specialist, Standards

Division, National Organic Program

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

2 1:00 p.m.

3 MS. ARSENAULT: Hi, everyone, welcome.

4 This is Michelle from NOP. My clock says 1:00
5 straight up, so I think we'll get started.

6 We're going to -- a little bit of
7 housekeeping at first. If you are on the line
8 with us, you should see an instruction slide.
9 Hopefully, everyone can see that. It says
10 welcome, and it talks a little bit about
11 ReadyTalk and how do dial in on the phone versus
12 using your headset.

13 If you're on your headset, just make
14 sure your mic is muted. We -- it's -- the reason
15 we get feedback on the line is when you're --
16 your mic is live and your speakers are on and you
17 can tell that I'm not technologically savvy
18 enough to explain that to you guys. If we get
19 feedback, we'll make an announcement and have
20 everyone check their lines there.

21 So noise is our biggest challenge.
22 It's much easier if we can have you guys self-

1 mute than if we have to mute and unmute the whole
2 group. So we'll ask that you do self-mute
3 yourself on the phone.

4 If you have -- you're on a phone that
5 doesn't have a mute button, you can hit star-6 to
6 mute yourself and star-7 to unmute.

7 All right, so as a participant on the
8 call, you should be able to -- you have some
9 limited functionality. You should see a chat box
10 and a raise your hand box.

11 We're asking people not to raise their
12 hand. If you are signed up to speak, then you'll
13 be called on when it's your turn, and we won't be
14 responding to any raised hands that aren't board
15 members.

16 So Tom is going to run through some
17 logistics with regard to the timer, but we are
18 using a timer to limit people's comments to three
19 minutes, and we'll demonstrate that for you in a
20 little bit so everyone can hear what it sounds
21 like on the phone.

22 And if you're having any technical

1 problems, ReadyTalk has a really good customer
2 service line. If you go to readytalk.com, you'll
3 see a phone number, you can call them, and
4 they're usually really quick about getting you
5 fixed up.

6 All right, I'm going to turn it over
7 to Paul Lewis now to actually officially open the
8 October 2018 NOSB meeting public comment webinar.

9 DIRECTOR LEWIS: Thank you, Michelle,
10 and good afternoon. I am Paul Lewis, Director of
11 Standards Division of the National Organic
12 Program.

13 I want to welcome NOSB members and the
14 public to today's National Organic Standards
15 Board Public Comment Webinar, and I appreciate
16 the NOSB members' participation in this call and
17 for all your work serving on the Board.

18 This webinar provides the opportunity
19 for the public to provide comments to the Board
20 as part of the upcoming face-to-face public
21 meeting scheduled for October 24th through 26th
22 in St. Paul, Minnesota. Please consult the NOP

1 website for further information about the face-
2 to-face meeting.

3 The meeting that we're having today,
4 just like the meeting we'll be having later on
5 this week is another public comment webinar, and
6 the meeting next week in St. Paul all operate
7 under the provisions of the Federal Advisory
8 Committee Act.

9 And I am looking forward to hearing
10 comments from the public today and Thursday and
11 at our meeting next week to assist the Board in
12 preparing their recommendations to USDA in
13 response to National Organic Standards Board
14 board agenda items.

15 I also want to personally thank my
16 colleagues here in the NOP Standards Division for
17 their help behind the scenes to bring you today's
18 teleconference.

19 I'd like to close now by turning to
20 Chair, Mr. Tom Chapman, Chair of the NOSB. Tom,
21 thank you for leading this webinar today.

22 CHAIRPERSON CHAPMAN: Thank you, Paul,

1 and thanks to the NOP staff, particularly
2 Michelle and Deb, for helping accommodate this
3 webinar.

4 On behalf of the Board, I'd like to
5 welcome everyone to the public comment webinar
6 prior to our fall meeting. Public comment is a
7 vital part of the NOSB process, and I appreciate
8 all folks who have spent their time getting us
9 their thoughts.

10 Michelle, if you'd be so kind to take
11 roll of the -- a roll call of the Board members
12 present?

13 MS. ARSENAULT: Thanks, Tom.

14 Tom Chapman?

15 CHAIRPERSON CHAPMAN: Present.

16 MS. ARSENAULT: Harriet Behar?

17 MEMBER BEHAR: Present.

18 MS. ARSENAULT: Great. Scott Rice?

19 MEMBER RICE: Present.

20 MS. ARSENAULT: Thank you, sir. Jesse
21 Buie?

22 MEMBER BUIE: Present.

1 MS. ARSENAULT: Thanks, Jesse.

2 Sue Baird? Sue, if you're talking,
3 you're on mute. I see you on the line.

4 MEMBER BAIRD: Present.

5 MS. ARSENAULT: Okay, thanks, got it,
6 thank you. Asa Bradman?

7 MEMBER BRADMAN: Present, I may leave
8 about two minutes early to go to a class.

9 MS. ARSENAULT: Thanks, Asa.

10 Lisa de Lima?

11 MEMBER DE LIMA: Here.

12 MS. ARSENAULT: Hi, Lisa, thank you.

13 Steve Ela?

14 MEMBER ELA: Present.

15 MS. ARSENAULT: Great. I'm going to
16 interrupt myself here and ask that if you are not
17 speaking to please mute yourself, we're getting
18 some beeping noises.

19 Dave Mortensen?

20 MEMBER MORTENSEN: Present.

21 MS. ARSENAULT: Hi, Dave.

22 Emily Oakley?

1 MEMBER OAKLEY: Present.

2 MS. ARSENAULT: Hi, Emily.

3 A-dae Briones? A-dae, did you --

4 MEMBER ROMERO-BRIONES: Present.

5 MS. ARSENAULT: Excellent, you were

6 able to join. Thank you.

7 Eric Schwartz?

8 MEMBER SCHWARTZ: Present, Michelle.

9 MS. ARSENAULT: Thank you.

10 And Ashley Swaffar?

11 MEMBER SWAFFAR: I'm here.

12 MS. ARSENAULT: Hello there.

13 And I'm just going to check, Dan

14 Seitz, were you able to join?

15 Okay, Dan, is going to join us a

16 little bit late today. And Rick Greenwood is not

17 able to be with us today, so he won't be on the

18 call. So we have 13 of the 15 Board members with

19 us on the call at the moment. All right.

20 CHAIRPERSON CHAPMAN: Thank you,

21 Michelle.

22 MS. ARSENAULT: Thanks, Tom.

1 CHAIRPERSON CHAPMAN: There are 13 of
2 15, that's a quorum, and we'll look to have Dan
3 join us a little bit later. So, next, I have
4 some logistical items to go over and then we'll
5 get into the public comment time.

6 First off, like Michelle has mentioned
7 already, please keep yourself on mute. If folks
8 individually mute themselves, it's usually easier
9 than muting across the board. We often get some
10 background noise if people are using a speaker
11 phone or their computer. So please keep that in
12 mind as well.

13 Star-6 to mute, star-7 to unmute.

14 We'll start public comments in the
15 order of the list that Michelle has provided for
16 the commenters. If a commenter is not present at
17 the time we call upon them, we'll skip them but
18 come back to them at the end as time permits.

19 We will call on the next speaker -- I
20 will call out the name of the next speaker who is
21 up as well as the next one or two names on deck.

22 The program and I try to ID the

1 commenters via the phone number you've provided
2 prior to make sure the speaker is present. If I
3 cannot ID a phone number, you might hear me ask
4 you to comment into the staff so that we can find
5 your phone number.

6 When called upon to speak, we ask the
7 speaker to give their name and relevant
8 affiliation for the record. We ask that you
9 disclose all relevant affiliations pertaining to
10 matters of business before the Board. If members
11 of the NOSB want further clarification, I
12 encourage you to ask questions after the public
13 commenter has finished their comments.

14 Comment time will be three minutes per
15 commenter. After that three minutes, a buzzer
16 will go off.

17 Michelle, are you able to play an
18 example of that buzzer?

19 MS. ARSENAULT: Indeed, here we go.

20 CHAIRPERSON CHAPMAN: There you go.

21 MS. ARSENAULT: Is that okay?

22 CHAIRPERSON CHAPMAN: -- the buzzer,

1 out of respect for the Board and other
2 commenters, I ask that you try to finish as close
3 to that three minute mark as possible or when you
4 hear the buzzer.

5 I will then facilitate questions at
6 that point from the Board, if there's any of
7 them. And then after that's completed, we'll
8 move to the next commenter.

9 We don't take questions from the
10 public for other public commenters, only
11 questions from the Board. Board members, if you
12 have a question, either speak up when I ask if
13 you have questions or message me via the message
14 box.

15 Keep public -- all public commenters
16 are allotted only one time slot either in person
17 or at the webinars. And there will be a
18 transcript of these calls after the entire
19 meeting bundled together with the meeting
20 transcripts.

21 Michelle, did I miss anything?

22 MS. ARSENAULT: No, I think you

1 covered everything, Tom, thanks.

2 CHAIRPERSON CHAPMAN: Okay. We are
3 still getting a lot of feedback from folks, so,
4 again, if people could self-mute, that would
5 great.

6 And we'll get started. So first up we
7 have Amalie Lipstreu followed by Harold Austin
8 and then Percy Hawkes.

9 Amalie, are you on the line with us?

10 MS. LIPSTREU: Yes, I am. Can you
11 hear me okay?

12 CHAIRPERSON CHAPMAN: Yes, we can. If
13 you'd start with your name and affiliation for
14 the record and then proceed with your comment?

15 MS. LIPSTREU: Good afternoon, this is
16 Amalie Lipstreu. I'm the Policy Coordinator for
17 the Ohio Ecological Food and Farm Association.
18 Thank you for the opportunity to share our input
19 in an open forum.

20 OEFFA has provided oral and written
21 comments on energy infrastructure impacts to
22 organic farms for several years.

1 To be perfectly clear, we are talking
2 about prohibited substances being used during
3 construction and operation of energy
4 infrastructure. Many farmers and certifiers
5 aren't aware of the use of prohibited substances
6 and processes that can put certified organic
7 production in jeopardy.

8 OEFFA approaches this subject with
9 abundance of caution as we hold the integrity of
10 the National Organics program paramount.

11 The NOSB and the NOP have the choice
12 of being proactive or reactive on this issue.
13 But the reality is these impacts will make
14 themselves known when farms being decertified,
15 noncompliance is a media story.

16 Please add a study of energy system
17 infrastructure on organic farms to the NOSB work
18 agenda.

19 Regarding the proposal on genetic
20 integrity transparency of food grown on organic
21 land, we appreciate the efforts of the Board to
22 begin looking at levels of contamination starting

1 with organic corn seed. We heard from many
2 producers that will no longer grow food grade
3 organic corn due to the difficulties in
4 maintaining purity of products from seed to
5 delivery. An ability to maintain organic
6 integrity to ensure next production and supply
7 should not be a limiting factor.

8 Also, with regard to testing, the
9 equivalence of in-house and PCR testing is not
10 certain. Many of our growers that have used non-
11 PCR tests have had loads rejected, and companies
12 that use PCR find levels of contamination that
13 are higher than the on-farm testing indicated.

14 The issue of GE contamination at many
15 levels has been longstanding, and our farmers are
16 looking for solutions. But as the proposal moves
17 forward, please consider the feasibility of
18 what's being asked of organic producers.

19 The social, financial and
20 environmental challenges, especially for organic
21 grain farmers, many of whom are an island within
22 a sea of conventional agriculture, are

1 considerable, and we must take great pains to
2 ensure that we do not add an inordinate burden
3 and responsibility on them.

4 Thank you.

5 CHAIRPERSON CHAPMAN: Thank you. Any
6 questions from the Board?

7 MEMBER BEHAR: Yes, this is Harriet.

8 CHAIRPERSON CHAPMAN: Go ahead,
9 Harriet.

10 MEMBER BEHAR: Hi, Amalie. I'm
11 wondering, so do you feel that the proposal on
12 genetic integrity is implementable as written?

13 MS. LIPSTREU: We feel very strongly
14 that it should move forward because it has been
15 such a longstanding issue. We do hope that some
16 of the matters are addressed just as I have spoke
17 to the equivalence of testing, some of the
18 financial burden, and training for conducting
19 those tests be considered as the proposal does
20 move forward.

21 MEMBER BEHAR: Okay, I think at the in
22 person meeting, I'll be able to answer some of

1 those questions.

2 MS. LIPSTREU: Great, thank you.

3 MEMBER BEHAR: And then on the
4 infrastructure -- Tom, can I ask another
5 question?

6 CHAIRPERSON CHAPMAN: Yes.

7 MEMBER BEHAR: So I am just wondering,
8 in the work plan, to help us figure out how this
9 would work, would this also include some sort of
10 testing protocol for inputs, water and the
11 contaminants those might have, as well as the
12 mitigation plan, which I know you've spoken
13 about? Are you looking at kind of a two-pronged
14 effort here?

15 MS. LIPSTREU: Sure, thanks for the
16 question, Harriet. And, no, I would not project
17 about testing of water or anything of the like at
18 this point. We really feel what would be best
19 would be to start with a discussion document,
20 invite a panel of experts to break down the issue
21 and develop a better understanding of what the
22 most burning issues are and what issues really

1 are within the scope of the Board to be able to
2 address and then move forward from there.

3 And I would say that this mitigation
4 plan, as I've said previously, it has been
5 implemented successfully with not just the
6 producers we work with, but with the Federal
7 Energy Regulatory Commission, as well as some of
8 the pipeline companies.

9 So it really is a tool that's worth
10 taking a look at and considering how that might
11 be used proactively. Does that answer your
12 question?

13 MEMBER BEHAR: Yes, thank you.

14 MS. LIPSTREU: Thank you.

15 CHAIRPERSON CHAPMAN: Any other
16 questions?

17 MEMBER RICE: -- Scott.

18 CHAIRPERSON CHAPMAN: Yes, Scott.

19 MEMBER RICE: Hi, Amalie, thanks for
20 your comments, and we, as you know, have been
21 discussing the impacts of the extraction
22 activities. I just wonder, back to sort of

1 scoping what a work plan item or product would
2 look like, you mentioned, you know, a discussion
3 document and the panel of experts.

4 But do you -- what is your -- what
5 would you see as your ideal result of that work?
6 What would the end product from NOSB look like?

7 MS. LIPSTREU: Thank you, again.

8 Well, I think, ideally, we would see some kind of
9 guidance or instruction developed by the NOP that
10 would provide some resources that could be shared
11 with certifiers who could also share those
12 resources with producers.

13 One of the things that we've come to
14 realize over the past several years of working on
15 this issue is the critical nature of everyone
16 having as complete information as possible as
17 early on in the process as possible so that, you
18 know, as many mitigation measures can be put in
19 place that protect farmers and their resource
20 base they depend on.

21 MEMBER RICE: Thank you.

22 MS. LIPSTREU: Thank you.

1 CHAIRPERSON CHAPMAN: Any other
2 questions?

3 Hearing none, thank you for your time,
4 and we'll go on to the next commenter, Harold
5 Austin, followed by Percy and then Ted Auch. Ted
6 Auch, if you're on the line please comment in
7 because we haven't identified your phone number
8 yet.

9 Harold, if you can start with your
10 name and affiliation please?

11 MR. AUSTIN: Thank you, Tom. Harold
12 Austin, past member of the NOSB, an organic
13 consumer, and the current Chair of the Northwest
14 Hort Council's Organic Subcommittee.

15 Good day. First, I'd like to thank
16 all of the members of the NOSB for your service
17 on behalf on our organic community and the
18 various stakeholders that each of you represent.
19 This can be very time consuming, so I truly
20 appreciate all that you do on our behalf.

21 I support the sunset materials
22 currently under review and up for vote as

1 presented by the Crop Subcommittee. Please see
2 my written comments for specific detail.

3 I also support the position of the
4 Crop Subcommittee on the proposals with the
5 exception of allyl isothiocyanate. I think
6 adding this material to the National List would
7 be of assistance to organic growers for coming
8 into compliance with federal and state
9 phytosanitary requirements for nursery stock
10 which currently can only be accomplished by the
11 use of substances not currently allowed for use
12 in organic crop production.

13 In reading other public comments, I
14 fully support the comments on this material that
15 were submitted by the Organic Produce Wholesalers
16 Coalition. They framed this very well.

17 As a past Chair of the Handling
18 Subcommittee, I support all of the sunset
19 materials currently under review and up to the
20 subsequent vote as presented by the Handling
21 Subcommittee.

22 These are materials that I've been

1 involved with for previous sunset reviews, and I
2 see absolutely no reason why they should not
3 continue to be allowed as currently listed on the
4 National List because the majority of them are
5 still quite necessary for organic handlers.

6 I especially want to thank and comment
7 and let you know how much I appreciate the hard
8 work of this Subcommittee.

9 Materials Subcommittee, a couple
10 things to mention. First, regarding the marine
11 materials discussion document, this is a complex
12 subject, and I appreciate the hard work put in to
13 it thus far by the Subcommittee. However, this
14 is in no way ready for prime time nor do I think
15 it will be any time in the near future.

16 As an organic community, we must find
17 a way to farm in a true sustainable fashion while
18 at the same time protecting and/or enhancing the
19 environment and our natural resources each and
20 every day. This document, while it frames some
21 of the concerns, I feel it creates more questions
22 than provides answers.

1 And, thus, I urge caution as you try
2 to move this very complex issue forward. I would
3 support the formation of a working group to look
4 at this issue. I also question if the NOP is
5 actually the appropriate governmental agency to
6 provide oversight for such a process. I would
7 ask the NOP and the USDA to weigh in on that.

8 Secondly, I question the need for the
9 proposed work agenda item for sanitizers. I do
10 not see a valid rationale for this to be included
11 in the Subcommittee work plan as an action item.
12 Each material is currently listed for a specific
13 use for each of the appropriate Subcommittees.

14 The need, the use, the necessity will
15 vary for each material. And if they're lumped
16 into a single category, seems pointless,
17 especially when there are so many other things
18 that you, the members of the NOSB, could be
19 spending your time on.

20 No one on any of the Subcommittees
21 will be able to truly frame all of the variables
22 that an organic handler or producer must take

1 into consideration.

2 Thank you.

3 CHAIRPERSON CHAPMAN: Thank you. Any
4 questions for Harold?

5 (Simultaneous speaking.)

6 MEMBER ELA: Tom, I have one -- go
7 ahead, Emily.

8 MEMBER OAKLEY: Sorry.

9 Thank you, Harold, for your comments.
10 And I wanted to ask you specifically in regards
11 to marine materials, we found a very difficult
12 time in identifying an internationally recognized
13 and agreed-upon definition of sustainability or
14 something similar in terms of harvest of marine
15 materials. And I was wondering if you had any
16 specific suggestions or knew of any other avenues
17 that you would -- that we pursue as we try to
18 address environmental concerns of those
19 materials? Thank you.

20 MR. AUSTIN: Thanks, Emily. You know,
21 that's a difficult question that you're trying to
22 take and figure out the scope of. As you know,

1 while I was still on the Board, we looked at the
2 marine materials and the classifications and
3 sustainability.

4 And, likewise, what you're now
5 encountering, we also encountered at that time,
6 the extreme difficulty by nature of what this
7 encompasses. And that's why I question how to
8 move it forward. It's going to be an extremely
9 complex process, and this is a difficult topic.

10 And we know there's environmental
11 concerns. We also know that there's concerns by
12 the organic stakeholders that rely on these
13 materials. And how do we frame that? What does
14 that look like?

15 That's where I think stepping back,
16 forming a committee, a working group to look at
17 all of the specifics, to analyze and to go out
18 and research that very -- the scope of what you
19 just posed I think makes the best sense.

20 Take the time, make sure that, as you
21 take the approach to it, that we're looking at
22 environmental concerns. We're also looking at

1 the feasibility of this and also the impact on
2 the organic stakeholders as well. I hope that
3 helps.

4 MEMBER OAKLEY: Yes, thank you. Is it
5 okay to do a quick follow up, Tom?

6 CHAIRPERSON CHAPMAN: Yes.

7 MEMBER OAKLEY: Do you feel that using
8 the wildcraft standard for organic certification
9 would not adequately address environmental
10 concerns? Or what is your concern about applying
11 that standard to address the environmental
12 issues? And that's my last question. Sorry,
13 thanks.

14 MR. AUSTIN: You know, I don't know if
15 I can give you a full answer on that, Emily. I
16 think that's where having a working group really
17 look at having that apply to this.

18 What are the impacts? What does it
19 cover well? What doesn't it cover well? What
20 are the other issues that that might take and
21 bring into play?

22 So I think really taking and having a

1 working group that can really dig into the weeds
2 on this, so to speak, I think behooves us all to
3 take a step back, be a little bit cautious about
4 it, because this is going to have an impact. We
5 definitely want something that's sustainable. We
6 want something that's going to protect the
7 environment.

8 But I think putting together a working
9 group of the various different perspectives,
10 different agencies, different, you know,
11 consumers, environmentalists, organic stakeholders
12 that use these materials, looking at all the
13 impact that this is going to have. Because this
14 covers such a tremendous scope, I just urge
15 caution as you move forward with it.

16 CHAIRPERSON CHAPMAN: Other questions
17 for Harold?

18 MEMBER ELA: Tom, this is Steve, I had
19 a question.

20 CHAIRPERSON CHAPMAN: Steve, go ahead.

21 MEMBER ELA: Harold, just wanted to
22 follow up on your comments on AITC and your

1 recommendation that we move forward with that.

2 Could you expand a little more on
3 that? Because we're certainly wrestling with its
4 application, I mean, not being all that different
5 from other broad spectrum fumigants and such
6 versus, you know, it's not -- it's a little more
7 specific and a little more potentially
8 appropriate for organic.

9 So I'd like to hear a little more
10 detailed thoughts on that from you.

11 MR. AUSTIN: Cool, yes, Steve. I
12 think compared to the other materials that we
13 have on a conventional side, which we know, I
14 mean, essentially, we're coming in and we're
15 fumigating, you're sterilizing the soil, you
16 know, for the planting stocks.

17 But there are phytosanitary
18 requirements that we have to meet in order to
19 take and provide -- be able to provide those
20 planting stocks to the grower.

21 Organically, you know, pretty much, we
22 have to take and look aggressively at

1 conventional stock rather than organic supplied
2 stock, especially when we're dealing with like --
3 crops -- tree fruits, specifically.

4 I think utilizing this material, we
5 could take it and give something that's very
6 close to the natural sources, but we can use it
7 in a more confined, more defined application
8 technique. You know, we've all dealt with, a lot
9 of us, with the mustard seeds, the natural, the
10 mustard plants, working them in. That
11 encompasses broad spectrum.

12 Where on this specific, we could
13 utilize this material because it hits site
14 specific so that we're minimizing the impact that
15 it might be having on a broad spectrum. So I
16 think there's a lot more benefit if we have this
17 material, especially when we're dealing with
18 planting stock, wood stock, for phytosanitary --
19 to meet the phytosanitary requirements that we're
20 trying to accomplish.

21 I think it give the organic community
22 a tool that they could use, and we could provide

1 -- and we could begin to provide those planting
2 stocks from an organic source rather than a
3 conventional source.

4 MEMBER ELA: As a follow up to that,
5 Harold, would you then be in favor of an
6 annotation that would restrict it to planting
7 stock versus other more widespread use?

8 MR. AUSTIN: I wouldn't be opposed to
9 that at all.

10 MEMBER ELA: Thank you.

11 MR. AUSTIN: Thanks, Steve.

12 CHAIRPERSON CHAPMAN: Other questions
13 for Harold?

14 Okay, thank you, Harold.

15 Up next, we have Percy followed by
16 Ted. Ted, we still haven't located your phone
17 number, so please comment in if you're here. And
18 after Ted, Julia Barton, you're on deck.

19 Percy, if you could start with your
20 name and affiliation?

21 MR. HAWKES: Yes, can you hear me?

22 CHAIRPERSON CHAPMAN: Yes, we can.

1 MR. HAWKES: Okay, yes, this is Percy
2 Hawkes, and I'm the Regulatory Affairs Specialist
3 for Protena International, and we are petitioning
4 that sodium citrate be included on the list of
5 synthetic substances allowed for use in organic
6 crop production.

7 Sodium citrate is commonly used as an
8 anticoagulant to facilitate the processing and
9 handling of blood collected in slaughterhouses.
10 And it acts as a chelating agent in fresh blood,
11 the citric ion binding with and removing calcium
12 ions which are needed to coagulate blood.

13 Sodium citrate is the anticoagulant of
14 choice for the following seven reasons. First,
15 it is made from citric acid which is easy to
16 manufacture resulting from the fermentation of
17 organic starch components and the addition of
18 sodium hydroxide or sodium monohydrate.

19 Second, sodium citrate and its
20 precursor, citric acid, are widely used in the
21 food industry with many uses already approved in
22 the production of organic food products.

1 Third, sodium citrate is one of the
2 three USDA-approved anticoagulants for processing
3 slaughterhouse blood. The other two are citric
4 acid and sodium tripolyphosphate.

5 Fourth, sodium citrate is the most
6 readily available anticoagulant for handling
7 slaughterhouse blood.

8 Fifth, food grade sodium citrate is
9 not known to have any negative effects on the
10 environment nor on human or animal health. It is
11 rapidly degraded in the soil and is free of heavy
12 metals.

13 Sixth, sodium citrate used as an
14 anticoagulant produces a more uniform and quality
15 product than the alternative method of mixing the
16 blood with agitators. Agitators or mixers cause
17 hemolysis of the red blood cells and the
18 formation of fibrin residue, ruling out its use
19 in further processing blood byproducts.

20 And, seventh, citric acid is already
21 approved as a processing aid to lower the pH of
22 liquid fish organic fertilizer. And by lowering

1 the pH, it forms citrate salts.

2 Therefore, sodium citrate becomes one
3 of the ingredients in organic liquid fish
4 fertilizer resulting from the use of citric acid
5 to adjust the pH. We believe that sodium citrate
6 should be approved as a processing aid,
7 anticoagulant for organic blood derivative
8 fertilizers. Thank you.

9 CHAIRPERSON CHAPMAN: Thank you. Any
10 questions for Percy?

11 MEMBER BEHAR: Tom, this is Harriet.

12 CHAIRPERSON CHAPMAN: Yes, go ahead.

13 MEMBER BEHAR: Would you say that the
14 vast majority of dried blood meal is -- has
15 sodium citrate in it now?

16 MR. HAWKES: Yes, that is the
17 anticoagulant of choice that basically all
18 slaughterhouses that process blood use.

19 MEMBER BEHAR: And one other question.
20 Did you have a certifier tell you that blood meal
21 would not be allowed if you had used the sodium
22 citrate as the anticoagulant? Is that what

1 precipitated this petition?

2 MR. HAWKES: Yes, we assumed that we
3 had to get sodium citrate approved as an
4 ingredient just as it has to be approved by other
5 countries. Does that answer your question, or am
6 I missing the question?

7 MEMBER BEHAR: I know that blood meal
8 has been allowed without that review of the
9 processing aid of sodium citrate in the past, so
10 I was just wondering if you had a certifier tell
11 you that they would no longer allow blood meal as
12 a natural product because of the presence of the
13 sodium citrate, the small amount of residual.

14 MR. HAWKES: Well, some blood meal is
15 just processed from raw blood directly. And
16 other -- other plants that process plasma and
17 hemoglobin use the hemoglobin portion as a blood
18 derivative organic fertilizer.

19 So I guess my previous answer, you
20 asked if all blood meal has sodium citrate, if
21 they process plasma, yes, it will have sodium
22 citrate in the hemoglobin portion as well as the

1 plasma portion.

2 If they don't -- if they just use raw
3 blood that is not -- does not have -- does not
4 need to have anticoagulant because they don't
5 process plasma, then it wouldn't have the sodium
6 citrate. Does that answer the question?

7 MEMBER BEHAR: Yes. You did mention
8 that overseas that you've been asked to have this
9 approved by other governmental organic oversight
10 agencies, is that correct?

11 MR. HAWKES: Yes, we are not aware
12 that it's approved.

13 MEMBER BEHAR: Okay.

14 MR. HAWKES: Could you give me the --
15 I guess I need the reference of what you're
16 referring to. I mean, we know blood meal is
17 approved, but is blood meal that contains sodium
18 citrate approved? We were told that it was not,
19 that it would have to be approved, and that's
20 part of the process that we had to go through at
21 your request.

22 MEMBER BEHAR: Okay, thank you.

1 CHAIRPERSON CHAPMAN: Any other
2 questions for Percy?

3 All right, thank you, Percy.

4 Up next, we have Ted Auch followed by
5 Julia Barton and Doug Raubenolt.

6 Ted, are you here?

7 MR. AUCH: Can you hear me?

8 CHAIRPERSON CHAPMAN: Yes, you're a
9 little light, Ted, but we can hear you. If you
10 could start with your name and affiliation for
11 the record?

12 MR. AUCH: Sure, my name is Ted Auch.
13 I work with a nonprofit called The FracTracker
14 Alliance -- work in Cleveland, Ohio and I also
15 teach adjunct -- environmental science -- and the
16 reason that I'm on this phone call is, well, I'm
17 a recovering soil scientist, that's what I have
18 my PhD in, but it's been a while since I've got
19 my hands dirty in the soil science profession.

20 But, at the nonprofit that I work at,
21 FracTracker, we do a lot of work analyzing and
22 looking at the impacts of unconventional oil and

1 gas production processing and transport and that
2 kind of thing.

3 And, we do a lot of mapping of this
4 industry, the unconventional oil and gas industry
5 with respect to their water impact, their waste
6 impact and their land use impact.

7 And I was talking to Amalie Lipstreu
8 at Ohio Ecological Food and Farm, and she
9 suggested I get on this call, and the only thing
10 that I'd really like to add to this phone call is
11 I've talked to a lot of people, a lot of organic
12 farmers, whether it's Tony Driac up in Jackson
13 County, Wisconsin or some other folks who I've
14 met here in Ohio.

15 And what I'd like to stress on this
16 phone call is that this -- your organization,
17 it's critical that you pay attention to and
18 really get a sense for the magnitude of
19 unconventional oil and gas development in the
20 United States and really broaden what -- how you
21 define that and its impact on your constituents.

22 Because, what the oil and gas industry

1 has been really good at doing in my six years of
2 looking at them is constraining how we define
3 fracking, what we define as fracking to the well
4 pads in North Dakota, Pennsylvania and Ohio.

5 But this is an organism spread out
6 across the United States, and it's having a
7 dramatic impact on the landscape, on watershed --
8 on surface water, subsurface waters, hydrologic
9 cycles, and it has everything from there's --
10 it's having impacts whether it's the sand mines
11 up in Wisconsin and their impacts on dairy
12 farmers and beet farmers, or it's an injection
13 well in Ashtabula County, Ohio, which is having
14 an incredible impact on small farmers in that
15 county and everything in between.

16 I think that -- I think it's important
17 -- it's just critical that everyone understands
18 that fracking includes a tremendous amount of
19 infrastructure, a tremendous amount of transport
20 of stuff, whether it's brine hauling or sand
21 movement or whatever the case may be. And all of
22 that is going to trickle back down into the

1 people that are on this phone call.

2 And we've mapped that impact, the
3 potential impact of these -- the full
4 exploitation of these shale plates across the
5 United States, and you can find that at our
6 website, www.fracktracker.org.

7 We've worked on that project, mapping
8 the potential impact on the agricultural sector
9 in the United States, organic and otherwise.

10 So I just wanted to kind of give my
11 two cents as to what I've seen on this topic and
12 just convey to the audience on this call that
13 fracking is having a quiet and a very loud impact
14 on farming when we really understand that this is
15 not just a well pad, there's all sorts of other
16 stuff going on.

17 So that's all I kind of have to
18 contribute.

19 CHAIRPERSON CHAPMAN: Thank you, Ted.

20 MR. AUCH: Sure.

21 CHAIRPERSON CHAPMAN: Any questions
22 for Ted from the Board?

1 All right, Ted, I'm not seeing any
2 questions or hearing any. Thank you for your
3 time today.

4 MR. AUCH: Sure.

5 CHAIRPERSON CHAPMAN: Up next we have
6 Julia Barton, followed by Doug and then Jo Ann
7 Baumgartner.

8 Julia, if you could start with your
9 name and affiliation for the record?

10 MS. BARTON: Yes, can you hear me?

11 CHAIRPERSON CHAPMAN: Yes, I can.

12 MS. BARTON: Okay, thank you.

13 Good afternoon, my name is Julia
14 Barton with the Ohio Ecological Food and Farm
15 Association. Thank you to the Board for your
16 service, to the program for your work, and for
17 the opportunity to offer public comment over the
18 phone.

19 You heard just now from my colleagues
20 Amalie Lipstreu, Ted Auch and from 32
21 organizations in a group letter submitted to the
22 docket regarding our ongoing request to the Board

1 and the program to please add the topic of energy
2 infrastructure development on organic farms to
3 the work agenda.

4 It sounds like from your questions to
5 Amalie that you may be considering how to scope
6 such an agenda item. To fuel that conversation,
7 we have several real-life examples, some of which
8 we've shared over time of organic farmers
9 impacted by this development.

10 This development, we know, is not
11 going away, so we think it's important to work
12 together to add consistency and transparency to
13 the way we understand and address this issue in
14 the organic realm.

15 As an example, from a certifier
16 perspective, we at OEFFA have identified some
17 prohibited substances that are commonly used in
18 pipeline construction, foam breakers which are
19 used as soil bands in the trench to hold up and
20 stabilize the pipes and are buried in the trench
21 right along with the pipe when construction is
22 finished, are one example of a prohibited

1 substance.

2 Similarly, foam balls consisting of
3 prohibited materials are used on sloping land to
4 prevent gullies which could destabilize the
5 pipes. Another commonly used material called
6 Black Magic is a sand which sounds innocuous
7 enough, in the sand blasting guns. It contains,
8 however, acrylic and recycled glass material.
9 This material is used because the pipes come off
10 the pipe yard with paint on them and the
11 contractors have to blast that coating off to
12 then weld and put a latex rubberized coating over
13 the pipes to connect the pipes together to move
14 the gas around.

15 OEFFA requires that the welding area
16 must be blanketed in order to prevent the
17 material from contaminating the soil. The
18 application of these prohibited materials would
19 require an OEFFA certified farm to retransition
20 which leads us to the experience of the producer.

21 If, say, the producer did not engage
22 in an ag impact mitigation plan, I should note

1 ahead of construction or if, say, that plan was
2 not followed, then they're in a situation of de-
3 certification and the need for retransitioning.

4 So the producer is then left to figure
5 out how to, for example, meet dry matter demand
6 or manage a pasture rotation requiring them to
7 repeatedly cross a pipeline strip that's 100 feet
8 wide that's in transition and make sure the cows
9 don't eat anything out of that strip that's being
10 retransitioned while they're moving back and
11 forth.

12 Maybe they need to get to the parlor
13 or access water or shade that's not accessible in
14 the pasture that they're grazing that day as part
15 of a rotational grazing system. So this gets
16 complicated from producer perspectives, too,
17 which is another reason we're requesting the
18 Board's help.

19 Finally, the inspectors are being
20 forced to handle these situations differently
21 according to the policies or lack thereof of
22 various certifiers. This is an untenable

1 position for inspectors, and you'll be hearing
2 from one of OEFFA's best inspectors, and most
3 experienced in this arena, here in just a moment.

4 Thank you for your time.

5 CHAIRPERSON CHAPMAN: Thank you,
6 Julia. Any questions for Julia?

7 I'm hearing and seeing none, so we'll
8 move along. Thank you, Julia, for your time.

9 MS. BARTON: Thank you.

10 CHAIRPERSON CHAPMAN: Up next is Doug,
11 followed by Jo Ann Baumgartner and then Corellia
12 Johnson.

13 Doug, are you on the line with us?
14 Doug, are you there? If you're speaking, you are
15 on mute.

16 MS. ARSENAULT: I just unmuted him,
17 Tom. So, Doug, can you hear us? Can you talk?
18 Say something so we know you're unmuted.

19 MR. RAUBENOLT: Yes, I'm here now.
20 Can you hear me now?

21 CHAIRPERSON CHAPMAN: Okay, Doug, we
22 hear you.

1 MR. RAUBENOLT: Okay.

2 CHAIRPERSON CHAPMAN: If you could
3 start with your name and affiliation for the
4 record?

5 MR. RAUBENOLT: Yes, my name is Doug
6 Raubenolt. I'm an IOIA-accredited inspector from
7 Ohio. I've been an organic inspector for 13
8 years and have performed inspections in 24 states
9 for six different certifiers.

10 Most everybody knows that Eastern Ohio
11 and Western Pennsylvania are in the middle of an
12 oil and natural gas boom which has now led to
13 huge pipeline construction projects dissecting
14 both states, and many organic farms are located
15 in their pathway.

16 Organic farmers have been given the
17 option through mitigation agreements to have all
18 pipeline construction activities monitored by an
19 on-site IOIA-accredited organic inspector to
20 ensure their farm's organic status remains
21 intact. I have served in this capacity for four
22 different pipelines, and three of those have just

1 occurred in the last 12 months.

2 Prohibited inputs in normal pipeline
3 construction include the use of polyurethane and
4 polyphenylene foam products used for pipe
5 stabilization and water breakers, sand blasting
6 materials using recycled ingredients, welding and
7 grinding residue, paint, contaminated dozer and
8 trackhoe tracks, buckets, and blades from
9 conventional farms, and boring fluids for
10 construction under roads and streams.

11 Alternative plans have been agreed
12 upon by pipeline companies for most of these
13 activities, however, the NOP regulations are
14 unclear on the following four issues. Number
15 one, top soil replacement. Pipes settle and
16 erosion events occur which result in the need to
17 bring in off-farm topsoil to fill these voids,
18 always confused as an inspector whether it needs
19 to be organic or whether prior land use
20 documentation suffices.

21 Number two, rock formations, they
22 require drilling and blasting by the companies

1 using dynamite and nitroglycerine, and our
2 question has always been, once this substance is
3 exploded, is it still prohibited?

4 Is there a -- number three, is there
5 a depth where a prohibited input is not going to
6 take a -- for instance, polystyrene pillows are
7 formed and lay under pipes at about 15-foot deep
8 to be used as rock shields.

9 And, number four, if an organic farmer
10 voluntarily pulls his right-of-way strip from
11 certification exchange for a three-years crop
12 compensation from the pipeline company, they've
13 got a lot of money, they don't care, they'll
14 write big checks, would the toxic products used
15 during normal construction be an issue in
16 granting -- certification after 36 months?

17 Some certifiers are really scared to
18 death about these foam products and are not sure
19 whether that can ever be recertified again, all -
20 - a concern for me, as an inspector.

21 So there's one thing I hear in common
22 from all pipeline companies, we ain't seen

1 nothing yet. The pipelines, there's going to be
2 lots of them coming through here. The pipeline
3 sites -- involved in only represent about 20
4 percent of what they're got tapped.

5 Thank you very much for hearing me
6 out, and those are the concerns that I have as an
7 inspector. Thank you.

8 CHAIRPERSON CHAPMAN: Thank you, Doug.
9 Any questions for Doug?

10 MEMBER BEHAR: This is Harriet. I
11 just want to say thank you for those four points
12 there at the end.

13 CHAIRPERSON CHAPMAN: Okay, Doug, not
14 seeing any questions. Thank you very much for
15 your testimony and your time today.

16 Up next, we have Jo Ann Baumgartner
17 followed by Corellia Johnson and then Steve Etko.

18 Jo Ann, are you on the line with us?

19 MS. BAUMGARTNER: Yes, can you hear
20 me?

21 CHAIRPERSON CHAPMAN: Yes, I can. And
22 can you start with your name and affiliation?

1 MS. BAUMGARTNER: Okay, thanks. I'm
2 Jo Ann Baumgartner with the Wild Farm Alliance.
3 We promote a healthy, viable agriculture that
4 protects and restores wild nature.

5 Thank you, again, to NOSB for passing
6 the proposed rule to eliminate the incentive to
7 convert native ecosystems to organic production.
8 Over 1,200 organic consumer comments supported
9 that proposal. The NOP should now begin moving
10 this recommendation forward to rulemaking.

11 With the help of organic and
12 conservation experts, we are putting together a
13 draft guidance for this rule that can be used by
14 the NOSB or the NOP as a starting point. It will
15 help operators and certifiers -- information
16 needed to determine whether or not a native
17 ecosystem has been converted.

18 Specifically, there are examples of
19 organic systems and questions that can be asked
20 from the desk and from the field and will also
21 provide other examples of land that has not
22 recovered enough to become a native system.

1 Now, for marine materials, any seaweed
2 that is used in organic production should adhere
3 to the wild caught standard that ensures no
4 destruction to the environment. All certifiers
5 should require documentation from operators for
6 monitoring efforts that show they are protecting
7 the environment.

8 Last year, we conducted a survey of 42
9 to 48 OSP new site certifiers in the U.S. The
10 majority allow visual assessment for the NOP
11 monitoring requirement. There were some
12 certifiers that required photographs or written
13 documentation because they felt like that was the
14 only way that they could really verify what the
15 operator was doing as they say they are. This
16 should be the norm.

17 Visual assessment alone is not enough.
18 Documentation should occur before and after each
19 marine vegetation harvest for all biodiversity.
20 But, the seaweed itself, the by catch from the
21 harvest and the wildlife that uses seaweed as
22 purchase for hunting and cover for predators.

1 For seaweed, documentation of the
2 three dimensional structure in the seaweed bed
3 against the height and bio mass should be
4 conducted. For bio catch, they can take a photo
5 of what's left in their boats. The wildlife
6 documentation should include a survey of birds
7 and marine mammals using seaweed.

8 We are in support of establishment of
9 a working group whose members include marine
10 biologists and other conservationists, land
11 owners who are impacted by seaweed harvest,
12 companies that harvest the seaweed, the producers
13 that use the seaweed, and consumers.

14 The creation of a wild marine
15 vegetation harvest guidance is critical for
16 uniform compliance. Thank you for listening to
17 my thoughts today.

18 CHAIRPERSON CHAPMAN: Thank you, Jo
19 Ann. Any questions for Jo Ann?

20 MEMBER BEHAR: So this is Harriet.
21 Hello, Jo Ann.

22 I was wondering if you had heard

1 anything from certifiers or inspectors or anyone
2 about the protecting the native ecosystem
3 proposal that we passed? Either concerns or, you
4 know, pleasure that it was passed and looking
5 forward to implementation? Have you heard
6 anything?

7 MS. BAUMGARTNER: Well, we have not
8 specifically outreached to them. We're still
9 working internally with this -- draft guidance.
10 So I will just say that, you know, there was a
11 lot of really good comments submitted in your
12 last meeting, if you'll recall, from certifiers
13 in support.

14 CHAIRPERSON CHAPMAN: Any other
15 questions?

16 Hearing none, thank you, Jo Ann.

17 MS. BAUMGARTNER: Thank you.

18 CHAIRPERSON CHAPMAN: Up next is
19 Corellia Johnson followed by Steve Etko and then
20 Ari Davis. Ari, we have not found you on the
21 line, so if you're on the line, if you could
22 comment in to the Chairperson, that would be

1 appreciated.

2 Coreellia, are you on the line with us?

3 Coreellia, if you're speaking, we can't hear you.

4 MS. ARSENAULT: I don't see her name
5 on the line, Tom, but there was someone from the
6 same area code, but I guess it's not her.

7 Thanks.

8 CHAIRPERSON CHAPMAN: Yes. All right,
9 Coreellia, not hearing you on the line. Give you
10 one more shot, otherwise, we'll skip over you and
11 move on to Steve Etkka. So, Steve, are you there?

12 MR. ETKA: I am. Can you hear me?

13 CHAIRPERSON CHAPMAN: I can, hold on
14 one sec, Steve.

15 So after Steve is Ari. Ari, we
16 haven't found you, so please comment in if you're
17 here, Ari Davis. And then after Ari is Nathan
18 Brown.

19 Steve, if you could start with your
20 name and affiliation?

21 MR. ETKA: Sure, my name is Steve
22 Etkka, and I'm Policy Director for the National

1 Organic Coalition. The Board's work is important
2 to the integrity of organics, so it's important
3 that you all be aware of the latest news in the
4 larger organic policy arena as well.

5 In that context, NOC is pushing hard
6 for Congress to pass a new Farm Bill. The 2014
7 Farm Bill and funding for key organic programs
8 officially expired on September 30th without any
9 action by Congress to finalize a new Farm Bill or
10 pass a short term extension of the old one.

11 Both House and Senate versions of the
12 Farm Bill include positive organic provisions and
13 bad ones. From our perspective, the bad
14 provisions include inappropriate statutory
15 changes to the NOSB authorities which NOC
16 strongly opposes.

17 We're pushing for a new Farm Bill that
18 keeps the good organic provisions and gets rid of
19 the bad. Fortunately, both versions of the Farm
20 Bill improve organic import fraud enforcement.

21 Related to enforcement, we are
22 concerned about the lack of reliable USDA organic

1 data collection, particularly for organic acreage
2 data. USDA's Economic Research Service and
3 National Agricultural Statistics Service used to
4 collect organic acreage data through the Organic
5 Certifier Survey. And we no longer have this
6 data because in 2017 the responsibility for
7 collecting organic acreage data from certifiers
8 was transferred to the AMS without the
9 appropriate infrastructure to collect meaningful
10 and complete data.

11 And, as a result, there will be a
12 multi-year gap in meaningful organic acreage data
13 as well as other -- organic data stretching from
14 2015 until the procedures for collecting and
15 inputting data via the NOP's organic integrity
16 database are strengthened. These gaps greatly
17 impede the organic community's ability to deter
18 fraud, especially through the use of mass balance
19 audits.

20 NOC believes that NOP should make
21 product and acreage reporting mandatory for
22 certifiers through the organic enforcement

1 rulemaking in spring of 2019, but should also
2 adopt a sound and sensible approach to ensure
3 that for certifiers working with small
4 diversified producers that it can be captured in
5 a reasonable way. We're also urging AMS to hire
6 some qualified statisticians to maintain and
7 analyze the data.

8 I also want to address the 606
9 exemption approval process. It should not be
10 enough for a petitioner, in our view, to show
11 that they are unable to source an organic farm of
12 an ingredient. Petitioners should have to show
13 that they have exhausted efforts to work with
14 farmers and suppliers to have the ingredient
15 produced organically.

16 Too many times, the 606 exemptions
17 become an impediment to farmers who want to
18 produce an organic product but have no market for
19 the product because buyers have a 606 exemption.

20 The organic industry has grown enough
21 that we should be able to produce most things
22 organically. Thanks for this opportunity to

1 provide testimony.

2 CHAIRPERSON CHAPMAN: Thank you,
3 Steve. Any questions for Steve?

4 MEMBER BEHAR: This is Harriet. Thank
5 you for bringing that up about 606. I think that
6 is something that we, NOSB members, do get a
7 little frustrated with. So we're going to see if
8 we can deal with that somehow in an up-front
9 petition question as well as maybe a checklist
10 that we can look at. Thank you.

11 MEMBER GREENWOOD: Tom, I had a
12 question.

13 CHAIRPERSON CHAPMAN: Go ahead, Rick.

14 MEMBER GREENWOOD: Steve, could you
15 just clarify what data had been collected prior
16 to 2015 that is no longer being collected?

17 MR. ETKA: So prior to that time,
18 originally, the USDA's Economic Research Service
19 did an Organic Certifier Survey. That
20 transferred over to NASS, the National
21 Agricultural Statistic Service at USDA, a number
22 of years later.

1 And that survey was done in a way
2 where USDA employees actually, when needed, would
3 go out and work individually with each certifier
4 to get the data, and as a result of that process,
5 they had near-universal compliance with providing
6 that data.

7 But what we have seen is now that AMS
8 has taken over that function, and it's supposed
9 to be part of the Organic Integrity Database,
10 that process has been slow to get started, and
11 the complexity of what certifiers are supposed to
12 be providing has meant that there has not been
13 good compliance with providing that data.

14 And as a result, we just don't really
15 even know how much organic acreage we have
16 anymore. The last -- we have was back in 2015.

17 So it really causes a lot of problems.
18 We can't track production trends. It makes it
19 harder for putting together risk management
20 tools. It makes it very difficult to do mass
21 balance auditing as part of the effort to crack
22 down on particularly import fraud, but also

1 domestically.

2 So it's a problem in a number of
3 different areas. And we like the fact that the
4 Organic Integrity Database has been -- is real-
5 time, but there's some problems with it that need
6 to be addressed so that we can get back on track
7 in getting the data.

8 MEMBER GREENWOOD: Thank you, Steve.

9 CHAIRPERSON CHAPMAN: Any other
10 questions for Steve?

11 Steve, you said that small producers
12 -- acreage data about small producers should be
13 captured in a reasonable way. What -- how would
14 you -- what would you suggest as reasonable?

15 MR. ETKA: Well, one example we laid
16 out in our written comments would be for
17 certifiers working with producers would grow on
18 small acreage and have like mixed -- diversified
19 vegetable operations, for instance.

20 You know, they may have a number of
21 hundred foot rows and, in certain cases where
22 you're dealing with a small producer, it may be

1 sufficient to capture the data as mixed
2 vegetables on 2.5 acres, for instance, as opposed
3 to having to list, you know, seven or eight
4 different tiny amounts of individual vegetables.

5 You know, in other areas where you
6 have certain high risk crops like where we've
7 seen some of the fraud like corn and other
8 things, it may be really important to gather that
9 data, but for small, diversified operations there
10 may be some sound and sensible way to do that
11 that would discourage the inputting of that data.

12 CHAIRPERSON CHAPMAN: Thank you. And
13 then on the 606 issue and your comments about
14 farmers not being able to find a market for some
15 606 items because of the exemption.

16 I mean, we've seen several examples of
17 items coming off that list with operations, you
18 know, developing in organic farming and
19 petitioning the Board to have it removed.

20 So it's worked in some cases and not
21 -- and I'm taking from your comments that you're
22 thinking it's not working in other cases. What's

1 causing that difference? Why does it work
2 sometimes and not the rest of it?

3 MR. ETKA: You know, I'm thinking back
4 a number of years to the hops example where there
5 was kind of a big fight about whether or not that
6 could come off the 606 list. And what we're
7 hearing from producers is that they really felt
8 like they could and wanted to produce hops
9 organically.

10 But because of the complexity of the
11 crop, often it's done under contract, and because
12 buyers didn't need to use organic forms, it just
13 dried up that market.

14 So it's not only the question of
15 whether it comes off, it's also the question of
16 whether it goes on and whether there's the due
17 diligence up front by a petitioner to not just
18 determine that it's not available right now, but
19 also to see if there's a way that could work with
20 suppliers and farmers to make it available before
21 they go through the 606 or have to go through the
22 606 process.

1 I mean, we're certainly aware that
2 time is of the essence for many buyers, but I
3 guess we also wanted to point out that the 606
4 process is not a fast process either, as you all
5 know. It's sort of -- the NOSB process, but then
6 it has to go through the USDA rulemaking process
7 which is quite timely and cumbersome in many
8 ways.

9 It would just be easier for a buyer to
10 be kind of proactive in the market in trying to
11 work with farmers and ingredient manufacturers to
12 have it provided organically.

13 CHAIRPERSON CHAPMAN: Okay, thank you,
14 Steve. Any other last questions for Steve?

15 MEMBER SWAFFAR: Hey, Ashley here. I
16 just want to say one comment. Steve, I think you
17 are spot on on your comments about the data
18 collection for small farmers.

19 It's my experience that those people
20 don't care to let you take the time to figure
21 that out. They always call me in the most random
22 times and never have that data available. So I

1 like that of a mixed vegetable idea. Good idea.

2 MR. ETKA: Thanks.

3 CHAIRPERSON CHAPMAN: Okay, thank you,
4 Steve. Up next we have Ari Davis followed by
5 Nathan Brown and Jessica Shade.

6 Ari, are you here? Not sure if we've
7 been able to identify your phone number yet.

8 Ari, if you're speaking, we can't hear
9 you. Ari, going once, going twice.

10 Okay, we'll move on down the list. Up
11 next is Nathan Brown. Nathan, are you here?

12 MR. BROWN: Yes, I'm here.

13 CHAIRPERSON CHAPMAN: Okay, Nathan, we
14 can hear you. Hold on one second, Nathan.

15 Up after Nathan will be Jessica Shade
16 followed by Jaydee Hanson.

17 Nathan, if you'd start with your name
18 and affiliation?

19 MR. BROWN: My name is Nathan Brown,
20 and my family has Amaltheia Organic Dairy. I've
21 been past Chair of the Montana Organic
22 Association and on the Farmer Advisory Council

1 for the Organic Trade Association.

2 I'm commenting today on the paper pot
3 transplanter, and I'd make a recommendation from
4 the NOSB to extend the December 2018 deadlines
5 for its use until the NOSB has a chance to review
6 the material and vote on the petition.

7 I've used this paper pot transplanter
8 for one year. I got it about a year ago to do
9 winter greenhouse growing. And, it's totally
10 changed my farm. I can now do crops like lettuce
11 mix. I've transplanted beets, all of the onions
12 and shallots, bok choy using one person this year
13 did all of my seeding and all of my
14 transplanting.

15 A typical 250-sub-bed took about an
16 hour where it would take four to five people
17 probably three hours before to transplant that
18 bed. It's just been remarkably efficient for us.

19 And, it has obviously affected the
20 quality of my produce as well. All of my onions
21 and shallots are more uniform than they've ever
22 been. It also almost doubled my yield in the

1 same growing area from previously doing onions.

2 It has also -- we can reuse the trays.
3 We can use less potting soil and I think all of
4 these obviously impact small farms like myself.

5 One of the things I guess I'm most, I
6 guess, proud of and the biggest impact I would
7 say is we've been able to pay employees more
8 because we've been able to increase our income
9 because we're not having to pay employees to do
10 basically back breaking transplanting on our
11 small farm.

12 We're too small for a water wheel
13 transplanter. And so, I guess, years past, the
14 highest I've paid is \$13 an hour and this year,
15 I'm paying two of our experienced employees \$15
16 an hour.

17 And, I'm in Bozeman, Montana which is
18 a fast growing, very expensive place to live.
19 And, it has been harder and harder for us to find
20 candidates for employment, so this has really
21 helped out as well.

22 Thank you for your time.

1 CHAIRPERSON CHAPMAN: Thank you,
2 Nathan. Thank you for your comments.

3 Any questions for Nathan?

4 MEMBER OAKLEY: This is Emily. I just
5 wanted to let people know that we've discussed
6 this quite extensively across the Committee.

7 And, I wondered if Steve and or Paul
8 might want to share a little bit about our most
9 recent conversation and especially in terms of
10 the possible extension of the December 2018
11 deadline.

12 Do either of you want to comment on
13 that?

14 MEMBER ELA: This is Steve, I can jump
15 in. I was actually going to ask a question.

16 And, again, the NOP, I think is going
17 to talk about this at the meeting in St. Paul as
18 well. But, one of the big issues, there's not
19 really much debate, I think, on this, on the
20 efficacy of paper pots and what they -- the time
21 and labor savings and all those things.

22 I think the real the problem we're

1 having is that since they used virgin paper --
2 well, there are a number of issues, but one of
3 them is that the virgin paper and virgin -- and
4 the current guidelines are recycled paper such as
5 news print.

6 And then, also, the issue of the
7 uncertainty of the adhesive use.

8 And then, that puts the Board and the
9 NOP in a real quandary of recognizing that this
10 is a really valuable item, but also of not -- as
11 how do we extend a deadline for something that is
12 potentially synthetic without prior approval of
13 that?

14 And so, that's the quandary that we're
15 in at this point. We certainly I think that the
16 Crops Committee is really sensitive to what
17 you're saying on the plight of these growers
18 using the paper pots.

19 And, it's also kind of a Catch-22 not
20 wanting to set precedent, but we're going to have
21 to -- but if something's petitioned, we're just
22 going to allow it to be used without complete

1 review.

2 So, that's kind of the cliff notes of
3 some of our dilemma at this point. But, Paul, if
4 you want to add anything, go ahead.

5 CHAIRPERSON CHAPMAN: Paul or Devon?

6 MS. ARSENAULT: Paul may have dropped
7 off the call, sorry.

8 CHAIRPERSON CHAPMAN: All right.

9 MEMBER ELA: So, Tom, maybe I'll just
10 ask a question of the commenter.

11 Given that, what would be -- I mean,
12 we're, of course, we're trying to deal with the
13 OFPA criteria and not allowing the use of
14 synthetic on a farm until it's actually formally
15 petitioned or approved.

16 Given that problem (inaudible due to
17 telephone interference)-- how we address that
18 issue?

19 (TELEPHONE INTERFERENCE)

20 MR. BROWN: Sorry, I guess I'm
21 (inaudible due to telephone interference)

22 MS. ARSENAULT: So, I just muted

1 Steve, but it did not stop that noise. I'm not
2 sure where we're getting the feedback from.

3 DIRECTOR LEWIS: Michelle, can you
4 hear me?

5 MS. ARSENAULT: I can hear you, yes.
6 Who is this?

7 DIRECTOR LEWIS: Great, this is Paul.
8 So --

9 MS. ARSENAULT: Hey, Paul.

10 DIRECTOR LEWIS: Yes, I was on.

11 So, let me try to add some commentary
12 to this. Yes, so, just to paraphrase what Emily
13 spoke about, we had extensive conversations,
14 obviously, at the subcommittee level and also at
15 the exec committee.

16 Dr. Tucker, the Deputy Administrator,
17 will be talking about this in more detail, Emily,
18 at the NOSB meeting next week and really
19 outlining the issue that Steve spoke about in
20 terms of the issue of paper and the
21 classification of paper.

22 And then, obviously, the other issue

1 in terms of the use of adhesives and paper pots.
2 So, she'll be talking about that in more detail
3 at next week's meeting.

4 CHAIRPERSON CHAPMAN: Okay. Steve,
5 did you have a question that you wanted to
6 repeat? I don't think it was heard.

7 Thank you, Paul.

8 MEMBER ELA: Sure. I was just going
9 to ask the commenter how he would prefer we deal
10 with -- I mean, the Crops Committee, obviously,
11 is very sensitive to this. But, given the issues
12 of virgin paper and adhesives and the potential
13 use of a synthetic on organic farms before it's
14 fully approved or added to the national list, how
15 we should handle that?

16 MR. BROWN: Well, I guess from what
17 everybody has told me that there is the -- the
18 glue is in other paper products, cardboard and
19 compost ingredients that people can use right now
20 in organic production. It's the same
21 ingredients.

22 And, I've not heard anybody say that

1 there was a synthetic in the ingredients list.
2 That, I've not ever heard. If there was, I would
3 definitely take a different tone.

4 But, I would say, you need to figure
5 out exactly what's in the ingredients and if it's
6 the same ingredients that we're already able to
7 use in compost making, that goes right into the
8 soil as well.

9 I've had no issues with them breaking
10 down in our soil at all. When we harvested the
11 onions, there wasn't hardly any paper left when
12 we harvested.

13 (Simultaneous speaking.)

14 MEMBER ELA: Yes, I think the issue is
15 that the -- oh, I was just going to follow up,
16 Emily, real quick.

17 The issue is that the --

18 MEMBER OAKLEY: Yes, Steve.

19 MEMBER ELA: -- adhesives themselves
20 are synthetics and they or may not be used in
21 paper already.

22 And then, the current listings for

1 recycled papers, not virgin paper. So, and those
2 two issues are kind of key to the problem we're
3 facing.

4 MR. BROWN: Yes, I understand that.
5 I think they just need time to come up with an
6 alternative is the other big issue. I know
7 they're working on it, they just need time to
8 implement it.

9 And, I guess I've also -- yes, it's
10 the first -- I'm going to call it the first I've
11 heard that it is a prohibited substance in the
12 ingredients list.

13 CHAIRPERSON CHAPMAN: Emily, do you
14 want to say one last thing or a question and then
15 we'll need to move along?

16 MEMBER OAKLEY: Yeah, no, it's
17 basically what Steve said. I mean, there are
18 several adhesives that bind the paper together.
19 And, they are synthetic adhesives, but at least
20 one of them is in newspaper and at least one of
21 them, we're having a hard time determining if it
22 currently is in newspaper or cardboard or other

1 current allowed recycled materials.

2 So, I completely empathize with and
3 understand your perspective. But, we just want
4 to let know that I think probably, I mean,
5 personally, that the current situation revolves
6 around the adhesive.

7 But, we will discuss at the meeting
8 any possible options for extension of that
9 deadline and look forward to hearing from Dr.
10 Tucker about that.

11 Thank you.

12 CHAIRPERSON CHAPMAN: Al right, thank
13 you Board members and thank you, Nathan, for your
14 comments on this item. Clearly, it's an item
15 that is important to a lot of farmers and a lot
16 of Board members.

17 Up next, we have Jessica Shade,
18 followed by Jaydee Hanson and then Amber Pool.

19 Jessica, are you on the line with us?

20 MS. SHADE: Yes, I'm on the line.

21 CHAIRPERSON CHAPMAN: Hi, Jessica, if
22 you'd start with your name and affiliation?

1 MS. SHADE: Hi, I'm Dr. Jessica Shade,
2 the Director of Science Programs for the Organic
3 Center. We're a nonprofit that communicates
4 research of interest to organic stakeholders and
5 then we also collaborate with government and
6 academic institutions to conduct research when we
7 find gaps in our knowledge.

8 So, first, I want to say, we really
9 appreciate the time that the Material
10 Subcommittee spent on its recommendation on
11 research priorities. We really like the creation
12 of the research priority framework and the
13 efforts of each Subcommittee to set their
14 research priorities for 2018.

15 And so, I just have a few comments on
16 them. So, first, I want to say that we're
17 especially happy to see that you included organic
18 no-till practices, plant disease management,
19 strategies for controlling invasive insects and
20 production of celery for celery powder yield in
21 nitrate sufficient for cured meat.

22 Because, we're actively involved in

1 conducting and communicating research on those
2 topics. And, we think that the NOSB prioritizing
3 them will really help us secure funding to
4 continue the work.

5 So, for example, on the organic no-
6 till practices, the organic is collaborating with
7 Dr. Kate Tully at the University of Maryland to
8 look at practices that improve soil health on
9 organic farms.

10 And, one of the areas that we included
11 was the comparison of no and low till in organic
12 production versus standard tillage in organic
13 production.

14 And, overall, the surface level for
15 organic carbon levels are higher in reduced
16 tillage plots compared to standard tillage plots
17 for organic.

18 But, we also found that reduced
19 tillage in organic was associated with
20 significant reductions in yield.

21 So, basically, while organic farmers
22 could improve carbon sequestration by reducing

1 tillage, we really need to have more research to
2 support farmers that want to use conservation
3 tillage to make sure that it's a viable and
4 economically feasible option for a wider variety
5 of crops.

6 So, we're really thankful that the NOC
7 included that because it'll help encourage
8 research and provide really needed tools to help
9 organic farmers realize the benefits of reduced
10 tillage without threatening their yield.

11 We've also been working on several
12 aspects of plant disease management that are
13 directly called out in the 2018 research
14 priorities.

15 So, for example, we addressed the
16 research priority alternative to antibiotics for
17 fire blight in a project we did a couple years
18 ago with the University of Washington.

19 We worked on -- we're currently
20 working on integrative pest management strategies
21 for organic rice. We're also working on a
22 project that looks at organic solutions to

1 citrus screening.

2 But, before I use all my time talking
3 about projects that we're currently doing, I also
4 wanted to touch on additional research needs.

5 So, one thing we're continually doing is
6 collecting information on research needs and we
7 think that --

8 CHAIRPERSON CHAPMAN: Jessica, that's
9 your time, but --

10 MS. SHADE: Yes.

11 CHAIRPERSON CHAPMAN: -- there might
12 be a question from the Board for you.

13 MS. SHADE: Oh.

14 CHAIRPERSON CHAPMAN: Any questions
15 from the Board?

16 MEMBER BRADMAN: Yes, this is Asa.

17 CHAIRPERSON CHAPMAN: Go ahead, Asa.

18 MS. SHADE: Hey there.

19 MEMBER BRADMAN: Hi, Jessica, if you
20 would just finish what you were going to say and
21 tell us about the -- what you contend the needs
22 are.

1 MS. SHADE: Sure. So, soil health,
2 climate change and then pathogen protections for
3 uses with with raw manure should be considered.
4 Those are the three things that I think might be
5 additionally beneficial for including in the
6 research priorities.

7 CHAIRPERSON CHAPMAN: So, I got
8 climate change, the pathogen protection, what was
9 the other one?

10 MS. SHADE: Soil health.

11 CHAIRPERSON CHAPMAN: Soil health.
12 So, climate change, specifically, what would you
13 want to be included there?

14 MS. SHADE: So, there are two aspects
15 of climate change that I think need a lot more
16 research.

17 One is mitigation, so best practices
18 for mitigating climate change on farms.

19 And then, also, adaptation because,
20 regardless of how well we do with climate change
21 adaptation, we are seeing much more frequency and
22 --

1 MS. ARSENAULT: Sorry, that was me, I
2 accidentally muted Jessica. Sorry, Jessica,
3 could you repeat your last couple words?

4 MS. SHADE: Oh, I was saying
5 increasing frequency and intensity of extreme
6 weather, so how organic can adapt to those
7 situations.

8 CHAIRPERSON CHAPMAN: Okay, thank you,
9 Jessica.

10 Any other questions for Jessica? All
11 right, thank you for your testimony.

12 Up next, we have Jaydee Hanson
13 followed by Amber Pool and then Ronald Gonzales.
14 Ronald, we haven't been able to identify you, so
15 if you're on the line, please message us.

16 Jaydee, are you on with us? Jaydee, if
17 you're talking, we can't hear you.

18 MS. ARSENAULT: Tom, can I interrupt
19 for just one second? We're getting a little
20 background noise. So, if you could please mute
21 yourself if you're not talking, I appreciate it.
22 Thanks.

1 CHAIRPERSON CHAPMAN: Yes, Jaydee? Is
2 Jaydee here? I know we've kind of missing you
3 here. We see you on the web portion, but we're
4 not hearing you.

5 All right, Jaydee, we'll come back if
6 you're just having a technical issue.

7 Amber, are you on the line with us?

8 MS. POOL: I'm here.

9 CHAIRPERSON CHAPMAN: All right,
10 Amber, you'll be up next, give me one second.

11 After Amber is Ronald Gonzales. We
12 haven't identified and then after that is Jamie
13 Barron who we haven't identified. And, there's
14 actually about another four or five names that we
15 haven't identified the person on the line yet.
16 So, if you're Ronald Gonzales, Jamie Barron,
17 Timothy Opiela, Tonda Fernando, Harold Lyles or
18 Jean Marie Gore Traore, please message in and let
19 us know your phone number.

20 I guess, and if you're after those
21 names on the list, you might be coming up
22 quickly.

1 So, Amber, if you could start with
2 your name and affiliation for the record?

3 MS. POOL: Hi, this is Amber Pool and
4 I work for CCOF in the Farm Certification
5 Department.

6 I want to thank the Board for, once
7 again, giving us this opportunity to speak and
8 comment through the webinar.

9 CCOF is a nonprofit organization
10 governed by the people who grow and make food.
11 Started in California more than 40 years ago, to
12 be our roots, spread the breadth of North
13 America.

14 We are supported by an organic family
15 of farmers, ranchers, crop dusters, retailers,
16 consumers and policy makers.

17 Together, we work to advance organic
18 agriculture for a healthy world.

19 After working with certified organic
20 growers at CCOF for more than 12 years, I wanted
21 to let the Board know that the color requirements
22 for adding the USDA organic seal to packaging is

1 a financial hardship for farmers.

2 In modifying Section 205 bringing 311
3 in to allow the USDA organic seal to be used in
4 any foreign color, not 5A, it improves the use of
5 this seal when considering the cost of compliance
6 for farmers.

7 The current limitations to only black
8 in terms of the one color printing is the USDA
9 seal is not or cannot be used on plastic or a
10 package that is not black.

11 To place the seal, certified
12 operations must upgrade to two colors. This
13 limits the use of the USDA seal on many produce
14 cartons and other boxes.

15 The modification of 205.311 to allow
16 any single color would reduce the cost in the
17 production system in crops that meet the
18 certification and represent a reduction in
19 regulatory burden for farmers.

20 Thank you and those are my comments.

21 CHAIRPERSON CHAPMAN: Thank you,
22 Amber.

1 Any questions for Amber? Hearing none,
2 thank you.

3 Jaydee Hanson, have you been able to
4 call back in yet?

5 MR. HANSON: I have.

6 CHAIRPERSON CHAPMAN: All right,
7 Jaydee. Hold on one second, I'm going to run
8 through the list again of folks after you, but we
9 do have you on the line now.

10 So, after Jaydee, I'm going to turn
11 through a long list because we haven't confirmed
12 about the next seven or so folks. So, will the
13 next after Jaydee is Ronald Gonzales, then Jamie
14 Barron, Timothy Opiela, Tonda Fernando, Harold
15 Lyles, Jean Marie Gore Traore, Inita Patton.

16 The next one, we have confirmed on the
17 line, so just to give a heads up, Suzanne
18 McMillan, just so you know, you might actually
19 come up really quick.

20 With that, Jaydee, can you start with
21 your name and affiliation for the record?

22 MR. HANSON: I'm Jaydee Hanson, Senior

1 Policy Analyst at the Center for Food Safety.

2 You have extensive comments from us.

3 I'm just going to focus on two parts. First,
4 silver dihydrogen citrate.

5 The Center for Food Safety urges NOSB
6 to reject Pure Bioscience's petition to add
7 silver dihydrogen citrate to the national list.

8 Even with the recommended annotation,
9 we have substantial concerns regarding
10 nanoparticles as well as the environmental and
11 human health impacts of the over use of silver
12 antimicrobials in food and farming.

13 We think that silver dihydrogen
14 citrate is incompatible with the sustainable
15 agriculture and should not be allowed.

16 While the company states their
17 specific product does not contain silver
18 nanoparticles, we iterate our concern that
19 citrate is typically used in combination with
20 silver for the purpose of controlling the size
21 and shape of silver nanoparticles which increase
22 the efficacy of the silver ions into microbial

1 properties.

2 In fact, just last week, I heard Dr.
3 Timothy Duncan, an FDA research chemist raised
4 this question on the effects of citrate in silver
5 compounds at the national nanotechnology
6 leadership meeting on environmental effects of
7 nanoparticles.

8 So, even if the particle size of the
9 specific product is at that size that the company
10 claims, we still think it's incompatible with our
11 organics because of the way the citrate will
12 interact with the ion silver.

13 We provided in our April 2018 comments
14 a longer discussion of this.

15 Basically, silver nanoparticles work
16 to slow the release of ionic silver and increase
17 its efficacy, in effect, make it a more powerful
18 pesticide.

19 The potential discharge or spread of
20 silver in the environment will negatively impact
21 microbial life in waterways. Moreover, research
22 at Duke University meets another thousands of

1 plants dosed with nano silver demonstrates that
2 some plants are especially prone to damage from
3 nano silver.

4 So, basically for two reasons, we're
5 urging the --

6 CHAIRPERSON CHAPMAN: Thank you,
7 Jaydee, we're at the agreement. We'll see if we
8 have any questions from the Board.

9 Any questions for Jaydee?

10 MEMBER BRADMAN: This is Asa.

11 I had a couple questions about the --
12 is there any evidence or information perhaps in
13 your review about contaminated soil and the
14 activity in the tampering.

15 And then, just to clarify, how much
16 you have the information that you talked about
17 now in more detail in the written comments?

18 And, in the comments, do you talk
19 about the same things in the written comments?

20 MR. HANSON: Could you repeat the
21 question? I'm on a cell phone now.

22 MEMBER BRADMAN: I'm sorry, a two part

1 question.

2 One, do you have information about
3 soil contamination and then, two, are there any
4 comments that you made just now verbally that are
5 not in the written comments?

6 MR. HANSON: Only the reference to
7 conductors of the recent research.

8 The one thing, though, that is not in
9 there is, I'm the U.S. Co-chair of the
10 Nanotechnology Committee for the Trans-Atlantic
11 Consumers' Dialogue.

12 And, in Europe, the European
13 Parliament has modified the European Commission
14 proposal on EU organic standards to clearly
15 exclude nanomaterials.

16 So, that's in our comments, but, yeah,
17 I think it's important that we do what we can to
18 maintain compatibility between EU and U.S.
19 organic standards.

20 CHAIRPERSON CHAPMAN: So, Jaydee, can
21 you help me understand why the proposed
22 annotation is not sufficient to mitigate your

1 nano, your specific nano concerns?

2 MR. HANSON: Well, I mean, it's not
3 sufficient because it's -- you're basically, if
4 you will, expecting this material to stay as a
5 silver ion by using citrate in the compound.

6 If it ends up reducing to nano silver
7 particles, which we would argue, should be
8 excluded.

9 CHAIRPERSON CHAPMAN: So, you're
10 saying there's no form of this material that can
11 be manufactured with citrate that would not
12 contain nanoparticles?

13 MR. HANSON: That would not reduce the
14 nanoparticles, I don't believe so. There are,
15 you know, a couple of references in our comments
16 that would point you to the one backdrop and slam
17 on the toxicity of silver ions and nano silver
18 particles in colloidal silver.

19 And, it's, you know, the silver is a
20 very toxic substance when you mix it with
21 citrate, you actually are making it more toxic.

22 So, to answer your question, probably

1 no.

2 CHAIRPERSON CHAPMAN: Okay. And then,
3 I mean this petition for use as an antimicrobial
4 in a sanitizer at some level, those will always
5 have to have some level of toxicity to be
6 effective in the application.

7 So, I know you were --

8 MR. HANSON: Silver and --

9 CHAIRPERSON CHAPMAN: -- of that. So,
10 what -- like, how do you suggest, you know, a few
11 ways the needs of providing safe foods with the
12 inherent incompatibility between any level of
13 environmental and health issue with a different
14 type of sanitizer?

15 MR. HANSON: Well, you're going to
16 have some different kinds of problems with
17 metallic citrates or metallic oxides. You know,
18 the problem environmentally is twofold.

19 Yes, it is an excellent antimicrobial.
20 Personally, I think it should be reserved for
21 medical uses and not sprayed around farms or
22 cutting boards or used in any farm uses.

1 There is a preliminary research
2 showing, too, that certain plants are especially
3 prone to uptake nano silver and silver ions.

4 And so, if you then dump it out, which
5 you basically do when you're using it for these
6 antimicrobial uses, you're going to have it go
7 into certain crops. So, it shouldn't be in food
8 and it shouldn't be in waste water and certainly
9 be used next to next to absorb it.

10 CHAIRPERSON CHAPMAN: And, then, the
11 -- I think there was in the EPA review the
12 substance they did not find it would cause a
13 contamination greater than what's already in the
14 background would be far below the background
15 levels of silver. And, that's insufficient for
16 you, is that correct?

17 MR. HANSON: Yes, well, you know, we
18 have sued the EPA and actually won on the issue
19 of nano silver. The EPA, frankly, has, in many
20 cases, and the Judge in our last case agrees with
21 me on this, the EPA has, in many cases related to
22 nano silver, had a belief based, not a science

1 based policy.

2 So, you know, again, there are other,
3 you know, I would say to look at the work of
4 Timothy Duncan, the FDA's research scientist
5 actually looking at this kind of product. And,
6 he comes to that conclusion.

7 CHAIRPERSON CHAPMAN: And, these folks
8 that you've cited, are they in your --

9 MR. HANSON: Yes.

10 CHAIRPERSON CHAPMAN: -- written
11 comments? Okay.

12 MR. HANSON: Yes, except for the last
13 paper on from Duncan and I can send that in.

14 CHAIRPERSON CHAPMAN: Yes, could you
15 send that to Michelle so we would have a chance
16 to --

17 MR. HANSON: Yes.

18 CHAIRPERSON CHAPMAN: -- review that
19 as well? Appreciate it. And, I appreciate the
20 detailed comments on this, both on the phone and,
21 I imagine what's in the written comments. I
22 haven't been -- haven't had a chance to get to

1 yours yet, but I definitely will between now and
2 the full meeting.

3 MR. HANSON: Yes, both this one and
4 the longer comments from April. Thank you very
5 much. You guys have a lot to go through.

6 CHAIRPERSON CHAPMAN: Yes. Not hearing
7 any or seeing any. So, Jaydee, thank you for
8 your comments.

9 MR. HANSON: Okay, thank you.

10 CHAIRPERSON CHAPMAN: Okay. So, so
11 far, we still haven't gotten any confirmations on
12 anyone up until Suzanne McMillan.

13 I will run through that list just to
14 make sure they're not here, but Suzanne, just be
15 prepared, we might be coming to you very quickly.

16 So, Roland Gonzales, Roland, are you
17 here?

18 Roland, going once, going twice. Up next, Jamie
19 Barron. Jamie, are you here? Jamie, going one,
20 going twice. All right, next is Timothy Opiela.

21 Timothy, are you here? Going once, going twice.

22 All right, Tonda Fernando. Tonda, are you here?

1 Hearing none, next up is Harold Lyles. Harold,
2 are you here? Hearing nothing, next is Jean Marie
3 Gore Traore, are you here?

4 All right, and then Inita Patton.
5 Inita, are you here? All right, that was a huge
6 list of folks. So, Suzanne, you were at 11:50,
7 so we're about 12 minutes ahead of schedule right
8 now.

9 Suzanne, let me just check, you're
10 here, is that correct? Suzanne, are you hear?
11 Are you speaking? If you're speaking, you're on
12 mute.

13 MS. ARSENAULT: I see Suzanne on the
14 line on the web portion.

15 CHAIRPERSON CHAPMAN: Yes.

16 MS. ARSENAULT: So maybe -- Suzanne,
17 maybe it's your mic that's not working. Oh, no,
18 I see you using a headset, yes.

19 CHAIRPERSON CHAPMAN: Suzanne, are you
20 muted? We're not hearing from you.

21 PARTICIPANT: Hello? Hello?

22 CHAIRPERSON CHAPMAN: Hello, Suzanne.

1 Suzanne, are you there? All right, Suzanne's not
2 there.

3 Next up would be Marie Burcham.

4 Marie, are you there?

5 MS. BURCHAM: Can you hear me?

6 CHAIRPERSON CHAPMAN: I can, Marie.

7 But, hold on, Marie, because now we're fairly
8 ahead of schedule.

9 And, I don't know if the next people
10 are here, either. So, if the -- after Marie
11 would be Heidi Lopez-Rodriguez. And after Heidi
12 would be Joseph Similanick.

13 Michelle, have you confirmed any of
14 those folks being on the line?

15 MS. ARSENAULT: I have not yet, Tom.
16 So, I will do that.

17 CHAIRPERSON CHAPMAN: Okay. Marie,
18 you're up next if you're ready to go. We can
19 start with your name and affiliation for the
20 record.

21 MS. BURCHAM: Yes, of course. Hello
22 and good afternoon. My name is Marie Burcham and

1 I am the Livestock Policy Analyst for the
2 Cornucopia Institute. I'm also an attorney with
3 a background in natural resource and animal law.

4 Members of the Board and the public,
5 thank you for the opportunity to speak on the
6 material petition of NOSB research priorities.

7 Cornucopia supports the NOSB comments
8 in their entirety and hopes the NOSB will
9 consider beyond pesticide exclusion in this
10 matter.

11 We specifically oppose the listing of
12 the petition substances silver dihydrogen
13 citrate, allyl isothiocyanate, and natamycin.

14 Cornucopia submitted written comments
15 telling why we oppose the listing of these
16 specific materials in more detail.

17 But, I would like to speak a little
18 bit about the livestock research priorities and
19 discussion documents on the agenda.

20 First, we strongly support evaluating
21 the current uses of natamycin on organic farms
22 with concerns that direct natamycin is used

1 principally as a production tool rather than a
2 dietary supplement essential for animal welfare.

3 If accurate, that would not be
4 compatible to organic agriculture.

5 Poultry get natamycin in their -- from
6 their diets and poultry who are raised following
7 the spirit and letter of organic law should be
8 most, if not all, the natamycin from a varied
9 diet supplemented by adequate foraging.

10 We also urge -- concern about the use
11 of fish meal and animal byproducts, fish meal in
12 particular, and it's impacts on fish stock and
13 ocean ecosystem health.

14 We do support further research into
15 parasite prevention measures. This research is
16 particularly needed for organic sheep research,
17 the biodiveristy of native invertebrates and
18 micro organisms should be carefully considered
19 during this research as it has applications for
20 both human and animal health.

21 We also support research into organic
22 livestock breeding and we hope that the focus on

1 keeping breeds viable for grass based production
2 and true outdoor production will be maintained.

3 High production rates of both milk and
4 meat should not be the focus of the research.
5 The research focus should be on quality of the
6 product and healthy livestock animals.

7 Again, the agriculture is not premised
8 on a price and conventional imports with organic
9 imports and so it is preventative soil based
10 farming methods that improve soil through
11 holistic farming strategies.

12 Livestock breed protection is a very
13 important piece of the organic label.

14 Finally, we are very happy to see even
15 more discussions -- more material discussion
16 documents but still more work needs to be done on
17 this topic as it is not dealt with in the depth
18 this topic needs. And, there is much more moving
19 forward.

20 We do support the wealth of comments
21 on this issue.

22 Thank you so much for listening to me

1 today and I hope you will consider our written
2 comments on these topics as well.

3 CHAIRPERSON CHAPMAN: Thank you,
4 Marie.

5 Any questions for Marie? Not hearing
6 or seeing any, thank you for your comments.

7 MS. BURCHAM: Thank you.

8 CHAIRPERSON CHAPMAN: Suzanne, are you
9 on the line with us now?

10 MS. MCMILLAN: Yes, can you hear me?

11 CHAIRPERSON CHAPMAN: Yes, and hold on
12 one second, Suzanne.

13 MS. MCMILLAN: Thanks.

14 CHAIRPERSON CHAPMAN: So, I'm told
15 that there's someone speaking that I may have
16 skipped over before. We've got the name of one
17 of the speakers that I read out.

18 Ronald, Jamie, Timothy, Tonda, Harold,
19 Jean Marie or Inita, any of these folks on the
20 line now?

21 Okay, not hearing any of those, so,
22 after Marie, or sorry, after Suzanne, then I have

1 Heidy Lopez-Rodriguez, Joseph Similanick, Michael
2 Forrest, Frankie Thorn and then Linley Dixon.

3 I don't have any of those folks except
4 Linley Dixon confirmed to be on the line. So,
5 Linley, just a heads up that you might be coming
6 to you quickly.

7 And, if any of you folks that I
8 skipped over are here, please message us so we
9 can come back to you.

10 Suzanne, you're up next, if you could
11 start with your name and affiliation for the
12 record?

13 MS. MCMILLAN: Thank you.

14 Hi, I'm Suzanne McMillan, Content
15 Director for the ASPCA Farm Animal Welfare
16 Program.

17 Thank you for the opportunity to
18 provide comments to the NOSB on behalf of the
19 ASPCA and our millions of supporters nationwide.

20 The written comments we submitted
21 focused on NOSB's livestock research priority,
22 particularly the goal of breeding animals adapted

1 to outdoor life and living vegetation.

2 So, I'll just reiterate some of our
3 points here today.

4 We thank the NOSB for addressing the
5 critical issue of livestock and poultry genetics,
6 something we've urged through comments for a
7 number of years now.

8 Reforms to policies related to animal
9 genetics are critical for ensuring adequate
10 welfare for animals raised organically as well as
11 consumer confidence in organic animal products.

12 Genetics serve as the cornerstone to
13 animal health and welfare. They inform immune
14 function, the ability to manage environmental
15 stressors and a wide range of physical abilities
16 down to basic locomotion.

17 The vast majority of U.S. farm animals
18 are selectively bred for high yields of meat,
19 milk and eggs. This brings welfare tradeoffs,
20 some of which are detailed in our written
21 comments.

22 So, the point I want to make here

1 today is that none of this should be surprising.
2 The scientific principle of resource allocation
3 written about by Temple Grandin among others,
4 dictates that animals have various biological
5 functions, such as maintenance, growth,
6 reproduction as well as general health and well
7 being.

8 The resources in animals has available
9 to devote to all of these functions in total are
10 finite. And so, their resources must get
11 distributed across all of them.

12 A healthy animal will naturally find
13 this balance, but if breeding programs
14 overemphasize only one or a few of these
15 biological traits, as has happened in the U.S.
16 with our excessive breeding of livestock and
17 poultry for production traits such as milk volume
18 and muscle mass, then the other functions must
19 necessarily suffer as a result.

20 Environmental stressors can further
21 skew the scaled balance, draining resources from
22 these critical areas. This is why we see animals

1 that may appear robust thanks to their ability to
2 turn out large volumes of eggs or produce heavy
3 cuts of meat, but they struggle to simply breathe
4 or walk or to fight off infections and to deal
5 with any stressors such as weather extremes and
6 transport.

7 These unbalanced genetics now dominate
8 U.S. farm animal populations and it appears that
9 a good number of animals raised organically are
10 sourced from these same gene pools, leaving them
11 vulnerable to identical problems.

12 This is compounding by the organic
13 programs lack of comprehensive animal welfare
14 standards which could help mitigate environmental
15 stressors and overall health and well being
16 challenges.

17 Millions of organic animals still
18 contend daily with realities like crowding, poor
19 ventilation, barren environments, lack of
20 sunlight and lack of outdoor access.

21 We look forward to working with the
22 NOSB to identify meaningful standards for

1 stronger genetics that can support all animals
2 raised organically.

3 We appreciate your consideration.
4 Thank you very much.

5 CHAIRPERSON CHAPMAN: Thank you.

6 Any questions for Suzanne? Again,
7 thank you for your testimony here today.

8 Roland, you're here, we're just having
9 a hard time connecting with you. Can you try to
10 talk again to see if you're unmuted?

11 MS. ARSENAULT: Ronald, this is
12 Michelle, we're still not hearing you.

13 CHAIRPERSON CHAPMAN: I'm hearing the
14 typing of numbers, are you typing -- hold on.

15 MR. GONZALES: I'm trying.

16 CHAIRPERSON CHAPMAN: We hear you.

17 MS. ARSENAULT: We can hear you,
18 you're a little faint.

19 CHAIRPERSON CHAPMAN: You're a little
20 faint, so you have to speak up. But, hold on one
21 second, I'm going to go through the people who
22 are on deck and then we'll come back to you.

1 So, if these folks are here, they'll
2 be next, Heidy Lopez, Joseph Similanick, Michael
3 Forrest, Frankie Thorn and then Linley Dixon.

4 Ronald, if you can start with your
5 name and affiliation and go into your comments.

6 MR. GONZALES: I apologize for all the
7 technical problems. I've been trying to connect
8 for a while.

9 Well, good afternoon, my name is
10 Ronald Gonzales, I am the manager of the Resource
11 Department of Dole Pineapple Division in Costa
12 Rica.

13 I truly appreciate the opportunity to
14 address members of the Board.

15 The direct issue that is of great
16 importance for the organic pineapple producers
17 that commercialize their fruit in the U.S.
18 market.

19 I would like to make a comment to
20 support the use of ethylene gas to induce
21 flowering in certified organic pineapple
22 production.

1 First, I would like to refer to a
2 practice in the use of ethylene gas is used for
3 years in pineapples.

4 We have not found any viable
5 alternative in the nation. We have consulted
6 specialists from companies that make products who
7 are using safe bio organic pineapple production.

8 And, we have not been advised of any
9 alternative that we are now aware of to replace
10 the use of ethylene gas.

11 Recently, two --[AUDIO DIFFICULTIES,
12 SPOKE ABOUT ETHYLENE FOR PRESERVING PINEAPPLES]--
13 - took place at University of Costa Rica National
14 University --[AUDIO DIFFICULTIES, SPOKE ABOUT
15 ETHYLENE FOR PRESERVING PINEAPPLES] -- Costa Rica
16 have started to research work to experiments
17 carried out by scientists in Taiwan, in France,
18 looking for alternatives to the use of ethylene
19 gas for flowering in organic pineapples.

20 These studies have already become --
21 [AUDIO DIFFICULTIES, SPOKE ABOUT ETHYLENE FOR
22 PRESERVING PINEAPPLES] -- of ethylene and

1 consequently causing floral depreciation by
2 subjecting plants to stress for a short period of
3 time followed by the application of high ethylene
4 as well as the application of ice cubes.

5 We hope that the very narrow resource
6 of these --- [AUDIO DIFFICULTIES, SPOKE ABOUT
7 ETHYLENE FOR PRESERVING PINEAPPLES] -- will be
8 available for presentation to the board today.

9 I have been informed that the
10 application of ice water and ice cubes did not
11 induce flowering in treating plants. And, if
12 these results become available, understanding
13 that they will be presented before you next week.

14 On the other hand, I would like to
15 turn to the possibility of cultivating pineapple
16 varieties for which the use of ethylene gas to
17 induce flowering is not necessary.

18 In a categorical way, it can -- [AUDIO
19 DIFFICULTIES, SPOKE ABOUT ETHYLENE FOR PRESERVING
20 PINEAPPLES] -- of usage carried by Dole's genetic
21 improvement tools, not a single variety has been
22 obtained for which the use of ethylene is not

1 strictly necessary.

2 Therefore, the organic people at Dole
3 issued out --[AUDIO DIFFICULTIES, SPOKE ABOUT
4 ETHYLENE FOR PRESERVING PINEAPPLES] -- pineapple
5 for which they use the ethylene gas is not
6 required to induce flowering ---[AUDIO
7 DIFFICULTIES, SPOKE ABOUT ETHYLENE FOR PRESERVING
8 PINEAPPLES].

9 Therefore, the company encourage the
10 members of the NOSB Committee to maintain
11 approved use of the ethylene gas as a floral
12 inducer in the production of organic pineapples.

13 The introduction of these inputs would
14 have significant impacts on the ---[AUDIO
15 DIFFICULTIES, SPOKE ABOUT ETHYLENE FOR PRESERVING
16 PINEAPPLES]-- breeding in large climates with the
17 --

18 CHAIRPERSON CHAPMAN: Ronald, we've
19 reached the three minute mark, if you can wrap up
20 your comments.

21 MR. GONZALES: Okay. So, those would
22 be the two comments I wanted to make. Thank you

1 so much for your time.

2 CHAIRPERSON CHAPMAN: Thank you,
3 Ronald.

4 Any questions for Ronald from the
5 Board?

6 COURT REPORTER: I'm sorry to
7 interrupt. Hello? This is the Court Reporter.

8 CHAIRPERSON CHAPMAN: Hello?

9 COURT REPORTER: Mr. Ronald Gonzales,
10 his phone sounds to be on speaker. It won't be -
11 - it won't make a clear record.

12 MS. ARSENAULT: Okay, thanks. So, we
13 can talk offline about that, thank you.

14 CHAIRPERSON CHAPMAN: Yes, that's fine.
15 Okay, Ronald, I'm not hearing any questions from
16 the Board, so thank you for your time.

17 So, I'm going to read those --

18 MR. GONZALES: Yes, so --

19 CHAIRPERSON CHAPMAN: Thank you very
20 much.

21 MR. GONZALES: -- much, I apologize,
22 I was in the speaker. I hope you guys could hear

1 what I had to say.

2 CHAIRPERSON CHAPMAN: Thank you.

3 I'm going to go down the list of
4 speakers who we still haven't been able to
5 identify.

6 So, Heidi Lopez-Rodriguez, are you
7 here?

8 Joseph Similanick, are you here? Michael Forrest?

9 Frankie Thorn, are you here? All right, Linley
10 Dixon, are you here?

11 MS. DIXON: I am.

12 CHAIRPERSON CHAPMAN: All right,
13 Linley, hold on one second.

14 After Linley is Brian Bates who we see
15 is on the line as well. So you're up next.

16 And then, after Brian is Miraj Patel
17 and that is the end of our list.

18 So, at that point, we'll run through
19 the list again, but if no one's here, we will
20 then be wrapping up this webinar.

21 So, Linley, if you could start with
22 your name and affiliation for the record?

1 MS. DIXON: I'm Linley Dixon,
2 Associate Director of Real Organic Project.

3 As many of you know, the Real Organic
4 Project is a farmer driven effort to get organic
5 standards back in line with the law.

6 A few things have become painfully
7 apparent to many in the organic community.

8 First, there are major differences in
9 how certifiers are interpreting the law,
10 encouraging certifier shopping.

11 Second, in some cases, the NOC process
12 for continuous improvement is not functioning as
13 it was intended.

14 And, third, enforcement of the NOP's
15 position, giving an unfair advantage to
16 operations and ACAs that are following that.

17 We should develop the creation of an
18 add-on label. Farms that are qualified for the
19 add-on of fostering soil fertility and pasture
20 access including poultry.

21 These are practices that we feel are
22 inherent to the word organic and the integrity of

1 the label.

2 As NOC members, we urge you to make
3 the Real Organic Project obsolete by continuing
4 to work to prohibit hydroponics and propose the
5 still standing 24 recommendation and the
6 requirement and access and soil fertility.

7 We urge you to continue to advocate
8 for strong animal welfare standards, to fight the
9 rejection of the OICP or the SPA.

10 Our standards are created by the
11 gallant efforts of experts in the organic
12 community and include much of what the organic
13 community has been lobbying for for over a
14 decade.

15 We have standards reflecting soil
16 fertility, origin of livestock and pasturing
17 poultry.

18 The standards are published on our
19 website along with information on how to provide
20 feedback and we welcome input.

21 We visited over 50 organic farms this
22 summer that wanted to participate in our pilot

1 project. Farmers not only provided us feedback
2 on our standards, but they reinforced concrete
3 needs to differentiate real organic practices
4 under the seal.

5 Most of these farms have had a
6 significant shift from the organic wholesale
7 marketplace.

8 Our certified farms have the
9 opportunity to tell others what organic farming
10 is all about through the farmer interviews on
11 their farm.

12 Every operation showed a deep
13 commitment to continuous improvement and the
14 sustainability of all their farm systems.

15 Farmers shared knowledge about how to
16 generate fertility on the farm and reduce the
17 need for unsustainably sourced off farm imports.

18 Their voices are a striking contrast
19 to the certified organic farms whose systems
20 completely depend on imported grain or hydrolyzed
21 protein or fish harvested from the sea.

22 The willingness of farmers to be

1 completely open and transparent about the details
2 of their practices is in line with the spirit of
3 organic farming.

4 Their practices are in line with the
5 organic law as it is written.

6 If you are a member of the organic
7 community and refuse to sit back and watch as the
8 majority of organic farms meeting the letter of
9 the law struggle to complete against the tiny
10 minority of operations that will, please join us.

11 Thank you for listening and your
12 volunteered time.

13 CHAIRPERSON CHAPMAN: Thank you,
14 Linley.

15 Any questions for Linley? All right,
16 hearing none, up next is Brian Bates. Brian, are
17 you on the line with us?

18 MR. BATES: I am, can you hear me?

19 CHAIRPERSON CHAPMAN: Yes, I can.

20 Brian, you're up and then up next is
21 Miraj Patel.

22 Brian, if you'd start with your name

1 and affiliation for the record?

2 MR. BATES: Sure. My name is Brian
3 Bates. I am the owner and primary operator of
4 Bear Creek Organic Farm in Northern Michigan.

5 And, I want to thank you for the
6 opportunity to speak today.

7 My comments pertain to the potential
8 ban of the Japanese paper pot transplanter.

9 We are a 100 percent USDA certified
10 organic farm for the last six years. Prior to
11 starting this farm, we studied organic
12 agriculture at Penn State and helped author the
13 organic crop production guide.

14 Can you hear me? I'm hearing
15 background noise.

16 MS. ARSENAULT: Yes, can you -- people
17 on the line -- can people who are not speaking
18 please mute yourself, we're hearing the
19 background conversation. Thanks.

20 All right, go ahead. Thanks. Sorry
21 about that.

22 MR. BATES: That's okay.

1 And, one of the things that we've
2 learned in trying to be committed to organic crop
3 production since the get-go is trying to navigate
4 the balance in our current agriculture between,
5 you know, what is truly sustainable versus who
6 just meets the bare minimum organic rule and, you
7 know, what sort of embraces the true intent.

8 And so, being schooled from the early
9 pioneers of true organic agriculture, one of the
10 reasons that we use the paper pot system is
11 because all of the farms that we worked on after
12 completing studies at Penn State extensively used
13 black plastic mulch on their farms which was 100
14 percent synthetic, annual use, making contact
15 with the soil and with crops and would break down
16 by the end of the seasons and was not organic in
17 any way whatsoever.

18 We then set out to start our own
19 business that would not use any black plastic
20 mulch, though it was completely allowed to try to
21 farm more in harmony with nature and with what
22 the founders of the organic movement would have

1 wanted.

2 When we came across the Japanese paper
3 pot system, it radically changed our operation
4 from an ecological economic and labor standpoint.

5 One of the things that the paper pot
6 planter has done for us that's most important in
7 our minds is it has allowed us to hire more
8 skilled labor, spend less time doing menial tasks
9 and maximize our efficiency, both in the
10 greenhouse and in the field.

11 Not only has it improved our labor
12 savings, but doing so, it has allowed us to tap
13 into organic market share that was previously
14 unattainable.

15 We've been able to lower the cost of
16 our prices of our top products. And, within one
17 year, every product that we grew with the paper
18 pot transplanter became cash positive when it
19 previously was not.

20 Our concern is that we were given
21 extremely short notice to stop using the paper
22 pot planter which has been used for over a dozen

1 years, wholly certified in the United States.

2 And, with not enough time for a proper
3 review, which we completely support by the USDA
4 and the Organic Materials Research Institute.

5 We are forced to either face our first
6 year of negative growth in 2019, layoff some of
7 our staff in 2019 and forego several thousand
8 dollars of inventory and materials for systems
9 built around this tool.

10 It is no joke that we have told our
11 staff, if this tool is not approved, they will
12 have to consider finding other work.

13 I think I hear my beeper, maybe not.

14 MS. ARSENAULT: It actually --

15 MR. BATES: And so --

16 MS. ARSENAULT: Sorry, Brian, it was
17 the timer going off. Sorry.

18 MR. BATES: Okay, all right, fine.
19 Yes, no worries.

20 CHAIRPERSON CHAPMAN: No, Brian,
21 sorry. Let me -- because the NOSB interrupted
22 you before, you have a couple left for comments,

1 go ahead.

2 MR. BATES: That's fine.

3 All I would like to say is that, we
4 are committed to organic agriculture without a
5 shadow of a doubt. We've help work with our
6 certifiers on a number of issues. We've helped
7 first-wave farmers in our area over a dozen
8 become certified organic in the last five years.

9 We are not trying to wiggle out of
10 anything with a tool like this. But, we've seen
11 farms where black plastic is totally permitted
12 who never get all the plastic out of the field.

13 And, when we use this biodegradable
14 paper product, just because it's not recycled
15 newsprint or cardboard, you can't see any
16 evidence of it within months.

17 So, we are firmly convinced that the
18 net positive from this tool which has no moving
19 parts and no engines and burns no fossil fuels
20 far outweighs a number of other tools that are
21 widely accepted.

22 So, what we're hoping is for at least

1 a stay to pause the suspension of this tool so
2 that there's more time to properly review it
3 because we're confident that with the proper
4 review, this would not be something that you
5 would look to ban in the organic community.

6 Thank you.

7 CHAIRPERSON CHAPMAN: Thank you.

8 Thank you, Brian.

9 Any questions from the Board?

10 MEMBER ELA: Tom, I have a question.

11 CHAIRPERSON CHAPMAN: Sure, go ahead.

12 MEMBER ELA: Brian, I would like to
13 just thank you for calling in and particularly
14 for your clear articulation of the adverse
15 impacts of losing the paper pots on your
16 operation.

17 And, also juxtaposing the use of paper
18 pots against the alternatives or one of the
19 alternatives which is the use of plastics. I
20 think it's a great point that you make.

21 One of the things that the Board, I've
22 found in discussing this with the NOP is that,

1 there's the perception that, you know, that
2 they're not hearing a lot about the need for
3 paper pots. So, your call has been helpful and
4 if we can encourage some of your colleagues also
5 to speak up about this, it could help sway the
6 decision about the state of the paper pots in the
7 near term.

8 MR. BATES: I appreciate that
9 feedback. This is probably the most vocal I've
10 been on some kind of regulatory issue affecting
11 our farm, second only to the Food Safety
12 Modernization Act which we're widely in
13 supportive and have helped other growers around
14 us implement and get acclimated to over the last
15 half dozen years.

16 I think a lot of growers feel like
17 they're too small and that the process is too big
18 to stop. And, I refuse to believe that that's
19 the case because I think one thing that is
20 profoundly unique about the paper pot system is
21 that it is only used by small farms and it only
22 benefits small farms.

1 Once you achieve a certain size, the
2 tool is both irrelevant and not functional.

3 So I think that's one of the unique
4 challenges with this, is it's not widely
5 scalable. We're seeing many conventional growers
6 exploring plant tape based systems such as the
7 ones that they're bringing over from Spain.

8 But, I think in the grower community,
9 banning something like the paper pots has felt
10 like a particular attack on small growers.

11 And, I guess I could see why that
12 might be the case because this tool, other than
13 something like a hoop house has been the most
14 profound innovation on our farm since we've
15 started.

16 So, I really appreciate that feedback
17 and this is definitely the first time I've
18 actively engaged in this process, but it's
19 something that I think the voice is strong, it's
20 just so small, unfortunately.

21 MEMBER ELA: Thank you, Brain.

22 DIRECTOR LEWIS: Brian, this is Paul,

1 if you want to clarify one thing, and I do
2 realize that, from your perspective, this is
3 going to have an economic impact on you if it
4 stands the way it is right now.

5 And, I understand the prospective
6 you're coming from. But, it is somewhat a
7 logistical issue or a regulatory issue, it's not
8 that we're looking to ban something, it's that
9 potentially something was allowed that shouldn't
10 have been allowed in the first place without
11 going through the proper channels.

12 I know that seems like a really small
13 gray area, but when you expand that to the impact
14 it could have on any operation due to the
15 potential use for what would be a synthetic item,
16 it could have some implications there.

17 So, I know for your specific
18 operation, that kind of regulatory speak probably
19 doesn't give you much reassurance, but just so
20 you know, we're not looking to ban this tool on
21 small operators, rather it's just it didn't go
22 through perhaps the proper channels to get

1 approved in the first place.

2 MR. BATES: That sounded definitely
3 clear and I appreciate you saying that. That's
4 something that we actually stayed back on the
5 sidelines for the first two years of its growing
6 popularity concerned that it wasn't totally
7 certifiable.

8 But, it seemed to sort of start
9 receiving unanimous approval for many certifiers
10 and so we then did decide to take the plunge.

11 But, I totally understand what you're
12 articulating and I think most growers also
13 understand that.

14 I think it is the bureaucratic nature
15 of this process that has made it challenging.
16 And, I think the confusion on sort of virgin
17 paper versus recycled paper has caused some
18 consternation amongst growers who are able to use
19 recycled paper all over the place, but then not,
20 you know, virgin paper in a tool like this.

21 DIRECTOR LEWIS: Yes, yes, fair enough
22 and that's a good point. And, like I said, I

1 appreciate the impact that this has on your
2 operation. That's not going unnoticed.

3 CHAIRPERSON CHAPMAN: Any other
4 questions from the Board?

5 MEMBER OAKLEY: Yes, Tom, this is
6 Emily.

7 I just wanted to tell Brian that I
8 really thank you for your comments and agree with
9 Dave that you succinctly echoed a lot of what we
10 discussed on the Crops Subcommittee calls.

11 And, I had one question which is, when
12 were you informed about the 2018 December
13 deadline?

14 MR. BATES: We were informed, I
15 believe, it was I want to say March or April. We
16 first heard about it on Facebook from another
17 grower who was certified by another certifier.
18 And then, it was included in our certifier's
19 newsletter in, I'm going to say maybe April.

20 Just ironically, about a month after
21 we had just purchased \$6,000 of new inventory for
22 this tool system. But, so that's what makes me

1 think April because we've been drawing it prior
2 to that. So, I would say April.

3 MEMBER OAKLEY: Thank you.

4 CHAIRPERSON CHAPMAN: Any other
5 questions for Brian? All right, Brian, thank you
6 for your comments here today.

7 Thank you, up next is Miraj Patel.
8 Miraj Patel here? Miraj, going once. Going
9 twice. Okay, I sent out a broadcast to folks and
10 we haven't heard any messages back. So, I'm
11 going to run through the list of names and if
12 someone's here, then we'll go to them. If not,
13 then we'll be completed with this webinar.

14 So, going down the list from the top,
15 first is Corellia Johnson. Corellia, are you
16 here? Hearing nothing, Ari Davis, are you here?
17 Jamie Barron, are you here? Timothy Opiela, are
18 you here? Tonda Fernando, are you here? Harold
19 Lyles, are you here? Jean Marie Gore Traore, are
20 you here? Inita Patton, are you here?

21 Heidi Lopez-Rodriguez, are you here?
22 Joseph Similanick, are you here? Michael Forrest,

1 are you here? Frankie Thorn, are you here? And,
2 back to Miraj Patel?

3 Okay, it looks like we have now
4 completed all the commenters who are present for
5 the Tuesday webinar before the fall meeting.

6 We'll fall into recess and come back
7 on Thursday for the second of the two public
8 webinars and that will be at, what, Thursday at
9 1:00 p.m. Eastern Time, is that right, Michelle?

10 MS. ARSENAULT: That's correct,
11 thanks.

12 CHAIRPERSON CHAPMAN: All right, thank
13 you again for all the commenters for your time.
14 It's been very valuable to the process and I
15 appreciate the Board for their thoughtful
16 consideration and questions.

17 And, I look forward to talking to
18 folks on Thursday. Take care.

19 (Whereupon, the above-entitled matter
20 went off the record at 3:15 p.m.)
21
22

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A-dae 1:14 9:3,3
abilities 100:15
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C E R T I F I C A T E

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In the matter of: National Organic Standards Board
Fall 2018 Public Comment Webinar

Before: USDA

Date: 10-16-18

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was duly recorded and accurately transcribed under
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FALL 2018 PUBLIC COMMENT WEBINAR

+ + + + +

THURSDAY,
OCTOBER 18, 2018

The webinar was held via telephone at
1:00 p.m., Tom Chapman, NOSB Chair, presiding.

BOARD MEMBERS PRESENT

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HARRIET BEHAR, Vice Chair

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DR. PAUL LEWIS, Ph.D., Director, Standards
Division, National Organic Program

MICHELLE ARSENAULT, Advisory Board Specialist,

National Organic Program

DEVON PATTILLO, Materials Specialist, Standards

Division, National Organic Program

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

2 (1:07 p.m.)

3 MS. ARSENAULT: So, welcome. This is
4 Michelle from NOP again. We're going to do a
5 little bit of housekeeping before we get started.
6 So if you're online, and you're trying to look in
7 through your computer and you can't, there is a
8 dial in number you can dial in on the phone.

9 We tend to get less feedback if you're
10 dialed in on the phone, and if you're using a
11 headset, but some folks have no problem. So it's
12 up to you.

13 We ask that you please stay on mute
14 throughout the call. Background noises are our
15 biggest challenge. We can mute you from our end,
16 but if you're going to be speaking later, then we
17 have to find you in the list and unmute you. And
18 it just takes a little extra time. So we hope
19 that everyone will self-mute themselves.

20 I think we have a pretty good crew.
21 They're pretty well versed in webinars, and we
22 usually don't have any issues. So thank you for

1 that. If you are on a phone that does not have a
2 mute button, you can use star-6 to mute yourself
3 and star-7 to unmute yourself.

4 Let's see. So as a participant, you
5 should see somewhere on the left-hand side of
6 your screen a chat function and a raise your
7 hand. We're asking people not to raise their
8 hands. You have to sign up ahead of time to
9 speak on the webinar. And Tom Chapman, the Board
10 Chair, will call on you when it's your turn, so
11 no need to raise your hands and let us know that
12 you have a question.

13 We're going to be using a timer, and
14 Tom's going to go over this in a bit. People
15 have a three-minute comment time. So we'll start
16 the timer a few seconds after you start talking.
17 And you'll hear a beeping noise at the end of
18 your three minutes. And we ask that you finish
19 your sentence or stop talking at that point.

20 And if you're having any technical
21 issues, the ReadyTalk.com website is to stay on
22 the screen. They have a really good customer

1 service line. There's a phone number you can
2 call. If you want to get immediate assistance,
3 you can chat with them, or you can email them.
4 And they should help you overcome any technical
5 issues that you're having.

6 And finally, we're having a
7 transcript, so there's a transcriptionist on the
8 call with us. So we'll have transcripts of the
9 webinar which occurred on Tuesday, this webinar
10 today, as well as the in-person comments that
11 will happen at the meeting next week in St. Paul.
12 Those will be available a couple of weeks after
13 the meeting concludes.

14 All right. And I'm going to turn it
15 over now to Paul Lewis, the Standards director,
16 who will officially open the meeting.

17 DR. LEWIS: Great, thank you,
18 Michelle. Good afternoon, everyone. I'd like to
19 welcome NOSB members of the public today to the
20 National Organic Standards Board Public Comment
21 webinar. And I appreciate NOSB members
22 participating in this call and for all your work

1 serving on the Board.

2 This webinar provides the opportunity
3 for the public to provide comments to the NOSB as
4 part of the Board's upcoming public, face-to-face
5 meeting scheduled for October 24th/26th, next
6 week in St. Paul, Minnesota. Please consult the
7 NOSB website for further information about the
8 face-to-face meeting.

9 This meeting, like other meetings of
10 the NOP, operates under provisions of the Federal
11 Advisory Committee Act. And I am looking forward
12 to hearing comments from the public to assist the
13 NOSB in preparing their recommendations to the
14 USDA in response to NOSB work agenda items.

15 I want to also thank my NOP Standards
16 Division colleagues for their help behind the
17 scenes to bring it to today's teleconference.

18 Before I turn the meeting over to Mr.
19 Tom Chapman, Chair of the Board, I want to add a
20 personal note. This will be the last public
21 comment webinar for Tom chairing for this NOSB
22 meeting. I want to thank Tom for his outstanding

1 service chairing the NOSB Public Comment Webinar
2 series over the past two years.

3 Tom, your leadership has resulted in
4 the public comment webinar being a seamless
5 process, offering increased access for the public
6 to provide information to the NOSB to assist the
7 Board in the development of recommendations for
8 the Department. Tom, thank you again for your
9 service.

10 Tom, the meeting is yours.

11 MR. CHAPMAN: Thank you, Paul. And
12 thank for those kind words. I value these
13 webinars quite a bit. And I imagine future
14 chairs will also value them just as much and
15 facilitate, I hope, hopefully, as seamless of a
16 meeting as possible, given how much technology
17 and everything else is involved in these.

18 That being said, I'll just say thanks
19 for all the support of the NOSB staff,
20 particularly Michelle, and Devon, to help us
21 identify, hunt down, and figure out whose phone
22 numbers or which individuals are about to speak.

1 So thanks to everyone for making this a success,
2 and we'll get started with my general comments.

3 So again, I'd like to welcome everyone
4 to the second public comment webinar prior to our
5 Fall meeting and appreciate --- just extend a
6 thanks and appreciation for everyone's time,
7 including Board members, and the members of the
8 public who are here to provide their feedback.

9 Michelle, if you could be so kind as
10 to take the roll?

11 (No audible response.)

12 MR. CHAPMAN: Michelle, if you're
13 speaking, you're on mute.

14 MS. ARSENAULT: Sorry, Tom. I was on
15 mute, getting the timer ready. All right. So we
16 have Tom Chapman.

17 MR. CHAPMAN: Present.

18 MS. ARSENAULT: Harriet Behar?

19 MS. BEHAR: Present.

20 MS. ARSENAULT: Scott Rice?

21 MR. RICE: Present.

22 MS. ARSENAULT: Jesse Buie?

1 MR. BUIE: Present.

2 MS. ARSENAULT: Asa Bradman?

3 MR. BRADMAN: Present.

4 MS. ARSENAULT: Hi, Asa. Lisa de
5 Lima?

6 MS. DE LIMA: Present.

7 MS. ARSENAULT: All right. Steve Ela?

8 MR. ELA: Present.

9 MS. ARSENAULT: Thanks, Steve.

10 Dave Mortensen?

11 (No audible response.)

12 MS. ARSENAULT: I'm not seeing Dave
13 at the moment. I will come back to him. Emily
14 Oakley, are you on the line?

15 MS. OAKLEY: Present.

16 MS. ARSENAULT: Okay, Emily. A-dae
17 Briones?

18 (No audible response.)

19 MS. ARSENAULT: I did not find A-dae's
20 number, so let me get back to her. Eric
21 Schwartz?

22 MR. SCHWARTZ: Present.

1 MS. ARSENAULT: Hello, Eric. Ashley
2 Swaffar?

3 MS. SWAFFAR: I'm here.

4 MS. ARSENAULT: All right. I'm going
5 to run back through. So Rick Greenwood is not
6 going to be with us today. He was unable to make
7 it. Dan Seitz was not able to make it. He had
8 some family issues to deal with. And Sue Baird
9 is not going to be with us either.

10 So let me go back here. Dave
11 Mortensen, have you joined?

12 (No audible response.)

13 MS. ARSENAULT: If you're talking,
14 you're on mute.

15 (No audible response.)

16 MS. ARSENAULT: All right. And A-dae
17 Briones?

18 (No audible response.)

19 MS. ARSENAULT: All right. So, Tom,
20 I count ten present.

21 MR. CHAPMAN: Ten present.

22 MS. ARSENAULT: Go ahead.

1 MR. CHAPMAN: Okay. Ten present, so
2 we do have a quorum. And we are expecting Dave
3 and A-dae to dial-in. When they do, we will note
4 it if we noticed it on the call log.

5 So some logistical steps, as Michelle
6 already stated. Please, members of the public
7 and Board members, keep yourself on mute unless
8 it's your turn to talk. It's always easier for
9 individuals to mute themselves. And always be
10 careful, if you have a computer and a phone
11 going, or a speaker phone, because the speaker
12 itself might pick up feedback. Star-6 to mute,
13 star-7 to unmute if you do it on your phone.

14 So we'll start public comments in the
15 order of the list that has been provided. If the
16 commenter isn't present at the time that we call
17 upon them, we'll skip them, but we'll come back
18 at the end as time permits.

19 At the time, going down the list, I'll
20 call the speaker who is up next as well as
21 several speakers after it who are on deck. The
22 program and I try to ID some members ahead of

1 time to make sure the speakers are here. So if
2 we can't ID a phone number, we may ask that you
3 comment into the staff to ID yourself.

4 Also, just be aware that we've had
5 several no-shows on these, and so we may skip
6 several names at a time. So just, if you're on
7 the list, be prepared to speak, I guess, on very
8 little notice.

9 Just so we're prepared, up first is
10 Johnathan Simpson. And we have not identified
11 Johnathan. So if you're on the line, Johnathan,
12 please do comment in to the program so we can
13 identify your phone number. After Johnathan will
14 be Geo Honigford, and then Justin Ellis.

15 When called upon to speak, we ask that
16 speakers give their full name and relevant
17 affiliations for the record. We ask that you
18 disclose all relevant affiliations pertaining to
19 matters of business before the Board. And if
20 members of the NOSB want further clarification, I
21 encourage you to ask questions after the public
22 commenter has finished their comments.

1 Comment times will be three minutes
2 per commenter. Out of respect for the Board and
3 other commenters, I ask that you finish as close
4 to that three minute mark as possible. And,
5 Michelle -- you'll hear a buzzer at that three-
6 minute mark --- and, Michelle, are you ready to
7 play that?

8 MS. ARSENAULT: I am. Here it is,
9 two, one ---

10 MR. CHAPMAN: There you go.

11 MS. ARSENAULT: Does everyone hear
12 that all right?

13 MR. CHAPMAN: Begin with the
14 commenter, and then I'll probably interrupt you.
15 So we just ask that you finish up as close to
16 that as possible. And at that point, I'll
17 facilitate any questions from the Board at both
18 numbers. Just speak up like we did at the last
19 one, and I'll call upon you.

20 We don't take any questions from the
21 public for public commenters, only questions from
22 the Board members. All public commenters are

1 allotted only one time slot, either in person or
2 at one of the webinars, in totality. And then,
3 like Michelle said, there will be transcripts of
4 these calls.

5 Anything else, Michelle?

6 MS. ARSENAULT: No, I think we covered
7 everything.

8 MR. CHAPMAN: All right. Then with
9 that, we'll get this started. And again, first
10 up, Johnathan Simpson, are you here?

11 (No audible response.)

12 MR. CHAPMAN: Johnathan going once,
13 going twice, all right. That was the first one.
14 The next up is Geo Honigford. Geo, are you here?

15 MS. ARSENAULT: Geo is on the line.
16 He is muted. Let me unmute him.

17 MR. HONIGFORD: Hello, can you hear
18 me?

19 MS. ARSENAULT: Geo, you are unmuted
20 now. Go ahead.

21 MR. HONIGFORD: Okay.

22 MR. CHAPMAN: We can hear you now.

1 MR. HONIGFORD: Okay, great. My name
2 is Geo --- Good morning, Geo --

3 MR. CHAPMAN: Geo?

4 MR. HONIGFORD: Hello?

5 MR. CHAPMAN: So after Geo will be
6 Justin Ellis and then Mary Cox. Geo, you can
7 start with your name and affiliation for the
8 record and then go on with your comments.

9 MR. HONIGFORD: Great. My name's Geo
10 Honigford. I run Hurricane Flats Farm. I'm a
11 certified organic farmer in Vermont, certified by
12 Vermont Organic Farmers.

13 So I want to talk about the paper pot
14 transplanter. I've been using this since it
15 first --- since I first found out about it and
16 was the first farmer in Vermont to use it. So
17 it's been eight or ten years I've been using it.
18 It's a crazy appropriate technology for a farm my
19 size.

20 Basically, I'm sort of in the \$150,000
21 a year category for a small vegetable farm and
22 often don't even have enough employees on my farm

1 to run any kind of --- other kind of transplanter
2 which would take three people, one on a tractor
3 and two on the back. This is something that
4 plants just as fast, and it just takes one
5 person.

6 And so I think -- I know that they're
7 working on redeveloping a formula for the paper.
8 And I think they should be given time at minimum
9 to allow this to happen.

10 When I look at other things that are
11 happening in the world of organic farming, I look
12 at some of my neighbors who use reams of plastic.
13 I mean, we talk about sustainability and what
14 sustainable practices are. I mean, here in
15 Vermont this time of year there's dumpsters full
16 at the vegetable farms, organic certified
17 vegetable farms, filling up with plastic that
18 they use just for weed control. I mean, we're
19 not looking at those issues.

20 I also make a lot of hay. And the
21 twine I use on my baler has been treated, and
22 that's allowable, because there are no other

1 sources. If you use non-treated twine, it just
2 rots and the bales will fall apart. So we've
3 allowed some usage of different things when it
4 becomes appropriate. And I think this is an
5 appropriate one.

6 So that sort of concludes my comments.

7 MR. CHAPMAN: Thank you, Geo. Any
8 questions from anyone on the Board? Any
9 questions from the Board members?

10 MS. OAKLEY: Tom, this is Emily.

11 MR. CHAPMAN: Emily, go ahead.

12 MS. OAKLEY: Thank you. Thank you for
13 your comments. I wanted to ask you, when you
14 found out that this particular pot transplanter
15 is going to be discontinued for use at the end of
16 this year, December 2018, do you ---

17 (Telephonic interference.)

18 MR. HONIGFORD: So I didn't catch the
19 question. It was kind of garbled. So if someone
20 could repeat that on a clearer line?

21 MR. CHAPMAN: Yes. Emily, you're a
22 little quiet, but Emily asked just when you found

1 out that paper pots would not be allowed for the
2 next ---

3 MR. HONIGFORD: When did I find out?

4 MR. CHAPMAN: Yes. When were you
5 informed?

6 MR. HONIGFORD: I think it started
7 this past growing season. I can't exactly pick a
8 date. But I think it was just before we started
9 in March or April. But I don't know exactly when
10 it was.

11 MR. CHAPMAN: Emily was that ---

12 MR. HONIGFORD: What was that?

13 MS. OAKLEY: Yes.

14 MR. CHAPMAN: I'm asking Emily was
15 that not ---

16 MS. OAKLEY: Yes.

17 MR. MORTENSEN: I had a quick
18 question.

19 MR. CHAPMAN: Dave is here. Dave, go
20 ahead.

21 MR. MORTENSEN: Yes, this is Dave
22 Mortensen. And thank you for the call. Could

1 you explain for us how it is that the paper pots
2 are helping you with your weed management?

3 MR. HONIGFORD: Well, they don't help
4 with the weed management. But it helps with my
5 planting. I can plant -- basically, on a tray of
6 onions I can plant 500 plants in about two
7 minutes which would have been pretty laborious
8 doing it by hand. And I could do that as one
9 individual.

10 I can plant faster with the paper pot
11 transplanter than you do with a mechanical
12 transplanter. So it has enabled me to increase
13 my production without increasing my labor costs.
14 Because I can plant so much quicker cheaper.

15 MR. MORTENSEN: Right. And could you
16 just then explain how it is that it helps you to
17 not rely so heavily on plastic?

18 MR. HONIGFORD: You can't use plastic
19 with the system. Because you can't -- there's
20 no way of poking holes through the plastic to get
21 the chain to work. The chain needs to --- you
22 need to pull it along the ground. You need a

1 continuous strip to operate it. So there's no
2 way you could use plastic with this system unless
3 you put the plastic on later and cut around it,
4 which would be laborious.

5 MR. MORTENSEN: Yeah, thanks.

6 MR. CHAPMAN: But, yeah, just to
7 clarify that point, the plastic -- and your point
8 of reference is a black plastic. It's not an
9 alternative to this. Black plastic won't mulch--

10 MR. HONIGFORD: No.

11 MR. CHAPMAN: -- for a different
12 purpose. You're just ---

13 MR. HONIGFORD: Correct.

14 MR. CHAPMAN: -- saying that you see
15 a lot of waste in the black plastic, and you see
16 value in this --

17 (Simultaneous speaking.)

18 MR. HONIGFORD: I'm sorry if people
19 think I'm conflating the two, I'm not. They're
20 two different things. But I'm simply trying to
21 point out that we allow unsustainable practices
22 to go on in the organic world. And since so many

1 people use black plastic, we kind of turn a blind
2 eye to it even though, I think, in my opinion,
3 that's a much more unsustainable practice than
4 the use of a paper pot transplanter.

5 MR. CHAPMAN: All right. Did you have
6 a question for Geo?

7 (Simultaneous speaking.)

8 MS. BEHAR: That's a really a good
9 question. You talked about using your baling
10 twine. How do you use your hay? Do you mulch
11 with that, or do you remove the twine prior to
12 using the hay?

13 MR. HONIGFORD: Yeah, yeah. If we use
14 it for mulch, we remove the twine, because that's
15 not organically approved to put into the ground.
16 But most of the hay we produce, we sell to the
17 horse people for feed.

18 MS. BEHAR: Thanks. That was just a
19 side tangent.

20 MR. CHAPMAN: All right. Not hearing
21 other commenters, Geo, since you mentioned it,
22 I'm just going to ask real briefly, what are your

1 thoughts on biodegradable plastic mulches --

2 MR. HONIGFORD: I have never --- I
3 obviously have never used one, given that I'm
4 certified. I would love to be able to try to use
5 it. I've heard they don't break down very well
6 and you end up with a lot of trash in the field
7 until they break down. So I think I'd give it a
8 shot. So I guess I'm okay with doing it. But
9 I'd rather use that than black plastic,
10 obviously.

11 MR. CHAPMAN: All right. Thank you --

12 MS. BEHAR: I have one more question.

13 MR. CHAPMAN: Oh, Emily -- or, I'm
14 sorry, Harriet. Go ahead.

15 MS. BEHAR: Hi. So if you have to
16 give up your organic certification in order to
17 keep using the paper pots, do you anticipate
18 that, if and when they are allowed, you would
19 come back to organic certification?

20 MR. HONIGFORD: Yeah. I'm not saying
21 I would give up my organic certification. I'd
22 probably look to switch to another type of

1 transplanter that would increase my cost,
2 increase my labor force. But it could be a route
3 that I go, to just dropping my certification. I
4 don't know. I'd have to give it long and deep
5 thought. I don't have an answer to that
6 question.

7 MS. BEHAR: Okay, thank you.

8 MR. CHAPMAN: Okay.

9 MR. HONIGFORD: But I appreciate
10 everybody's time. Thank you very much.

11 MR. CHAPMAN: Yeah, appreciate your
12 time too. And thank you for your comments.

13 MR. HONIGFORD: All right. You're
14 welcome. Bye-bye.

15 MR. CHAPMAN: Yes. Before we move on
16 to more commenters, just for the record, Dave is
17 now present, as you could tell from his question.
18 And then A-dae, I believe, is also on the line
19 with us. A-dae, can you say present if you're
20 here?

21 (No audible response.)

22 MR. CHAPMAN: A-dae might be on mute.

1 A-dae, are you here? I got a text from you
2 saying you joined.

3 (No audible response.)

4 MR. CHAPMAN: All right. Still not
5 hearing from A-dae. We'll check in a moment
6 again.

7 So next up on the commenter list is
8 Justin Ellis. After Justin is Mary Cox. Mary
9 Cox, we haven't identified you yet on the list.
10 After Mary is Michael Moss. Have we identified -
11 - yeah, Michael is here.

12 So, Justin, can you hear us?

13 MR. ELLIS: Yes, I can.

14 MR. CHAPMAN: And we can hear you.
15 You can start with your name and affiliation.

16 MR. ELLIS: Sure, yeah. Justin Ellis.
17 I work for the Dramm Corporation, Manitowoc,
18 Wisconsin. We produce a liquid fish hydrolysate
19 fertilizer for use in organic growing.

20 MR. CHAPMAN: Great, and just proceed
21 with your comments.

22 MR. ELLIS: Okay. Thank you all for

1 the opportunity, for allowing me to address you
2 today. Specifically, I'm addressing the
3 questions regarding testing the proper amount of
4 acid used by liquid fish fertilizers.

5 So hydrolysate liquid fish fertilizers
6 typically remove no components from the fish
7 scraps used in the production process, that is no
8 compound proteins, microbiology, et cetera, is
9 removed for other food or industrial processes.

10 This creates more acid living solution
11 that requires the addition of allowed acids plus
12 stabilities. Without acid, the product is
13 strictly rendered unusable and no longer an
14 efficacious fertilizer.

15 An upward drift in the pH level occurs
16 as part of the normal production process in which
17 hydrolysates which do not strip out physical
18 ingredients such as bone oils. For example, it
19 is well understood that adding calcium to various
20 compounds or solutions will increase their pH.
21 The fish bones, which remain and continue to
22 break down in fish hydrolysate solutions as they

1 age, are one of the many factors affecting the
2 upward drift.

3 The Dramm Corporation has conducted
4 trials which indicate that the amount of total
5 acid required to maintain a pH level equal to or
6 greater than 3.5 throughout the production
7 process is 90 percent greater than what would be
8 needed to maintain stability and yield a product
9 with pH as equal to or greater than 3.5 if the pH
10 level was allowed to drop below that threshold as
11 has been stated in the process.

12 Specifically, a greater dose of acid
13 is added to fish off of slurry at the initial
14 stage of production, such that its pH level drops
15 below 3.05, it will eventually rise to a level
16 greater than 3.5 as the solution ages in the
17 vault throughout the production process. It
18 ultimately gains a more stable character and
19 consistency throughout the process.

20 Additionally, Dramm has engaged a
21 third party laboratory to conduct inoculation
22 analysis to test the viability of harmful

1 bacteria surviving the introduction from outside
2 sources during and after the production process
3 at different pH levels.

4 These tests have concluded that, at a
5 pH level of 3.5, the fertilizer blend was
6 effective in achieving the greater than 5-log
7 reduction against E-coli and Salmonella after 24
8 hours and greater than 6-log after 48 hours.

9 It concluded that a minimum of 72
10 hours whole time was required to eliminate the
11 survival of these harmful bacteria. At a much
12 higher pH level of 4.9, it took much longer for
13 the bacteria kill stage to be affected, including
14 that and eight-day whole time was required to
15 eliminate the survival of these bacteria.

16 While no specific quantitative scale
17 was identified, the results strongly suggested,
18 as pH rises, the risk of the presence of harmful
19 bacteria increases exponentially. In short,
20 lower pH levels are necessary to ensure that
21 contamination of harmful bacteria cannot occur.

22 So in conclusion, as we have

1 consistently practiced to date, Dramm Corporation
2 is committed to maintaining a pH level of 3.5 or
3 higher in its products' final form prior to their
4 sale and shipment from our facilities.

5 I would respectfully ask the Board to
6 consider lowering the pH level guidance to a
7 value closer to 3.0 in order to allow for the
8 highly variable nature of the premature fish
9 hydrolysate solutions. Thank you.

10 MR. CHAPMAN: Thank you, Justin.
11 Comments from the Board, or any questions from
12 the Board?

13 MR. BRADMAN: I have a question.

14 MR. CHAPMAN: Asa?

15 MR. BRADMAN: Two questions, one, what
16 acids do you use to bring it down to screen? And
17 then also, you mentioned you used fish scraps. I
18 just wanted to confirm whether you also use any
19 other sources of fish, such as wild fish stocks,
20 for your production?

21 MR. ELLIS: Sure. So the majority of
22 the acid that we use is food grade phosphoric

1 acid. We also use, for one of our blends,
2 sulfuric acid, which are the two that are
3 approved for use in our production.

4 And the second part of your question,
5 we are using scrap fish from the Great Lakes
6 commercial fishing fleet. So we get the scrap
7 after the filets and other parts for human
8 consumption have been removed. So we use no wild
9 caught targeted fish species. For our industry,
10 we use by-products of the commercial fishing
11 fleets here in the mid-west.

12 MR. BRADMAN: In the final product, is
13 the phosphoric acid a significant source of
14 phosphorus from the final product?

15 MR. ELLIS: We get a good portion of
16 our phosphorus from the bone that we let digest
17 in the fish, hydrolysate fertilizers. It's not a
18 significant part of, I wouldn't say. It's
19 certainly a part. But as much or more so comes
20 from the fish carcasses themselves.

21 MR. BRADMAN: Thank you.

22 MR. CHAPMAN: Other questions?

1 MR. ELA: Tom, I have a question.
2 This is Steve. I just want to be clear. From my
3 understanding of your comment, you would love to
4 see the pH recommendation drop to 3.0 from 3.5.
5 But if we leave it at 3.5, are you in favor or
6 against having just the 3.5 at the end of the
7 process versus trying to maintain it at 3.5
8 during the process?

9 MR. ELLIS: Yeah, I believe we'd
10 rather have it at 3.5 at the end. Our studies
11 have shown that it requires a lot more of the
12 phosphoric acid to maintain that 3.5. As the
13 solution ages, it would have to be a further
14 addition to keep it down at that 3.5.

15 Where, as I said, if we're able to
16 dose it with a little higher at the beginning of
17 the process, bring the pH down closer to three,
18 it requires much less acid overall added to the
19 product. Because it doesn't tend to rise, the pH
20 doesn't tend to rise as it ages.

21 MR. ELA: Great. I just wanted to
22 make sure I understood that correctly. So thank

1 you.

2 MR. ELLIS: Yes.

3 MS. BEHAR: This is Harriet. So I'm
4 just kind of wondering, I think your process is
5 somewhat unique in how this might affect other
6 people who make fish emulsion if it was lowered
7 to 3.0.

8 MR. ELLIS: Well, we're making a fish
9 hydrolysate which is quite a bit different than
10 fish emulsion. There's a number of other
11 companies primarily based out on the East Coast
12 that also make fish hydrolysate.

13 Fish emulsions tend to be a heated
14 product where oils, and potentially bone meals,
15 and other collagens, and other products are
16 removed from the product as it's being processed.
17 So I'm guessing that other hydrolysate
18 manufacturers would run into the same issues that
19 we have in that the addition of acid at the
20 beginning will slow the evolution and the upward
21 rise in pH.

22 And, you know, we've found that this

1 bony fish that we use here in the Midwest, that
2 that happens fairly quickly. And potentially the
3 guys on the East Coast, if they're dealing with
4 more cartilage at the base, they might not have
5 the same issues that we do.

6 MS. BEHAR: Thank you.

7 MR. CHAPMAN: Any other questions for
8 Justin?

9 Justin, I just want to follow-up on
10 your written comments on what answered to AFIS.
11 So you don't use -- you don't use whole fish
12 unless it comes to you via an agency or something
13 for invasive control. What's the reasoning for
14 not using the whole fish? Is it an economic --

15 MR. ELLIS: No. I think it's more of
16 just the ethics of how we're trying to -- we're
17 trying to divert a potential waste stream. And
18 the company started by scraping alewives, which
19 were a herring-type fish, off the shores in
20 northeastern Wisconsin.

21 And it's primarily a waste stream
22 diversion that's really grown. We do get some

1 invasive Asian carp occasionally, but it is not
2 something that we've ever spent time researching
3 or been interested in. I just want to be
4 procuring whole fish. You know, we're not
5 interested in catching wild fish just to grind
6 them up and turn them into a fertilizer.

7 MR. CHAPMAN: Are you aware of
8 competitors that have that as part of their
9 supply chain, or is that common in this
10 marketplace, the whole fish -- whole fish?

11 MR. ELLIS: As far as I know, there
12 are some emulsion companies that do target whole
13 fish with the idea that they will be caught --

14 (Telephonic interference.)

15 MR. ELLIS: -- for fertilizer. But
16 I'm not sure as far as the hydrolysate companies
17 how they're sourcing whole fish.

18 MR. CHAPMAN: Okay. Thank you very
19 much.

20 MR. ELLIS: Thank you.

21 MR. ELA: Tom, I have a ---

22 MR. CHAPMAN: Oh, go ahead.

1 MR. ELA: Tom, I have a follow-up
2 question.

3 MR. CHAPMAN: Go ahead, Steve.

4 MR. ELA: Yeah, this is Steve. Could
5 you just -- you talked about hydrolysate and
6 emulsion products. Could you clarify the
7 difference between the two for me?

8 MR. ELLIS: Sure. So what we make is
9 a -- it's a hydrolysate product. So we're
10 getting the fish scraps in. It's not any real
11 big secret to it. We grind them up, and then we
12 do a secondary grind. We add it to a tank.

13 And what's happening is the enzymes
14 that are naturally present in the fish themselves
15 are what's actually breaking the fish down,
16 breaking the product down into a liquid once it's
17 in our storage tanks. It's done at very low
18 temperatures. And the hydrolysates generally
19 aren't removing any products or anything else.

20 Where emulsions, they start with
21 mainly fish scrap or a whole fish that are being
22 ground up. And then it's usually heated up,

1 because they're looking to extract oils. Those
2 oils can go into the cosmetic industry, they can
3 go into the, like, fish oil for human consumption
4 industry.

5 Sometimes they'll also remove the bone
6 then at that point. And that could be sold as
7 bone meal. And what you're left then is sort of
8 a concentrated, usually a higher nitrogen, lower
9 phosphorus, lower potassium product that is quite
10 a bit different than the hydrolysates that we
11 make.

12 MR. ELA: Thank you.

13 MR. ELLIS: You're welcome.

14 MR. CHAPMAN: Okay. Justin, thank you
15 again for your time --

16 MR. ELLIS: Thank you guys.

17 MR. CHAPMAN: -- and your comments
18 here. So up next we have Mary Cox, and then on
19 deck is Michael Moss, and then Jay Kurtz. Mary,
20 are you here?

21 MS. COX: Yeah, we're here.

22 MR. CHAPMAN: Excellent. We can hear

1 you. Mary, you can start with your name and
2 affiliation and then proceed into your comments.

3 MS. COX: Okay.

4 MS. ARSENAULT: Tom, I'm sorry. If I
5 could interrupt just for one second to remind
6 Mary. I have your PowerPoint slides loaded, and
7 you'll have to cue me to advance to the next
8 slide.

9 MS. COX: Okay. So it's my cousin,
10 Conor Buckley, and we both work with Socius
11 Ingredients. And we're both going to speak. So
12 Conor is going to start, Conor Buckley, on Page
13 1.

14 MR. CHAPMAN: So just --- Mary, sorry,
15 it's a formality of our process that we only
16 allow one speaker at a time for a slot. So we're
17 going to need ---

18 MS. COX: Oh.

19 MR. CHAPMAN: -- either you or Conor
20 to speak but not both. I apologize.

21 MS. COX: Okay, okay.

22 (Off-record comments.)

1 MS. COX: You know, so I am going to
2 talk about the challenges in securing organic
3 tamarind seeds. Because I think that was one of
4 -- some comments that were online, if that's
5 okay.

6 MR. CHAPMAN: Yes, go for it.

7 MS. COX: Okay.

8 MR. CHAPMAN: And I will start your
9 time now. But if you could start with your name
10 and affiliation for the record.

11 MS. COX: Okay. So I'm Mary Cox, and
12 I work with Socius Ingredients. And on Page 2 of
13 the PowerPoint, the company was formed in 2000
14 for a food ingredient company. And we're focused
15 on proteins, natural colors and hydrocolor
16 corollaries.

17 So tamarind seed gum is Glyloid brand,
18 and it was manufactured --- oh, do you mind going
19 onto Page 3 --- manufactured by DSPG in Goyko in
20 Japan. In 2004, it got FDA generally recognized
21 as safe accreditation. And in 2018 --

22 (Telephonic interference.)

1 MS. COX: -- Canada accreditation.

2 So I'm going to talk about the
3 challenges in securing organic tamarind seed.
4 Just as a reminder, the tamarind tree produces a
5 pod-like fruit. When someone thinks of tamarind,
6 they are referring to the pod, but 34 percent of
7 the pod is actually seeds.

8 Tamarind seed gum is made from the
9 seeds. And while they're part of the commercial
10 part of the pod, the seeds are underutilized
11 byproducts. There are many applications possible
12 with the seeds, but at the moment their
13 commercial use is limited to the textile, paper
14 binding, and food additive industries.

15 Would you mind going onto Slide Number
16 5, please?

17 So the epoxy and other applications of
18 the gum are directly linked to the procurement of
19 the best quality seeds. DSPG sources the
20 tamarind kernel and powder from India and
21 Thailand. Seventy-eight percent of the seed is
22 kernel. The seed must be wilted to remove the

1 kernels from the shell, and afterwards then the
2 kernel can be transported to another factory for
3 grinding and grating into powder.

4 In India, the seeds there are procured
5 from wide and vast geographical areas and are
6 sold in open markets. The textile industry is
7 very large in India and seeds are mostly used as
8 sizing agents to help strengthen yarn.

9 Only a select amount of white seeds
10 are used for gum manufacture. However, seeds for
11 both industries are roasted and grinded in the
12 same plants. The food additive industry is too
13 small to have separate roasting and grinding
14 plants.

15 In Thailand, Tamarind trees grow
16 naturally wild across the country. Seeds are
17 generally discarded as waste, but some farmers
18 manually removed the seeds from the pod as a side
19 job. DSPG is the only company purchasing
20 tamarind kernel powder from Thailand.

21 We contacted the Organic Certification
22 Board in Thailand, ACT, but we weren't able to

1 procure organic certified seeds. In our
2 research, we contacted organic tamarind suppliers
3 in Thailand and India. But each time they can
4 only provide us with organic tamarind pulp
5 powder.

6 Organic pulp can't make tamarind seed
7 gum. If they are organic certified fruit, we
8 can't guarantee these seeds will be the highest
9 quality for tamarind seed gum. To add to the
10 complexity, roasters and grinders would also need
11 to become organic certified. In India, the
12 amount of seed for their food industry is so
13 small compared to the textile industry that
14 there's really no incentive for these plants to
15 become organic certified.

16 And finally, where we've used tamarind
17 seed gum, it can -- it can be substituted for
18 PGA, and polysorbates, and other ingredients.

19 MR. CHAPMAN: Thank you, ma'am. And
20 then I have to stop you ---

21 MS. COX: Okay.

22 MR. CHAPMAN: -- I'm going to have to

1 stop you there since you've reached your time.

2 But are there any questions from the Board?

3 MS. BEHAR: Yes. This is Harriet.

4 Have you tried to work with growers that
5 currently provide the tamarind seeds that you're
6 using for making into gums and see if they will
7 get certified?

8 MS. COX: So we have contacted,
9 through DSPG in Japan, the tamarind kernel powder
10 suppliers. Because DSPG gets the powder from
11 India and Thailand. And we have contacted them.
12 And they -- right now, at the moment, they say
13 that it's unavailable.

14 The growers are, like, in Thailand,
15 the trees are just -- they're naturally growing
16 around the country. And small farmers are
17 picking it up as a side job. And then in India,
18 the main reason that seeds are collected is for
19 the textile industry. But we've done, like, the
20 research with contacting organic certifiers, et
21 cetera.

22 MS. BEHAR: So from what I can see on

1 the National Organic Programs' Organic Integrity
2 Database, it seems that there is some organic
3 tamarind seed available. So I'm just kind of
4 wondering about have you tried to facilitate the
5 production of the tamarind seed gum by working
6 with organic tamarind seeds or with the ---

7 (Simultaneous speaking.)

8 MS. BEHAR: Go ahead.

9 MS. COX: Yes. On the National
10 Organic Database, there is organic tamarind
11 powder and pulp. But there isn't organic seeds,
12 from my search. But if there was seeds, then we
13 would definitely be open to use organic seeds if
14 they were the right quality for the gum.

15 MS. BEHAR: All right, thank you.

16 MR. CHAPMAN: Any other questions for
17 Mary?

18 (No audible response.)

19 MR. CHAPMAN: Mary, I have a question.
20 You talked about the sourcing in India through
21 open air markets. I'm not sure everyone on the
22 Board may be familiar with that. Are you able to

1 describe that in any more detail of, like, what
2 that is, how that functions, the number of
3 operators that may be involved?

4 MS. COX: As much as I know about
5 this, the seeds are mainly used in the textile
6 industry there. And they're collected from, like,
7 all around India and sold. And that's all I know
8 so far on that. They do go to roasters, and they
9 can be different plants, manufacturing plants
10 that roast them. And then they're transferred to
11 be ground in other manufacturing plants.

12 MR. CHAPMAN: Okay.

13 MS. COX: Yes.

14 MR. CHAPMAN: Can you ---

15 MS. COX: I feel like --- it seems
16 like it's very disorganized there and that the
17 seeds, you know, are the by-product of the
18 tamarind industry with the cause.

19 MR. CHAPMAN: Okay. Thank you. I
20 believe we don't have any other comments or
21 questions for you, Mary.

22 MS. COX: Okay.

1 MR. CHAPMAN: So thank you for your
2 time.

3 MS. COX: Thank you for your time.

4 MR. CHAPMAN: Okay. Up next we have
5 Michael Moss, followed by Jay Kurtz, and then
6 Michael Luna on deck after that. Michael Moss,
7 are you here with us?

8 MR. MOSS: I am.

9 MR. CHAPMAN: All right, we can hear
10 you. You can start with your name and
11 affiliation for the record.

12 MR. MOSS: Thank you. My name is
13 Michael Moss. And I'm an organic farmer in
14 Boulder County, Colorado, certified by OPIA and
15 speaking on my own behalf.

16 Thank you for the opportunity to
17 comment on the use of paper pots in my OSP. In
18 the past, I have used cardboard and newspaper as
19 mulches to help combat weed pressure and also
20 help build compost.

21 All of these materials were of varying
22 qualities, with various inks, protective gloss

1 layers, and materials that I've started to feel
2 uncomfortable with in the organic system. My
3 focus as a farmer is to grow the highest
4 nutritional quality produce possible, and it
5 starts with my soil. In light of this inner
6 conflict, I stopped --

7 (Telephonic interference.)

8 -- I stopped using waste stream
9 cardboard and paper in my operation. Four years
10 ago, I started using the paper pot system, as I
11 felt comfortable with the material. And --

12 (Telephonic interference.)

13 MR. MOSS: -- accounts for
14 approximately 20 percent of my yearly --

15 (Telephonic interference.)

16 MR. MOSS: This allows me to have a
17 higher germination rate and a reduced weed
18 pressure. I also find that the use of this
19 system is a huge labor savings for my farm,
20 helping us achieve higher levels of
21 sustainability.

22 I have seen that, even in the dry

1 front range of Colorado, that the paper pots
2 breakdown in the soil without any noticeable
3 detrimental effects. When I decided to become
4 certified two years ago, OTIA was very diligent
5 in their process of certifying my farm. This
6 included approval to use the paper pots as part
7 of my LST.

8 This process took months and much
9 research on their part. One of my largest items
10 by revenue is a salad mix. This mix is made up
11 of fully matured lettuce heads that are harvested
12 and then mixed to create a nutrient dense weed
13 free salad mix.

14 We use the paper pots to plant over
15 4,000 heads of lettuce each week in our growing
16 season. Without the paper pot system, we'll be
17 forced to move to hand planting starts or a
18 direct seated salad mix.

19 Both of these current options will be
20 highly detrimental to the value and success of
21 these products. It's my request that the NOSB
22 complete a full technical review of the paper

1 pots in organic systems.

2 Organic farmers like myself who
3 utilize the paper pots still have on hand
4 supplies that we are not able to use during most
5 recent growing season. I request that organic
6 farmers that have been approved by the certifiers
7 use this material to continue to use the paper
8 pots during this review period so as not to waste
9 money and materials.

10 As an organic farmer, I'm committed to
11 soil health and organic standards, but I also
12 must balance the viability and longevity of my
13 operation and its impact on my community, family
14 and staff.

15 I have been in discussions with OCIA,
16 but I may need to no longer certify as organic
17 all the parts of my farm if I cannot use the
18 system. This decision process pains me deeply as
19 I am fully committed to the principle of organic
20 and regenerative farming.

21 But thank you for your time. I hope
22 that you can support the petition to allow the

1 use of paper pots on certified organic farms and
2 uphold technical review of the materials.

3 MR. CHAPMAN: Thank you, Michael. Any
4 comments for Michael or any questions for
5 Michael?

6 MS. BEHAR: I have a question.

7 MR. MORTENSEN: And I have one as
8 well.

9 MR. CHAPMAN: So we'll go with Harriet
10 and then Dave. Harriet, go ahead.

11 MS. BEHAR: Do you use paper in any
12 other way on your farm, as a compost feed stock,
13 or as a mulch?

14 MR. MOSS: I do not. I've moved to
15 growing my own mulches through cover cropping,
16 and either mulching that in place on the fields,
17 or harvesting that sort of used as compost.

18 MR. MORTENSEN: So to the decision to,
19 you know, sacrifice your certification is a
20 pretty extreme one. Could you, you know,
21 identify, like, the one or two constraints that
22 make this particular loss of this tool so

1 important to your operation?

2 MR. MOSS: Well, in Boulder County, we
3 are a rapidly gentrifying population, and labor
4 constraints are the number one greatest challenge
5 to myself and other farmers in the county. As
6 Colorado raises the minimum wage, it's really
7 hard for us to find people who can support the
8 work of the farm.

9 So by having to move to hand planting
10 each succession of lettuce, we're just not going
11 to have the bodies to grow this product. And
12 this is a product that I actually put out in a
13 labeled, branded clam shell to compete against
14 imported lettuce products from other parts of the
15 country. And it's really taking off and has been
16 a great exposure for our farm.

17 MR. MORTENSEN: Thank you.

18 MR. CHAPMAN: So, Michael, definitely
19 this is -- economics is the reason for it.
20 Otherwise, you'd have trouble making a
21 profitable, competitive product.

22 MR. MOSS: I would say economics is a

1 large component of it. Also for us, these soils
2 that I'm on, publicly owned land, Boulder County
3 open space, the weed pressure and the soil
4 conditions are very challenging. So with the
5 paper pot system, I can transplant a start very
6 rapidly into a freshly cut bed.

7 So I'm getting a head start on my weed
8 management. And then I can come in with basket
9 weeders or tools to be able to manage the weeds.
10 As our properties improve, hopefully this is will
11 go down, but right now, labor and weed pressure
12 are some of my biggest concerns on the farm.

13 MR. MORTENSEN: Could I just ask one
14 more question?

15 MR. CHAPMAN: Yes.

16 MR. MORTENSEN: Could you explain for
17 the Board how it is that the transplanting helps
18 your weed management?

19 MR. MOSS: Of course. So on the paper
20 pot system, we start this --- we'll start a tray
21 of lettuce in our greenhouse. And we would
22 direct feed it. It would germinate, and we'd get

1 to the point where it's about the third set of
2 true leaves, maybe the second set of true leaves.
3 That's when we'd transplant them in the field.

4 So before we transplant, we will go
5 through and do a final prep stage which may be
6 tilling or flame weeding the beds. And then we
7 will plant the paper pots.

8 So at that point, the head start is
9 weeks over the weeds. So now we can come in with
10 hand tools or our mechanized tools when the weeds
11 are at thread stage and the lettuces are fully
12 growing.

13 MR. MORTENSEN: Thanks. So there're
14 some clear agronomic as well as economic reasons,
15 and labor, to have access to the tool. Thank
16 you.

17 MR. MOSS: Correct, thank you.

18 MR. CHAPMAN: Any other questions?

19 MS. OAKLEY: Tom, can you hear me,
20 this is Emily.

21 MR. CHAPMAN: You're a little quiet,
22 Emily, but go ahead. If Michael can't hear it,

1 I'll try to repeat the question. Emily, go.

2 MR. MOSS: I can hear.

3 MS. OAKLEY: I'm talking a little
4 louder. I just wanted to let you know that the
5 Board has discussed this at length on the Crop
6 Subcommittee. And we'll be discussing it at the
7 meeting.

8 Our current limitation right now is
9 that we received the petition for the material
10 too late in the process to have it on this
11 meeting's voting docket.

12 Because we really just had a couple of
13 weeks turnarounds between each meeting, and
14 really we would have to have a proposal ready for
15 this meeting. And that didn't give us sufficient
16 time to discuss whether or not we needed a
17 technical review, et cetera.

18 So right now, hopefully, we'll be able
19 to have some dialogue with the National Organic
20 Program to see if there might be the possibility
21 of an extension of that 2018 deadline. They have
22 some concerns about precedent setting, but we're

1 hoping that we might be able to continue that
2 dialogue at this meeting and -- further back
3 won't even be the product.

4 So I just wanted to give you a little
5 bit of the background of how that process works.
6 And thank you so much for your comments.

7 MR. MOSS: Great. Thank you for the
8 explanation.

9 MR. CHAPMAN: Any other questions
10 from Board members?

11 (No audible response.)

12 MR. CHAPMAN: Hearing none, Michael,
13 again thank you very much for your time and your
14 detailed testimony here.

15 MR. MOSS: Thank you.

16 MR. CHAPMAN: So up next we have Jay
17 Kurtz, followed by Matthew Luna. Matthew Luna,
18 we haven't been able to identify you on the list.
19 So if you're there, please text us in, and then
20 after Matthew is Patty Lavera. Jay, are you on
21 the line with us?

22 MR. KURTZ: I am.

1 MR. CHAPMAN: All right, Jay. You can
2 start with your name and affiliation for the
3 record.

4 MR. KURTZ: Thank you, Tom. My name
5 is Jay Kurtz, and I am speaking today on behalf
6 of Devrow. Devrow is a maker of collagen gel for
7 the food industry, solely used in the skin,
8 excuse me, as the skin in the making of sausages.

9 For background, over about the past 15
10 years approximately 50 percent of the fully
11 cooked sausage category in the United States
12 transitioned from using traditional intestine and
13 cellulose casing in favor of collagen gels that
14 are run through a full extruding sausage system.

15 The food safety of these sausages,
16 excuse me, of the sausages that are made using
17 collagen gel as the casing, or as the skin, is
18 frankly unparalleled. And the quality of the
19 product is of the highest standard.

20 As the market has and continues to
21 evolve, the ability to meet consumer demands for
22 skin-on organic sausages is certainly limited to

1 intestine casings which is becoming a significant
2 barrier.

3 Taking into consideration the
4 precedent set of including process intestines on
5 the National List 606, one of the key basis
6 points was that there was an inability to amass
7 enough organic runners or an identity preserved
8 run.

9 The same holds true in that regard for
10 collagen gel in that there's a lack of specific
11 type and cuts of animal skins that are necessary
12 to make these collagen gels.

13 Also, recognizing that gelatin is
14 included on National List 606, and understanding
15 that gelatin is derived from numerous collagen
16 sources of an animal, as an example skin, bones,
17 tendons, et cetera, gelatin is a further
18 processed and de-natured, compared to collagen
19 and compared to the animal skins used in collagen
20 gel production.

21 Based upon highlighting these two
22 preceding examples, which are also detailed in

1 the submitted petition, Devrow does believe that
2 strong consideration should be given to collagen
3 gel during the 2019 spring meeting to be included
4 on National List 606.

5 That concludes my commentary today.
6 I thank you for the time and consideration and
7 look forward to any questions.

8 MR. CHAPMAN: Thank you, Jay. Any
9 questions for Jay?

10 (No audible response.)

11 MR. CHAPMAN: Jay, I am not hearing
12 any questions.

13 MS. DE LIMA: This is Lisa. I have a
14 question.

15 MR. CHAPMAN: Oh, Lisa, go ahead.

16 MS. DE LIMA: Hi. So when you were
17 talking about there being significant barriers,
18 is that specifically you're talking about having
19 single animal casings? There's not --- or is
20 there actually a ---

21 MR. KURTZ: Well, it's twofold.

22 MS. DE LIMA: -- an issue?

1 MR. KURTZ: Yes. It's twofold. It
2 could be specific to single species sausage and
3 single species casings or, more so, based upon
4 traditional or different types of equipment used
5 to make the sausage.

6 So a collagen gel is different than a
7 typical casing that would be stuffed with
8 whatever type of meat is better to make the
9 sausage. A collagen gel requires a specific type
10 of equipment in order to make a co-extruded
11 sausage, meaning the meat and the collagen gel
12 are extruded or plugged at the same time, never
13 requiring any hands to be touching that product.
14 So it is twofold. It doesn't relate back to --
15 but it also relates back to the equipment used to
16 make a sausage.

17 MS. DE LIMA: As a follow-up to that,
18 so it doesn't relate back to -- you're not saying
19 that there's an issue of quantity to use the
20 casings that are currently on the National List?
21 It's a preference for equipment and for the
22 single species.

1 MR. KURTZ: I would say that is a fair
2 answer, yes, indeed.

3 MS. DE LIMA: Okay, thank you.

4 MR. KURTZ: You're welcome.

5 MR. CHAPMAN: Okay, any other
6 questions for Jay?

7 (No audible response.)

8 MR. CHAPMAN: Hearing none, Jay, thank
9 you for your comments here today.

10 Up next, well, do we have Matthew on
11 now? Matthew, we haven't been able to identify
12 your phone number. Are you on the line with us?

13 (No audible response.)

14 MR. CHAPMAN: Matthew, going once,
15 going twice, all right. Next on my list was
16 Patty. Patty, you're here, is that correct?

17 MS. LUMA: Yes.

18 MR. CHAPMAN: All right, we can hear
19 you. Patty, hold on one second though. So James
20 Paskind is up after that. James, we see you on
21 the web portion, we don't have your phone number
22 identified. So if you know your phone number, if

1 you could message that in to us, you could be
2 ready to go next.

3 And then Evan Perkins is after James.
4 Evan, we haven't identified you. If you're on
5 the line, please message in. And then after
6 Evan, just so people are aware, is Deborah
7 Attwood. So Deborah, you might be coming up
8 quickly.

9 Patty, if you could start with your
10 name and affiliation for the record.

11 MS. LOVERA: Sure. Hi, my name is
12 Patty Lovera. I'm with Food and Water Watch, and
13 we appreciate the opportunity to comment. We're
14 also a member of the National Organic Coalition.

15 So I just wanted to talk quickly about
16 a couple of things. I know you heard we've
17 received a bunch of things, a big group letter
18 which we have signed onto. We submitted a
19 petition from our membership, as well talking
20 about the need to add energy infrastructure and
21 impacts on organic to your agenda.

22 And I think you heard quite a bit

1 about this on Tuesday which, you know, we're
2 working in support of developments that you heard
3 on Tuesday. We think this is an important issue
4 that really needs some discussion with the lens
5 of organic for a couple of reasons.

6 One is just to really show the extent
7 of the impact. It's obviously growing sites and
8 what happens if agricultural land and organic
9 agricultural land is the site of some kind of
10 natural gas or oil drilling.

11 But there's also other pieces of this
12 industry that ends up impacting food producing
13 land as well from the wastewater disposal, their
14 fracking and mining in certain parts of the
15 country to the source of water they needed for
16 fracking and then the pipelines to get that gas
17 to some kind of market. So there's a lot of
18 areas with -- conflict with the places that we
19 produce our food.

20 I put a lead in our written comments
21 that are submitted just of one news story that
22 came out very recently in West Virginia. There

1 was an organic grower in the news that a
2 helicopter came over his land.

3 They were supposed to be dropping, you
4 know, soil stabilization materials on a pipeline
5 site not too far away. They hit his farm
6 instead, and there was a lot of confusion about
7 what that meant for his certification because all
8 of this unapproved material was suddenly all over
9 his farm.

10 And I'm sure we're going to be hearing
11 more and more of that. But the idea of putting
12 it on the work plan for NOSB is to raise the
13 awareness of this in the organic community, that
14 people need to be proactive and have some
15 guidance, including these impact mitigation plans
16 that OFA and others are putting out there to get
17 certifiers aware of that and spreading the word
18 so that folks can protect themselves the best
19 they can with this process, and also to raise the
20 awareness of this process impact, the places
21 where we raise our food, including organic food.

22 So that's probably enough on that. I

1 think you've heard quite a bit about it and
2 we're, you know, fully in support of having that
3 conversation start.

4 And then quickly, there have been a
5 couple of other issues of enforcement, and
6 oversight, and accreditation. I think you also
7 heard about this from NOP. We support, you know,
8 really focusing on improving the acreage data
9 collection. We think this is an important part
10 of how we understand the organic industry.

11 But we think it's also an important
12 part of kind of kind of verifying surges or
13 changes we might see that are an important part
14 of making sure NOP --- you don't have the
15 opportunity for fraud.

16 And then in the document that you all
17 have about the accreditation oversight, we have
18 some other things we put in our written comment
19 in addition to what you all have in your
20 discussion paper, including having NOP be able to
21 investigate surges and enforce and, when
22 equivalent, country partners take some action,

1 that we look at taking the same action.

2 And the last piece I'll say is that we
3 think the standards themselves are an important
4 part of having --- I don't know if you'd be able
5 to have that oversight, so things like the
6 livestock practices and things we would really
7 urge, you know, people take another look at. So
8 thank you.

9 MR. CHAPMAN: Thank you, Patty. Any
10 questions for Patty?

11 (No audible response.)

12 MR. CHAPMAN: All right, Patty, not
13 hearing any questions. Thank you for your
14 comments here today.

15 MS. LOVERA: Thanks.

16 MR. CHAPMAN: Up next we have James.
17 James, are you with us?

18 MR. PASKIND: I am.

19 MR. CHAPMAN: All right, James. So
20 after James is Evan Perkins. Evan, we still
21 haven't identified you so please, again, message
22 us in if you're on the line. After James is

1 Deborah Attwood, and then David Ehreth. I've
2 just butchered that.

3 James, if you'd start with your name
4 and affiliation for the record.

5 MR. PASKIND: Certainly. My name is
6 James Paskind. I'm a senior manager of Salm
7 Partners, LLC. First of all, I appreciate the
8 opportunity to provide input on the Devrow
9 petition to include collagen gel in 7 CFR
10 205.606.

11 Salm Partners is a contract
12 manufacturer. We make high quality, food safe,
13 sausage products. Our product portfolio includes
14 many "better for you" products including many all
15 natural sausages. All of our sausage products
16 are made with collagen gel as the product casing.

17 We are here speaking today in support
18 of the Devrow petition to add collagen gel to the
19 National List, and we believe their proposal to
20 be fact-based and rational. We're also hopeful
21 that the technical review, as we understand, is
22 underway and will support the petition details.

1 But my primary purpose today is to
2 describe the marketplace demand for organic
3 sausages in a collagen casing. So first I'll
4 address the growing preference for collagen
5 casing sausages overall, and second, specifically
6 address the unmet demand for organic sausages.

7 The fully cooked sausage category has
8 transitioned from sausage stuffed in processed
9 pig intestine as the casing to collagen casing
10 sausages made from collagen gel. Collagen
11 casings now represent nearly half of the fully
12 cooked sausage category, and there's consumer
13 research that indicates an overall preference for
14 collagen casing sausage products.

15 Regarding organic sausages
16 specifically, all the recipe ingredients, the
17 meats, the seasonings, the condiments, are
18 available as organic ingredients. The options
19 for the sausage casing, which is less than one
20 quarter of one percent of the formula, however,
21 are much more limited in fully cooked sausages.

22 Currently, the only casing option for

1 inorganic sausage is processed intestines which
2 is included on the National List. So a lot of
3 the sausage category, as driven by consumer
4 preference, has evolved for collagen casings made
5 from collagen gel. There's no opportunity for an
6 organic sausage made with collagen gel.

7 A specific example worth discussing
8 briefly, of this unmet need, is chicken sausage.
9 Chicken sausage is a high-growth segment of the
10 fully cooked sausage category. Many of these
11 products are blends of low-fat chicken and
12 various vegetables and condiments. Many are also
13 all natural products, and all of them can be
14 considered "better for you" products.

15 The only opportunity for organic
16 offerings in this segment requires processed pig
17 intestine casings. So this is an obvious show
18 stopper for consumers that desire a high quality
19 chicken sausage but will never purchase a product
20 that includes a pork component. So a product
21 named chicken sausage made with pork casings
22 obviously is a significant limit in terms of

1 options for these consumers.

2 Collagen gel solves the issue. It
3 provides consumers interested in an organic
4 chicken sausage a fully acceptable offering
5 satisfying an unmet demand. This same rationale
6 would, of course, apply to sausages made with
7 other non-pork species such as an all-beef
8 sausage.

9 That concludes my comments, and I
10 appreciate the opportunity to address the Board
11 on this petition. Thanks very much.

12 MR. CHAPMAN: Thanks, James. Any
13 questions for James?

14 MR. BRADMAN: I just have some
15 questions. When you say, excuse me, there's more
16 opportunity for single species products with
17 collagen gel, so perhaps also what you're getting
18 it is that there's more opportunity for Kosher
19 products, say with the chicken sausage. Could
20 you comment on that?

21 MR. PASKIND: I believe there is. And
22 right now Kosher products, for the most part, in

1 this category are cellulose casing. So the
2 casing is stripped, and there is no casing
3 involved.

4 But certainly if there's the
5 opportunity to procure -- and we understand there
6 is -- Kosher collagen from Kosher livestock, then
7 yes, the opportunity for Kosher would be expanded
8 beyond the current.

9 Because the same barrier exists with
10 a processed pig intestine, as we've talked about.
11 Obviously, for more than one reason, that's not
12 the only proposal. But yes, that would be an
13 additional aspect of the market that would be
14 made available.

15 MR. BRADMAN: Thank you.

16 MR. PASKIND: Certainly.

17 MR. CHAPMAN: Any other questions?

18 (No audible response.)

19 MR. CHAPMAN: Hearing none, James,
20 thank you for your comments here today.

21 MR. PASKIND: Thank you.

22 MR. CHAPMAN: All right, up next we

1 have Evan Perkins. Evan, we haven't been able to
2 identify you. Are you on the line with us, Evan?

3 (No audible response.)

4 MR. CHAPMAN: Evan going once, going
5 twice, all right, Evan. We will pass. Up next
6 we have Deborah Attwood. Deborah, are you here
7 with us?

8 (No audible response.)

9 MR. CHAPMAN: Deborah, you might be
10 mute on your side. I see you online, but I don't
11 hear you.

12 MS. ARSENAULT: I don't show her line
13 as muted. So, I'll try to ---

14 MS. ATTWOOD: Can you hear me now?

15 MR. CHAPMAN: Yes. Yes, we can,
16 Deborah.

17 MS. ATTWOOD: Okay, sorry about that.

18 MR. CHAPMAN: Yeah, no problem. Hold
19 on one second. So after Deborah, on deck is
20 David Ehreth, and then Jim Adaskaveg. I'm sorry,
21 Jim, I just butchered that.

22 But, Deborah, if you start with your

1 name and affiliation.

2 MS. ATTWOOD: Sure, thanks. Good
3 afternoon, my name is Deborah Attwood. I'm an
4 attorney with Steptoe and Johnson here in
5 Washington, D.C. And I'm commenting on behalf of
6 PURE Bioscience who is a petitioner seeking the
7 addition of silver that hydrogens situate to the
8 National list.

9 Thank you for the opportunity to
10 provide additional support for why the use of
11 sulfur dihydrogen citrate, or SDC, in organic
12 food processing and handling presents a
13 reasonable certainty of no harm to the safety of
14 human health or the environment.

15 SDC has been the subject of robust
16 reviews by two federal agencies, the Food and
17 Drug Administration, and the Environmental
18 Protection Agency. FDA reviewed the safety of
19 SDC through its Food Contact Notification Program
20 which is an internationally renowned program that
21 establishes the safety of substances for contact
22 with food.

1 EPA has reviewed the safety of SDC as
2 part of the pesticide registration process under
3 FIFRA, the Federal Insecticide, Fungicide and
4 Rodenticide Act. Both agencies evaluated the
5 impact of SDC on human health and on the
6 environment. And both agencies concluded that
7 SDC is safe for its intended use.

8 As part of this review process, the
9 information that PURE Bioscience provided to FDA
10 and EPA was comprehensive. It included detailed
11 descriptions of the chemical identity of SDC and
12 its composition, including any potential
13 impurities or by products that could result from
14 its use.

15 PURE Bioscience described how SDC is
16 manufactured, and how it's intended to be used,
17 and provided data to show that SDC killed food
18 borne pathogenic organisms.

19 Based on all of this information, both
20 agencies evaluated how much SDC humans could
21 potentially be exposed to under a worst case
22 scenario and how much SDC could potentially get

1 into the environment, again using worse case
2 assumptions.

3 Both agencies would have considered
4 the potential impact that a nanoscale substance
5 could have on safety, but this was unnecessary,
6 typically because SDC is not nanotechnology.

7 To support the safety of these
8 reviews, PURE Bioscience provided specific
9 toxicological studies that demonstrated a wide
10 safety margin between the worst case exposures as
11 compared to potential levels of concern.

12 Neither agency would have permitted
13 SDC to be placed on the market unless they were
14 convinced of the safety of the product for its
15 intended use.

16 In addition to these federal reviews,
17 FDC is also a registered pesticide in California,
18 a state that's recognized for its own stringent
19 safety review for antimicrobials.

20 Based on these existing comprehensive
21 and conservative reviews by these agencies that
22 have the relevant expertise to evaluate the human

1 and environmental safety of SDC, we respectfully
2 submit that SDC would be a beneficial addition to
3 the National List for use in organic food
4 processing and handling. Thank you.

5 MR. CHAPMAN: Thank you. I will start
6 with some questions, and then open it up to the
7 floor for some questions.

8 So we've heard some public comment or
9 received some public comment stating that SDC
10 will break down into nano particles when in use.
11 Do you have any further information to provide
12 about comments received related to SDC and
13 nanotechnology?

14 MS. ATTWOOD: Sure. So PURE
15 Bioscience, we did submit some additional --- we
16 recognized the comments that were submitted to
17 the docket on nanotechnology and did also provide
18 our own additional comments responding to those.

19 From a technical aspect, the
20 representative from PURE Bioscience who will be
21 attending the meeting will be better positioned
22 to explain this for you. But the short answer is

1 no.

2 SDC, in and of itself, it's not
3 nanotechnology when it's made. It's an ionic
4 substance. And then when it's used, it's not
5 going to break down into anything further that
6 what it already is. So while we understand the
7 thought process that might lead to those
8 concerns, from a scientific perspective they are
9 just misplaced.

10 MR. CHAPMAN: We received other
11 comments about growing bacterial resistance to
12 silver compounds and, you know, some scientific
13 research that spoke to you, the need to
14 essentially limit the use of silver in medical
15 situations. Do you have any comments related to
16 that?

17 MS. ATTWOOD: So again, the product as
18 it's used uses an incredibly low level of silver.
19 And that's one of the benefits of SDC, is that
20 it's a very narrowly tailored and an extremely
21 low level of silver that's used in order to
22 achieve the antimicrobial effect.

1 Because overall, we consider that the
2 benefits from using SDC and the potential for
3 reduction in food borne illness would instead
4 reduce the potential for antimicrobial resistance
5 and have less food borne illness potential and,
6 you know, most people come to doctors and get
7 antibiotics and that type of medication.

8 MS. OAKLEY: I also understand that
9 another caller today will be commenting on that
10 particular question as well.

11 MR. CHAPMAN: Okay, thank you. Any
12 other questions from Board members?

13 (No audible response.)

14 MR. CHAPMAN: I am not hearing any.
15 So thank you for your comments here today --

16 MS. ATTWOOD: Thank you.

17 MR. CHAPMAN: -- Deborah, and we'll be
18 moving down the list. So next up is David
19 Ehreth, and then following that will be Jim
20 Adaskaveg. And after Jim will be Katherine
21 DiMatteo. David, are you here online with us?

22 (No audible response.)

1 MR. CHAPMAN: No, you're muted, David,
2 on our end. Hold on. All right, you're unmuted.
3 David, are you --- well, we've tried to unmute
4 you at the same time. David, are you there?

5 (No audible response.)

6 MR. CHAPMAN: David? Are you getting
7 it on your end? We're not hearing you.

8 (No audible response.)

9 MR. CHAPMAN: David? I'm not hearing
10 you. So, Jim, are you on the line with us?

11 MR. ADASKAVEG: Jim Adaskaveg here.

12 MR. CHAPMAN: Yeah. All right, Jim,
13 we got you. So David, if you can message in, for
14 some reason we're not getting any audio from you.
15 So we'll come back if we can figure it out.

16 Jim, if you can start with your name
17 and affiliation and proceed with your comments.

18 MR. ADASKAVEG: Yes, I can. I'm Jim
19 Adaskaveg. I'm a professor in the Department of
20 Plant Pathology and Microbiology at the
21 University of California, Riverside. I
22 specialize in mycology, bacteriology, and

1 epidemiology of plant diseases. I'm an
2 independent, although it's listed differently,
3 I'm an independent advocate for the fungicide
4 natamycin.

5 Although the fungicide has been ---
6 this fungicide natamycin has been used in the
7 food industry ---

8 MR. EHRETH: Oh, crap.

9 MR. ADASKAVEG: Hello?

10 MR. CHAPMAN: Okay --

11 (Simultaneous speaking.)

12 MR. CHAPMAN: -- but you're not the
13 speaker.

14 MR. EHRETH: David Ehreth.

15 MR. CHAPMAN: Okay, David. We'll come
16 back to you. We hear you now. But ---

17 MR. EHRETH: Okay, thank you.

18 MR. CHAPMAN: So, Jim, sorry about
19 that, we'll give you some time back.

20 MR. ADASKAVEG: All right. So I'm an
21 independent advocate of the fungicide natamycin.
22 And I'm not affiliated with --- it's kind of

1 listed here that I'm affiliated with DSM or PACE.
2 But I'm actually a professor at the University of
3 California.

4 I've been working with this fungicide,
5 and I'm pretty excited about it. Although it's
6 been around in the food industry for
7 approximately 50 years as a preservative of meats
8 and dairy, with generally regarded as safe, GRAS,
9 standing with the FDA, natamycin's actually a
10 brand new fungicide for agricultural use with
11 this registration in the last two years with the
12 EPA.

13 So EPA registered this fungicide as a
14 biopesticide with exempt status of residue on
15 agricultural commodities. The fungicide's a
16 natural biofermentation product of Streptomyces
17 nanolenses and other Streptomyces species. And
18 this is the critical part. It has no
19 bactericidal activity. It's not killing
20 bacteria. It's only killing certain fungi that
21 we've evaluated in.

22 So for agricultural use, my interest

1 is in the development of new post-harvest
2 fungicides. And I've evaluated hundreds of
3 products from synthetic to biological controls
4 over my career.

5 I've worked with natamycin since 2012,
6 evaluating its efficacy against plant pathogens
7 of food commodities including citrus, stone
8 fruit, tofu. And I found it to be a very
9 effective fungicide.

10 I propose it as a new FRAC group, and
11 I'm a FRAC member. And FRAC now lists it as a
12 fungicide. We just went to the Action Committee
13 where they list all the different fungicides used
14 in agriculture. And this natamycin chemical
15 obtained FRAC Group 48 with a unique mode of
16 action.

17 It's a broad spectrum fungicide, and
18 we have shown that it works on many plant
19 pathogens. But it's still not effective against
20 all plant pathogens, and it's certainly not
21 effective on all fungi. So it has a niche for
22 some of these plant pathogenic or in food

1 contaminating fungi.

2 So natamycin, to me, is a very
3 exciting chemistry. There has not been any
4 reported resistance in filamentous fungi despite
5 its widespread use in the food industry.

6 In my research, I've shown that
7 resistance to natamycin could not be detected in
8 several penicillin species which are notorious
9 post-harvest pathogens. And we were not able to
10 find any such level of resistance.

11 And so this is a remarkable, major
12 advancement that we can use this thing. Because
13 it's registered now as a conventional fungicide,
14 as a post-harvest treatment. And we could use it
15 alone or in mixtures to help prevent other
16 fungicides for developing resistance. So it has
17 multi potential uses.

18 Natamycin can, if it's registered as
19 an organic fungicide, since it is a natural
20 product, this would be an extraordinary
21 advancement for organic farming. Having an
22 effective organic post-harvest fungicide would

1 help in protecting crops during shipment, in
2 marketing, during that transportation period, and
3 could help expand the organic industry
4 tremendously in providing food.

5 MR. CHAPMAN: All right, Jim. We'll
6 have to wrap up your comments --

7 MR. ADASKAVEG: Okay. So my last
8 statement is that I propose that natamycin will
9 be great for organic farming. It follows a
10 similar trend as polyoxin D that was recently
11 considered by your group as a natural
12 fermentation product. And therefore, I am
13 supporting natamycin with a similar strategy as a
14 pesticide, or potentially organic, for the
15 industries of the United States.

16 MR. CHAPMAN: Thank you. Thank you,
17 Jim. Any questions for Jim?

18 MS. BEHAR: Yeah, this is Harriet.

19 MR. CHAPMAN: Go ahead, Harriet.

20 MS. BEHAR: Would natamycin be placed
21 in any way for consumers to know that it had been
22 used upon the fruit that they would be eating?

1 MR. ADASKAVEG: Most packers label
2 their boxes of what treatments are being used on
3 that food. And that's, I think, required. So,
4 like, on the fruit boxes, currently they say
5 treated with, and they'll list the fungicides
6 that they treat the commodity with.

7 So that, I imagine, could be on that
8 label as it is used. And it could be also
9 indicating that it's organic pool, that it's an
10 organic material on the box that way.

11 MS. BEHAR: Yeah, I wasn't sure that
12 there was a requirement that it --- but if it's
13 on the box, it would not be out on the retail
14 floor, for instance, the plums, or peaches, or
15 whatever where people are preferring one at a
16 time. There wouldn't be a sign or anything.

17 So it's somewhat different with being
18 used in bread products or cheese products where
19 the consumer would actually see it on a retail --

20 -

21 MR. ADASKAVEG: Well, in some markets
22 around the world, there are signs put out, like,

1 in Japan. They do put signs out, even at the
2 marketing location. But that's not the case for
3 other pesticides that are organically used, like
4 copper or sulfur. I mean, there's no signs being
5 posted for those types of materials either. In
6 the US, there's no requirement for that, for
7 example. But there are places around the world
8 that they do to that. Yes, they do put those
9 signs up.

10 MS. BEHAR: That was our exact use in
11 post-harvest handling.

12 MR. ADASKAVEG: Right. That's exactly
13 right. They did a required --- what they call a
14 food additive college in Japan with what we have
15 here.

16 MS. BEHAR: And then, so one of our
17 concerns was that it is used for human health.
18 It's a health product. And it's also used
19 actually on livestock as well.

20 And there has been some resistance, I
21 believe, by candida, you know, developed to the
22 natamycin over time. So there is some concern

1 about using a health product that is very useful
2 for maintaining human health and concern that
3 resistance will get built over time if it was
4 used, you know, regularly on fruit.

5 MR. ADASKAVEG: Well, I work ---
6 obviously we're trying to develop safer products
7 for post-harvest use. And from what I understand
8 talking to the registrar, and talking to people
9 who know about these things, the livestock usage
10 in the United States is basically none. And the
11 company that registered it originally is no
12 longer in existence. So the amount of sales is
13 actually not justifying what you're saying there
14 with its losing livestock.

15 And as far as medical use, you know,
16 this is mainly for eye infections. And most of
17 these things are happening in more or less third
18 world countries. And, you know, I don't think
19 there's any extensive use of this material, or
20 hardly any at all in, you know, first world
21 countries like the EU, or the United States, or
22 Japan, and these types of places.

1 But obviously there are some
2 additional uses on the books in case that some
3 issues ever develop. But again, the amount of
4 usage of this in that capacity is near zero, from
5 what I understand.

6 MS. BEHAR: Thank you.

7 MR. ADASKAVEG: And as far as the
8 resistance goes, there's no resistance to
9 filamentous fungi. And candida's a yeast which
10 is a unicellular fungus. And, you know, most of
11 those reports are coming out of laboratories
12 where they do mutagenesis and generate resistance
13 for studying these types of things.

14 So I haven't, you know, I've been very
15 much involved with this, and I haven't really
16 documented any filamentous fungus which is where
17 all or most of the post-harvest pathogens of food
18 crops, which is my specialty, are found. So I
19 hope that answers your question.

20 MS. BEHAR: Yes, thank you.

21 MR. CHAPMAN: Any other questions,
22 Jim? Okay. Hearing none, Jim, thank you for

1 your testimony here today.

2 MR. ADASKAVEG: Okay. Thank you very
3 much for having me. I appreciate it.

4 MR. CHAPMAN: Yes. Yes. So, we'll
5 head back to David. David, are you online with
6 us? David? David, are you there? David, again,
7 I don't know if you could hear me before. But we
8 are not hearing you now. I'll give you another
9 moment to try to unmute.

10 All right, David, still not hearing
11 you. So, we'll proceed on. And if we can figure
12 out technical difficulties we'll come back to
13 you. It might be best, if you're able to, to try
14 to dial in the line, and then message us the
15 number you're dialing in from.

16 Well, up next then will be Katherine
17 DiMatteo. Actually, I think we have you on mute.
18 Yes, hold on. Katherine, are you there with us?

19 MS. DIMATTEO: I am. Can you hear me?

20 MR. CHAPMAN: Yes, we can. So, hold
21 on, Katherine. After Katherine will be Mark
22 Farinha, and then Sanford Bigelow. Of course,

1 we'll go back to David if and when we can figure
2 out the technological fix. Katherine, if you
3 could start with your name and affiliation for
4 the record?

5 MS. DIMATTEO: All right. Thank you.
6 My name is Katherine DiMatteo. I'm a senior
7 partner and associate at Wolf DiMatteo and
8 Associates. And we are here today to support the
9 re-listing of sodium carbonate peroxyhydrate, or
10 SCP, which is a safe, environmentally friendly
11 material, and is an alternative to copper
12 sulphate.

13 While SCP is often used as a
14 disinfectant and sanitizer for water systems,
15 there seems to be quite a lot of debate
16 surrounding its use as an algicide in rice
17 production, which is what I would like to address
18 today.

19 During the last Sunset Review copper
20 sulphate, on copper sulphate, one report from
21 2007, which was released before SCP was even
22 allowed for use in rice, has been referenced by

1 the Crops Subcommittee, and is still being
2 referenced today.

3 The new report by the California Rice
4 Research Board summarized that "To date we have
5 not found an algicide that gives results like
6 growers would anticipate."

7 This is just one data point by one
8 organization. There are many more current
9 references that show SCP is an effective
10 algicide. Some of those specifically have been
11 done for rice. And many on algaecides in general.

12 However, change in these other
13 references and reports have not been read by the
14 Subcommittee or the NOSB.

15 Also, in the discussion document for
16 this meeting it assumes that SCP is not widely
17 used, and cite 2010 data on California acreage in
18 which copper sulphate was used, versus SCP.

19 At the time copper sulphate was used
20 97,757 times, versus SCP use of 1,277 times. I'd
21 like to note again that this is when SCP first
22 became available to California rice growers.

1 Remember, 2010. So, of course the uses rate
2 would be very low.

3 Subsequently, SCP has been gaining
4 traction. Its peak usage thus far in 2014 of
5 16,091 acres for California rice -- reported a
6 low vetted national list. But not decisions made
7 that take away materials that can provide a
8 needed tool for organic farmers.

9 Removing a material from the list
10 based on the number of farmers who currently are
11 using the tool is not a fair and equitable way to
12 decide about who may need an alternative to what
13 is on the list, or who may use it in the future.

14 One material cannot be appropriate for
15 all situations. Farmers need to be able to use a
16 material that fits their needs when they need it.
17 Thank you very much for the opportunity to
18 comment.

19 MR. CHAPMAN: Thank you. Any
20 questions for Katherine?

21 MS. OAKLEY: This is Emily. Can you
22 hear me okay?

1 MR. CHAPMAN: Go ahead. I'll --

2 MS. OAKLEY: All right. I'll try to
3 talk louder again. Sorry. Thank you, Kathy, for
4 your comments. I was wondering if this recording
5 that you just provided is for all rice in
6 California? And if you are able to break that
7 down by organic usage?

8 MS. DIMATTEO: Unfortunately we can't
9 break it down by organic usage yet. That's not
10 the way the information is collected.

11 MR. CHAPMAN: All right.

12 MS. OAKLEY: I just want to say, I
13 guess maybe put it out as part of the reason that
14 we noted that it wasn't highly used is we didn't
15 see a tremendous number of public comments that
16 it was used very widely. And it wasn't
17 originally included as an algicide.

18 I did do a little bit of searching on
19 the pesticide use reports database to try to
20 determine usage among organic growers. And it
21 was a little difficult to break that down by
22 organic. But it seemed that there were some

1 uses, but very limited.

2 And there's one -- if in fact that is
3 in irrigation hoses. Like it's, you know,
4 understandable it's under that listing. But part
5 of our concern was that it was originally
6 intended for use as a -- as you noted, for copper
7 in rice.

8 So, that can be part of that basic
9 discussion that we're trying to elucidate through
10 the public comments, and get more feedback on who
11 is using it and how. So, thank you for your
12 feedback.

13 MS. DIMATTEO: Right. And I'd just
14 like to send out a couple of things. And, yes,
15 according to select data, most data collected
16 isn't broken out unless it's specific, say the
17 research of the report is done that way.

18 Secondly, I would imagine that it's
19 very difficult. Most farmer probably who may use
20 SCP may not even know they're using SCP, because
21 they recognize by brand name, a brand name
22 product that they're using in which it is

1 contained.

2 So, you know, if you want to collect
3 data from farmers you may have to do it in a
4 different way. Or discover the brand names that
5 use SCP, or have a SCP formulation, and ask the
6 question that way.

7 We've found in listening to and
8 reading many comments over time that especially
9 on materials the farm community hasn't commented
10 as much as those of us who have either the time,
11 or have been paid, or are an NGO, to be able to,
12 you know, gather the data, or to make a point.

13 So I, we've always found it very
14 troubling that a decision about the use of a
15 material that may very much be a better
16 alternative than, in this case copper sulphate,
17 is judged on the number of comments that one
18 receives about the product. That seems to not be
19 a very reasonable way to make those kinds of
20 judgments.

21 And we, again, our company has always
22 pointed out that this is a toolbox of tools.

1 Nobody's required to use them either all the
2 time, or even some of the time.

3 They're, the tools are there for
4 farmers to choose to use when they really need
5 them. And they need a set of alternatives.
6 Because one size doesn't fit all. Each farming
7 situation is different.

8 So, just a caution from us that we
9 have repeated many times. And I'm sure people on
10 the NOSB who are listening in have heard us say
11 this. But be careful about removing safe,
12 environmentally friendly products that may be the
13 best alternative for some farmers in their
14 production systems.

15 MR. CHAPMAN: Any other questions for
16 Katherine? Hearing none, thank you, Katherine
17 for your comments. I believe that --

18 MS. DIMATTEO: You're very welcome.

19 MR. CHAPMAN: Thank you. I believe we
20 have David on the line now. David, are you here
21 with us?

22 MR. EHRETH: Yes. Can you hear me?

1 MR. CHAPMAN: Yes, we can.

2 MR. EHRETH: Okay. Good.

3 MR. CHAPMAN: Hold on one second,
4 David. So, after David it will be Mark Farinha,
5 and then Sanford Bigelow. David, if you could
6 start with your name and affiliation?

7 MR. EHRETH: Okay. My name is David
8 Ehreth. And I am with Alexander Valley Gourmet.
9 And I would like to speak in support of using
10 natamycin as a post-harvest rinse for organic
11 products.

12 I'm a partner in a small company that
13 has produced natural live culture fermented
14 pickles and sauerkraut for 14 years. And we
15 depend on naturally occurring lactic acid
16 bacteria for vegetable fermentation.

17 Unfortunately, that same environment
18 encourages bacterial, that encourages bacterial
19 fermentation provides an ideal environment for
20 spoilages. Because of this our products are very
21 vulnerable to considerable losses cause by
22 spoilages.

1 In our efforts to protect our food
2 supply from synthetic chemical intrusion,
3 producers of products like ours have long sought
4 some completely natural, non-synthetic
5 antimicrobial that while effective on fungi such
6 as yeast, will have no impact on bacteria.

7 Natamycin appears to be such an
8 antimicrobial. And further, natamycin can be
9 produced with non GMO organic ingredient inputs.

10 The primary source of yeast in our
11 process is the naturally occurring yeast on
12 vegetables. Our fermentation depends on lactic
13 acid bacteria also present on these vegetables.
14 And therefore, we can't use broad spectrum
15 antimicrobial washes like chlorine.

16 Our experiments using natamycin as a
17 post-harvest wash have resulted in as much as a
18 30 percent yield improvement. The water
19 solubility of native natamycin is very low.

20 Vegetables washed with natamycin rinse
21 have very small uptake. With a secondary water
22 rinse, quantities of natamycin in the finished

1 products fall below detectable thresholds.

2 Repeated studies have found that
3 natamycin is safe to use as both a surface
4 treatment, and as an ingredient.

5 The World Health Organization, and
6 many others, have studied the food safety aspects
7 in natamycin, and concluded that it's safe for
8 human consumption within defined limits.

9 Studies by DeVore, et al, have shown
10 that there is no observable increase in
11 generational resistance to natamycin used in
12 factories.

13 In a paper by Dalhoff and Levy,
14 concern has been expressed about the possibility
15 of increased microbial resistance as a result of
16 certain natamycin formulation with other
17 chemicals.

18 However, their expressed concern
19 relates to the formulations of natamycin that
20 increase acid resistance and solubility. Our
21 discussion here, or at least my discussion is
22 focused on natamycin, not on compounds of

1 natamycin combined with other chemicals.

2 Because natamycin is completely
3 natural and can be produced with organic
4 ingredients it has been shown to be safe for
5 human consumption, and has not negative
6 demonstrated environmental effects, we recommend
7 granting organic certification to properly
8 produced natamycin.

9 And just to put a footnote on this.
10 We believe that natamycin is one of the most
11 remarkable tools that can help promote organic
12 and natural foods that contain live cultures, and
13 have that lead to a very positive health outcome.

14 So, we very strongly support
15 natamycin. And I'll take any questions. Thank
16 you for your time.

17 MR. CHAPMAN: Thank you. Any
18 questions for David?

19 MS. BEHAR: Yes. This is Harriet.
20 Are there other materials that can be used
21 instead of natamycin that are already on the
22 National list, or are natural, and don't need to

1 be on the National List?

2 MR. EHRETH: There are other products
3 that have been put forth. And we have
4 experimented with them. None of them has shown
5 the efficacy that natamycin has.

6 And these other products are not,
7 things like mustard oil, or products that contain
8 mustard oil, or other things, they have an
9 unfortunate organoleptic component that adds, you
10 know, sometimes undesirable flavors, or other
11 things to products that natamycin does not have.

12 So, I would say that natamycin, to the
13 best of my knowledge, is in a class of its own
14 here.

15 MS. BEHAR: I just have a follow-up.
16 How much loss do you think we are having now in
17 fruit due to the lack of the use of natamycin, in
18 post-harvest handling?

19 MR. EHRETH: Well, I can't speak, if
20 you mean, when you say fruit, I can respond to
21 the vegetable. And really, I have to narrow my
22 observations to the fermented, inputs to the

1 fermented food business. Because that's the
2 business I'm in, and very familiar with.

3 I have at times lost an entire batch.
4 And for us an entire batch would be about 12
5 tons, and to spoilages. And I know that there
6 are others, some of my other colleagues in the
7 industry have had to reverse their effort to
8 offer live culture foods, and reverted back to
9 pasteurization, because they were simply unable
10 to bear the losses.

11 And these losses are periodic. They
12 come, they go. They're, it's a sort of a ghost
13 that haunts our industry, and drives up the
14 price, the consumer price of our products.

15 And so, we, I personally believe after
16 studying this problem for years that natamycin is
17 the single most effective tool against this. And
18 because of its completely natural, the creation
19 is non synthetic, and that it can be created with
20 natural input, organic inputs, that this is a
21 powerful tool for the fermented foods industry.

22 MR. CHAPMAN: Other questions for

1 David?

2 MS. OAKLEY: I have a question. This
3 is Emily.

4 MR. CHAPMAN: Hey, Emily. And we can
5 hear you clearly.

6 MS. OAKLEY: Yay. How many certified
7 organic products comprise your overall line?

8 MR. EHRETH: At present we have one
9 product line that is certified organic.

10 MS. OAKLEY: And how many, would that
11 be in total?

12 MR. EHRETH: No, no.

13 MS. OAKLEY: Organic products you have
14 in total?

15 MR. EHRETH: We have ten products.

16 MS. OAKLEY: Okay. So, ten. And one
17 is organic? Thank you.

18 MR. EHRETH: Yes. And if I could just
19 explain very quickly, that these issues dovetail,
20 in that our reluctance to offer a broader line of
21 organics have to do with the economics here, that
22 organics to begin with is more expensive from a

1 material basis.

2 Combined then with spoilages, losses
3 drives the price out of the reach of the average
4 consumer. And we are very focused as a company
5 on being able to offer products that the average
6 consumer can afford.

7 MR. CHAPMAN: Any other questions for
8 David?

9 MR. ELA: This is Steve. I have a
10 question.

11 MR. CHAPMAN: Go ahead.

12 MR. ELA: Just, one of our concerns,
13 and obviously the previous caller we talked a
14 little bit about this, is the potential use of
15 natamycin for human health, and the concerns over
16 antibiotics used in agriculture, and crossing
17 over to potential resistance in human health. Do
18 you have any comments on that?

19 MR. EHRETH: Yes, I do. First of all,
20 my proposal here is, as I mentioned, one of the
21 real miraculous characteristics of natamycin. Is
22 that it can be used as a post-harvest rinse. And

1 then washed from the products to the point where
2 it is non-detectable in a finished product.

3 So, used as a post-harvest rinse I
4 would point to its lack of solubility. And I
5 know there are products on the market that have
6 increased the solubility.

7 And I can't speak to those, because I
8 am not scientifically skilled to address that. I
9 would leave that to others. But I do know that
10 used as a post-harvest rinse it can be extremely
11 effective, and virtually non-present in the
12 finished product.

13 As an ingredient we have also run
14 experiments to see what would happen if we
15 introduced natamycin into ferments that had a
16 major yeast outbreak, and found that it was, I
17 don't know another word to use, it was
18 devastatingly effective.

19 And then, that goes over to the
20 question of safety, you know, human safety. And
21 I know in the paper by Dalhoff and Levy there was
22 concern expressed about two things.

1 One, the increased microbial
2 resistance, just due to the resistance of certain
3 formulations of natamycin in the human gut. And
4 the second was the possibility of horizontal gene
5 transfer.

6 Those two subjects are way beyond my
7 pay grade. And I would hearken back to both the
8 FDA and the World Health Organization, European
9 Food Safety Organization, and others who have
10 studied this, and have generally concluded that
11 natamycin used within defined limits is safe.

12 So, the Dalhoff/Levy paper is an
13 interesting one to read, but does not draw, it's
14 not a scientific study. It is titled a letter,
15 or a word of caution, is just how they phrased
16 it. So, that's kind of where I'm at on that.

17 MR. CHAPMAN: Any other questions?

18 All right.

19 MR. EHRETH: And by the way, the
20 Dalhoff/Levy study, just quickly, the
21 Dalhoff/Levy study doesn't speak to natamycin,
22 per se. It speaks to natamycin combined with

1 other ingredients that cause it to be more water
2 soluble, and more resistant to acid.

3 MR. CHAPMAN: All right. Thank you,
4 David.

5 MR. EHRETH: Okay. All right.

6 MR. CHAPMAN: And hearing no more
7 questions. Sorry for the technological issues in
8 there.

9 MR. EHRETH: No. That was, the
10 problem was on my end I'm sure. Thank you.

11 MR. CHAPMAN: Okay. Yes.

12 MR. EHRETH: Bye, bye.

13 MR. CHAPMAN: Okay. Up next we have
14 Mark Farinha. Mark, are you on the line with us?
15 We might have you --

16 MR. FARINHA: I am here.

17 MR. CHAPMAN: Okay, Mark, we can hear
18 you. Hold on one second. After Mark we have
19 Sanford Bigelow. After Sanford Bigelow we have
20 Dallas McCann.

21 Dallas, we haven't identified your
22 phone number. So, if you're with us, please

1 message in. After Dallas will be Jane DeMarchie.
2 Mark, if you can start with your name and
3 affiliation?

4 MR. FARINHA: Yes. My name is Mark
5 Farinha. I'm a professor of microbiology. I am
6 a food consultant and pharmaceutical consultant.
7 I've been in the business for over 25 years.

8 Today I want to address the NOSB on
9 PURE bioscience, on their behalf for their silver
10 dihydrogen citrate product.

11 Today what I'd like to do is to focus
12 on the matter of silver, and resistance to silver
13 by microorganisms. Research on silver resistance
14 spans about 70 years of formal research.

15 But recently, in the last 20 years or
16 so this has accelerated. And there's quite a lot
17 more research in the last 20 years or so. This
18 coincides with an expansion of the use of silver
19 in wearables, in medical devices, in food
20 packaging, and in food processing.

21 Ionic silver has been attractive as a
22 antimicrobial, because it is very broad in

1 spectrum, affecting not only just bacteria, but
2 also fungi, and a number of viruses.

3 This ability of silver to be effective
4 is really centered on the broad action attacking
5 and compromising many products of the cell,
6 including the cell membrane, critical protein
7 inside the cell, and even on the expression of
8 DNA in microorganisms.

9 Because of its broad spectrum of
10 action resistance to silver appears to be surely
11 difficult for organisms to achieve. The majority
12 of reports on resistance, and I've done some of
13 this work, deals with the expulsion of silver
14 from the cell.

15 And this is done by efflux pumping.
16 Silver ions are pumped out of the cell at the end
17 itself. This mechanism really just limits the
18 amount of silver in the cell. And therefore,
19 minimize the damage from the silver.

20 This is typical for the cell. It
21 crosses the cell, and reduces the fitness of
22 cells. And it makes this sort of resistance

1 fairly transient, according to all observations
2 that have been noted to date.

3 When they're talking about PURE
4 bioscience, and their product, this is of ionic
5 silver that's combined with citrate, and is a
6 fairly stable product. The citrate really makes
7 the product enter the cell better, because it
8 appears strew from microorganisms carrying the
9 silver with it.

10 It drains down to the silver until
11 it's delivered to the target. And what this does
12 is minimize the silver ions available for efflux
13 pumping.

14 And so, I think this particular
15 application allows you to have something
16 squarely, safely delivered, something that's
17 fairly effective, and something you can deliver
18 at a fairly low level.

19 This means that the actual amount of
20 silver used in the process is fairly small. And
21 this correlates with induction of efflux pumping
22 systems in bacteria.

1 So, I think when you look at the
2 overall number of organisms affected by silver,
3 you can see many of the common foodborne
4 pathogens, this seems like a reasonable approach
5 to treatment, especially food treatment,
6 equipment treatment, and pre-treatment of food
7 products.

8 So, what I'm saying is, this broad
9 antimicrobial activity of silver was a unique
10 formulation of silver dihydrogen citrate should
11 provide us with fairly safe food preparation and
12 processing, even in organic facilities, with
13 really an absence of development of resistant
14 microorganisms. And that's my comment. Thank
15 you.

16 MR. CHAPMAN: Thank you, Mark. I'll
17 start with some questions, and then I'll open it
18 up to the Board. Are, if I understood your
19 comment correctly, correct me if I'm wrong,
20 you're saying that the silver with the citrate is
21 the more effective sanitizer than perhaps what
22 we've seen in studies submitted to us about just

1 silver alone.

2 And that the resistance that's in
3 those studies about silver is not applicable to
4 the silver citrate product that we're discussing
5 here.

6 MR. FARINHA: When people talk about
7 silver products they're really talking about two
8 things now, nano particle silver and ionic
9 silver.

10 Nano particle silver causes resistance
11 by excluding, and not taking out the particles
12 themselves. For ionic silver, silver comes into
13 the cell, and that free ionic silver is pumped
14 back out of the cell.

15 What you have with SDC, the silver
16 dihydrogen citrate, is the citrate binds the
17 silver, in turn the cells takes this up because
18 it thinks it's normal food. And the silver being
19 bound to the citrate is able to affect the
20 targets in the cells, and not be easily available
21 for pumping.

22 This means you can use less silver in

1 the treatment. And it's more likely than not to
2 show resistance. Not because the cells aren't
3 capable of turning on efflux pumping. But it
4 doesn't help them very much to do so.

5 MR. CHAPMAN: Okay. Are you also
6 qualified to speak to the some of the nano silver
7 comments that we've received? And I can --

8 MR. FARINHA: Perhaps. Within the
9 knowledge of what I've done with nano silver.

10 MR. CHAPMAN: Okay. So, we received
11 comments from folks that said that the sodium
12 dehydrates, the FDC will, even if it's not a nano
13 silver in its form, it will break down because of
14 the citrate into a nano silver. Is that
15 accurate? Is that accurate as?

16 MR. FARINHA: I don't believe so. And
17 I'll tell you my reasoning why. Nano particle
18 silver is aggregate silver. And this is a
19 problem with unbound ionic silver.

20 Unbound ionic silver is perfectly
21 capable of coalescing, and forming small
22 particles. The citrate action prevents this from

1 happening, and stabilizes the ionic silver.

2 This is a problem I've seen with other
3 ionic silver products, is they will actually
4 particalize and play out in the product, like on
5 surfaces. And that is a problem. But I have not
6 seen this to date with the SCD product. And so,
7 I think it's unlikely to happen.

8 MR. CHAPMAN: Okay. Do we have
9 questions from other Board members?

10 MR. MORTENSEN: I do. This is Dave
11 Mortensen. Yes. So, thank you for the
12 explanation. I am just wondering, if the
13 organisms are, if their defense mechanism is to
14 pump out the silver, what is the fate?

15 Like when we think about pesticide
16 fate in a plant or a microbial organism, we think
17 about the fate in transport. What is the fate of
18 the silver that's excreted?

19 MR. FARINHA: Well, it remains
20 outside, or it can be re-entered into the cell.
21 It's like any other sort of pumping system. The
22 cells pump it out, and then it's back outside.

1 MR. MORTENSEN: So, in this --

2 (Simultaneous speaking.)

3 MR. FARINHA: I'm sorry.

4 MR. MORTENSEN: If you could just walk
5 us through? So, in this case where we're washing
6 something we would, you know, it would have a
7 antimicrobial effect. And then there would be
8 silver ions that are released in the process back
9 into the water? Is that how it would work?

10 MR. FARINHA: Not from this particular
11 product. This product enters the cell where it
12 delivers the silver to bind to internal material
13 inside the cell. And therefore, it cannot be
14 pumped out. So, it would just be a contaminant
15 that is killing the microorganism at that point.

16 MR. MORTENSEN: And it would, that
17 dead microorganism would be washed off the
18 produce?

19 MR. FARINHA: That is correct.

20 MR. MORTENSEN: Yes.

21 MR. FARINHA: But because of the
22 stabilized product you're using so little of it

1 this falls very far below the level that you
2 would normally find in effluent or water. And
3 not to be this guy, it's such a low level of
4 silver.

5 MR. MORTENSEN: Thank you.

6 MR. BRADMAN: I just have a quick
7 follow-up question.

8 MR. CHAPMAN: So, this is Asa. Asa
9 you need to identify yourself to the court
10 reporter, Asa the instructions.

11 MR. BRADMAN: Yes. How are you
12 defining what is a low level?

13 MR. FARINHA: Lower level in terms of
14 EPA levels.

15 MR. BRADMAN: So, for water, for soil,
16 for heating exposure?

17 MR. FARINHA: Naturally occurring
18 levels of silver, according to the EPA. And
19 these are far below those levels. So, you're not
20 adding to the silver burden already present in
21 the natural environment.

22 MR. BRADMAN: Okay.

1 MR. CHAPMAN: Other questions? Not
2 hearing any, Mark, thank you for your testimony
3 here.

4 MR. FARINHA: Thank you very much.
5 Thank you to the Board. Thank you for listening.

6 MR. CHAPMAN: Up next we have Sanford
7 Bigelow. Sanford, are you on the line with us?

8 MR. BIGELOW: Yes, I am. Can you hear
9 me?

10 MR. CHAPMAN: All right. Yes, we can.
11 And hold on one second.

12 MR. BIGELOW: Great.

13 MR. CHAPMAN: After Sanford is Dallas
14 McCann. Dallas, we have not confirmed your phone
15 number. So again, please message in. After
16 Dallas is Jane DeMarchie, and then Jean-Marie
17 Ngore Traore. Sanford, if you can start with
18 your name and affiliation for the record?

19 MR. BIGELOW: Great. I'm Sanford
20 Bigelow. And Vanguard Global Associates, a
21 consulting firm. I have a PhD in Chemistry from
22 the American University in Washington, DC. And

1 I'm a Board Certified toxicologist.

2 I provided written comments to the
3 NOSB, for the NOSB Board. I'm presenting today
4 on behalf of PURE Biosciences, and the use of
5 their SDC product, as referred to by the previous
6 speaker and Deborah Atwood.

7 And I will call this product silver
8 citrate in my presentation. I encourage the
9 Board to approve the use of silver citrate as a
10 synthetic substance in the National List

11 The Board reviewed the peer petition,
12 prepared the technical report. And the Board
13 recommended to limit silver citrate use with
14 particle sizes greater than 300 nanometers, based
15 on their nano technology policy.

16 VGA intends to make five major points
17 regarding the Board recommendation, safe use of
18 silver citrate in fruit.

19 One, the Board recommendation on
20 particle size will not work. Two, silver citrate
21 contains silver ions which are not chemically
22 defined as nano particles.

1 Three, the EPA and FDA have approved
2 food uses for silver citrate. And both agencies
3 recognize that silver citrate is composed of
4 silver ions. The EPA and FDA have both
5 determined that silver citrate is safe for food.
6 This is point number four.

7 Furthermore, no scientific articles
8 had been published in "PubMed" from 1968 to 2018.
9 And no articles reported that silver exposure
10 promoted antibiotic resistance in microbes.

11 Accordingly, if there was any evidence
12 the EPA and FDA would have considered antibiotic
13 resistance in their safety evaluations when they
14 approved the use of silver citrate.

15 The Board should not adopt the
16 particle size recommendation for silver citrate
17 use. Both the Board technical report, and their
18 --- Board's review recognized that silver citrate
19 contains silver ions.

20 We strongly advocate that the Board
21 does not adopt particle size recommendation
22 because, one, it does not accurately describe

1 silver citrate composition in the PURE
2 Bioscience's product.

3 Two, the recommendation will
4 unintentionally result in approving a different
5 silver based disinfectant, for which a Board
6 petition has not been filed.

7 And three, the recommendation will
8 result in disinfectant uses that are outside the
9 compliance with existing EPA, FSIS, and FDA
10 regulations for silver citrate uses in food.

11 Thank you for your time and efforts.
12 Are there any questions?

13 MR. CHAPMAN: So yes. This is Tom.
14 I have some follow-up questions. And then I'll
15 open it up to the Board.

16 So, we used the criteria laid out in
17 the organic food production data in order to
18 evaluate substances for inclusion on the National
19 List. There is human health environmental risk,
20 as well as compatibility with the system of
21 organic production.

22 And previous National Organic

1 Standards Boards have passed guidance stating
2 that nano, from the Board level, not adopted by
3 the National Organic program. But nano
4 technology, and particularly the finding of 300
5 nano particle size is incompatible with organic
6 production systems.

7 So, that annotation was placed on it
8 to make it consistent with previous NOSB policy,
9 as well as potentially compatible within organic
10 production systems.

11 So, you're saying that adding that
12 annotation in there would not, would make this
13 product not, would not be -- I guess I'm
14 confused. Because the petitioner stated that
15 this is not a nano product. And this inclusion
16 of the nano product spectrum you're saying would
17 disallow, would invalidate the use of this
18 product. I guess I have not been reviewing this
19 product then. So, help me --

20 MR. BIGELOW: You know -- Go ahead.

21 MR. CHAPMAN: Can you help clarify
22 this for me?

1 MR. BIGELOW: You're adding a
2 criterion that no longer describes the petition
3 use, or the petition product. The petition
4 product contains silver ions. Silver ions are
5 smaller than nano particles, according to FDA
6 nano technology policy.

7 Nano particles fall within the range
8 of 1/100 nanometers, according to FDA's policy.
9 A silver ion has a ionic radius of .29
10 nanometers, or, you know, a circumference, ionic
11 circumference of less than .6 nanometers, which
12 is less than the range of nano particles
13 recognized by FDA.

14 Because silver is a, just like a
15 calcium ion, a free calcium ion, or a free copper
16 ion, which are already approved on the National
17 List of Disinfectants, they would, it really
18 solubilizes with citrates, as available for
19 disinfectant use, disinfectant action.

20 MR. CHAPMAN: Okay.

21 MR. BIGELOW: Yes. So you're, by
22 placing this criterion you're no longer

1 describing the petitioned product. It's a freely
2 soluble ionic material. And it's smaller than,
3 you know, nano particles.

4 And just like other minerals that are
5 used as disinfectants, they also will form, you
6 know, ions. They may agglutinate as ions into
7 nano particles. Who knows? And then they, you
8 know.

9 But if you want to place this
10 criterion onto SDC, silver citrate, you may want
11 to look at those other salts that are already on
12 the National List.

13 MR. CHAPMAN: Okay.

14 MR. BIGELOW: And the EPA --

15 MR. CHAPMAN: Any questions?

16 MR. BIGELOW: The EPA, when they
17 exempted silver from a pesticide tolerance, they
18 characterized the composition of silver citrate
19 as not metallic silver. It was only silver ions
20 that were generated from electrolytic generation.
21 And those would be ions, not any metallic silver,
22 or nano particles. So, they wanted to exempt the

1 silver, just the silver ion for this particular
2 product.

3 MR. CHAPMAN: Any additional questions
4 from the Board?

5 MR. ELA: This is Steve.

6 MR. CHAPMAN: Go ahead, Steve.

7 MR. ELA: And pardon my ignorance a
8 little bit here. But when the previous speaker
9 was talking about, while, you know, why the
10 citrate was so critical for the action of the
11 silver, so the cells couldn't, in essence pump it
12 back out.

13 But if you're saying the silver is
14 actually as an ion in the cell, I'm a little
15 confused as to why, if it's separate from the
16 citrate at that point as a silver ion, why the
17 cells can't go ahead and pump it out as a silver
18 ion.

19 MR. BIGELOW: Well, as all ions, all
20 salts, there's dissociation between the anion and
21 the cation. So, citrate is a tricarboxylic acid.
22 And it will bind three atoms of silver.

1 The silver citrate is absorbed into
2 the cell. And there's always association and re-
3 association of anions to cations in cellular
4 milieu.

5 The situation becomes is when the
6 silver ion is associated it can, it's available
7 to exert its disinfectant action by binding
8 cellular molecules, and stopping cellular
9 metabolism. And that's essentially what EPA and
10 FDA recognize, the action of silver citrate.

11 MR. ELA: So, once that silver is
12 disassociated in the cell, what prevents it from,
13 in that disassociated state, from recombining?
14 And my chemistry is rusty here, to say the least.
15 But combining back into, like one of our public
16 commenters, written comments said, back into
17 what, into something like a nano particle?

18 MR. BIGELOW: I don't, I think that
19 the level of silver citrate used, and the sheer
20 massive quantity of cellular material in the
21 microbe, just by mass action alone you're not
22 going to have a lot of silver citrates, silver,

1 excuse me, silver ions re-associating with other
2 silver ions.

3 Plus, when one silver ion
4 disassociates from citrate it, there may be a
5 situation where the other silver ions will remain
6 associated with the citrate.

7 But the, clearly, based on
8 antimicrobial testing, the silver ion is active
9 in stopping or reducing the viability of these
10 microbial organisms.

11 MR. ELA: Thank you.

12 MR. MORTENSEN: I have a question. I
13 asked this question --

14 MR. CHAPMAN: Hold on. Hold on. Say,
15 just for the court reporter --

16 MR. MORTENSEN: Yes.

17 MR. CHAPMAN: Dave Mortensen, you have
18 a question?

19 MR. MORTENSEN: Thank you, Tom.
20 Sorry. I'm just concerned about the fate. And
21 the last speaker said that the concentration was
22 so low that it was lower than the background

1 concentration in water, which I actually can't
2 believe.

3 But what is the, what concern do you
4 have about the fate of the silver in the run
5 state that comes off of these cleaning tables in
6 processing facilities?

7 MR. BIGELOW: If you look at the EPA
8 standards for ambient water standards for silver,
9 and I can't remember the PPM in the ambient water
10 standard.

11 But the idea that silver, when it
12 dissociates from the citrate ion, it's going to
13 become bound to cellular macro molecules. It's
14 highly unlikely that once bound it will be
15 effluxed from the cell.

16 Nevertheless, there is some cellular
17 influx. But one can easily suggest that silver
18 will become bound to cellular macro molecules in
19 neighboring cells, or in neighboring plant
20 tissue, to the levels that are insignificant,
21 according to the EPA and FDA safety evaluations,
22 based on their approved uses in food.

1 MR. MORTENSEN: So, you have these
2 dissolved and degrading microbial communities
3 that are in the water, streaming, coming out of a
4 facility. And probably the fate of the silver
5 that is contingent on the decomposition rate of
6 the single cell organisms, I would guess. Is
7 that right?

8 MR. BIGELOW: Yes. Yes. And the FDA
9 approval has an environmental impact assessment
10 associated with food contact use approvals. And
11 so, I had mentioned that in my written
12 statements. And so, your concern about silver
13 burden in the environment from SDC use, FDA in
14 approving the use in food had addressed that in
15 their environmental impact statement assessment.

16 MR. MORTENSEN: Okay. Thanks. I'll
17 go back and look at that. Thank you.

18 MR. MORTENSEN: Yes.

19 MR. BRADMAN: Tom, I had a question.

20 MR. CHAPMAN: Okay. Asa.

21 MR. BRADMAN: You made two comments at
22 the end of your initial comment period about, you

1 stated that, lack of approval will result in
2 approval of other, in other's silver material.
3 And you also I think said something about the
4 result in use outside compliance. Can you be
5 more specific about those statements?

6 MR. BIGELOW: Sure. There are
7 numerous silver based disinfectants approved by
8 the EPA. The one that's been petitioned to the
9 Board here is silver dihydrogen citrate, which is
10 ionic silver.

11 There are other silver disinfectants
12 that are approved by the EPA. The Board may
13 inadvertently approve the use of other silver
14 disinfectants that do comply with this
15 annotation.

16 The second thing is when you do put in
17 place adoptive annotation the, if, for one to use
18 an SDC they would still be outside the approval,
19 because it does not reflect the composition if
20 these other silver disinfectants were to be used.
21 The may fall outside the already regulated uses
22 of the silver.

1 MR. BRADMAN: So, this is specifically
2 about your concern about the particle size
3 annotation?

4 MR. BIGELOW: That's correct.

5 MR. BRADMAN: All right. Thank you.
6 I just wanted that clarification.

7 MR. BIGELOW: Yes. Yes, sir.

8 MR. CHAPMAN: Other questions? Okay.
9 Thank you for your comments here today. Up next
10 we have Dallas McCann. Dallas, are you on the
11 line with us? Going once, going twice, and I'll
12 skip over you. After Dallas we have Jane. Jane,
13 are you on the line with us?

14 MS. DEMARCHIE: Yes, I'm here.

15 MR. CHAPMAN: All right then, I can
16 hear you. And then after Jane we have Jean-
17 Marie. Jane, if you'd start with your name and
18 affiliation?

19 MS. DEMARCHIE: Sure. My name is Jane
20 DeMarchie. And I represent the American Food
21 Trade Association. AFTA represents over 700
22 member companies that produce food, the row

1 crops, vegetables, grasses, and cover crops.

2 We encourage the National Organics
3 Standards Board and the National Organics Program
4 to use AFTA as a resource for issues related to
5 food breeding and food working. These, oral
6 comments are exerted from our written comments,
7 that were also this submission.

8 AFTA supports the proposed regulatory
9 language changes of the Organic Food Regulations.
10 We understand that since the inception of the NOP
11 access to a broader, higher quality organic food
12 supply has evolved.

13 Concerning the organic seed guidance
14 AFTA would like to see the methods proposed to
15 verify organic seed usage, to be reflective of
16 how different types of organic growers supply
17 organic seeds.

18 Specifically, the value of using
19 variety trialing to judge rival performance is
20 accepted, and by all types of growers, even on
21 your farm, or through an internal trial location.

22 Comparatively, catalogues of

1 predominantly proprietary selection by small scale
2 growers only, they're not necessarily factual
3 records of proprietary performance in all
4 production locations and conditions.

5 AFTA strongly supports the change
6 specifying a minimum of five sources. We support
7 a refinement in the guidance that the sources be
8 companies that can actually offer organic seed
9 and planting stock of the equivalent variety. As
10 a result, in some cases fewer than five sources
11 will be able to be identified.

12 On the excluded methods many of us
13 that commute have made listed in the proposed
14 methods table of vital components of current
15 plant breeding, the fundamental concerns
16 regarding regimented criteria for disputed
17 methods.

18 AFTA opposes the proposed excluded
19 method of termination for transposons due to the
20 lack of surety around the definition, and the
21 prevalence of transposons in plants. As an
22 example, the lettuce genome is 75 percent

1 transposable elements, peppers 76 percent, maize
2 85 percent.

3 AFTA supports the determination that
4 embryo rescue should not be considered an
5 excluded method by an LSC. We also urge the
6 Materials Subcommittee not to include double
7 haploid technology in the list of excluded
8 methods.

9 AFTA does not support the testing
10 program proposed in the Materials Subcommittee
11 proposal on genetic integrity transparency in
12 seed grown on organic farms.

13 As the proposal stands it may have the
14 unintended consequences, depressing the growth of
15 the developing organic seed industry, and
16 reducing the depth and breadth of seed choices to
17 organic farmers.

18 The National Organic Program is a
19 process based standard, and AFTA continues to
20 believe that the contractual relationship between
21 the seed sellers, seed buyer, and existing seed
22 laws are already appropriate mechanisms to

1 provide assurances of seed quality. Thank you
2 for your time.

3 MR. CHAPMAN: Thank you. Any
4 questions from the Board? Harriet? Sorry.
5 Harriet, we had you muted. I didn't know if you
6 had a question or not.

7 MS. BEHAR: Yes. I have a question.

8 MR. CHAPMAN: Okay.

9 MS. BEHAR: So, I was wondering about
10 the transparency for the growers when the seed
11 company does not provide them with information on
12 the presence of genetic engineering in the seed
13 that may have, you know, probably was, you know,
14 happened there through no fault, you know, or
15 just, you know, out in the field.

16 It wasn't that it was actually
17 genetically engineered feed. But there can be a
18 detected contamination in that feed. And then
19 the producer doesn't know that it's present. And
20 yet they are hoping to meet a certain market that
21 will be testing.

22 How do you propose we deal with that

1 issue if we don't require some testing and
2 transparency? So, before the farmer buys the
3 seed they know what they're getting.

4 MS. DEMARCHIE: Sure. I think there
5 are different answers to that. One of the things
6 that we will recommend that growers are able to
7 look at the seed, the purity on the existing seed
8 tags, which in, you know, in many cases, you
9 know, require high, over, you know, over 95
10 percent. So, that is definitely a method for
11 indication. So, that's the purity of, the
12 genetic purity of that variety, you know.

13 And I think we're also, what our
14 members find is that in many cases growers are
15 asking for tests. And they are receiving that
16 data.

17 Our concern is with the structure of
18 the program, as it is written in the proposal. I
19 think we're definitely open to further
20 conversation about this topic.

21 And perhaps, you know, additional data
22 is needed before you go through the process of

1 establishing such an onerous testing requirement.

2 MS. BEHAR: Okay. No further
3 questions.

4 MS. ARSENAULT: Tom, are you there?
5 Tom, if you're talking you may be on mute.

6 MR. CHAPMAN: I'm on mute. I'm on
7 mute. Sorry. Looks like we figured out there's
8 no further questions, Jane. Thank you for your
9 testimony.

10 MS. DEMARCHIE: Thank you.

11 MR. CHAPMAN: And we'll move on to our
12 last public commenter, who is Jean-Marie. And I
13 think we had you muted. Jean-Marie, can you hear
14 us?

15 MR. NGORE TRAORE: I'm here.

16 MR. CHAPMAN: Yes, we can hear you.
17 If you could start with you name and affiliation
18 for the record?

19 MR. NGORE TRAORE: Yes. My name is
20 Jean-Marie Ngore Traore. I'm owner of a small
21 company, startup company, Wari Di Company. And
22 we are dealing with import and export organic

1 fruit.

2 We are concerned because we are going
3 to export to U.S. companies from France and
4 French Polynesia, and also from French Caribbean,
5 on the organic fruits.

6 Because we are familiar we are getting
7 also the exports to the U.S. that are already
8 grown. But our concern right now is to find from
9 American goods organics. Because our concern is
10 to import U.S. products to France.

11 The reason why, and the main concern
12 with dealing with the market, organic market.
13 They don't have mass production. We don't
14 produce enough. So, we need some organic foods.
15 And they don't believe that we have products are
16 organic.

17 So, we have a predilection for us,
18 particularly those products that are produced in
19 U.S. And also organic products. It is basically
20 our jobs to introduce some organic products in
21 France from U.S. That's it.

22 MR. CHAPMAN: Okay. Thank you for

1 your comments. I do know that the U.S. and
2 European Union have an equivalency related to our
3 organic standards, that do allow recognition of
4 one standard in the other jurisdiction, and vice
5 versa. I don't know if anyone from the program
6 wants to speak further to that.

7 MR. NGORE TRAORE: I know that the
8 standards with Ecocert. So, we cannot use the
9 U.S. But, what do you mean?

10 MR. CHAPMAN: So Ecocert is a certifier
11 who certifies to a specific standard. And the
12 European regulations, which I don't know the most
13 recent numbers, as well as the National Organic
14 Program, under the Organic Foods Production Act
15 in the U.S.

16 The Government, the European Union,
17 and the United States have determined each
18 standard's equivalent. And so, you can sell
19 products produced in the U.S. under the
20 equivalency arrangement into the European Union
21 without further certification, and vice versa.

22 (Off-microphone comment.)

1 MR. CHAPMAN: Any other questions for
2 Jean-Marie?

3 MS. OAKLEY: Yes. This is Emily. Can
4 you hear me again?

5 MR. CHAPMAN: Yes. We can hear you
6 loud and clear.

7 MS. OAKLEY: Thanks. So, Jean-Marie,
8 are you saying that French consumers don't
9 believe that USDA certified organic products are
10 organic? Is that what I heard you say?

11 MR. NGORE TRAORE: Yes. We are from
12 French products. They are organic certified.
13 And ready to go to U.S. But we are looking for
14 U.S. products to export which we import them,
15 ship them to France, to the markets, to the
16 European markets, yes.

17 So, other people produce standard
18 products, orange juice, apple juice, and all kind
19 of U.S. products, organic food, and so on, from
20 U.S. to export into the French market.

21 MR. CHAPMAN: So, this is the,
22 National Organic stands for, works the standards

1 related to organic production, particularly under
2 the U.S. standards. We're not a promotion board
3 for products produced in the U.S., per se.

4 But what you can look at is, there is,
5 on the National Organic web page, under the USDA
6 there's the Organic Integrity Database, OID. And
7 on there you can find a list of everyone who is
8 certified to the U.S. Organic Standards who is
9 based in the U.S. or in a non-equivalent country.

10 MR. NGORE TRAORE: Okay. Thank you.

11 MR. CHAPMAN: Any other questions?

12 All right. Jean Marie, thank you for your
13 comments.

14 MR. NGORE TRAORE: Thank you.

15 MR. CHAPMAN: And at this time we will
16 run through the public commenters that we skipped
17 over to see if they've been able to join the call
18 since then.

19 So, starting at the top of the list.

20 Jonathan Simpson? Is Jonathan Simpson here?

21 Matthew Luna? Is Matthew Luna here? Evan

22 Perkins? Is Evan Perkins here? And Dallas

1 McCann? Is Dallas McCann here?

2 All right. None of those folks are
3 here. Then it looks like we've reached the end
4 of our public comment webinar session. And we
5 will go into recess, and then reconvene in St.
6 Paul on Wednesday of next week.

7 I appreciate all the Board members and
8 the NOP staff time, as well as all the time from
9 the public commenters who provided comment here,
10 and waited on the line, or listened to other
11 comments given.

12 Again, this is highly valuable, as you
13 can tell from the questions that you get from the
14 Board members. This is probably one of the most
15 valuable pieces of back and forth feedback that
16 we can get.

17 So, I appreciate everyone's
18 participation. And I look forward to seeing
19 folks in St. Paul. Take care, and have a good
20 weekend, everybody. Thank you.

21 (Whereupon, the above-entitled matter
22 went off the record at 3:32 p.m.)

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C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: National Organic Standards Board
Fall 2018 Public Comment Webinar

Before: USDA

Date: 10-18-18

Place: webinar

was duly recorded and accurately transcribed under
my direction; further, that said transcript is a
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UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ORGANIC STANDARDS BOARD

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FALL 2018 MEETING

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WEDNESDAY,
OCTOBER 24, 2018

The Board met in Great River Ballrooms 1&4 of the Intercontinental Saint Paul Riverfront Hotel, 11 Kellogg Boulevard East, St. Paul, Minnesota at 8:30 a.m., Tom Chapman, Chairman, presiding.

PRESENT:

TOM CHAPMAN, Chair
HARRIET BEHAR, Vice Chair
SCOTT RICE, Secretary
SUE BAIRD
ASA BRADMAN
JESSE BUIE
LISA DE LIMA
STEVE ELA
RICK GREENWOOD
DAVE MORTENSEN

EMILY OAKLEY

A-DAE ROMERO-BRIONES

ERIC SCHWARTZ

DAN SEITZ

ASHLEY SWAFFAR

STAFF PRESENT:

**MICHELLE ARSENAULT, NOSB Advisory Board
Specialist, National Organic Program**
**SONIA JIMENEZ, Deputy Administrator, Specialty
Crops Program, Agricultural Marketing
Service**
**DR. PAUL LEWIS, Ph.D., Director, Standards
Division, National Organic Program**
CLARISSA MATHEWS, Ph.D., National List Manager
**DEVON PATTILLO, Materials Specialist, National
Organic Program**
**DR. JENNIFER TUCKER, Ph.D., Deputy
Administrator, National Organic Program;
Designated Federal Official**

ALSO PRESENT:

**DAVE FREDERICKSON, Commissioner, Minnesota
Department of Agriculture**
**JULIE GROSSMAN, Ph.D., Professor and Organic
Program Coordinator, University of
Minnesota**

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

2 8:35 a.m.

3 DR. TUCKER: Okay, everybody good
4 morning. We're going to get started here.
5 Welcome. We are officially opening the Fall 2018
6 National Organic Standards Board meeting.

7 My name is Jennifer Tucker. I'm the
8 Deputy Administrator of the National Organic
9 Program, which is part of the USDA's Agricultural
10 Marketing Service. I'll serve as USDA's
11 Designated Federal Officer for the meeting.

12 First, I want to thank everyone for
13 being here, making the trip to St. Paul,
14 Minnesota. I'm going to start by introducing the
15 AMS and NOP team. First next to me here is Dr.
16 Paul Lewis, our Standards Division Director.
17 Also supporting the meeting is our new National
18 List manager, Dr. Clarissa Mathews. Stand up
19 Clarissa.

20 (Applause.)

21 DR. TUCKER: I'd like to share a
22 little bit about Clarissa, who started in the

1 role in June. Most recently, she served as an
2 accreditation manager in our Accreditation and
3 International Activities Division in NOP.

4 Previously, Clarissa served as chair of the
5 Institute of Environmental and Physical Sciences
6 at Shepherd University, where she taught
7 Environmental Science, developed curricula in
8 sustainable food production and directed a
9 veterans to Agriculture training program.

10 Earlier in her career, Clarissa worked
11 at the USDA ARS Appalachian Fruit Research
12 Station in West Virginia. There, she
13 investigated ecological methods of managing
14 insect pests in orchards. Dr. Mathews earned a
15 Bachelor's of Science from the University of
16 Rochester and a Master's degree and Ph.D. in
17 Entomology from the University of Maryland.

18 So many of you have already interacted
19 with Clarissa since she became National List
20 manager, but let's give her another welcome.

21 (Applause.)

22 DR. TUCKER: We also have Devon

1 Pattillo who folks know well, and who is an
2 amazing member of our Standards team. I'm going
3 to tell you more about Devon later, and then also
4 in the room we have Betsy Rakola, NOP's
5 Compliance and Enforcement Division Director.
6 Betsy's done terrific work.

7 (Applause.)

8 DR. TUCKER: Betsy's done terrific
9 work on the Enforcement side over the past year
10 and a half, and I'm really glad she's with us
11 here this morning. Betsy also has a birthday on
12 Friday, so wish her a happy birthday at the
13 break. Yea, happy birthday.

14 We also have a guest from another part
15 of AMS, Sonia Jimenez, who is the Deputy
16 Administrator for the AMS Specialty Crops
17 Program. Sonia, we're very happy to have you
18 here.

19 (Applause.)

20 DR. TUCKER: Later this morning, I'll
21 be talking about a new learning management system
22 for organic inspectors and certifiers, and we

1 would not be able to be where we are with the
2 project without Sonia's team. They already have
3 an infrastructure that we've plugged right into.
4 She's been enormously helpful. So Sonia, thank
5 you so much.

6 Next, I want to introduce and thank
7 Michelle Arsenault, our advisory board
8 specialist.

9 (Applause.)

10 DR. TUCKER: These meetings would not
11 be possible without Michelle. She does amazing
12 work to bring us together each and every time.
13 So again Michelle, thank you so much. I now want
14 to welcome our two new members to the National
15 Organic Standards Board, four of whom were
16 appointed earlier this year.

17 So Dr. James Greenwood from California
18 is an environmental protection and resource
19 conservation -- sits in the Environmental
20 Protection and Resource Protection seat. Jim, go
21 ahead and tell the audience about yourself.

22 DR. GREENWOOD: First of all it's a

1 real pleasure to be here. I'm a faculty member
2 at UCLA in the Department of Epidemiology, and
3 also a professor within the Institute of
4 Environmental Sustainability. One, partly for
5 this group, I've been an organic avocado grower
6 in southern California for probably the last 15
7 years, and if any of you have any influence, we
8 need rain, okay. So that's the issue.

9 This year we got three inches of rain,
10 and I know my colleagues on the Board, some of
11 them had three inches of rain in an hour. So
12 it's a big issue in southern California. But
13 again, it's a pleasure to be here and I look
14 forward to working with all of you.

15 DR. TUCKER: Thank you very much,
16 welcome. And we also have Mr. Eric Schwartz,
17 also from California, and he is on one of our
18 Organic Handling seats. So Eric, your turn to
19 introduce yourself to the group.

20 MR. SCHWARTZ: Well good morning.
21 Like Rick, it's a pleasure to be here. I
22 currently work for a vegetable cooperative,

1 represent 50 growers. It's about 160,000 crop
2 acres in California for leafy greens. Our
3 cooperative has about 70 percent of the organic
4 leafy greens that are grown in the west coast.

5 Prior to that, I worked for Dole for
6 a number of years in both their conventional and
7 their organic program. I was there from the
8 beginning when they started their organic salad
9 line. Prior to that, spent a lot of years in
10 processing at Kraft for Birds Eye.

11 In fact, I remember many times going
12 down to Waseca and I learned how to do that in
13 the winter time. But it's a pleasure to be here,
14 and I'm looking forward to it. Thank you.

15 DR. TUCKER: So welcome to both of
16 you. To mark the occasion, I have letters here
17 signed by Secretary Perdue, welcoming you to the
18 Board.

19 (Off microphone comments.)

20 DR. TUCKER: Okay, I'm back. Okay.
21 So here is a quick overview of our three-day
22 agenda. This morning, we will hear from two

1 very, very special guests. We're really honored
2 to have them here.

3 Mr. Dave Frederickson, a past
4 Commissioner of the Minnesota Department of
5 Agriculture, and Dr. Julie Grossman, professor
6 and organic program coordinator from the
7 University of Minnesota.

8 Then we'll hear an NOSB update and
9 I'll provide an NOP update. The rest of the day
10 will be dedicated to public comments. Tomorrow,
11 we'll continue public comments and then turn to
12 the subcommittees. This will continue into
13 Friday, and then we'll close Friday with
14 administrative activities, officer elections and
15 a look ahead.

16 To close, I'd like to give a special
17 thank you to Tom Chapman, chair of the Board and
18 chair of this meeting. This is Tom's fourth
19 meeting chairing the Board. Let's give him a
20 round of applause in advance for braving it.

21 (Applause.)

22 DR. TUCKER: Tom, I am handing it over

1 to you.

2 MR. CHAPMAN: Thank you, Jennie.
3 Thank you for right nice introduction. Hello and
4 welcome everybody. Thank you for traveling here
5 today to participate and observe the fall
6 National Organic Standards Board meeting. I hope
7 everyone traveled safely and is enjoying
8 Minnesota's warm hospitality and chilly weather.
9 This is a bit of a contrast from our last
10 location in Tucson.

11 Still, Minneapolis and St. Paul are a
12 fitting location for our NOSB meeting, well-
13 steeped in food production amongst other
14 industries. The Twin Cities came to prominence
15 by harnessing hydropower to melt grain into
16 flour. Given that history, I think it's a
17 fitting place for us to have our NOSB meeting.

18 With that, I'd like to take a moment
19 to introduce or have the members introduce
20 themselves, the other 13 members, and we'll start
21 down here with A-Dae.

22 MS. ROMERO-BRIONES: Good morning. My

1 name is A-Dae Romero-Briones, and I am Cacatua
2 and Kiowa. I currently serve as the Director of
3 Programs for Fresh Nations Development Institute,
4 and my home base is in Lodi, California.

5 MS. DE LIMA: Hi. I'm Lisa de Lima.
6 I'm in the retailer's seat. I work at Mom's
7 Organic Market as the Vice President of Grocery.
8 It is my fourth year on the Board.

9 MR. BRADMAN: Asa Bradman from UC-
10 Berkeley, School of Public Health, Center for
11 Environmental Research in Children's Health.
12 I've worked for many years at environmental
13 exposures and agricultural issues in California.

14 MR. ELA: Steve Ela, Ela Family Farms,
15 organic fruit grower in western Colorado.

16 MR. MORTENSEN: Dave Mortensen from
17 the University of New Hampshire. My background
18 is in food systems and agro-ecology.

19 DR. SEITZ: Good morning. My name is
20 Dan Seitz. I serve in a consumer seat, consumer
21 member seat. I'm the Executive Director of the
22 Council on Naturopathic Medical Education, and

1 also a board member on a food co-op, and I live
2 in Great Barrington, Massachusetts in the
3 Berkshires of western Massachusetts.

4 MS. BEHAR: Hello. I'm Harriet Behar.
5 I work with the University of Wisconsin Organic
6 Laboratory, and I live on a farm. I've been a
7 certified organic farmer for almost 20 years. I
8 live in Gays Mills, Wisconsin, and believe me Tom
9 it gets a little colder than this.

10 MR. RICE: Good morning. My name is
11 Scott Rice. I am in the certifier seat, and I am
12 the External Affairs Coordinator with the
13 Washington State Department of Agriculture
14 Organic Program. This is my third year on the
15 Board.

16 MS. SWAFFAR: Hi, I'm Ashley Swaffar.
17 I'm in the producer's seat. I'm from
18 Fayetteville, Arkansas. I have a small organic
19 mixed vegetable farm and I'm also the Director of
20 Animal Welfare and Food Safety for Handsome Brook
21 Farm.

22 MR. BUIE: Good morning. I'm Jesse

1 Buie, president of Ole Brook Organics. I sit in
2 a farmer's seat and I think this is my second
3 year.

4 (Off microphone comments.)

5 MR. BUIE: Third? Goodness, okay.

6 MS. BAIRD: Hi. I'm Sue Baird. I'm
7 from Missouri. I'm the Executive Director of
8 Mid-America Food, Mid-America Organic Association
9 and Mid-America Food Hub. I serve as special
10 interest group and so thank you for having me.

11 MS. OAKLEY: Emily Oakley, Three
12 Springs Farm, Oklahoma, and I'm in a farmer's
13 seat. This is also my third year.

14 MR. CHAPMAN: And I am Tom Chapman
15 from Clif Bar and Company, where I work as the
16 Director of Ingredients Sourcing, and I sit in
17 the handler's seat. This is my fourth year on
18 the Board. Thank you everyone for the
19 introductions. As Dr. Tucker mentioned, we have
20 two special guests here this morning, and I
21 would like to introduce our first guest.

22 Our first honored guest is Dave

1 Frederickson, who served as -- who serves as
2 Commissioner of Minnesota Department of
3 Agriculture since being appointed by Governor
4 Mark Dayton in 2011. Frederickson was elected to
5 the Minnesota Senate in 1986, where he served two
6 terms. He was president of the Minnesota Farmers
7 Union from 1991 to 2002, and president of the
8 National Farmers Union from 2002 to 2006.

9 At both organizations, he worked on
10 federal farm policy and other issues important to
11 farmers and ranchers. Frederickson continued his
12 work on federal policy at Agricultural Outreach
13 Director for U.S. Senator Amy Klobuchar from 2007
14 to 2010, and the Frederickson family, family
15 roots in farming go back to 1873. So he can
16 maybe teach us a little bit about that grain
17 mill.

18 He and his wife Kay have operated a
19 farm in Murdoch, Minnesota for more than 20
20 years. Commissioner Frederickson's farming
21 background and his wide range of experience in
22 public service have given him the unique insights

1 to challenges facing Minnesota's agricultural
2 industry.

3 Today, he is focusing on ensuring
4 Minnesota's Department of Ag fulfills its mission
5 to protect the integrity of our food supply, the
6 health of our environment and strength of our
7 organic agricultural economy. These missions are
8 close to the organic community both in the U.S.
9 and in Minnesota, and I welcome Commissioner
10 Frederickson and ask him to share to some remarks
11 with us.

12 (Applause.)

13 MR. FREDERICKSON: Thank you very
14 much, Mr. Chairman. Excuse me. Where did you
15 get that lengthy bio? I'll tell you, that needs
16 to be cut down. I'm a Norwegian Luther, and I
17 was born guilty and so I just can't deal with
18 that at 8:30 in the morning.

19 (Laughter.)

20 MR. FREDERICKSON: It's too much.
21 Nonetheless, what you probably took away was I
22 can't hold a job.

1 (Laughter.)

2 MR. FREDERICKSON: Again, Dr. Tucker
3 and Mr. Chairman and members of the Board, what a
4 great pleasure it is for me to be here with you
5 today to welcome you to the great city of St.
6 Paul. Most people say well, you're from
7 Minneapolis, and I say hell no, I'm from St.
8 Paul. I live in St. Paul, one of the twin
9 cities.

10 So it's great to have the
11 acknowledgment that St. Paul actually exists.
12 Good to be here and thank you for choosing St.
13 Paul. A wonderful venue here close to the river,
14 so it's exciting hopefully for you to be here and
15 certainly exciting for me to be here to welcome
16 you.

17 And again, I have to mention my
18 colleague, Harriet. We've had a little fun back
19 and forth about who's the coldest state, and so
20 if that's all the far we get with the rivalry,
21 I'm okay with that. Oh, I forgot to mention the
22 Packers and the Vikings. Yeah, that's part of

1 our history also.

2 Again, let me give you a little bit of
3 history myself, rather than I'll give you the
4 short -- why don't I do it this way? I'll give
5 you the short life story in about two minutes. I
6 was born the middle child of three kids. I was
7 born in 1944. Yes, that makes me an old man
8 today. I'm 74 and knocking the door on '75. I
9 flunked retirement once, I don't plan to flunk
10 again.

11 I thought it would be a good idea to
12 farm, and my dad said good gosh no, go get an
13 education. You can always farm, which I thought
14 was -- it was appropriate in 1962. You could.
15 Today it's a whole different story for people in
16 terms of you could always farm. It's sort of
17 farm now, he should have said, because you could
18 always go to school.

19 So I went to school and my sister
20 graduated from the University of Minnesota at a
21 little campus in Morris, Minnesota. My brother
22 graduated from the University of Minnesota. I

1 went off to a state university and I taught
2 school for eight years before Kay and I, my
3 spouse of 53 years, we were married in 1965. She
4 was an Irish Catholic Katherine Ann Kennedy, and
5 I was a Norwegian Lutheran.

6 Lived seven miles apart. We were
7 ecumenical before the word was popular and we
8 married in '65. They called it a "mixed
9 marriage" at the time, and he actually hate
10 another one now, but by God we're going to show
11 that we can make.

12 No, we thank you. I taught for eight
13 years. I taught behavior problem kids. Many of
14 them are members of the Board now, and when my
15 father's health failed, I chose to -- my wife and
16 I chose to go back to the farm.

17 And so we did. We went back in 1974,
18 and farmed there until 1999. And then eventually
19 leased the farm and eventually sold it to a
20 cousin. So we no longer farm. We had two
21 daughters, neither of them interested in farming
22 and just made the decision one day to sell it to

1 a cousin. He said he was helping me, and he said
2 you're never here anyway so why I don't you sell
3 it to me, and I said sure, why not?

4 So I did. One major mistake, I should
5 have kept it for a few more years, and I would
6 have had a shot at being a millionaire, but I
7 didn't quite make it. So always a matter of
8 farmer mentality I guess it is. You know, sell
9 low right, make it in volume or something along
10 those lines.

11 We spent 25 years there. I in the
12 meantime got angry at a state senate, my state
13 senator and foolishly decided to run against him
14 no expecting to win. Just thought somebody's got
15 to this, and did and accidentally won the election
16 by 32 votes. We had two small kids at the time
17 farming about 1,200 acres of corn and soybeans.

18 My salary at the legislature was
19 \$22,900 and I hired a hired man for 25,000.
20 Brilliant move. But I spent two terms in the
21 Senate, and some people don't recognize this but
22 early on I recognized that in my second term that

1 every now and then an innocent person is sent to
2 serve in the legislature, and so I thought this
3 was a good time to exit.

4 And so I did, and was headed back to
5 the farm to see if we couldn't, you know,
6 actually turn a profit. I was sidetracked to the
7 Minnesota Farmers Union and I spent what I
8 thought would be just about six months filling an
9 unexpired term of the president. That turned
10 into nearly 11 years.

11 At the end of those 11 years, I ran
12 for and was selected to serve as president of the
13 National Farmers Union. I traveled to our office
14 at the time was Denver, Colorado, and so I
15 maintained an apartment in Denver, a home in
16 Minnesota and a hotel room in Washington, D.C.

17 I was back here traveling out to a
18 little meeting in Woodstock, Minnesota. Not the
19 one that you people with beards remember, but the
20 one out by Pipestone. Actually, they say if you
21 remember Woodstock you weren't there. Yeah.

22 (Laughter.)

1 MR. FREDERICKSON: Anyway, on the any
2 I fell asleep at the wheel and I drove up the
3 back end of a grain truck. I was doing about 60
4 miles an hour and she was doing about 30, and I
5 totaled a pickup, ended up in the hospital. My
6 wife had to come out and pick me up and said
7 that's kind of scary. I'd been on the road a
8 significant amount.

9 A couple of months later -- I survived
10 it, got a new pickup out of the deal, I was
11 flying back to Mexico City through Houston on up
12 to the Twin Cities and the plane was struck by
13 lightning, and this huge ball of fire went out
14 from under the plane and I thought -- and the
15 lights flashed and the wings rocked and people
16 were screaming.

17 I thought to myself I think I'm ready
18 to retire. I think I've just received a sign
19 from someone, and I was able to retire at that
20 point. I sat around and stared out of the window
21 after leaving, at the end of my term. One day my
22 wife said you remember the vows we took in '65?

1 I said of course.

2 Well, I'm okay with in sickness and in
3 health. That's great, I'm happy about that.
4 I'm actually okay with "until death do us part."
5 Good. Where is this going? She said I am
6 certainly not okay with you being home for lunch,
7 so go find something to do.

8 So I did. Our U.S. Senator, our
9 senior Senator was elected to serve in the United
10 States Senate. Amy is a long-time friend, and
11 asked if I would come and work with her on her ag
12 policy and ag outreach issues. So I was right
13 here in the Twin Cities for the first four years
14 of her term.

15 Our governor was elected, Mark Dayton,
16 and asked if I'd come over to the Department, and
17 I've been there for two terms. He survived the
18 first term. My role is basically to keep his
19 name out of the paper for bad things and ensure
20 that it gets in there for good things. I've got
21 two and a half months so far left. So far, so
22 good. But that makes me a really dangerous lame

1 duck, I suppose, at the end of the day.

2 So that brings us here. You know a
3 little bit about me at this point. My plan for
4 retirement is to -- I've been working on an old
5 boat for the past 20 years. I've finally got it
6 done and I plan to drop it in the Mississippi
7 here and take it to New Orleans in June or July
8 of next year, Mississippi Solo.

9 It should be great fun. I'm excited
10 about it. It's about 1,850 miles. The boat is
11 18 -- you know, my boat is so small and the
12 river's so large. So it's a little scary, but
13 you know, I've had a good life, right? So I'm
14 looking forward to it. It should be great. I
15 have a lot of friends up and down the river. I
16 met one right now, Adam Wartheson, who says call
17 me when you get to Winona, so what are friends
18 for if you can't call them and use them once in a
19 while.

20 I have an outboard, so I'll be needing
21 gas, Adam, at some point. I had a chance to
22 again read your incredible bios. Last night, I

1 entertained myself by reading all about you. You
2 know a little about me and I know a lot about
3 you, except for Rick. Your bio was not present
4 on the website quite yet. But that -- yeah,
5 yeah, yours.

6 But everyone else around here, hello,
7 I know you. Great to see you again. What an
8 incredible group of people. I'm just so excited
9 to get a chance to read about you, read about
10 your history. Jesse, I read all about you in
11 your bio. What an incredible experience, and I
12 don't like you remember whether it's two or three
13 years either, so don't feel bad, you know.

14 Just I'm just so impressed. Scott
15 Rice, I know your director very well, Director
16 Sadison (phonetic). I spent last week with him
17 in Monterey in Mexico. We had a great
18 opportunity to work with the Tri-National Accord,
19 and thank you to USDA for pulling together the
20 now new NAFTA agreement.

21 I can't remember the initials. I
22 guess it's USA, something to do with -- help me.

1 Yeah, sort of like that, you know, the Village
2 People, right.

3 (Off microphone comments.)

4 MR. FREDERICKSON: Got it. Some of
5 you got it, right? But thank you. Thank you
6 because otherwise that meeting, that Tri-National
7 Accord would have been difficult, and it is the
8 Ministers of Agriculture from Mexico, the
9 Ministers of Agriculture from the provinces in
10 Canada, and the directors, secretaries or
11 commissioners that serve in the states in the
12 United States.

13 We have met over the course of 27
14 years, and generally it is pretty friendly. I
15 was worried this year to go in and talk about the
16 negotiations, but the good news is it's done.
17 And so my hat's off to the administration for
18 working through this process and making things
19 better.

20 I'm still concerned about the 232
21 tariffs that are still in place. Right now,
22 agriculture is held hostage and we are collateral

1 damage across the state and across the country.
2 We're not price-setters. Farmers are price
3 takers, and consequently we need that to get
4 behind us as fast as we can.

5 I believe that there's a significant
6 amount of new interest in organic agriculture,
7 and there's a new generation coming on board that
8 are extremely interested in my earlier comments
9 about the difficulty of getting into agriculture
10 I think lend itself today to this new generation
11 that are stepping up, saying I want to be
12 involved in agriculture, but I view it
13 differently.

14 I view it from an urban warehouse,
15 where I can grow things in the city and I can do
16 it in a climate such as Wisconsin and Minnesota,
17 where we can maximize our opportunity to grow
18 food. We have that happening time and time and
19 time again here in the Twin Cities. I'm really
20 proud of that. I'm proud of the work that the
21 Minnesota department is doing.

22 Our efforts to promote organic

1 agriculture range from grants, loans. Our
2 organic certification cost share, we've certainly
3 helped with that process. One of our jewels in
4 the crown, if you will, is our organic
5 conference, which we've held for the past 15
6 years.

7 We have somewhere in the area of six
8 to seven hundred people up at that area. You
9 were there, I believe, last year and spoke. It's
10 a conference that's sponsored by the Minnesota
11 Department of Agriculture. Thank you for being
12 there and sharing your 30 plus years of wisdom in
13 organic agriculture. Learned that from your
14 resume and today.

15 A couple of years ago, I had an
16 opportunity to travel to Cuba, to spend some time
17 understanding their organic structure of
18 agriculture. It all happened because of what
19 they refer to as their special period. That's
20 when the Soviet Union crumbled, and all of the
21 resources that were flowing to Cuba dried up.

22 Literally per capita, they lost

1 weight. They didn't have the food, and so at
2 that time they determined that they had to be
3 more self-sufficient. So they entered a period
4 of rapid expansion of organic agriculture. I had
5 the opportunity to spend time with Fernando
6 Funes. The farm is called Finca Marta, named
7 after his mother.

8 He is Ph.D. There is an abundance of
9 Ph.D.'s in Havana and certainly Cuba because they
10 can go to college for free. He is an excellent
11 spokesperson for organic agriculture, and we were
12 fortunate to invite me to come to Minnesota and
13 speak to our organic agriculture conference in
14 St. Cloud a couple of years back. We've had
15 breakout sessions at those workshops.

16 Fernando took part fully during the
17 time that he was here, and I will be going back
18 to Havana on the 6th of November this year, and
19 we'll be able to have a chance to be out at his
20 farm and his spouse, and see some of the growth
21 that's taken place on the farm over the past few
22 years. I'm excited about that.

1 Let me just say that from a Department
2 perspective in the work that we do, Minnesota has
3 added more than 15,000 certified organic acres to
4 its landscape, actually bringing the total number
5 of certified acres to more than 130,000 in the
6 state. We rank first nationally in the value of
7 organic cow milk sales. We rank second in
8 organic corn, soybean production and turkey
9 sales.

10 We produce about 15 percent of the
11 nation's organic oats, with exactly 714 certified
12 organic farms, we rank 7th in the United States
13 and account for roughly four percent of the
14 nation's certified organic farms. Again, keep in
15 mind 714.

16 We have in Minnesota 73,000 farms. In
17 1945, we had 180,000 farms. And so you can see
18 what's happened. We didn't create less land or
19 more land. We just lost people on the land, and
20 you can drive across the state of Minnesota, the
21 state of any state and you will see the impact in
22 small communities that has occurred in those

1 regions of the state and it's disappointing.

2 So our one hope, of course, is to see
3 organic agriculture grow, because we will see
4 those numbers of farms move up instead of down.
5 Organic sales are also strong in Minnesota, as
6 consumers continue to value foods grown and
7 raised using minimal off-farm inputs in ways that
8 restore, maintain and enhance ecological harmony.

9 The latest USDA certified organic
10 survey published in September puts the value of
11 organic sales in Minnesota at more than \$106
12 million, a 16 percent jump by the way since 2016.
13 The work we do would certainly not be successful
14 without a tremendously strong partnership that we
15 have fostered with Minnesota's organic industry,
16 and you're going to hear in just a few seconds
17 from my colleague at the University of Minnesota.

18 They are such an incredibly strong
19 partner as we move forward hand in hand to strive
20 to be supportive of the organic sector. We do
21 this also through regular meetings with our
22 Organic Advisory Task Force, many of whom are

1 here today. I see Jim Riddle in the back, former
2 member of the Board.

3 This team that guides our work to best
4 utilize available resources for outreach and
5 technical assistance for Minnesota's organic
6 producers is incredibly helpful to us at the
7 Department of Agriculture. We continue to use
8 them to spread the word and spread the message
9 across the state, but more particularly through
10 the Minnesota legislature in efforts to move our
11 program along.

12 With that, your agenda is heavy and
13 I'm looking forward to hearing from my partner
14 from the University of Minnesota. Thank you very
15 much. Again, welcome to Minnesota, where there's
16 snow on the roof and water in the basement all on
17 the same day.

18 (Applause.)

19 MR. CHAPMAN: So we also have DR.
20 Julie Grossman from the faculty of the Department
21 of Horticultural Science at the University of
22 Minnesota here today. She is also the organic

1 program coordinator of the College of Food,
2 Agriculture and Natural Resource Sciences. Julie
3 received her Ph.D. from the University of
4 Minnesota in Agronomy and Soil Science, and then
5 was an NSF post-doctoral fellow at Cornell
6 University.

7 She was faculty at North Carolina
8 State University in the Department of Soil
9 Science prior to arriving at UMN in 2014.

10 Julie's research explores management of plant,
11 soil and microbe relationships to enhance soil
12 fertility and organic systems, especially the
13 process of biological nitrogen fixation and
14 legume cover crops.

15 Julie has a strong interest in
16 sustainable agricultural education, is the former
17 chair of the Sustainable Agricultural Education
18 Association. She has authored over 45 peer-
19 reviewed articles, with the majority emphasizing
20 soil fertility, management and organic systems.

21 Dr. Grossman, I welcome you to share some
22 comments here today.

1 (Applause.)

2 DR. GROSSMAN: Thanks Tom for that
3 nice introduction. How does this sound? Good,
4 okay. I want to also thank the USDA, AMS and the
5 NOP for inviting me to be here today. This is
6 real pleasure. This is my first meeting. I was
7 excited to hear that I had 20 minutes. I kind of
8 couldn't believe it, and Michelle said oh yeah,
9 we want you to give some opening remarks.

10 I said oh great, how long? Five
11 minutes, six minutes? No, we have 20. So I'm
12 going to take full advantage of those 20 minutes.
13 For those of you who are coming here from out of
14 state, the University of Minnesota you might know
15 is one of the few comprehensive land grant
16 institutions. So we have all disciplines
17 represented at the university. We have about
18 50,000 students across the state. So we're a
19 very, very big university.

20 Within the cities, we have two
21 campuses. So we have the St. Paul campus and the
22 Minneapolis campus. St. Paul campus houses some

1 of the natural resource departments, some biology
2 and all the agriculture. Also you'll hear me
3 talk a little bit later about how lucky we are,
4 because we're right here in the middle of the
5 city.

6 We actually have research and
7 educational land, certified organic land, about
8 six acres, that we can use to teach students. I
9 was really excited to hear the Commissioner talk
10 about the new generation. That's what I'd like
11 to talk about today. If you guys want to talk to
12 me about my research, we can do that later. I'm
13 not going to touch, talk about that very much.

14 But what I really want to do is share
15 some personal reflections on how organic
16 agriculture and especially academic agriculture
17 education has changed in the last 30 years. It's
18 really taken some huge strides, and what I want
19 to argue is that by the way we're training those
20 students, that's going to -- they're going to be
21 the ones sitting in this room in 20 years.

22 So we need to think beyond just how

1 we're training them to carry out production,
2 thinking about all aspects of organic
3 agriculture, from policy and decision-making
4 skills to critical thinking skills to the
5 economics of organics. Somebody, those students
6 need to understand everything. So that's really
7 what we're trying to do at the University of
8 Minnesota, but also at many other land grant
9 institutions around the country.

10 About 20 to 30 years ago, as many of
11 you know, if you have a student that wanted to do
12 organic agriculture or sustainable agriculture,
13 there were really only a few fringe institutions,
14 you might say, that they could go to. I'm sure
15 many of you know what those are. Many of them
16 were found at small liberal arts colleges.

17 I was at a small liberal arts college,
18 not one that focused as agriculture. I was at a
19 small college called Simmons College in Boston.
20 I was a top biology student without about 15
21 other biology majors, most of whom wanted to
22 become doctors. That was, I wanted to make some

1 change in the world, but that really wasn't on my
2 radar screen. I didn't want to be a doctor.

3 So at some point in college I made
4 this link between social justice, environmental
5 science, biology, food access and all of the
6 sudden I found myself in agriculture, in the
7 middle of Boston, which was a tricky place to be
8 when you wanted to study agriculture.

9 I remember the day going in and
10 talking to my advisor, and saying you know I
11 think I figured it out. I think I know what I
12 want to do. I want to, I want to study farming.
13 My zoologist advisor was like well, there is an
14 ag school somewhere in the middle of the state
15 maybe you can go, and you can study there. You
16 can go to their library, so I --.

17 So long story short, I ended up doing
18 a senior research project, which interestingly
19 was on hairy vetch. Anybody know Drumlin Farm in
20 Boston, outside of Boston? So I worked on
21 Drumlin Farm, and at the time the manager of the
22 farm, whose name I can't remember, says oh we're

1 trying this new crop. It's called a cover crop,
2 and we're going to be looking at -- it's hairy
3 vetch and it survives the winter.

4 I was like ooh, that's great. So we
5 went, it was the worse research project ever. He
6 said we want you to go and see how well it
7 survives. So diligently every month went out to
8 this farm and I laid down this quadrant, a square
9 and I would count the number of plants that
10 existed in January, February, March, and it
11 didn't really change, because they were sitting
12 there frozen.

13 So it was just a total bomb, but the
14 nice side of it was that I am still working with
15 hairy vetch in my research. So those, even
16 though I'd say I probably didn't learn all that
17 much about hairy vetch and nitrogen fixation,
18 that experience of being on a farm and working
19 with a manager had a profound impact on me and
20 really got me to where I am today and what I'm
21 working on. So those experiences are really,
22 really important for students.

1 So around that time, this was about
2 the late 90's, sustainable agriculture programs
3 were really starting to boom in higher education.
4 So youth were getting excited about organic
5 agriculture. They were looking for, they were
6 seeking programs that focus on that. But then
7 when you found a program, they primarily taught
8 you how to grow the food, you know.

9 You could grow the food, you could
10 produce the food, you could have an abundance of
11 produce or whatever it was you were choosing to
12 grow. But there were a lot of really critical
13 skills that were left out of that that, that
14 education. So things like marketing, economics,
15 policy, those elements I mentioned earlier.

16 This meant that future farmers or
17 those working with farmers had to learn these
18 skills on the job, and they often had somewhat
19 dire consequences as you know, because they had
20 to decide at some point where they were going to
21 have their operation be viable or produce a high
22 quality of life for themselves, and how to

1 balance those was really, really tough.

2 So we really, we needed to make a
3 shift in how we were thinking about that
4 interdisciplinary aspect of education. So a lot
5 has happened in the last 30 years, especially at
6 the land grants. But many of these programs
7 started out as very small fringe, or at least
8 many started out as fringe universities.

9 Now I would say at many land grant
10 institutions if not most, it is integrated
11 organics and sustainable ag education has been
12 integrated throughout the curriculum, with many
13 programs focusing exclusively or allowing a
14 student to focus exclusively on organics, which
15 is really, really exciting.

16 Here at the University of Minnesota,
17 we are privileged to have the Minnesota Institute
18 for Sustainable Agriculture. Lisa, how many know
19 MISA? Okay. They've been around for a very,
20 very long time and they just actually celebrated
21 their 25th anniversary last year. Their goal is
22 to bring together the students and faculty and

1 staff at the University of Minnesota with
2 producers and community working within
3 sustainable agriculture.

4 So I wanted to give a shout out to
5 them, because they've really been instrumental in
6 making Minnesota a hotbed for sustainable
7 agriculture. So I, in my -- here in the bio, I
8 went to graduate school here and then I went
9 away. I was gone about 11 years in North
10 Carolina. I taught at -- I was at Cornell and
11 then at North NC State, where I was in the Soil
12 Science Department, but I always sort of watching
13 Minnesota and thinking I'd love to come back at
14 some point and be based here.

15 Sure enough, about four years ago,
16 they created a new major, this was before I
17 arrived. It was called a Food Systems major.
18 It's interdisciplinary, undergraduate educational
19 major that focuses on all those aspects of the
20 way I think our students should be trained. So
21 the food production, but also the other elements
22 as well.

1 So I applied and came back very
2 excited to be working with this program. We now
3 have about 60 students in the major, so it's
4 growing every year. Many of them are in a track
5 that's designated exclusively for organic and
6 local production.

7 So students that are primarily focused
8 on production, interested in production but the
9 major also asks them to take classes that gets
10 them to learn critical thinking skills, systems
11 thinking skills, things that traditionally were
12 not rooted in such majors.

13 I mentioned we also have six acres of
14 certified organic land. That's right out the
15 back door in St. Paul. How many of you know the
16 St. Paul campus? Okay, so you know it. So it's,
17 you know, it's not -- it's in the city. It's on
18 the edge of St. Paul, but it's -- you can get on
19 a bus and in ten minutes you're in downtown
20 Minneapolis.

21 So it's a really nice opportunity for
22 student learning, for students coming from an

1 urban background. Having those six acres outside
2 of our classrooms provides an incredible
3 opportunity for students to learn about organic
4 production.

5 So I teach a class that's called
6 organic farming, farming and management. It's a
7 lot of biology, but we also integrate other
8 aspects as I think are important into this --
9 into the concepts we teach.

10 But we use that land to teach students
11 about practical skills as well, and in fact we're
12 one of the few universities that have that.
13 We're very, very lucky, because we can teach in
14 the morning and then go in the classroom and then
15 go out in the afternoon to the land and use that
16 for our lab. It really is our lab. We spend
17 time outside on that land.

18 The six acres of land, even though it
19 may sound small, also provides a lot of
20 opportunities to research to take place. So I'd
21 like to spend some time today highlighting some
22 the diverse research projects that are taking

1 place at the University of Minnesota. As a land
2 grant institution, we are obligated to conduct
3 research with results that are keenly relevant to
4 the stakeholders in the state.

5 And so one of the things I've noticed
6 and now comparing to other universities is the
7 University of Minnesota really does a nice job of
8 intentionally bringing together faculty across
9 disciplines to carry out some of these projects.
10 So for example as a soil scientist, I work very
11 closely with economists, to make sure that things
12 that we develop in our research or relevant
13 economically to growers. So that's a nice
14 network that we have at the university.

15 The first project I want to highlight
16 is one being directed by Dr. Mary Rogers. So
17 she's an assistant professor on the Department of
18 Horticulture Science at the U. One problem that
19 faces organic farmers in our region is the
20 appearance of the invasive spotted wing
21 drosophila.

22 It's an invasive pest to soft skin

1 fruit and berries, and has been responsible for
2 significant economic damage around our state. So
3 host plants for the spotted wing drosophila
4 include strawberries, blueberries, raspberries
5 and cherries. And, you know, many of you I'm
6 sure think about fruit flies and you think about
7 the flies land on rotting fruit.

8 The problem of course with spotted
9 wing drosophila is that it doesn't lay its eggs
10 on rotting fruit. It lays its eggs on fresh
11 fruit. So what happens? You end up harvesting
12 your fresh fruit, you take a bite of your fresh
13 fruit and you get a nice big worm and you're
14 frustrated. Anybody, how many of you have heard
15 of spotted wing drosophila? So many. So it's
16 becoming a big problem in our area.

17 Minnesota growers were losing
18 approximately \$2.2 million due to spotted wing
19 drosophila-related damage. So this really made
20 this problem one of thoughtful solutions. So
21 Mary has been working on this for about four
22 years, and their work is showing that the best

1 management practices to control spotted wing
2 drosophila in organic systems are things like
3 exclusion using tunnels. So plastic tunnels are
4 a season extension.

5 In-season sanitation, frequent
6 harvesting of the berries and cultivar selection
7 to avoid those peak spotted wing drosophila
8 population times. The results or recommendations
9 are being made widely available around the state.
10 We have seminars. I think she said -- and
11 workshops and webinars. I think she said she
12 gave approximately 20 talks just last year alone
13 to stakeholders who were interested in this
14 issue. So we're doing some really great work.

15 The second example is actually in our
16 group, taking place on the down low in the soils.
17 So we're a bunch of soil biology geeks and our
18 lab is really excited about trying to come up
19 with ways, management approaches that farmers can
20 use that improve soil fertility, primarily
21 through cover crops, so specifically legume cover
22 crops.

1 So we worked and looked at biological
2 nitrogen fixation and rhizobia interactions with
3 those crops. Here in Minnesota we have a ton of
4 high tunnels. As you might imagine we're cold,
5 and high tunnels have allowed us to extend our
6 season in a pretty big way. So a lot of farmers
7 are putting them up and elsewhere in the country
8 we're finding that farmers who have high tunnels
9 in warmer --

10 We can't grow things in our high
11 tunnels in the winter by and large. But
12 elsewhere in the country, farmers are really
13 pushing those tunnels to the max. So they are
14 growing crop after crop after crop and after
15 about 15 years of having cost share dollars
16 building high tunnels, we've seen that the soils
17 are struggling. They're being impacted by
18 salinity, compaction. There are nutrient issues.

19 So we for the last four years have
20 been thinking about ways to sneak cover crops
21 into these high tunnels. In Minnesota, it was
22 pretty easy, because we found that they were

1 empty in the winter. They weren't in use for
2 crops.

3 So when I got here four years ago, I
4 said well, let's put cover crops in. I want to
5 put cover crops everywhere. That's kind of my
6 goal. So let's get legumes into these tunnels,
7 and we've been able to do that pretty
8 successfully, and the really nice thing about it
9 is that we've been able to do it using crops that
10 typically don't survive outside the tunnel in the
11 winter.

12 So it's too cold to get some species
13 to survive outside the tunnel, but the tunnel's
14 just a little bit warmer. So we can use that
15 time in the winter to really improve soils. So
16 we've found that by growing legumes over the
17 winter, we've been able to increase the amount of
18 nitrogen that farmers can basically produce on
19 their farm through nitrogen fixation.

20 So that improves the farmer's bottom
21 line by reducing off-farm fertilizer inputs, and
22 of course increases soil health through organic

1 matters. So we're still working on that. We
2 actually have multi-state OREI grant right now.
3 We're working on a north to south gradient,
4 looking at high tunnels from here down to
5 Kentucky, where we have collaborators along the
6 way, and we have replicated identical experiments
7 in all states to try to understand how these
8 different cover cropping systems might differ
9 based on where you are on that north-south
10 gradient. So it's been a really, really fun and
11 exciting project.

12 I also want to highlight a Minnesota
13 research example from economics. This is a
14 project that is helping farmers to better
15 understand price premiums of their organic farm,
16 organic crops and what they can bring in the
17 marketplace. So this is being conducted by a
18 faculty member who's in Applied Economics, and
19 that's Metin Cakir. He's in the Department of
20 Applied Economics at the U.

21 You know, the people who are at the
22 University of Minnesota, we call it the U. So

1 like that's our U. I know there are other U's,
2 but sometimes I forget that. I say "the U."
3 They said what's she, you know. So despite the
4 large and growing importance of organic fruits,
5 there's surprisingly little consensus on the
6 retail premiums that they can bring in the
7 marketplace.

8 So in particular, the state of
9 academic research on organic foods is hindered by
10 this lack of comprehensive micro level data on
11 organic marketing. So he's tackling that head-
12 on, and what he's doing is using a point of sale
13 scanner around the state to compare organically
14 and conventionally grown fresh fruits and
15 vegetables, to determine how changes in organic
16 price premiums might vary by over time, and how
17 they vary across locations as well.

18 So this project. It's -- we're just
19 in the middle of it right now. But the project
20 he's hoping will help farmers that are
21 transitioning to organic production, as well as
22 researchers who are working with organic food and

1 agriculture markets. It will help him by helping
2 them better understand how price premiums are
3 determined across the organic marketplace.

4 Finally, although many people when
5 they think about the University of Minnesota,
6 they think about the campus we have here in the
7 Twin Cities, and we do have many other campuses
8 that are around the state. One of them in
9 particular, many of them work in organics, but
10 one of them in particular is a real hotbed of
11 organic dairy research.

12 Again, the University of Minnesota is
13 well known for our 150 head of certified organic
14 dairy, and 650 acres of certified organic land
15 that is located in Morris, Minnesota. So that's
16 about three hours away from here, and it's been
17 around since about 2010. So it's been quite a
18 while now.

19 This program is known nationally as
20 the University of Minnesota Organic Dairy
21 Program, and it's directed by associate professor
22 of Animal Science Brad Heins. Brad is great. He

1 also sites on the task force, the organic task
2 force that brings together FDA with the
3 University of Minnesota and stakeholders around
4 Minnesota.

5 Brad is trying to solve the most
6 challenging aspects of organic dairy production,
7 to help farmers weather the storm, the economic
8 storm that they've face in recent years. In
9 particular, although Dr. Heins' program is really
10 widespread in its focus, he's very interested in
11 grazing research, building a more robust cow, and
12 his group also focuses on improving the
13 nutritional quality of milk and meat across his
14 many, many funded projects.

15 Harriet might know Brad's name,
16 because I think his students have now the MOSES
17 poster competition award, you know first or
18 second place for the last like five years. I
19 mean he's just a -- he's a real excellent mentor
20 for these students that are interested in organic
21 dairy.

22 So in closing, I wanted to highlight

1 Minnesota as an example of a university that is
2 trying to prepare both graduate and undergraduate
3 students with these skills that I feel are
4 really, really important to bring about positive
5 change in the world in coming years in organic
6 and sustainable agriculture.

7 There again, they're the ones that are
8 going to be making these changes. They're going
9 to be teaching our future students, they're going
10 to be farming. But many of them are not going to
11 be -- not all of them are going to be farmers.
12 So some will, but most of them will be working
13 with farmers. So it is really, really critical
14 that the people that are making the decisions are
15 knowledgeable.

16 So I want to encourage us to continue
17 to support programs that are trying to move
18 beyond organic production, and get these students
19 to think about their decision-making skills, hone
20 their critical thinking skills. We need leaders
21 who understand connections between food access
22 and food skills, between social science and soil

1 science.

2 Sometimes you might say I talk fast,
3 you know, I introduce myself. And I say oh, I'm
4 a soil scientist. You're a social scientist?
5 No, soil scientist. So sometimes those
6 differences get mired in the details, but they're
7 really important to connect. And there are many
8 multiple other disciplines that are really going
9 to make our organic systems strong and healthy
10 for tomorrow.

11 So I really would like to help us
12 think about that today while we're sitting here
13 about how you go here. How did you all end up
14 sitting at this table today? Where did your
15 background come from, and what was your
16 background that brought you here, and how can you
17 share that with students?

18 I'm really excited to be here. This
19 is my first meeting, so I'm really excited to see
20 how this works, and I look forward to meeting
21 many of you. Thank you very much.

22 (Applause.)

1 MR. CHAPMAN: Thank you. Thank you so
2 much, both to Commissioner Frederickson and Dr.
3 Grossman for your comments here today. I really
4 appreciate it. A really great way to start off
5 this meeting here in St. Paul, so thank you
6 again. Right now we'll move on to my report as
7 chair, and then proceed to the NOP's report as
8 well.

9 MR. CHAPMAN: This is my fourth report
10 as chair, so I will keep it brief, as I'm sure
11 you're all tired of hearing me mumble through
12 this by now. My last few meetings, I've asked
13 for patience as we've waited for the
14 administration's leadership to be seated, and I'm
15 happy to say that now we have a full USDA
16 leadership team in place.

17 At the last meeting, we heard from
18 Undersecretary Ibach, and since then we have had
19 both an AMS administrator and an NOP deputy
20 administrator appointed. While no surprise to
21 most people in this audience, I'd like to
22 recognize Dr. Jenny Tucker, who was recently

1 selected as the deputy administrator of the NOP.

2 I could spend probably too much time
3 right now praising the selection of Dr. Tucker to
4 head up the NOP. But I'd be remiss if I didn't
5 sing just a few of her laurels. Hired under
6 Miles-McEvoy in 2011 as associate deputy
7 administrator, you'd probably be surprised that
8 most of Miles' successes were probably done by
9 Dr. Tucker's work behind the scenes.

10 Dr. Tucker has a B.A. in Environmental
11 Science from Wesleyan University, an M.S. in
12 Management from Purdue University, and a Ph.D. in
13 Science and Technology Studies from Virginia
14 Tech. Over-achiever.

15 (Laughter.)

16 MR. CHAPMAN: So she knows -- so she's
17 an environmentalist, knows people in management
18 and technology as well to boot. I couldn't
19 really think of anyone more prepared to lead the
20 NOP during this current time.

21 I know from talking with NOP staff, as
22 well as members of the organic community that Dr.

1 Tucker commands a tremendous respect and trust,
2 and I personally look forward to her honest,
3 humble, straightforward leadership. Can I get a
4 round of applause for Jenny?

5 (Applause.)

6 MR. CHAPMAN: Lastly, as we get
7 started here today, I'd like to thank the Board,
8 who has again volunteered and spent numerous
9 hours discussing, reading, debating, and
10 listening to comment in preparation for this
11 meeting. That time is extremely valuable, and I
12 appreciate everyone's dedication.

13 With that, we will move on to the
14 Secretary's report. Scott.

15 MR. RICE: Thanks Tom.

16 (Off microphone comments.)

17 MR. RICE: Okay, I'll try this.

18 MR. CHAPMAN: I think it's feedback
19 from the beard.

20 (Laughter.)

21 MR. RICE: I'm a beard man. Mr.
22 Chairman, the summary notes of the April 2018 bio

1 and meeting in Tucson have been distributed to
2 Board members. Are there any corrections or
3 comments?

4 (No response.)

5 MR. CHAPMAN: Seeing none -- seeing
6 none, thank you Scott. We will accept the
7 Secretary's report without objection by
8 consensus, and seeing no objections, the report
9 is accepted. Up next, I will hand the meeting
10 over to Dr. Tucker for the NOP report.

11 DR. TUCKER: Okay, good morning
12 everybody.

13 VOICES: Good morning.

14 DR. TUCKER: Okay. I'm going to do a
15 quick test here. Ooh, it works. Yes, okay.
16 Okay. Welcome to St. Paul, Minnesota. It is so
17 great to be here and to see all of you out here.
18 I always start presentations by celebrating our
19 certified organic farms and businesses in
20 whatever city or state we are in.

21 So there are 966 certified operations
22 in Minnesota. Raise your hand if you are one of

1 them.

2 (Show of hands.)

3 DR. TUCKER: All right. We've got a
4 number of folks out there. So thank you so much
5 for being here.

6 (Appause.)

7 DR. TUCKER: And you can of course
8 learn more about all of these operations in the
9 Organic Integrity Database. So I'd like to
10 actually show you a different view of the
11 certified operations here in Minnesota by
12 specifically focusing on a particular county that
13 we're in right now, which is Ramsey County.

14 So this is a different view of data
15 from the Organic Integrity Database. It is an
16 internal mapping system that allows us to see
17 operations at the county level. So we can hone
18 in on specific cities and on specific counties.
19 We've invested in these data visualization tools
20 for a lot of reasons.

21 First, it helps us with audit
22 planning. So when we do witness audits or review

1 audits, it's good to know where different
2 operations are so we can plan audits efficiently
3 and effectively. It also helps us with county-
4 level and state-level reporting of acreage.

5 There's a lot of conversations about
6 data, data quality and acreage reporting, and so
7 having county level views and the ability to list
8 data within county is going to be very helpful as
9 we continue to make our reporting more robust.

10 It's also helpful to view operations at a county
11 level when we are approached by state officials
12 who have questions related to emergency pest
13 management programs.

14 So being able to see if there are
15 actually any operations in a county that might be
16 impacted by a state program just gives us a lot
17 more data to be able to make decisions with. So
18 the map helps us assess possible impacts of state
19 treatment programs.

20 As certifiers report more acreage
21 data, and we strongly encourage them to do so,
22 and as they adopt our product taxonomy and the

1 Organic Integrity Database with more accurate
2 reporting against product categories and item
3 lists, we will be able to provide more data
4 output, tables and graphics to provide the
5 community with the data that you need for good
6 research and decision-making.

7 So data quality continues to be a
8 need. When we launched the mapping of function,
9 we learned that there was about a 75 percent
10 match with census and postal service data.

11 So there's still a lot of work to do
12 on data quality, and so we're going to continue
13 to reach out to our certifiers to up the data
14 game. So if your information about your
15 operation is not correct in the Organic Integrity
16 Database, we strongly encourage you to contact
17 your certifier, let your certifier know that
18 that's important to you and why.

19 So I like to also start presentations
20 with reviewing USDA's principles for organic. So
21 these were published in the 2018 Farm Bill, a
22 legislative principles document. The goals are

1 protect the integrity of the USDA organic
2 certified seal, and to deliver efficient and
3 effective oversight of organic production
4 practices to ensure organic products meet
5 consistent standards.

6 Let's take a look at our four key
7 priorities for fiscal year 2019. So the
8 government fiscal year starts at the beginning of
9 October. So we are near the very beginning of
10 our fiscal year, and so I'd like to walk through
11 the four priorities, and then I'm going to show
12 you what we've done in these different areas over
13 the course of the last few months.

14 The first three areas here are strong
15 organic control systems, farm to market
16 traceability, and robust enforcement were all
17 part of the enforcement action plan that we
18 published in May. So we're continuing these
19 priorities into 2019. The outcomes of those will
20 be trusted people, process, and rules, worldwide
21 supply chain integrity and a level playing field
22 for all.

1 Our fourth goal for FY '19 is to
2 continue to support the standards and collaborate
3 with the community, and the outcome of that will
4 be ongoing engagement and transparency. So I'm
5 going to walk through each of these four areas,
6 highlighting some of the work that we've done
7 over the past several months.

8 So in the area of strong organic
9 control systems, which lead to trusted people,
10 processes, and rules, we have released new policy
11 memos and letters related to fumigation and
12 prohibited commodities. We've really upped our
13 outreach on fumigation, so that the trade has a
14 better sense of how to consider products crossing
15 the border, and doing research to make sure that
16 products that have been fumigated are not
17 represented as organic.

18 As part of this, we're collaborating
19 with APHIS, a partner agency, for better data.
20 Now last time I presented to the Board, I
21 presented that there was a very, very high number
22 of fumigation incidences. In the meantime, we've

1 worked very closely with APHIS to better
2 understand the data, and that's led to much
3 better data quality related to fumigation.

4 So it actually turns out that the hits
5 are actually much, much lower than we had
6 thought, which is very, very positive and very
7 good. It also allows us to do much more specific
8 follow-up and investigations on any particular
9 hits that we get. So that's been a piece of
10 positive news of the last several months.

11 We have been developing new models for
12 risk-based oversight using diverse data sources.
13 There are a lot of international agencies that do
14 very good work on the risk of fraud. We're also
15 using data from the Organic Integrity Database to
16 help us identify points of risk in different
17 parts of the world. We are continuing to conduct
18 auditor -- audits of certifiers, both satellite
19 offices and headquarters worldwide.

20 Those audits have resulted in some
21 enforcement action. We recently negotiated a
22 consent order that led to the suspension of one

1 of our international certifiers. So those audits
2 are a very important part of our enforcement
3 mission. And we are advancing the enforcement
4 role and learning management systems. I'm going
5 to talk a little bit about those in particular.

6 So here is the list of items that are
7 being considered for the strengthening of organic
8 enforcement rule-making, and I have been
9 encouraged not to read the list to you.

10 (Laughter.)

11 DR. TUCKER: So I'm not reading the
12 list. But it's there for you to read. So here's
13 -- it's a snapshot of a number of different areas
14 being considered. Many of these were covered in
15 a webinar we did in July, and many of these come
16 from NOSB recommendations.

17 So sometimes it can take time to
18 respond to recommendations, but we believe that
19 this rule will cover a lot of areas that the
20 Board has worked on, and has provided us feedback
21 about. If you have feedback in these areas, we
22 are accepting a communication at our guidance

1 box.

2 That's nop.guidance@ams.usda.gov. We
3 have received some best practice documents from
4 different organizations --- a lot of folks who
5 spend a lot of time thinking about these topics.
6 So that input is very helpful.

7 Let me talk a little bit about the
8 virtual town hall that we had in July. This is
9 just a snapshot of the different topic areas in
10 order of the number of chats. And so not
11 validated research by any stretch, but it does
12 give a sense of how many -- how much energy there
13 was around different topics.

14 So there were about 400 folks who
15 attended the webinar, and somebody did the math,
16 I love this. There were approximately 14 chats
17 were minute, and the top three topics were
18 excluded operations, import certificate
19 traceability, and standardization of inspector
20 qualifications. The Board's being doing a lot of
21 work on inspector qualifications recently, and
22 has also advanced recommendations on exclusions.

1 So very helpful work. We are
2 anticipating a proposed rule in the spring of
3 2019 that will be announced in the Organic
4 Insider. The process from there will be there
5 will be there will be a formal public comment
6 period like there are with all rules, and then
7 the comments from the proposed rule will be
8 considered in a final rule.

9 So next, I'd like to show you sort of
10 an initial front page of the Organic Integrity
11 Learning Center. So this is -- I've been calling
12 it the Learning Management System, LMS for short.
13 We've officially named it the Organic Integrity
14 Learning Center.

15 So this center is going to be designed
16 for certifiers and for inspectors, to really up
17 the game on continuing education and training, to
18 make sure that inspectors and certifiers have the
19 right skill at the right time for the right
20 operation.

21 And so the center will provide online
22 training to support professional development and

1 continuing education. We're really focusing on
2 certifiers, inspectors, and reviewers to start,
3 as well as professionals that are serving in
4 compliance and enforcement roles. So there are
5 times where certifiers need to conduct
6 investigations, and so we're going to include
7 training to improve their ability to do that, and
8 to really help the folks who are really boots on
9 the ground every single day out there on organic
10 farms.

11 This project directly supports our
12 goals of fair and consistent certification and
13 effective, fair enforcement. So if you would
14 like to learn more about this other program and
15 provide your feedback, we are going to have a
16 virtual town hall on November 15th, where we're
17 going to give sort of a test drive through the
18 Learning Management System.

19 You'll be able to ask questions and
20 provide your feedback about course topics. So
21 again, that will be November 15th from 1:00 to
22 2:00 Eastern. We're going to post more details

1 later today in the Organic Insider. So I hope
2 you'll be able to join us.

3 Let's move on to the second area, farm
4 to market traceability. So our first big success
5 in this area is that we published a report, it's
6 on the website on collaboration opportunities and
7 technology needs related to supply chain
8 integrity and import integrity.

9 This was our formal response to the
10 2017 OIG report. I committed at the last NOSB
11 meeting that we would complete all of our AMS
12 response items to the Office of Inspector
13 General, and we did so, and this report was a big
14 part of that.

15 That has led to lot of follow-up
16 conversations with the OIG, with CBP, Customs and
17 Border Protection, and APHIS as we advance those
18 specific projects. We have worked closely with
19 Customs and Border Protection to scope our
20 organic message set projects.

21 If you remember from our last meeting,
22 the organic message set is what makes the organic

1 import certificate an electronic part of CBP's
2 import system. We've also initiated visioning
3 for a global organic oversight and traceability
4 system. So I'm going to talk a little bit about
5 that.

6 So part of our report this summer
7 included a technology needs assessment. And so
8 here's a look at our technology goals for the
9 months ahead. We are interested in facilitating
10 full supply chain traceability, allowing
11 government entities to access, approve, and
12 verify the validity of certificates and
13 transactions.

14 Implementing electronically based and
15 secure oversight control systems. We need to
16 have trusted users and secure data exchange. So
17 that's an overview of our leading goals related
18 to technology. And so technology is an area that
19 I tend to think about and focus a lot on, and so
20 I want to show you a couple of pictures that
21 simply have started a conversation on what an
22 international potential system could look like.

1 So block chain is a technology that's
2 come up in the last couple of NOSB meetings. May
3 or may not be a final technology for where we're
4 headed here, but it is a framework for
5 consideration. And so here's just one vision of
6 how a technology solution could play out. You
7 can have farms or initial consolidation points
8 provide both data and product into the organic
9 system.

10 The data and products would then be
11 exchanged and traced across handlers and brokers.
12 Organic certifiers would be able to confirm
13 transaction authenticity with oversight from the
14 National Organic Program, and then an import
15 certificate would transmit the data into CBP's
16 system and then into the United States.

17 So this is one vision. This was a
18 vision that we first drafted out on a chart paper
19 in spring 2018. So sort of our fix -- a first
20 picture of folks who worked with me on the
21 Organic Integrity Database know that that system
22 was basically built out of a flip chart in my

1 office. So that one piece of paper visioning, I
2 tend to enjoy doing that work.

3 So as we continue to extend our
4 thinking on this, we have another picture. And
5 so this may in fact be a more accurate picture of
6 what this ultimately could look like. So a
7 second version of the vision would be really more
8 about connected data strings, where a lot of
9 different people or a lot of organizations have
10 their own systems, and those systems are able to
11 exchange data in a unified way.

12 And so in this model, we might have
13 organic oversight block chain or other system
14 that would be fed by and would feed other chains
15 and other systems. So here you could have a
16 supply chain block chain. We have some supply
17 chain leaders out there who are considering
18 building their own block chains. You might have
19 a government that builds a system.

20 So for example Italy has invested in
21 a country-wide system, and so data could be
22 exported from these different systems onto a

1 stream of data that is then transmitted across
2 the oversight system. Again, one of those nodes
3 may be Customs and Border Protection as that data
4 becomes import ready for our import systems with
5 CBP.

6 So lots of different ways of looking
7 at this problem. We are just starting this
8 conversation, and so I am now approached
9 periodically by folks who are considering
10 building block chains or exploring that idea for
11 their own supply chain or their own sort of part
12 of the organic universe. So I welcome those
13 conversations so we really have a sense of all
14 the diversity that's going on out there.

15 Third area, robust enforcement, which
16 will create a level playing field for all. So
17 first, I want to highlight our Dairy Compliance
18 Project. Now last time we were with you, we
19 started talking about this project. We had
20 called it a pasture surveillance project. Based
21 on everything we've learned to date, we have
22 reoriented. It is now a Dairy Compliance

1 Project.

2 There are problems out there, and we
3 are investigating and we are enforcing. We are
4 doing unannounced inspections as part of
5 investigations. We are also doing unannounced
6 inspections as part of surveillance activities.
7 This is one of our top priorities in the program,
8 and so based on everything we've learned to date,
9 we are going to continue that project also into
10 2019.

11 So this is going to be an ongoing
12 series of investigations and compliance oversight
13 effort. We have also overhauled our complaint
14 intake process. We had started this process at
15 the last NOSB meeting. We have continued it, so
16 that we are able to classify complaints coming in
17 more rapidly, and to respond to questions that
18 really aren't complaints but are really
19 questions.

20 Where we get a complaint in that
21 doesn't really have the evidence that would be
22 needed to support an investigation, we provide

1 immediate feedback, so folks have a better sense
2 of what is needed. I'm going to talk more about
3 complaints in a bit here.

4 We've also awarded a contract to
5 expand our investigative capacity by
6 approximately five people. It is still the case
7 that more than half of the complaints that we get
8 in are actually uncertified operations. So
9 having some supplemental capacity to investigate
10 complaints against uncertified operations will
11 allow us to take action faster in those
12 particular scenarios.

13 We continue to work with APHIS and CBP
14 to block non-compliant imports. We are building
15 a new complaint management system which is more
16 consistent with what other federal agencies have
17 with an enforcement mission, and we are
18 supporting investigations by our federal
19 partners.

20 So examples of federal partners are
21 Office of Inspector General and Department of
22 Justice. So that takes me to some comments.

1 We've gotten some questions about recent news
2 reports related to domestic organic fraud. And
3 so we can't comment on the details of open
4 investigations or pending litigation.

5 What we can say is that over the past
6 year, we have done a comprehensive review of our
7 pending case load, and we are confident that any
8 open case with verified violations is actively
9 being worked on by an NOP specialist, or has been
10 referred to another partner such as other federal
11 agencies or other governments for investigation.

12 Some of these cases involve complex
13 supply chains and players, and many players may
14 become involved, both in the problem itself but
15 also in the investigation. So building strong
16 cases with deep evidence and providing due
17 process to all the parties is a vital part of any
18 investigative process. This takes time.

19 I am fully confident in our compliance
20 and enforcement team. We've added staff
21 resources, improved intake, added new technology
22 tools to assist investigations, and have built

1 strong bridges with other members of the federal
2 enforcement family.

3 We all know that a few bad actors can
4 undermine the work and livelihood of thousands of
5 good organic farmers who rely on consumer
6 confidence in the organic seal.

7 We are advancing strong cases quickly,
8 and referring cases to other investigative teams
9 where appropriate. It is important to remember
10 that fraudulent organic food sales are the
11 exception, not the rule. Working together with
12 farmers, ranchers, certifiers, and other
13 stakeholders like all of you here, we will all
14 together ensure the organic seal remains the gold
15 standard.

16 Now I would like to turn to imports,
17 and so I think one of the good ways of showing
18 what we've done in this area is to review a case
19 study. So we're going to review a case study of
20 corn imported from Serbia. So in August, there
21 was a blog post that highlighted some trade data
22 that showed organic corn was being imported from

1 Serbia.

2 This was the first time that a blogger
3 had seen Serbia as a producer of organic corn,
4 and there was no Organic Integrity Database
5 listing for a Serbian corn producer. So as a
6 result, many people started speculating that the
7 imports might be fraudulent, and we heard from
8 several stakeholders about this.

9 Within two weeks, the NOP took quick
10 action to obtain and analyze data, and we
11 confirmed organic integrity. Here's how we did
12 it. First, we used the ACE database, that CBP
13 sourced for all trade and import data, to get
14 information on the supply chain. Then we
15 contacted the North American importer for further
16 information. The importer immediately provided
17 an organic certificate for the Serbian source.

18 Second, we contacted the certifier who
19 is listed on the certificate. This allowed us to
20 verify the certificate and get more information
21 about the operation's acreage and production
22 capacity. The certifier quickly cooperated and

1 confirmed that the Serbian producer had enough
2 land to produce the amount of corn that they
3 exported.

4 Finally, we examined available market
5 analyses from the USDA's Foreign Agriculture
6 Service. We found that the Serbian government
7 has been investing in organic transition,
8 providing a fast-growing supply of organic
9 products. We also learned that they had a bumper
10 corn crop in 2017 thanks to good weather
11 conditions.

12 We are keeping in touch with our local
13 FAS contacts to monitor the situation moving
14 forward. The NOP has developed this sort of
15 rapid response model when we receive questions
16 about imports.

17 When we have access to data, we're
18 able to act quickly to resolve doubts or to
19 identify new areas for surveillance. The trade
20 data showed that Serbian organic imports before
21 there was a listing in Integrity for a Serbian
22 corn grower. This understandably raised

1 concerns.

2 Our priority is ensuring organic
3 integrity worldwide. There are both good and bad
4 actors around the world. So we're developing the
5 risk-based systems that will detect the
6 differences. Two key take-homers here. First,
7 another example of why accurate and timely data
8 in the Organic Integrity Database is so critical.

9 A lot of certifiers are reporting data
10 more frequently and we really need the trade's
11 help to emphasize the importance of up-to-date
12 data across your supply chain with your
13 certifiers. We need better data to ensure a
14 level playing field to protect our borders and
15 facilitate fair trade.

16 Second, in this case the certifier was
17 able to substantiate that the farm could produce
18 the yield seen in the export. Not all certifiers
19 are generating verifiable yield data. We did a
20 recent webinar with certifiers to review ways to
21 do this. This is part of our ongoing work, to
22 ensure fair and consistent certification around

1 the world.

2 So let's take a look at our import
3 investigation strategy from here. We are
4 pursuing cases with sufficient evidence,
5 continuing to work specific cases with CBP and
6 APHIS. We're focusing on oversight in the Black
7 Sea region on certifiers, and then also on
8 surrendered operations who are now seeking re-
9 certification.

10 So we're really keeping an eye on
11 those cases, and particularly in reconfirming
12 that yields reported are possible. We are
13 increasing our emphasis in other geographic areas
14 based on complaints and our risk-based model, and
15 we're going to continue to increase certifier
16 training on how to calculate yield estimates and
17 on the non-compliance process evidence and
18 appeals.

19 I've showed this slide in the past few
20 meetings, and I'm going to continue to show it,
21 because it is core to all enforcement. The
22 Organic Foods Production Act, regulations and

1 legally defensible evidence. Enforcement depends
2 on all three. So I get asked a fair amount well,
3 what does legally defensible evidence look like?
4 So let's take a look at that.

5 So here are examples of evidence that
6 are often gathered by NOP and by certifiers. So
7 we're not expecting complainants to have all of
8 this information when you submit a complaint.
9 I'm going to get to those elements in just a
10 second. But here are some of the types of
11 evidence that we look for when we're conducting
12 investigations, and that certifiers need to be
13 looking for when they conduct theirs.

14 This is not an exhaustive list, nor is
15 it in any kind of specific order. But it does
16 give a sense of the kind of documentation and
17 evidence that best supports the investigations as
18 they unfold. Now I'm going to turn to how you
19 can help and talk more about complaint submittals
20 and what can constitute an effective complaint.

21 So we're going to focus on who, what,
22 when and where. So who, we need brand name,

1 operation name, manufacturer, U.S. importer, and
2 certifier. Any combination of those that you
3 have, as well as any information you have about
4 the supply chain.

5 The what includes product packaging
6 and the label, product lot numbers, photographs,
7 invoices, bills of lading, certificates. You
8 need to check the scope for alignment with the
9 complaint. So for example, we had an email, it's
10 a great sort of case study, an email that
11 included a handling certificate and the email
12 said well, I'm not sure that the crop was
13 actually grown on certified land.

14 So there was concern about the
15 validity of the crop, that the crop was certified
16 as organic. Well, it was a handling certificate,
17 and so to really verify the crop, we need a crop
18 certificate. So take a look at your certificates
19 when you're looking at a complaint, to make sure
20 the certificate actually aligns with the scope
21 that you are looking at and concerned about.

22 It also is very helpful to have a

1 specific regulatory violation. What part of the
2 rule do you believe is being violated, and how
3 does your evidence show that it is being
4 violated? Finally, when and where. So provide
5 the details of when you observe the alleged
6 violation, date and times, the location it
7 occurred.

8 So for example websites or specific
9 store, and if it is in the case of an import a
10 specific ship or port if known. That's how we
11 were able to work with the Serbian bit. We had
12 country information about a specific time and
13 place.

14 So complaints are an important tool
15 for maintaining organic integrity, and the U.S.
16 government has a unique ability to enforce.
17 Buyers, in turn, have a unique ability to see
18 what's happening on the ground. We encourage all
19 organic buyers to do research on their supply
20 chains. If you're concerned about the integrity
21 of the product you're getting from a handler or
22 broker, ask for the certificate for the original

1 product.

2 If they're unwilling to provide supply
3 chain information, that's important data for you
4 to consider. Traceability is core to organic
5 integrity. Be sure before you buy. Preventing
6 fraud takes all of us.

7 Moving to the fourth area, supporting
8 the standards, collaborating with the community.
9 This will lead to transparency and engagement.
10 I'm going to touch on some very special topics
11 here, first starting with National List rule-
12 making.

13 We have new National List rules. They
14 are in clearance. Our goal is to move ahead
15 quickly with rule-making once we have NOSB
16 recommendations. We expect a final rule
17 addressing multiple substances shortly, and other
18 rules should quickly follow. We'll also continue
19 to support technical reports for the National
20 Organic Standards Board.

21 In FY 2018, we invested \$250,000 on
22 technical reports. These investments are not

1 impacted by the expiration of the Farm Bill.
2 I've been asked that question, so I wanted to
3 share that. We also invest a lot of time on
4 material inquiries and conflicts.

5 There are times when certifiers make
6 decisions on materials, and those decisions
7 conflict. In those cases, we analyze the
8 disagreement and determine next steps. So
9 consistency and material determinations is a
10 critical element of fair and consistent
11 certification, and it supports organic farmer
12 needs.

13 So I'd like to cover a very specific
14 topic that's generated a lot of interest for this
15 particular meeting, and that is paper pots. So
16 paper pots is an example where there was a
17 material conflict. Some certifiers approved it,
18 and others did not. Those that approved the
19 paper pots likened them to regular pots used in
20 production, or saw the paper pots as similar to
21 the current listing for newspaper and recycled
22 paper. They saw it as being agroenvironmentally

1 sound, and approved them.

2 Other certifiers did not allow them.
3 They are an input into the soil, they are not
4 made of newspaper or recycled paper, and they
5 have an adhesive that is believed to be
6 synthetic. The product, and as far as we know
7 the adhesive, is not on the National List.

8 This conflict was raised to the NOP,
9 and we agreed with the certifiers that did not
10 allow the paper pots. Paper pots are
11 fundamentally different from any paper allowances
12 on the National List. They are not made of
13 recycled -- not made of newspaper or recycled
14 paper.

15 They're not used as mulches or compost
16 feed stocks, which are the only allowances of
17 paper in crop production. Because this came out
18 of a certifier conflict, in February 2018 NOP
19 notified certifiers that producers using them
20 could continue to do so for the remainder of the
21 2018 growing season. Then, that use needed to
22 stop.

1 We provided this grace period because
2 of the certifier conflict. Paper pots have since
3 been petitioned to be listed on the National List
4 as an allowed synthetic production aid for crops.
5 The Board's considering that listing now, with a
6 discussion document at this meeting.

7 If the Board recommends paper pots,
8 the USDA will consider that recommendation. If
9 USDA agrees with the Board's recommendation that
10 will involve rule-making, including providing the
11 public with an opportunity to comment. We have
12 been asked to extend the allowance of paper pots
13 while the Board does its work.

14 We've put a lot of thought into this,
15 and we've decided not to allow that. First, we
16 must be fair to the many farmers who have been
17 told that paper pots cannot be used. Second,
18 allowing continued use of a material because
19 certifiers were wrong in allowing its use in the
20 first place sets a bad precedent.

21 Synthetic materials are not allowed in
22 crop production unless they're on the National

1 List. Paper pots are currently not on the list.
2 We look forward to hearing the Board's
3 deliberation on this topic.

4 Finally, at the last NOSB meeting
5 there was interest in increasing our outreach to
6 the American Indian tribal community. Last
7 month, the Organic Program participated in an AMS
8 consultation with a group of tribe
9 representatives. During the session, we shared
10 our strategy to strengthen organic integrity.

11 We provided background on the National
12 Organic Standards Board and opportunities for the
13 Native American and Alaska Native community to
14 engage with the NOSB and NOP. So many thanks to
15 Paul Lewis for advancing that consultation.

16 Thank you.

17 Okay. I am going to switch gears now
18 into our peer review, which we have been
19 reporting on annually at the NOSB meeting.
20 Quality management is an important part of what
21 we do to ensure the integrity of our
22 accreditation system. So last fall I reported on

1 our 2017 peer review, and I am now ready to
2 report on our 2018 peer review.

3 We worked with ANSI again this year.
4 We changed our approach. So we took a bit of a
5 different tack this year. The reviews have over
6 time gotten very, very detailed, with a lot of
7 focus on records and very specific aspects of
8 checklists. This round, we asked ANSI to take a
9 more systems-level view of our program, and to
10 focus on the areas where the challenges are most
11 clear, such as imports and dairy oversight.

12 We also asked them to view our system
13 through a risk-based lens, which is also a key
14 emphasis of the newest version of 17011 -- that's
15 the ISO standard. And so there are two slides
16 here that have opportunities for improvement and
17 recommendations.

18 Again, it's a very different list than
19 what we had last year. A lot of the observations
20 last year again were focused very specifically on
21 documents and checklists, where this time again
22 we asked for a very systemic view, which is

1 really helpful in charting and has really
2 informed our goals for FY '19.

3 So one of our big problems right now
4 is we don't actually have a dedicated quality
5 manager. That position has been vacant for a
6 bit. We have gotten permission to hire one. So
7 I have approval authority to hire a quality
8 manager, and we really need that to maintain our
9 systems effectively. We will be developing a
10 document that summarizes our relationships with
11 other organizations.

12 While there are many mechanisms that
13 we have to avoid conflicts of interest, they're
14 not all written down in one place, which is
15 something that the ISO standard recommends. So
16 that was -- is an opportunity for improvement.
17 We do not have sufficient auditors and we don't
18 have sufficient personnel to handle complaints
19 and enforcement actions.

20 Now we did receive new funding in the
21 middle of the fiscal year, when Congress passed
22 their '18 budget. Many thanks to all of those

1 who helped advocate for that increased funding.
2 That is helping with our ability to hire and do
3 staff augmentation to meet our mission.

4 Internationally, we've learned that
5 the procedures for residue testing aren't real
6 well clearly understood by international
7 certifiers and satellite offices, and we aren't
8 auditing satellite offices as much as we would
9 like to. So these are observations confirmed by
10 ANSI. So having external organizations help you
11 see these things that, you know, having them on
12 paper is very helpful in planning.

13 ANSI also recommended that we
14 establish stronger quantitative objectives and
15 performance indicators to effectively monitor our
16 goals. We do, this is repeated from last year,
17 we do have challenges with our own internal
18 document controls. This is a side effect of not
19 having a quality manager in place, so I think
20 that will be a situation that's remedied by that
21 hire.

22 Some comments on our certificate and

1 our terms of accreditation. The need for
2 additional training was emphasized. We've been
3 emphasizing certifier and inspector training, but
4 we also need to continue to train our own staff
5 in the area of risk assessment and investigative
6 methods.

7 And so finally ANSI confirmed what I
8 think we know, that certifier audit trail
9 exercises are not always providing adequate
10 detail to verify and fully document full supply
11 chains.

12 So here are the initial actions that
13 we're taking. A lot of our '19 goals were
14 designed to address these concerns. We have been
15 approved to hire a quality manager. We've been
16 approved to hire additional auditors. We are
17 launching the Learning Management System. It
18 will include import oversight topics as well as
19 residue sampling testing, analysis topics, and
20 other issues.

21 We are developing risk-based oversight
22 models and continuing to refine audit planning

1 based on the available resources that we have.

2 I am going to close by summarizing our
3 FY '19 goals across all four of these areas. So
4 FY '19 goals related to strong organic control
5 systems. We're going to publish the proposed
6 rule that we discussed. We have already launched
7 a pilot version of our Learning Management
8 System. We now need to get training into it for
9 organic certifiers and inspectors.

10 We are expecting that to be fielded by
11 January 2018 (sic) in advanced of our certifier
12 training in February. We're going to continue to
13 conduct face-to-face training sessions with
14 certifiers. We're developing a risk-based
15 certifier oversight model, and we're maintaining
16 and negotiating organic equivalency emphasizing
17 oversight and enforcement.

18 For FY '19 goals related to farm to
19 market traceability, we'll be contracting with
20 Customs and Border Protection to program the
21 organic import certificate into the automated
22 commercial environment. We'll be

1 institutionalizing business processes related to
2 fumigation, data analysis, investigations and
3 notifications.

4 Developing a concept of operations and
5 architecture for the traceability system that I
6 showed you a couple of pictures of, and we're
7 going to be completing a memorandum of agreement
8 to access CBP and ACE data across all harmonized
9 trade codes. So those are our activities related
10 to farm to market traceability.

11 Our goals related to robust
12 enforcement, we will be launching our new
13 compliance and enforcement database system to get
14 us in line with other enforcement agencies. It
15 has been our consistent goal to resolve 90
16 percent of appeals within 180 days, and for the
17 past couple of years, we've really hit that mark.
18 In FY '19, we hope to resolve 80 percent of the
19 complaint cases opened in FY 2017 and earlier,
20 and by the end of FY '19 we want to be trending
21 towards resolving 75 percent of new complaints
22 within 180 days.

1 Again, investigations can take time,
2 particularly when they involve other federal
3 partners. And so we plan to resolve most
4 complaints much faster. There are complaints
5 that will remain open for longer periods of time,
6 where a more in-depth investigation is justified
7 and warranted.

8 And then finally we'll complete the
9 2018 Dairy Compliance Project with associated
10 adverse actions and increased training with
11 certifiers, and we'll initiate our 2019 Dairy
12 Compliance Project. For FY '19 goals and
13 standards and collaboration, we're
14 institutionalizing our streamlining actions to
15 reduce National List rule-making time frames.

16 Again, the Standards Division has done
17 a really nice job of re-envisioning how National
18 List rules can be published faster, getting new
19 tools to farmers and to processors as needed. We
20 will be posting a call for nominations in 2019
21 for Board seats that will be opening in 2020.
22 From an NOP staffing perspective, we have a

1 number of vacancies we've been approved to fill.

2 I am recruiting to replace the
3 associate deputy administrator position that was
4 vacated when I took on this new role. We are
5 currently interviewing for additional
6 accreditation managers. We have approval to hire
7 a quality manager, a new trade systems lead,
8 auditors, and an additional compliance and
9 enforcement specialist.

10 We will also be hosting two NOSB
11 meetings in FY '19, and in addition to those
12 face-to-face meetings and our certifier training,
13 we are also dedicated to continuing our online
14 public engagement or virtual town halls. In the
15 past few months, we've conducted two webinar
16 training events for certifiers.

17 In May, we posted a public webinar on
18 technology initiatives. In July, we hosted the
19 Strengthening Organic Rule-making webinar and in
20 November, again we're going to host the webinar
21 on the Learning Management System. So these are
22 important ways for us to share our work with you

1 and to get your feedback and input.

2 And so that is our look ahead at FY
3 '19. I want to thank you all for being here
4 today and for listening to this presentation.
5 I'm going to now turn it back to Tom to
6 facilitate questions from the Board.

7 MR. CHAPMAN: Thank you very much
8 Jenny for that detailed and thorough public
9 update. I'm going to open up to questions from
10 the Board. Emily.

11 MS. OAKLEY: Thank you, Jenny. I
12 wanted to talk to you not surprisingly about
13 paper pots. So one of my big objectives, small
14 scale farmers and especially direct to consumer
15 growers getting and staying certified organic.
16 I'm concerned that this decision might lead to
17 loss of smaller scale growers and their dropping
18 of certification.

19 So I wanted to ask you one, about your
20 concerns about that, and then two, I'm also
21 equally interested in seeing growers engage in
22 the NOSB process, and I was really heartened to

1 see that we had approximately 80 comments from
2 growers specifically about paper pots, which in
3 93 years is a really large number of growers
4 engaging on a topic.

5 Since you stated that we probably
6 won't be able to get an extension of the 2018
7 deadline that we're going to keep working on
8 trying to change your mind if possible, what can
9 those stakeholders do to try to request an
10 extension that might lead to that result? Thank
11 you.

12 DR. TUCKER: Thank you. I appreciate
13 the question and again, this is not a decision
14 that is made lightly. Our first fidelity must be
15 to the USDA organic regulations and to the
16 National List, and that protecting the integrity
17 of the organic seal goes back to the Organic Food
18 Production Act and the regulations as published.

19 And so those decisions are never easy,
20 but we have to have fidelity to the regulations.
21 I only wish that the product had been petitioned
22 earlier, so the Board could have considered and

1 had this conversation much earlier and used. We
2 believe the certifiers that decided not to allow
3 this were correct, and so we have to uphold the
4 decision-making of certifiers that weighed this
5 against the list correctly.

6 So I think certainly hearing from
7 stakeholders both through this meeting and
8 through any follow-up communication such as
9 letters sort of formalizing that. I think we
10 haven't gotten a lot of formal letters at USDA
11 about this. So I have been asking sort of weekly
12 who is writing about this, and we haven't gotten
13 a lot of communication on this until this
14 meeting.

15 And so I think many out in the
16 audience have heard my little talk about the
17 importance of letter writing and that letters
18 matter. So I would give that advice.

19 MS. OAKLEY: Could I follow up with
20 that? So when if people were to write to the
21 USDA, should they be writing to NOP, should they
22 be writing to the Secretary of Agriculture? Do

1 you have some suggestions for where they could
2 direct that communication most effectively?

3 DR. TUCKER: So letters that are sent,
4 and so this is just a little bit of sort of
5 education on how the USDA correspondence system
6 works. There are entire manuals on
7 correspondence. So in the USDA it's called
8 controlled correspondence. Anything that is sent
9 to the Secretary or the Undersecretary gets
10 entered into a magic system and assigned a
11 number, and so -- and responses are tracked.

12 And in fact my performance is assessed
13 based on my ability to get responses done and in
14 the system. So I think writing to the
15 Undersecretary and the Secretary level helps
16 express your priorities and why they're important
17 to you, and what potential economic impacts might
18 be experienced in specific cases.

19 So you can always write to me and in
20 fact if you write the to the Secretary and
21 Undersecretary, we'd always appreciate your
22 cc'ing me so I know it's coming. It's just

1 helpful to have a copy of that, of that
2 correspondence.

3 MS. OAKLEY: Thank you for letting me
4 ask one more. I just want to make a comment that
5 I think it is a big ask to get growers involved
6 in the process. So I don't want them to feel
7 disillusioned that they made comments to the
8 NOSB, and now they're being asked to make
9 comments to another level.

10 But I think if stakeholders in the
11 room can hear this dialogue and communicate that
12 and try to encourage participation among farmers,
13 and not have them feel disheartened, I think that
14 would be a really effective tool for this
15 dialogue. So thanks.

16 DR. TUCKER: Yeah. I do think that
17 part of ongoing engagement with the government is
18 remembering that you can't just do it once,
19 right. So public comments are important, letters
20 are important, phone calls are important, visits
21 are important. So there are stakeholders who
22 communicate in a lot of different ways. There

1 are other stakeholders who, you know, make one
2 comment or send a letter and that's it.

3 I know folks are doing their normal
4 day jobs, and that is their number one mission,
5 and hearing from multiple folks in different
6 ways. This is where I think if you're a member
7 of some kind of coalition or group that can
8 represent the perspectives of multiple farmers,
9 one of the letter -- the letter that we've gotten
10 on paper pots so far has been from a certifier
11 advocating for its operations. So that's another
12 important vehicle.

13 MR. CHAPMAN: Ashley.

14 MS. SWAFFAR: Thanks. Jenny, I have
15 three questions. I'll ask them one at a time.
16 So this summer the NOSB Executive Committee asked
17 for a work agenda request to address antibiotics
18 in pre-second day of life day-old chicks. Can
19 you please explain further the rationale used for
20 the program's denial of our work agenda request?

21 DR. TUCKER: Okay. So first, I want
22 to thank you for the work agenda request. A lot

1 of thought goes into those work agenda items. I
2 think they are a very, very important tool for
3 defining the scoping the work of the Board. So I
4 think the formality of the work agenda process is
5 a useful construct for both a sort of project
6 management and also for communications.

7 One of the first, when we look at
8 petitions, we look at them against a number of
9 criteria, and the first criteria is is the work
10 agenda something that can be implemented because
11 it's within the scope of the Act and the
12 regulations? So just a very quick review that
13 Organic Food Production Act is owned by Congress.

14 The Act is owned by Congress, and then
15 the agency owns the regs that implement that Act.
16 And the Act on this is pretty clear on we call it
17 sort of the day-old chicks part of the Act. The
18 work agenda would have directly conflicted with
19 something that the Act is fairly clear upon. So
20 it was determined by USDA that if the Board
21 worked on it, it would not be within our
22 statutory authority to carry forward, and so

1 therefore we can't really approve that work
2 agenda item. We'd be working on something that
3 we don't have the authority to implement, and
4 that's not a good use of your time and resources.

5 MS. SWAFFAR: Okay. My second
6 question is that we've had several commenters
7 write in for several meetings on how they feel
8 that we can work on that, and that's adding to
9 205.238(c)(1), stating that the prohibition on
10 antibiotic treatment applies to poultry not under
11 organic management prior to day two of life.

12 Consumer Union did a -- has wrote that
13 in for varying, I guess four meetings now or
14 more. Do you think that OFPA would still have
15 the conflict, even if we wrote that in?

16 DR. TUCKER: If we believe that the
17 work agenda was -- is not included under the
18 provisions of OFPA. On this one we did. We did
19 get feedback from our general counsel on it and
20 they're very familiar with our regulations. And
21 so some work agenda items we are able to approve
22 right at the program. Other agenda items when

1 they relate to statutory authority, we do pull in
2 other folks from across USDA. This was one of
3 those cases.

4 MS. SWAFFAR: Okay. Third question
5 not related to day-old chicks.

6 (Laughter.)

7 MS. SWAFFAR: So just to general
8 review, from the time you receive a complaint
9 until the time that complaint is finished, what
10 is your typical time line there? Because I know
11 you talked about one was two weeks, but I think
12 that's pretty unusual.

13 DR. TUCKER: So what is -- it depends
14 -- it depends a little bit on the nature of it.
15 So let me give sort of a couple of business rules
16 on how that works. So when a complaint comes in,
17 the first thing we look at, and we -- so we have
18 a complaint intake specialist, and so -- and
19 Betsy works very closely with that intake
20 specialist to look at every single complaint that
21 comes in.

22 So one of the first things we look at

1 is is this actually a complaint, or is it really
2 a question and not a complaint. And so if it's a
3 question, then we answer the question and then if
4 it really isn't a complaint, it's simply handled
5 as a question. So those are handled within --
6 within a few days to a week.

7 Second, we look at the complaint for
8 whether there is evidence, and what the nature of
9 that evidence is, and we look at whether the
10 operation is certified or not. So if it is a
11 certified operation, then often but not always we
12 will refer it to the certifier, because the
13 certifier has the best on the ground knowledge
14 about what's happening with that particular
15 operation.

16 Now if there is reason to believe that
17 the certifier is somehow either involved or had a
18 problem, then we might keep it ourselves. But if
19 we don't see a potential issue with a certifier,
20 we'll refer it. And we give the certifiers a
21 deadline for getting back to us with their
22 investigative results.

1 That's an area we're working on in
2 terms of getting more timely responses from
3 certifiers on complaint investigations. Part of
4 our training needs to be training more on how to
5 conduct these complaints. There have been times
6 where we've gotten complaints in where on at
7 first look, it feels like a complaint but it
8 actually isn't, that it's a complaint about the
9 policy not the operation.

10 And so it will be a complaint that
11 says this operation is doing these awful things,
12 but it turns out that actually the complainant
13 doesn't like the policy, or doesn't like the
14 regulation as written but the operation, based on
15 all available evidence, is compliant. And so
16 those take sometimes a little bit of time to
17 identify as I call them policy complaints.

18 But often, we are able to and want to
19 close those on the faster side, because there
20 isn't evidence that the operation is actually
21 violating the regulations as written. There's
22 evidence that somebody doesn't like the

1 regulations.

2 So for the investigations where there
3 is a -- there is good evidence or there's
4 signaling of the potential to get good evidence,
5 those take longer. And so if it is significant
6 violations that might also involve other types of
7 violations beyond organic, so for example
8 identity theft or other types of violations,
9 those are where we will consider referrals to
10 other federal agencies.

11 Once a case has been referred to
12 another federal agency, it becomes their case
13 often, which means that we then don't have
14 control over the time line. So again, the nature
15 of the case, the evidence that comes with it,
16 whether the operation is certified or not, those
17 are all the variables that will dictate how long
18 those kinds of things take. Does that answer the
19 question sort of?

20 MR. CHAPMAN: Harriet.

21 MS. BEHAR: Good things come in
22 threes. I also have threes. I also have three

1 questions. So the first point is about the
2 Organic Integrity Database. I was thrilled to
3 see that you're looking at the county level,
4 because that has always been a frustration for me
5 and I think I've given comment to that program.

6 But I was wondering too if you were
7 going to be asking the certifier for information
8 on fields that they are managing organically,
9 that may not be directly adjoining their home
10 farm, which would then, you know, follow the
11 residential address. There's a lot of leased
12 land and whatever, you know, land that is not
13 directly adjoining.

14 I think that that would be useful both
15 for like drift watch and that sort of thing for
16 people to then be aware that this is organic
17 land, and as well to for crop insurance windows.
18 Farmers are applying for crop insurance. Then
19 it's already categorized as organic land in the
20 database.

21 DR. TUCKER: That's a great question,
22 and so the first question I would ask back is

1 well, how not adjoining exactly is this land,
2 because are still seeing some violations on 4009,
3 who needs to be certified. We are seeing some
4 incidences where we have operations that have
5 fields that aren't really anywhere close to each
6 other that are still under the same
7 certification, that really in all rights should
8 be separately certified.

9 So that is always the first question.
10 The database can accommodate reporting of acreage
11 at an awful lot of different levels, and so for
12 at least one large certifier that has electronic
13 systems that are managing this, they report
14 there's an operation level reporting tab in the
15 Excel template, and then there's a product level
16 tab.

17 So some certifiers are, if they're
18 multiple fields, here's the field, here's the
19 acreage, here's the crop. Here's the field,
20 here's the acreage, here's the crop. Now those
21 are not affiliated specifically with addresses at
22 the acreage, at the item level or the product

1 level. I would say to get more granularity on
2 the address itself, I'd go back to the original
3 question of should they just be separately
4 certified.

5 Right now, the database is oriented
6 around the entity that is certified. So one
7 certification, one listing, unless you're dual
8 certified and then you're listed twice. So we do
9 have some challenges with addresses, that not all
10 certifiers provide both addresses. The regs are
11 pretty open on this in terms of the type of
12 address. So we do get both addresses, but not
13 all certifiers report both and not all are doing
14 address checking.

15 MS. BEHAR: Just to respond to this,
16 to respond to that, there's a lot of rented land
17 that may even have been rented for generations
18 from a relative or whatever that is not
19 contiguous, and I know especially in California
20 much of the land is leased. It could be again
21 leased for 10 years, 20 years, and it may not be
22 contiguous. But it's been with that operator. I

1 think typically certification has gone with the
2 operator and not necessarily by parcel.

3 I think that asking each parcel if
4 they have a separate certification and pay a full
5 certification fee might be a little bit. But
6 that's not really what I'm asking for. I'm just
7 asking for the certifiers to maintain a location
8 for all those various fields, because again, that
9 could be useful to the producer as well as to
10 people who are just trying to find, you know,
11 which -- is this the organic field or not as far
12 as for drift issues or whatever.

13 DR. TUCKER: Yeah, some certifiers do
14 provide separate certificates, and then list
15 those certificates separately in the database.
16 So those would be considered separate
17 certifications for the purpose of the database.
18 So they have a unique NOP code. It may end up
19 being six fields with separate certificates and
20 therefore separate listings in the database.

21 So a lot of challenges I think of the
22 public-private partnership when it comes to data

1 is while there's a lot of concern about fair and
2 consistent certification practices, the same kind
3 of challenges and fair consistent certification
4 also lead to data is consistent and standardized,
5 it's the same sort of package of challenges.

6 MS. BEHAR: Okay. So the second one,
7 totally different. On the import fraud, I think
8 there's no -- I think there is a coincidence, not
9 a coincidence that the largest fraud that we've
10 had on the imports is in an area where we have
11 very low domestic production in corn and
12 soybeans.

13 So I'm just wondering, has there been
14 any thought within the NOP, we've had public
15 comment about this, that another way to prevent
16 that fraud is to bring up the domestic
17 production, to really get -- it's maybe above you
18 Jenny, but to have the USDA make a concerted
19 effort to see organic as a priority, and to try
20 to improve and increase the knowledge and
21 accessibility of organic production and then
22 certification.

1 So that I think that that would even
2 help with domestic problems if people felt more
3 accessible to an understanding of what the
4 regulations actually say.

5 DR. TUCKER: Yeah, I appreciate that
6 comment and those -- our conversations that we
7 certainly have had is how can we support domestic
8 production. There are a lot of private sector
9 initiatives that are rolling out in that. I
10 think are sound and sensible certification
11 materials from a few years ago are still accessed
12 quite often to help with the transition.

13 There will be a part of the Learning
14 Management System for organic producers who might
15 be interested in seeking certification. A lot of
16 that is -- it really does take local work, and it
17 really is a cultural element, as well as for the
18 government, providing sort of education and cost-
19 share assistance. It's also very much sort of
20 local communication and facilitation.

21 MS. SWAFFAR: Okay. My last point is
22 as member of the Livestock Subcommittee, I would

1 be remiss if I wasn't talking about the
2 antibiotic use in day-old chicks. So I'm
3 wondering about a kind of perhaps a guidance
4 document that could encourage producers to at
5 least seek out the information if those chicks
6 had been given antibiotics, either in vivo or at
7 day-old, because I know in the marketplace on the
8 conventional side, that it is being somewhat
9 phased out.

10 So I think some transparency on this
11 issue might cause it to not -- to operators to
12 choose hatcheries that are not doing that, as
13 long as there's some transparency. But right now
14 since they don't look at those day-old chicks or
15 the eggs that they've treated, that there's no
16 knowledge.

17 So I'm just wondering if we could do
18 a guidance document instead to encourage movement
19 away from that.

20 DR. TUCKER: So guidance documents are
21 going to require kind of the same scrutiny
22 honestly as regulations. So the first question

1 when we talk about wanting to do a guidance
2 document was well, show us how it is authorized
3 by the Act and the regs. So it's sort of a com
4 -- we can't do guidance on things that are
5 outside the authorities of either.

6 I would say that this is where I think
7 private sector labeling in terms of if this is a
8 claim that is important, there are USDA process-
9 verified programs that can verify that that has
10 been confirmed, certain production practices that
11 are outside sort of statutory authority, but are
12 perhaps a differentiator in the market.

13 I think those process-verified
14 programs may be a useful option to consider that
15 kind of differentiated marketing.

16 MR. CHAPMAN: Lisa.

17 MS. DE LIMA: Jenny, can you talk a
18 little bit about the BPA that was on the Handling
19 Subcommittee's work plan, that's been moved from
20 the active work agenda to the, I guess, not
21 active, how we did have handful of public
22 comments come through asking for an update and

1 why they weren't seeing that come forward?

2 DR. TUCKER: Sure. So the BPA was a
3 work agenda item that was actually initiated by
4 the National Organic Program several years ago.
5 So I think four years or so, where we sent a memo
6 to the Board asking them to -- asking the Board
7 to work on this topic or consider this topic.

8 I would say honestly a lot's happened
9 since then, and I think that right now, as a
10 program, we've determined that it's -- we
11 initiated the work agenda and now we're saying
12 yeah, actually that's not as important a priority
13 as some of the other topics such as imports. And
14 so sometimes we have to make tradeoffs on where
15 we want to spend energy and time, and so I think
16 you have more recently received a work agenda
17 item on imports, which the group has been
18 pursuing very diligently and I appreciate that
19 work.

20 That means that some other items will
21 need to be deprioritized, and for the moment, BPA
22 is one of them. So I think in terms of community

1 planning, being open about what we're actively
2 working on and what for right now is sort of
3 tabled, I think helps people plan in terms of
4 monitoring what's happening with the Board. So
5 we want to be honest and open about the fact that
6 right now we're deprioritizing this NOP-initiated
7 item.

8 MR. CHAPMAN: Dave.

9 MR. MORTENSEN: Jenny and NOP
10 colleagues, I want to echo what Emily had to say
11 about paper pots, and then I also wanted to make
12 a couple of assertions. You could choose to
13 respond to the assertions. They're not really
14 questions.

15 DR. TUCKER: Okay.

16 MR. MORTENSEN: It's my view that the
17 not allowing paper pot use in field season 2019
18 is disproportionately severe, and the impacts
19 will be very large. Other than the soil
20 hydroponic issues since I've been on the Board
21 and I'm in my second year, I have heard more
22 comments about this than any other issue.

1 It's my view that this is an issue
2 that we have to be very careful that we're not
3 regionally biased in our decision-making. This
4 is small and intermediate-sized growers that are
5 poorly represented at a meeting like this, and
6 that frankly are much less likely to have
7 organized voices in contrast to large growers who
8 often have had speakers coming to us who are paid
9 representatives or expert agronomists or whatever
10 that can commit three days to come to this
11 meeting and make such presentations.

12 Finally, during one of our
13 subcommittee calls about three or five months
14 ago, it was indicated that you were hearing
15 little in Washington, D.C. about the paper pot
16 issue. We can see from the public comments and
17 the written comments and the discussion that
18 we've had that we've been hearing a lot from
19 small growers, that to me this is an indication
20 of our problem with our information feed into
21 this system as Emily alluded to at the end of her
22 comments.

1 Small farmers are dispersed, they're
2 small. Their profit margins usually are very
3 thin, and time and to take out, to be keeping up
4 with all the sorts of rulemaking and writing is
5 extremely constrained. I can't imagine, I don't
6 know of a single farmer that would know that they
7 should be writing to you or to the Secretary of
8 Agriculture of the United States about an issue
9 like paper pots.

10 That simply wouldn't even be in the
11 minds of anyone that I know, and I probably know
12 about 50 pretty well, of having been on their
13 farms. So I just feel like this kind of an issue
14 doesn't get a fair shake, because the system in
15 my view is somewhat broken with regard to the
16 voice, or the lack thereof, in Washington, D.C.
17 on such an issue. Thank you.

18 DR. TUCKER: I appreciate that. I
19 think all the comments on paper pots have been
20 both eloquent and helpful, and so I genuinely
21 appreciate this feedback.

22 MR. CHAPMAN: Scott.

1 MR. RICE: Thanks. Jenny, we've
2 talked a lot about exclusions in the upcoming
3 rulemaking, and the one question that I've
4 received is about the \$5,000 exemption. I know
5 that's written into OFPA for small producers, but
6 it's become comically small. I know that that
7 was there. That maybe let people, kind of let
8 small producers test the waters of whether they
9 wanted to become certified after that.

10 It's also again just so small that it
11 doesn't really provide any sort of sensible kind
12 of level, and we're more looking at it either way
13 or a disincentive or incentive.

14 DR. TUCKER: You know, that's an
15 interesting question. Right now, we have not
16 been looking at that as part of the rulemaking.
17 Exemptions are fundamentally different from
18 exclusions. You know it's interesting. Joan,
19 our secretary in our front office, gets a lot of
20 calls from newly beginning farmers who are
21 working under the exemption.

22 We sort of had that conversation about

1 should that limit be raised. I'm not sure what
2 it would need to be raised to make a substantive
3 difference. So I think it's an interesting thing
4 to sort of keep an eye on. If you folks are
5 interested in sort of providing feedback on that,
6 right now it's not part of the regs. But I do
7 think just as civil penalties go up with
8 inflation, should the exemption also go up with
9 inflation? It's sort of an interesting question
10 that I don't have an answer to. But it's a good
11 question.

12 MR. CHAPMAN: Asa.

13 MR. BRADMAN: I'm not getting a light
14 here, but I think this is working. I wanted to
15 follow up on Lisa's comments and questions about
16 BPA. It sounded like from your response that it
17 was an issue of priorities for the decision to
18 temporarily put the BPA question on hold.

19 That it's not necessarily a question
20 of jurisdiction or authority. So I just wanted
21 to clarify that, and that maybe we can look
22 forward to working on the BPA issue.

1 DR. TUCKER: Yeah, I think it's a good
2 question. I think when you read the memo to the
3 Board that went in 2014, I'm not entirely sure
4 that that memo really stated yes, this is
5 absolutely in the statutory authority or no, it
6 isn't. So I think that if we decided to
7 reactivate that, I think that would be sort of
8 part of the question in terms of where are the
9 limits of the statutory authority with respect to
10 packaging.

11 And so I do think it is a larger
12 question that would need to be asked if that item
13 were reactivated. I think for right now, it's
14 not in the priority set given the other
15 challenges that we are jointly facing as a
16 community.

17 MR. CHAPMAN: Rick.

18 DR. GREENWOOD: Jenny, a quick
19 question on residue testing. As I mentioned, I'm
20 an organic avocado farmer. I've had my avocados
21 tested once in 17 years for residue, and that
22 came through a county inspector. Is there or are

1 there guidelines for residue testing that go to
2 the certifiers, or is there a plan to have
3 something standardized, because I think that's an
4 important component of the enforcement
5 activities?

6 DR. TUCKER: Yeah, I agree with the
7 importance of residue testing, so a few comments
8 on that. There was a residue testing rule in
9 2000, was it '13, '14, that requires residue
10 testing five percent is the level. We've also
11 required residue testing with respect to some of
12 the import investigation going on, that specific
13 imports from specific regions and commodities
14 were required, heightened testing there.

15 I think testing is a great tool, both
16 for monitoring surveillance and for enforcement.
17 So the residue testing pool formalized the five
18 percent. When we talked to certifiers about it,
19 we talked about the importance of testing in
20 collecting evidence but also risk-based oversight
21 in enforcement.

22 We need to and are in the process of

1 updating our residue testing guidance for
2 certifiers. The guidance is pretty out of date
3 in terms of the types of substances that should
4 be and can be tested. Also certainly detection
5 limits are dropping over time as technology
6 evolves.

7 So that, those documents need a bit of
8 an overhaul now, so need to be overhauled in the
9 context of enforcement and where the greatest
10 risks are in the market, because of a number of
11 commodities on a market or a geographic area, or
12 for example fumigants. So I think there's
13 certainly work to be done there.

14 We will be doing more training on
15 sampling and testing through the Learning
16 Management Center, for certifiers to make sure
17 they're sending their folks out with better
18 instructions on how to sample, where to sample,
19 when to sample.

20 DR. GREENWOOD: Okay. A follow-up
21 question since everyone else asked three. But
22 this is still on residues. Do you share data

1 with FDA, because they do a tremendous amount of
2 residue testing on import foods. So do you get
3 any residue data back from them, because it could
4 be a good source?

5 DR. TUCKER: We do get residue data
6 from FDA, and so that's -- and we use those to
7 inform investigations. We also closely
8 collaborate with our science and technology
9 program within our agency, Agricultural Marketing
10 Service, and so they also have a residue testing
11 program. So yes, we do get notifications from
12 FDA. They're a good partner on that one.

13 MR. CHAPMAN: Steve, then Emily.

14 MR. ELA: Jenny, you've been great
15 about as you've come on board with us about
16 transparency, and I really appreciate your candid
17 comments about what your decision-making
18 processes are. For this meeting, we've received
19 a number of comments from our stakeholders about
20 a couple of things within NOP, and one is first
21 of all the shortened time to -- for not having
22 the full 30 days for people to comment,

1 especially when we have a complex agenda.

2 And then the other is coming back to
3 the subcommittee notes that people, that are no
4 longer being published. I understand the cost
5 and time issues, and why those decisions were
6 made. But what ways can we get more timely and
7 better information out to our stakeholders, so
8 they have time to fully vet some of our decisions
9 and follow our process? It seems like we're not
10 quite where we need to be on that.

11 DR. TUCKER: Okay, thanks for the
12 comment. This just came up yesterday as well at
13 the National Organic Coalition meeting, so I'm
14 going to repeat some stuff that some folks may
15 have heard yesterday, but hopefully you won't
16 mind hearing it twice.

17 So first, the subcommittee notes, we
18 will be reinitiating that posting process, and so
19 we heard that feedback. Thank you so much. All
20 right. We heard that feedback loudly and
21 clearly. From an agency perspective, remember we
22 are -- NOP is one program of many within our

1 agency, and we post by far the most on the
2 website.

3 So the Public Affairs team, every
4 single time a document has to get posted, they
5 have to review it, because nothing goes up on the
6 website without them having a sense of what's
7 going to happen, and it has to also be reviewed
8 for what's called Section 508 compliance, which
9 means making sure it's accessible for people with
10 disabilities, which takes time. So all of that
11 takes time.

12 And so understandably, Public Affairs
13 has said to all programs hey, you know, take a
14 look at what you're posting. You're really --
15 what does your community actually need? So it
16 also relates to just we also get complaints about
17 how there's so much on our website that it's hard
18 to find things.

19 So where we can find documents that
20 perhaps if people aren't using as much, that
21 they're going to be times where we'll make
22 decisions about looking across the labor that

1 goes into that. It was taking about 20 hours a
2 month to post those minutes. That's a lot of
3 time, and it's time that we are not spending
4 doing something else.

5 I think the other thing is sometimes
6 folks appreciate having things but never say it.
7 So we don't know if people are using it or not,
8 right? So once we stopped posting subcommittee,
9 we got, heard a lot oh, you're not posting
10 subcommittee. No one had ever said before that
11 wow, thanks for posting those subcommittee notes,
12 we really use them and this is why.

13 And so I think if there's stuff on the
14 website that you really appreciate and want to
15 continue letting us know that, I got some really
16 direct and helpful feedback from the community
17 about the importance of posting enforcement
18 actions. So yeah, that's an area where we really
19 are advancing in what we're posting and really
20 advocating for that.

21 So we'll continue to post technical
22 reports on the NOSB meeting, materials.

1 Recognize it's an awful lot of documents. So we
2 are reposting the subcommittee notes. But I
3 wanted to give some sort of context on why that
4 kind of happened, and that we did hear you and we
5 are returning to those postings.

6 Now in terms of the comment period,
7 I'm going to try and briefly walk through the
8 process. So once a meeting ends, the clearance
9 for the Federal Register announcement for the
10 next meeting immediately goes into clearance. So
11 in fact Michelle has already written the meeting
12 announcement for the next meeting, the Spring
13 2019 meeting. I've already cleared it and it's
14 ready to go into USDA.

15 That takes a little bit of time,
16 because it goes in the Federal Register. So a
17 lot of people need to look at that before it's
18 actually published. But I wouldn't -- usually
19 now we're getting to the point where we can
20 announce the next meeting fairly soon after the
21 previous meeting.

22 When that happens, it opens what we

1 call the public docket, the open docket. So then
2 that docket is literally opened for anyone to do
3 public comments on all the way up to when the
4 public comment period closes. So if folks want
5 to post materials in that open docket, they
6 can't. So for example, the last meeting the
7 Board said hey, if you have information on this
8 please post it in the open docket once it's
9 launched, and indeed people did, and that was
10 helpful.

11 Where we I think want to look at the
12 business process further has to do with sort of
13 the late end of that process, where the
14 subcommittee's done its work and its package of
15 discussion documents and proposals that's ready
16 to go online and the public comment period.
17 Well, it has been opened all along. It really
18 starts in earnest because now there's something
19 to really read and comment on.

20 Now this is always going to be a
21 balance between the amount of time the Board gets
22 to work on stuff and the amount of time the

1 public gets to comment on stuff.

2 So we have really compressed the
3 period that breaches those two as fast as we can.
4 So once we get in the proposals and documents,
5 Michelle has to bundle all of those into a master
6 document, and it really does need to go through
7 some level of USDA clearance.

8 We have managed to get that clearance
9 down to about a week and a half. We're not going
10 to get it any faster than that. There are a lot
11 of people who need to look at 100 and whatever
12 pages before it goes up on a government website.
13 I think that's normal. And so we have briefings
14 internally about what these documents are, where
15 the controversies might lie, remind everybody of
16 the process that unfolds. A week and a half in a
17 big federal system is actually fairly rapid to
18 get all that done.

19 So that leaves us with either you guys
20 get less time to work on proposals, there's
21 shortened public comment, or we find a way to
22 post interim drafts in the open docket as you go

1 along. So let's say you finish a proposal or you
2 finish a discussion document early. You have an
3 early interim draft.

4 Where I think we might have some room
5 to move would be how could we introduce a
6 governance process where that material could get
7 reviewed, but it could be posted in the open
8 docket for people to read? So I think there
9 might be some room there. At the same time, you
10 guys know sometimes you're working on these
11 documents until the very last minute, and those
12 aren't going to be available as an interim basis.

13 So I think it's important for
14 everybody to understand the full time line,
15 because it also explains how we've implemented
16 the open docket recommendation from the Board. I
17 think that process can work well. I'm not sure
18 we're maximizing those tools quite yet. Did that
19 answer the question?

20 MR. ELA: Yeah, I think that's great,
21 and again I appreciate your being flexible on
22 learning what works and what doesn't work, and I

1 know as a committee chair, I mean just knowing
2 that when we finish documents in committee that
3 we can go ahead and send them to Michelle,
4 instead waiting until that last week and a half,
5 you know. That's something we need to be aware
6 of.

7 So I think it's a learning curve for
8 all of us. But thank you for that. Thank you
9 for your attempts to be transparent. Really, I
10 appreciate that.

11 MR. CHAPMAN: Briefly Emily.

12 MS. OAKLEY: Very briefly. Some
13 stakeholders have expressed concern that given
14 short comment periods or concerns over the work
15 agenda, that if they would like to suggest that
16 the Board send a document back to subcommittee
17 for further work, they have fear that it might be
18 removed from the work agenda because of staying
19 on the work agenda for too long.

20 So we talked about that already
21 yesterday, and I was just wanting to have you
22 clarify that for stakeholders, and give us

1 guidance on that.

2 DR. TUCKER: Thank you for that. It's
3 a great question. We have really formalized the
4 front end of the work agenda process in I think a
5 very smart and healthy way that really encourages
6 collaboration and honesty about what's possible
7 and what's not, and what the priorities are and
8 what the priorities aren't.

9 I think that in general when something
10 is approved and is on the work agenda, if it's
11 actively being worked on it needs to go back to
12 the subcommittee for more work. I don't see that
13 as increasing the risk of it, of it being taken
14 off. So I think part of the goal and the purpose
15 of the Board is to bring up those controversies
16 and to make sure that we get it right, and to
17 make sure that we get it with the best and most
18 public comment to inform any government action
19 that happens from there.

20 So if that takes going back to the
21 subcommittee for another round and more
22 discussion, then I don't see that as creating

1 risk for that item per se.

2 MR. CHAPMAN: Okay. I'm going to wrap
3 up with one question from myself, and then we'll
4 take a break, and Jenny I think it's a brief one.
5 But in your presentation, so going back to your
6 presentation, you were talking about equivalency
7 agreements, trade agreements and a focus on
8 compliance and enforcement. As you look into
9 those, what -- do you have some details on that
10 you can share? What does that mean?

11 DR. TUCKER: Sure, what does that
12 mean? So for example I think as equivalency has
13 evolved over time, everybody sort of learned
14 along the way of, you know, what equivalency is
15 and isn't and what it entails and what it
16 doesn't.

17 I think in the early time of
18 equivalency arrangements, and before some of the
19 I think the import fraud became front and center,
20 there was a strong emphasis when negotiating
21 equivalency on the standards.

22 So the practice standards and the

1 National List. So let's compare those, let's
2 compare standards, and I think over time there's
3 been a real expansion in attention to -- it's not
4 just about the standards. It's also about your
5 system overall, your ability to investigate
6 complaints effectively, your ability to accredit
7 effectively, oversee all the entities
8 effectively.

9 I think as we've seen with data, the
10 importance of having transparency in operations.
11 So for example, the Organic Integrity Database is
12 actually fairly unique as a public registry of
13 certified operations. Other governments don't
14 have that, and so that makes it harder to verify
15 organic certification of operations in
16 equivalency arrangements.

17 So I think taking closer look at data
18 on systems, on enforcement systems and making
19 sure all of those systems are sound including --
20 in addition to looking at the standards
21 themselves. It really does need to be about the
22 entire control. So that's the eye to which I'm

1 thinking when we're talking about a future and
2 maintaining equivalency arrangements. Does that

3 --

4 MR. CHAPMAN: Yes, thank you, and
5 thank you to the Board for your questions, and
6 thank you Jenny for your transparent answers.
7 It's been a very valuable discussion. Before we
8 move to break, I think we have one last item to
9 cover, and I will pass it back to Jenny to do
10 that.

11 DR. TUCKER: So we do, and this is a
12 fun one. So a while ago, I think like three
13 meetings ago, I got to announce that we had an
14 employee of the quarter for Lisa Brines. And so
15 we gave that award to Lisa and now I have another
16 one to give for one of the NOP staff members
17 who's present, and that is Devon Pattillo. So
18 Devon was our employee of the quarter this
19 period. Come on down, Devon.

20 (Applause.)

21 DR. TUCKER: So Devon gets a few
22 things for being employee of the quarter. He

1 gets -- first of all he gets a plaque, a
2 certificate of achievement that proudly
3 recognizes Devon Pattillo as employee of the
4 quarter for July, August and September 2018. Put
5 this up on your wall, and he also gets the Roving
6 Statue. So the statue says "National Organic
7 Program Employee of the Quarter in honor your
8 outstanding service." So he gets to keep this
9 for the quarter, and the he needs to mail it
10 back. Joe will give you the code, so they'll
11 mail that back to us. But this rotates and the
12 employee of the quarter gets to keep it on their
13 desk for that period. So that ought to increase
14 your luggage fee significantly.

15 And then to keep, Devon had the choice
16 of a clock or a suitcase, and he chose the
17 suitcase. So most people choose suitcase. It's
18 a roll bag for his various travels, to ensure
19 organic integrity.

20 (Applause.)

21 DR. TUCKER: So Devon, congratulations
22 and I'm going to give you a hug, and we'll do

1 pictures later. Okay. I think that takes us to
2 the break.

3 MR. CHAPMAN: Yeah. I had a question.
4 Is that luggage certified organic?

5 DR. TUCKER: You know, I get that
6 question a lot, and you know, most items we have
7 that have the seal is actually certified -- is
8 actually organic cotton. But with a suitcase,
9 you know, we've got to take a little bit of
10 license here. Okay, thank you.

11 MR. CHAPMAN: That's good, and I think
12 the Board also extends its congratulations to
13 Devon. You're an amazing resource for us, and I
14 don't think we could do our work without you. So
15 thank you so much.

16 (Applause.)

17 MR. CHAPMAN: Okay. So with that, we
18 will move to break. We're about 45 minutes
19 behind schedule, but we'll make it up somehow.
20 We will start back up -- sorry, my watch is on
21 Pacific time. We'll start back up at 11:15 with
22 public comments. Just so folks know, the first

1 public commenter up is Lynn Coody. So at 11:15.
2 We're in recess.

3 (Whereupon, the above-entitled matter
4 went off the record at 11:01 a.m. and resumed at
5 11:17 a.m.)

6 MR. CHAPMAN: Okay. We're going to
7 get started. Lynn, give me one moment. I've got
8 to run through some formalities.

9 DR. TUCKER: Okay. I'm just waiting.

10 MR. CHAPMAN: We're ready. Okay.
11 We're going to come back to order. We have eight
12 members present, which is a quorum. I ask
13 members of the public to either sit down at this
14 time or take their conversations outside. So
15 we're going to start the public comment. Before
16 we get to that, we're going to go over a quick
17 couple of formalities on process.

18 I normally go through a lengthy review
19 of our conflict of interest policy. In the
20 interest of time, I'm going to keep it quite
21 brief. But basically the NOSB's operations are
22 governed by our conflict of interest policy. Our

1 conflict of interest policy can be found in our
2 policies and procedures manual.

3 Prior to every meeting, a matrix of
4 the proposals and discussion documents before the
5 Board is distributed to the members. The members
6 are asked to present any conflicts of interest.
7 At this time, no conflicts of interest were
8 disclosed, but for just flexibility I'm also
9 going to allow members to express any conflicts
10 they may have here at this meeting.

11 Seeing none, we don't have any
12 conflicts of interest. So we normally go through
13 that at the beginning of every subcommittee, but
14 given that we have no conflict of interest
15 disclosed here, we will not be doing that for the
16 sake of time. Moving on, I'm going to really
17 briefly review our public comment policy. So all
18 persons wishing to comment to the NOSB need to
19 sign up first prior, and it's a first-come, kind
20 of first-serve format.

21 Comments are limited to one comment
22 per person. No proxies allowed, and that's one

1 comment either at the in-person meeting or at the
2 webinars. Persons are going to be called to
3 speak roughly in order of what's on the speaker's
4 list here. Clearly, we're running behind
5 schedule so we may call folks late or call folks
6 early, depending on how we run against that
7 schedule.

8 If we skip over someone, we'll try to
9 come back to you if time allows. We're going to
10 try to keep everyone who's on our schedule for
11 today in today. So that means we may cut some
12 breaks short or run a little bit late if
13 necessary.

14 I ask that members of the public
15 please try to take conversations outside. I also
16 ask everyone, members of the public as well as
17 members of the Board to silence your cellphones
18 or computers, so that we can clearly hear the
19 speakers commenting to us. Use of media to
20 document these meetings is allowed. I ask that
21 members of the public who are using media to
22 respect both of the stanchions, as well as the

1 speakers going up and try and limit their use of
2 this so as not distracting to either the speaker
3 or the Board.

4 Lastly, the commenters should refrain
5 from making personal -- you can go to the second
6 page Michelle -- I'll go through this. This is
7 actually quick. So time robin is three minutes
8 per speaker. We have -- do we have the color
9 thing up there? I can't see it, but it's
10 probably lower.

11 So it goes green when you start
12 speaking. At one minute it will go yellow, and
13 then when the time is expired it will go red and
14 buzz? At that red buzzer, I do ask that
15 commenters try to wrap up their comments on that
16 last, their last sentence there.

17 We ask that commenters start with
18 their name and relevant affiliates at the
19 beginning of public comment. If any member of
20 the Board has a question about the relevant
21 affiliations of a speaker, I ask that you hold
22 until the end of their comment and then ask any

1 additional questions at that time.

2 Again, commenters have three minutes,
3 but once that three minutes is completed, then I
4 will look for questions from the Board that they
5 may have for that individual speaker.

6 Individuals providing public comment to the Board
7 are asked to refrain from personal attacks that
8 might impugn the character of any individual. If
9 we hear any of that coming, I will interrupt the
10 speaker and ask them to refrain from that
11 activity.

12 Then members of the public, I ask to
13 clearly and succinctly convey their issues before
14 the Board. With that, I think that's the
15 formalities, and so we will start with the first
16 commenter up. I will call Lynn Coody and on deck
17 is Christine Badger. Lynn, if you could start
18 with your name and relevant affiliations.

19 MS. COODY: Hi. My name is Lynn Coody
20 and I'm presenting comments for the Organic
21 Produce Wholesalers Coalition, seven businesses
22 that distribute fresh organic produce across the

1 U.S. and internationally. In our comments to the
2 NOSB, we express our own ideas and also provide a
3 conduit for the voices of many certified growers
4 who supply our businesses.

5 Ethylene for pineapples. OPWC has
6 provided detailed written comments on 15 of the
7 2020 sunset materials specifically focused on how
8 these materials are currently used and needed by
9 produce growers and handlers. One of these
10 comments is on ethylene for pineapple production.
11 At the last Board meeting, Emily asked me for
12 information about the horticultural need for
13 ethylene.

14 In response, OPWC created a survey
15 which we sent to all pineapple producers listed
16 in the Organic Integrity Database, as well as
17 agronomist researchers and handlers who work with
18 pineapple.

19 We summarized the information they
20 provided in our written comments, and concluded
21 that induction of flowering is a critically
22 important element of an integrated system of

1 horticultural practices used to produce organic
2 pineapple, and at this time ethylene is the only
3 commercially available option for floral
4 induction.

5 Therefore, ethylene satisfies the
6 evaluation criterion of necessity for this use,
7 and OPWC strongly supports the recommendation for
8 continued list of ethylene gas for pineapple.

9 Genetic integrity of seed. OPWC
10 believes that finding ways to keep seed and
11 planting stock free from contamination by genetic
12 engineering is critically important. We support
13 the proposal for a pilot program focused on seed
14 corn. Our comments detail eight reasons why we
15 think the proposal provides a reasonable way to
16 transition from discussion of this critical issue
17 into taking action to address it.

18 Sodium citrate. OPWC respectfully
19 disagrees with the committee's recommendation to
20 approve the petition. We agree that evaluation
21 of sodium citrate presents broader issues. We
22 concluded that NOSB review of inputs to inputs is

1 outside the scope of OFPA, and we think that
2 taking action on this outlier material could have
3 unintended consequences on the use of other
4 natural materials that are long-standing organic
5 inputs.

6 Paper planting pots. OPWC supports
7 the request for technical review of this
8 product's manufacturing process as a step towards
9 further review as a production aid. We urge the
10 Board to prioritize action as we know that many
11 produce growers who are managing operations on
12 different scales have been using this material in
13 good faith with approval of their certifiers.

14 To avoid disruption of these certified
15 operations, we urge withdrawal of the NOP's 2018
16 phase out requirement to allow time for NOSB to
17 review paper pots. Thank you for the chance to
18 comment.

19 MR. CHAPMAN: Thank you. Questions
20 for Lynn? Harriet.

21 MS. BEHAR: I wasn't sure if it was
22 working. Hello Lynn. Thank you very much for

1 your very detailed comments. I think anyone who
2 does public comments could look at your comments
3 and learn how to do a comment that makes it
4 really easy for the National Organic Standards
5 Board to review.

6 I want to especially thank you for
7 pointing out not only what you dislike about a
8 proposal, but also pulling out the items that you
9 specifically like and specifically on the genetic
10 integrity transparency so at least we learn if
11 we're headed in the right direction.

12 I have a question about the sucrose
13 octanoate esters. You I believe were the only
14 public commenter both before and now to
15 specifically state that you wanted to keep it.
16 Many had no comment. So I'm just wondering, do
17 any of your producers use it? Have they used it
18 in the past and found it to be effective on their
19 farms, in the crops section?

20 MS. COODY: Well, I have stated OPWC
21 often does these surveys of growers, and we did
22 at the prior sunset period for this we did a

1 large survey about the good old 2017 materials,
2 when there was a whole big batch of them, and
3 that material was included on that one.

4 At that time, we got two growers who
5 reported they were using it. So that's been a
6 few, a couple of years ago now. But we suggested
7 that the listing not be removed because we felt
8 that it had met all of the criteria, except for
9 possible, possibly people weighing in on it. And
10 as has been noted here earlier, it's really
11 difficult to get farmers to write in.

12 We have the advantage of having
13 basically produce buyers connecting with these
14 growers. So they have a reason to open emails
15 from us. Even with that, we get -- it's
16 difficult to get comments on these types of
17 materials. So we are suggesting that when NOSB
18 is taking a material off the list, that there be
19 more due diligence to try to get information from
20 farmers.

21 We suggested two methods to do that.
22 One is to work with the Organic Integrity

1 Database to try to identify which type of growers
2 who are likely to be using this and contact them
3 directly, which is what we do when we have, we
4 need information about that. So you can look at
5 our comments for more information about that.
6 That's the type of thinking we have.

7 It's hard to know who needs these
8 materials with the system that we're using right
9 now, in my opinion.

10 MR. CHAPMAN: Emily.

11 MS. OAKLEY: Thank you so much for
12 your detailed comments on ethylene. I really
13 appreciate that, and I also want to express
14 appreciation for your very thorough reading of
15 the marine materials discussion document. I
16 wanted to ask you a specific question.

17 You expressed some concern, as a few
18 other commenters have as well, that certifiers
19 may not have the skills necessary to accurately
20 or adequately certify seaweed or marine
21 macroalgae to the wild crop standard.

22 MS. COODY: Yeah.

1 MS. OAKLEY: And I think that is a
2 legitimate concern. But I wanted to ask you how
3 do we address that in the face of the fact that
4 we know those same products are being currently
5 certified to the wild crop standard for stock
6 feed and then also some cases human consumption?

7 MS. COODY: Yeah. I think that it
8 definitely would take a specialty inspector to
9 have that kind of information. I read a couple
10 of different reviews about how one might go about
11 assessing these seaweed areas, and it required a
12 knowledge of the food chain, the substrate, the
13 tidal, the tidal patterns, etcetera.

14 And so there could either -- there's
15 kind of two ways to go about it. You can train
16 certifiers to be, to have littoral ecologists on
17 your staff, or you can have a dumbed down
18 standard that is easy, that has really distinct,
19 clear criteria for being able to evaluate it. So
20 either way, I'm not sure that is -- that second
21 one, I'm not sure it's really addressing the
22 concerns about seaweed.

1 So I'm not sure exactly how to make it
2 happen, and I'm not clear exactly how it is being
3 certified right now, whether those certifications
4 are meeting the true standards of expectation as
5 expressed by the subcommittee in its document.

6 So I don't know about that, yeah. Thank you, and
7 thanks for reading all those comments.

8 MR. CHAPMAN: Okay. I've got Asa,
9 Dave and myself, then I've got to cut it off
10 there. Asa.

11 MR. BRADMAN: I just wanted to ask if
12 you can elaborate a bit more on the comments on
13 the AITC, and if any of your producers, have they
14 specifically expressed interest in this, or is
15 this something that you feel like, based on your
16 experience, would be helpful? There's clearly
17 disagreement there between your review of our
18 proposal.

19 MS. COODY: Yeah, yeah. Thanks for
20 that question. Luckily we can call it AITC
21 because it's so darn hard to pronounce. It's a
22 tongue-twister. So basically this is a product

1 that's derived from -- it's from mustard plants,
2 and we suggested that one possible use for it
3 would be to replace the materials that are
4 currently used for nursery stock certification.
5 So as you know, right now we allow some use of
6 non-organic nursery stock, which can be fumigated
7 with just about everything.

8 So I come from Oregon where there's
9 lots of nurseries and lots of fruit stock being
10 sent around the state. We were thinking it would
11 be a great idea if we could find a way to use
12 this particular material through a very discrete
13 annotation just for that use, to foster the use
14 of organic nursery stock.

15 It's really difficult to produce
16 organic nursery stock because it's -- I mean like
17 say for apple trees. It sits there for years
18 before it's coming out of the nursery, and then
19 it has to be protected to a very, very high
20 degree to pass these phytosanitary
21 certifications.

22 So yeah, we do certify. I mean we do

1 have a lot of growers who are certified for fruit
2 production and nursery production who would be
3 happy to be able to access more organic nursery
4 stock, especially nursery stock that, for
5 example, is specifically designed to deal with
6 fire blight and other really difficult issues
7 that face organic growers more so than -- you
8 know, they're challenged by this more so than
9 conventional growers.

10 MR. BRADMAN: Would this material be
11 accepted by APHIS or USDA to meet those
12 phytosanitary standards?

13 MS. COODY: Well, that's a darn good
14 question Asa, and if I had more time in this
15 comment period I could have looked that up a
16 little bit better.

17 But that's why we suggested that it
18 come back again, and that there be a chance to
19 assess that. We have -- there was some
20 information in the TR stating that phytosanitary
21 requirements are state by state, sometimes even
22 region by region depending on which diseases and

1 insects are endemic.

2 So that's a good question, and I think
3 probably we'd have to be talking to state
4 departments of ag about that.

5 MR. CHAPMAN: Dave.

6 MR. MORTENSEN: Yeah, I mean I also
7 just wanted to echo that I really like the idea
8 of using the Organic Integrity Database in a more
9 active effort on the part of NOP and OSB to get
10 information from the growers who are impacted by
11 some of these changes. I thought that was
12 really, really wise. Thank you.

13 MS. COODY: Thanks, Dave.

14 MR. CHAPMAN: Okay, and I have one
15 last question. You commented on silver
16 dihydrogen citrate, stating I believe something
17 along the lines of it not being necessary for
18 production. We heard some different comments
19 from other produce handlers. Is this something
20 you could go into a little bit?

21 MS. COODY: Right. So we were not
22 necessarily sure whether that one was necessary

1 for produce. We were actually favorably disposed
2 toward that one when we first read it because it
3 does have a different mode of action than most of
4 the other things that we have on the list, and
5 that's something that OPWC does support.

6 Our concern came up when we read the
7 EPA's information that was in the TR, that stated
8 something like, you'll have to look at my
9 comments to get the quote. But it's something
10 like when you use this, you must be able to
11 notify the municipal water disposal system,
12 because it has an impact on that.

13 So we were concerned about impacts on
14 water, because we know that when in many cases
15 when it's used for produce, it's not going -- the
16 wastewater's not going into even a municipal
17 system.

18 It's a rural system. It's sometimes,
19 you know, ponds and different underground systems
20 right on the site. So we felt like again, we
21 needed more time to take a look at that issue,
22 because we felt like it did have some legs.

1 So it wasn't a matter of not reading
2 it or not feeling like it was necessary for
3 produce. We just had a lot more questions about
4 that material. So that's, that was our comment
5 on that one.

6 MR. CHAPMAN: Thank you. Is it really
7 brief? Jesse.

8 MR. BUIE: Yes, just really.

9 MR. CHAPMAN: Really brief.

10 MR. BUIE: Yeah. Was there any
11 concern for beneficial, the effects on beneficial
12 bacteria in the soil?

13 MS. COODY: We had general concerns
14 for the use of that material in any capacity
15 because of the warnings about wastewater. So
16 since wastewater, in some cases in produce
17 operations it is going onto soil or into, like I
18 said, waste treatment systems that are other than
19 municipal systems, yeah we had some additional
20 questions on that based on the EPA's own words.

21 I know on the webinar, there were
22 someone who directed Dave to go look at those,

1 that EPA document. So that's an important one,
2 and I think it needs to have some more scrutiny.

3 MR. CHAPMAN: Thank you.

4 MS. COODY: Okay, thanks.

5 MR. CHAPMAN: Thank you, Lynn. Up
6 next is Christie Badger, followed by Jaydee
7 Hanson.

8 MS. BADGER: Good morning. My name is
9 Christie Badger, and I'm speaking on behalf of
10 the National Organic Coalition. Thank you for
11 your service on the Board and for your commitment
12 to organic integrity.

13 I have a comment regarding the limited
14 comment period, but I think we've heard a bit
15 about that. So I'd just like to say yesterday in
16 the NOC pre-NOSB meeting we heard Deputy
17 Administrator Jenny Tucker say that the open
18 document is an under-utilized resource, and that
19 she thinks we could come up with a process to use
20 the open docket as a two-way communication tool
21 between stakeholders and the NOSB.

22 We would encourage the use of this --

1 of the open document for questions from the
2 subcommittee, and not just draft materials, and
3 request this be taken into consideration. In
4 addition, she shared plans to restart posting of
5 subcommittee notes. Thank you Dr. Tucker. Your
6 spirit of collaboration is greatly appreciated.

7 Paper pots. With much information and
8 many comments shared regarding this ingenious low
9 tech system, NOC would like to add our voice to
10 those requesting the prohibition be extended on
11 paper pots. NOC asks the NOSB to add your voice
12 by putting forth a resolution to recommend the
13 prohibition be postponed.

14 Natamycin. NOC supports the Crop
15 Subcommittee's voice to add natamycin to 205.602,
16 non-synthetic substances prohibited for use in
17 organic crop production. As an antimicrobial
18 substance that has medical application, and is
19 known to result in anti-microbial resistance,
20 nanomycin should not be allowed in organic crop
21 production.

22 As demonstrated in research included

1 in the petition and reviewed in the TR, nanomycin
2 has resulted in resistance in candida albicans.
3 Anti-microbials with medical uses should not be
4 used in agriculture, and particularly not organic
5 agriculture. Further, NOC would ask the NOSB to
6 put nanomycin on the livestock work agenda, to be
7 listed at 205.604 as a prohibited non-synthetic.

8 Energy infrastructure impacts. Please
9 add the study of energy infrastructure impacts to
10 the work agenda, with an end goal of guidance for
11 instruction developed by the NOP that would
12 provide resources that could be shared with
13 certifiers and producers, to aid in maintaining
14 certification and improve consistent application
15 of the standards.

16 One such resource that has been proven
17 effective by the Ohio Ecological Food and Farm
18 Association and has prevented decertification on
19 more than one occasion is the Organic Agriculture
20 Impact Mitigation Plan. We are not asking the
21 NOP or the NOSB to take controversial action
22 against any industry or practice. Thank you.

1 MR. CHAPMAN: Thank you. Emily.

2 MS. OAKLEY: Thank you for your
3 comments on paper pots. I know that we discussed
4 within our subcommittee the issue of precedent
5 that the program is concerned about, and I just
6 wanted to know if you saw any similarities
7 between paper pots and some other issues.

8 MS. BADGER: Thanks, Emily. We
9 definitely do. There are so many issues right
10 now that -- I mean if we're being frank,
11 sometimes come under the don't ask, don't tell,
12 let's not talk about it. GMO vaccines. We need
13 to petition them to be on the National List.
14 Treated twine being used all over farms, sodium
15 nitrate, inerts, naled and after the last TR
16 perhaps paper itself.

17 MR. CHAPMAN: Steve.

18 MR. ELA: Natamycin. I appreciate
19 your comments. It's one I go, I mean I tend to
20 agree but I struggle with a little bit because it
21 obviously could have use for anti-rot and
22 preservation of fruit, and certainly with patulin

1 and some of those other things which are human
2 health concerns as well.

3 It could help prevent some of those.
4 I mean is your thought on banning it just it has
5 that crossover on human health for treatment of
6 human health, and you think that's significant
7 enough to actually put that, to protect that use
8 only for human health?

9 MS. BADGER: Steve, I am really glad
10 you did ask that question actually. I do feel
11 strongly enough. Do you know, one of the
12 webinars which you know I take very close notes
13 on, one of the speakers suggested that oh, in the
14 U.S. it's not really used for human health.
15 That's only in Third World countries.

16 It is amazing we had -- there were
17 probably a dozen people on a NOC call when we
18 were discussing this, and one of them who is new
19 to our group, working with I'm sorry, I can't
20 even tell, Maine Organic --

21 PARTICIPANT: MOFPA.

22 MS. BADGER: Thank you, MOFPA,

1 actually said -- he goes you know, I actually
2 have personal experience with this. I had
3 something wrong with my eye, and my eye doctor
4 was like it really hard to find any medication
5 that actually works for eyes anymore, and he said
6 I had to use nanomycin, and it was the only thing
7 that cured this.

8 Then the other thing that I just have
9 to say, and so many people know I'm very kind of
10 blunt. But I'm just going to say this, Steve.
11 You know, the candida albicans yeast infection,
12 the gentleman that never, that said that it's not
13 used just must have never had one, but frankly,
14 you know.

15 (Laughter.)

16 MR. CHAPMAN: I think we'll stop that
17 comment there. Ashley, you ready to follow up
18 that?

19 MS. SWAFFAR: Are you the one to ask
20 about gums, or should I direct that comment,
21 question to someone else?

22 MS. BADGER: It should be directed to

1 someone else. I'd be happy to try to answer it,
2 but I'm not certainly -- that's not one of my
3 strongest points.

4 MS. SWAFFAR: Okay. Would Abby be the
5 better person to direct my question about --

6 MS. BADGER: Can you tell me what the
7 question is, and then maybe I could --

8 MS. SWAFFAR: Well, you guys suggested
9 that the gellan gum should expire, but you guys
10 also suggested that we delist carrageenan and
11 gellan gum. Is there a replacement for that? So
12 I just -- and I said that when I voted for carra
13 -- to remove carrageenan.

14 I was very concerned that the next
15 time that gums came around, that everybody should
16 see we shouldn't remove them from the National
17 List. So I want to know some more detail on why
18 you say that.

19 MS. BADGER: I am going to actually,
20 if I could, refer that to our member
21 organization, Beyond Pesticides, and again
22 because it's just not my strongest area.

1 MR. CHAPMAN: Harriet.

2 MS. BEHAR: So I have a question about
3 the energy infrastructure. So we have been
4 struggling with this, of how it fits in. So your
5 point of providing information to aid producers
6 and certifiers in maintaining their organic
7 certification during the activities of energy
8 infrastructure moving through organic land.

9 This is -- so this is what -- this is
10 the direction that you're looking, that you would
11 like to take. Because so it's not a banning of
12 it; it's just a matter of how to best, a best
13 practice in a way or guidance for certifiers, so
14 that across the country and across the world when
15 this occurring, those operators and certifiers
16 can deal with this, so it allows that land to
17 retain organic production.

18 Is that the way you're looking, that
19 our work agenda item maybe would look?

20 MS. BADGER: Right. So my next
21 sentence I didn't get to, but I'll just say
22 prohibited substances can be identified when

1 energy infrastructure occurs on organic farms,
2 and alternative materials and practices that do
3 not jeopardize the viability of certified
4 operations are available and have been used.

5 We heard on one of the webinars from
6 Doug Raubenolt, who is an organic inspector. He
7 has been hired through these impact mitigation
8 plans to oversee farms, organic farms where this
9 work is taking place. He presented on the
10 webinar four distinct questions that he had, and
11 that was just one person.

12 So we've talked about putting together
13 an expert panel that could come up with and
14 inform this discussion with some very distinct
15 points for clarification, that the Board could
16 then discuss and some perhaps guidance for
17 certifiers could be provided. Right now, there
18 is nothing so everybody's winging it.

19 MR. CHAPMAN: Thank you. Thank you
20 for your comments. We'll move along. Thank you
21 for your comments.

22 MS. BADGER: Thank you.

1 MR. CHAPMAN: So up next, I had called
2 Jaydee Hanson. Jaydee Hanson had provided
3 comments previously on the webinar, and we only
4 allow one comment in the webinar or in person.
5 So I'll be moving to the next commenter, which is
6 Gwendolyn Wyard, and Gwendolyn is Johanna
7 Mirenda. Sorry for putting you on the spot there
8 Gwen. Gwen, if you can start with your name and
9 affiliation for the record.

10 MS. WYARD: All right. Good morning
11 NOSB, NOP staff and ladies and gentleman of the
12 gallery. My name is Gwendolyn Wyard. I serve as
13 Vice President for Regulatory and Technical
14 Affairs for the Organic Trade Association. First
15 I'd like to welcome Dr. Greenwood and Mr.
16 Schwartz, and I should also welcome Scott Rice's
17 beard to this meeting.

18 (Laughter.)

19 MS. WYARD: All right. So I'm going
20 to focus on two topics this morning, with one
21 take-home message for each topic. The first is
22 pull-u-lan, pullulan. The Organic Trade

1 Association is the petitioner of this material.
2 In short, pullulan is produced via fermentation
3 and this is used to make vegetarian capsules that
4 are then used for encapsulated dietary
5 supplements that are certified to the "made with"
6 category.

7 Organic capsules are not commercially
8 available, and the only alternative at this time
9 is an animal-based gelatin capsule, which is not
10 appropriate for vegetarian products. So why the
11 petition? Since at least 2003, as far as I am
12 aware of, certifiers have been classifying
13 pullulan as agricultural and allowing it in the
14 30 percent non-organic portion of a made with
15 product.

16 In response to NOP guidance that came
17 out in 2014, certifiers are now classifying as
18 non-agricultural, which means it must appear on
19 the National List to be allowed in NOP certified
20 products. Without its continued allowance, we
21 estimate that the economic impact to the organic
22 dietary supplement sector would be over \$825

1 million.

2 Our take-home message on this topic is
3 that we recognize that there is some debate about
4 the classification status, and we agree that
5 there's some ambiguity to it. For all the
6 reasons that are documented in the technical
7 report, which is well done and in our comments,
8 we believe that it should be classified as non-
9 agricultural, and more importantly, we want it to
10 go through the full NOSB National Review process,
11 appear on the National List and be under
12 continuous NOSB review.

13 Organic seed usage. The Organic Trade
14 Association emphasizes that organic seed is the
15 foundation to a thriving farming, organic farming
16 system, and in order to require operators to
17 demonstrate continuous improvement of organic
18 seed usage, over time a regulatory change is
19 needed.

20 Take-home message on this topic is
21 that this has been on NOSB's work plan for a very
22 long time. There's been great work that's gone

1 into it, and while the proposal to update
2 existing guidance continues to surface a swarm of
3 discontent if you will, we believe that there's
4 very strong support to revise the regulation to
5 require continuous improvement.

6 We find the intent of your proposal to
7 be clear on the regulatory change. We believe
8 that wordsmithing, the ands, ors, commas at this
9 point is counterproductive to progress, and we
10 ask you to please pass this portion, make a
11 single motion to pass the regulatory change
12 that's in that proposal, and bring the guidance
13 back to subcommittee for more work.

14 In closing, the Organic Trade
15 Association represents 9,500 members across the
16 U.S. and across the supply chain. We're here
17 because we're committed to both promoting and
18 protecting organic agriculture and making organic
19 a part of everyone's everyday lives. The NOSB
20 process is very important to our organization and
21 to our members, so we thank you all for your time
22 and dedication that you put into your work.

1 Thank you.

2 MR. CHAPMAN: Thank you. Questions
3 from the Board? Lisa?

4 MS. DE LIMA: Do you have any insight
5 on the time line on the availability of organic
6 pullulan?

7 MS. WYARD: Availability of organic
8 pullulan. So the company Capsugel has been
9 working on organic pullulan for some time.
10 Actually, the parent company is Lonza. They are
11 European. They are committed to not only making
12 the perfect product with the quality that meets
13 everyone's specifications, but they're also
14 committed to being able to meet the demand which
15 is continuously growing.

16 I believe that they will be here today
17 if you can direct that comment to them, but I
18 think you probably will get the same answer, that
19 they are working as quickly as possible. People
20 are lining up out the door to use organic
21 pullulan, because the only way that you can use
22 -- put the USDA organic seal on a dietary

1 supplement is to use an organic capsule.

2 The weight of that capsule, if you're
3 using non-organic pullulan-based capsules, only
4 will allow it into the made with category. So
5 there's a huge incentive to use organic. This
6 petition is to keep the continued use in the made
7 with category only. That petition's very
8 specific to supplements in the made with category
9 only.

10 When organic becomes available, we're
11 absolutely confident that that's where companies
12 will go, so that they can use that USDA organic
13 seal.

14 MR. CHAPMAN: I had a question and
15 then we'll go to Harriet. So did you indicate
16 that pullulan's not allowed or not mentioned in
17 international standards? What's going on in
18 those markets? What are companies using as an
19 alternative?

20 MS. WYARD: Yeah. So that's an
21 interesting situation. We are unique in the
22 United States in that we're the only country,

1 we're the only regulation that is actually
2 looking at the capsules. So in Europe, they're
3 not considered. They don't calculate them when
4 they do the organic percentage, and they don't
5 look at the composition.

6 So they're really, they're basically
7 viewed as packaging. So that's why you're seeing
8 it. I noticed in the TR-2 it goes through all
9 the different international standards. It's
10 either they're not on the list or it's not
11 allowed.

12 But that's because they're not
13 considering the capsule the way that we do, where
14 not only do we look at the composition of the
15 capsule that's used for a dietary supplement, but
16 we also calculate it into the percentage of
17 organic.

18 MR. CHAPMAN: Harriet.

19 MS. BEHAR: So thank you for your very
20 detailed comments on the genetic integrity
21 transparency document, and I had a couple of
22 responses. As far as the level of purity, it

1 would be up to the producer of the seed to go
2 within those specific level of purity just to
3 make the database collection of information
4 clear.

5 But if they wanted to have the
6 specific level of purity, they could do that as
7 well. It's not meant to constrict what
8 information is being transferred. We're just
9 looking for transparency, so that the producers
10 who are growing out that seed know at least what
11 they're starting out with.

12 And then there's some other aspects
13 that we will be dealing with. I also wanted to
14 ask you about your response to the paper pots and
15 expanding it to other uses of paper beyond just
16 pots, like seed tape and things like that. We
17 really haven't had a chance to talk about it
18 within the Crop Subcommittee, but we also have
19 not clarified what our technical review will be
20 covering, so we will discuss if want to be adding
21 that.

22 I know that whatever happens, we don't

1 want to slow down our work on paper pots, but I
2 don't know if adding those things would or would
3 not. So would you encourage us to make sure if
4 we took longer, that we should try to look at
5 every use of paper that we could think of and try
6 to get that covered in the TR, or would you be
7 okay if we only did a TR just on the pots?

8 MS. WYARD: I'm going to stay in my
9 lane on that question, and I'm going to defer to
10 our Farm Policy Director, Jo Mirenda, who's up I
11 think in a couple of commenters, if that's okay.
12 All right, great. Thank you for the
13 clarification.

14 MR. CHAPMAN: Thank you, Gwen. All
15 right. Up next is Jo Mirenda, followed by Beth
16 Unger on deck. Jo, if you could start with your
17 name and affiliation for the record.

18 MS. MIRENDA: Okay, I have new
19 affiliation. Good morning. My name is Johanna
20 Mirenda and I'm the Farm Policy Director for the
21 Organic Trade Association. I'll be commenting
22 today on paper pots and marine materials.

1 The Organic Trade Association supports
2 the allowance of paper to be planted in the soil
3 when used as a planting aid, because paper is
4 already allowed for equivalent uses such a mulch.
5 In terms of the impact on human health or the
6 environment, there is no meaningful difference
7 between the allowance of paper as mulch and the
8 petition use of paper. Both have direct contact
9 with the soil; both uses allow paper to
10 biodegrade.

11 In our written comments, we further
12 address the issue of adhesives. In short, we
13 support a technical review of those adhesives
14 that are intentionally added after the paper is
15 manufactured, to further formulate the paper into
16 final products.

17 As the NOSB proceeds with its review,
18 we strongly encourage the Board to take a broad
19 approach for reviewing paper-based planting aids
20 to be inclusive of generic products that are
21 paper-based and used as planting or seeding aids.
22 There's a broad spectrum of paper-based products

1 that are made from the same types of materials,
2 paper, and used in the same manner, planted in
3 the ground, but are designed in slightly
4 different ways.

5 If the listing is limited only to pots
6 and containers, you might find yourselves in this
7 position reviewing new petitions for nearly
8 identical materials that are designed in slightly
9 different ways, such as the tapes that Harriet
10 mentioned.

11 A broadened approach will make
12 efficient use of your time to review this variety
13 of materials, and will also allow for a scale-
14 neutral review of paper-based planting aids,
15 which could be designed by a variety of
16 manufacturers for various scales of production.

17 On to marine plants. The intended
18 goal of the Materials Subcommittee is to protect
19 marine environments from potential contamination
20 and destruction caused by marine plant
21 harvesting, and we fully support this effort.

22 But we do have questions about the

1 feasibility of implementing a requirement that
2 marine plants be certified organic as a means for
3 achieving these specific sustainability goals.

4 In our written comments, we identify several
5 areas of study such as assessing the
6 sustainability outcomes of the each, the crop's
7 certification scope versus the wild crop's
8 certification scope, and also assessing existing
9 efforts of NGOs and other relevant organizations
10 that are active in marine ecosystem
11 sustainability.

12 We look forward to further discussion
13 on this topic with OTA's members and with the
14 NOSB. Thank you.

15 MR. CHAPMAN: I will start with
16 Harriet and Sue and Emily.

17 MS. BEHAR: In your former life as
18 working with OMRI, there is an OMRI mulch that's
19 approved, that's listed. Weed Barrier I think
20 it's called. I see it advertised and I see the
21 OMRI listing. I'm just wondering, was that
22 virgin paper, was that recycled paper? Did it

1 have adhesives, because you know, there's already
2 a mulch that's a paper mulch, and I'm wondering
3 how deeply OMRI reviewed that and if there's some
4 synergy here with the discussion on paper pots.

5 MS. MIRENDA: The composition of that
6 specific product I can't recall on the spot. But
7 in general, when paper is being reviewed under
8 its current listings on the National List, there
9 is a mulch or a feedstock, it's a deceptively
10 complex listing, and I can guarantee that OMRI
11 and many other certifiers have had in-depth
12 conversations about what is paper, what are the
13 different sources, what are the different
14 composition fibers, what are the additives, when
15 are they added?

16 If you add the adhesives and the inks
17 before it's paper, those are okay. But if the
18 paper is finished and then it's being further
19 processed into a pot, how do we deal with those?
20 In fact, this was a topic of training at the
21 Accredited Certifiers Association training back
22 in 2018, and the ACA is looking to build best

1 practices around this, because there's a lot that
2 goes into this listing, there's a lot of
3 different types.

4 In terms of virgin paper specifically,
5 so we're looking at that term in contrast to
6 recycled paper, because recycled is what's in the
7 listing. There's no definition for recycled. So
8 it's unclear whether that's limited just to paper
9 that's 100 percent recycled content coming out of
10 a commercial paper recycling facility, or is it
11 you have some cardboard boxes ready to go to the
12 dump, but instead you're using them on your -- as
13 mulch or something.

14 So recycled, repurposed, reused,
15 diverted from the waste stream, all of these
16 interpretations are currently being used in the
17 absence of a definition. And that -- I'll leave
18 it with that.

19 MR. CHAPMAN: Sue.

20 MS. BAIRD: Yes. I'm sorry. We've
21 heard overwhelmingly from stakeholders asking if
22 we could intercede for a grace period for

1 implementation for prohibiting paper pots, and I
2 know in your work you've reviewed a lot of this
3 stuff.

4 Do you have any specific instances
5 where there could be a prohibition by NOP, but
6 they've said oh yeah, but we're going to give you
7 a grace period to implement that?

8 MS. MIRENDA: Sure. On the first
9 point, I'll just confirm that the Organic Trade
10 Association in our written comments did support
11 an extension of this 2018 phase out period. So
12 that position is based on acknowledgment that we
13 feel there's a negligible impact on organic
14 integrity because synthetic paper with synthetic
15 processing aids and additives is already being
16 used in the organic system.

17 So this is really a question of
18 implementation of this deceptively complex of
19 listing of paper and the annotations that
20 surround it. And in terms of similar examples,
21 the one that first came to mind for me is -- this
22 is the handling example, but sodium and potassium

1 lactate.

2 So these are two individual
3 substances. The NOPs, they're not currently on
4 the National List, but they had been allowed
5 under an old interpretation that if you combine
6 two materials on the National List and you get a
7 third new one, sure use it.

8 Obviously, that is not an
9 interpretation is not is or should be used today.
10 So the NOP issued a memo saying these materials
11 need to be petitioned, they need to go on the
12 National List. This Board did review those
13 petitions, issued a recommendation to approve.
14 Rulemaking is still in progress, and throughout
15 this whole period certifiers are allowing these
16 materials.

17 So to me that's a good example because
18 there's differing interpretations. There's good
19 faith effort on behalf of the certifiers who do
20 their due diligence of reviewing these materials,
21 and instead of disrupting the marketplace for
22 certified operators that have been using these

1 approved materials by their certifiers, just sort
2 of let the process play out.

3 MR. CHAPMAN: Thank you. Emily.

4 MS. OAKLEY: After that comment, can
5 I have two, because now I wanted to ask Jenny
6 what her response to that might be, and if that
7 might provide a window for extending the grace
8 period.

9 DR. TUCKER: I am sensing a theme.
10 You know what I'll say is that we're going to
11 take the all the comments from this meeting back,
12 and I'll be providing an update to our senior
13 leadership on the key topics that came up in this
14 meeting. So I appreciate the comments.

15 MR. MORTENSEN: Just for the record,
16 could Jo restate those substances? I couldn't
17 make out what you said.

18 MS. MIRENDA: Sodium lactate and
19 potassium lactate.

20 MR. MORTENSEN: Thank you

21 MS. MIRENDA: And I believe they were
22 petitioned together, so there's one petition, one

1 recommendation.

2 MS. OAKLEY: So my actual question was
3 about reading materials. Thank you very much for
4 your detailed comments, and you expressed support
5 for the concept of using the wild crop standard
6 as a tool for trying to address the environmental
7 impact. I was wondering if you could elaborate
8 on that a bit.

9 MS. MIRENDA: Sure. So in our written
10 comments, we did support the logic of using our
11 existing organic certification system, very
12 strong, gold standard, to evaluate the
13 sustainable production of materials, including
14 that may end up being used in crop inputs,
15 because they align with the Organic Foods
16 Production Act criteria for the National List.

17 That being said, we still had
18 questions about what really is the problem we're
19 trying to solve in terms of potential
20 contamination and over-harvesting of marine
21 plants. We really wanted to have this Board and
22 the community have a better understanding of the

1 real problem, so that we're sure that whatever
2 solution is proposed will address that problem.

3 So with the difference, different
4 requirements for crops versus wild crops
5 standards, and given the lack of specificity in
6 the standards for marine agriculture
7 specifically, at this point we're not fully
8 convinced that this is the right solution.

9 We just have questions about it and
10 support continued work either through a working
11 group or an expert panel, bringing together other
12 stakeholders so we can really get an
13 understanding of this issue that we feel is
14 important.

15 MR. CHAPMAN: Steve.

16 MR. ELA: Coming back to paper pots,
17 we're wrestling in the Crop Subcommittee of how
18 to ask like for a technical report, so we're not
19 asking for approval of a product, but an ordinary
20 thing. So taking paper as a planting aid is a
21 great idea. How would you -- you know, does this
22 say we're going to allow any adhesive obviously

1 is not, I don't think, a door we want to open
2 because that's just ad hoc.

3 Do you have any suggestions of how we
4 should approach the whole adhesive issue, so that
5 it becomes something we can get a TR on,
6 something we can annotate? You know, I guess I'd
7 just appreciate your feedback on how we should
8 proceed, in your opinion.

9 MS. MIRENDA: Sure. So there has been
10 a lot of work done on newspaper and recycled
11 paper. There was just a full technical report
12 done last year, and goes into a lot of
13 information about the adhesives, the glues, the
14 inks, the dyes, the toners, the laundry list of
15 things that are used in paper manufacturing.

16 So consider that as a starting point
17 just to assess what's already been reviewed and
18 approved, and then finding your sliver scope of
19 something that could be used in a limited scope
20 technical report. That could be a way to balance
21 conducting a thorough technical review on the
22 unique aspects of these paper-based printing

1 aids, without slowing down the process to do
2 another full TR.

3 MR. ELA: I guess one of the issues
4 though like the TR on paper or on newspaper, you
5 know, it listed a few adhesives and then it kind
6 of goes "and many others." That's where, you
7 know, it's -- I mean we recognize there are many
8 others and some are proprietary, etcetera,
9 etcetera.

10 But in terms of allowing a use beyond
11 recycled paper given the issues there, I guess
12 we're still wrestling with if you try and approve
13 just a few adhesives, how do you -- how do you
14 know that? Kind of this could be a percentage,
15 or how do we wrap our hands around that whole
16 issue and contain it so it doesn't approve
17 something that just becomes, excuse, becomes
18 anything goes?

19 MS. MIRENDA: Well, the fact that the
20 technical reports lists a ton of materials, then
21 kind of goes on to say, you know, etcetera,
22 there's just a lot, gives you a sense that

1 there's already lots of synthetics being used in
2 paper that can be used as mulch directly on the
3 soil left to biodegrade.

4 So consider looking at what additional
5 risks might be involved with a paper pot. That
6 might have some adhesives which may or may not be
7 exactly what's already being used in paper,
8 regardless of whether you may be able to identify
9 those or not. But I'll stop there.

10 MR. CHAPMAN: Okay. Thank you for
11 your comments. We're going to have to stop
12 there.

13 MS. MIRENDA: Okay.

14 MR. CHAPMAN: Thank you. Up next is
15 Beth, followed by Sam Welsch. Beth, if you can
16 start with your name and affiliation.

17 MS. UNGER: Good morning. I'm Beth
18 Unger, Regulatory Engagement Manager at CROPP
19 Cooperative, and I want to thank you for the
20 opportunity to provide comment. I apologize that
21 I'm going to go over the same old ground you've
22 been hearing for the last two days, but you know,

1 there's a few things that I wanted to bring to
2 your attention.

3 So I'm focused on the Materials
4 Subcommittee genetic integrity transparency of
5 seed, the Crop Subcommittee's strengthening the
6 organic seed guidance, and the NOP process for
7 publishing information for the National Organic
8 Standards Board meeting.

9 First, the genetic transparency of
10 seed. A lot of thought and work went into the
11 proposal. There's a lot of things that we really
12 liked about it. Corn was the very right choice
13 to start off with as being the highest risk. The
14 GMO crops out there. Putting the burden on
15 producers using conventional seed to obtain test
16 results is a disincentive to use conventional
17 seed. So it's really accomplishing two things at
18 the same time.

19 Reporting results provides visibility
20 on contamination levels. It's something that
21 this committee has dealt with over the years, and
22 it's information that isn't widely available. So

1 we think that that's a great idea. We also like
2 the fact that the subcommittee included sampling
3 protocol, which is really a key element for
4 obtaining good data in the first place. The
5 proposal would have had added clarity of
6 organized in a manner to highlight the
7 responsibility by stakeholder.

8 It was a little bit confusing that
9 way, a little disconnect going on there. But and
10 we did have information on that in our written
11 comments that you could refer to. But overall,
12 we think that that was a very well thought-out
13 proposal.

14 Strengthening the organic seed
15 guidance. As stated in previous comments over
16 many years on this topic. CROPP supports the use
17 of organic seed through our own internal policy.
18 Although one can always improve on written
19 proposals, there were key elements in the
20 proposal the NOP can use to strengthen the
21 guidance document, and also regulatory. We
22 especially appreciate the recommendation to add

1 to the regulations at 205.204(a)(1)(i), requiring
2 improvement in the search, sourcing and use of
3 organic seed. We urge you to pass a proposal at
4 this meeting.

5 On the process, I'm going to be really
6 brief. We thought it would be a good idea. I
7 know that these proposals don't all come at one
8 time. If you would just get them through
9 clearance and posted as they become available, to
10 give us time to reach out to stakeholders to give
11 better and more thorough public comment. Thank
12 you.

13 MR. CHAPMAN: Thank you, Beth.

14 Harriet.

15 MS. BEHAR: So I'm going to ask on a
16 totally different. I hope you can answer. How
17 do you feel about putting on the work agenda
18 review of GMO vaccines and modifying the current
19 listing in the regulation about allowing excluded
20 vaccines, but only if they're listed? Or should
21 that be removed completely and just allow, or I
22 mean we probably should put it on the work

1 agenda. So that's my opinion.

2 I'm wondering if you think it should
3 stay as is, or should we work on this to clarify
4 that?

5 MS. UNGER: I believe that if you
6 worked on that, that would be consistent with
7 205.600.

8 MR. CHAPMAN: Ashley.

9 MS. SWAFFAR: I just want to clarify.
10 We did submit that as a work agenda request item.

11 MR. CHAPMAN: Thank you, Beth.

12 MS. UNGER: Thanks.

13 MR. CHAPMAN: Up next is Sam, followed
14 by Zea Sonnebend. Sam, give us your name and
15 affiliation.

16 MR. WELSCH: Yes. My name is Sam
17 Welsch. I'm with OneCert. First, I want to
18 discuss a couple of items on the National List.
19 I support removal of the microcrystalline cheese
20 wax, because it's not essential for mushroom
21 production, and it can often contain antibiotics.
22 I support the removal of sucrose octanoate esters

1 which are not being used, at least in the
2 beekeeping area, and because they're probably not
3 an effective treatment anyway.

4 Regarding the petition for pullulan,
5 I want to advise you to be careful of claims that
6 it can be certified organic. I've looked into
7 that for years in trying to track down those who
8 claim to have a certified organic pullulan, only
9 to find out when we ask questions that the
10 certifications are being surrendered or
11 suspended. There are currently no certified
12 organic pullulan on the Organic Integrity
13 Database.

14 I know there's aspects that prevent
15 compliance in manufacturing process, so be
16 careful about accepting claims without evidence.

17 Regarding inspector qualifications,
18 obviously I support high quality inspector
19 qualifications, but I do oppose the licensing of
20 inspectors, adding additional burdens there. We
21 already have an accreditation that requires
22 certifiers to have qualified staff, and it's not

1 limited to inspectors.

2 It includes our reviewers and others
3 making decisions about certification. I also
4 includes the NOP. So we need to look at all
5 levels to have consistency in quality, training,
6 education and I'm very pleased that NOP is
7 working on that to ask that in conjunction with
8 ACA, the Accredited Certifiers Association, which
9 is also working very actively in developing best
10 practices guidance for our members and others in
11 the industry.

12 I think adoption of those is key. One
13 example of an issue where we don't have
14 consistency and we need some guidance from the
15 NOP is recently we had found that somebody was
16 selling product that was not on the National
17 List, or they had -- or they had surrendered.
18 The previous certifier was telling our client who
19 was buying product from them that because they
20 had a contract that was issued before they
21 surrendered, they could still accept shipment of
22 product as organic from that now uncertified

1 operation.

2 That's contrary to what I think is the
3 general practice among certifiers. It turns out
4 upon further investigation that that previous
5 certifier had only initially inspected them one
6 time. They had never been audited, and it was
7 one of the operators who was, pled guilty to
8 fraud.

9 So they were getting permission from
10 a certifier to continue to ship organic product,
11 even after they had surrendered their
12 certification. We need guidance, instructions
13 from the NOP to make sure no certifier is telling
14 somebody when you're no longer certified you can
15 still ship organic product.

16 MR. CHAPMAN: Thank you. Questions
17 for Sam? Harriet.

18 MS. BEHAR: I'm unaware that the
19 microcrystalline cheese wax could contain
20 antibiotics. I'm not sure who's the lead on
21 that. Where did you -- since you mentioned that
22 we should always look for evidence if a claim is

1 being made, I'm just joking. But where did you
2 get that information, because that's very
3 interesting to me?

4 MR. WELSCH: That was on SDS sheets on
5 products that we were requested to approve for
6 use.

7 MS. BEHAR: So you actually saw an
8 MSDS?

9 MR. WELSCH: Yeah. That's a bit
10 dated. That was -- that was information we had
11 at the time it was initially listed so we knew it
12 was being done at that time.

13 MS. BEHAR: So we're talking probably
14 12 years ago or something like that?

15 MR. WELSCH: Yeah. So I'm not sure if
16 that still is current. We've never approved the
17 use of it. The people that wanted to went to
18 other certifiers.

19 MS. BEHAR: Well, I wonder if any
20 certifiers out there who are going to come up and
21 give public comment could help clarify if they're
22 still seeing that out there.

1 MR. CHAPMAN: All right. I've got
2 Steve and then Ashley.

3 MR. ELA: Sam, when you say you would
4 support delisting microcrystalline cheese wax, it
5 seemed like in the public comments there was some
6 -- it was unclear to me whether there were or
7 were not suitable alternatives. Some people said
8 there were, some people said there weren't. In
9 your experience are there alternatives for those
10 producers that do want to grow on logs?

11 MR. WELSCH: There seemed to be at the
12 time when we were initially looking at it.

13 MR. ELA: Would those be --
14 (Simultaneous speaking.)

15 MR. WELSCH: Yeah. I think there's
16 the ones that were listed, the soy waxes and
17 things.

18 MR. CHAPMAN: Ashley.

19 MS. SWAFFAR: Okay, a couple of very
20 different questions for you. The first one is
21 SOEs. As an international certifier, I'd kind of
22 like to get your scope on that. EPA doesn't have

1 a listing here in the U.S. for SOEs. Do you see
2 SOEs being used anywhere else around the world?
3 Do you certify bees at all?

4 MR. WELSCH: We do certify some
5 beekeeping, but mostly wild harvested areas.
6 We're not aware of anybody who's using it.

7 MS. SWAFFAR: Okay, and a follow-up
8 question. Since you didn't submit written
9 comments, my question is paper pots. What's your
10 stance on paper pots?

11 MR. WELSCH: Well, I don't want to be
12 too unpopular here, but we're one of the
13 certifiers who never approved them, and we're in
14 fact surprised that other certifiers had. We
15 looked at it because of when we asked for
16 information about what's in them, it was obvious
17 that they included synthetic adhesives and other
18 components that were not on the National List.

19 So you know, for consistency we've
20 also supported the extended period for pullulan
21 to continue to be allowed, even while it's being
22 petitioned. So I'm not going to speak in favor

1 or against the extension, but I do understand.
2 It's important to be consistent, and it's hard to
3 be consistent when you make different rules on
4 how popular the option is, rather than go back to
5 the rule.

6 I tend to look at what's in the rule,
7 what's in the law, what's in the regulations, and
8 say that's what we should be doing. It should be
9 extraordinary circumstances where we don't follow
10 that.

11 MR. CHAPMAN: Thank you, Sam. I think
12 that's it. Thank you. Up next is Zea, followed
13 by Phil LaRocca. If you could start with your
14 name and affiliation.

15 MS. SONNABEND: Greetings. I'm Zea
16 Sonnebend from CCOF and Fruitilicious Farm in
17 Watsonville, California. I'm a former member of
18 the NOSB in the scientist seat from 2012 to 2016.
19 I'm also one of the historical voices of NOSB,
20 having been to one of the very early NOSB
21 meetings here in Minneapolis in 1993 I believe,
22 so I know a lot about the past.

1 Anyway, we would like to comment about
2 strengthening the organic seed and the genetic
3 integrity of seed. CCOF supports the rule change
4 to 205.204. Certifiers really need something
5 that they can use to justify that growers are
6 continuing to improve in their organic seed
7 requirement.

8 So we fully support Gwendolyn's
9 position of at least pass that part of it, and
10 maybe take back the guidance portion for further
11 work.

12 On the genetic integrity of seed, we
13 support the proposal strongly, that there be seed
14 tags that have purity indications. We also very
15 strongly support the retaining of a sample of
16 seed, but we'd like it to be for 18 months
17 instead of 12 months because you don't usually
18 see a problem in the seed until you harvest the
19 crop that resulted from that seed several months
20 later.

21 And then at harvest if you find a
22 problem, it takes some time to do an

1 investigation and trace it back, and that might
2 take you through the next planting season. So 18
3 months would be better, and so that's our
4 position on that.

5 We strongly support the excluded
6 methods terminology which as you know we did a
7 lot of the work spearheading that effort, and
8 hope that work continues on that. I also just
9 want to say a few things about the change to the
10 inerts annotation, which I understand has fallen
11 off the table and is not being worked on, even
12 though the NOSB passed a recommendation.

13 There are two significant problems
14 that still remain. One is that this effort
15 started because the EPA came here and said they
16 did not want their old List 4 still mentioned in
17 the federal regulations. So they would really
18 like that to change. Just because they haven't
19 been back doesn't mean they don't still want it.

20 We worked with them for many years on
21 the Inerts Working Group trying to get that
22 changed, and we have a change they could agree

1 with and we could agree with so we want you to do
2 it. And second of all, because it's in limbo,
3 it's really inhibited new product development.

4 So all these potential tools that
5 organic farmers could be using aren't being
6 developed because don't know what to put in for
7 inerts, because they don't know what the
8 regulatory scheme is going to be.

9 So since the buzzer hasn't run, I will
10 also say that historically there is quite a bit
11 of precedent for grace periods and different
12 practices that come into effect. CCOF does not
13 have a position on paper pots. We also have
14 never allowed them.

15 But personally, I would just like to
16 point to the biggest grace period that happened
17 in the past was when the inerts policy first came
18 into effect it was quite a radical change from
19 what was being done, and an 18 month period was
20 given for inerts to come into compliance with the
21 federal rule.

22 Eighteen months so that the EPA could

1 take another -- reclassify some manufacturers to
2 reformulate, et cetera. Thank you.

3 MR. CHAPMAN: Thank you, Zea.

4 Questions for Zea? Harriet.

5 MS. BEHAR: For the farmers retaining
6 samples under the genetic integrity, do you feel
7 we need to give a little bit more direction
8 besides the 18 months on how to keep samples?

9 MR. SONNABEND: I think that easily
10 could be done, and certifier training would be a
11 good place to do it, and then certifiers can tell
12 people. It's as simple as putting some seed in a
13 mason jar, putting a label on it saying the
14 variety and the date you put it aside. And you
15 know, really very simple. It doesn't have to be
16 an involved thing.

17 MR. CHAPMAN: Thank you, Zea. Thank
18 you. Up next is Phil, followed by David
19 Wallinga.

20 MR. LaROCCA: Good morning. My name
21 is Phil LaRocca. I am the owner and winemaker of
22 LaRocca Vineyards. I also sit as the Chairman of

1 the Board of Directors for CCOF and I am here to
2 actually speak for some of our certified organic
3 dairy producers in California. Jenny, thank you
4 because you covered some of the issues that I'm
5 going to deal with here.

6 First of all, I will say we are one of
7 the rare bodies that actually asked for
8 regulations, and there's a reason for that. It's
9 these strict regulations that make us who we are.
10 It also gives us a place, standing in the
11 marketplace. Organic stands out. It is felt by
12 some of our dairy producers that they are
13 following the rule to where it should be, and
14 this is what we are asking you, to make sure that
15 the organic livestock and dairy standards are
16 followed through the fullest, highest degree of
17 precision.

18 It is felt that some of our producers
19 are doing this, and by so doing are being
20 discriminated a little bit in the marketplace by
21 other growers that may not be following the
22 practices. I'm not a dairy producer. I make

1 wines, so I'm doing my best to help some of our
2 growers out.

3 But I'd also like to carry these
4 statements and make them ditto onto egg and
5 poultry production as well. Now this is my area
6 here that's concerning me always, and that's
7 drift. Drift is a problem that the organic
8 community has faced on and on. We just recently
9 had an issue where an organic peach grower was
10 drifted upon.

11 Fortunately, his neighbor was a
12 friend, a conventional grower who had insurance
13 and was able to cover his crop because his crop
14 was fully lost, and now he's going through the
15 period of trying to regain his organic
16 certification again.

17 What I would like to see happen is
18 some form of government crop insurance, whether
19 it be through the NAP program, where certified
20 organic growers are protected from drift, whether
21 it be pesticide, herbicide, fungicide or genetic
22 drift.

1 On that same topic, it was brought up
2 to me yesterday that we're going to have areas
3 that have been affected by the flood and the
4 hurricanes, and they are probably going to be
5 dusted with some heavy chemicals for mosquitos.

6 So this Board should be aware that
7 something's going to take place there, and that
8 there may be some organic farms involved, so what
9 are we going to do about it. On the last note, I
10 want to say that I'm very grateful to be in this
11 room, because I consider some extremely brilliant
12 minds to be here.

13 We're all here for a great purpose and
14 that is to grow healthy food and make this world
15 a better place. I realize that if we all thought
16 the same it would probably be pretty boring. But
17 at the same time, we have to remember let's have
18 our differences but also what we are trying to
19 accomplish we'd like to see at CCOF.

20 Let's make organic the norm, that we
21 all need to work together. We are only one
22 percent of agriculture, and to gain into that

1 percentile we need to work together and respect
2 each other. So thank you.

3 MR. CHAPMAN: Thank you, Phil.
4 Harriet.

5 MS. BEHAR: This actually is more of
6 a question for Jenny and Paul. I know when Miles
7 was the deputy administrator, we were -- there
8 was guidance on drift actually listed as an item
9 that the National Organic Program was working on.
10 I live in the Upper Midwest and drift is a very
11 large issue for us.

12 And I don't know at one point at just
13 stopped appearing on the list, with no
14 explanation. So I'm wondering if there is
15 anything happening within -- the NOSB never saw
16 what Miles was working on, neither did the
17 public, and I think that's an issue. I'm just
18 curious what's going on with that.

19 DR. TUCKER: Yeah. That's a good, a
20 good question. Can you hear me, yeah? A good
21 question and I appreciate your asking about the
22 status of that. There was, and it was talked

1 about I think during a couple of meetings a while
2 ago, the possibility of looking at drift. I
3 think it was in the form of guidance at the time.

4 And that, that document was
5 distributed within, within USDA, and there were a
6 lot of very, very good questions about it that
7 sort of sent us back to really being, consider
8 all the different variables that were associated
9 with it. So the document has not moved forward
10 since then because the complexity of this is
11 really enormous.

12 So that continues to be addressed on
13 an operation-specific basis with certifiers. But
14 at this time, that guidance is not active on our
15 work agenda.

16 MR. LaROCCA: Our comment. In
17 California, we're trying to work on that. But it
18 always seems that the fellow or person who has
19 drifted was the guilty party. We need to reverse
20 that. It's kind of like we're guilty until we
21 prove ourselves innocent, and it shouldn't be
22 like that. If you're drifted and your whole

1 livelihood is at stake, we should have some
2 backing by either state or federal government to
3 come in and say we're the innocent party here and
4 we need to be covered, and we're not really
5 seeing that.

6 MR. CHAPMAN: Thank you, thank you.

7 MR. LaROCCA: Yeah, thank you.

8 MR. CHAPMAN: Asa? Phil, sorry. We
9 still have a question for you.

10 MR. BRADMAN: So just one follow-up
11 question. Do you have a database or is there any
12 central repository of information on the number
13 of drift incidents and who is affected and what
14 crops and the monetary loss?

15 MR. LaROCCA: I don't have that with
16 me now, but I bet we have some of that at CCOF.

17 MR. BRADMAN: If you could submit
18 something like that, that would be great.

19 MR. LaROCCA: Okay, thank you. That
20 was the national database on that Asa that Purdue
21 University keeps, that have 4.5 million acres of
22 arable crop land was drifted on last summer, for

1 example, by specific compounds.

2 MR. BRADMAN: But that's not
3 necessarily just organic though.

4 MR. LaROCCA: You can break it down to
5 organic and conventional.

6 MR. BRADMAN: Okay great, thanks.

7 MR. CHAPMAN: Okay. Next up is David,
8 followed by Glenn Kern. David, if you could
9 start with your name and affiliation.

10 MR. WALLINGA: Good afternoon. My
11 name's David Wallinga. I'm a physician and
12 Senior Health Officer at the Natural Resources
13 Defense Council, which uses science and public
14 health and advocacy to protect public health and
15 the environment.

16 So I am here to talk about the use of
17 human antibiotics in organic poultry production,
18 and how it bears on public health as well as
19 consumer understanding of the organic label.
20 Consistently, polling shows that U.S. consumers
21 want meat and poultry products raised with fewer
22 or no antibiotics, and most consumers do so under

1 the impression that buying those products is
2 important for their own health and the health of
3 their families and it is.

4 The CDC and the World Health
5 Organization, for example, among other leading
6 health authorities, agree that using antibiotics
7 in food animal production ultimately increases
8 the spread of antibiotic resistance that's now
9 epidemic, and that poses a rising threat to all
10 of us here.

11 So many consumers therefore seek out
12 approved labels such as organic or raised without
13 antibiotics because they think it means zero
14 antibiotics used, and in a case of raised without
15 antibiotics they would be right. But
16 unfortunately that's not true of the USDA
17 approved organic label.

18 When its own label fails to meet
19 consumer concerns or understanding, that's a
20 problem that the USDA should and needs to
21 address. So specifically NRDC urges the USDA to
22 support this Board's request for its work plan to

1 include a prohibition on use of antibiotics in
2 organic agriculture without exception. This
3 would include, for example, the current practice
4 of routinely injecting gentamicin and
5 aminoglycoside antibiotic by hatcheries into
6 their eggs just before the chicks hatch.

7 Gentamicin is an important human drug
8 that's injected into very sick patients when
9 other drugs don't work. Among other things, for
10 example, it's used in newborns who have life-
11 threatening meningitis, sepsis or other systemic
12 infections. It's also used in adults.

13 I suspect most consumers would be
14 surprised to learn to gentamicin is routinely
15 used in organic chicken production. When they do
16 learn it, I think it would conflict with their
17 common understanding of what a USDA organic label
18 represents. The current exemption allows for
19 antibiotic use in production before chicks turn
20 two days old, and that exemption dates back to
21 1990 when the OFPA was passed.

22 At that point, day-old chicks never

1 having been given antibiotics were unavailable.
2 But that was a generation ago, almost 30 years,
3 and we're in a different era now. Now they are
4 freely available. I would point to written
5 comments from both the National Organic Coalition
6 as well as Consumer Reports that make clear that
7 this exemption is no longer necessary and in fact
8 would be easy to fix.

9 So in summation, I urge the USDA to
10 reconsider its denial of the Livestock
11 Subcommittee's request to add this issue to its
12 work plan. Thank you.

13 MR. CHAPMAN: Thank you. Ashley.

14 MS. SWAFFAR: Yeah. What data do you
15 have that suggests that antibiotics are routinely
16 used in organic poultry?

17 MR. WALLINGA: Well in the U.S., we
18 don't actually collect data on usage by species
19 or on the farm. So USDA has been consistently
20 been asked to do so by advocates like myself.
21 The General Accounting Office has consistently
22 recommended it as well, but we still do not

1 collect on farm use data.

2 So we can't answer that question.

3 However, when extension agencies, for example, or
4 other publications talk about the use in poultry
5 production, that's listed as a common use. In
6 addition, we know from Public Health Canada
7 having done a study several years ago, looking at
8 hatchery production in Quebec, that it was almost
9 uniformly used at that point.

10 MS. SWAFFAR: In a different country.

11 MR. WALLINGA: In a different country,
12 right.

13 MS. SWAFFAR: Not in the U.S., in the
14 U.S.

15 MR. WALLINGA: Not in the U.S.,
16 because again in the U.S. we don't actually track
17 antibiotic use at the farm. So we're a little
18 bit in the dark.

19 MS. SWAFFAR: Yeah, so I'm sorry.
20 This is as a member of the poultry industry for a
21 lot of years, I know that it's not a routinely
22 used thing in especially the egg industry. So

1 that's --

2 MR. WALLINGA: I hope that's the case
3 and with -- if the NOSB were able to put that in
4 their work plan, maybe that's a fact that they
5 could establish.

6 MS. SWAFFAR: Yeah, and my other
7 follow-up to your suggestion on asking the NOP to
8 let us work on that. I think that it needs to be
9 elevated probably to the Secretary's level. So
10 those comments need to be directly written in and
11 lobbied to the Secretary level.

12 MR. WALLINGA: Okay, thank you.

13 MR. CHAPMAN: Rick.

14 DR. GREENWOOD: Yeah. I have a
15 question. Do you have any data about the
16 survival of for instance gentamicin, which is a
17 protein after cooking? My thought is that if you
18 cook an egg or you cook meat that has antibiotic,
19 does it survive? So is it at that level not a
20 risk anymore for resistance?

21 MR. WALLINGA: Right. I mean it's a
22 common misconception that what we're talking

1 about is residues of antibiotics in the meat or
2 in the food product. That's not the issue. The
3 issue is that when you expose the bacteria in the
4 egg or in the animal to an antibiotic, that it in
5 fact spurs resistant bacteria to form and then
6 spread.

7 So we do know that from the NARMS
8 program that there are routinely antibiotic-
9 resistant bacteria on food products where
10 antibiotics are routinely used. So that's true
11 for chicken as well as other species.

12 DR. GREENWOOD: I get that part of it.
13 I'm thinking of a human gut changing to flora and
14 developing resistance in an individual.

15 MR. WALLINGA: Well, you can get human
16 gut flora changing by being exposed to antibiotic
17 resistance bacteria on the meat or other food
18 products that they eat, because those bacteria
19 can transfer their resistance genes onto other
20 bacteria in the human gut.

21 DR. GREENWOOD: No, I know that.

22 MR. WALLINGA: Yeah.

1 DR. GREENWOOD: I'm just thinking
2 about a source, and I think there's too much
3 antibiotics. I mean don't get me wrong, but I'm
4 just thinking how much of that survives cooking
5 for exposure to individuals. I've never seen any
6 data for it, but it seems they won't survive
7 cooking.

8 MR. WALLINGA: I don't know of that
9 data. But again in my own personal opinion,
10 that's a little bit of a distraction from the
11 other issue that I'm talking about, which is the
12 resistance among the bacteria that we know are on
13 food.

14 DR. GREENWOOD: Thank you.

15 MR. CHAPMAN: Thank you. Asa, do you
16 have something briefly?

17 MR. BRADMAN: Just very briefly. I
18 just want to thank you for your comments. I'm a
19 public health person. It's an issue that's
20 worldwide and of concern to a lot of people
21 concerned about health. So I think it's
22 important that you raised this. Thank you.

1 MR. WALLINGA: Thanks.

2 MR. CHAPMAN: Thank you. Up next is
3 Glenn Kern, followed by Peter Nell. Glenn, if
4 you can start with your name and affiliation.

5 MR. KERN: My name --

6 MR. CHAPMAN: Thank you for your
7 comments here today.

8 (Laughter.)

9 MR. KERN: That's it. My name is
10 Glenn Kern, and I'm offering these comments on
11 behalf of the Carolina Farm Stewardship
12 Association or CFSA for short. CFSA works in a
13 variety of ways to expand the footprint of
14 organic farming in the Carolinas. A crucial
15 component of this work is supporting conventional
16 farmers who transition to organic production of
17 our region's most reliable crops.

18 Many of these farmers have become
19 important voices in support of transforming
20 agriculture in the Carolinas to a more
21 sustainable model. This is a transformation that
22 is urgently needed. The CAFOs and chemical-

1 dependent crop farms that dominate the coastal
2 regions of the Carolinas present unacceptable
3 risks to human health and the environment, in the
4 context of a changing climate.

5 Severe flooding like that caused by
6 Hurricane Florence last month is predicted to
7 become more common and with it, the risk of
8 contamination for nearby communities and
9 ecosystems. Organic management is a way for
10 conventional farms in the coastal regions of the
11 Carolinas to adapt to the risks of climate
12 change.

13 CFSA is in favor of farmers growing
14 organic sweet potatoes, soybeans, corn, wheat,
15 vegetable and yes, organic tobacco, if this
16 valuable crop is what they choose to grow in
17 order to stay afloat. Indeed, more than half of
18 all certified organic crop farms in North
19 Carolina have made the choice to grow organic
20 tobacco as part of their rotations.

21 Yet organic tobacco may soon be lost
22 to farmers in the Carolinas. At the NOSB meeting

1 in Jacksonville, this Board considered a petition
2 to add fatty alcohols to the National List for
3 use as a sucker control agent in tobacco. This
4 substance had been allowed by some certifiers for
5 years based on the determination that it was a
6 non-synthetic.

7 However, the Board classified fatty
8 alcohols as a synthetic and then did not
9 recommend it for addition to the National List.

10 Regrettably, not a single grower of organic
11 tobacco was heard from at that meeting. Without
12 the use of fatty alcohols, many farmers who grow
13 organic tobacco will have to abandon this crop
14 and perhaps organic certification altogether.

15 Organic tobacco accounts for nearly 50
16 percent of all organic crop sales in the
17 Carolinas, and there is every reason to think
18 that the loss of this lucrative market will be
19 more devastating to our organic farmers than the
20 thousand year flood they experienced last month.

21 It's our understanding that a revised
22 petition for fatty alcohols has been filed. If

1 and when the NOSB reviews this revised petition,
2 you will hear from organic farmers in the
3 Carolinas who grow tobacco. CFSA will make sure
4 of that. I thank you for all the work you do on
5 behalf of organic agriculture and for your
6 consideration of these comments. I'm happy to
7 try to answer any questions you may have.

8 MR. CHAPMAN: Emily.

9 MS. OAKLEY: Thank you for your
10 comments. In the absence of fatty alcohols, what
11 are organic producers using right now?

12 MR. KERN: That's a good question. I
13 am -- I have spoken to some farmers and they have
14 said that they are -- that mineral oil and
15 soybean oil do not work. I have also heard third
16 hand that some certifiers are continuing to allow
17 the use of fatty alcohols, but that -- that's not
18 something I can speak to directly.

19 MR. CHAPMAN: Thank you. Up next is
20 Peter, followed by Kate Mendenhall. Peter, if
21 you can start with your name and affiliation.

22 MR. NELL: Hello. My name is Peter

1 Nell, and I'm a policy specialist with CCOF.
2 Today, I'll be commenting on the Materials
3 Subcommittee's discussion document on marine
4 materials and the 2020 sunset review of elemental
5 sulfur.

6 CCOF, as you might know, is a non-
7 profit organization governed by the people who
8 grow and make our food. We certify over 3,000
9 operations in 44 states and three countries.

10 CCOF shares the concern that marine materials are
11 under threat of over-harvesting habitat
12 degradation and destruction.

13 However, CCOF does not support
14 requiring organic certification of marine
15 materials to the wild crop standards. CCOF does
16 not certify marine materials, and the discussion
17 document notes that certifiers that do have
18 difficulty adapting the National Organic
19 Standards to aquatic systems.

20 The Board should establish a working
21 group to determine the feasibility of integrating
22 -- of integrating fishery certification,

1 sustainability verifications or attestations for
2 all ocean source inputs, seaweeds, fish products,
3 et cetera into the National Organic Standards.

4 We recommend that the Board determine
5 a phase-in goal that all marine materials be
6 sourced from third party verified and/or
7 certified sustainable fisheries within ten years.
8 Obviously we understand the complexity of this
9 issue.

10 Additionally, organic claims on input
11 products are currently outside the scope of NOP
12 enforcement. Therefore, it would be difficult
13 for certifiers to verify input compliance to the
14 wild crop standards.

15 Regarding elemental sulfur, over 1,000
16 CCOF members list the substance on their OSP.
17 Some list both dusting and wettable sulfur
18 products, and use them in a wide variety of crops
19 for pest and disease control, and also for soil
20 fertility. CCOF encourages our members to
21 comment, but they don't always have the capacity
22 to directly submit their own comments.

1 In this case, we direct -- we
2 conducted direct outreach to our members that
3 list elemental sulfur on their OSPs. Some of
4 them did submit written comments, and in many
5 cases they responded to us and I included that
6 comment, their comments in our written comments.

7 Given the importance of elemental
8 sulfur to many organic producers, NOSB should
9 carefully consider whether additional safety
10 precautions or limitations should be required for
11 its use. Thanks for your time.

12 MR. CHAPMAN: Thank you. Emily.

13 MS. OAKLEY: Thank you for your
14 comments on marine materials. I know that you've
15 stated also in your written comments that you're
16 concerned that this would be difficult for
17 certifiers to verify. If we were requiring that
18 the ingredients, the marine macroalgae itself
19 were to be certified to the wild crop standard,
20 what's your concern there if they were to have a
21 certificate and then would also be on the Organic
22 Integrity Database for that product?

1 I'm not totally sure how that's
2 different from verification of other materials,
3 other naturals that we have right now.

4 MR. NELL: Sure. I think our
5 assumption was that the entire product was to be
6 certified. However, yesterday at the NOC meeting
7 you did mention that it was going to be a single
8 ingredient. I'm happy to talk with our team and
9 discuss that further. But at this time, I'm not
10 sure.

11 MS. OAKLEY: If you do discuss that
12 with your team and you have further thoughts, if
13 you'd post those to the open docket that would be
14 really helpful.

15 MR. NELL: Absolutely. Thanks Emily.

16 MR. CHAPMAN: Thank you Peter.

17 MR. NELL: Thanks.

18 MR. CHAPMAN: Up next is Kate,
19 followed by Michelle Smolarski. Sorry if I
20 butchered that Michelle. Kate, if you could
21 start with your name and affiliation.

22 MS. MENDENHALL: Thank you. Thank you

1 members of the National Organic Standards Board
2 for the opportunity to speak before you today.
3 My name is Kate Mendenhall. I'm the Director of
4 the Organic Farmers Association, and I'm also an
5 organic farmer in Iowa.

6 The Organic Farmers Association was
7 founded in 2016 as a national grassroots
8 membership organization that provides a strong
9 and unified national voice for domestic certified
10 organic producers.

11 Organic Farmers Association works to
12 build and support a farmer-led national organic
13 farmer movement, and national policy platform by
14 developing and advocating policies that benefit
15 organic farmers, strengthening and supporting the
16 capacity of organic farmers and farm
17 organizations, and supporting collaboration and
18 leadership among organic farmer organizations.

19 What sets us apart is that we are
20 farmer-led and farmer-controlled. Only certified
21 organic farmers drive our policy positions. All
22 domestic certified organic farmers are invited

1 annually to submit policy priorities, which are
2 then vetted by an elected policy committee of
3 certified organic farmers.

4 OFA organic farm members vet these
5 policies and then vote on them, following our
6 restrict one farm-one vote policy, where all
7 farmers have an equal seat at the table. Our
8 membership and network of certified organic
9 farmers is diverse and spans across all 50 states
10 and U.S. territories.

11 Organic Farmers Association greatly
12 supports the work and role of the NOSB in
13 maintaining the integrity of the USDA organic
14 label. We urge the NOP to complete its work on
15 the NOSB recommendations that remain in the
16 status of outstanding and in process. Farmers
17 and consumers trust and rely on the NOP enacting
18 the NOSB recommendations in a timely and
19 transparent manner, and we ask that you make this
20 a priority for 2019.

21 We urge the NOP to issue guidance
22 based on the 2015 proposed origin of livestock

1 rule and publish a final rule in 2019; to put
2 more resources and attention into pasture rule
3 compliance; to implement the organic livestock
4 and poultry practices rule; to stand by the 2010
5 NOSB vote and recommendation to not allow
6 certified organic hydroponics; and to immediately
7 stop labeling and material listing as invalid
8 listing, as no definition nor explanation of
9 procedures for determination and management for
10 the term exists.

11 We submitted a number of specific
12 recommendations in our written comments. Most
13 notably, our national farm membership has
14 prioritized organic integrity as their number one
15 concern. This is directed at both domestic
16 integrity, with consistent enforcement of the
17 pasture rule specifically, but all organic
18 standards nationally across region, farm size and
19 certifier.

20 Also import integrity is essential.
21 We must act more swiftly and effectively to
22 protect American organic farmers against import

1 fraud. Thank you for the opportunity to address
2 you today.

3 MR. CHAPMAN: Thank you. Questions,
4 Emily?

5 MS. OAKLEY: I just wanted to say
6 thank you for being here. It's really nice to
7 have a farmer organization at the table
8 representing farmers.

9 MS. MENDENHALL: Thank you.

10 MR. CHAPMAN: Harriet.

11 MS. BEHAR: In the positions that
12 you've put in your written comments, were they
13 split positions or was it a pretty universal
14 agreement on those items?

15 MS. MENDENHALL: We have a pretty
16 strict policy for how our policy positions come
17 forward. We are split up into six regions
18 nationally, and so for any policy position to be
19 accepted, it has to go -- it has to receive
20 national support of 60 percent, and then it also
21 has to receive two-thirds of the regions also
22 showing 60 percent.

1 In our last year, we just started in
2 2016, so we've only been through one round of
3 annual policy resolutions. But all of our
4 policies pass, I believe, are over 80 percent
5 nationally and in each region. So we're quite
6 united as a national farmer voice, and that was
7 really I think comforting and exciting to see in
8 this first year.

9 MR. CHAPMAN: Thank you. Thank you
10 for your comments.

11 MS. MENDENHALL: Thank you.

12 MR. CHAPMAN: Up next is Michelle,
13 followed by Tom Harding.

14 MS. SMOLARSKI: Good afternoon. My
15 name is Michelle Smolarski, and I work with the
16 International Food Additives Council, an
17 association representing manufacturers of food
18 ingredients. IFAC supports the Handling
19 Subcommittee's recommendations to relist several
20 sunset review substances, and we thank the Board
21 for the opportunity to provide comments today.

22 IFAC strongly supports the

1 subcommittee's recommendation to retain xanthan
2 gum on the National List. Xanthan gum
3 contributes unique thickening, stabilizing,
4 emulsifying and texturizing attributes to foods
5 and beverages, and is widely used in foods for
6 populations with allergies and celiac disease,
7 including gluten-free products.

8 Production of xanthan gum does not
9 harm the environment, and aligns with organic
10 principles, as it relies on a natural process
11 with no harmful metabolites or byproducts. In
12 addition, since xanthan gum is produced through
13 the natural process of bacterial growth, IFAC
14 believes it more appropriately fits the
15 description of a non-synthetic, and suggests the
16 NOSB consider moving xanthan gum to 205.605(a).

17 IFAC also supports the subcommittee's
18 recommendation to relist gellan gum. Gellan gum
19 is also produced for bacterial fermentation and
20 provides the organic industry with unique
21 stabilizing and thickening properties needed for
22 a variety of applications, including suspending

1 important nutrients in foods and beverages, in
2 fortified beverages.

3 Furthermore, gellan gum provides the
4 organic community with a gel source suitable for
5 vegetarians and those with cultural or religious
6 dietary restrictions. In addition, IFAC strongly
7 supports the relisting of lecithin de-oiled at
8 205.606. De-oiled lecithin has a unique
9 functionality higher than that of powdered
10 lecithin, and is commonly used in oil and water
11 emulsions.

12 De-oiled lecithin provided to the
13 organic industry by IFAC members does not contain
14 modified proteins and is fully compliant with the
15 prohibited use of any ingredients derived from
16 genetic engineering in organic foods.

17 Finally, IFAC would like to express
18 our support for these subcommittee's
19 recommendation to retain gum arabic, locust bean
20 gum, carob bean gum and guar gum on the National
21 List. Gum arabic is used worldwide as an
22 emulsifier in common foods like granola bars and

1 salad dressings, allowing these products to be
2 shelf stable and therefore more accessible. It's
3 also used to impart texture and thicken foods.

4 Carob bean gum, also known as locust
5 bean gum, delays ice crystal formation and is
6 used as a stabilizer, thickener and fat replacer,
7 as well as an adjunct gelling agent and
8 texturizer to other hydrocolloids in dairy
9 deserts, baked goods and dressings and sauces.

10 Guar gum is preferred due to its
11 superior water binding and viscosity abilities
12 that are not replicated by organic alternatives.
13 Because of guar gum's unique technical
14 attributes, it keeps frozen dairy products
15 consistent through freeze-thaw cycles from
16 manufacturer to consumption.

17 In closing, we would also like to
18 express our strong support for relisting
19 alginate, mono and diglycerides, magnesium
20 stearate, phosphoric acid and tragacanth gum.
21 Thank you for the opportunity to comment.

22 MR. CHAPMAN: Thank you. Questions,

1 Harriet.

2 MS. BEHAR: Has anyone looked into
3 possibly producing in the like the locust bean
4 gum or the carob bean gum as an organic product?

5 MS. SMOLARSKI: Unfortunately I am
6 not a technical expert. I know that there has
7 been -- at this point, I don't -- I'm not able to
8 phone a friend. I cannot call on our technical
9 experts in our membership. But I'm happy to
10 follow up to provide some more historic
11 information.

12 MS. BEHAR: And submit something to
13 the docket. We would like to see that.

14 MS. SMOLARSKI: Yeah.

15 MR. CHAPMAN: Thank you. Up next we
16 have Tom Harding and I think we will break there
17 then for lunch. So Tom, you could start with the
18 name and affiliation.

19 MR. HARDING: Thank you. Tom Harding.
20 I'm here representing Green Ag Supply as a
21 consultant. First of all, I want to thank you
22 all for the good work that you continue to do,

1 not that it's easy. I'm here representing Green
2 Ag Supply, who petitioned fatty alcohols for the
3 use on organic corps, specifically organic
4 tobacco crops.

5 We have taken the recommendations of
6 the NOP, the NOSB and the Subcommittee and others
7 who have been very involved, and we have
8 submitted a new and revised petition to the NOP
9 for the use of fatty alcohols on organic tobacco
10 crops. It contains much new and additional
11 technical information, field trials, et cetera,
12 material trials. Hopefully it will be
13 considered, reviewed, received and final approval
14 for the National List.

15 If we can be of assistance in any way,
16 our scientists, our farmers will be ready to
17 answer of the additional questions you may have,
18 and we hope that they will be all be here when
19 this final review. Once again, we want to
20 encourage the Board to put on its work list the
21 materials appeals process.

22 I know that you have a lot on your

1 work agenda already, but I think it would save a
2 lot of time and money if we had an appeals
3 process, versus having to go back through the
4 whole resubmission. Separately from Green Ag
5 Supply, I want to speak on behalf of the term the
6 gold standard, which is the National Organic
7 Standards Program, the NOP, the OFPA were as
8 organic as it is regulated within 205, that it is
9 the gold standard.

10 We have to be very careful. I've
11 participated in a number of panels in the last
12 few months, and I see all kinds of programs
13 coming out even using the term organic within the
14 framework of their name, or in some parts of
15 their work.

16 I'm not against any of those things.
17 I think we must do everything possible to make
18 and keep the NOP legal standards the gold
19 standards, which can include incrementally
20 improving these standards through the process
21 established within OFPA.

22 It does us no good to argue about

1 these points, but it's most important that we
2 protect the term "organic." I think we have to
3 be very careful. When over 75 percent of the
4 current marketplace recognizes the USDA organic
5 seal, it's really important that we must legally
6 protect and value the word "organic."

7 I can tell you that without this
8 protection, we will have a confused marketplace
9 which continues to have to some degree a lot of
10 confusion right now. I want to thank you all
11 very much.

12 I want us to work together on behalf
13 of the term "organic," and I want to remember one
14 thing. NOP organic standards are the gold
15 standards. I thank you very much.

16 MR. CHAPMAN: Thank you. Questions
17 for Tom. Emily.

18 MS. OAKLEY: Thank you for your
19 comments. I wanted to ask you the same question
20 that I asked Mr. Kern. In the absence of fatty
21 alcohols, what are organic producers using right
22 now for sucker control?

1 MR. HARDING: Well, we just came
2 through a whole series of field trials this
3 season, and they have tried mineral oils. They
4 were doing soybean oils. They were doing peanut
5 oils, a number of things, all of them trying
6 them. The problem with that is they don't work.
7 It's a significant amount of additional labor.

8 Almost all of it has to be done, to
9 some extent I should say, by hand. It exposes
10 them to green tobacco disease, the workers. It's
11 a health and wellness issue as well. So frankly
12 we're not using anything that really does a good
13 job. There are a number of competitive products
14 on the market that use similar processes.

15 But we know that fatty alcohols work.
16 We've had a debate about that. For years, it was
17 recognized as a natural product by the detergents
18 industry and also the cosmetics industry. It's
19 derived from palm kernel. It's a natural oil.
20 Where we lose the whole issue and drift over into
21 the synthetic side is in the fractionation, the
22 esterification process. So we haven't found

1 anything that works like it.

2 MR. CHAPMAN: Dave.

3 MR. MORTENSEN: Yeah Tom, just so that
4 we're clear, because we spent a lot of time
5 discussing this and working through this, the
6 fatty alcohols are used effectively as a growth
7 regulator clipping chemical.

8 MR. HARDING: Specifically sucker
9 control.

10 MR. MORTENSEN: Right, right, and so
11 in the absence of the chemical and it sounds like
12 these other compounds are not working in field
13 trials, it would be done by hand as it used to be
14 done before the growth regulators were used, is
15 that right?

16 MR. HARDING: Yes, and at that time we
17 were a little less than 25 percent of the
18 marketplace. We're now substantially grown since
19 then. We'll probably lose 50 to 60 percent of
20 our organic growers. The trouble with that is we
21 also lose the sweet potatoes. We also lose many
22 other crops that are grown organically.

1 So we would have a reduction for sure
2 in growers, because most of them are pretty
3 sophisticated today, small, medium and large.
4 They use machines wherever they can.

5 MR. CHAPMAN: Emily.

6 MR. MORTENSEN: Thanks.

7 MS. OAKLEY: So I'm just unclear. I
8 don't want to belabor this, but are people still
9 using fatty alcohols right now?

10 MR. HARDING: Well of course right now
11 we don't need them anymore. But at the point,
12 yes. We have certifiers arguing about that
13 point. One of them approved them on the basis of
14 natural.

15 We go through the whole petition
16 process with him, and there's a debate going on.
17 Of course, that's why we came to petition the
18 Board, so we could get all of that behind us, and
19 really make sure our growers are within the
20 system and the framework it is.

21 MR. CHAPMAN: Thank you, Tom.

22 MR. HARDING: Thank you.

1 MR. CHAPMAN: Okay. It is 1:02 right
2 now. We are going to take just an hour break for
3 lunch. So we'll be reconvening at two o'clock
4 sharp. So folks know, the first two people up
5 after break are Peggy Miars and then Mark Kastel.
6 We are in recess.

7 (Whereupon, the above-entitled matter
8 went off the record at 1:02 p.m. until 2:05 p.m.)

9 MR. CHAPMAN: All right. If Board
10 members can take their seat. Members of the
11 public could take their seat, we're about to get
12 started. Okay. The majority of the Board is
13 present, as well as the DFO, and so we will come
14 back into order and proceed with public comment.

15 Up first is Peggy Miars, followed by
16 Mark Kastel. Peggy, if you can start with your
17 name and affiliation for the record.

18 MS. MIARS: Good afternoon. I'm Peggy
19 Miars, Executive Director of OMRI, the Organic
20 Materials Review Institute. I missed the last
21 two NOSB meetings due to travel commitments, but
22 I understand at the spring meeting this year that

1 some disparaging remarks were made about OMRI
2 during public comments.

3 So I'm going to start by repeating
4 some of the comments I made at the April 2016
5 meeting, where I explained OMRI's role in the
6 organic community. At that time, an NOSB
7 training presentation was posted on the website,
8 and on the screen I have a slide from that
9 presentation.

10 But there is a piece missing, and
11 there still is. Okay. OMRI is an important
12 stakeholder in the organic community. The NOP,
13 in its interim instruction for material review,
14 allows certifiers to consult with OMRI, and we
15 have worked on technical reports. OMRI has
16 provided information and assistance to NOSB
17 members whenever requested, and we provide
18 comments during meetings to assist the organic
19 community.

20 Certifiers subscribe to OMRI to
21 receive technical assistance, and they rely on
22 OMRI product decisions. Certified operations

1 also rely on the OMRI products list when sourcing
2 inputs for which the certifier has final
3 approval. Consumers rely on the OMRI listed seal
4 when they choose products at their home and
5 garden retailers.

6 So you'll see OMRI commenting at every
7 meeting, and we're a resource for material review
8 information and technical assistance. So while
9 OMRI is not called a certifier in the U.S.
10 organic sector, we are accredited by the USDA to
11 ISO 17065 to certify input products.

12 Since 2011, when the NOSB unanimously
13 recommended that the NOP establish accreditation
14 for material review organizations or MROs, OMRI
15 has advocated for such accreditation. The NOP
16 did not implement that recommendation. However,
17 in the interim instruction for material review,
18 OMRI was named, along with the California
19 Department of Food and Agriculture Organic's
20 Input Material Program, as MROs that certifiers
21 may consult with.

22 Being ISO 17065 accredited, OMRI is

1 obligated to accept applications from any company
2 that applies. OMRI is also obligated to review
3 any input products that submit the required
4 information and that meets the scope of our
5 review program. Finally, OMRI is obligated to
6 list any products that are compliant with the
7 organic standards.

8 We do not make decisions based on
9 personal opinions or a company's reputation.
10 Decisions are objective and based on fact. OMRI
11 does not take positions for or against materials.
12 Our job is to review input product compliance to
13 organic standards.

14 We are a neutral MRO that was created
15 in 1997 as a non-profit organization by and for
16 the organic community, and we continue to provide
17 a valuable service through our rigorous review
18 program. Thank you for allowing me to clarify
19 OMRI's role once again.

20 MR. CHAPMAN: Thank you, Peggy. Any
21 questions for Peggy? Steve.

22 MR. ELA: Could you provide your

1 thoughts, and I'm coming back to, like, paper and
2 paper pots, and how we as a board should address.
3 I mean obviously it's a petition for a product,
4 which we don't deal with, but how we can address
5 it as a generic issue and deal with the issue of
6 adhesives that perhaps are added after the paper
7 is made.

8 We know there's many adhesives in the
9 paper, but do you have any thoughts of how, what
10 would be a good way to proceed?

11 MS. MIARS: Thank you for that
12 question, and I am going to defer that to our
13 technical director, who's on the list coming up
14 later today.

15 MR. CHAPMAN: Any other questions for
16 Peggy? Harriet.

17 MS. BEHAR: So do -- how do you
18 consult with the certifiers then? Do they pay a
19 fee to you or can anyone call you? How does that
20 work?

21 MS. MIARS: We have a subscription
22 program. We have a certifier subscription

1 program where they sign a contract with us. We
2 are basically a contractor for them doing work
3 just like a lab or an inspector or that sort of
4 thing. There is an annual subscription fee. We
5 also offer subscriptions to the general public.
6 Anyone who wants to pay an annual fee can then
7 contact us for any kind of technical assistance.

8 For example, we have subscribers that
9 are libraries, colleges, universities, that sort
10 of thing, so that they get our newsletter, they
11 get our list and information so that their
12 clientele can refer to it. So in other words to
13 answer your question, anyone from the public can
14 be a subscriber and get assistance from us.

15 MR. CHAPMAN: Thank you, Peggy. I'm
16 sorry, Dan.

17 DR. SEITZ: How do you select people
18 to do the technical reviews? In other words, I'm
19 very glad to hear that you approach your work
20 very objectively and so forth. But someone's
21 background, whether that they've been in industry
22 or academia, can color sort of the approach that

1 they take to reviewing a material.

2 So what are the checks and balances
3 that you have to make sure that the technical
4 reviews we get are as objective as possible?

5 MS. MIARS: So I just want to clarify.
6 Are you talking about the product reviews that we
7 do or are you talking about technical reports?

8 DR. SEITZ: Well, the technical
9 reports for the NOSB, if I understood you
10 correctly, yeah.

11 MS. MIARS: Yes. Well, what we have
12 done is we typically rely on our advisory council
13 members. These are people with decades of
14 experience in the organic community. Many of --
15 or I won't say many, but some of them have
16 Ph.D.s, and so they understand chemistry and
17 science.

18 So the review is first -- I'll tell
19 you about our review process. First we do an
20 administrative review, make sure we have all the
21 documentation and paper work and so forth. Then
22 it moves on to a technical review, where we have

1 a technical reviewer who then looks at the
2 ingredients, the manufacturing process and so
3 forth, all that kind of detail.

4 Once we have all the information and
5 all the answers that we need, then the staff puts
6 together something called a findings of fact, and
7 that spells out all the information and a
8 recommendation. For most products, the decision
9 then goes to an external review panel, who are
10 again made up of people with experience in the
11 organic community. We have certifiers and so
12 forth that sit on those review panels.

13 Some products, if it's really simple
14 and we've seen that kind before and it's pretty
15 easy, those will be determined by an internal
16 review panel of qualified and trained staff.

17 MR. CHAPMAN: Emily.

18 MS. OAKLEY: Just a clarification.
19 That was for your internal product review, right?

20 MS. MIARS: Oh. I'm sorry, yes.

21 MS. OAKLEY: That's okay. That's
22 okay. I just want to be sure that Dan --

1 MS. MIARS: I got confused. I asked
2 the question, and then I got confused, yes.

3 MS. OAKLEY: No, it's okay. I just
4 want to make sure Dan understood.

5 MS. MIARS: But thank you for
6 clarifying that. So anyway, yes. For the
7 technical reports, we typically rely on our
8 advisory council members as I said, to either
9 author or to have a technical review. It depends
10 on the substance, it depends on the time line, it
11 depends on the availability of people. So
12 sometimes the staff will be the author.
13 Sometimes our advisory council members will be
14 the author.

15 MR. CHAPMAN: Thank you, Peggy.

16 MS. MIARS: Thank you.

17 MR. CHAPMAN: Up next is Mark Kastel.
18 On deck is Shannon Helms. Mark, if you could
19 start with your name and affiliation.

20 MR. KASTEL: Thank you, Mr. Chair. My
21 name is Mark Kastel. I am with the Cornucopia
22 Institute. We are a farm policy research group.

1 Who owns the organic label? We all do. First of
2 all, we wish Dr. Tucker well. She's inheriting a
3 troubled program.

4 When we founded the commercial organic
5 movement in the 1980s and asked Congress to pass
6 OFPA, this was viewed as a social and economic
7 justice vehicle for family farmers. \$50 billion
8 a year later, how's it working? Farm gate prices
9 for milk are down 25 to 50 percent, 50 percent.
10 Farmers are selling out.

11 Some organic fresh market vegetable
12 producers are telling us that CSA and market
13 sales are down as much as 30 percent. They can't
14 compete with pseudo-industrial organics or
15 hydroponics. Organic world crop producers can't
16 compete with phony imports from China or former
17 Soviet bloc countries, untrustworthy countries in
18 any kind of commerce.

19 While the NOP and this Board focuses
20 on important microissues, organic farmers are
21 losing their livelihoods. Conflicts of interest,
22 closing the revolving door. What if we had a

1 former certifier head the NOP? Congress charged
2 the USDA with oversight of certifiers
3 specifically, and past OIG audits were damning in
4 their criticism of the accreditation program.

5 What if that farmer, what if that
6 former certifier becomes a cheerleader, the
7 cheerleader-in-chief at the ACA meetings on
8 behalf of the certifiers he's supposed to be
9 overseeing? What if he makes secret, behind the
10 scenes deals with those certifiers which are
11 worth millions to them?

12 What if based on FOIA documents, the
13 largest certifiers that are found guilty of major
14 improprieties are let off the hook? Then what if
15 he leaves the USDA and goes to work gaining some
16 lucrative consulting contracts with the same
17 certifiers that he favored in the decisions while
18 he was running the program? How would that look
19 to the public?

20 What if a former NOP leader overrules
21 a certifier and allows an operator to substitute
22 a small porch holding maybe three to five percent

1 of the birds in a hen house, when the law clearly
2 states that all organic livestock, all must have
3 access to the outdoors?

4 And then what if that same former NOP
5 official waltzes through that proverbial
6 revolving door and becomes a lobbyist for the
7 same ag producer that that favorable ruling
8 benefitted? What if now you can close that
9 loophole and close that revolving door? Thank
10 you.

11 MR. CHAPMAN: Thank you, Mark.
12 Questions for Mark? Dan.

13 DR. SEITZ: First, I want to say
14 Jenny, I really appreciate the NOP's focus on
15 enforcement, and I think it's so key, and Mark,
16 your organization has for a number of years
17 highlighted what you consider to be non-adherence
18 to various pasture rules and other aspects of the
19 dairy industry.

20 So just in a couple of sentences, what
21 do you see are the main areas where certain dairy
22 farms are not in compliance with the rule, the

1 rules of the NOSB?

2 MR. KASTEL: Well first of all, this
3 criticism isn't directed at Dr. Tucker, and I'm
4 from Missouri, so I'm waiting for them to show
5 tangible results from this new program you're
6 instituting. So farmers right now can't sell --
7 farmers can't even go out of business, I'm not
8 exaggerating.

9 So farmers are on suicide watch, and
10 I'm not exaggerating. Their co-ops are getting
11 them psychological help. They can't sell their
12 cows. They can't -- they have loans on their
13 cows. They can't quit milking unless they sell
14 their assets. There's no market for organic
15 cows. They can't sell their farms.

16 So the NOP accreditation program has
17 allowed some of these dairies -- I don't have to
18 visit them, although if you look at our website
19 I've visited them. There's photographs. We
20 don't have to hire airplanes to fly over. We've
21 spent thousands.

22 If you look at the manure management

1 plans, the nutrient management plans that the
2 state regulators have publicly available for
3 these CAFOs, the average organic farm in this
4 country has about one cow per acre. Some of
5 these have ten cows per acre, and if you don't
6 think that's a funny enough joke, some of those
7 CAFOs in their organic systems plan have them
8 cutting hay off the same pasture.

9 So we don't know how much annual
10 growth they cut, but if it was 50 percent, that
11 would be an effective stocking rate of 20 cows
12 per acre. That ain't funny to me. And then so
13 what's the tie-in here with the revolving door,
14 conflict of interest, certifiers not doing their
15 job, QAI?

16 It's a matter of public record. If
17 you go to the Cornucopia Institute website, we
18 have a tab which is called under Programs,
19 Projects called the FOIA reading room, and you
20 can see the basis for some of these statement.
21 So Shamrock, with thousands of cows in the desert
22 outside of Phoenix, was criticized by the USDA,

1 found guilty of breaking the law.

2 QAI was criticized. What happened to
3 them? Nothing. CCOF, certifier -- I'm almost
4 done here, Mr. Chair, thank you. CCOF certified
5 Rockview in Amargosa Valley, Nevada. They had
6 5,000 cows, 2500 organic. They were forced to
7 reduce that to 300 after our complaint. They
8 never should have been certified in the first
9 place by CCOF.

10 Finally Aurora, after the Washington
11 Post story gave us all a black eye in this
12 community, was found by the NOP to have been
13 inspected by their certifier, the Colorado
14 Department of Agriculture in November of the
15 previous year, after pasture took place. All
16 that, Doctor, happened during the last
17 administration at the NOP, and the result is that
18 farmers are losing their livelihood now.

19 So we really applaud the initiative
20 that's going on now, cautiously optimistic and
21 we'll be hoping to positively critique it when
22 it's done. If not, we'll resume our criticism.

1 But thank you for the initiative.

2 MR. CHAPMAN: Thank you, Mark. Any
3 other questions? Thank you Mark.

4 MR. KASTEL: Thank you for the
5 opportunity.

6 MR. CHAPMAN: Up next is Shannon
7 Helms, followed by David Meyer. Shannon, you can
8 start with your name and affiliation.

9 MS. HELMS: Yes. Hi, my name is
10 Shannon Helms. I'm Regulatory Manager for CP
11 Kelco. CP Kelco has provided comments in support
12 of the relisting of gellan gum and xanthan gum.
13 CP Kelco's customers and organic community
14 benefit from the use of gums because while they
15 are used in very small amounts as ingredients in
16 foods and beverages, gums provide options for
17 healthier choices in dietary considerations such
18 as fat replacers, replacements for gluten or
19 replacement for traditional thickeners.

20 CP Kelco supports the continued
21 listing of gellan gum. Gellan gum is an approved
22 additive under the FDA, and gellan meets the FDA

1 definition of a stabilizer and thickener, and as
2 such gellan gum may be used to achieve the
3 technical and functional effects as listed in the
4 standards of identity.

5 Gellan gum provides the Organic
6 industry with unique properties to formulate
7 products for consumers across various application
8 segments. Gellan gum can be used in fortified
9 beverages to suspend proteins, minerals,
10 vitamins, fiber and pulp. Calcium fortified
11 beverages such as rice, soy and almond are of
12 great interest to the organic community.

13 Gellan gum also provides the organic
14 community with a non-animal gel source suitable
15 for vegetarians, vegans and those with religious
16 or dietary restrictions. Based on the unique
17 functionality of gellan gum and the numerous
18 organic applications, this substance is essential
19 to organic food production and should be retained
20 on the list.

21 Xanthan gum. We would like to
22 reiterate our previous request that the NOSB

1 consider listing the substance as a non-synthetic
2 under 205.605(a). Xanthan is a natural extra-
3 cellular polysaccharide, and is produced through
4 the natural process of bacterial growth, so it
5 may be best placed at 205.605(b).

6 Xanthan gum is produced from natural
7 sources. Fermentation is a natural process used
8 in food production for centuries. Xanthan gum
9 contributes unique attributes to food and
10 beverages, thus allowing many more organic
11 products to be formulated and marketed to the
12 consumer.

13 Xanthan gum functions as an effective
14 thickener, stabilizer and emulsifier, with
15 texturizing attributes that are attractive to
16 many applications. The typical amounts of
17 xanthan gum used are small, less than one percent
18 of the process food, and usually less than .25
19 percent due to its effectiveness.

20 This also makes xanthan gum preferable
21 to other gums, which may require much more of the
22 additive to be used to accomplish the same

1 effect. Xanthan gum is used in various food and
2 beverage formulations. Xanthan gum is also an
3 important ingredient widely used in foods for
4 populations with allergens and celiac disease.

5 Production of xanthan gum does not
6 harm the environment, and aligns with the organic
7 principles as it relies on natural processes with
8 no harmful metabolites or byproducts. As xanthan
9 gum is safe, aligns with organic principles and
10 lacks organic alternatives, CP Kelco urges that
11 the substance be relisted.

12 MR. CHAPMAN: Thank you. Harriet.

13 MS. BEHAR: There was a public comment
14 that there was a possibility that genetically
15 modified organisms are used in the production or
16 could be or may be used in the production of
17 gellan gum, and I'm wondering if you can speak to
18 whether that is a possibility, and if that's
19 something that certifiers and material review
20 organizations should be looking at when they are
21 allowing this substance?

22 MS. HELMS: There are possibly

1 products used in the formulation of some gellan
2 gums, not our gellan gums, that could be
3 considered GM. Many of our gellan gums go
4 through a third-party certification for non-GMO,
5 and it really is manufacturer to manufacturer.

6 MR. CHAPMAN: To clarify that, gellan
7 gum can be made non-genetically modified?

8 MS. HELMS: Yes, it can.

9 MR. CHAPMAN: Thank you. Any other
10 questions?

11 MS. BEHAR: Have you noticed any
12 increase in purchases of gellan gum, especially
13 since it seems the natural foods industry is
14 moving away from carrageenan?

15 MS. HELMS: I'm going to let either
16 David or Wanda actually address that. They're
17 closer to the sales and the technical, but yes.

18 MR. CHAPMAN: Thank you. Up next is
19 David Meyer, and then Wanda Jurlina. Dave, you
20 can start with your name and affiliation.

21 MR. MEYER: Good afternoon. I'm David
22 Meyer. I'm the Midwest Technical Service Manager

1 for CP Kelco, and I'll be talking about xanthan
2 gum today. So we just heard a little bit about
3 it, and I'm going to go through some reasons that
4 it's very unique and very important in food
5 science, and in making different food products.

6 So xanthan gum provides thickening.
7 It can provide suspension, it provides cling, and
8 one very unique property is that it's cold-
9 soluble, and this is very important in the
10 production of a lot of foods. It also has
11 excellent syneresis control, which is unique and
12 a very important attribute as well.

13 It stabilizes emulsions and it
14 stabilizes foams. It's used in a very wide range
15 of pH, temperature and it is enzyme-stable to
16 most enzymes. It provides high viscosity at very
17 low concentrations as you just heard, and it's
18 not chemically modified.

19 So what food applications is xanthan
20 gum used in? It's used in dressings and sauces
21 and syrups, toppings, baked goods, especially
22 gluten-free baked goods, bakery fillings,

1 beverages, dairy and non-dairy, confectionary,
2 batters and breadings, low-fat spreads. This is
3 a small list of the thousands of different
4 products that xanthan gum can be used in.

5 One very unique attribute that xanthan
6 gum has, it's a very long molecule, and when you
7 add shear and you add heat, it actually unwinds
8 and unfolds, and then it snaps back into place
9 when the heat, when it's cooled down or the shear
10 is no longer there. That's very important for
11 suspension. So that's why it can be used in
12 salad dressings and hold particulates up.

13 This slide is really hard to see, I
14 understand. But I just want to point out a few.
15 This compares xanthan gum to carrageenan to
16 gellan to pectin to guar and to locust bean gum
17 across many different food products. Some things
18 to understand, baked goods in especially gluten-
19 free baked goods, xanthan gum is very unique.

20 It's cold-soluble, which is quite
21 unique there. So it's very good in dry-mix
22 beverages. It's used in dressing and sandwich

1 spreads, as I said. So there's a lot of
2 important attributes that it has that makes it
3 unique and very important in the food industry.

4 Xanthan gum has a high elastic
5 modulus, meaning it's very good at suspension,
6 and it has very high pseudoplasticity, meaning at
7 rest it suspends everything, and then when you
8 pump it or you mix it or when you're swallowing
9 it, it gets really thin. It thins out almost
10 like water under heat or under stress. But when
11 you stop, it snaps back into position.

12 As I mentioned before, it's cold-
13 soluble and it's salt-stable after hydration,
14 which is also very important for many different
15 applications. Thank you for your time.

16 MR. CHAPMAN: Thank you. Any
17 questions for David? Thank you. Up next is
18 Wanda Jurlina, and on deck is Robin Hadlock
19 Seeley. Wanda, if you'd start with name and
20 affiliation.

21 MS. JURLINA: Okay, and it's that
22 button? Okay. All right. Wanda Jurlina. I am

1 Technical Service Manager for the Americas for CP
2 Kelco. I've spent my entire career working with
3 hydrocolloids, and I'm going to be talking to you
4 today about gellan gum.

5 So as I've talked to you before in the
6 past, when we talk about these hydrocolloids and
7 gums, people kind of lump them all together. But
8 each one of them has a very unique set of
9 properties. Up here, I've put up a slide that's
10 talking specifically about those that can create
11 a gel. David's just told you about gellan gum,
12 which is a thickening ingredient and very unique
13 in its properties.

14 I'm going to be talking about both
15 high and low acyl gellan gum. High acyl is the
16 one that is up for relisting at this time. Low
17 acyl we've submitted a petition, and would like
18 to see it added to the list.

19 If you look at these properties like
20 solubility, whether they can be used in
21 applications like capsules, how heat-stable the
22 gels are, the functionality of these ingredients,

1 you'll see that there's a range of Xs across the
2 chart, designating different places where each
3 one of these gelling agents can perform.

4 The thing to see with these really is
5 that not all of them can be used for everything.
6 So when talking a little bit more about the two
7 different types of gellan gums, high acyl is the
8 one that is on the right-hand side. So these
9 ingredients that we're talking about are all
10 polysaccharides.

11 So long chains of sugar molecules
12 linked together. In nature, the bacteria
13 sphingomonas elodea that makes gellan gum puts
14 some side chains on that molecule. That's the
15 high acyl. You've got two side chains, one on
16 the top and one on the bottom, an acetate and a
17 glycerate group.

18 If we leave those molecules on, we get
19 the high acyl with its unique properties. We
20 remove those side chains and we have low acyl,
21 which has very unique properties as well. If we
22 look at those properties and we start with high

1 acyl, because that's the one that's already
2 approved as a non-synthetic, it's really pretty
3 easy to use in the world of gellan gum.

4 It gives us opaque gels and
5 suspensions. We use it extensively in non-dairy
6 milks and in organic dairy milks for suspension
7 of nutrients, flavoring components. The low acyl
8 gellan gum, one of the areas where it has some
9 unique properties really comes down to that
10 capsule application, where it has some stability
11 benefits over other ingredients.

12 I've listed here a few of the
13 applications just to familiarize you with the
14 types of products that they go in, give you a
15 feel for where they have overlap, but where
16 they're each unique. They offer the organic
17 producers alternatives to other ingredients that
18 are on the list at this time.

19 MR. CHAPMAN: Questions for Wanda?
20 Harriet.

21 MS. BEHAR: When gellan gum was first
22 put on the National List, how come it was only

1 high acyl? Was the petition for --

2 MS. JURLINA: I would say that's an
3 excellent question, and I don't know if you can
4 find good results or good information within the
5 program's records. We originally submitted the
6 petition for both of them to be added, and were
7 told that only high acyl would be added.

8 MR. CHAPMAN: Steve.

9 MR. ELA: So we also have a petition
10 before us now on tamarind seed gum. I know each
11 of these gums have different properties, I fully
12 understand that. At some point, I mean even
13 though they have different properties, is there a
14 maximum number of gums that we need to pretty
15 well cover the spectrum?

16 MS. JURLINA: It depends on how
17 efficient a manufacturer wants to be in solving a
18 specific problem. So tamarind seed gum has been
19 promoted to the dressings and sauces industry as
20 a clean label thickening ingredient for those
21 types of applications. It has a pretty unique
22 texture and consistency, can be along the lines

1 of very gloppy and very structured.

2 So a lot of it comes down to what a
3 particular manufacturer is hoping to do with
4 their products. They're trying to produce an
5 organic product that looks like a commercial non-
6 organic product at this time. It will be
7 challenging to do that with something like
8 tamarind seed gum.

9 MR. CHAPMAN: Thank you.

10 MS. JURLINA: All right, thank you.

11 MR. CHAPMAN: Up next is Robin,
12 followed by Jessica Walden on deck. Robin, if
13 you can start with your name and affiliation.

14 MS. HADLOCK SEELEY: Yes. Hello from
15 Down East Maine. I am Robin Hadlock Seeley,
16 recently retired from Cornell University, where I
17 served as a senior research associate in the
18 Department of Ecology and Evolutionary Biology
19 and a faculty fellow at the Atkinson Center for a
20 Sustainable Future.

21 I'm now a faculty affiliate at the
22 School of Marine Science and Ocean Engineering at

1 the University of New Hampshire. One of my
2 research foci is state and federal policy on
3 seaweed harvesting around the North Atlantic
4 Ocean, particularly the U.S. and New England, and
5 the environmental impacts of seaweed harvesting.

6 The best way to gain an understanding
7 of the importance of preserving old growth
8 seaweed forests is to dive underwater or to spend
9 hours watching shore birds foraging in the
10 seaweed. But since we can't do that today, let's
11 just spend a few moments looking at some
12 underwater video, looking at how vulnerable fish
13 populations use these forests.

14 (Video plays.)

15 MS. HADLOCK SEELEY: And I will
16 mention that the National Maine Fisheries Service
17 has recently designated these rockweed beds as
18 essential fish habitat for juvenile cod, which
19 are in deep, deep trouble in the New England
20 area.

21 These rockweed forests, also known as
22 kelp in the organic market, are suffering under

1 the heavy demands for organic agricultural
2 products that contain this seaweed. How much are
3 they suffering? Dr. Heike Lotze of Dalhousie
4 University in Nova Scotia recently observes that
5 we don't have any old growth rockweed forests
6 left in Nova Scotia, because everything has been
7 harvested.

8 The seaweed industry in Maine has
9 admitted that the demand for organic ascophyllum
10 or rockweed or kelp drives them to take seaweed
11 from conservation areas in Maine, wild islands
12 under protection from the U.S. Fish and Wildlife
13 Service, Maine Coast Heritage Trust, the Nature
14 Conservancy, National Audubon and others.

15 One pressing question for the NOSB and
16 the organic community is whether seaweed harvests
17 should be and can be held to the wild crop
18 harvest standard in 205.207. There's a lot of
19 debate about this, but I want to close by
20 pointing out that in the comments submitted to
21 you, there have been a lot of good ideas and a
22 lot of cautionary notes.

1 A working group is essential, I think,
2 to hash out the details of how this could work,
3 and find common ground, examining impacts on the
4 organic sector and to wild native marine
5 ecosystems.

6 So please support the notion of
7 creating a working group, so the good ideas that
8 have already been proposed can be further
9 explored and teased apart for organic integrity,
10 but also to keep the organic label from degrading
11 the integrity of this wild native marine
12 ecosystem.

13 MR. CHAPMAN: Emily.

14 MS. OAKLEY: Thank you, Robin, for
15 your comments. Could you elaborate a little bit,
16 based on the written comments that you've
17 provided on some thoughts for the working group
18 and ways that you would see it being led and
19 being most effective.

20 MS. HADLOCK SEELEY: Yes. In my
21 written comments, I suggested that it could be
22 co-led by a marine conservation biologist and an

1 industry member, so that those two sides could
2 lead and there wouldn't be dominance by one side
3 or the other. I've been in groups where a
4 professional facilitator is involved, and that
5 was extremely helpful when the sides are quite
6 far apart.

7 Another thing I wanted to mention is
8 that this working group could go through the
9 sustainability certification from the marine -- I
10 forgot what the initials are, MSC, from MSC. Not
11 that you would adopt the MSC standards wholesale,
12 but there's certainly elements of the MSC
13 certification that they spent a long time working
14 through that would be helpful to NOP, I think.

15 MR. CHAPMAN: Rick.

16 DR. GREENWOOD: A quick question in
17 terms of percentage of harvest. I assume all of
18 the kelp is not harvested by organic individuals.
19 So do you have an idea if it's 50-50 or 80-30,
20 and where I'm going with this is maybe it's a
21 broader issue than just for the organic community
22 to look at.

1 MS. HADLOCK SEELEY: Oh, it certainly
2 is a broader issue, but you guys are organic, so
3 I'm coming to talk about the organic. I have no
4 access to data that would tell me how much of the
5 market is organic or not. Emily visited Maine,
6 and she might know better, but I certainly don't
7 know.

8 MR. CHAPMAN: Thank you. Dan.

9 DR. SEITZ: Well, Rick just asked one
10 of my questions, but my other question is are
11 these kelp beds being harvested illegally? You
12 mentioned that there's harvesting going on in
13 protected areas, places where fishermen have
14 certain rights over protecting the beds for the
15 sake of the fishing industry. So are there still
16 just open season on these kelp beds, or are
17 things happening illegally?

18 MS. HADLOCK SEELEY: So for 90 percent
19 of the coast, there's virtually no regulations on
20 seaweed harvest. There's no limit to what you
21 can take, the amount you can take. There's no
22 limit on where you can take it all -- except for

1 the federal lands. The federal lands are off
2 limits, but everything else is open.

3 And right now, there's a lawsuit at
4 the level of the Maine Supreme Court, because
5 land owners, including conservation land owners,
6 are making the case that they have ability to
7 turn seaweed harvesters away because of their
8 ownership of the seaweed. But that's still in
9 the courts and quite complicated. So we're just
10 waiting for a decision on that.

11 MR. CHAPMAN: Asa.

12 MR. BRADMAN: You just hinted at the
13 question I was going to ask, but who -- when you
14 say land ownership, you know, and we're talking
15 about a marine environment where you know in many
16 places once you're out past the mean high tide
17 mark, it's not -- land owners don't control that
18 environment. So I'm curious about tensions
19 between both federal, state and then individual
20 jurisdiction, and how to approach that.

21 Because I know for me it's distressing
22 to hear about, you know, possibly damaging a wild

1 resource for organic agriculture.

2 MS. HADLOCK SEELEY: Well, this could
3 be a 30-minute law lecture, but in Maine and
4 Massachusetts, Maine and Massachusetts are
5 subject to the colonial ordinance, which means
6 that the upland land owner owns down to mean low
7 water, not high water the way it is in other
8 states in New England, but low water.

9 So the upland land owner actually owns
10 everything in the inner tidal zone. But subject
11 to fishing, fowling and navigational rights that
12 were in that 1620 ordinance. The question is, is
13 seaweed part of the public trust right to fish or
14 not. Now the seaweed companies are saying that
15 seaweed is a fish, and so by rights because they
16 come in a boat and take it in a boat, it's
17 therefore a fish.

18 So by the colonial ordinance, they are
19 within their rights to come in and fish for a
20 plant, and the land owners are saying no, it's
21 really a plant. So since it's a plant, you don't
22 have a public trust right and come and take it,

1 and that's what the lawsuit is about.

2 So any minute now we expect the high
3 court of Maine to come and tell us whether
4 seaweed is really a fish or not a fish.

5 MR. CHAPMAN: Briefly.

6 MS. OAKLEY: Even within this
7 discussion, you know, we're conflating
8 ascophyllum nodosum with kelp, which you and
9 others have helped us realize over time it's
10 actually not kelp. And so one of the questions
11 that we had in the discussion document was the
12 feasibility of listing the species on the
13 ingredients list, to help understand what it is
14 that a producer is using.

15 I know some of the public comments
16 actually referred to a desire not to associate
17 rockweed with kelp, so that consumers aren't
18 confused by the potential changes in benefits.
19 What are your thoughts on listing species?

20 MS. HADLOCK SEELEY: Oh I think they
21 absolutely have to be listed, and there's
22 elements of the seaweed industry that request

1 that it be separated out too, because sometimes a
2 consumer will want to buy rockweed for one
3 purpose and go to a bag and see that it's listed
4 as kelp when it really is rockweed. Yeah, I
5 think that's essential, because otherwise it
6 misleads the consumer.

7 And part of that is a biological
8 reason, because consumers are getting more and
9 more educated about these seaweeds. They know
10 that kelp grows really quickly. It regrows a
11 centimeter a day, whereas rockweed will grow four
12 centimeters in a growing season. So educated
13 consumers are now wanting to turn away from
14 rockweed and use the rapidly growing kelp, not
15 only because it grows rapidly but because it can
16 also be farmed.

17 Rockweed can't be farmed. So if you
18 buy kelp, you'll often be buying something that
19 was farmed. But you'll never be buying farmed
20 rockweed, because it doesn't exist.

21 MR. CHAPMAN: Thank you.

22 MS. HADLOCK SEELEY: Thank you.

1 MR. CHAPMAN: Up next is Jessica
2 Walden, followed by Alexis Randolph. Jessica, if
3 you can start with your name and affiliation.

4 MS. WALDEN: Okay. Hello, I'm Jessica
5 Walden with QAI. Today I'll be commenting on the
6 sunset material calcium carbonate. The Handling
7 Subcommittee proposal doesn't describe whether
8 certain forms of calcium carbonate, namely
9 precipitated calcium carbonate, are covered under
10 the subcommittee's recommendation to approve its
11 continued listing.

12 Certifiers often refer to the
13 technical report when determining whether a
14 particular form of a material is covered under
15 that national listing of the material. So if you
16 look at the most recent TR posted in 2018, the TR
17 refers to precipitated calcium carbonate as
18 synthetic, which is confusing.

19 It's unclear whether or not the
20 authors of the TR are aware of the NOP's
21 classification of materials document and criteria
22 for determining synthetic versus non-synthetic.

1 The TAP review carried out in 1995 did include
2 precipitated calcium carbonate as one of the
3 other names for calcium carbonate that was
4 approved for listing way back in the day.

5 This contributed to the allowance of
6 precipitated calcium carbonate, I'll call it PCC
7 from this point onward, in processed organic
8 products by organic certifiers. So we suggest
9 that the NOSB clarify that the TRs are not
10 necessarily the place to inform certifiers and
11 the industry of the formal material
12 classification status, and that it is the NOSB's
13 responsibility during their review of the
14 materials to make that determination.

15 QAI's written comments pointed out
16 that the starting substance is mined calcium
17 carbonate, which does undergo a chemical change
18 during the purification process, and then is
19 reformed into calcium carbonate. So this is the
20 PCC processing steps. In other words, the
21 starting material is chemically the same as the
22 final material, which according to the NOP

1 decision tree would result in a non-synthetic
2 material.

3 The situation is similar to
4 purification steps for other non-synthetic
5 materials on the National List like lactic acid
6 and citric acid, which QAI discusses in greater
7 detail in our written comments. So we hope that
8 the final recommendation for calcium carbonate
9 will address the following:

10 Clarification that the TR should not
11 be the place to advise the industry on the final
12 material classification; clarifying that where a
13 non-synthetic material may have gone through a
14 chemical change during purification steps, if it
15 is reformed into a pure grade of the starting
16 non-synthetic material, the classification status
17 of the purified product does not change, since
18 the final product is a purified version of the
19 starting material and not a new material that has
20 been created through a chemical reaction.

21 Or, that you clarify that this
22 particular issue will be addressed in the future

1 by the NOSB, but for now the status of PCC is not
2 affected while further research is carried out.

3 Thank you.

4 MR. CHAPMAN: Scott.

5 MR. RICE: Thanks for your comments,
6 Jessica, and I know Oregon Tilth also expressed
7 similar observations. One question for you.
8 Would you say there's any other info in the most
9 recent TR that would suggest a synthetic
10 classification, or is it just perhaps a different
11 read or not recognizing the decision tree?

12 MS. WALDEN: The TR is a little bit
13 confusing. I have read it a couple of times and
14 in one place it talks about the main
15 manufacturing process as being this particular
16 process, where a chemical change does exist, and
17 then later it calls it out as a synthetic form of
18 calcium carbonate.

19 So I think it really just -- it was
20 hard for me to follow, but because we rely on,
21 you know, as we're a certifier for reviewing the
22 calcium carbonate, if we're looking at a PCC spec

1 sheet, and under the TR that's classified as or
2 called out as synthetic, then we would think that
3 that material's not allowed under the National
4 List, under NOP.

5 So I think the TR informs how calcium
6 carbonate can be manufactured, but it's just
7 unclear which would be allowed under the National
8 List listing and which wouldn't.

9 MR. RICE: So I guess a follow-up for
10 the program in terms of a process to address
11 this, would that be, in terms of respecting how
12 that decision tree is used by a certifier or by
13 the TR, I'm not recalling an instance where we've
14 run into that, and would the process be to
15 address something like that?

16 DR. PAUL LEWIS: Thanks, Scott. So I
17 think the best way to look at this is relying on
18 a decision tree that is shared in terms of the
19 TR. Again, it's just a document that the Board
20 uses to help in terms of developing
21 recommendations, and the Board can look at the TR
22 as a guide. But it's not the sole document in

1 terms of providing direction, providing decision
2 tree.

3 Obviously for the public to look at
4 the recommendations that the Board provides,
5 taking into account the TR and public comments
6 that are brought up at a meeting like this.

7 MR. RICE: Thank you.

8 MR. CHAPMAN: Other questions?

9 Harriet.

10 MS. BEHAR: Would this bring up an
11 issue that perhaps the PCC should be petitioned
12 for 605(b)?

13 MS. WALDEN: Well, I guess it depends
14 on how it's assessed. I don't think there was an
15 opportunity for the Handling Subcommittee to
16 actually make determination on this particular
17 form of calcium carbonate because it wasn't
18 included in the proposal.

19 You know, QAI would look at it as it
20 would be a non-synthetic material based on
21 precedent with other non-synthetic materials on
22 the National List because it is a purification

1 step. It's not forming a new material. But it
2 would be up to the subcommittee to look at it and
3 make the determination based on the decision
4 tree. But I don't know, think it needs to be
5 petitioned. It's just rather including that in a
6 review.

7 MR. CHAPMAN: So in looking at the
8 PPM, the Policies and Procedures Manual, a
9 technical review is defined as a report prepared
10 by a third-party expert under contract addressing
11 the environment, human and industrial impact of a
12 petitioned material per OFPA and regulatory
13 evaluation criteria, to aid in the thorough
14 evaluation of that material by the NOSB.

15 So in our own definition, it does not
16 refer to it as a tool to be used by certifiers to
17 make determinations, or that it being a
18 determining document, rather an aid to the NOSB
19 itself. But you don't think that is sufficient?

20 MS. WALDEN: No. I think that that is
21 completely fine, so long as the -- I guess then
22 the proposals or the final recommendations needs

1 to encompass the forms that are being used,
2 perhaps in a more thorough fashion, at least for
3 this material.

4 Maybe it wasn't necessarily known of
5 the forms that are used in handling, but yeah.
6 So there needs to be -- something needs --
7 certifiers need to be able to look somewhere, to
8 try to determine whether a material would be
9 included.

10 Or maybe not. Maybe we just assess
11 it. But it causes confusion amongst certifiers
12 about the status. So it's just letting you know.

13 MR. CHAPMAN: Thank you. Any other
14 questions? Seeing none, thank you, Jessica.

15 MS. WALDEN: Thank you.

16 MR. CHAPMAN: Up next is Alexis,
17 followed by Charlotte Vallaeys.

18 MS. RANDOLPH: Okay, this one?

19 MR. CHAPMAN: If you could start with
20 your name and affiliation.

21 MS. RANDOLPH: Okay, thanks. Hi,
22 everybody. My name is Alexis Randolph. I am

1 with QAI, an organic certification agency from
2 San Diego, California. I'm here today supporting
3 the proposal for a risk assessment approach for
4 accreditation.

5 QAI has a very robust risk assessment
6 program for our own operators, and I'd like to
7 share some concepts with the Board and NOP. In
8 our industry, risk is a loss of organic
9 integrity. Determined by the likelihood it will
10 happen, given the facts available, risk factors
11 can be a combination of elements applicable to
12 all operations and specific to certain operation
13 types.

14 Potential for loss of organic
15 integrity increases when an operation has
16 multiple risk elements at play. Additionally,
17 some risk factors can be significant as they
18 indicate an already compromised system. QAI
19 applies a risk assessment three times in the
20 annual certification process for each operator:
21 at application review, post-inspection and after
22 the operator mitigates any corrective actions.

1 We utilize a scoring system that
2 results in a high, medium or low risk, and each
3 risk factor has a weighted value. Here's an
4 example of some questions and our method used
5 when applied to all operators. A number one is
6 added to the pink column by the reviewer for each
7 item applicable to that operator.

8 You can see questions have been given
9 a weight value of five to twenty points, and an
10 item such as prior suspension indicates a
11 previously compromised system. Therefore, it has
12 more weight in the risk calculation. Whereas an
13 operator using a lot of inputs is something to
14 look closely at, but isn't in itself a
15 significant risk.

16 The form calculates a risk score in
17 the right-hand column and the higher the total
18 score, the higher the risk. We have 32 total
19 risk factors for operators. This is just a few,
20 but you can see that they fall into three basic
21 categories: operator history, commitment to
22 organic and site-specific conditions.

1 The NOSB recommendation has done a
2 nice job identifying risks across all these areas
3 for evaluation of certifiers. Commitment is
4 important and sometimes overlooked. I think a
5 few more items in this category could be added
6 once the NOP takes up the proposal, such as
7 attending NOP trainings, this NOSB meeting,
8 online webinars and other activities that
9 indicate the certification agency is engaged and
10 staying current on the issues.

11 It's important to have an outcome-
12 based action from any assessment. QAI's outcomes
13 include inspection frequency, additional
14 sampling, unannounced visits, inspector selection
15 and specific instructions that focus on specific
16 areas in the next audit. High risk operators
17 will always have additional actions taken.

18 For medium risk operators, our file
19 reviewers have latitude to decide if additional
20 inspections or sampling is mandatory prior to
21 certification, even though the operator did not
22 score as a high risk.

1 Low risk operators may also randomly
2 be selected for five percent unannounced or
3 sampling, or they're otherwise not on our radar.
4 The NOSB recommendation is an excellent start for
5 risk assessment programs are never static.

6 It's important to analyze the
7 effectiveness. How many high risk scores are
8 there, did the result match your experience with
9 the company and if not what needs to be adjusted.

10 Lastly, risk assessments are just one
11 tool. We always need to focus on the big
12 picture. Thank you.

13 MR. CHAPMAN: Questions. Scott.

14 MR. RICE: Thanks, Alexis. I
15 appreciate all your comments here and written. I
16 think you echoed some other comments from the
17 public on this being not an exhaustive list, and
18 we tried to communicate as well of just a
19 starting point. So I think having the metric of
20 risk assessment is a really great tool as well,
21 and I think the intent of the proposal is to give
22 the program something to jump off from and

1 continue to evolve and work on and keep
2 improving.

3 I think similar to the inspector
4 qualifications discussions that we've had, I
5 think it's the interest of the Board and the
6 community to continue that dialogue with the
7 program, and not just have this be something that
8 is delivered and never seen again. So I think
9 your comments are a good stepping off point for
10 that.

11 MS. RANDOLPH: Thank you. As far as
12 continuous improvement process, we have the
13 starter risk assessment program based on the EU
14 standards requiring it for operators in order to
15 determine how many annual inspections to have.
16 Once we started that, we realized the value in it
17 and we continue to refine our program year after
18 year.

19 So I look forward to the NOP
20 implementing such a program for their
21 accreditation process, and I think it will be
22 beneficial for everyone and be refined over the

1 years to come. So thank you very much.

2 MR. CHAPMAN: I have a question for
3 you too.

4 MS. RANDOLPH: Sorry.

5 MR. CHAPMAN: Hold on. Are you able
6 to share your 16 risk assessments? Yours is for
7 the certifier not --

8 MS. RANDOLPH: Correct.

9 MR. CHAPMAN: Yeah, yeah.

10 MS. RANDOLPH: Yeah.

11 MR. CHAPMAN: So are you able to share
12 that to the open docket?

13 MS. RANDOLPH: I am able to share it.
14 This was very high level. Three minutes is hard.
15 It's super-complex. So it's much more complex
16 than what I just presented, because we go into a
17 lot of the detail about how did we decide what
18 the risk factors are, and then how do we verify
19 those with operators, sort of along the lines of
20 what the NOSB proposal looked like in terms of
21 what steps to take.

22 So I can share that, but you'll

1 probably have questions. So I'm happy to do that
2 and happy to answer any questions by the Board or
3 the program afterwards.

4 MR. CHAPMAN: Yes, that would be
5 great. How common of a practice is this amongst
6 certifiers, the risk assessment, to the best of
7 your knowledge?

8 MS. RANDOLPH: Well, I mean to my
9 knowledge, I know it's very common with
10 certifiers that certify internationally. Like I
11 said, it's a requirement for the EU, and
12 certifiers are also always sharing information
13 and our best practices with each other. So I
14 think more certifiers have been taking this on as
15 one tool.

16 MR. CHAPMAN: All right. But each
17 certifier kind of sets their own criteria and
18 weightings?

19 MS. RANDOLPH: Yes, yes. Each
20 certifier sets up their own system, and then
21 actually our -- our assessment system is looked
22 at when we have our EU accreditation visits.

1 MR. CHAPMAN: Okay, thank you.

2 MS. RANDOLPH: Yes.

3 MR. CHAPMAN: Thank you. I keep
4 seeing movement from Dan. I assume he's raising
5 his hand, but I think he's just typing. Sorry.

6 (Laughter.)

7 MR. CHAPMAN: Up next is Charlotte,
8 and on deck is Jackie DeMinter. Charlotte, if
9 you could start with your name and affiliation.

10 MS. VALLAEYS: Good afternoon. My
11 name is Charlotte Vallaeys. I'm a senior policy
12 analyst with Consumer Reports, an independent
13 non-profit organization that works side by side
14 with consumers to create a fair, safer and
15 healthier world. One of our areas of focus is
16 food labels, which we rate to empower consumers
17 with knowledge to make better and more informed
18 decisions when shopping for food.

19 We also do nutrition and sensory
20 ratings of packaged foods, and we recently
21 incorporated whether a food is certified organic
22 into our nutrition rating system.

1 Copies of the October Consumer Reports
2 magazine are available to you and for you on the
3 table back there. So please check out our
4 nutrition bar ratings and our note about why we
5 give more points to products that are USDA
6 organic.

7 On the magazine's cover, it tells the
8 story of banned drugs found in meat. Our food
9 system is broken in many ways. We think it's
10 critical therefore for consumers to have access
11 to foods from a system that is backed by strong
12 and meaningful standards, with additional
13 oversight and enforcement, and that is easily
14 identified on the foods label.

15 We end our cover story by telling
16 consumers that one thing they can do is choose
17 organic. But when the Organic label falls short,
18 we ask you to strengthen the standards. Thank
19 you to the NOSB's Livestock Subcommittee for
20 putting in the work plan request, and we urge the
21 USDA to support it, prohibiting the use of
22 antibiotics in organic agriculture without

1 exceptions.

2 Eliminating the routine use of
3 antibiotics in animals that aren't sick is a top
4 priority for Consumer Reports, given the
5 connection between the overuse of antibiotics and
6 the development of antibiotic resistance,
7 especially in pathogens.

8 While the organic standards prohibit
9 the use of antibiotics, there is an exception.
10 OFPA exempts day-old chicks from organic
11 management. That means that all organic chickens
12 and turkeys could be treated with antibiotics
13 while they're still in the egg and on the first
14 day of life, and sold as organic.

15 We often write about what organic
16 means. Again, in this magazine you'll see it in
17 the nutrition bar story. When we're talking
18 about livestock and meat and poultry, can we
19 write organic means no antibiotics were used?
20 No, we can't. We have to put in a disclaimer,
21 except for day-old poultry. Can you please just
22 fix this?

1 We asked the USDA to take action on
2 this for the first time in 2015. The Secretary
3 of Agriculture at the time responded, quote, the
4 NOP will be requesting that the NOSB provide a
5 recommendation on management practices for day-
6 old chicks, end quote. This is not a
7 controversial issue.

8 Even Tyson and Purdue have entirely
9 stopped using antibiotics in hatcheries and day-
10 old chicks. At Consumer Reports, we're not
11 beholden to any interests other than telling
12 consumers the truth, and we'd like the truth to
13 be that organic means no antibiotics, period.
14 Thank you.

15 MR. CHAPMAN: Ashley.

16 MS. SWAFFAR: Charlotte, I just want
17 to say thank you for all of your diligence in
18 bringing this up for many, many years. Obviously
19 you've heard what the program said this morning,
20 that it would require a change in OFPA. I know
21 you've done some legal analysis on that. Could
22 you kind of go into what, how you see we actually

1 could work on this?

2 MS. VALLAEYS: Sure, yes. The fact
3 that the exemption is in OFPA is obviously an
4 issue. So before we brought this to the
5 Secretary of Agriculture in 2015, we had a full
6 legal analysis done. Essentially what it boils
7 down to, well first of all I encourage everybody
8 to read it. The summary of it is in the comments
9 that we submitted.

10 But what it boils down to is that OFPA
11 exempts the day-old poultry from organic
12 management in general. It does not prohibit that
13 a singular component of the organic standards, in
14 this case prohibiting antibiotics, be applied to
15 day-old poultry.

16 So we're not asking change OFPA,
17 require organic management as a whole for day-old
18 poultry. We're just asking in the regulations to
19 put in a singular prohibition on antibiotics,
20 that's it. So according to our legal analysis,
21 that requires NOSB action. In 2015 the Secretary
22 of Agriculture said that that would be requested.

1 So we think it shouldn't be that difficult to do.

2 MS. SWAFFAR: And Charlotte, just like
3 told the commenter earlier this morning, I think
4 we need to elevate this to the Secretary level
5 again.

6 MS. VALLAEYS: I agree, and we will.

7 MS. SWAFFAR: Yeah, thank you.

8 MS. SWAFFAR: Charlotte, I really
9 appreciate that Consumer Reports is focusing on
10 the health benefits of eating organics.
11 Occasionally, there are backlashes against
12 organic food, and there was a study that came out
13 of Stanford that claimed that there's no
14 difference between organic food and
15 conventionally grown food, and was picked up I
16 saw by a magazine like the Harvard Health
17 Magazine picked that up and some others.

18 Have you looked at those studies, and
19 what do you think is happening in those types of
20 studies that get pretty wide circulation, because
21 they're somewhat sensational in terms of their
22 findings?

1 MS. VALLAEYS: So we actually wrote a
2 story on Monday. It's on CR.org under News, and
3 it's reporting on the new study published in
4 JAMA, and it's prospective cohort study out of
5 France that found a 25 percent risk reduction for
6 breast cancer and lymphoma when people eat
7 organic food. So again, after we posted that
8 story there was backlash to us picking it up and
9 telling consumers about the benefits.

10 What we see consistently is that they
11 tend to criticize that it wasn't a well-run
12 study. It absolutely was, or that you can't draw
13 a conclusion based on one study, which we agree
14 with. So you know, we do what we can to tell
15 consumers when studies like this come out and
16 they support eating organic, that it doesn't
17 prove anything, but it's another piece of
18 evidence to support this kind of bigger picture
19 that organic does have health benefits.

20 MR. CHAPMAN: Thank you.

21 MS. VALLAEYS: Thank you.

22 MR. CHAPMAN: Up next is Jackie, and

1 on deck is Rudy Amador. Jackie, if you can
2 start with your name and affiliation.

3 MS. DeMINTER: Good afternoon. My
4 name is Jackie DeMinter. I am the Certification
5 Policy Manager at MOSA. We certify about 2,125
6 operations throughout the United States. I will
7 be commenting today on paper pots.

8 At the spring meeting, I commented on
9 this topic to bring your awareness to the issue,
10 and since then I've taken part in submitting a
11 petition for your consideration. While the
12 petitions were for a specific paper chain pot,
13 MOSA recognizes that all paper pots are being
14 impacted by this conversation.

15 In 2019, we will have to prohibit all
16 paper pots including newspaper pots, recycled
17 cardboard boxes and the paper chain pots. While
18 we weren't the first certifier to allow paper to
19 be used as a pot, we were probably the first to
20 allow the paper chain pots. The rationale then
21 is the same as it now.

22 Paper is on the National List as a

1 compost feedstock in mulch. The additives used
2 in the paper pots are included in other paper we
3 would allow. In fact, we would allow these exact
4 pots to be removed and composted. Secondly,
5 but worthy of mention, the additives are also
6 allowed as inert substances in pesticides.

7 Originally, we didn't consider the
8 recycled nature of the paper. However, with the
9 publication of 50.34-1, we now align with the
10 best practices recently presented to certifiers
11 for the review of paper, which supported a
12 liberal interpretation of what it means to be
13 recycled, and did not feel that an analysis of
14 the full manufacturing process of the paper is
15 necessary.

16 Allowable sources of recycled paper
17 include any paper that has been diverted from a
18 waste stream, has been previously used in any
19 manner, or includes any amount of recycled
20 content, and of course newspaper including virgin
21 newsprint. Recognizing this new focus on the
22 recycled nature of paper, the petition broadly

1 lists other paper and includes hemp paper.

2 It would seem contrary to practical
3 judgment to say that paper or fibers from organic
4 hemp could not be used to make a paper pot.
5 Farmer comments have spoken to the efficacy of
6 the paper pot system, specifically the reduction
7 of fossil fuel use, plastic, mulch, money, labor,
8 time, etcetera. There has to be value on
9 sustainability in organics.

10 Rather than a specific focus on this
11 one paper chain pot, we ask that you consider the
12 generic category of paper as a crop production
13 aid in your discussions, and we also again ask
14 the NOP to extend the phase out requirement. We
15 approve paper pots in good faith in what we
16 thought was solid rationale and practical
17 application of the standards, and so did many
18 other certifiers.

19 We recognize that the standards do not
20 spell out everything for us, and we don't expect
21 them to. There is room for interpretation, and
22 try as we might, certifiers do not always agree.

1 We'd argue that far more farmers have been
2 allowed to use the paper pot system than have not
3 been, and we also certify a number of farmers
4 that use other paper pots too. Seeing negative
5 impacts to farms using any paper pots is
6 disheartening.

7 MR. CHAPMAN: Emily.

8 MS. DeMINTER: I had one more
9 sentence, to thank the NOSB for their work.

10 (Laughter.)

11 MR. CHAPMAN: You can always add that
12 in.

13 MS. OAKLEY: This is a question for
14 the program. Could we consider this paper
15 recycled by the time it's applied to the soil as
16 a mulch for the transplant itself, because it was
17 originally used in the greenhouse as a first-time
18 use for growing the seedling?

19 DR. TUCKER: So I think we're hearing
20 a lot of great information on paper pots at this
21 meeting. I look forward to taking this feedback
22 back. So seriously, keep the comments coming.

1 This is very, very helpful. I think this is why
2 we have public meetings, is to have this kind of
3 diversity of opinion. So it's all useful.

4 MR. CHAPMAN: Harriet.

5 MS. BEHAR: So again, also for Jenny,
6 I mean if someone rolled up newspaper into a pot,
7 I mean are we -- so I think the reason for MOSA
8 and the other certifiers was they were looking at
9 the generic material, and not its necessarily its
10 use. So we see now that we need it listed and
11 annotated by a production aid.

12 But we also feel that the -- at least
13 I do, that the original rationale for allowing it
14 was not highly flawed in putting something that
15 wasn't already allowed on the land.

16 So again, and I think there were quite
17 a few certifiers in the public comment who said
18 they did not allow it, but they did agree to an
19 extended phase out period, to give the NOSB their
20 time to put it on the National List in the
21 correct place with the right annotation.

22 MR. CHAPMAN: Do we have a question

1 coming?

2 MS. BEHAR: So the question is what do
3 you think the economic impact will be on your
4 producers, and would there be any economic impact
5 to MOSA if the paper pots do go away at the end
6 of this year?

7 MS. DeMINTER: I certainly think that
8 there will be economic impact to MOSA, because we
9 have had clients tell us that they will have to
10 choose between their certification and the pots,
11 and the pots are going to win, because the pots
12 are what makes their farm sustainable.
13 Certification is secondary to that farming.

14 Their clients know they grow their
15 products organically, so that doesn't sound like
16 as big of a factor in their business
17 considerations. But I certainly don't want to
18 speak to the farmers, and there's a number of
19 them out here that I know are going to be
20 speaking.

21 In fact, the petitioner John
22 Hendrickson is here, and he'll be speaking in

1 just a bit, and can speak far more about the
2 farmers that he works with on the ground and that
3 use this system. As far as we are concerned, you
4 know, there will be clients that aren't able to
5 or will need to choose to certify, excuse me,
6 drop certification for either a portion of their
7 operation or their entire operation. It might
8 just not become feasible for them anymore.

9 MR. CHAPMAN: Thank you. Jenny, and
10 then Steve.

11 DR. TUCKER: I just wanted to make a
12 brief comment on material reviews, and this is
13 sort of a general comment for folks. When we do
14 get a material conflict at the NOP level, we do
15 take into consideration good faith reviews. No
16 certifier received a notice of non-compliance for
17 having approved paper pots.

18 MS. DeMINTER: Thank you for that.

19 DR. TUCKER: So I think that as I
20 shared this morning, there were good reasons why
21 certifiers said they were allowed. There were
22 good reasons why they said they weren't, and we

1 agreed with that group. So but that doesn't mean
2 that we -- material reviews are really important,
3 and are really, really important for certifiers
4 to do well, and occasionally certifiers are going
5 to come to different answers.

6 If we find that a certifier really did
7 a frankly crappy job at reviewing a material,
8 then that can lead to a notice of non-compliance,
9 because they really need to raise their game on
10 material reviews. But I did want to emphasize
11 that certifiers who did approve paper pots did
12 not receive any kind of non-compliance on this
13 issue.

14 MS. DeMINTER: If you didn't hear me,
15 I said thank you for that.

16 DR. TUCKER: Okay, thank you.

17 MR. CHAPMAN: And we do have the
18 administrator saying "crappy" in the record now,
19 so that's also pretty sweet. Steve.

20 MR. ELA: Same question I've been
21 asking others, paper pots. As we look in Crop
22 Subcommittee on that petition, and we've heard

1 that probably --

2 I mean we can't do it as a product, so
3 we have to make the generic, which I mean I think
4 we're kind of coming around from hearing comments
5 here to paper as a planting aid, how would you --
6 how would you approach this, because it's not a
7 material. It's a whole, it's hemp, it's paper,
8 it's adhesives.

9 How would you suggest we approach that
10 to list it without opening up the whole world to
11 any adhesive out here, or limiting the amount of
12 adhesive or trying to make it as concise and
13 focused as we can while not running into this
14 problem in the future?

15 MS. DeMINTER: I think that we would
16 encourage you to follow the same process you
17 followed with compost, feedstock and mulch. The
18 technical reviews there, as Jo Mirenda pointed
19 out I think, that there are a number, I mean a
20 wide array of synthetics included in just generic
21 paper.

22 So if we want to hone in on specific

1 categories of those in your technical review, I
2 don't think that, you know, as a certifier we're
3 not going to be opposed to that necessarily, but
4 I think we would recognize the discrepancy on
5 allowing all of those additives to be used as
6 mulch between the rows and then the pots in the
7 rows can only have a certain amount of additives.

8 So it's this consistency. Part of my
9 job is to try to explain to farmers why we do the
10 things we do, and I need to be able to explain
11 that reasoning. Right now, we allow the paper
12 pots because it makes sense to allow the paper
13 pots. Mulch and compost feedstocks are allowed,
14 and to try to explain to a farmer than you can do
15 those things and you can put the compost right
16 around the plant in the hole, but you've got to
17 take that pot off, it just -- the logic doesn't
18 work for the farmers.

19 So that's what I -- your goal is to
20 give us something that we can work with, that
21 makes sense and is reasonable and is practical.

22 MR. CHAPMAN: So do you have any -- I

1 mean in a case like the paper pots, where we're
2 adding adhesives after the paper, I mean recycled
3 mulch we're just taking the product. We're
4 putting it out there. I can see in the future we
5 can oh sure, we're taking this paper pot, but
6 we're having to use it after the fact.

7 That kind of opens up the door for if
8 we just say paper is an aid or something. It
9 would open, potentially open the door to
10 materials we really don't want in paper pots
11 added after the fact. So I'm trying to figure
12 out how do we limit just, you know, I mean we
13 were talking about antibiotics and
14 microcrystalline cheese wax earlier.

15 Or, you know, how do you limit in an
16 annotation or some kind of wording, so that it's
17 kind of, the same adhesives used as in paper or
18 --

19 MS. DeMINTER: If you -- well, you
20 guys probably didn't see the original petition
21 that I had submitted on behalf of MOSA that was
22 geared toward a very generic categorical listing,

1 because we're not supposed to petition branding
2 products. So it was a very generic categorical
3 listing for paper, and it did just that,
4 including additives typically added to paper.

5 It was trying to broadly allow all of
6 -- well, maybe not all of, but the common
7 ingredients you would see in paper that's used as
8 a mulcher or compost feed stock, because if it's
9 allowed in those uses, those same ingredients are
10 allowed in those uses, why does it not logically
11 make sense to allow them to be used in the
12 manufacture of the pot.

13 It's used in the manufacture of an
14 envelope or a cardboard, you know, piece that I
15 can use on my farm as recycled paper. So that's
16 the challenge I think you're up against to some
17 degree. But if you -- if I were in your shoes
18 and really wanted to hone in on these, the
19 additives, I'd probably get with some of the
20 manufacturers out here that make these products,
21 and see what additive categories or types are
22 really necessary in the manufacture of these

1 types of products.

2 To not use additives, breaks down the
3 product maybe and there's input that they could
4 give you that would be helpful in determining
5 which additives you want to consider.

6 MR. CHAPMAN: Thank you, Jackie.
7 Thank you. We're going to have to move on now,
8 but thank you for your comments.

9 MS. DeMINTER: All right, thank you.

10 MR. CHAPMAN: Up next is Rudy Amador,
11 followed by Richard Mathews. Rudy, if you can
12 start with your name and affiliation for the
13 record.

14 MR. AMADOR: Yes good afternoon. My
15 name is Rudy Amador, I work with Dole Tropical
16 Products, and I'm Director of Sustainable
17 Agriculture there.

18 I want to start off by thanking the
19 Board, because I'm a bit cut off there at the
20 end. So thank the Board first for your service,
21 NOP for hosting, and Michelle, I wish I had five
22 percent of your organizational skills, and I'd be

1 a much better employee.

2 I'm basically here today to talk about
3 the importance of ethylene for the tropical fruit
4 products that we produce and export to the United
5 States. We basically have been working with
6 organic bananas for about 25 years, organic
7 pineapples for about 15. We work basically in
8 those five countries that are on my slide there.

9 I wanted to point out that I'm
10 slightly biased because I'm from Costa Rica, and
11 may mention them more than the other countries
12 during this talk. But I would want to point out
13 that we also work with organic fair trade bananas
14 and Organic fair trade pineapples, and that is
15 relevant to my exposition here and we'll explain
16 at the very end.

17 You'll be hearing probably tomorrow
18 from some growers that came from Costa Rica to
19 explain how they use ethylene in pineapples. I
20 just want to say that it's basically the most
21 important agricultural practice in pineapple
22 production. Ethylene is used to trigger

1 flowering and that has impact on determining the
2 ability to produce weekly values, also the
3 ability of controlling pests effectively.

4 So without ethylene in pineapples,
5 there wouldn't be pineapples basically. And also
6 we work with ethylene in bananas. I don't know
7 if most people know this, but bananas are
8 harvested green and shipped green. They need to
9 be shipped green in order to survive the
10 transport period through the markets.

11 And when the bananas are out in the
12 markets there are facilities, ripening facilities
13 sometimes owned by retailers or other groups,
14 that will use ethylene to ripen the fruit and get
15 it to the supermarket with a uniform. Without
16 ethylene again in bananas, there wouldn't be a
17 banana product for the consumers.

18 Alternatives. There was a webinar
19 last week and there was someone from Dole, our
20 research director of Pineapples, that explained
21 the issue of alternatives. So you go back to the
22 information he provided last week. But I do want

1 to say that the ethylene's purpose was determined
2 by nature, so you really cannot replace ethylene.

3 What you can maybe try to do is try to
4 force the plants to produce more of their own
5 ethylene and get that same effect. But that will
6 be discussed also tomorrow by one of the growers
7 who's bringing some research that was done in
8 Costa Rica earlier in the year.

9 Regarding the international regulatory
10 situation, while ethylene is approved in organics
11 in the United States, by the European Union, by
12 Canada, in Costa Rica also, there's going to be
13 someone from the Ministry of Agriculture from
14 Costa Rica referencing that tomorrow.

15 Here I just wanted to point out that
16 within the codex system, it has also been
17 reviewed and the U.S. delegation has voted for
18 that. This is my last light. Basically the
19 impact of ethylene removal in the growing area,
20 the growers would be converting back into
21 conventional, which we don't want.

22 There would be a loss of thousands of

1 jobs in the source countries. There'd be no
2 organic pineapples or bananas for the U.S.
3 consumer in this case. Also, a loss of growing
4 market for retailers processors.

5 MR. CHAPMAN: Thank you for your
6 comments. I have to stop you there.

7 MR. AMADOR: Okay, yes.

8 MR. CHAPMAN: Harriet.

9 MS. BEHAR: What is the rotation crop
10 with pineapples?

11 MR. AMADOR: There is no rotation
12 crop. There's a fallow period that goes between
13 one crop and the next. Normally we use macuna
14 bean as a green manure between the crops.

15 MS. BEHAR: And how long is that
16 fallow period between growing? So a field could
17 be growing pineapple for ten years, maybe get
18 eight crops or something from it? It's not a
19 full year is it?

20 MR. AMADOR: It's a perennial.
21 Normally you can do two crops. So you will -- in
22 a farm, you basically have it separated in

1 sections. You'll be rotating around the
2 sections, so that that farm is going to be
3 producing product on a weekly basis to be able to
4 supply what the market needs.

5 MS. BEHAR: So what's the fallow time
6 between?

7 MR. AMADOR: It's going to depend --
8 in our country, it rains quite a bit. It's going
9 to depend a lot on weather. So if it's raining a
10 lot, the fallow period is going to be longer,
11 because you're not able to get in to prepare.
12 But it could be anywhere from six weeks to ten,
13 twelve, uh-huh.

14 MR. CHAPMAN: Dave.

15 MR. MORTENSEN: In reading through the
16 materials, it raised a question in my mind. When
17 you go into the marketplace in the Northeast, at
18 least the stores that my wife and I shop in,
19 organic bananas are always more green than the
20 conventional labeled bananas are by a good bit.
21 I've wondered, does that have anything to do or
22 the way or the amount of ethylene that's used in

1 the ripening process?

2 MR. AMADOR: Not in the case of
3 organic bananas. That's more an issue of how the
4 ripener wants to, or the supermarket that's
5 ordering the color that they want. So in that
6 particular market, they may want the bananas to
7 be greener. That's a decision that can be made.

8 In the case of pineapples, however, it
9 is true. When you see organic pineapples, the
10 shell color is essentially going to be green,
11 because in organics we cannot use a synthetic
12 that allows the degreening of the pineapples.
13 However, I would like to point out that the
14 inside of the organic pineapple is actually much
15 better than conventional, because the product's
16 going to be out there one or two weeks more.
17 You're going to have a sweeter pineapples, so
18 definitely go for organic pineapples when you see
19 them, even though they're green.

20 MR. CHAPMAN: Okay, thank you very
21 much. Next up is Richard Mathews, followed by
22 Jennifer Berkebile. Richard, if you'd start with

1 your name and affiliation.

2 MR. MATTHEWS: Richard Mathews,
3 Executive Director of the Western Organic Dairy
4 Producers Alliance. First of all, I want to
5 thank you for considering our comments,
6 encouraging you to relist the livestock
7 materials.

8 Now shifting gears, in 2000, we were
9 asked to include split operations in the final
10 rule. We also included a provision that once
11 something left organic for conventional
12 management, that it could not come back. Why am
13 I telling you this?

14 Because we have a certifier who was
15 allowing organic farmers to convert organic
16 calves born of organic mothers on an organic
17 operation to conventional, for raising as
18 conventional for nine to twelve months, and then
19 conversion back to organic.

20 We filed a complaint on August 16th.
21 On October 1st, we were told that the case was
22 closed with no action. This is not a policy

1 issue. This is about violations of Section
2 201(a)(5) and Section 236(b)(1). These are
3 willful violations. Now historically the
4 National Organic Standards Board has been more
5 than willing. They haven't been shy about
6 telling the USDA when they are wrong.

7 It is now your time to tell the USDA
8 that they are wrong, the decision is
9 unacceptable, and the decision needs to be
10 reversed immediately.

11 (Applause.)

12 MR. MATHEWS: Any questions?

13 MR. CHAPMAN: Ashley.

14 MS. SWAFFAR: I have a sunset question
15 for you. On hydrated lime, you were like the
16 only person that realized we asked anything about
17 maybe changing the annotation in the future. Do
18 you think any of your producers, if they could
19 use hydrated lime for deodorizing animal waste,
20 would that be a beneficial tool for them or not?

21 MR. MATHEWS: I'm not in it -- well,
22 I can't really say that it would be a beneficial

1 tool.

2 MS. SWAFFAR: Thanks.

3 MR. CHAPMAN: Harriet.

4 MS. BEHAR: Can you speak to the
5 economic impact on that decision that that's had
6 on the members of WODPA, which you are the
7 executive director of?

8 MR. MATHEWS: There's only one reason
9 -- well, there's two reasons for any farmer to do
10 this. First of all, it's cheaper to raise calves
11 conventionally than it is organically. They save
12 about a \$1,000 per animal.

13 So it's an economic incentive tool.
14 It also allows them to disregard the feed
15 provisions, the livestock healthcare provisions,
16 the livestock living conditions provisions, the
17 pasture provisions.

18 So while these certifiers are allowing
19 these two violations, there are multiple
20 additional violations. It all gets back to
21 economics. Who wants to do it? The very large
22 farmers want to do it, those who have trouble

1 raising animals. The good farmers don't need
2 that.

3 And so every farmer who is following
4 the rules is placed at an economic disadvantage.
5 You multiply that thousands of dollars a head by
6 tens of thousands of animals, you are creating
7 severe economic disadvantage to all the farmers
8 who comply with the rules.

9 MR. CHAPMAN: Thank you. Thank you,
10 Richard. Briefly Dan.

11 DR. SEITZ: You know, would you just
12 please close the lop on what you've just
13 described? So the herd is transitioned back to
14 conventional, and then is the whole herd sold to
15 some farming operation to then be -- as a one-
16 time sale to be used as -- for organic milking
17 operation? What happens to that herd once it's
18 converted back to conventional?

19 MR. MATHEWS: Well, it's not a
20 conversion of a whole herd. It's an organic
21 operation that is already required to follow the
22 regulations.

1 Now they might fall in the two track origin
2 of livestock issue, where those who had taken
3 advantage of the feed exemption are now required
4 to only source organic animals as replacements or
5 additions to their herd, versus the one that's at
6 100 percent organic feed, who because of a glitch
7 in the regulations has been allowed to
8 continuously transition animals that were
9 conventional to organic, to either build the herd
10 or provide replacement animals.

11 This isn't that at all. This is an
12 organic operation seeking economic advantage, and
13 wanting to skirt the rules because it's easier
14 than it is to raise an organic calf. It's that
15 simple. Does that answer your question?

16 DR. SEITZ: Not quite, because what
17 happens at the end of that year with those
18 animals that were transitioned back to organic?
19 I don't understand --

20 MR. MATHEWS: They go right into the
21 milking herd. Yeah, they go into organic
22 livestock management.

1 DR. SEITZ: Oh I see, okay. So meat
2 sales, milking sales, whatever that may be.
3 Okay, great. Thanks.

4 MR. CHAPMAN: Yeah, Richard thank you.
5 Thank you for your comments. I have a question
6 for Jenny, which might be the same question for
7 you, which is Jenny, can you provide any more
8 context to what we just heard?

9 DR. TUCKER: Sure, and you know, I
10 think I'm going to spend a little bit of time on
11 this, because I've been getting a lot of
12 questions on this one. So I think I'm going to
13 share sort of broadly how we think -- how when we
14 get a complaint like this, what do we do? What
15 are we thinking about?

16 Because I think having the community
17 understand the thought process and the kinds of
18 questions that I and our team ask might help in
19 this dialogue.

20 So when we get a complaint, I
21 mentioned this morning one of the things that we
22 look at is it is -- is it a policy complaint or

1 is it -- so that involves looking at sort of the
2 regs, looking at the evidence, looking at what we
3 have.

4 When it is a complaint that comes in,
5 we think often okay, what would happen, just
6 hypothetically, what would happen if we did an
7 adverse action here? So what is that? That's
8 like a proposed suspension or a proposed
9 revocation. So let's -- let's just follow that
10 thread on hypothetically what would happen.

11 And then the next important question
12 would be and what if that was appealed? So
13 proposed adverse actions are appealed, often
14 appealed. So then what would happen on appeal?
15 What would the lawyers on the opposite side
16 argue? So how would they read the regulations in
17 a different way than we read the regulations, and
18 is that argument -- is that argument actually
19 believable?

20 I have to look at that question from
21 the viewpoint of an administrative law judge, who
22 is not in the organic community, doesn't

1 necessarily know about organic production, is a
2 lawyer, is an administrative law judge who is
3 going to take all the evidence.

4 So first, I've been doing appeals now.
5 I've reviewed appeals for the program with
6 certifiers actions against operations that are
7 appealed to the program level.

8 I've been looking at those for about
9 five years now. So we're getting actually pretty
10 good at anticipating what the arguments might be
11 on the other side. We have to be very cognizant
12 of what would happen on an appeal should we lose,
13 because we have been down that road before. So
14 setting policy through complaints and the appeals
15 process, we've really tried very hard to avoid
16 doing that, okay.

17 Now that's sort of the general comment
18 on complaints. Now I'm going to turn in terms of
19 origin of livestock, and again am putting myself
20 in the viewpoint of a lawyer for another, for an
21 opposite, an administrative law judge. What
22 would likely get pointed to in an origin of

1 livestock case is the documented known regulatory
2 uncertainty in this part of the regulations.

3 So this is an area where NOSB has made
4 recommendations. This is an area where the OIG
5 has had findings in two organic milk audits
6 related to origin of livestock, and he has
7 written that there is differences in
8 interpretation between certifiers. We have a
9 proposed rule that was published in 2015. That
10 rule has not been finalized.

11 So there's a whole trail of documented
12 regulatory questions on origin of livestock,
13 where it's sort of acknowledged in a lot of
14 places, including proposed rule, that there's
15 regulatory uncertainty in this particular area.
16 Now there are lots of different areas where one
17 could be uncertain in this area, and people can
18 reference very specific parts of that section of
19 the rule and say this is why we are right.

20 Then other people are going to point
21 at other parts of that section and say this is
22 why we are right. We have to have full

1 confidence that we would win -- and an
2 administrative law judge to feel comfortable
3 taking that kind of action, given the uncertainty
4 with origin of livestock. We did not feel
5 comfortable and we can't take an adverse action
6 in this particular case.

7 Now there are many parts of the
8 livestock regulations, such as the pasture
9 standard, which are much more regulatorily clear.
10 We have a final pasture rule, it's been passed.
11 We've done a whole bunch of training on it. That
12 right now, when we're looking at the Pasture
13 Compliance Project, the Dairy Compliance Project,
14 that's where our focus is, is in the parts of the
15 regulation that are very clear on grazing season,
16 on all the different aspects of pasture.

17 That's -- and antibiotic use and all
18 sorts of other parts of the organic regulations
19 related to livestock that are very, very clear.
20 That is where we are focusing. Origin of
21 livestock is regulatorily uncertain ground. A
22 good lawyer is also going to look back at OFPA

1 and see what OFPA has to say about origin of
2 livestock.

3 So those are all of the kinds of
4 variables that we have to take into account when
5 we look at specific complaint. So I just want to
6 share. I know a lot of you will disagree, and
7 you'll tell me where in the regulations you're
8 looking.

9 The lawyer has a whole other different
10 perspective on that. We have to be pragmatic in
11 how we view these complaints, and setting policy
12 through complaints and appeals processes is very
13 dangerous territory indeed. Thank you.

14 MS. BEHAR: So Jenny, would there be
15 -- what is the thought within the program for
16 dealing with this regulatory uncertainty?

17 DR. TUCKER: Origin of livestock, I
18 tell everyone this too, so thank you for allowing
19 me to sing this song again. So I appreciate the
20 challenges, particularly for small producers in
21 writing letters to the Secretary. It doesn't
22 mean it doesn't work. So there are lots of

1 avenues for communicating.

2 This is not an area -- honestly, I
3 hear a lot about origin of livestock, not an area
4 that has been heard as a distinct and incredibly
5 high priority issue back at USDA. So generally
6 when an origin of livestock gets brought up to
7 us, it is one of a list of many things.

8 We want you to do this, this, this,
9 this and this and origin of livestock is
10 somewhere in that last. Sometimes it's even
11 number one, but it's one of, you know, five or
12 ten things. And so there has not yet been a --
13 when you think about all the different things
14 that people are interested in, origin of
15 livestock has not been the clear melody in the
16 song.

17 And so I would as an industry, as a
18 community, this is an area you want to get behind
19 and say here are the economic arguments for
20 finalizing a livestock, origin of livestock rule.
21 Here are the benefits, here are costs, here's
22 what we thought of the proposed rule in 2015.

1 That communication is helpful.

2 Then the administration can make a
3 decision on what it wants to do moving forward.
4 But until we hear, the administration hears a
5 unified voice on this topic, it is hard to --
6 it's not on the regulatory agenda right now.

7 MR. CHAPMAN: Thank you, and I think
8 we need to move on with public comment at this
9 time. Just so folks know we were planning to
10 take a break at 3:45, but given how far we are
11 behind on the schedule, we will be working
12 through that break. So if any Board members do
13 need to take a break, please feel free to stand
14 up and quietly walk out of the room and do what
15 you need to do.

16 Right now, we're tracking to wrap up
17 around six o'clock. There is another event in
18 this hotel that is using the public space around
19 six o'clock, so I would really like to wrap up at
20 that time, because it's going to become loud and
21 distracting.

22 So I guess I am looking at the Board

1 members and saying choose your questions wisely,
2 because I will probably start curtailing the
3 questions asked to keep us moving along, and to
4 give every commenter a chance to speak. With
5 that, Jennifer is up and then Jenny Cruse is on
6 deck. Jennifer, if you can start with your name
7 and affiliation.

8 MS. BERKEBILE: Sure. Good afternoon.
9 My name is Jen Berkebile. I'm the Materials
10 Program Manager at Pennsylvania Certified
11 Organic. We certify over 1,500 organic crop,
12 livestock and handling operations in the U.S.
13 Today, I'll be reiterating my written comments on
14 marine materials, paper pots, sodium citrate and
15 sodium chloride for the generation of chlorine
16 dioxide gas.

17 First regarding marine materials. I
18 really appreciated Emily's comments at the NOC
19 meeting on this topic, especially addressing the
20 slippery slope fear, because that is also my
21 fear.

22 I want to express my support for a

1 working group on this topic. I would like to see
2 it not just address the wild crop standard, but
3 also the availability of organic marine
4 vegetation.

5 Some aquatic plants are listed at
6 205.606. But if they are possibly not
7 commercially available for use in processed
8 products, are they commercially available for use
9 in crop inputs? I would also like to see the
10 working group recommend an adequate time period
11 for manufacturers and producers to come into
12 compliance with these annotations should they be
13 adopted.

14 Next, I want to add my voice in with
15 those who are requesting that the NOP reconsider,
16 and that the NOSB support a reconsideration of
17 the use up period for paper pots. In allowing
18 paper as we control and as a compost additive,
19 you as a Board have already said that paper used
20 as a crop input is compatible with organic
21 farming, and safe for human health and the
22 environment.

1 Therefore, there is little to no risk
2 to organic integrity to extend the used up
3 deadline. Next, I want to express my concern
4 with a listing for sodium citrate for use in
5 blood meal. PCO has traditionally considered
6 anti-coagulants and other processing aids to be a
7 part of the standard of identity of blood meal,
8 and therefore outside of the scope of review.

9 This can be thought of similarly to
10 paper, which is allowed without additional review
11 of the processing aids used during the
12 manufacturing process. I'm very concerned that a
13 specific listing for sodium citrate will
14 unintentionally lead to the prohibition of blood
15 meal, due to the presence of other non-approved
16 processing aids.

17 I recommend that the NOSB either
18 consider processing aids in blood meal as a part
19 of the standard of identity, therefore allowing
20 them without review, or take a look at all
21 additives in blood meal and address them
22 together.

1 Finally, I want to comment on sodium
2 chloride for the generation of chlorine dioxide
3 gas. As written, this annotation is a little
4 confusing, and it is unclear whether or not we
5 need to review other ingredients used during the
6 generation process. I want to reiterate that the
7 listing for chlorine dioxide at 205.605(b) should
8 be updated to read "Chlorine dioxide gas
9 generated from sodium chloride." Thank you all
10 for your time and dedication on the Board, and
11 for the opportunity to comment here today.

12 MR. CHAPMAN: Emily.

13 MS. OAKLEY: Thank you for your
14 written comments on -- why does it seem like --
15 here we go. Is that better, okay. Thank you for
16 your comments on marine materials, and you said
17 of the 19 crop inputs in aquatic plant extracts
18 that PCO approves, seven already contained
19 certified organic marine macroalgae.

20 MS. BERKEBILE: Uh-huh.

21 MS. OAKLEY: Could you tell me a
22 little bit about that?

1 MS. BERKEBILE: I believe the -- from
2 my memory, I believe they contained thoravin
3 kelp, which is a certified organic and I think
4 unrealistic as well. And then some of the other
5 ones that I mentioned, we don't know whether
6 they're certified organic, whether they're
7 marine, so any other questions?

8 MR. CHAPMAN: Thank you.

9 MS. BERKEBILE: Thank you.

10 MR. CHAPMAN: Up next is Jenny Cruse,
11 followed by John Hendrickson on deck. Jenny, if
12 you can start with your name and affiliation.

13 MS. CRUSE: I'm Jenny Cruse with the
14 Accredited Certifiers Association. Our primary
15 mission is to ensure consistent implementation of
16 USDA organic regulations through collaboration,
17 education of accredited certification agencies.
18 We have 53 certifier member organizations.

19 Today I'd like to highlight a few key
20 points from the ACA's written comments that were
21 submitted to the docket. Our comments are
22 generated through working group participation,

1 survey feedback and Listserv discussion. On the
2 subject of paper pots, we support an amendment to
3 the National List that would enable the use of
4 paper as a mechanism for planting and
5 transplanting.

6 Using paper in this way could reduce
7 reliance on plastics, and it seems that the
8 environmental effects would be comparable to use
9 of paper for mulch or compost feedstock, both of
10 which are currently allowed. We also support an
11 extended deadline for discontinuing the allowance
12 of paper pots as this petition process plays out.

13 Please note that these comments relate
14 to paper only. We're not advocating for the use
15 of any commercial paper padding systems or for
16 the allowance of any additional materials used in
17 the manufacturing of those systems.

18 On the subject of organic seed search
19 requirements, we applaud the Crop Subcommittee's
20 stated intention to develop language that allows
21 farmers to use non-organic seeds, as long as they
22 demonstrate their organic seed search is valid

1 and improving. However, the proposed language
2 doesn't seem to yield that level of flexibility.

3 Any final language should discuss
4 improvements in terms of long-term patterns as
5 opposed to year over year comparisons, and should
6 be careful about the "and" language. Requiring
7 improvements searching sourcing and use of
8 organic seed every year is actually a fairly
9 inflexible requirement if read literally.

10 Sometimes use cannot be improved in a
11 given year, even if searching and sourcing
12 improvements are grateful of this. We'd also
13 like to repeat that seed search quality would be
14 greatly enhanced through use of a comprehensive
15 organic seed database funded or established by
16 the NOP.

17 On the CACS Subcommittee proposal on
18 training and oversight of inspector and
19 certification review personnel, what I'd like to
20 highlight is that the ACA has done extensive work
21 on this question, on the question of inspector
22 training and qualifications over the last couple

1 of years.

2 We attached the ACA guidance on
3 inspector qualifications to our written comments.
4 This was developed by a working group on the
5 topic in 2017 and early 2018, with participation
6 from Margaret Scoles of IOIA. IOIA also worked
7 with the ACA to develop a survey of accredited
8 certifiers on the subject of inspector training,
9 and the survey had a response rate of over 50
10 percent.

11 One interesting observation is that
12 around a quarter of responding organizations
13 reported that they did not have a mechanism in
14 place to ensure timely feedback on the inspection
15 reports of new inspectors, once they had
16 completed basic training and field training.

17 The ACA board agreed it would be
18 useful for all certifiers to put such mechanisms
19 into place. A redacted version of those survey
20 results was attached to our written comments, and
21 we believe the information can be useful to
22 consider as the conversation moves forward. Than

1 you all for your hard work and for the
2 opportunity to comment.

3 MR. CHAPMAN: Harriet.

4 MS. BEHAR: Thank you for sharing that
5 survey. That's going to help us with setting our
6 priorities, I think, on what should be done in
7 the inspector training.

8 I had a specific question. You had an
9 evaluation form in there for evaluating
10 inspectors specifically, and I was wondering how
11 these certifiers felt if there was a consensus to
12 all share the same evaluation form, so they could
13 then be used universally between agencies or not?

14 MS. CRUSE: We included that as an
15 attachment to the instruction document that was
16 published early in 2018, as a tool for optional
17 use. I know that there are some certifiers who
18 would be in favor of using it and others who have
19 forms that they've developed that they prefer to
20 use too. So I don't feel I could get a unified
21 response to that.

22 MR. CHAPMAN: Thank you. Up next is

1 John Hendrickson with Stephanie Rose on deck.

2 John, if you can start with your name and

3 affiliation.

4 MR. HENDRICKSON: John Hendrickson,
5 organic farmer, Stone Circle Farm and owner of
6 small farm works, a business dedicated to
7 providing innovative tools to small farms,
8 including paper pots. I want to begin by
9 bringing up a procedural issue regarding the
10 petition I submitted to get paper pots allowed on
11 organic farms.

12 I was told I could not submit a
13 petition for a specific commercial product.
14 Rather, the petition had to be for a generic
15 material. With Jackie DeMinter, a petition on
16 the generic use of paper as a paper pot was
17 submitted in advance of the deadline to get on
18 the agenda for this meeting.

19 This petition was returned with a
20 request for detailed information about the
21 particular paper pot product that I use and sell.
22 This seemed to go directly against petition

1 guidelines. The strategy I was trying to follow
2 was first to get the use of paper as a paper pot
3 added to the organic rule, and then the company
4 that makes the paper chain pots would submit
5 their specific product to OMRI for review.

6 This seemed a logical and procedurally
7 correct path to follow. This strategy was based
8 on my reading and understanding of the technical
9 reviews that have been conducted on paper, which
10 acknowledge that a great many synthetic materials
11 are known to be components of recycled paper,
12 given that recycled paper is a waste stream
13 product.

14 As you know, paper has commanded the
15 attention of the NOSB in the past. Several
16 technical reviews have been conducted. The
17 technical reviews are quite clear that paper and
18 paper products, including recycled paper, contain
19 a great deal of additional ingredients. The
20 decision to allow recycled paper has been made
21 knowing that the exact materials contained in
22 recycled paper are largely unknown, as well as

1 about any clear definition of recycled.

2 As the rule reads now, the paper pots
3 that I sell could be shredded and applied to the
4 ground as mulch or added to the compost pile, but
5 not used as a paper pot. I would like to
6 contrast the use of these thin strips of paper
7 pots with the use of plastic mulch. Does anyone
8 know how many miles of plastic mulch are used on
9 certified organic farms?

10 I don't either. But the use of small
11 amounts of paper certainly pales in comparison to
12 the environmental impact of manufacturing,
13 applying, removing and disposal of plastic mulch,
14 which I have chosen not to use on my farm. Not
15 allowing paper chain pots will have severe
16 economic impacts, including but not limited to
17 farmers facing a very difficult decision between
18 using paper pots or continuing to be certified,
19 certifiers losing clients, farmers having
20 unusable equipment and unused inventory of paper
21 pots, farmers dropping crops from their rotation,
22 farmers having to hire more labor in a tight

1 labor market, or buy new and different equipment
2 for transplanting, and reverting to less
3 efficient and less productive planting systems.

4 The company that makes the paper chain
5 pots is committed to compliance with organic
6 standards. They are willing and eager to submit
7 their product for OMRI review. I urge the NOP to
8 allow the use of paper chain pots on organic
9 farms while the NOSB considers the petition,
10 conducts any reviews deemed appropriate, and
11 votes at a future meeting. Thank you.

12 MR. CHAPMAN: Thank you. I'm going to
13 actually put someone from the program on the
14 spot, but probably Devon to speak to the first
15 petition. Devon's not here. Maybe Clarissa.
16 And I was somewhat involved and I think Steve was
17 somewhat involved, so maybe he'd be able to speak
18 to it as well.

19 I do not believe it was rejected
20 because it was a generic. It was rejected
21 because it wasn't deemed sufficient at the time
22 of submittal, which is a common occurrence in a

1 first-time petition. Is that --

2 MR. HENDRICKSON: Yeah, I acknowledge
3 that, and believe that to be correct. However,
4 asking for the very specific ingredients and
5 amounts of those ingredients in the particular
6 product that I sell seemed to go above and
7 beyond. The purpose of that petition was just to
8 get the use of paper as a paper pot added to the
9 organic rule.

10 MR. CHAPMAN: Yeah, Steve do you want
11 to --

12 MR. ELA: Yeah. I mean I agree with
13 what you're saying, although it comes back to
14 kind of the adhesive issue too, of adding
15 adhesives after the paper is made was I think
16 where we got hung up a little bit.

17 MR. CHAPMAN: Yeah.

18 MR. ELA: It's a tough one, and I
19 agree with Tom. I think I did see that original
20 submission. It just wasn't complete enough for
21 us to act on it.

22 MR. CHAPMAN: Yeah, and then once we

1 get the information, there was a need to seek
2 information to determine how similar or different
3 this was from paper, and without knowing that,
4 it's hard to come to that conclusion. It would,
5 you know, there is a strong likelihood that you
6 would have gotten questions from the program or
7 from the subcommittee asking for that
8 clarification later. That would have also
9 delayed the petition.

10 And then just so you're aware, even an
11 earlier submission may not have been sufficient
12 time to make this meeting as well. The general
13 time line on, I would say on average a petition
14 at a minimum is generally about 18 months.

15 MR. HENDRICKSON: Which is again why,
16 why I would really urge the extension of the
17 deadline on use of the paper pots, to allow the
18 petition process to unfold.

19 MR. CHAPMAN: Fair point. Questions
20 from the Board? I see Dave.

21 MR. MORTENSEN: Yeah, thank you John.
22 We heard from two callers last week in the public

1 comment about the displacement of the need for
2 and reliance upon the plastic phase, because and
3 I for me personally, that clinches it, because I
4 have seen many farms with just piles of plastic
5 in one of the fields, because they simply don't
6 know what to do with the plastic that they've
7 generated.

8 So to me this is a very clear need
9 that we -- with both environmental and economic
10 impacts. Thank you for outlining that.

11 MR. HENDRICKSON: Thank you.

12 MS. BEHAR: Do you know if anyone in
13 the United States is looking to produce these
14 pots? There were some public comments about
15 looking at domestic production.

16 MR. HENDRICKSON: I can tell you that
17 a company in Japan is very interested in opening
18 up a factory here in the United States.

19 MR. CHAPMAN: All right.

20 MR. HENDRICKSON: I would note that in
21 addition to the paper part of the system, there
22 are a bunch of other components which you know we

1 are manufacturing all of those things
2 domestically now, creating jobs in our local
3 community.

4 MR. CHAPMAN: Thank you. Okay. Next
5 up is Stephanie Rose, followed by Nate Lewis.

6 MS. ROSE: I'm Stephanie Rose. I'm
7 representing PQ Corporation, a manufacturer of
8 aqueous potassium silicate. I would like to
9 address some of the concerns raised by the Crop
10 Subcommittee during the sunset review of
11 potassium silicate.

12 I appreciate the huge task that is set
13 before the NOSB and overall, and I agree that
14 materials on the approved list should have clear
15 benefits to the organic grower. Those are where
16 I supply the NOSB with five independent studies,
17 four journal articles and 13 additional extension
18 publications covering a variety of crops,
19 including blueberries, basil, oranges, grapes,
20 haps and pumpkins, for efficacy as a fungicide
21 and an insecticide.

22 Another benefit to the organic farmer

1 is minimizing resistance through rotational use
2 with other fungicides and insecticides of
3 different mechanisms. Regarding systematic
4 mechanisms concerns. It is important to keep the
5 application method in mind when discussing this
6 critical issue. Potassium silicate for disease
7 and insect control is applied via foliar
8 application.

9 As noted in several Michigan State
10 Agricultural Extension publications, potassium
11 silicate is a contact protected-type fungicide
12 applied to the foliage. A reference utilized in
13 Technical Report 2014 on aqueous potassium
14 silicate is a study on the horticultural effects
15 of silicon on sunflowers.

16 The article states that the effects on
17 sunflower traits depend upon source and
18 concentration of silicon. Silica when applied to
19 the soil is taken up by the roots and deposited
20 in cells. The efficacy data submitted to you
21 that I mentioned earlier utilized foliar
22 application, not root application.

1 The applications are not the same, the
2 mechanisms are not the same, and this should be
3 kept in mind when reviewing information on the
4 effects of silicon on plants.

5 Two additional studies referenced in
6 the 2014 Technical Report on aqueous potassium
7 silicate. One, a study conducted by Mattson on
8 morphological traits of several flowering plants
9 utilized a substrate drench. The second, an
10 article by Mayland and Shewmaker discussing the
11 changes in forage. Again, the silica is taken up
12 by roots. Foliar application is a different
13 application and different mechanism. It works as
14 a surface protectant.

15 Regarding the concerns over digesting
16 silica to containing plants, unfortunately the
17 information is limited and conflicting, even
18 within the article by Mayland and Shewmaker.
19 Therefore, I was not able to find a clear answer
20 for you. In this case, it feels best to revert
21 back to the basics of silicon accumulation in
22 plants.

1 It is well-documented that the persona
2 of silica that a plant will accumulate varies
3 from plant to plant, from .1 percent to 10
4 percent. Grasses and rices are very high
5 accumulators, while plants like tomatoes
6 accumulate so little they're considered non-
7 accumulators.

8 MR. CHAPMAN: Questions? Asa.

9 MR. BRADMAN: I just want to clarify.
10 So you're saying that when you're applying it as
11 a foliar application it's not necessarily being
12 incorporated into the structure of the plant,
13 that it's acting as a contact pesticide against
14 fungi or perhaps other pathogens? And can you
15 tell us what the mechanism is against those
16 pathogens, and is there any structural change to
17 the plant?

18 MS. ROSE: No. It is my understanding
19 that when it's taken up into the plant, deposited
20 in the cells, it's taken up through the root
21 system, okay. The MSU Extension was clear to
22 state in most of their publications that this

1 should be applied, that it's a surface
2 protectant, but it's not a systematic.

3 There were several comments about
4 these are systematic mechanisms, silica matrix is
5 not. So we guessed through their efficacy trials
6 that they have determined that it is definitely
7 not, doesn't act as a systematic.

8 MR. BRADMAN: Okay. By systematic,
9 you mean systemic?

10 MS. ROSE: Sorry, sorry. Systemic.
11 It isn't real clear what the mechanism is.
12 There's some theories over providing a surface,
13 you know, a coating on the surface of the plant,
14 and I guess I can't answer all of your questions.

15 MR. BRADMAN: Okay.

16 MS. ROSE: That is what I found in
17 doing research. I'm looking on what
18 recommendations are and what studies have said.

19 MR. BRADMAN: Okay, thank you.

20 MR. CHAPMAN: Dave.

21 MR. MORTENSEN: Yeah. In the
22 technical literature that we were looking at, and

1 I was the lead on this particular one, there was
2 -- it was strongly implied that the compound was
3 systemic, whether it was applied to the soil or
4 applied to the leaves.

5 And the implications in what we were
6 reviewing and what we had in front of us were
7 that uptake in the leaves was occurring across
8 the cuticle and across and through the stomata,
9 so that the compound actually enters the inside
10 of the plant.

11 That was what gave rise to our concern
12 about human exposure to vegetable, green leafs,
13 and such grown and harvested after being sprayed.

14 I also would like to thank you for the
15 additional efficacy data that you provided,
16 because we did not have very much to look at when
17 we were going through this process, and it's
18 helpful to see that now. We did not have very
19 much of that before. Thanks.

20 MR. CHAPMAN: Thank you. Up next is
21 Nate Lewis, followed by Taylor Ivy. Nate, if you
22 can start with your name and affiliation.

1 MR. N. LEWIS: Sure. Thanks for
2 taking all these public comments. My name's Nate
3 Lewis. I'm an associate consultant with Wolf
4 DiMatteo and Associates, and an organic farmer in
5 Olympia, Washington, where we hold all four
6 scopes of certification, a thing I like to tell
7 everybody.

8 But the comments I'm going to present
9 are on behalf of Wolf DiMatteo and Associates.
10 So, I'm here instead of Bill Wolf, but I wanted
11 to bring forward one of his themes, which is to
12 always think like an earthworm, and bring it
13 through a couple of items.

14 So, when evaluating films and fibers
15 like paper pots or compost feedstocks or
16 biodegradable mulch film, think like an
17 earthworm. Use those ASTM standards that are
18 incorporated by reference for biodegradability
19 and compostability. They're good, objective
20 tools for at least looking at that aspect of
21 those particular materials.

22 Earthworms don't care about whether or

1 not the product's bio-based. They care about
2 whether it is biodegradable. And so we encourage
3 you as a Board to take another look at that mulch
4 film recommendation and listing around the bio-
5 based content, because right now there are no
6 products available on the market to replace
7 polyethylene film.

8 Liquid fish products. They're good
9 for the soil. Organic farmers use them and need
10 them. We support its continued renewal. We also
11 agree with the Crop Subcommittee that taking a
12 look at sustainability of our planet's fisheries
13 is absolutely a critical element in these
14 reviews. It's a bigger issue than what can be
15 covered in the sunset. So, come back to that,
16 but let's complete the sunset process for liquid
17 fish.

18 Sodium nitrate, not so good for
19 earthworms. The time has come, I think, for the
20 USDA to move forward on rulemaking to completely
21 prohibit sodium nitrate. There's consensus in
22 the organic community that it should be

1 prohibited. It's bad for the soil. There's
2 growing concerns about perchlorate contamination,
3 which poses a health risk, and there's really no
4 reason for continued delays in the process.

5 And, with that, maybe we can regain a
6 little bit of time for future commenters, unless
7 there's questions.

8 MR. CHAPMAN: Questions for Nate?

9 MS. SWAFFAR: So, what do you think we
10 should do about paper pots moving forward?

11 MR. N. LEWIS: Paper pots. Well, I
12 guess there's -- the way I look at it, there's
13 two competing tracks of issues here. One is an
14 enforcement issue, which has to do with the
15 deadline for stopping its use; and there's
16 another issue, which is the petition process and
17 the adding it to the National List process.

18 So the first one, the enforcement,
19 that's really USDA's job. I see the program as
20 the one who runs enforcement, and I actually
21 agree with personally -- and I should say I'm
22 going to take off my Wolf DiMatteo hat and put on

1 my small farmer hat, because we haven't really
2 come to a position on these specific issues at
3 Wolf DiMatteo and Associates.

4 But as a small farmer and a
5 stakeholder, I actually agree with USDA's
6 interpretations of the regulations. I think
7 being strict about how we look at those
8 annotations is critical. I don't like to see
9 people massaging annotations to allow for
10 materials.

11 So I agree with their approach, but I
12 also see -- I see it as a correctable violation
13 if someone would use a paper pot in the future.
14 Paper is on the National List. It's just
15 restricted for use. So it's not a prohibited
16 substance application, in my view, and if someone
17 used paper pots past the deadline, they would
18 certainly deserve to receive a notice of non-
19 compliance. But I don't believe that their land
20 would should be out of certification for three
21 years, requiring that transition.

22 So I don't use paper pots on my farm,

1 but if I did and it was as important to me as I'm
2 hearing it is to a lot of other farmers, I would
3 just keep using it and I would get that non-
4 compliance and I would appeal that non-compliance
5 -- or I'd wait 'til it was a proposed suspension,
6 and I would appeal that proposed suspension and I
7 would just drag it out until you all got it on
8 the National List.

9 (Laughter.)

10 MR. N. LEWIS: But that's what I would
11 do. If someone chooses to withdraw
12 certification, if you all could also agree that
13 it was not a prohibited substance application,
14 then they could come back into certification when
15 it was on without that three year wait period.

16 I think the National List process is
17 cumbersome, and Steve you brought up a lot of
18 those issues, but I don't think you should
19 request a TR. You have all the information you
20 need to make that determination with the current
21 TR.

22 MR. CHAPMAN: Steve, briefly.

1 MR. ELA: Actually, it's a quick
2 question for Paul, I guess, that Nate brought up.
3 I mean, in terms of the sodium nitrate issue,
4 where it's sitting on your desk, and I think a
5 public commenter brought up the issue, that it's
6 not in our sunset reviews now because we pulled
7 it. I mean, the Board voted to pull it out. So
8 actually it's kind of this weird thing where we
9 have this product still being used, but we're not
10 reviewing it because it's on your desk. But if
11 we're going to keep using it, we should review
12 it.

13 DR. P. LEWIS: The sodium nitrate
14 issue is a complicated issue. We've had
15 conversation internally in the department about
16 the issue overall, but there's really no movement
17 on the issue at this time. That's really where
18 we are on this issue.

19 MR. CHAPMAN: I have a question for
20 Nate about sodium nitrate. Has Wolf DiMatteo and
21 Associates considered petitioning to have it
22 listed on 205.602?

1 MR. N. LEWIS: Well, it sort of seems
2 like it would be redundant to -- there is already
3 an outstanding recommendation to have it
4 prohibited. So I don't quite understand what
5 would be accomplished by an additional
6 recommendation to have it prohibited. I think at
7 this point it's --

8 MR. ELA: It would potentially get it
9 back on the work agenda.

10 MR. N. LEWIS: Oh, I see. So then the
11 NOSB could continue to agree that it should be
12 prohibited.

13 MR. ELA: And then put it back out
14 there under a new --

15 MR. N. LEWIS: It's certainly
16 something worth considering.

17 MR. CHAPMAN: Anything else for Nate?
18 Nate, thank you.

19 MR. N. LEWIS: Thank you.

20 MR. CHAPMAN: Up next is Taylor Ivy,
21 followed by Kelly Abbott. Taylor, if you could
22 start with your name and affiliation.

1 MR. IVY: Okay. My name is Taylor
2 Ivy. I work for Isagro USA. We are the
3 manufacturer of AITC. AITC is not new to this
4 Board. I've seen the petition submitted to you,
5 and it's both thorough and detailed in terms of
6 technical details supporting its approval.

7 Instead of rehashing those details,
8 I'd like to briefly highlight where we see the
9 greatest needs at the grower level. One, for
10 remediation of soil that has become infested by
11 newly emerging or exotic plant pathogen or
12 nematode. A good example of this would be the
13 increased prevalence of macrophomina in
14 strawberries in Florida five to ten years ago.

15 It was relatively unheard of, not
16 talked about very much. Last year, I
17 unfortunately found myself standing in a five-
18 acre field of strawberries that had over 20
19 percent plant mortality due to macrophomina, and
20 there are plenty more examples close to that one.

21 Two, over time, even with proper
22 growing practices, certain diseases in nematode

1 populations can grow to levels well beyond
2 control of current organic treatments. In
3 instances like these, the farmer is forced to
4 either stop farming or to become a conventional
5 farmer.

6 An example is verticillium wilt. This
7 is a very big problem in California.
8 Microsclerotia, which is the resting structure
9 for verticillium, can remain viable for 14 years
10 in the soil. So rotation is clearly not an
11 option.

12 And, three, as stated by our first
13 public commenter, plant nurseries who wish to
14 sell to organic growers in some situations have
15 no way, other than conventional fumigants, to
16 reduce disease and nematode populations to a
17 point where the plants can not only survive until
18 they're sold but also pass soil tests to attain
19 nursery stock certifications.

20 We believe that AITC, given its
21 natural origin in the plant family Brassicaceae
22 and biopesticide status is clearly the best

1 solution for organic growers who are in desperate
2 need of significant disease and nematode
3 reduction. Thank you, and I have no comments on
4 paper pots.

5 (Laughter.)

6 MS. BEHAR: Steve.

7 MR. ELA: So, as a Board, I mean, and
8 as an organic industry, there are certain organic
9 natural products that we don't allow because
10 they're so broad spectrum, and those we put on
11 the prohibited list. This is a very broad
12 spectrum material. It does come from a natural
13 source, I agree, and so it's very tempting in
14 that sense.

15 But it's non-selective. It's broad
16 spectrum. I mean, those big red flags for me.
17 And so can you address how you would respond? I
18 mean how is it really different than metam sodium
19 or some of these others? It's still killing most
20 things in the soil.

21 MR. IVY: Understood. When you -- we
22 have a growing body of evidence, and we would I'm

1 sure be willing to share that data with you in
2 the not-so-distant future, that after treatment
3 with AITC, the microbial diversity is much
4 greater than after a treatment with something
5 like, as you said, MITC or methyl bromide or Pic
6 60. You know the list.

7 So we have growing evidence showing
8 that, although it is considered broad spectrum
9 against many disease pathogens and nematodes, it
10 is leaving more of the non-pathogen communities
11 intact. And there is certainly research that
12 shows that the primary way that this product is
13 broken down in the soil is as a food source to
14 certain microbes. I hope that helps.

15 MS. BEHAR: Any other questions?

16 Dave?

17 MR. MORTENSEN: I was curious. So, a
18 number of mustard cover crop species produce high
19 concentrations of various forms of
20 isothiocyanates. And I was curious, do you have a
21 sense for the concentration relative to a cover
22 crop concentration of isothiocyanates in the soil?

1 MR. IVY: Cover crops achieve much
2 lower concentrations than one can achieve with
3 AITC in its purest form. With AITC, you can
4 adjust your concentration to whatever is
5 necessary for the targeted pathogen or nematode
6 species. It can be as low as you'd like it to be
7 or as high as you choose for it to be.

8 With a cover crop, it can only achieve
9 a low concentration of AITC and your results will
10 be limited, based on research and what we've
11 seen.

12 MS. BEHAR: Emily.

13 MS. OAKLEY: I'm a huge cover crop
14 fan, so I appreciate your comment, but you can
15 also grow cover crops over successive years to
16 achieve results over the long term.

17 MR. IVY: Understood, thank you.

18 MS. BEHAR: Thank you. Abby
19 Youngblood's on next with Kyla Smith on deck.
20 Please state your name and affiliation.

21 MS. YOUNGBLOOD: Hi. This is Abby
22 Youngblood, Executive Director at the National

1 Organic Coalition. And I'm extremely grateful
2 for the work that you do as members of the NOSB.

3 On marine materials, NOC agrees with
4 many other commenters that the NOSB and National
5 Organic Program should establish a working group
6 to develop standards for seaweed harvesting as a
7 crop input and to provide more clarity for algae
8 that is certified as organic under the wild crop
9 harvesting practice standard.

10 NOC strongly opposes the petition for
11 silver dihydrogen citrate, and we urge you to
12 reject it. SDC poses health and environmental
13 risks, particularly the risk of increasing
14 resistance to antibiotics in silver-based
15 medications.

16 Although the petition does not mention
17 nanotechnology, nanosilver would be allowed if
18 the petition is approved without an annotation to
19 exclude it, and we're dismayed that, despite the
20 NOSB's recommendation in 2010 to prohibit
21 nanotechnology in organic production, there's
22 still no clear prohibition.

1 In the absence of a clear prohibition,
2 persistent oversight from public interest groups
3 is required to ensure that the NOSB does not
4 approve a petition for an engineered
5 nanomaterial. It also results in extra work for
6 the Board in reviewing petitions that include
7 nanomaterials.

8 On excluded methods, thank you to the
9 Board for keeping this issue front and center,
10 and for continuing to review additional next
11 generation GE techniques. We support the
12 proposal to list embryo rescue in plants as not
13 an excluded method.

14 Regarding transposons, at this time
15 NOC is arguing that only transposons developed
16 via use of in vitro nucleic acid techniques
17 should be determined to be excluded. Transposons
18 that induce via chemicals or irradiation should
19 be considered under the method of induced
20 mutagenesis.

21 NOC recognizes that seed used in
22 organic production is at risk for genetic

1 contamination, and we want to make progress in
2 our efforts to protect the genetic integrity of
3 crops. Much of the proposal on genetic integrity
4 transparency makes sense to us, but our members
5 do have some specific concerns with this
6 proposal, and we urge the NOSB to work to address
7 those concerns as you look at moving this effort
8 forward.

9 The need to collect more data has been
10 an overarching theme in the efforts to develop a
11 seed purity standard, and one way to begin data
12 collection would be to start a pilot project with
13 organic seed suppliers for a set timeframe, as we
14 describe in more detail in our written comments.

15 This would provide anonymous
16 information on the range and concentration of
17 contamination levels, and would inform
18 conversations about a reasonable threshold level.

19 Regarding GMO vaccines, we need to
20 ensure that organic livestock producers continue
21 to have access to essential vaccines, while at
22 the same time bringing consistency and

1 eliminating GMO vaccines in organic that are
2 unnecessary. GMO vaccines are being used in
3 organic production, but they should first be
4 reviewed and then placed on the National List.
5 For a variety of reasons, that's not happening.

6 Thank you.

7 MR. CHAPMAN: Thank you. Questions
8 for Abby? Asa.

9 MR. BRADMAN: If I remember correctly,
10 your comments also opposed the delisting AITC?

11 MS. YOUNGBLOOD: Yes.

12 MR. BRADMAN: And I'm curious if you
13 have any thoughts about a proposal earlier today,
14 or suggestion, that it should be considered for
15 nursery as perhaps a way to avoid the use of more
16 harsh, prohibited materials. Is there a possible
17 window there that you might support or agree with
18 or understand? I'm curious about that.

19 MS. YOUNGBLOOD: I would need to bring
20 that back to our membership before I could answer
21 that, but I can discuss that further with some of
22 our members and see if that came up in our

1 conversations.

2 MR. CHAPMAN: Any other questions?

3 Thank you, Abby. I believe we skipped
4 over Kelly Abbott. Kelly Abbott's next, and on
5 deck is Kyla Smith. Kelly, if you can start with
6 your name and affiliation.

7 MS. ABBOTT: Thank you and good
8 afternoon, or good evening I guess at this point.
9 My name is Kelly Abbott, and I am the technical
10 supervisor for farm and livestock at Oregon
11 Tilth. I've been in the organic certification
12 industry for nearly 20 years, but I am going to
13 admit this is my first NOSB meeting.

14 I appreciate this opportunity and
15 would like to focus my brief comment period on
16 genetic integrity transparency of seed. Oregon
17 Tilth fully recognizes that GM contamination is a
18 top concern and that there are increasing
19 challenges of preserving genetic integrity in
20 organic seed, especially in corn seed.

21 Oregon Tilth supports the principle of
22 collecting data to establish a baseline of GM

1 contamination in organic crops, and Tilth would
2 also support such a baseline as an essential
3 measure to establishing GM thresholds under the
4 NOP.

5 Oregon Tilth cannot, however, support
6 a mandate of purity disclosures for corn seed.
7 Such a mandate would create an increased
8 liability for labeling patented GM content,
9 increase financial burdens on the farmers, and
10 ultimately could lead to a reduction in organic
11 seed diversity and availability. We would like
12 to recommend that the data being continuously
13 collected by private verification companies be
14 utilized on a confidential level, as has been
15 offered at previous NOSB meetings.

16 We encourage the Board to continue the
17 conversation to increase transparency with
18 regards to GM contamination in organic corn seed
19 production, but feel this mandate is premature
20 and will cause not only financial burdens but
21 affect the availability of organic corn seed
22 diversity. Thank you for your consideration.

1 MR. CHAPMAN: Questions? Harriet.

2 MS. BEHAR: Are you aware of -- do you
3 certify any corn seed dealers or growers?

4 MS. ABBOTT: I don't have the facts on
5 how many we have, but --

6 MS. BEHAR: Are you aware,0 are any of
7 them doing any genetic testing and sharing that
8 information with their growers or buyers of the
9 seed?

10 MS. ABBOTT: I'd be happy to put you
11 in contact with our program manager, who drafted
12 this guidance. I think we're more looking at a
13 broad base of how this would affect corn
14 production and farmers in general.

15 MR. CHAPMAN: Thank you. Up next is
16 Kyla Smith, with Molly Schaus on deck. Kyla, if
17 you can start with your name and affiliation.

18 MS. SMITH: Good afternoon. My name
19 is Kyla Smith. I am the interim co-executive
20 director at Pennsylvania Certified Organic. PCO
21 certifies over 1,500 operations throughout the
22 U.S. I'll be commenting on the Crop

1 Subcommittee's proposal on strengthening the
2 organic seed guidance, as well as the Materials
3 Subcommittee's proposal on genetic integrity of
4 seed.

5 Regarding the seed guidance proposal,
6 I'll focus my comments specifically on the
7 proposed regulatory language change. We did
8 provide written comments that cover the entire
9 proposal. We support the concept of continuous
10 improvement in the use of organic seed, and the
11 proposed language definitely conveys that
12 sentiment.

13 That said, as certifiers we hang our
14 hat on the specific language in the regulations.
15 Placements of commas and ands versus ors do
16 matter. When the language is unclear, certifiers
17 interpret and enforce inconsistently. This leads
18 to these items needing to be further clarified
19 through best practice documents, program handbook
20 documents, or may even find their way back onto
21 your work plan, all of which take additional time
22 and resources.

1 The proposed language does not give
2 certifiers enough flexibility to both enforce
3 continuous improvement and evaluate the
4 operator's entire system. The proposed language
5 will lead certifiers to issue non-compliances
6 when an operation, one, does not improve in the
7 areas of searching, sourcing, and use due to the
8 use of the word "and" versus "or," and does not
9 improve the -- or does not -- and/or, it's
10 important -- or does not improve their seed usage
11 every year for circumstances outside of their
12 control, such as seed being unavailable due to
13 crop failure.

14 PCO supports the recommended language
15 submitted by the Accredited Certifiers
16 Association. The ACA's proposed language would
17 allow farmers some flexibility while still
18 improving in the areas of searching, sourcing, or
19 use, which seems to meet the intent of the
20 subcommittee.

21 We don't have a preference on when in
22 the process this wordsmithing takes place, but

1 encourage that it does take place prior to being
2 published in the Federal Register in the final
3 form so we don't come up against the barriers of
4 implementation and enforcement that I've
5 described.

6 Regarding the genetic integrity of
7 seed proposal, PCO respectfully asks for the
8 proposal to go back to subcommittee for
9 additional work. The document references
10 sampling and/or testing, obtaining purity levels,
11 et cetera, but lacks clarity on who will hold
12 these roles and responsibilities, which is
13 critical to give clear intention and direction to
14 the NOP. Thank you all for your service and for
15 the opportunity to comment.

16 MR. CHAPMAN: Questions? Dave.

17 MR. MORTENSEN: I just wanted to say
18 thank you for pointing out the need to be precise
19 with language, and also for the constructive
20 input. We're trying to get this moving, and the
21 feedback was very helpful and constructive.
22 Thank you.

1 MS. SMITH: Thanks.

2 MR. CHAPMAN: Emily.

3 MS. OAKLEY: I'm curious, as a grower,
4 if I use organic seed and couldn't obtain it the
5 next year due to a crop failure, would you truly
6 interpret this language to mean that I wasn't
7 compliant? Because when I read comments like
8 that, I'm a little surprised, just because it
9 seems like an overly strict interpretation of
10 that language and a punishment of the farmers.
11 So just more of a curious question.

12 MS. SMITH: I think that that's part
13 of the problem, that some certifiers could take a
14 very strict interpretation and some would not. I
15 mean, we've heard about issues in vagueness of
16 language in regards to origin of livestock and
17 pointing at different parts of the regulation,
18 and being very confident in one's interpretation.
19 And so unless it is uber-clear, we'll run into
20 that issue.

21 MS. OAKLEY: Thanks.

22 MR. CHAPMAN: Thank you.

1 MS. SMITH: Thank you.

2 MR. CHAPMAN: Up next is Molly,
3 followed by Michael Crotser. Molly, if you could
4 start with your name and affiliation.

5 MS. SCHAUS: Yeah. Molly Schaus,
6 Minnesota Food Association. My name is Molly
7 Schaus, and I work as the farm director for
8 Minnesota Food Association, which is a program of
9 the Food Group here in Minnesota. Thank you for
10 hearing this statement.

11 Minnesota Food Association operates a
12 100-acre certified organic farm in the St. Croix
13 Valley that serves as a land-based education
14 program and business incubator for beginning
15 farmers who want to start their own independent
16 vegetable farms. We seek to address the specific
17 barriers that beginning farmers of color and
18 immigrant farmers face, barriers that are
19 amplified over the ones faced by their white
20 counterparts.

21 Currently, there 11 farm teams at
22 Minnesota Food Association, all of them certified

1 organic. There are farmers from seven different
2 cultures. We offer land access, weekly classes,
3 in-field technical assistance, and access to
4 shared equipment and infrastructure. We seek to
5 offer training that is tailored to farmers'
6 individual goals. We also provide education and
7 market access by aggregating a CSA from all
8 growers in the program, operating two weekly
9 farmer's markets, and fulfilling wholesale
10 contracts. The farm is a diverse and supportive
11 community.

12 I tell you all this because Minnesota
13 Food Association and the farmers in the education
14 program believe deeply in the value of organic
15 certification. It is a tool that allows them to
16 access markets with higher price points, and it
17 is a tool that allows farmers to build health
18 within their own communities.

19 I am asking you to consider how the
20 decisions you make impact beginning farmers of
21 color and immigrant farmers.

22 How can you work to build increased

1 access to organic certification? For example,
2 long-term land access is a major challenge that
3 beginning farmers of color and immigrant farmers
4 face as they seek to become certified organic
5 since there are systemic barriers to access of
6 land and credit. With less capital and credit,
7 it is much more difficult to purchase land.

8 For the last three years, we have
9 offered technical assistance to a farmer who
10 wanted to transition his farm and his parents'
11 farm to organic. He was participating in our
12 classes, implementing organic growing practices,
13 filling out a Practice Organic packet, learning
14 how to keep the records needed for certification,
15 and where to find organic inputs.

16 However, he was unable to begin the
17 three-year transition to organic because he and
18 his family were never able to get a land lease
19 that lasted longer than the one season. This
20 past season, he was finally able to become
21 certified organic when a small portion of
22 certified land became available for rent, but he

1 still does not have long-term land access.

2 How can organic standards and
3 regulations address the needs of farmers who want
4 to transition to organic, but cannot because they
5 do not have stable land access? I want to farm
6 in a community where all farmers have equitable
7 access to organic certification and the tools
8 required to achieve it.

9 I believe that as you, the members of
10 the National Organic Standards Board, consider,
11 revise, and write regulations, you have a
12 responsibility to consider how what you do will
13 impact all members and potential members of the
14 organic growing community and to address the
15 specific needs of beginning farmers of color and
16 immigrant growers. Thank you.

17 (Applause.)

18 MR. CHAPMAN: Thank you. Any
19 questions for Molly? Asa.

20 MR. BRADMAN: I've worked with groups
21 in California that have programs that sound
22 similar to yours and also raised similar issues.

1 I've been on the Board now for two years. I'm
2 curious if you have any concrete suggestions on
3 how we could further some of the issues that
4 you've raised, and maybe, if not, that's
5 something that we could get input on from the
6 organic community.

7 MS. SCHAUS: I have a couple of ideas.
8 I figured someone was going to ask this. So,
9 barriers that come up often are the cost of
10 certification, and while there are cost-share
11 programs in many states, and we're fortunate to
12 have one in Minnesota, it's a reimbursement
13 rather than a lowering of the upfront cost. So
14 the farmer still have to front at least \$700,
15 even if they're going to get 550 of that back.

16 I personally think there's some worth
17 in considering transition time when there are
18 institutional barriers that prevent people from
19 having land access, that it's unreasonable to
20 expect that people can farm like -- to require
21 that someone farms for three years on the same
22 piece of land if they want -- like if it's

1 because they cannot access land for longer than
2 that.

3 I think that there are also -- some of
4 the regulations involving saved seeds and saved
5 seeds that are culturally important to someone or
6 to their family, when certifiers might not see
7 the cultural importance of like that specific
8 plant versus like -- so like what's the
9 importance of this mustard that you're growing
10 versus like one that seems identical that you can
11 buy in the seed catalogue, but actually it's like
12 the seeds that you brought over from your country
13 of origin? Those are a couple of ideas that I
14 have.

15 I also just think that it's important
16 when you write rules and change rules that you
17 consider impacts that spread throughout the
18 system.

19 MR. CHAPMAN: Dave, is it a question
20 or a statement?

21 MR. MORTENSEN: Yeah. I guess just
22 add on, that in Lincoln, Nebraska where I work

1 and in Pennsylvania, one other thing that's
2 working and I don't know that we've ever thought
3 about how all this interfaces with the
4 regulations, I know I haven't, is the use of
5 public land and all sorts of interesting and
6 creative leases on public land.

7 So if we were able to think more
8 actively about local and regional use of public
9 lands, that it enables a lot of cool things to
10 happen in a longer term.

11 MS. SCHAUS: Yes. Yeah. I mean we,
12 for the most part, all of us farm on land that
13 was taken, and so how can you restore common
14 spaces?

15 MR. MORTENSEN: Thank you for raising
16 this important issue.

17 MS. SCHAUS: Thank you.

18 MR. CHAPMAN: Thank you. Up next is
19 Michael, followed by Anne Ross. Michael, if you
20 could start with your name and affiliation.

21 MR. CROTSEY: I'm Michael Crotser, the
22 certification manager at CROPP Cooperative. I

1 want to thank the NOSB and the National Organic
2 Program for the opportunity to speak. My first
3 comment will be to discuss the feasibility of
4 requiring organic seaweed in organic crop
5 production.

6 Certification of seaweed as a
7 fertilizer would provide a level of verification
8 that does not currently exist. Mandating organic
9 seaweed use would assure that the harvest
10 maintains or improves the natural resources of
11 aquatic ecosystems. However, this would set up a
12 precedent that other natural materials may need
13 to be certified as a crop input.

14 Sourcing seaweed as a fertilizer is a
15 way to circumvent natural nutrient cycling that
16 organic farmers are expected to follow, and
17 encourages nutrient sourcing under an input-based
18 model. Classifying seaweed as an organic input
19 does not address this concern. Using fresh water
20 materials is a commendable suggestion and should
21 be explored. Eurasian milfoil is infestive weed
22 infesting fresh waters and should be considered.

1 A working group would benefit
2 measuring the environmental impact of harvesting
3 marine algae. Experts could provide harvest
4 strategy guidelines to mitigate environmental
5 risk. The working group may conclude that marine
6 algae should not be used in organic production.

7 My second comment will focus on
8 strengthening and unifying enforcement. Working
9 with roughly 2,000 farmer members and numerous
10 organic certifiers, we have a unique window to
11 see varying policy and practices of standard
12 enforcement.

13 It is critical that we maintain our
14 market and our commitment to consumers. We
15 encourage the May 2018 Organic and Enforcement
16 Action Plan for pasture surveillance program and
17 the interim instruction document on organic
18 inputs. We also support the collaborative work
19 on the proposed rule for strengthening organic
20 enforcement.

21 We welcome rulemaking transparency and
22 the opportunity to provide input. As a member of

1 the Accredited Certifiers Association, we support
2 the working group in developing a best practices
3 guide. We must maintain a strong USDA Organic
4 seal. We are seeking solutions for uniform
5 standard enforcement.

6 We recognize three paths forward
7 listed in the order of logical preference. One,
8 encourage the NOP to publish clear and consistent
9 expectations. This will direct a level playing
10 field among certifiers.

11 Two, ask accredited certifiers to
12 comply with ACA best practices to create
13 certifier consistency.

14 And, three, anticipate additional
15 third party certification to meet consumer and
16 business needs.

17 We appreciate the work accredited
18 certifiers do. As a former certification
19 specialist, I know what hard work it is, and
20 their work is critical. I want to thank the
21 National Organic Program and the National Organic
22 Standards Board for their time today.

1 MR. CHAPMAN: Thank you. Questions?
2 Emily.

3 MS. OAKLEY: Just a comment. I just
4 want to say that I appreciated your comments on
5 marine materials. So, thank you.

6 MR. CHAPMAN: Thank you.

7 MR. CROTSER: Thank you.

8 MR. CHAPMAN: Up next, we have Anne
9 Ross, followed by Nicole Dehne. Anne, if you
10 could start with your name and affiliation.

11 MS. ROSS: Good afternoon. My name is
12 Anne Ross, and I'm an attorney working as a farm
13 policy analyst and researcher for the Cornucopia
14 Institute. One of my primary job duties has been
15 to investigate import fraud.

16 Not long ago, I received an anonymous
17 tip that a certified organic grain operation
18 located in Eastern Europe hired an individual
19 away from their certifier to manage the certified
20 operation's organic division.

21 According to the tipster, this
22 individual was scheming with his former

1 colleagues who were still employed by the
2 certifier to fraudulently label conventional
3 grain as organic. Anonymous tips providing such
4 limited information can be dead end or can take
5 time to sort out, but I think there's a lesson
6 here.

7 When a certifier's employees,
8 consultants, or board members are subsequently
9 hired or retained by an operation that the
10 certifier certifies, there's a potential conflict
11 of interest. This is also true when employees or
12 consultants change employment in the opposite
13 direction, from certified operation to certifier,
14 or even between the NOP and these entities.

15 To be fair, the revolving door can
16 function in a good way, in that it allows
17 different sectors of the organic community to
18 make good use of the knowledge and expertise of
19 individuals who have dedicated their work in this
20 area, but only if we make rules and policies
21 around a conflict that could arise. Why?
22 Because potential conflicts of interest are in

1 fact conflicts of interest only if they're
2 effectively managed. So let's manage these
3 conflicts of interest by formally recognizing
4 they exist, and are a risk factor for certifier
5 fraud, and let's manage them through disclosure
6 requirements.

7 The NOP should recognize if a
8 certified operation hires an individual
9 previously employed by a certifier, there's a
10 potential conflict we need to manage. If a
11 certifier hires a former NOP employee as an
12 employer-consultant, there's a potential conflict
13 we need to manage. The NOP should require that
14 the nature of these relationship be made publicly
15 available.

16 Requiring public disclosure would be
17 consistent with other industries, professions,
18 and governing bodies that require disclosure in
19 potential conflict situations. These industries
20 recognize that this is not a hypothetical
21 problem, but circumstances faced by good people
22 by virtue of their positions and capitalized upon

1 by a few unethical opportunists.

2 Adding this risk factor and disclosure
3 requirement helps in fraud detection. It
4 protects all of the ethical certifiers and their
5 employees from the appearance of bias, and it
6 increases public confidence in the organic label.
7 Addressing the revolving door scenario allows us
8 to focus on productive conflicts, conflicts of
9 ideas, and not on breaches of trust that all too
10 often accompany unmanaged conflicts of interest.

11 I've also submitted written comments
12 on this topic which includes more detailed
13 recommendations. Thank you very much for your
14 time and service to this Board, and I'm happy to
15 take any questions.

16 MR. CHAPMAN: Good timing. Emily.

17 MS. OAKLEY: Thank you. I read your
18 comments that were detailed. How would you
19 suggest that the NOSB approach this issue? Or do
20 you consider this a NOP level concern?

21 MS. ROSS: I think the NOSB can
22 address it and that there's a very easy way to

1 address it now, and that's to simply add former
2 employees as a risk factor. Employees are
3 already in there as a risk factor in the
4 documents. I think it's page 39 or 40. So
5 simply add former employees there. That's the
6 first step.

7 And I think eventually we need to move
8 to disclosure. It helps public trust, and rarely
9 do I think transparency is a bad thing. So I
10 think the very first step is just simply add
11 former employees in what the committee has
12 already put forth.

13 MR. CHAPMAN: Thank you.

14 MS. ROSS: Thank you.

15 MR. CHAPMAN: Up next is Nicole,
16 followed by Phoebe Judge. Nicole, if you could
17 start with your name and affiliation.

18 MS. DEHNE: Hi. My name is Nicole
19 Dehne. I'm the certification director for
20 Vermont Organic Farmers, LLC. We're the
21 certification program of NOFA Vermont. We
22 certify over 700 organic producers in Vermont.

1 I'd like to thank the NOSB for all of your hard
2 work, and the opportunity to give comment today
3 on a number of agenda items.

4 We strongly support the CS's work on
5 the proposal to strengthen the NOP's organic seed
6 guidance. We agree that progress towards full
7 adoption of organic seed and planting stock is
8 far from being achieved, but we commend the
9 NOSB's work to clarify the goal of continuous
10 improvement and to work with certifiers and
11 growers to implement reasonable measures towards
12 this goal.

13 It was clear that the CS adopted
14 public comments on this revised proposal, and we
15 agree with the changes made and feel the result
16 is a much stronger proposal. One area that
17 remains problematic is the section that states
18 that non-organic seed can be used if there's no
19 organic seed available of equivalent variety with
20 the desired level of purity from GMO
21 contamination.

22 It seems unlikely that organic seed

1 will have more GMO contamination than
2 conventional seed. It also seems unrealistic to
3 expect non-organic seed companies to tag their
4 seed with information about GMO purity. If only
5 organic seed companies comply with this new
6 requirement, then producers will be choosing
7 between a known contamination and an unknown
8 contamination, and this may encourage the use of
9 non-organic seed.

10 Paper pots. I am going to comment.
11 The paper pot transplanting system has been a
12 game-changer for our producers, our veggie
13 producers in Vermont. The 2017 TR on newspaper
14 and other recycled paper contains descriptions of
15 inks and adhesives used in these products. This
16 means that these items were considered when this
17 material was reviewed and approved for addition
18 to the National List. We strongly feel that if
19 newspaper and other recycled paper is allowed for
20 organic crop production, that paper used for
21 paper pots should be allowed for organic crop
22 production as well.

1 We strongly recommend that the NOSB
2 ask the NOP to extend the current allowance of
3 the material through the 2019 growing season to
4 allow the NOSB to review the petition and to
5 officially approve the material for use on
6 organic farms and for the NOP to engage in
7 rulemaking.

8 Also, in general, we support the
9 efforts of the CACS to outline areas of
10 improvement for the training and oversight of
11 inspector and certification review personnel. We
12 support the document and its goals, but would
13 like to ensure that the NOSB recommends to the
14 NOP that the program develop and articulate
15 skills and knowledge that inspectors and
16 certification staff need, but allow for
17 flexibility for how those skills and knowledge
18 are taught. Thank you.

19 MR. CHAPMAN: Harriet.

20 MS. BEHAR: On the transparency of the
21 genetic contamination, do you feel it's more
22 beneficial for farmers to know what the amount of

1 genetic contamination might be, or would it be
2 better just as it is now and they just don't
3 know? But then, of course, neither way would
4 they lose their certification on the final crop.
5 But, I mean, would it cause stress by knowing or
6 something? I don't know.

7 MS. DEHNE: I think it's the
8 usefulness of the knowledge. So, if we're using
9 it but we're using it to make a choice, then if
10 we don't have the other information then the
11 choice -- then the knowledge isn't very useful.

12 So, in this particular case, when
13 we're saying, you know, that if you can choose
14 non-organic seed if the organic seed has some GMO
15 contamination, it's only valuable if we can
16 compare apples to apples.

17 MS. BEHAR: The proposal requires all
18 seed planted on organic land to have that level
19 of purity testing. So either the organic seed
20 supplier, the non-organic seed supplier, or the
21 farmer would have to produce that. So there
22 would be knowledge at some point in the system.

1 MS. DEHNE: Right.

2 MS. BEHAR: You know, I guess it
3 wouldn't have to happen before purchase, if they
4 chose. I mean, it would be nice to know, but
5 they would know at some point and it would be
6 part of the organic system plan, so we would have
7 that database to track.

8 MS. DEHNE: Harriet, if that were the
9 case, that would make sense. I'm just concerned
10 about how we regulate the non-organic seed
11 producers, even if it's on the organic farm.
12 That seems tough to me.

13 MR. CHAPMAN: Thank you. Up next is
14 Phoebe Judge, followed by Kiki Hubbard. Phoebe,
15 if you could start with your name and
16 affiliation.

17 MS. JUDGE: My name is Phoebe Judge
18 and I work at Vermont Organic Farmers as a
19 materials review specialist. I appreciate all
20 the thoughtful work from the members of the NOSB
21 and for giving me the comment period.

22 Firstly, I would like to stress how

1 vitally important it is for organic producers to
2 be able to utilize technologies that help them
3 improve efficiency and reduce labor. The paper
4 pot transplanting system is one of these
5 technologies. Expanding the use of paper,
6 including paper from hemp, to be used as a tool
7 applied to the soil as a planting aid, including
8 as pots and seed tapes, is a low-risk expansion
9 from allowing newsprint and recycled to be a
10 compost, feedstock, or a mulch.

11 We strongly encourage the NOSB to ask
12 the NOP to extend the use-up period for these
13 paper pots to the end of 2019 growing season
14 while the Crops Subcommittee reviews the petition
15 to add paper as a planting aid.

16 Secondly, as the NOSB considers the
17 use of vaccines as a tool for organic livestock
18 production, it is important to ensure the use of
19 non-organic -- non-GMO vaccines are used when
20 possible. VOF currently allows only the use of
21 non-GMO vaccines on our certified farms. We
22 require vaccine manufacturers to sign an

1 affidavit stating which of their vaccines comply
2 with the NOP's and the NOSB's working definition
3 of non-GMO production methods.

4 We would, however, support the use of
5 GMO vaccines in the case when no non-GMO vaccine
6 is available for the treatment of a disease. If
7 GMO vaccines are to be used in organic livestock
8 production, however, we ask that the vaccines be
9 added to the National List according to
10 205.600(a).

11 Lastly, we appreciate the NOSB's
12 attention to the issue of Bisphenol A, or BPA, in
13 food packaging, and support continued research
14 into alternatives to BPA.

15 More broadly, we urge the NOSB to add
16 the issues of phthalates in organic milk and
17 dairy to its work agenda. Phthalates are a group
18 of chemicals that have been linked to a wide
19 range of reproductive and neurodevelopmental
20 problems, and they have no place in the
21 consumer's idea of what organic means.

22 We share the concerns of our

1 colleagues at the Center for Food Safety and
2 elsewhere that phthalates in organic milk and
3 dairy products must be reduced. We would also
4 ask that the NOSB request input from organic
5 dairy producers and processors on which products
6 and suppliers they use for equipment containing
7 phthalates, and to generate ideas for reducing
8 these contaminants. Thank you again for your
9 work.

10 MR. CHAPMAN: Questions? Ashley.

11 MS. SWAFFAR: So, when you ask those
12 vaccine manufacturers, what are the excluded
13 methods that you list?

14 MS. JUDGE: We supply the affidavit
15 that includes both the NOP's definition of a non-
16 GMO production method and the NOSB's working
17 definition.

18 MS. SWAFFAR: So transposons aren't
19 included in that at this time?

20 MS. JUDGE: No.

21 MR. CHAPMAN: Thank you.

22 MS. JUDGE: Thanks.

1 MR. CHAPMAN: Up next we have Kiki
2 Hubbard, followed by Pat Kerrigan. Kiki, if you
3 could start with your name and affiliation.

4 MS. HUBBARD: Good afternoon. My name
5 is Kiki Hubbard. I'm the director of advocacy
6 and communications for Organic Seed Alliance. We
7 are a mission-driven organization that works
8 nationally to ensure that organic farmers have
9 the seed they need through research, education,
10 and advocacy.

11 My comments today will touch on three
12 topics. First, OSA is very supportive of the
13 work of the Materials Subcommittee to provide
14 further clarity on excluded methods. We support
15 passing this proposal and encourage ongoing
16 clarification of definitions per our written
17 comments.

18 Secondly, OSA appreciates the hard
19 work of the Materials Subcommittee on the
20 incredibly complicated issue of genetic integrity
21 and transparency. We're pleased to see ideas
22 fleshed out to move the conversation forward, and

1 we're especially happy to see a proposal that
2 underscores the importance of sourcing organic
3 seed when it's available to incentive broader
4 adaption of this critical organic input, when
5 appropriate.

6 However, we do believe the proposal
7 could use more work, and we don't support it at
8 this time, at least as written.

9 OSA agrees that testing for and
10 monitoring unwanted trace developed through
11 excluded methods is a very good idea, and we hope
12 to gain more clarity about the purpose and goal
13 of this proposal and how the findings of any type
14 of pilot project would be used at this meeting.

15 Lastly, we're very happy to see the
16 organic seed proposal back on the agenda this
17 week. It's important that these changes to the
18 seed regulation and guidance for certifiers move
19 forward for a number of reasons, not the least of
20 which is to spur the development of more organic
21 varieties that help organic farmers stay
22 competitive and adapt to changing climates and

1 markets.

2 As the availability and diversity of
3 organic seed increases, policy must follow suit
4 to ensure increased adoption in a measurable and
5 reasonable way. OSA supports amending the
6 organic regulations at Section 205.204 as written
7 in the proposal.

8 We support most of the proposed
9 changes in NOP's organic seed guidance document.
10 In particular, we're pleased to see stronger
11 language that emphasizes the role of on-farm
12 trials and aspects of non-compliance. We do
13 offer additional changes to the guidance to
14 consider in our written comments.

15 OSA's research team has seen first-
16 hand that many organic farmers are increasingly
17 conducting organic variety trials, and so this is
18 why we're again very pleased to see trials
19 highlighted in the proposal.

20 Seed represents profound potential for
21 transforming how we farm and what we eat, and it
22 helps the success of farmers who grow

1 organically. So we're very grateful that the
2 Board continues to make organic seed policy a
3 priority, and we're very grateful for your time
4 and your service. Thank you.

5 MR. CHAPMAN: Harriet.

6 MS. BEHAR: I want to thank you, Kiki,
7 for helping me get in touch with seed suppliers
8 and flesh out some of those issues on both of
9 those proposals, organic seed and genetic
10 integrity. That was very useful to talk with
11 them, and I think some of them will be giving
12 public comment as well.

13 MS. HUBBARD: You're welcome.

14 MR. CHAPMAN: Emily.

15 MS. OAKLEY: Thanks, Kiki. I have a
16 question on the Crop Subcommittee's proposal to
17 amend NOP Guidance 5029 and the section for
18 4.1.3(d), contamination from GMO consideration:
19 non-organic seed can be used if there is no
20 organic seed equivalent available, or available
21 of equivalent variety with the desired level of
22 purity from GMO contamination.

1 Because, as an organic farmer, we've
2 discussed this in the Crop Subcommittee, you
3 know, organic seed is about more than just non-
4 GMO contamination. So I'm curious. As was
5 mentioned in the previous comment, how extensive
6 do you think this would be applied? Do you think
7 this is a very small percentage of seed that
8 would be opted out for in this level of the
9 document?

10 MS. HUBBARD: Well, it of course
11 depends by crop type. We are concerned -- first
12 of all, I think already that can be used as a
13 reason to not source seed that has levels of
14 contamination that might exceed a desired level
15 of purity, especially per a contract agreement or
16 something like that.

17 We are concerned with that existing
18 language right now, with references to seed
19 purity, because there currently is not an
20 industry standard. And so it is potentially
21 confusing and potentially difficult to enforce.
22 So as this time, we recommend leaving out

1 references to seed purity until the Material
2 Subcommittee provides more direction through
3 their work on genetic integrity and transparency.

4 MR. CHAPMAN: Thank you, Kiki. Up
5 next is Pat, followed by Alan Lewis.

6 MR. KERRIGAN: Hello everyone. I'm
7 Pat Kerrigan with the Organic Consumers
8 Association and Regeneration Midwest. To NOSB
9 members, NOP staff and organic stakeholders,
10 Southwestern Minnesota organic vegetable farmer
11 Jack Hedin recently quoted in The Star Tribune as
12 saying "In an era of more frequent and more
13 intense rainfall during the growing season, the
14 Upper Midwest may simply be becoming too wet, too
15 often to grow fresh market vegetables
16 profitably."

17 It's hard to imagine that many of us
18 will be left in 20 or 30 years, much less how the
19 industry can grow in response to consumer demand.
20 One of the most sobering editorials of the many
21 sobering editorials I've read this year.

22 His farm, Featherstone Farms, has been

1 instrumental in helping to build a thriving Twin
2 Cities organic food scene, which features dozens
3 of restaurants selling locally and organically
4 produced foods, and the largest food co-op
5 network in the country.

6 But as Jack Hedin points out, our
7 producers are facing a grave and growing climate
8 change threat. Climate change is the elephant in
9 the organic room, and we simply can no longer
10 ignore because it is not part of the NOSB work
11 agenda. We cannot continue to ignore what's
12 happening in the world around us and across the
13 Midwest.

14 Our climate change crisis and how the
15 organic community can respond needs to be a
16 perennial part of the NOSB's work plan.
17 Improving soil health and soil resilience is not
18 only good land stewardship, but it's becoming
19 more and more critical for keeping both the soil
20 and those who farm it on the land.

21 We are well underway, but have so very
22 little time and we have so much to accomplish.

1 We simply must accelerate our efforts. The good
2 news is that the soil solution is indeed under
3 our feet, and that the regenerative agriculture
4 movement is becoming all the rage all across the
5 country.

6 In my work with Organic Consumers
7 Association and Regeneration Midwest, I am so
8 fortunate to be able to spend my work days
9 learning about and speaking with regional
10 regenerators, along with their governmental, non-
11 profit, academic and business allies.

12 Through the 13 state Regenerative
13 Midwest Network, we are building consumer
14 awareness and market demand, as well as market
15 infrastructure for regenerative organic products
16 in the Midwest and beyond.

17 I'm encouraged and inspired by Midwest
18 regenerative leaders such as Gabe Brown and his
19 cover crop cocktails, David Brandt and Regi
20 Haslett-Marroquin, who are doing a fantastic job
21 in educating farmers and ranchers about the many
22 benefits of incorporating regenerative practices

1 into their operations.

2 And I'm very grateful for the work
3 that Minnesota Sustainable Farm Association, the
4 Minnesota Institute for Sustainable Agriculture
5 -- oh man, it goes so short. We can regenerate
6 soil health. We can do it. We have to do it and
7 we need to take a stand for soil. Thank you.

8 MR. CHAPMAN: Thank you, Pat. Any
9 questions for Pat? I'm not seeing any. Thank
10 you, Pat. Up next is Alan Lewis, and on deck is
11 Jay Feldman. Alan, if you can start with your
12 name and affiliation.

13 MR. ALAN LEWIS: Alan Lewis. I work
14 for Natural Grocers. It's a family-run health
15 food chain, 150 stores, all certified organic in
16 19 states west of the Mississippi. Organic is
17 meaningless. I've been on the road almost every
18 day in October and every day I hear somebody tell
19 me that organic is meaningless and it's
20 infuriating, and I know it's infuriating to all
21 of you as well.

22 Typically, this is someone in

1 agriculture in their 20's, and I take a breath
2 and I take them aside and I remind them that the
3 traditional knowledge of health and ecology are
4 what organic is all about, and the new science of
5 the soil biome and the human biome have finally
6 caught up to our traditional understanding, and
7 that human health and global health and climate
8 change, nutrient density and all of these are
9 tied up in the ethic of organic, and it's
10 anything but meaningless.

11 So here's the problem. If we're
12 facing all of these complex chronic diseases
13 especially in that generation, and we know now
14 that all of our organic practices are the cure
15 for complex chronic disease, we have a whole,
16 people from all walks of life, all over the world
17 coming back to ecologically responsible
18 practices.

19 There are two million food retailers
20 in the U.S. Fewer than a thousand are certified
21 organic processors, handlers one-tenth of one
22 percent. The 99.9 percent are taking beautiful

1 organic produce and products, transporting them
2 in contaminated trucks, putting them in
3 contaminated totes, storing them in contaminated
4 coolers, washing them in contaminated water and
5 exposing them in particular to egregious toxic
6 chemicals under conventional pest control
7 regimens.

8 So we're not really delivering on the
9 organic promise. So maybe those 20-somethings
10 are right. We have one tool in the tool box that
11 is in OFPA Jenny, and it could really help the
12 situation, and that's the logo on the screen. It
13 is illegal for exempt or excluded operations to
14 use the USDA organic seal, and yet 99.9 percent
15 of retailers in the United States are able to and
16 often use that seal and represent themselves as
17 certified organic operation.

18 We need to use that tool so that
19 consumers who are looking for certified organic,
20 clean, helpful, healthy organic products know
21 where they can find it.

22 There's many retailers in the room

1 this time around, including the co-op grocers,
2 all of them spent hundreds of thousands of
3 dollars getting certified, having an organic
4 system plan, getting audited, correcting non-
5 compliances and working with organic pest
6 control. It's incredibly important to consumers,
7 and that's ultimately what's going to make
8 organic meaningful again and forever. Thank you.

9 MR. CHAPMAN: Thank you. Thank you
10 Alan, timing was great. Questions for Alan.
11 Emily?

12 MS. OAKLEY: Is it appropriate to ask
13 you for a specific example of an inappropriate
14 use of the USDA seal in a retailer situation?

15 MR. ALAN LEWIS: So I've sent a number
16 of examples to NOP enforcement. One is Aldi in
17 Kansas City, in fact all of their remodeled
18 stores. It's public knowledge. They're using a
19 teal and mauve stylized version of the seal,
20 which is against the law as a motif in their
21 produce department.

22 They have no organic system plan, no

1 organic controls, and yet that logo is everywhere
2 for consumers to see. Related to that is bulk
3 products at almost every non-certified retail.
4 Those are transported without a system plan.
5 They're all unaudited. They're opened and
6 relabeled by a non-certified operation, and the
7 green, white and brown logo is on the bulk bin.

8 Now I like promoting organic and I
9 like to see the seal, but we have a disconnect
10 and there's a tool to connect this. Make the
11 retailers and the distributors in the supply
12 chain comply with a verified organic system plan,
13 because the health effects of organic I don't
14 think are coming through, particularly because of
15 the pest control materials that are being put
16 outside the store, in the store and throughout
17 the supply chain.

18 MR. CHAPMAN: Thank you, and Alan has
19 submitted written comments with photos of those
20 examples, so you can go find that one. I had Dan
21 and Steve. Dan, then Steve.

22 DR. SEITZ: So Alan, just to

1 understand, so you're -- if I understand you
2 correctly, you're saying that food may be kept in
3 an organic state all the way until it gets to a
4 retailer, and when it reaches the retailer, if
5 they're not certified, apart from the advertising
6 abuses that you've observed, that just the normal
7 store practices may compromise the organic
8 quality. Is that sort of the core of what you're
9 saying?

10 MR. ALAN LEWIS: That's correct, Dan.
11 There's only one, for instance, national pest
12 control company that can do a proper organic pest
13 control program. The other two or three big ones
14 that are left are consolidation have no
15 capability to do this, and they're the ones
16 deployed throughout the food system and
17 particularly in retail.

18 MR. CHAPMAN: Steve.

19 MR. ELA: So you touched on bulk
20 displays, repackaging and such. I mean certainly
21 we know there's a lot of stores that have both
22 conventional and organic produce displayed,

1 commingled. Can you go a little further on that?

2 MR. ALAN LEWIS: Well it was another
3 -- that is correct. You've seen pictures,
4 locations. You cite song and verse of the OFPA
5 so that the enforcement folks don't have any
6 extra leg work to do. They can answer the
7 questions. I sent pictures of a Whole Foods in
8 Boulder displaying unstickered bell peppers
9 conventional on one shelf, unstickered organic
10 bell peppers right underneath it, and I raised
11 the question whether this was a compliant organic
12 system plan to prevent commingling.

13 Both the certifier and the NOP pretty
14 much said don't worry your pretty little head,
15 that's fine. Gravity and customers and moving
16 stuff around doesn't make sense. I think there
17 should be an organic section and conventional
18 section, and certainly not conventional over
19 organic.

20 So it's an example of something where
21 the certifier is defending a practice that would
22 be one phone call to say tell your guy not to do

1 it that way.

2 MR. CHAPMAN: Harriet, briefly.

3 MS. BEHAR: Are you aware that the
4 Organic Trade Association, oh geez it's been at
5 least 15 years ago, put out a book called "Good
6 Organic Retailing Practices" to try to help
7 retailers do a better job, especially those that
8 are not certified, to understand the practices
9 they need, like don't put the organic underneath
10 dripping non-organic produce from above. Have
11 you seen that or heard about that?

12 MR. ALAN LEWIS: I haven't seen that
13 particular document. NOP has one for retailer
14 compliance, general retail compliance. If you
15 drop an apple on the floor, don't call the
16 police. Wash it off, put it back on the display,
17 things like that.

18 Some retailers are better, not all are
19 bad. I think my example at Aldi's kind of an
20 egregious use of the seal, because I once
21 submitted a seal with the wrong color brown on
22 it, and Sam Welsch kicked that out, non-

1 compliance, right? So mauve and pink I think
2 would have thrown him into conniption.

3 Kroger's, pretty good, and you know
4 I'm the organic police. That's what I do on
5 vacations, go into grocery stores. So I think
6 some are more committed than others. But still
7 you see this logo, and what I want the singular
8 message here is consumers need to see the logo
9 and think certified supply chain.

10 Right now they're seeing the logo and
11 assuming that all that bulk, and all the apples
12 and oranges and everything are properly accounted
13 for and protected, and it would be a really
14 important tool for the federal government to
15 start using to enforce.

16 MR. CHAPMAN: Thank you, Alan.

17 MR. ALAN LEWIS: Thank you.

18 MR. CHAPMAN: And retailer beware if
19 Alan's coming to vacation in your town. Up next
20 is Jay, followed by Albert Straus. Jay, give us
21 your name --

22 MR. FELDMAN: Good afternoon. My

1 name's Jay Feldman. I'm Executive Director of
2 Beyond Pesticides and a former NOSB member from
3 2010 to 2015. Thank you all for your service.
4 Thank you NOSB members and NOP staff. So
5 continuing in Alan's, in the spirit of Alan Lewis
6 and continuous improvement, we'd like to raise
7 some serious process issues with you all today.

8 We may not always agree on decisions
9 that are made by the Board, but we must and
10 should agree on the process, the decision-making
11 process. We need a rigorous transparent process
12 of review of national materials, on National List
13 materials, that builds and protects the organic
14 brand.

15 That process must do two things. It
16 must show the public that critical scientific and
17 essentiality issues are considered, and it must
18 incentivize the market to make available non-
19 toxic products compatible with protection of
20 public health and the environment.

21 So we need to create a record, and the
22 important elements of that record are rigorous,

1 robust and reported review, documentation of all
2 positions of all stakeholders, transparency
3 through the release of detailed notes.

4 The public needs to see that the Board
5 considered all issues related to cradle to grave
6 adverse effects, compatibility with organic
7 practices, including biodiversity, ecosystem,
8 protection of the ecosystem including soil
9 management and essentiality.

10 The Board should reinstitute the
11 practice of documenting minority positions. One
12 of the many examples on the agenda of this
13 meeting is sodium carbonate peroxyhydrate, which
14 is noted to be highly toxic to bees. The CS
15 voted two to delist five to relist without any
16 explanation of the discussion and consideration
17 of the criteria for listing.

18 Work plan. The public discussion of
19 the work plan that we heard earlier today is a
20 positive sign. Until we fix the work plan
21 setting process, we suggest that the Board
22 announce at every board meeting work plan

1 requests that have been rejected by NOP, and NOP
2 has the opportunity to provide its reasoning.

3 In addition, when a proposed work plan
4 item is rejected or removed, put the issue into
5 the Subcommittee notes. Then the public could
6 weigh in when the notes are docketed and
7 according to Board policy by the way, passed by
8 this Board.

9 Inerts. At this point, we are out of
10 compliance with the law, and put listed materials
11 in legal jeopardy. Then there are thematic
12 concerns. We need a fermentation policy. The
13 issue of gellan gum came up. A true example of
14 the breakdown in the process. CBI is not
15 disclosed as a part of the original petition or
16 in the sunset process, and as a result the non-
17 disclosure of sources and detailed description of
18 manufacturing procedures cannot be evaluated.

19 Unless a manufacturer has sourced
20 organic or non-GE corn for its glucose syrup used
21 in the fermentation process, it should be
22 considered made with excluded methods. Now this

1 is true for other fermentation mediums, xanthan
2 gum, et cetera. We need a sanitation policy.
3 The Board should not be approving chlorine
4 materials at this meeting until such a policy is
5 in place. Thank you.

6 MR. CHAPMAN: Thank you, Jay. Emily.

7 MS. OAKLEY: Yeah. I appreciate your
8 comments about listing the minority view, because
9 it is definitely something that I thought of as
10 we made those deliberations, and then realized
11 that that's not tracked through the documents.
12 So then stakeholders don't necessarily understand
13 how it is that some people came to the decision
14 to vote the way that they did, when it isn't a
15 unanimous vote.

16 So you've suggested that we put the
17 minority view back in as I understand it, when
18 the PPM is slightly different than what you're
19 suggesting. So how is it that you would suggest
20 a road map for discussing or addressing after the
21 fact votes, representing divergent views or
22 voting positions?

1 MR. FELDMAN: Well, we have to
2 remember that this Board has the statutory
3 responsibility to advise the Secretary. So we
4 need a little more pushback, folks, in terms of
5 the policy and procedures.

6 One critical element in representing
7 the stakeholders, and I don't -- it doesn't
8 matter which side you're on on a particular
9 issue, is that that voice is heard through these
10 documents.

11 And that process is -- can only be
12 expressed through the minority view, or at least
13 -- I mean I would consider that the views of the
14 Subcommittee, because they're being expressed and
15 discussed. So yeah, I mean what -- you hit the
16 nail on the head in pointing to the PPM, because
17 that obviously establishes the process of review
18 in the outline.

19 The thing that's important to remember
20 here is that the process that we use for
21 approving a petition is the same process we
22 should be using in the sunset process. If you

1 look at this meeting at the documents for
2 petition review, they're much more thorough.
3 There's much -- they're much more robust.

4 We need that same documentation, that
5 same attention to new science, new information on
6 essentiality, and I would argue, as was the case
7 when I served on the Board, checklists for the
8 sunset process so that the public can look at
9 this.

10 Even if they don't agree with the
11 solution, well they can say well that was well-
12 reasoned. There's science here. I trust the
13 Board is doing its due diligence. So it does go
14 back to the PPM.

15 MR. CHAPMAN: I mean I'm looking at
16 the PPM. We have a section for a minority view.
17 There's also no section I'm aware of that
18 prohibits the accurate summation of the
19 discussions of the Subcommittee. If anything, if
20 it's missing from individual proposals that was
21 missed by those individual members of those
22 subcommittees. But is there some prohibition

1 that I am missing that you're referring to?

2 MR. FELDMAN: Well, it's not a
3 question of a prohibition. It's a question of an
4 affirmative policy requiring that the stakeholder
5 voices are heard through those documents, and I
6 didn't see -- I could be wrong. I didn't see any
7 attention to minority views throughout the
8 proposals or documents that was provided to the
9 public.

10 I'm not just saying that, you know,
11 two people disagreed with the majority. I mean
12 I'm talking about a documented, cited
13 justification for positions that are voiced by
14 both sides, including the minority side.

15 So the answer to your question I think
16 Tom is that yes, we'd like to see an affirmative
17 requirement that the documents that are presented
18 to the public cover the waterfront, as it were,
19 of those issues and positions.

20 MR. CHAPMAN: Emily.

21 MS. OAKLEY: I completely agree with
22 you in theory, and I'm sitting here trying to

1 think about how practicality would be applied in
2 this, because you know many times some of those
3 decisions aren't made until the vote is made, and
4 that discussion takes place during the course of
5 the meeting.

6 But we're voting on a document as it's
7 written. So that would lengthen the process,
8 because we would have to then take that document
9 back, craft a minority description for why people
10 abstained or voted no, then bring it back again
11 potentially to vote on that finalized version of
12 the proposal or whatever it may be, sunset
13 review, that we're then sending back for a final
14 approval by the NOP.

15 But it is -- I just want to say it's
16 something I will give a lot more thought to. I
17 think we can discuss it as a group. I think
18 practically it might be a little challenging, but
19 we should try to explore it.

20 MR. FELDMAN: Thank you.

21 MR. CHAPMAN: Thank you.

22 MR. FELDMAN: Thanks.

1 MR. CHAPMAN: Up next, we have Albert
2 followed by Dale Woods. Albert, can you start
3 with your name and affiliation?

4 MR. STRAUS: Affiliation, okay. My
5 name's Albert Straus. I'm founder and CEO of
6 Straus Family Creamery and have an organic dairy
7 farm. We were the first certified organic dairy
8 and creamery west of the Mississippi River, and
9 my company's built on relationships with our
10 farmers, with our customers.

11 Organic integrity and creating a model
12 that's actually showing the world that farms,
13 livestock farms, dairy farms are a primary
14 solution to climate change. So but what we need,
15 and I appreciate you guys, your work, your
16 efforts and Scott's beard.

17 But the tools that I'm trying to --
18 certifiers, when they're looking at dairies, need
19 tools to be able to benchmark or to really come
20 up with a baseline for farms. I presented a tool
21 before. It was a pasture stocking rate tool.
22 I've now found a -- it's actually an app for a

1 hunting app, which actually gives you parcels,
2 the name of the parcel, the acreage of the
3 parcel.

4 And then in collaboration with this
5 pasture stocking rate, we can see that -- there's
6 one instance I have is a 1,200 cow dairy that's
7 on 312 acres, that my calculation says that they
8 should only be able to milk 624 cows. So it's a
9 baseline to have certifiers and inspectors look
10 at, and then to kind of say if there's some
11 difference, show us where the proof is.

12 The second part of what I wanted to
13 talk to you guys about is we've been -- we were
14 the first dairy to have a carbon farm plan to
15 sequester 2,000 metric tons per year. Twenty
16 percent of that is from adding compost and using
17 animals to graze and planting hedge rows and wind
18 breaks.

19 We've been working with a NASA
20 scientist to quantify the amount of growth of
21 biomass or pastures and crops using satellite
22 imagery, and to -- it's to really build the case

1 for -- the economic case for farmers to do these
2 practices. So this is a graph of the nine
3 dairies that supply our creamery, and when they
4 went organic and then proved over the last 18
5 years, the improvement of biomass production.

6 And then what we also are showing is
7 that there's probably about 100 acres, excuse me,
8 \$100 per acre per year savings by growing more to
9 feed on farm versus having to buy off-farm feed.
10 So we're really trying to make something that can
11 be expandable, really make a difference, and show
12 that farms are really a viable entity. Thank
13 you.

14 MR. CHAPMAN: Any questions for
15 Albert? Harriet.

16 MS. BEHAR: Did you bring any ice
17 cream?

18 MR. STRAUS: We're in the wrong part
19 of the country.

20 (Laughter.)

21 MR. CHAPMAN: So maybe -- maybe the
22 Seattle meeting then?

1 MR. STRAUS: There's one thing about
2 the economic, the economic impact of having
3 dairies convert or do continuous conversion. If
4 there's a ten percent surplus of organic milk and
5 these farms are producing more and more milk,
6 you're depressing the price for everybody in the
7 industry.

8 So the dairy farmers are suffering all
9 over the country. The excess production is the
10 driving force behind it. So I want to add that
11 to kind of just the logic behind it, okay? Thank
12 you.

13 MR. CHAPMAN: Lisa.

14 MS. DE LIMA: Hi, I have a question
15 about something you put in your written comment
16 about the gums on 606. You had mentioned that
17 you were in support of delisting the gums,
18 because there were organic versions available,
19 and I was wondering if you use any of those gums
20 and are able to source organic? So these are --
21 would be gum arabic, carob and guar?

22 MR. CHAPMAN: Can I add to that? If

1 you could also talk about the quantity that you
2 source, and whether or not you've had any issues
3 in the past?

4 MR. STRAUS: The only thing we have to
5 use gums are for -- are soft serve, because we
6 don't add gums to any of our products unless we
7 absolutely have to. The only one we have to use
8 some gums are for -- it's a very small amount, I
9 think less -- like .2 percent of the mix, in our
10 soft serve mix, and it's -- I'm pretty sure we
11 have an organic source.

12 We don't use these other carrageenan
13 with the concern about carcinogens. We don't use
14 a lot of these different ones. There is a little
15 bit of -- now that I'm thinking about it, there
16 is a little bit of gum in I think the chocolate
17 chips that we buy. But other than that, I still
18 think that using organic sources is -- they're
19 available.

20 We just need to kind of stop allowing
21 the excuses of innovation is driven by necessity.
22 You have to have organic sources. I'm sure they

1 can find a way to do it.

2 MR. CHAPMAN: Do you know how long
3 you've been using organic sources of gums?

4 MR. STRAUS: It's been a few years.

5 MR. CHAPMAN: More than five?

6 MR. STRAUS: They haven't had soft
7 serve out that long so somewhere in the three to
8 five year.

9 MR. CHAPMAN: Okay. Thank you for
10 providing that detail. It's appreciated. Thank
11 you.

12 MR. STRAUS: Thank you.

13 MR. CHAPMAN: Up next is Dale,
14 followed by Dave Colson.

15 MR. WOODS: I appreciate the post five
16 o'clock crowd still here. It's really nice. I'm
17 Dale Woods. I'm with the California Department
18 of Food and Agriculture. I'm the program manager
19 for the fertilizer program, which has both the
20 conventional and an organic input portion to the
21 program.

22 We are both -- as the organic portion

1 of the program, we operate both as an MRO, a
2 material review organization, but we also have a
3 regulatory function for both organics and all
4 other fertilizer issues. I want to talk about a
5 couple of things this time.

6 At the last meeting, I talked about --
7 I brought up the issue of the liquid fish and how
8 to consider the pH 3.5 limitation, and the
9 comparison of either using a drift method or an
10 absolutely low floor for it, and I'm still kind
11 of waiting for a response from NOP for how --
12 some suggestions about how the CDFA and OMRI can
13 kind of come to an agreement about that.

14 Also on the liquid fish, for some time
15 the NOSB has been asking a lot, the fertilizer
16 producers who came questions about their
17 environmental concerns about the fish they were
18 sourcing.

19 I'm actually very glad that this is
20 now being moved to more of a work agenda thing,
21 because it was kind of clear to me that the
22 number of people you had coming here and

1 providing information was an extremely limited
2 type group of people, and I don't think you were
3 getting a clear picture of what is actually being
4 sourced in the world of fish.

5 It's a real mess between animal feeds
6 and fertilizers. They're deeply intertwined, and
7 it would not have been served well to have dealt
8 with it with just some comment during this time
9 frame.

10 Quick question, quick comment on kelp.
11 There was a question about how much kelp is being
12 used in conventional and organic. We register
13 about 10,000 fertilizing labels, and I would tell
14 you right now that the vast majority of the
15 labels that have kelp in them are in the organic,
16 in the organic system.

17 That does not mean that the vast
18 majority of kelp is being used in the organic
19 system. The conventional people who do use it
20 use it in a much larger acreage, you know,
21 because we're talking about big conventional
22 grape growers or something like that.

1 So there's a significant amount of
2 kelp that is used in those products, and I could
3 not in any way give you any figures about what
4 that is because they're not necessarily required
5 to give us specific use numbers. Within the
6 organic portion, those labels that we do
7 register, there's big commercial ag people.
8 There's home and garden, tons of home and garden
9 people.

10 There's a lot of specialty products,
11 which is where the largest number of labels that
12 we have, they have kelp in them, are those
13 specialty products which are used for the
14 specialty cannabis market. So that is -- that's
15 one of the largest number of labels we have. I
16 have no idea about anything else, okay.

17 I will mention real quickly paper
18 pots. CDFA has not dealt with paper pots because
19 no one has asked us. But if it is continued to
20 be talked about as a real fertilizing material,
21 anyone in California who wants to use it will
22 have to register those paper pots with us.

1 Any time it's mentioned as a benefit
2 to soils, it becomes then under our purview and
3 they're going to have to register that product.

4 MR. CHAPMAN: Thank you, Dave. I've
5 got a question, then we'll do Steve and I think
6 Emily's got a question. Related to the
7 questions, the liquid fish questions that we had
8 been asking, and the sustainability of fish,
9 there's been questions around, and I don't know
10 to what extent you can disclose an aggregate data
11 or not. Do you have a sense of the market origin
12 of the fish? Is it a byproduct? Is it a product
13 that's wild caught specifically for the
14 fertilizer products? Is there other origins?

15 MR. WOODS: U.S. and Mexican producers
16 are basically doing stuff that's split between --
17 I mean their primary market is the pet food
18 market, I mean and then human fish oil stuff. So
19 the fertilizer is purely an afterthought. But if
20 the fertilizer people aren't going to take it, it
21 gets tossed. It's purely a waste product.

22 That is maybe a little bit less true

1 internationally, but it is still a part of the
2 issue. All these guys are sourcing stuff. Most
3 of it is as an afterthought for the other
4 markets. But some of it is truly wild caught,
5 and some of it is -- some of the stuff is
6 actually cultivated.

7 MR. CHAPMAN: Okay. Steve, then
8 Emily.

9 MR. ELA: So two questions on the
10 fish. How would -- I mean it's now on our work
11 agenda. How would you suggest we craft a TR
12 request or word to get a better answer on this,
13 exactly what you were just saying? Do you have
14 any thoughts?

15 MR. WOODS: Yeah, I don't know.
16 That's my concern, is it's a -- they're not
17 necessarily interested in getting a lot of
18 information to the fertilizer world because it's
19 a blip on their economic thing. I mean sure,
20 they'll sell it to the fertilizer people, but if
21 the fertilizer people --

22 If a registrant asks them too many

1 questions, they say go away, we're not going to
2 sell it to you. You're not worth my time. So
3 it's going to be hard. It's going to be really
4 hard.

5 MR. ELA: And then your last comment.
6 So on the paper pots, if it's used as a mulch, is
7 that -- do you call that a fertilizer?

8 MR. WOODS: You see the reason -- the
9 reason we did not have to deal with it is that we
10 viewed this as a certifier question, because as
11 long as it's a pot, it's basically a planting
12 issue. They're using a pot, they're planting it.
13 That's in the certifier realm. That's not in an
14 MRO. That's not in our MRO stuff.

15 However, because it's not really a
16 fertilizing input as long as there's no claims
17 made for it. But as soon as claims are made that
18 this is a benefit to the soil, that is that it
19 provides soil-amending qualities, now you're by
20 state law drawn into our fertilizer realm, and
21 then those products must be registered with the
22 Department in order to be sold in California.

1 MR. ELA: So if they just don't say
2 anything, they just apply a mulch.

3 MR. WOODS: Well here's -- here's the
4 problem, is that this meeting has done that. You
5 know, the manufacturer could sit there and just
6 say hey, here's a pot, you know, and we'd never
7 pay any attention to it at all. But now in the
8 world of organics, everyone is saying okay,
9 here's these paper pots.

10 They've been used for this purpose,
11 and by the way they have soil-amending
12 functionality. So now it's been drawn into our
13 world, whether we wanted it or not.

14 MR. CHAPMAN: Dale, can you briefly
15 describe the scope of authority of the CDFA
16 material review, since it's different than OMRI
17 or other material review organizations?

18 MR. WOODS: The original, the origin
19 of our stuff is basically to deal with review for
20 fertilizing products to be used in California.
21 That is our original mandate. However, our list
22 is available to anyone. Certain certifiers

1 throughout the U.S. and wherever use our, use our
2 list.

3 We have suppliers, we have people
4 coming from all over the world that are
5 registering products with us. We have a little
6 over 2,000 organic OEM products that we have
7 listed. If you wish to distribute a product as
8 an organic input material for growing in
9 California, it must by law be registered in
10 California. If it's not, it's subject to
11 quarantine and/or civil penalties.

12 MR. CHAPMAN: But your program doesn't
13 go to the extent to review pesticides per se --

14 MR. WOODS: We do not. There's a
15 large number of things we don't deal with. We
16 don't deal with anything associated with animal,
17 livestock issue, nothing with processing and
18 handling, nothing with pesticide. It's purely
19 this one little piece.

20 MR. CHAPMAN: Yeah, thank you. Emily?

21 MS. OAKLEY: Thanks for your comments
22 on liquid fish. When we requested that for the

1 work agenda, we actually focused on wild caught
2 fish harvested whole exclusively for the use as
3 fertilizer. But I'm hearing in your comments
4 concern about byproduct fertilizers, that might
5 be the byproduct of the pet food industry or
6 human oil consumption; is that correct?

7 MR. WOODS: Sure. Almost, I'd say the
8 larger fish people are out there -- out
9 collecting fish knowing, you know, probably the
10 larger ones are out there collecting fish,
11 knowing they're bringing it in for the pet food
12 market and the leftovers go to the fertilizer
13 world.

14 So that is wild caught fish focused
15 directly on fertilizer. Not their primary goal,
16 but that is a piece of what they're out there
17 for.

18 MS. OAKLEY: You're saying it provides
19 part of the economic benefit of that product?

20 MR. WOODS: Yes, yes.

21 MS. OAKLEY: So we should potentially
22 expand the scope of the review?

1 MR. WOODS: Well, I just think it
2 complicates it. I don't really know where you're
3 going to go with it.

4 MS. OAKLEY: Okay, thank you.

5 MR. WOODS: Thank you.

6 MR. CHAPMAN: Thank you, Dan. Up
7 next is Dave Colson, followed by, I apologize if
8 I butcher this name, but I think Bjarne Pedersen.
9 Dave, if you start with your name and
10 affiliation.

11 MR. COLSON: Good afternoon. My name
12 is Dave Colson. I'm a proud certified organic
13 farmer from Durham, Maine, and I'm also the
14 Organic Agricultural Services Director for the
15 Maine Organic Farmers and Gardeners Association.
16 I'd like to focus my comments on the marine
17 materials discussion.

18 My comments are in addition to those
19 submitted by MOFGA Certification Services.
20 Regarding the feasibility of requiring all
21 seaweed harvested for use in organic crop
22 production to be certified to the wild crop

1 standards, MOFGA believes this would be difficult
2 to accomplish in practice.

3 MOFGA Certification Services currently
4 certifies sea vegetables for human and animal
5 food using different aspects of the national
6 rule. The impetus for developing the standards
7 was due to the change in the particular seaweed
8 product kelp from the classification of a feed
9 supplement to a feed additive.

10 Many farmers around Maine and around
11 the country told us of the need for this product
12 in the feed rations and their wanting to continue
13 to allow the use of kelp. A certified process
14 needed to be developed.

15 The sea vegetable standard was put
16 together not with a comprehensive look at the
17 ocean ecosystem, the intrinsic value of seaweed
18 contributions of the marine environment, or how
19 harvest of these crops might affect the
20 environment, but in a somewhat convoluted process
21 of utilizing the existing land-based standard and
22 applying it to a seed-based crop.

1 While not perfect, this standard did
2 allow for the continued use of kelp in livestock
3 feed and for the certification of kelp for the
4 human consumer market. Now we are facing
5 questions of sustainability and the value of a
6 number of seaweeds in the marine ecosystem, and
7 not just as a product for human and animal
8 consumption.

9 History has shown us they were not
10 always good stewards of the ocean, its flora and
11 fauna. Settlers came to Maine and the maritime
12 provinces for the abundant resources of seafood,
13 sturgeon, cod, haddock, herring and more. One by
14 one we've seen these resources depleted. Shrimp
15 has not been harvested from the Gulf of Maine for
16 three years now.

17 A new market for sea urchins booming
18 just a few years ago has dried up. Lobsters, one
19 of the bright spots in Maine fisheries, but their
20 abundance can be traced in part to the decline of
21 their predators. Now we are in the process of
22 taking the very foundation of the marine

1 ecosystem, seaweed, and exploiting for commercial
2 use.

3 I realize that the portion of seaweed
4 harvested and used by the organic community is
5 small in comparison to the amount of total kelp
6 or ascophyllum harvested in Atlantic waters. But
7 we as an organic community have an opportunity to
8 step back, look at the larger context of the
9 oceans and their resources, and make a choice
10 that can send a message to the wider community
11 about safeguarding our natural resources. Isn't
12 this what organic farming was all about in the
13 beginning? That was fast.

14 I appreciate the chance to make
15 comments, and thank you for your work.

16 MR. CHAPMAN: Thank you, Dave. Any
17 questions for Dave? Emily.

18 MS. OAKLEY: Thank you for your
19 comments. I know both in MOFGA's comments and in
20 the comments of one of the producers that MOFGA
21 certifies, there is concern that if this
22 requirement for wild caught standard

1 certification for the ingredient, in this case
2 rockweed for a crop input were mandated, that it
3 would push producers into pristine areas.

4 But when I read that I was thinking
5 well, wouldn't that then be excluded because it
6 would be not adhering to the environmental impact
7 portion, not destructive to the environment in
8 the wild crop standard? I was wondering if you
9 had any thoughts on that.

10 I would also just want to note that
11 some of this rockweed in Maine is harvested for
12 livestock feed, and the exact same operators and
13 the same boats and the same materials then go out
14 and harvest rockweed in a different area for crop
15 input. So I think that's where that concern was
16 coming from, that they would be moving into more
17 pristine areas for the crop input. Thoughts on
18 that?

19 MR. COLSON: Yes. So one of the
20 interesting things about thinking about pristine
21 areas, and in some ways these are conserved areas
22 but Robin Hadlock Seeley talked a little bit

1 about this earlier, in the establishment of the
2 sea vegetable harvesting guidelines, we had to
3 apply a number of buffers, and this was included,
4 I believe in the certification, MOFGA
5 certification services comments.

6 So things like 20 miles from a nuclear
7 facility, three miles from a commercial boat-
8 building facility, three miles from an industrial
9 waste discharge area, three miles from any city
10 or town sewage discharge, three miles from a
11 harbor or thoroughfare and there's, you know,
12 more in addition to that.

13 So a pristine area would be one that
14 would be considered to be not near any of those
15 things. So harvesting from that area in a sense
16 would be the default place for harvesters to go,
17 since it would be easy for them to pinpoint where
18 that area was and that they were harvesting those
19 certified organic seaweeds from those areas.

20 MR. CHAPMAN: Any other questions?

21 Thank you.

22 MR. COLSON: Thank you.

1 MR. CHAPMAN: Up next is Bjarne,
2 followed by Doug Currier. If you could start
3 with your name correct if I messed up and
4 affiliation.

5 MR. PEDERSEN: Thank you, I think
6 you're doing fine. My name is Bjarne Pedersen,
7 and I'm from Denmark. I'm affiliated with and
8 represent a Danish company, Ellepot. Ellepot
9 manufactures a paper pot system. I'm very
10 thankful for the opportunity to be here to
11 present this comment on paper pots.

12 We support the petition for paper pots
13 and we commend it to be part of a more general
14 use of paper as a generic material for a crop
15 production aid. I believe we may have a solution
16 here. I have assisted Ellepot in developing
17 papers for seven years now, including material
18 for input to organics.

19 Today, we have a virgin paper approved
20 by Soil Association in the United Kingdom.
21 Without the use of these petroleum-based
22 additives mentioned in the petition. We have

1 applied for the same at WSDA but were rejected,
2 as we cannot use newspaper or recycled for
3 Ellepot.

4 We spent two to three years working
5 with the UK certifier to identify the materials
6 that they will allow us to use, and after their
7 approval we now have annual audits with
8 inspection of our production.

9 The UK certification is under the EU
10 and as I understand, due to the trade agreements
11 with the U.S., a grower over here could now
12 actually import young plants for organic crops
13 with this paper.

14 I think it would be better to have the
15 paper certified over here, to allow the grower to
16 produce the Ellepot at his own facility. Making
17 an Ellepot, we use a special additive. It's from
18 a material that was actually suggested to us by
19 the Soil Association. It was already approved as
20 an input material as a soil conditioner.

21 The important feature of this material
22 is the home composting certification by TUV

1 Austria, formerly Von Schott (phonetic). It is
2 my understanding that the material for this
3 should be either home compostable or
4 biodegradable in soil to be accepted. This is
5 something that I would recommend for the Board to
6 look into as a claim for the adhesives.

7 Ellepot has a range of other papers
8 using the same petroleum-based additives as
9 mentioned in the petition, and again I would like
10 to say that the Ellepot have these two new
11 products now approved in the UK. One is for
12 paper pots; the other is a weed barrier. Both
13 are developed directly for the organic crops, and
14 they were fully plant-based papers. They don't
15 contain any petroleum-based components at all.

16 I wish to leave you with this comment,
17 to let you know that we do, we can do these
18 papers without the binders that are mentioned in
19 the petition. Thank you.

20 MR. CHAPMAN: Harriet, and then Steve.

21 MS. BEHAR: So I'm looking at your
22 website. Hello. Do you do any of your pots in a

1 chain type system, or are they all individual?

2 MR. PEDERSEN: They are all individual
3 pots. We manufacture the machinery and sell or
4 lease the machinery to the grower, and then
5 afterwards we sell the paper to the grower and
6 they can produce any number of paper pots that
7 they wish to use. They're not in a chain.
8 They're individual pots.

9 MS. BEHAR: And are they available
10 here in the United States? Do you have
11 distributors here?

12 MR. PEDERSEN: We have distributors
13 here, yes. We have many customers in the U.S.
14 today as it is, conventional growers. We've had
15 questions from organic certified growers for I
16 think six or seven years now for papers to be
17 used, and well we've been working on developing a
18 special paper for that segment, because we're
19 very careful on what we have them leave in the
20 soil afterwards, as the paper is intended to stay
21 in the soil.

22 MR. CHAPMAN: Steve.

1 MR. ELA: So just to be clear, so no
2 adhesives. You said there's the one material
3 that I assume you can't say what it is exactly,
4 but it's approved by the Soil Association. You
5 think you could -- I mean obviously one of the
6 benefits of like the paper pots that we've been
7 talking about is the chain, so they can quickly
8 transplant.

9 Could you develop a product like that,
10 or is that without the adhesives? Is that
11 difficult?

12 MR. PEDERSEN: I don't -- I think we
13 might be able to develop it, but for the Ellepot
14 system, we're looking in a different direction,
15 as the transplanting machines for the Ellepot are
16 taking them from trays and putting them into the
17 soil, which our machines work quite well today.

18 The chain is based on materials that
19 I think is probably the main challenge, because
20 it's been very difficult for us also to make the
21 paper that we have today.

22 But what we've been looking into is

1 generally bio-based materials that are home
2 compostable, because you can get bio-based
3 materials that are very, very long lifetime in
4 soil, and we don't want to use that at all. So
5 the strength of material is very difficult to
6 obtain.

7 MR. CHAPMAN: Dave.

8 MR. MORTENSEN: I was just curious.
9 Is your company primarily an implement
10 manufacturer or a paper product manufacturer or
11 both?

12 MR. PEDERSEN: It's a full system,
13 because we don't sell the paper without putting
14 the machine there first actually. So it's a full
15 system of the machine, the paper, the tray and
16 sometimes also the substrate. Usually the grower
17 have their own substrate mixes and then we build
18 this system around what the substrate they want
19 to use, so that it's kind of a flexible system
20 around that.

21 MR. MORTENSEN: Yeah. The farmers
22 here that we've heard from have been buying. I

1 don't know the planter, but it's a planter that's
2 adapted for the kind of paper product that
3 they're using now. That's my impression anyway,
4 but thank you.

5 MR. CHAPMAN: Thank you. Up last we
6 have Doug Currier. Doug, if you could start with
7 your name and affiliation.

8 MR. CURRIER: Thanks. My name is Doug
9 Currier. Hello to the Board members. I am the
10 Technical Director of the Organic Materials
11 Review Institute. I'm going to comment on the
12 marine materials discussion document and the
13 sodium citrate proposal.

14 So first OMRI supports the creation of
15 a working group which aims to address consistent
16 review standards for products certified using the
17 wild crop harvesting practice standard, NOP
18 guidances and NOP Policy 12-1. While OMRI does
19 not certify products, we recognize the need for
20 consistency in wild crop certification, not just
21 for marine materials but for crop, wild crop
22 products as well. OMRI is open to providing

1 assistance to that working group.

2 Currently, OMRI lists 94 products as
3 allowed in the category of aquatic plant products
4 synthetically extracted in the crop fertilizer
5 and soil amendments class. OMRI also currently
6 lists 28 products allowed in the category of
7 aquatic plant products not synthetic.

8 There are hundreds of products listed
9 in our generic fertilizers blended category, some
10 of which do formulate with aquatic plants. So
11 it's unclear whether a global supply chain of
12 certified organic aquatic plants would meet the
13 current demands of input manufacturers, in
14 addition to the current demand for a certified
15 organic marine materials used in livestock feed
16 rations, as well as materials listed at 205.606.

17 While the present discussion document
18 identifies the 2015 sunset review as the genesis
19 of concerns regarding the ecological harvesting
20 marine materials, I'm sure the Board is aware
21 that there are other non-waste stream materials
22 that are not associated with the National List

1 materials.

2 Therefore, another route is likely
3 required for those materials if the ecological
4 impacts of their use is considered in the future.

5 Sodium citrate. While OMRI does
6 delist blood meal products manufactured from
7 blood treated with sodium citrate, there are
8 blood meal products manufactured from blood
9 treated with other anti-coagulants, as well as
10 blood meal manufactured using untreated blood,
11 which are also listed.

12 OMRI's view is that incidental amounts
13 of residual anti-coagulant is allowed in blood
14 meal, given that mechanical processing steps
15 typical of blood meal manufacturing such as
16 centrifugation and heating will generally result
17 in their sufficient removal. Anti-foam is used
18 when handling but is viewed in the same way.

19 The issue of ancillary substances in
20 animal byproducts certainly does not stop with
21 blood meal. Meat and bone meal products are also
22 at risk of containing some amount of residual

1 processing aids, which are used in handling a
2 volume of byproduct materials.

3 In an effort to avoid the piecemeal
4 approval of synthetic processing aids, the NOSB
5 could respond to individual petitions with a
6 consistent message that NOP Guidance 5033 and
7 5033-1 are sufficient to assess input compliance,
8 and in these documents there is plain language
9 guidance on the review of materials extracted
10 from non-organic sources. Thank you.

11 MR. CHAPMAN: Emily?

12 MS. OAKLEY: Thank you for your
13 comments on marine materials. Some of the
14 concern that was expressed by stakeholders was
15 the difficulty for certifiers to verify the
16 organic status of that particular ingredient. So
17 I wanted to ask if you're aware at this point of
18 materials that OMRI does list that do contain
19 certified organic marine macroalgae?

20 Obviously that claim can't be stated
21 as a USDA organic seal product. But could you
22 discuss or address the feasibility for certifiers

1 to go back to a product and then verify if it
2 were required to be certified to the wild crop
3 standard, its certification for that ingredient?

4 MR. CURRIER: So we're talking about
5 crop products here, and so OMRI looks at crop
6 products differently than products considered for
7 livestock consumption and human consumption. So
8 we ask the question based on the definitions at
9 205-2 and 205.300, whether or not the product is
10 intended for livestock or human consumption. If
11 it is ingredients, agricultural ingredients
12 listed on the label would come under the use of
13 the term "organic."

14 And so crop products, specifically
15 crop fertilizers, you know, could include
16 certified organic on the label, and we would --
17 we would need to look and ensure that that's
18 true. But other types of uses of the term
19 "organic" are outside of our -- the scope of the
20 use of the term "organic." Hopefully that
21 answers that question.

22 MR. CHAPMAN: All right. I think

1 that's it. Thank you very much.

2 MR. CURRIER: Yeah.

3 MR. CHAPMAN: That concludes public
4 comment for today. It's what, 5:52, so just
5 before six o'clock. We start up tomorrow at 8:30
6 in the same location. Also starting with public
7 comment.

8 If the people are here, the first
9 public commenter tomorrow is Cori Skolaski,
10 followed by Marisol Oviedo. And just so folks
11 know to put it on their schedules, it looks like
12 Organic Valley is hosting a networking reception
13 featuring delicious organic cocktails, and that's
14 good, because the only food I eat is delicious,
15 and it's here in Ballrooms 2 and 3. So that's
16 Thursday from 6:30 to 9:00.

17 Right now we'll go into recess and
18 reconvene tomorrow at 8:30.

19 (Pause.)

20 MR. CHAPMAN: Just a note for folks
21 still in the room before you rush out, if we find
22 ourselves ahead of schedule tomorrow, we may move

1 into the Livestock section, which is right now on
2 the agenda on Friday. So just to repeat, if we
3 find ourselves ahead of the schedule tomorrow, we
4 might move into the Livestock section on Thursday
5 afternoon/evening.

6 (Whereupon, the above-entitled matter
7 went off the record at 5:54 p.m.)

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C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: National Organic Standards Board
Fall 2018 Meeting

Before: USDA

Date: 10-24-18

Place: St. Paul, MN

was duly recorded and accurately transcribed under
my direction; further, that said transcript is a
true and accurate record of the proceedings.



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UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ORGANIC STANDARDS BOARD

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FALL 2018 MEETING

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THURSDAY,
OCTOBER 25, 2018

The Board met in Great River Ballrooms 1&4 of the Intercontinental Saint Paul Riverfront Hotel, 11 Kellogg Boulevard East, St. Paul, Minnesota at 8:30 a.m., Tom Chapman, Chairman, presiding.

PRESENT

TOM CHAPMAN, Chair
HARRIET BEHAR, Vice Chair
SCOTT RICE, Secretary
SUE BAIRD
ASA BRADMAN
JESSE BUIE
LISA DE LIMA
STEVE ELA
RICK GREENWOOD
DAVE MORTENSEN
EMILY OAKLEY
A-DAE ROMERO-BRIONES

ERIC SCHWARTZ

DAN SEITZ

ASHLEY SWAFFAR

STAFF PRESENT:

MICHELLE ARSENAULT, NOSB Advisory Board

Specialist, National Organic Program

SONIA JIMENEZ, Deputy Administrator, Specialty

Crops Program, Agricultural Marketing

Service

DR. PAUL LEWIS, Ph.D., Director, Standards

Division, National Organic Program

CLARISSA MATHEWS, Ph.D., National List Manager

DEVON PATTILLO, Materials Specialist, National

Organic Program

DR. JENNIFER TUCKER, Ph.D., Deputy

Administrator, National Organic Program;

Designated Federal Official

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

2 8:30 a.m.

3 CHAIRMAN CHAPMAN: Welcome back
4 everybody. We'll get started now. Looking
5 around the room it looks like all the Board
6 members are present so we'll come back into
7 order.

8 First up today will be public comment.
9 Public comment will run through lunch. We'll
10 break for lunch sometime in the noontime hour and
11 then come back with the Materials Subcommittee;
12 the Compliance, Accreditation, & Certification
13 Subcommittee. If time allows, potentially the
14 Livestock Subcommittee.

15 Up first on public comment is Marisol
16 Ovieda followed by Michael Sligh.

17 Just as a quick reminder, it's three
18 minutes for public comment. Only one speaking
19 opportunity. The light will be green for the
20 first two minutes, yellow for the last minute,
21 and then turn red when the buzzer goes.

22 At that point we ask that the speakers

1 wrap up what they have to say. We'll open it up
2 at that point to the Board to ask questions of
3 the speaker. Then I will always call the speaker
4 and the one on deck.

5 With that, Marisol, start with your
6 name and affiliation for the record.

7 MS. OVIEDA: My name is Marisol Ovieda
8 and I'm with the Northwest Horticultural Council
9 out of Yakima, Washington. The Northwest
10 Horticultural Council represents growers,
11 packers, and shippers of apples, pears, and
12 cherries in Idaho, Oregon, and Washington on
13 federal and international policy and regulatory
14 issues.

15 While the NHC submitted written
16 comments on a number of materials for organic
17 tree fruit growers and handlers, I will focusing
18 my oral comments on the continued use of
19 elemental sulfur and sulfurous acid in the
20 National Organic Program.

21 In many ways the Pacific Northwest is
22 the epicenter of organic palm fruit and cherry

1 production in the United States. Washington
2 State is the national leader in the production of
3 organic apples, pears, and cherries. Over seven
4 million boxes of organic apples are now harvested
5 from over 14,000 acres.

6 This amounts to over 90 percent of the
7 entire organic apple crop in the United States.
8 There is also a significant amount of organic
9 pears and cherries with more than 4,000 acres
10 planted across the Pacific Northwest.

11 As recognized by the Crop Subcommittee
12 elemental sulfur is a critical tool for the tree
13 fruit industry and the orchard setting. It is a
14 vital insecticide used to control russet mites in
15 organic apples and pears and has been used by our
16 growers for over 100 years.

17 This product is also used to control
18 scab and brown rot in organic apples, pears, and
19 cherries. In particular, elemental sulfur is one
20 of the few options available to treat powdery
21 mildew.

22 It is an essential material that our

1 organic growers depend on. There are no
2 alternatives to the elemental sulfur that
3 provides the same level of control and are as
4 compatible with the materials used during the
5 growing season.

6 Elemental sulfur is also used to
7 adjust soil pH which ensures better nutrient
8 uptake, improve water penetration, and enhances
9 overall plant health. This, in turn, provides a
10 healthy soil environment for the beneficial
11 insects and microbial activity. It is a
12 necessary tool for organic production. It is
13 worth noting Pacific Northwest growers use the
14 wettable application of elemental sulfur.

15 Sulfur's acid is used as a plant and
16 soil amendment. It is generated on site by
17 burning 99 percent elemental sulfur in sulfur
18 burners which irrigation water then passes
19 through. This allows organic growers to take
20 water with a high pH of 8.3 or higher and reduce
21 it to a level of 6.5 pH.

22 This makes the water more conducive to

1 plant and soil health and improves water
2 absorption. Irrigation water with a high pH if
3 left untreated causing calcium carbonate on the
4 leaf and fruit surface. By lowering it, it
5 results in better nutrient uptake.

6 On behalf of the growers and packers
7 that we represent, the Northwest Horticulture
8 Council strongly supports the continued use of
9 these vital tools for insect control and plant
10 and soil health. We ask the members of the Board
11 to support the continued listing of these
12 products as they are critical to maintain the
13 production of organic tree fruit. Thank you.

14 CHAIRMAN CHAPMAN: Thank you.

15 Any questions? Steve.

16 MR. ELA: I've got a question on
17 natamycin for you guys. Do you see any need for
18 that in the Northwest tree fruits?

19 MS. OVIEDA: It's something that's
20 being vetted through our growers at the moment.
21 We didn't put in support for it at the moment.
22 We're trying to get more feedback on it but it's

1 something that is on the table for our growers.

2 CHAIRMAN CHAPMAN: Thank you.

3 Up next is Michael Sligh followed by
4 Tom Warmuth.

5 Michael, if you would start with your
6 name and affiliation.

7 MR. SLIGH: Good morning. I'm Michael
8 Sligh, senior adviser to RAFI and founding member
9 of this Board. I also rise in support today for
10 North Carolina organic tobacco farmers for the
11 repetition of fatty alcohol for tobacco
12 suckering.

13 Organic fraud. We strongly support
14 and applaud all actions now to close supply chain
15 loopholes, strengthen oversight, increase real-
16 time data access, and achieve consistent
17 interpretations of standards across all size
18 operations both domestically and internationally.

19 Legitimate organic operations and our
20 overall organic integrity is at stake. Focusing
21 more on high-risk locations and operations,
22 ports, satellite offices while developing greater

1 rewards for those who remain in compliance is
2 key. As well as greater coordination of such
3 initiatives that are emerging in the interim.

4 New genetics techniques as part of the
5 NOSB task force strongly urge not only adoption
6 of these new additional recommendations but that
7 this full work agenda be completed in time for a
8 final vote of approval by your next spring
9 meeting.

10 It is critical that this also be
11 accompanied by guidance and instruction out to
12 certifiers as soon as possible. This is a
13 critical issue that we must become more proactive
14 on to avoid harm to our supply chains.

15 OFPA. We urge all present to strong
16 oppose any attempts during this extended farm
17 bill cycle to weaken the OFPA and its delegate
18 balance of responsibilities and authorities that
19 have served our community so well for so long.
20 It is vital that we remain united and strong
21 against such attacks. Nothing less than the
22 heart of the law is at stake.

1 A call for fairness. As the original
2 Board we made strong recommendations to the USDA
3 to create a nationwide system for farmers,
4 certifiers, and county emergency management to
5 try to avoid toxic sprays on organic farms during
6 emergency crises and for USDA to develop a system
7 of compensation for such farms that lose their
8 crops through no fault of their own.

9 I think now is the time to look at
10 such a universal compensation plan that would
11 also address a growing number of additional such
12 harms as fracking, testing and GMO contamination,
13 and pesticide drift.

14 This is a fundamental issue of
15 fairness, one that we must stand firm on as a
16 principle. We have an obligation to protect
17 organic farmers. We urge you to put this topic
18 back on your work agenda.

19 Finally, North Carolina is home to
20 over half of the 300 plus organic tobacco farmers
21 and they are very concerned about the loss of
22 this essential material to remove suckers from

1 their tobacco plants. We urge NOSB to strongly
2 reconsider the allowance of this use while
3 prioritizing organic research, define long-term
4 organic solutions.

5 I know your sacrifice and I thank you
6 for all your good work.

7 CHAIRMAN CHAPMAN: Thank you, Michael.
8 Questions? Emily.

9 MS. OAKLEY: Thank you for your
10 comments on emergency management and
11 compensation. You said that was at one point on
12 the original Board's work agenda?

13 MR. SLIGH: Well, it was our
14 recommendations as well. We made recommendations
15 to the agency very concerned that there are many
16 crises that happened. In North Carolina we've
17 already had two such events this year, South
18 Carolina, Texas.

19 This is now, unfortunately, a very
20 common occurrence. Once the disaster happened,
21 it's too late because people don't have
22 electricity. They can't contact emergency

1 management. They're in a crisis so we have to
2 have this.

3 I was really excited to see your slide
4 yesterday about being able to map on a county
5 level. That's the kind of data that emergency
6 management needs to have ahead of time and the
7 farmers need to have that relationship and the
8 certifiers need to work with them so they
9 understand that.

10 We also are very aware that in a
11 crisis like that, their ability to be able to
12 avoid spraying organic farms is a very difficult
13 task, especially if it's an aerial application.

14 That's why we think this compensation
15 fund is an issue of fairness. I mean, if you
16 lose your crop by no fault of your own, you know,
17 we have to have a way to deal with that.
18 Unfortunately, this is part of our world now.

19 CHAIRMAN CHAPMAN: Harriet.

20 MS. BEHAR: Hi Michael. Do you feel
21 this compensation fund could be managed through
22 the National Organic Program, or do you see it

1 perhaps a partnership with maybe Farm Service
2 Agency or Risk Management? Do you have any idea
3 just to kind of help us with a start on this
4 because it is a big concept.

5 MR. SLIGH: Well, yes. I think all of
6 those options should be explored and we should
7 find the one that has the current already
8 capacity to do that. There are such compensation
9 funds in conventional agriculture around grain
10 bins, around all kinds of systems. This is not a
11 new concept.

12 I think it is something that could be
13 managed by numerous departments. I don't want
14 today to decide that it should be one or the
15 other but I think that's the conversation we need
16 to have.

17 We did explore this in some depth with
18 the last administration and had lengthy
19 conversations and even proposed a very finished
20 kind of compensation fund idea. That is
21 something that we could also resurface if that
22 was interesting.

1 CHAIRMAN CHAPMAN: Dan.

2 DR. SEITZ: Michael, as someone who
3 has a long history with the NOSB and OP, I was
4 wondering what your thoughts are on substances
5 that are being petitioned under Section 205.606?
6 My impression is that at the start there were a
7 number of substances that were useful, and then
8 there was the thought that we should not exclude
9 them but we want the organic supply to develop.

10 Our concern now, or at least the
11 concern of some of us, is that as substances are
12 added to that, it may actually retard the
13 development of an organic supply because it's
14 already on so there may be less of an incentive.
15 From your historical perspective, how do you look
16 at petitions under that section of the
17 regulations?

18 MR. SLIGH: Well, I mean, I think our
19 original thought and understanding was that we
20 would be in this continuous improvement phase and
21 that we wanted to do everything we could to
22 stimulate the organic alternative to all inputs

1 over time.

2 I would say that were we have been
3 handicapped is in the lack of sufficient organic
4 research in a timely proactive manner so that we
5 end up with all these bottlenecks. Once we
6 establish a substitute, it is, indeed, difficult
7 then to make that transition without having that
8 forward looking in that preparation.

9 I think it is a question of us being
10 more proactive and building that runway because
11 we can continue to grow the organic input market
12 and expand our capacity if we can kind of get
13 that train running in the proper order.

14 MR. CHAPMAN: I have a question for
15 you, Michael. So you mentioned the need for
16 fatty alcohols for sucker control. We reviewed
17 this a year ago and there was a lot of concern
18 around using a synthetic growth regulator for
19 primarily economic reasons. How do you --

20 MR. SLIGH: It turned out that the one
21 NOSB meeting I missed was Jacksonville. I was in
22 India and I was unaware of this whole question.

1 I've had tobacco farmers call me since then.

2 I've gone out and met with them,
3 looked at their alternatives, and realized that
4 we were very involved in the tobacco buy-out
5 debate in North Carolina and that these 300 farms
6 represent many conventional farmers who converted
7 to organic because they saw this as a better
8 market for them and they have a long rotation of
9 crops.

10 I would not have been in favor of a
11 petition that would have encouraged this product
12 for wide use beyond tobacco. I also would not be
13 supportive of this product as a long-term
14 solution. I would only be supportive of this if
15 we coupled it with a research priority on your
16 behalf, as well as going to OREI and making this
17 case. I think they have tried to find
18 alternatives.

19 I went and saw some of the effects of
20 the alternatives they tried. You may or may not
21 know in tobacco you need fewer bigger leaves with
22 really high quality to get a market premium. If

1 you don't sucker you get a lot of small leaves
2 and you lose your premium.

3 You try some of these other sprays
4 that burns the leaves or it doesn't work.
5 Unfortunately with the loss of the tobacco quota
6 program the size of acreage in organic has now
7 had to expand, a crop that used to be very much a
8 hand-held crop, if you will.

9 If you're talking 20, 40 acres and you
10 have to go out and hand sucker it every week for
11 10 weeks, that's totally unrealistic and they
12 would drop out if that's the only alternative
13 they have. They cannot afford that. It's kind
14 of a rock and a hard place in the short term.

15 CHAIRMAN CHAPMAN: Jesse and then
16 Emily.

17 MR. BUIE: So you are wanting this to
18 be restricted to tobacco only?

19 MR. SLIGH: It's my understanding that
20 the new petition that has been -- I'm sorry.

21 MR. BUIE: My question was -- the
22 question is that your petition is restricting

1 fatty alcohols to tobacco?

2 MR. SLIGH: It's not my petition but
3 it's my understanding that the tobacco farmers
4 are wanting it only for tobacco and that maybe
5 part of the error in the earlier petition was a
6 broader implication.

7 CHAIRMAN CHAPMAN: Emily.

8 MS. OAKLEY: So you said that you
9 would be interested in seeing this material
10 allowed exclusively for tobacco and for a short
11 time, until alternatives can be developed. I
12 just want to say I understand that thinking, but
13 my concern is that when a material is added to
14 the National List, at this point it's really
15 difficult to get it off, so I'm not sure that
16 alternatives would be developed.

17 MR. SLIGH: The original Board
18 recommended Chilean nitrate would go off in five
19 years. I do understand what you're talking
20 about. I think getting at your issue of how do
21 we couple the alternative research agenda linked
22 to the allowance of something that is not where

1 we want to be long term.

2 Those two have to be hand in glove.
3 I think there is still not. I think that is why
4 in my comments I'm trying to say those two things
5 must be linked together. The whole idea of
6 sunset was to be that you continuously look for
7 that improvement. I think we have to do a more
8 consistent job with it.

9 CHAIRMAN CHAPMAN: Harriet.

10 MS. BEHAR: We perhaps might look at
11 having a hard expiration date. We might do a
12 hard expiration date so then it would actually
13 sunset. That might be a way for some of the
14 members to get over there, but on this only give
15 it five years.

16 CHAIRMAN CHAPMAN: Paul, can you speak
17 to the hard expiration date?

18 DR. LEWIS: Yes. Harriet, I
19 appreciate what you're adding here but once the
20 material is added to the list, it goes through a
21 sunset process so it's going to be really
22 difficult to start addressing issues of having

1 expiration dates.

2 What you can do is you can look at it
3 in terms of the sunset process and look at that
4 as a renewal issue. In terms of saying over a
5 period of time once it's on the list, it's up for
6 renewal, not for an expiration as you're
7 characterizing it.

8 MR. CHAPMAN: All right. I've got one
9 last question and then we're going to let you go,
10 Michael. You commented here and in your written
11 comments you talked about making it -- rewarding
12 operations that continually have no
13 noncompliances. What would that mean in
14 operationally or tactically?

15 MR. SLIGH: I'm very honored and lucky
16 to get to work with organic farmers around the
17 world. The most consistent thing I heard from
18 farmers who have been involved in certification
19 for a very long time, and they don't have
20 noncompliance, and they pretty much get the same
21 kind of inspection every year and nothing really
22 changes and it's not that exciting, or even that

1 innovative for them.

2 I think as we think about a shift
3 toward a more risk-based model, we would put more
4 emphasis on where the problems are and we would
5 look at way to reward those farmers who have
6 noncompliance over a long period of time with
7 either a shorter, you know, easy form of your tax
8 form or a shorter inspection or something that
9 would reward them.

10 I mean, we're even talking, you know,
11 a little bit could you even have a bi-year. I
12 mean, these are the kinds of things I know have
13 problems with them and it's just at the debate
14 level. Strongly I believe that we are not
15 rewarding those farms that remain in compliance
16 long term sufficiently.

17 MR. CHAPMAN: Thank you, Michael.

18 MR. SLIGH: Yes. Thank you.

19 MR. CHAPMAN: Up next is Tom, followed
20 by Jamie Welch.

21 Tom, if you can start with your name
22 and affiliation.

1 MR. WARMUTH: Good morning. My name
2 is Tom Warmuth. I reside in Kure Beach, North
3 Carolina. I'm a biologist. I'm the lake and
4 pond municipal representative for BioSafe Systems
5 and pretty much work in water treatment and
6 surface water management.

7 BioSafe Systems is a privately owned
8 American company that manufactures
9 environmentally responsible disease and pathogen
10 control products. I would like to thank the NOSB
11 for the opportunity to speak in addition to our
12 written comments and supporting material.

13 I would also like to thank the other
14 written comment submitters for their support for
15 sodium carbonate peroxyhydrate, which I will
16 refer to as SCP to try to save time. And to
17 retain its listing of synthetic substances
18 allowed for use in organic crop production.

19 SCP is currently listed as an
20 alternative to copper sulfate. I would like to
21 give some supporting notations, aspects, and uses
22 of SCP in support of it.

1 Effective and sustainable chemistry
2 that associates in the water producing hydrogen
3 peroxide which is the real active which then
4 breaks down further into oxygen and water. As a
5 side note, SCP is widely used in safety.

6 It's also NSF and ANSI Standard 60
7 certified in potable water sources, drinking
8 water system, as well as waste water affluent
9 disinfection. It's used in drinking water as
10 well as waste water. It's used in whitening
11 toothpaste, dishwashing detergent, and laundry
12 determine as well.

13 There's a bit of focus on rice in some
14 comments, but SCP is clearly not just used in
15 rice waters, although I can see why there's a
16 focus there because you've got a lot of acreage,
17 a lot of water plants grown in water. But there
18 is a much larger use pattern in organic
19 irrigation ponds, irrigation canals that feed
20 organic waters, and it goes on and on from there.

21 In the organic markets we have two SCP
22 labels for use in water on many listed surfaces;

1 ground cover, mats, greenhouse floors, on crops,
2 animal bedding, and animal watering, and further
3 from there. The use of SCP is increasing over
4 time as more individuals learn of its potential
5 uses.

6 There is also a positive what I call
7 an organic influence with the continued listing
8 of SCP. It's not only organic farmers who
9 benefit from this chemistry, it's influential to
10 other non-organic farmers, lake managers, public
11 and private water body managers, potable waste
12 water entities, government agencies and other
13 current potential users are drawn to SCP as an
14 option and assured of the safety and benefits
15 because of that organic listing. A farmer may
16 not be certified organic but may want to do what
17 they can to be more organic or sustainable.

18 The benefits compared to copper
19 sulfate is really a matter of utilizing best
20 management practices or best product for a given
21 application. Copper sulfate may not be a
22 responsible option due to many factors.

1 Copper sulfate is one of the oldest
2 chemistries and it's use but it's limited in
3 water quality, poor water quality, increased
4 hardness, alkalinity, causes and teleconference
5 precipitate out of the water and into the soil
6 which then has problems with metallic copper in
7 your soil.

8 It doesn't have the poor efficacy
9 issues. It does not have any discharge or runoff
10 restrictions. It does not cause phytotoxicity or
11 plant growth or accumulate in the plant like
12 copper can. Using rice as an example, there are
13 studies showing soil copper toxicity in rice,
14 measurable copper in the chaff, and polished
15 grain has been also observed.

16 It goes on from there. Anyhow, it's
17 the position of the BioSafe Systems and so many
18 others that users of sodium carbonate
19 peroxyhydrate across the markets for use in
20 agricultural, horticulture, greenhouse growers,
21 cannabis, animal health, meat and poultry
22 processing, drinking, and waste water treatment.

1 Thank you.

2 MR. CHAPMAN: Questions from the
3 Board?

4 Emily.

5 MS. OAKLEY: I might as well since
6 this is my material. I just wanted to explain
7 that some of the references to rice was
8 originally allowed on the national list with the
9 hope that it would replace, or at least
10 substitute some use for copper sulfate. We
11 haven't seen that as a wide-spread use but that
12 was its original intention.

13 MR. WARMUTH: Right.

14 MR. CHAPMAN: Steve.

15 MR. ELA: I just want to follow up on
16 what Emily said. We did have questions
17 originally as we were looking at this whether it
18 was actually being used and whether it was
19 effective. From what I've heard, I think we've
20 had some public comments that it is being used.

21 Could you reiterate for sure that
22 there is actually use of it, for example, on

1 rice? I mean, I think really we're saying is
2 this an essential material and is it being used.
3 Is that correct that --

4 MR. SLIGH: That is correct, yes.

5 MR. ELA: Do you see that use
6 increasing?

7 MR. SLIGH: Yes, we do.

8 MR. CHAPMAN: Thank you.

9 MR. SLIGH: Thank you.

10 MR. CHAPMAN: Up next is Jamie Welch
11 followed by Shelly Connor.

12 MR. WELCH: My name is Jamie Welch.
13 I'm a scientist and also the product manager of
14 technology at EnviroLogix, which is a global
15 leader in GMO diagnostics, so feel free to use
16 this as a technical resource anytime you need us.

17 EnviroLogix advises customers
18 throughout the food supply chain on GMO sampling
19 and testing. The comments I have today pertain
20 to the proposed genetic integrity testing of corn
21 seed.

22 The absence of required GMO testing in

1 the USDA National Organic Program relations
2 provides the opportunity for unintended and
3 unrealized GMO contamination and certified
4 organic products.

5 The public disclosure is such elevated
6 GMO content in organic products could undermine
7 the consumer trust in the organic program and
8 damage brands. I think we can all agree that the
9 NOP does not need another damaging investigative
10 report.

11 GMO contamination of organic products
12 can occur at a number of points in the food
13 supply chain from cultivation to processing and
14 that would include seed contamination, GMO cross-
15 pollution, harvesting, transportation, storage,
16 and processing. A foundational requirement for
17 GMO-free seed or GMO-free organic products is
18 GMO-free seed.

19 The GMO concentration will only
20 increase from this baseline value. Organic
21 farmers deserve GMO data to make informed seed
22 purchasing decisions that align without end-

1 market needs.

2 Transparent GMO data requires the
3 communication of the GMO content level in each
4 seed lot. The traditional method for measuring
5 GMO contamination and seed is by PCR in a
6 reference laboratory where they are looking for
7 the GMO DNA sequences.

8 DCR analysis requires a highly skilled
9 scientific staff, requires dedicate lab space,
10 and also expensive instrumentation. The standard
11 cost for GMO testing of corn is about \$450 and
12 takes about five days to get test results back.

13 Some organic seed companies have
14 acquired in-house GMO testing capabilities to
15 reduce analysis cost and time to result. This
16 can be accomplished by employing immunoassay
17 strips to detect and quantify the concentration
18 of GMO proteins in raw grain and seed.

19 The EnviroLogix QuickScan system is
20 the global industry standard for non-GMO identity
21 preservation programs that need accurate decision
22 point testing. The total analysis time including

1 sampling, grinding, extraction, and running the
2 assay is about 10 minutes and the cost is \$35
3 which is about 1/13th the price of sending it out
4 for like a PCR result.

5 Anytime the standard can reduce the
6 cost and complexity of compliance without
7 sacrificing testing integrity should be
8 considered a positive development. It is
9 recognized that PCR analysis performed at an ISO
10 17025 accredited laboratory is being performed by
11 a trained scientific staff.

12 Therefore, the recommendation that
13 seed companies or farmers that perform
14 immunoassay testing in-house be required to have
15 annual training and successful general
16 proficiency samples is appropriate and warranted.

17 The introduction of this proposed rule
18 change is a positive development for the NOP and
19 the organic brand. It helps ensure farmers have
20 the information and tools they need to deliver
21 the quality organic product they seek to supply.
22 Thank you for your service and the opportunity to

1 provide some comment. I am open for questions.

2 MR. CHAPMAN: Harriet.

3 MS. BEHAR: Hi Jamie.

4 MR. WELCH: Hi Harriet.

5 MS. BEHAR: Just to be open, I did
6 talk to Jamie extensively.

7 Two questions. One is the proposal as
8 written. Do your tests meet the statistical
9 accuracy that we are requiring in the proposal?

10 The second is would you tell us what
11 percentage of your customers are organic seed
12 producers and how many are not organic seed
13 producers? Is it widely used in both areas?

14 MR. WELCH: Good questions. Yes, it
15 does meet the statistical accuracy that you're
16 talking about, the 20 percent relative standard
17 deviation around those different kind of levels
18 of GMO contamination.

19 Right now there are some organic seed
20 companies that are using this. An example would
21 be blue river hybrids which I think is one of the
22 largest, if not the largest, organic seed, corn

1 seed producer in the U.S. There are other seed
2 companies that are using it as well.

3 Our big markets are the non-GMO
4 identity preservation programs in the U.S., the
5 Cargill, ADM, Bunge run where they are testing
6 every truck that is coming through a facility to
7 verify what the GMO content is to know whether
8 they accept that or not.

9 MR. CHAPMAN: Dave.

10 MR. MORTENSEN: Thanks for the
11 presentation.

12 MR. WELCH: Sure.

13 MR. MORTENSEN: I was reading up on
14 your testing procedures and realized that it's
15 trait based so it could be a herbicide resistant
16 trait, a BT trait, etc., etc. Could you give us
17 a sense for the range in cost if you did the full
18 sweep of typical traits in, for example, maize
19 where it's maybe seven traits.

20 MR. WELCH: So the price that I gave
21 you, the \$35, is actually a comb that has 10
22 different strips on it. Each strip detects a

1 different trait so that is actually looking for
2 the complete -- the traits that have been
3 released to the marketplace.

4 Something for soy where there is
5 really only three or four traits that have been
6 released to the marketplace is a much cheaper
7 product which is only \$12 or something like that.

8 The price is reflective of how many
9 traits are out there. When new traits are added
10 to the marketplace, then we add new strips to the
11 comb to make sure there is complete coverage.

12 MR. CHAPMAN: Harriet. Harriet first
13 and then I'll get to you.

14 MS. BEHAR: Is there anyone who has
15 your system that will do the testing on a custom
16 basis for others? You know, people send them
17 samples and then --

18 MR. WELCH: Yeah. Illinois Crop
19 Improvement has our system. I'm trying to think
20 it there are some other state labs that might
21 have it. Maybe Iowa State has our system. There
22 are some options out there where if you didn't

1 want to invest in buying the system, or even have
2 the volumes that would justify buying.

3 Typically the smallest kit that we
4 have includes 40 tests so maybe you're not
5 processing 40 lots in a year so you could send
6 them off for analysis. That would probably still
7 be a cheaper price point as opposed to sending it
8 out for PCR analysis. The value is having it on
9 site and getting that real-time result if that's
10 needed. In certain markets it's incredibly
11 valuable.

12 MR. CHAPMAN: Asa.

13 MR. BRADMAN: I just want to
14 understand about your testing a little bit and
15 whether you're able to evaluate DNA methylation
16 changes, gene expression and not just alterations
17 in the code.

18 MR. WELCH: That's a good question.
19 Our test is actually testing the genetically
20 modified proteins that are being expressed. If
21 you're looking for some of the new gene editing
22 traits that will eventually be making it to the

1 marketplace, then this is not a product that
2 would actually satisfy that need.

3 I think the thought is that initially
4 if some of those new gene-edited traits make it
5 to the marketplace, it will probably be stacked
6 in some of these traditional transgenic traits,
7 the herbicide tolerances or the insecticidal
8 traits that are on the market. In that event,
9 this technology will be effective.

10 Once you start moving to new gene
11 edited traits that can only be detected through
12 molecular sequence identification, then you're
13 going to have to have some sort of onsite
14 molecular detection methodology.

15 CHAIRMAN CHAPMAN: Thank you.

16 MR. WELCH: Thanks.

17 CHAIRMAN CHAPMAN: Up next is Jamie
18 Welch followed by -- sorry. Up next is Shelly
19 Connor followed by Casey Hughes.

20 MS. CONNOR: Hello. My name is Shelly
21 Connor and I'm with Wild Farm Alliance. We are a
22 small non-profit led by a national group of

1 ecological farming advocates and wildlands
2 proponents who support farming practices that
3 promote sustainable food production and
4 biodiversity.

5 First, I want to thank you for passing
6 the recommendation to eliminate the incentive to
7 convert native ecosystems overnight to organic
8 crop land at your spring meeting.

9 We have begun work on a draft native
10 ecosystem guidance document and we are confident
11 in our ability to bring together a broad set of
12 stakeholders and to create a draft that will help
13 farmers, certifiers, and inspectors to determine
14 if the land contains a native ecosystem.

15 Once we by buy-in from the
16 stakeholders, we will hand our draft off either
17 to the NOP or NOSB depending on your capacity and
18 interest to move it forward. Second, we urge the
19 NOSB to create a working group to address marine
20 materials.

21 There is broad agreement that this
22 issue is important and that potential solutions

1 need to be explored. The working group members
2 should include marine biologists,
3 conservationist, farmers, companies that harvest,
4 and certifiers. This diverse set of voices will
5 bring important viewpoints to the table and work
6 together to find middle ground and a path
7 forward.

8 The kelp, seaweed, and algae species
9 being harvested are key parts of Marine
10 ecosystems and essential for providing habitat
11 for aquatic species and maintaining biodiversity.
12 Unsustainable harvesting coupled with the effects
13 of climate change will devastate these fragile
14 ecosystems and the wildlife they support.

15 This issue and how it is resolved
16 reflects the integrity of the organic label. The
17 label cannot be complicit in destroying our
18 ocean's health in order to grow food. We address
19 this issue in more detail in our written comments
20 submitted by my colleague Jo Ann Baumgartner.

21 Finally, the NOSB decision-making
22 process needs to remain transparent. We are

1 happy to hear that the notes from the
2 subcommittee meetings will be made public again.
3 This transparency will ensure sound decision
4 making.

5 Thank you for your service on the NOSB
6 and your work to maintain the integrity of the
7 label.

8 CHAIRMAN CHAPMAN: Questions?

9 Emily. Asa.

10 MR. BRADMAN: I just want to make a
11 comment about you mentioned a middle ground with
12 marine materials. Just from my perspective,
13 there shouldn't be a middle ground when we think
14 about the language for this. We want to come up
15 with a system that protects newer environments
16 and then we'll adapt any use for organic
17 agriculture to that.

18 But I wouldn't think of it as a
19 compromise. Rather, what is the best approach to
20 protect the wild environment. Just a semantic
21 issue but I want to make at least my point on
22 that. Thanks.

1 MR. CHAPMAN: Emily.

2 MS. OAKLEY: So I wanted to ask the
3 Program about the draft guidance that the Wild
4 Farm Alliance is working on. I know this is a
5 different regulatory situation that we're working
6 in but as they continue to work on this draft
7 guidance, what would be the best approach to
8 engage with them on that effort?

9 DR. LEWIS: Let me try to address
10 that, Emily. I think in this case to engage with
11 the program is to have conversations with us. We
12 are happy to explore what they're thinking about
13 and to just engage with us is really the best way
14 to handle it.

15 MS. OAKLEY: So does that mean they
16 should just contact you directly with some of the
17 work that they are thinking of doing and create a
18 dialogue with you?

19 DR. LEWIS: Sure.

20 CHAIRMAN CHAPMAN: Thank you.

21 Up next we have Casey Hughes followed
22 by Orlando Rojas Esquivel. Sorry if I said that

1 wrong.

2 Start with your name and affiliation.

3 MS. HUGHES: Good morning. My name is
4 Casey Hughes and I'm speaking to you on behalf of
5 the National Organic Coalition. Thank you for
6 the opportunity to address the Board. I thank
7 each of you for the important work that you do as
8 volunteers on the NOSB.

9 This morning I'll be discussing three
10 topics; use of antibiotics in day-old chicks, the
11 need for comprehensive review of sanitizers,
12 cleansers, and disinfectants, and the use of BPA
13 and organic food packaging.

14 Antibiotics. NOC supports the need to
15 eliminate the use of antibiotics in poultry in
16 all stages of life. As our colleague Charlotte
17 Vallaeys outlined in her comments, even though
18 antibiotics are prohibited in organic production,
19 there is an exception for the use in day-old
20 chicks. We appreciate the Board's work on this
21 issue and we are prepared to support the Board
22 for their advocating to the USDA.

1 Sanitizers, cleansers, and
2 disinfectants. The NOSB would benefit from a
3 comprehensive review of these substances to
4 inform decision making when a new material is
5 petitioned or a material is reviewed at sunset.

6 The NOSB could refer to this review to
7 judge whether materials currently on the national
8 list meet the same need or if there's a special
9 characteristic to the material under review that
10 justifies its placement or renewal on the
11 national list.

12 This review may help the Board
13 identify areas where there are gaps in necessary
14 materials to aid in the promotion of organic food
15 safety. A reference document of this kind would
16 create efficiencies, saving time and energy for
17 the Board during a material review process. As
18 we have heard from Dr. Tucker, this is a priority
19 when approving agenda items for the Board to work
20 on in the future.

21 Lastly, BPA. The NOSB must have the
22 ability to advance issues of importance to

1 organic stakeholders such as packaging substances
2 like BPA that are used in organic food handling.
3 BPA opposes serious hazards and not support this
4 elimination from organic food packaging.

5 At the same time, known alternatives
6 might also present some problems and NOSB should
7 approach the issue of good packaging in a
8 comprehensive way. We strongly suggest that the
9 NOSB inform its deliberations with a technical
10 review on BPA and BPA alternatives.

11 While the NOP no longer finds this a
12 priority, we urge the NOSB to request this be
13 added to the work agenda as a priority for
14 organic stakeholders. Thank you for considering
15 my comments.

16 CHAIRMAN CHAPMAN: Thank you.

17 Questions? Harriet.

18 MS. BEHAR: How does BPA and your
19 concern about it affect your food purchases? Do
20 you try to somehow seek out food that is packaged
21 with a label that says no BPA? I'm not sure why
22 you care. Tell me why.

1 MS. HUGHES: Sure. In my person view,
2 I feel it is a very consumer-facing issue
3 obviously and something that has side-spread
4 attention in the marketplace. I do avoid it and
5 I would say my peers also have this awareness and
6 avoid products with BPA on the packaging.

7 CHAIRMAN CHAPMAN: Thank you.

8 Up next is Orlando followed by Laura
9 Gomez. I understand we may need a translation on
10 this speaker.

11 MS. OAKLEY: Point of order.

12 CHAIRMAN CHAPMAN: Yes.

13 MS. OAKLEY: If someone needs a
14 translation, can we give them double time?

15 CHAIRMAN CHAPMAN: Nope.

16 MS. OAKLEY: Really?

17 CHAIRMAN CHAPMAN: No.

18 MS. OAKLEY: Why not?

19 CHAIRMAN CHAPMAN: It's three minutes
20 per speaker for the speaking amount.

21 MS. OAKLEY: I would move that we give
22 them double time.

1 CHAIRMAN CHAPMAN: We have
2 approximately, I think, five or six speakers.

3 MS. OAKLEY: Thank you.

4 (Responses for Mr. Rojas are given by
5 a translator.)

6 MR. ROJAS: Good morning. My name is
7 Orlando Rojas from Costa Rica. I used to be a
8 dairy farmer since my childhood and for the last
9 10 years I've been an organic farmer that we
10 established with my family in order to protect
11 the health of my family.

12 I'm also the president of the Organic
13 Pineapple Cooperative Cooeproagro that carries
14 26 families that are searching for environmental
15 care and financial support for their families.
16 I'm also the president of the Organic
17 Agricultural Board of Costa Rica.

18 The project is run by myself, my wife,
19 and my son and daughter, plus eight employees.
20 We are working up to 30 -- I'm going to translate
21 hectares to acres for the audience and you guys
22 to understand more the area. Fourteen hectares

1 means 30 acres.

2 As you can see in the picture, I am
3 also -- well, my project supplies the drone
4 imagery and services for the co-op. All the
5 inventory would be drone imagery for technical
6 reference.

7 We have our own spraying system to
8 apply all the fertilizers and make the flower
9 induction. It's called a spray room. We use
10 four pounds of ethylene per application which you
11 can see in the picture. We also are a flower
12 induction service for the co-op. With the
13 penalty, I hope to continue our business for our
14 family and the employees. Thank you.

15 CHAIRMAN CHAPMAN: Thank you.

16 Any questions? Harriet.

17 MS. BEHAR: How many years in
18 succession will the field stay in pineapple?

19 MR. ROJAS: How many years in a row?

20 MS. BEHAR: My understanding is that
21 there is really not a crop rotation other than
22 fallow time where there might be a cover crop and

1 that pineapple is grown year and year in the same
2 field. I'm just wondering how many years can
3 that be sustained without possibly disease or
4 insect problems.

5 MR. ROJAS: The pineapple cycle takes
6 30 months from planting to planting. In that
7 division we use legumes as a rotation crop and
8 the crop takes three months. With organic matter
9 input we can go up to four cycles. That means 12
10 years.

11 CHAIRMAN CHAPMAN: Thank you very
12 much.

13 Up next is Laura Gomez followed by
14 Nestor Ramirez.

15 MS. GOMEZ: Good morning. My name is
16 Laura Gomez and I come here to speak on behalf of
17 a lot of families including mine that are small
18 organic pineapple farmers from different parts of
19 Costa Rica.

20 I thank you so much for giving me an
21 opportunity to express our great concern that the
22 NOSB might decide to ban the ethylene use in the

1 organic pineapple flower induction.

2 My husband, my two daughters, and
3 myself run a little organic pineapple farm in La
4 Virgen de Sarapiqui since 10 years ago. Our
5 whole production is exported by Coopeproagro, a
6 farmer co-op that we founded with 26 other
7 families three years ago.

8 Our whole production is actually being
9 sold to the American west coast under the co-op's
10 brand name Eco Sweet Organic Pineapple. To
11 fulfill our fruit needs all year around we need
12 to program volumes every week of the year in a
13 constant manner.

14 That is why letting the crop to flower
15 naturally will never let us accomplish the agreed
16 volume since this would leave us with no control
17 of the quality and timing of the fruit making it
18 impossible for us to grow this way.

19 The use of ethylene allows us to have
20 security and efficiency in the fruit production
21 and a rotation of the plantation since all the
22 fruit will flower at the same time allowing us a

1 controlled fruit volume to deliver.

2 We have implemented the technology of
3 ethylene flower induction in our farm with a very
4 accessible investment in our spray room that
5 won't reach the \$700. The ethylene gas is very
6 cheap and we use very few to make our crop
7 flower.

8 All our farmers have this spray room
9 regardless of how small they are. We all have
10 been trained in good agricultural practices and
11 labor safety for the proper use of the ethylene
12 cylinder.

13 The PVC pipes we use in our spray room
14 were installed since nine years ago and they are
15 fully compliant with the global gap protocols and
16 labor safety. It is not true that we as small
17 farmers can't have access to this technology. It
18 is accessible to all growers.

19 Please keep the ethylene in the list
20 for use in organic pineapple. We are working
21 hard to supply the American market with our super
22 sweet healthy fruit and we need certainty on the

1 regulations to keep making our wonderful product
2 accessible to the most population all year
3 around. Thank you very much, and pura vida.

4 CHAIRMAN CHAPMAN: Sue and then
5 Harriet.

6 MS. BAIRD: How often do you have to
7 spray ethylene gas?

8 MS. GOMEZ: Once a year.

9 MS. BAIRD: Once a year application?

10 MS. GOMEZ: Yes.

11 MS. BAIRD: Do you feel -- I'm sorry.
12 Do you feel as if applying or spraying with
13 ethylene gas improves the quality of your fruit
14 and, therefore, would enhance pest management?

15 MS. GOMEZ: It helps us regulate the
16 flowering so we can spray for the pesticides. We
17 have a perfect fruit. Well, the best fruit we
18 can.

19 MS. BAIRD: So it's serving two
20 purposes then?

21 MS. GOMEZ: Yes.

22 CHAIRMAN CHAPMAN: Harriet.

1 MS. BEHAR: Is there any ongoing
2 research on other methods or natural materials
3 that could replace ethylene going on in Costa
4 Rica?

5 MS. GOMEZ: They have like other
6 things but none has really -- I'm really not into
7 very much technical but for us we don't have
8 anything better than that. The research has been
9 bad I guess. This is our only option.

10 CHAIRMAN CHAPMAN: Dave.

11 MR. MORTENSEN: Thank you for the
12 presentation. I was curious do you share the
13 spray equipment across the cooperative members?

14 MS. GOMEZ: No. We are kind of far
15 away from the others. We have our own equipment.

16 CHAIRMAN CHAPMAN: Thank you.

17 MS. GOMEZ: Thank you.

18 CHAIRMAN CHAPMAN: Up next is Nestor
19 Ramirez followed by Rolando Soto.

20 (Responses by Mr. Ramirez are given by
21 a translator.)

22 MR. RAMIREZ: Hello. My name is

1 Nestor Ramirez. This morning I will share some
2 pictures of my operation, my farm, with my
3 family. The farm is located in the northern
4 plains of Costa Rica very close to the Nicaraguan
5 border.

6 We are very proud to be in the organic
7 business. Getting to know the other person is
8 very well kept in labor safety and environment is
9 very encouraging for us. This story can't
10 continue if the ethylene is going to be banned
11 from our operations.

12 I attend the Stow meeting in 2015.
13 One of the tasks that the NOSB at that time
14 ordered was to look out for some research about
15 options of ethylene. After doing a lot of
16 consultation with some colleagues and some
17 universities in Costa Rica, he is bringing four
18 research projects about use of ethylene options.

19 The first one was in 2003, 2006 the
20 second one, and we just finished in 2018 two
21 research projects because we were to have the
22 discussion in 2020 so we needed to rush. We have

1 the results here for you to have a copy. In none
2 of them we have had a positive or good result to
3 finding some other options.

4 The use of smoke was checked, cold
5 water with ice, and ice. None of them are a
6 feasible option. I have copies of the research.
7 2003 and 2006 investigations are going to be
8 given complete to you. The final investigation
9 results this year we just finished so it will be
10 handed to you according to the opportunity.

11 Thank you.

12 CHAIRMAN CHAPMAN: Questions from the
13 Board? Sue.

14 MS. BAIRD: Yes. Thank you very much.
15 I really appreciate that. I'm going to ask you
16 another question. What pollinators do you use to
17 pollinate your flowers?

18 MR. RAMIREZ: The bees are natural
19 pollinators in the crops of Costa Rica.

20 MS. BAIRD: So you don't have to
21 import honey bees or anything like that? You're
22 just using natural --

1 MR. RAMIREZ: No import.

2 MS. BAIRD: Okay. Thank you very
3 much.

4 CHAIRMAN CHAPMAN: Dave.

5 MR. MORTENSEN: This is a crop that I
6 don't know very much about and I've learned a lot
7 from the presentations. Could you explain to us
8 what happens with the fruit maturation process if
9 you don't spray ethylene?

10 MR. RAMIREZ: If we don't use
11 ethylene, we can't program the harvest.

12 MR. MORTENSEN: You can't properly
13 harvest?

14 MR. RAMIREZ: No, we can't program the
15 harvest.

16 MR. MORTENSEN: Oh, you can't program
17 the harvest. You can't schedule when the fruit
18 will be ready to harvest. Is that correct?

19 MR. RAMIREZ: It's impossible to
20 operate a farm when you don't know when the fruit
21 is coming.

22 MR. MORTENSEN: Okay. Thank you.

1 CHAIRMAN CHAPMAN: Steve.

2 MR. ELA: Do you use the same rotation
3 cover cropping that the previous speakers
4 mentioned?

5 INTERPRETER: Pardon me?

6 MR. ELA: The rotation or the cover
7 cropping, the fallow time, is that similar on
8 your farm as the others?

9 MR. RAMIREZ: You can see in the image
10 in the presentation -- as you can see in the
11 picture, all the borders of the farms are covered
12 with green covers.

13 In this case, he uses corn and some
14 plantains to separate the neighbor farms and keep
15 the integrity of the crop, and the production of
16 these parts are distributed among the employees.
17 Also, when he plant after one cycle, after the
18 plastic mulch removal, it leaves the soil to rest
19 for 30 days. In the tropics the natural
20 vegetation will grow again and break the cycle.

21 MR. ELA: Are all of your crops grown
22 organically and is there any issue with GMO

1 contamination of your corn?

2 INTERPRETER: Pardon me?

3 MR. ELA: Are all of the crops used in
4 rotation grown organically and is there any
5 problem with GMO contamination of the corn crop?

6 MR. RAMIREZ: All the inputs that we
7 use on the farm are authorized by the
8 certification agency. Specifically to that
9 question, the corn is a local variety that we use
10 so there is not any imported seed.

11 MR. SOTO: Good morning, I'm Rolando
12 Soto from Costa Rica, and I have been a producer
13 of organic pineapple for ten years. And I'm part
14 of the Association of Bioecological Producers of
15 the North of Costa Rica, Probio.

16 Organic station is formed by 36 more
17 producers with no more than five hectares each
18 and it is the support of 450 families which is
19 the equivalent of ten percent of organic
20 production in Costa Rica.

21 We have been working on this project
22 for ten years located in one of the poorest areas

1 in the country, such as the county of Upala and
2 Guatuso, both in the north part of the country.
3 We have worked the land for many years. We are
4 farmers who love organic agriculture, and we're
5 looking for continuous improvement.

6 2.6 percent of the exports in Costa
7 Rica is organic pineapple. And there is a
8 tendency to increase that volume which causes
9 environmental improvements and healthier
10 products.

11 However, this does not motivate
12 scientists and big suppliers to come up with more
13 efficient alternatives for flower induction for
14 organic pineapples. There isn't a great variety
15 of supplies for organic production.

16 The absence of ethylene for flowering
17 will cause a disappearance of organic production
18 affecting the environment and American customers
19 who want organic pineapple and families who live
20 out of this organic production.

21 (Off the record comments.)

22 MS. BEHAR: You can give the

1 translation for that.

2 INTERPRETER: Okay.

3 MR. SOTO: In conclusion, we want
4 ethylene to remain an approved product for
5 organic production as the only supply for
6 flowering at this moment. Thank you.

7 MS. BEHAR: Questions? Emily.

8 MS. OAKLEY: Where is the increase in
9 organic production coming from? Are conventional
10 fields being transitioned to organic? Or are
11 other organic crops being transitioned to
12 pineapple? Are needed ecosystems being converted
13 to pineapple?

14 MR. SOTO: More people are consuming
15 organic products, including pineapple, so they
16 believe that conventional will convert to
17 organic.

18 MS. BEHAR: I have a quick question
19 myself. I don't see anyone else. Are all of the
20 pineapples being shipped into the US market, are
21 they going domestically and perhaps overseas,
22 maybe European Union or other countries?

1 MR. SOTO: They ship also to Europe,
2 but mostly American.

3 MS. BEHAR: Gracias.

4 MR. SOTO: Thank you.

5 MS. BEHAR: Next up is Luis Carlos
6 Gonzalez Miranda and on deck is Christian Herrera
7 Leon.

8 MR. GONZALEZ: Hello, my name is Luis
9 Carlos Gonzalez. I'm an organic pineapple
10 farmer.

11 I want to speak about the importance
12 of the use of ethylene in the uniformity of the
13 production of the pineapple crops, either in
14 conventional as in organics.

15 All the agricultural practices done in
16 the pineapple crop is to achieve a uniformity of
17 the plantation within the same lot. This is the
18 very beginning of the land preparation which is
19 very important. We try to achieve the best
20 conditions to have the uniformity in the
21 planting.

22 Then we do the plastic mulch coverage.

1 We have three kinds of planting materials as you
2 can see in the picture. Those three types can be
3 mixed in the same lot. We need uniformity.

4 Those then must be selected by weight
5 to have the same size. As you can see in the
6 picture, you can mix in the plantation different
7 size of plantlets. Then that will give different
8 types of pineapple. In this chart, you can see
9 the uniformity of the planting material within
10 the lot, all over the place.

11 At nine months, you achieve enough
12 weight to make the flower induction at the
13 plantation. We need to achieve six pounds for a
14 plant to have a good size of the fruit.

15 Next please, next. We do the
16 applications of ethylene at low temperatures to
17 reduce the volatilization of the ethylene. We
18 mix it with -- charcoal to capture the gas and
19 release it in the water and release it in the
20 plantation.

21 I'm just going to finish relating the
22 chart. It's not dangerous, like 30 years of

1 experience using, very low cost per acre,
2 efficiency of more than 95 percent in the
3 applications, and a plantation where the ethylene
4 is not violent. Muchas gracias.

5 MS. BEHAR: Gracias, Maestro.

6 (Laughter.)

7 MS. BEHAR: Next up is Christian
8 Herrera Leon, and on deck is Oscar Salas Porras.

9 MR. HERRERA: Hello, good morning.
10 It's an honor to be here addressing to this new
11 Board. We were in Vermont three years ago on the
12 same issue. My name is Christian Herrera. I'm
13 the general manager of Cooperagro, this organic
14 club that you have been hearing of.

15 So far, we're located in the
16 northern
17 place of Costa Rica in the humid, tropical region
18 with a precipitation of 4,000 millimeters of rain
19 through the year with a variation of temperatures
20 of 100 degrees Fahrenheit and the lowest, that we
21 call it cold for us, is reaching the 65s.

22 So here you must understand that

1 Michelle always chooses the coldest weather like
2 Vermont in here to make us freeze, okay.

3 (Laughter.)

4 MR. HERRERA: Our operation is 100
5 percent full organic area. It's 26 families
6 associated that work in the field in the
7 projects, 350 acres so far with an expansion of
8 maybe 100 percent of the area for the next couple
9 of years with a huge investment.

10 And we are direct exporters to Europe.
11 We are accredited, and we have in Costa Rica our
12 own law, our own decree that rules all the
13 organic farming in Costa Rica. And we have the
14 equivalency recognized by the European community.
15 So the government checks and fiscalizes in the
16 farms, has the approval to get to the European
17 markets.

18 So we have to achieve three different
19 certifications. We have to run the USDA organic,
20 we have to run separately the European
21 certificate plus our national decree. And
22 stapled to that, we need to include the Good

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Agricultural Practices and Operations.

Our technology package, as you have seen, we love technology, so we have a multi-disciplinary team in there as associates of the co-op. It's a technical -- unified technical practice, so we are a multi-site farming and NOAA GPO, because we use the same technical package.

It's so fascinating, myself being four years in the organic business, coming from conventional to organic, all the passion invested in the growers, checking all this new world of biological controls, which is completely, I think, newly born.

And we have to do a lot more research. In the picture, you can see trichoderma affecting our fusarium, which is the biggest plant -- disease in the crop. So we need to keep on doing more research.

That's a picture of the rotation of the crops. Normally in Costa Rica, our legumes can take up to three months to grow. And we shred everything to reincorporate the vegetation

1 back to the fields before fructification so we
2 won't increment the weed growth within the crop.

3 But the normal resting time that we
4 leave is no less than six months, because after
5 that we just leave the natural vegetation to
6 break up, and it's covered by weeds. And then
7 everything is shredded.

8 By the way, pineapple crop is one of
9 the most -- the plantation that most puts biomass
10 back into the soil with 350 tons of fresh biomass
11 each cycle of three years, okay. All that
12 plantation in case of organics is shredded back
13 to the soil, okay.

14 MR. CHAPMAN: Thank you, thank you.
15 Any questions? Emily?

16 MS. OAKLEY: Thank you. You talked
17 about the expansion of the organic pineapple
18 industry in Costa Rica. Is that conversion from
19 conventional to organic? And does any of it
20 include conversion of native forests into organic
21 production?

22 MR. HERRERA: Well, Costa Rica, we can

1 brag about worldwide that we have 25 percent of
2 our area protected by law in national parks. So
3 25 percent of the Costa Rican area is already
4 protected. We are a country that is smaller than
5 the Minnesota state. So we're pretty small. We
6 don't have more land to grow.

7 In transition, specifically in
8 pineapple transition, when you don't have any in
9 between seal, or you're organic or you're not, so
10 you're going to -- you have to grow for three
11 years. And the cycle takes, in three years, two
12 crops. So you have to harvest twice in the same
13 area being sold as conventional to achieve that
14 transition.

15 And you're going to lose no less than
16 \$40,000 per hectare which could be, like, around
17 \$20,000 per acre planted in a transition time of
18 three years. So for us, it's much cheaper just
19 to leave the area resting for those three years,
20 with the timeframe that the certification allows
21 us, to achieve the transition.

22 So yes, there are areas now, very few,

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being transitioned from conventional to organic that way, leave resting for two years. But for the grower, it's a huge investment because we have to leave our land, which is very limited in Costa Rica, resting with no more income then. So we have to make good that numbers in the financial structure to convert that.

And the last question from the other exposier, many of the cattle areas that are going into crisis because of productivity yields whatsoever, that is expensive cattle farming. There are some of the farms that might be choosing to convert into pineapple crops after logically the authorization of first the government, and then the certification agency.

MR. CHAPMAN: Dave?

MR. MORTENSEN: Yes. Your photographs were showing us the cover crop, the legume cover crop. With the cooperative, is the cover crop's something that is part of a best management practices followed by all?

MR. HERRERA: Well, we have to renew

1 the certification every year. And now, because
2 of some bad histories about fraud happening,
3 Costa Rica with organic pineapples, okay, we have
4 pushed the certification to go with the net area.

5 It's not the same thing of certifying
6 100 hectares of apples, which is for perennials,
7 instead of a crop that cycles very fast. You
8 need to keep on planting pineapple every week to
9 achieve the weekly program every week next year.
10 So we have all the activities being done the same
11 week all through the farm.

12 So that means that there is a big
13 difference between the gross area of the farm
14 which in the past the certification agency used
15 to put only the total acreage of the farm and not
16 the net area being planted for pineapples.

17 In the last three years, the Organic
18 Chamber, with the community grower, has pushed
19 the certifications in case of pineapples to make
20 the mass balances more detailed to when the fruit
21 is coming. So the mass balances now, now we see
22 a certifications saying they would train in the

1 crop, okay, and we design how to keep the record
2 of the mass balances strict to the area to be
3 planted.

4 Now in pineapple, in organic
5 pineapple, it takes four months than
6 conventional, because our growth is much slower
7 because of nutrition. So that means that we can
8 be -- from planting to harvest we can go from 14
9 to 15 months, okay.

10 So depending on the timing, the
11 certification shows up making the audit. Then we
12 can tell these crops will be harvested within the
13 next year, and that will give us in specific
14 tons, and this is the mass balances.

15 The next year, they're going to match
16 what we program, but we can't grow more than what
17 we stated last year before. Because then we
18 reduce the open space where you can put some
19 other goal is, right?

20 MR. MORTENSEN: So I'm not sure my
21 question was so clear. I just wanted to know --
22 that was very helpful -- but are cover crops

1 being used routinely, regularly, by you and your
2 farmer colleagues?

3 MR. HERRERA: Yes. Well, in the
4 experience of Costa Rica, being the worldwide
5 leader in pineapple export, is that we have
6 already crops that have 35 years constantly,
7 conventional.

8 So we have been working very hard the
9 last three years, because the European community
10 is starting to check the nutrient -- the
11 nutrition contents of the soil and what you get
12 out of the harvests. And then in pineapple crop
13 you get up to 100 tons out every harvest.

14 So it's really intense. And for us
15 it's very challenging. But we have been working
16 that organical package, and the nutrition program
17 will input the exact amount of nutrients that we
18 take out. So that will guarantee the
19 sustainability.

20 And now, using legumes that are with
21 a fixation of 50 to 90 kilos of nitrogen per
22 hectare, remember we're in the tropics, we have

1 growth all year round. So it's been fascinating,
2 personally in my case, to keep on just getting to
3 learn all this technology that all the growers
4 have been really pushing to learn about.

5 I don't know if that -- okay, we're
6 here 35 years dealing already with the same
7 yields. And we don't use no herbicides to
8 destroy the plantation, to plant again as fast as
9 we can, so we have to shred everything in green.

10 And that means a lot of machinery and
11 a lot of biomass going into the last -- by the
12 way, last week we were checking the biomass
13 nitrogen input of the crop. And we were getting
14 up to 500 kilos of nitrogen every three-year
15 cycle. Because all the biomass goes into the
16 shredder with decomposers, and yams, and all
17 this.

18 MR. CHAPMAN: Thank you. Dan?

19 DR. SEITZ: Can you use the plastic
20 mulch more than once? And how -- it appears that
21 you're using a lot of that. How are you then
22 disposing of the plastic mulch? And is that a

1 problem for you?

2 MR. HERRERA: Well, in the matter of
3 fact, there is a lot of -- a big movement of the
4 conventional farmers to go in using plastic mulch
5 because they can avoid the use of herbicides.

6 In our case, in organic, we need the
7 use of plastic mulch. And what we have done for
8 the last three years is to use a slightly thicker
9 plastic, because the cycle takes 32 months. So
10 plastic, being exposed to this humidity, to the
11 heat, during 30-something months, there's going
12 to be -- if it's too thin, it's going to destroy.
13 And then we're going to have a headache picking
14 it up, you know, manually.

15 So we're going to a thicker plastic,
16 so it's much easier to remove all the carpet.
17 And then we send it to the recycling agencies.
18 And thankfully, in Costa Rica, we have the banana
19 business giving a lot of plastic material, so we
20 have a big industry of recycling all these
21 agricultural plastic products.

22 MR. CHAPMAN: Sue?

1 MS. BAIRD: Did I understand that
2 you're certifying under an internal control
3 system group certification?

4 MR. HERRERA: Pardon me?

5 MS. BAIRD: Your certification
6 program, are you certifying under a group
7 certification process?

8 MR. HERRERA: In GLOBALG.A.P.
9 certification we are multi-sites. Since we are -
10 - the farm grows itself within the growers. And
11 in the USDA organic specific, yes, with a group
12 of growers.

13 MS. BAIRD: Okay. I just wondered
14 that. Personal, do you know Luis Brenes?

15 MR. HERRERA: Luis Brenes, yes. We
16 have had some arguments in the past. Yeah, he's
17 very knowledgeable. But, well, he's one of the
18 leaders in organic technology in Costa Rica. But
19 --

20 MR. CHAPMAN: That's enough.

21 MR. HERRERA: We have had some
22 argument with him. He's very clever and very

1 knowledgeable about everything.

2 MR. CHAPMAN: I don't think Luis is on
3 our agenda today so --

4 MR. HERRERA: And I would love to
5 understand why those laughs are?

6 MR. CHAPMAN: Thank you.

7 MR. HERRERA: Because I don't know if
8 --

9 MR. CHAPMAN: Thank you for that --

10 MR. HERRERA: -- he's a character up
11 here.

12 MR. CHAPMAN: I do have a question for
13 you as well. I'm curious to know, because we've
14 gotten some questions about rotational practices
15 in pineapple. Would a change in your rotational
16 practice have an impact on your need to use
17 ethylene?

18 MR. HERRERA: Well, I think in the
19 rest of the presentation you might see that if we
20 leave a pineapple crop naturally to flower by
21 themselves, there's been a slight tendency it'll
22 be seasonal because of all period temperatures

1 are cold weather, like go down to 65.

2 Below 68, the plantation will go into
3 stress because of the cold weather. And then it
4 will start releasing the endogenous ethylene.
5 And then it will start popping like popcorn all
6 over the plantation.

7 So then, you -- in the pineapple crop
8 and even more in organic, you just can't go with
9 the personal every time just to pick what is
10 ripened. And it's something that we really
11 argued with Mr. Bondarela (phonetic) three years
12 ago.

13 It is not a matter of just going into
14 your orchard, just picking up what you find ripe.
15 You need to program containers. Each container -
16 - with an organic we're making 3.5 containers per
17 hectare of harvest. And we need to fill a 20-ton
18 container. So it's not a matter of just going
19 randomly picking up what is ripened all around.

20 Then we're going to have a big gap in
21 August with no fruit, and the market will suffer
22 that. And the shelves in the supermarket will be

1 empty, replaced by any other conventional
2 product. And then we'll have a peak of
3 production that will come from May to July.

4 And then the market will crash,
5 because we know that organic market is really
6 sensitive and sensible to over-production. So
7 the way of -- and just for example, one of the
8 reasons we spray everything -- and thankfully
9 pineapple crop absorbs everything fully through
10 the axiles -- is that we don't put personnel in
11 there.

12 And we have a density of 60,000 plants
13 per acre, 25,000 square acre. So it's really
14 tight to put person in there making a mechanical
15 damage to let disease getting in.

16 (Foreign language spoken.)

17 No mechanical damage. So as soon as
18 it is planted, just maybe the blood meal that we
19 go and put with a little spoon, ten grams per
20 plant, and then no more personnel until harvest.

21 We have to keep that plantation
22 steady, not being mixed. So it's impossible to

1 think of going every time just picking pineapple.
2 Then sizing is a thing. We have a three-kilo
3 fruit, which is a jumbo four, size four, and then
4 for Northern Europe we're sending 12 which is
5 like a pound and a half fruit.

6 MR. CHAPMAN: Chris, I'm going to wrap
7 it up here. Because we do need to move on. I'm
8 understanding, correct me if I'm wrong, that
9 regardless of the rotational crop, you would
10 still need ethylene.

11 MR. HERRERA: Definitely.

12 MR. CHAPMAN: Thank you.

13 MR. HERRERA: Definitely. There is no
14 option, and there's the research. Now we comply
15 with you guys that there's the research done by
16 universities. There's still warm, you know, the
17 old one just closed last week.

18 MR. CHAPMAN: Thank you.

19 MR. HERRERA: So thank you very much
20 for your comments.

21 MR. CHAPMAN: Thank you very much. Up
22 next we have Oscar Salas Porras and then on deck

1 is Olman Briceno Fallas. Sorry, I am butchering
2 names. I should give this back to Harriet.

3 Oscar, if you could start with your
4 name and affiliation.

5 MR. PORRAS: Good morning to all,
6 thank you for your attention. I am the Executive
7 Director of the Organic Agricultural Chamber in
8 Costa Rica.

9 Don't worry, I am not in technology,
10 so I'm going to be brief. In Costa Rica, the
11 engineers are the ones that speaks and takes the
12 show.

13 After the Board meeting in 2015, all
14 the organic production growers understood that
15 they needed to gather efforts. And they
16 established the Organic Agriculture Chamber in
17 early 2016 to help the government implement all
18 the legislation and the rules to guarantee the
19 integrity of our industry.

20 The Chamber wasn't born to make
21 locally in the government of Costa Rica, or with
22 our commercial partners outside of Costa Rica, to

1 release or ease the rules to make it easier. The
2 reason the Chamber was born was to implement the
3 strictest and latest legislation rules for the
4 industry.

5 Now the Chamber represents 95 percent
6 of all the area of organic pineapple in Costa
7 Rica. One of the most important achievements the
8 Chamber has done is for us to put up to the Costa
9 Rican Congress an investigation about the organic
10 fraud that happened in the latest years with a
11 conclusion from the Congress of Costa Rica about
12 that.

13 Our Chamber is here to support all the
14 ruling that the NOSB and the NOP in general will
15 issue about our industry and puts into your
16 access all the technology and information that we
17 have gathered among our associates.

18 In this case specifically, we wanted
19 to ask to keep the ethylene in their list,
20 because otherwise we cannot grow. Thank you.

21 MR. CHAPMAN: Questions?

22 (No audible response.)

1 MR. PORRAS: Thank you.

2 MR. CHAPMAN: Thank you very much. I
3 think we used a lot of questions on the last
4 speaker.

5 (Laughter.)

6 MR. CHAPMAN: Olman is up next
7 followed by Wendy Jimenez. You can start with
8 your name and affiliation.

9 MR. FALLAS: Hello, good morning.
10 Well, I remember a boss of mine used to ask me a
11 question quite often. He said, what keeps you up
12 at night every day? And when looking at the
13 organic production in Costa Rica, and basically
14 with all these questions that you have had, the
15 big issues for me are ethylene and the fraud.

16 But I'm going to concentrate on the
17 ethylene issue. If this multi-sectoral
18 consultation team decides to get ethylene out of
19 the official products that can be used in
20 organics, there are four things that are going to
21 happen.

22 The first is that the sustainable

1 livelihoods of many people that I know are going
2 to be over. They cannot reinvent themselves.

3 The second is that there's no
4 possibility of them substituting their work in
5 their farms for other products that are going to
6 provide them with enough money to buy their food
7 and to sustain their families.

8 The third is that there are going to
9 be many workers that are going to be laid off.

10 And the fourth is that the consumer in
11 the United States, without the use of ethylene,
12 is not going to be only affected with pineapple
13 but eventually it will be affecting also bananas,
14 avocados, and other products and vegetables.

15 Well, when assessing the proposal, you
16 know, we have looked at the very fine details and
17 the concepts, and every word that has been put
18 forward. And I have not seen any proposal yet
19 that takes in consideration the people, you know.

20 And from a modern, deliberate,
21 republic policy making, one of the things that we
22 have to begin is to think about the people. And

1 I have not seen that yet. So I think that that
2 is missing for me.

3 I represent right now CANAPEP, that is
4 the most important chamber of exporters of
5 products of Costa Rica. And we are very
6 concerned to see this. In this chart you will
7 see how many growers do we have, but only three
8 percent of all the area is organic. And that
9 will be gone without ethylene.

10 From our perspective, what we need to
11 do is work together as a team and try to
12 collaborate and look for -- to address both of
13 the issues, the ethylene in this particular case,
14 but also work together to avoid the fraud so we
15 don't see any in Costa Rica.

16 As my friend Oscar said, there's a
17 Congressional report from an investigative report
18 that took many months of work to address this
19 issue of the fraud. And we have names and people
20 involved in this issue. And we want consequences
21 with this. Thank you very much. Any questions?

22 MR. CHAPMAN: Dave?

1 MR. MORTENSEN: Olman, I can assure
2 you we are thinking of the people also. But
3 thank you --

4 MR. FALLAS: Thank you.

5 MR. MORTENSEN: -- for highlighting
6 that.

7 MR. FALLAS: Thank you, Mr. Mortensen.
8 That gives it a lot of focus.

9 MR. MORTENSEN: I'm curious that you
10 prefaced your statement by saying there are
11 things that keep you up awake at night about
12 organic production of pineapple, and it's not
13 ethylene. Could you tell us what those things
14 are?

15 MR. FALLAS: The two things that I
16 mentioned, probably I didn't express myself as
17 clear as I wanted, but the two things that keep
18 me up at night is the elimination of ethylene,
19 because of the impact it has, you know, and the
20 other is the fraud.

21 MR. MORTENSEN: Okay, thank you.

22 MR. FALLAS: All right, sir.

1 MR. MORTENSEN: Thank you for that
2 clarification.

3 MR. CHAPMAN: Dan?

4 DR. SEITZ: Can you give us a little
5 information on the ways in which fraud is carried
6 out in the pineapple industry?

7 MR. FALLAS: Well, fraud -- there's
8 always -- when you have the stimulus of earning
9 good money without working, there's always going
10 to be people that are going to try to play -- to
11 outsmart and outfox the system.

12 And the system cannot work without
13 three things, basically. We have analyzed this
14 very, very thoroughly. And the Congress of Costa
15 Rica has identified how it works. You have
16 corrupt public servants, you have corrupt
17 certifiers, and you have corrupt growers. You
18 cannot do a fraud without these three components
19 getting aligned together and working under the
20 same, you know, type of tune, basically to
21 simplify it.

22 MR. CHAPMAN: Emily?

1 MS. OAKLEY: I wanted to address your
2 concern that people are not a part of the
3 decision making, because I think they absolutely
4 are.

5 When we discussed this in the spring,
6 a lot of public comments came in about this
7 material saying that, you know, if it were
8 applied for now there really isn't a criteria
9 under OFFA that allows for just commercial
10 viability of a crop, for fruiting so that it's
11 easy to harvest.

12 I think it's the people that have
13 spoken widely to the members on the Board and
14 that give us consideration in our deliberations.
15 So definitely we are thinking of the farmers.

16 MR. FALLAS: Thank you, Emily. I
17 appreciate your comment.

18 MR. CHAPMAN: Asa?

19 MR. BRADMAN: I just have a comment
20 here. I work with a group looking at pesticide
21 exposures to agricultural workers in Costa Rica.
22 And we have seen higher exposures compared to US

1 populations for many conventional pesticides. So
2 I also see a benefit to people in Costa Rica with
3 expansion of organic production of any number of
4 crops.

5 MR. FALLAS: Yeah. I think that there
6 is a trend. I mean, I believe that when you look
7 at what's going on in the world with a more
8 informed consumer, we will continue to see people
9 more -- looking at the labels and looking at what
10 we are doing about it. So we really need to get
11 our act together.

12 Here the regulator is always in the
13 markets. Because look, Costa Rica is a small
14 country. We know each other very well, you know.
15 So we know who is who. So when somebody pops up
16 like a miracle pineapple grower, that Ms. Emily
17 Oakley already mentioned, where does it come
18 from? We know where it comes from. And the
19 Congress knows, and the police as well. So we
20 need to really address these issues thoroughly
21 and decisively, you know.

22 But again, for example, my friend

1 Christian Herrera worked for many years in the
2 conventional. So we have to take all the
3 agrochemicals and everything out of his truck.
4 And now he's an organic guy, you know.

5 So he can answer to you, Mr. Bradman,
6 exactly what it meant for him to come from a
7 conventional grower for many years -- that was
8 the one who started pineapple in Costa Rica -- to
9 becoming an organic advocate right now, okay. So
10 the tide is turning, I think, in one way or
11 another.

12 MR. CHAPMAN: Thank you.

13 MR. FALLAS: All right.

14 MR. CHAPMAN: Thank you for your
15 comments.

16 MR. FALLAS: Thank you very much, Mr.
17 Chapman. Enjoy having you.

18 MR. CHAPMAN: Up next is Wendy Jimenez
19 followed by Emily Musgrave. Wendy, you can start
20 with your name and affiliation.

21 MS. JIMENEZ: Thank you, good morning.
22 My name is Wendy Jimenez, and I work for CAPA

1 Costa Rica which is a branch of Central American
2 Produce Association here in Portland, Oregon.
3 And yes, it is very cold.

4 CAPA Costa Rica has been exporting
5 organic pineapples for 12 years. Since 2006, we
6 started our organic pineapple exports for the
7 American market by organizing a group of small
8 farmers who make a tremendous effort to grow
9 organic pineapples compliant with costly organic
10 certifications, including the USDA NOP, a
11 tremendous effort considering the drastic
12 climatic conditions in the humid tropics of Costa
13 Rica.

14 Currently, this organic program
15 represents 20 percent of our sales to the United
16 States. Costa Rica exports approximately \$900
17 million per year. Of this amount, \$21 million
18 responds to sales of organic pineapple. This can
19 only mean that these sales respond to smaller
20 producers.

21 The demand for organic pineapple
22 requires programming throughout the whole year.

1 Every client must request the fruit that they are
2 interested in buying at least five months before
3 the harvest period.

4 An organic pineapple farmer does not
5 plant and grow just to look for markets later on.
6 They grow organic fruit with a previously
7 established commitment to provide that pineapple
8 to a customer or a processor within a defined
9 period and with a settled volume.

10 Farmers must use ethylene. It is
11 naturally generated and used in a process that is
12 only to activate a floral induction. And that
13 same product will never be used recurrently in
14 the development or commercialization of this
15 fruit. Without the use of ethylene, organic
16 pineapple cannot be produced, considering there
17 will be no controlled method of production.

18 Eventually, without organic pineapple
19 exports, a global supply chain could end. This
20 would obviously affect the United States, which
21 is the main consumer of organic pineapple in the
22 world. The use of ethylene is imperative for

1 organic products. Thank you very much.

2 MR. CHAPMAN: Thank you. Any
3 questions? Steve?

4 MR. ELA: I'm curious. We've heard
5 about the rotations with organic production.
6 What would a conventional grower do? Would they
7 come out of -- and pineapples -- would they come
8 out of pineapples? And then what would be their
9 practices before they replant?

10 MS. JIMENEZ: Before they go out
11 conventional?

12 MR. ELA: So in the conventional
13 pineapple system, is there that cover crop
14 rotation as well? Or do they finish one crop, go
15 immediately back into another crop? And I guess,
16 what are the differences between the organic
17 rotation and the conventional rotation?

18 MS. JIMENEZ: Well, that is actually a
19 very technical question. And that should be
20 addressed to my teammates over there. But
21 obviously, I think we should explain very well
22 that, if you go from conventional to organic, you

1 have to wait a lot of time. But like I said,
2 this is a very technical issue, and I'm not
3 really the person to discuss it.

4 MR. CHAPMAN: Thank you.

5 MS. JIMENEZ: Thank you.

6 MR. CHAPMAN: Up next is Emily
7 Musgrave, followed by Arturo Solorzano Arroyo.
8 Emily, you can start with your name and
9 affiliation.

10 MS. MUSGRAVE: Good morning. My name
11 is Emily Musgrave. I'm the organic program
12 manager at Driscoll's. I'd like to thank the
13 NOSB for their commitment to protect the
14 integrity the organic program and uphold the
15 vital regulatory processes of the NOP. Your work
16 is tremendous, and it does not go unnoticed.

17 Today, my comments focus on the
18 continued allowance of elemental sulfur,
19 sulfurous acid, and liquid fish products on the
20 national list.

21 Driscoll's supports the continued
22 listing of elemental sulfur for use in organic

1 production on the national list. Dusting sulfur
2 is a critical tool for organic strawberry growers
3 as a fungicide and miticide specifically used to
4 target powdery mildew, a fungal disease that
5 plagues organic strawberry growers.

6 Organic strawberry growers commonly
7 use both dusting sulfur and wettable sulfur in
8 rotation with each other. Growers have found the
9 two formulations show different efficacies, and
10 rotating the products limits plant stress and
11 reduces the risk of phytotoxicity.

12 Our growers do not believe the sole
13 use of wettable sulfur is a viable alternative to
14 dusting sulfur. Dusting sulfur gets more
15 thorough coverage than wettable sulfur and
16 penetrates deeper into the strawberry crown.

17 We would like to reiterate that
18 removing elemental sulfur from the national list
19 would cause significant challenges to organic
20 growers and damages to crops from powdery mildew.

21 That being said, Driscoll's is
22 continuously researching other viable methods

1 other than dusting sulfur for the control of
2 powdery mildew, including efficacy tests of
3 specific strains and application methods of bio
4 control agents.

5 Driscoll's supports the continued
6 listing of sulfurous acid on the national list.
7 It is an important practice for controlling and
8 adjusting the pH in irrigation water across all
9 berry types. Sulfurous acid has proved to be the
10 most effective method of soil acidification after
11 soil preparation is completed. Balanced soil pH
12 is essential for ensuring proper nutrient uptake,
13 microbe activity, and plant health.

14 Driscoll's supports the continued use
15 of liquid fish products for use in organic
16 production, as it is a critical source of
17 fertility across all berry types. The vast
18 majority of our growers use liquid fish products
19 as it is a key nitrogen supplement for long-term
20 perennial crops. We do encourage the Board's
21 continued research regarding the sustainable
22 sourcing of fish for these fertilizers.

1 I thank the National Organic Standards
2 Board for you service and for consideration of my
3 comments.

4 MR. CHAPMAN: Thank you. Emily?

5 MS. OAKLEY: This is a little off-
6 topic, but do you guys use aquatic plant extracts
7 or seaweed, kelp products? And do you support or
8 have an opinion on addressing the environmental
9 impact of those harvests as well?

10 MS. MUSGRAVE: Yeah, that's a great
11 question. A lot of our growers do use quite a
12 few different algae and those types of marine
13 products. And I think I agree with some of the
14 other certifiers that have commented that it
15 would just be getting the regulation right,
16 there. So I think if certifiers came out and
17 found a way to do it, I think our growers would
18 support it, and Driscoll's would support it.
19 Thank you.

20 MR. CHAPMAN: Asa?

21 MR. BRADMAN: Hello. Would you
22 explain the dust, sulfur dust application

1 methods, and the kind of equipment that's used?

2 MS. MUSGRAVE: Yeah. That's a good
3 question. So it's really specialized equipment
4 for dusting sulfur, rather than wetttable sulfur,
5 which is actually one of the reasons why we're
6 doing research on other, you know, biopesticides,
7 because it's very expensive.

8 The machines range, I think, from
9 anywhere to, like, \$12,000 to \$15,000. And
10 they're specifically only used for dusting
11 sulfur. So that could be prohibitive to some
12 growers if they're not able to get that cost. So
13 it's a very specific machinery used.

14 And that's why we're looking at things
15 such as BT and other biopesticides. But we're
16 still in the very early stages. It's not ready
17 for commercial development yet. But yes, the --
18 what's used for dusting sulfur is really specific
19 for that crop for strawberry growers.

20 MR. BRADMAN: Could you explain the
21 equipment a little bit? Like, how is the
22 material applied, and is there any attempt to

1 direct the application, what level, that kind of
2 thing?

3 MS. MUSGRAVE: Yeah. That's a little
4 bit beyond, kind of beyond my scope. I do know a
5 little bit about it. I mean, right, there's a
6 few different -- so you've got your dusting
7 sulfur which, you know, is used as a powder and
8 gets better coverage. And then you've got your
9 wettable sulfur, and then the micronized sulfur
10 that goes into the sulfur burner.

11 I don't know the specifics exactly
12 regarding how, you know, growers are using it in
13 the machines. But I do know that they follow
14 lots of, you know, they're looking at wind
15 patterns, and weather, and there's protective
16 gear. So they do follow that.

17 I do know that dusting sulfur can be a
18 little bit hard on the plants also, you know.
19 It's a little bit harsh on the plant which is
20 another reason, you know, why it's an important
21 tool. And without it, powdery mildew would be a
22 big issue. But that's another reason why we're

1 looking into alternatives.

2 But that's a good question, Asa. I
3 could get back to you on the specifics with my
4 colleagues. Thank you.

5 MR. CHAPMAN: Dave?

6 MR. MORTENSEN: Yeah. And I think
7 that the subcommittee was focusing more on it, or
8 at least there was a lot of discussion about
9 human exposure by former field workers. So maybe
10 less on the plant reaction and more on human
11 exposure.

12 MS. MUSGRAVE: Human exposure,
13 exactly. Thank you.

14 MR. CHAPMAN: I have a question about
15 -- we have a petition before us on silver
16 dihydrogen citrate that could be used as an anti-
17 microbial wash on fruits and vegetables. Does
18 Driscoll's have a thought or a position on this
19 material?

20 MS. MUSGRAVE: That's a good question.
21 I don't think we have currently looked into it.
22 But if that could be something that we could look

1 into on the open docket, we'd be happy to comment
2 on that.

3 MR. CHAPMAN: Yeah. I mean, we
4 received maybe three comments from the organic
5 industry or so. And so I was just looking to see
6 if there was further feedback from other handlers
7 that would potentially be using this product if
8 it was a need or a necessity for them.

9 MS. MUSGRAVE: Yeah. I can definitely
10 look into that and get back to you. Thank you.

11 MR. CHAPMAN: Thank you.

12 Up next is Arturo, and then we'll
13 break after that. After break will be Melody
14 Morrell.

15 MR. SOLORZANO: Good morning. My name
16 is Arturo Solorzano. My thanks to the Board for
17 giving us this opportunity to interact with the
18 US and NOSB. I'm the national director of the
19 Agricultural National Research Institute. I'm
20 also a representative of the Ministry of
21 Agriculture of Costa Rica.

22 On behalf of the government of Costa

1 Rica, we ask for the NOP to authorize the use of
2 ethylene as an input for organic production of
3 pineapple for over five years due to the lack of
4 other inputs, commercial available for the
5 organic production.

6 Change or modifications in inputs will
7 impact directly on farmers due to the more than
8 90 percent of commercial organic pineapple is
9 exported to the US directly from Costa Rica.

10 Ethylene is a viable gas -- is a
11 viable material that can meet the needs of all
12 sizes of organic farms, not only in Costa Rica
13 but also in a lot of Central American countries.

14 So without ethylene, it would be
15 impossible to achieve the uniform ripening
16 necessary for timely harvest of the fruit
17 treatment.

18 Also, I want to mention that climate
19 change in the last year has increased a lot with
20 the effect to development of natural flowering
21 that happens a lot. This way, development of
22 climate change is making a lot of -- a huge

1 amount of undesirable fruits with not uniformity
2 at all.

3 Because we have fruits from ripened
4 fruits and ripening fruit at the same time. Then
5 these temperatures, cold temperatures will allow
6 the production of natural flowering and natural
7 fruits. With these natural fruits, then we will
8 have pests all over at different times.

9 And as you can see, we can have, in
10 the picture over there, the small fruits, green
11 fruit, unripened then, and then we will have
12 pests all over them. And because of the
13 management from all these kind of pests will be
14 for different strategical management for the
15 farmers.

16 Because the small fruits will bring
17 another pest. So the farmers cannot really match
18 the technical process that they use to control
19 one mold or one larvae at the different size of
20 fruits. It's not only a matter of making easy to
21 crop the final process but also to manage the
22 pest development in the production. So with

1 ethylene really, the farmers will not really have
2 a method of developing of the pests.

3 There's a different pest now can also
4 be evolving there. Also thank you. We are
5 really in the tropical part of the country. So
6 we are really in process of how to manage with
7 the environmental condition. We will really put
8 all our efforts and means in agriculture to help
9 the farmers to develop.

10 MR. CHAPMAN: Thank you, thank you.

11 Questions, Harriet?

12 MS. BEHAR: So just to summarize what
13 you -- just to summarize what you've said, that
14 when a field has different flowering times within
15 a pineapple field, so if ethylene is not being
16 used, that you'll have higher pest pressure
17 because the moths are attracted to the flowers.
18 And then the larvae from those moths will then
19 attack the less mature pineapple. And you'll
20 have significant losses. Is that what I'm
21 understanding?

22 MR. SOLORZANO: You just summarized it

1 just perfectly, certainly. We would have fruits
2 of different sizes, of different amounts. Then
3 it keeps attracting a different pest. So you can
4 imagine the different strategical management. So
5 it's a food safety issue as well, because the
6 farmer has to get into the fields many times, as
7 other speakers already mentioned.

8 MS. BEHAR: So then the reason for the
9 use of ethylene is not just for getting the
10 pineapple to market but also as an important pest
11 control material by having uniform flowering.

12 MR. SOLORZANO: Uniform fruit
13 development. Yes.

14 MR. CHAPMAN: Emily then Ashley.

15 MS. OAKLEY: I just wanted to let
16 people know that there are more comments to that
17 effect for the pest and disease control and the
18 Organic Produce Wholesaler Coalition's comments.
19 So if people want to see more about that, it's
20 there.

21 MR. CHAPMAN: Ashley?

22 MS. SWAFFAR: I just want to say thank

1 you to all the growers from Costa Rica that came.
2 Because that's a huge effort that you guys made
3 to come here and give us your comments. And we
4 really appreciate that you guys came. Thank you.

5 (Applause.)

6 MR. SOLORZANO: Thanks to all of you.
7 I appreciate all your help on this issue.

8 MR. CHAPMAN: Thank you very much.
9 Okay, by my clock, which is on Pacific time, so
10 by my other clock, it's 10:23. Let's take a 22
11 minute break and come back promptly at 10:45.
12 We're in recess.

13 First up when we come back is Melody
14 Morrell and on deck is Stephen Walker.

15 (Whereupon, the above-entitled matter
16 went off the record at 10:23 a.m. and resumed at
17 10:50 a.m.)

18 MR. CHAPMAN: Okay. So I see all
19 Board members present, so we'll get started. And
20 I just need to find my spot. Melody, so we'll
21 start with Melody Morrell followed by Stephen
22 Walker. Melody, if you can start with your name

1 and affiliation for the record.

2 MS. MORRELL: Sure. My name is Melody
3 Morrell. I work at the Cornucopia Institute. I
4 have studied shipping logs as I followed the
5 importation of organic corn and soy from suspect
6 countries. I've seen who's consignee, shipper,
7 and notified party are all listed as FedEx. No
8 transparency.

9 Cheap, often fake organic feed is
10 propping up organic factory farm operations and
11 is spread over the marketplace. Cheap feed means
12 cheaper meat, milk, and eggs. These are now
13 conventional products sold at depressed organic
14 prices.

15 Your continued attention to tracking
16 organic products through the entire supply chain
17 is critical to the integrity of the program and
18 consumer trust. I'm so glad to hear about your
19 current efforts and hope the NOP can move very
20 quickly.

21 The natural evolution of organic
22 farming is subverted when regulations are bent to

1 fit the conventional model. Rather than leaving
2 room for the improvement of organic practices, we
3 are ushering in a kinder, gentler, conventional
4 agriculture.

5 Real organic farmers are being forced
6 out of business. Organic farmers who grow
7 produce in soil now compete with hydroponic
8 factories using organic inputs. Even during
9 tomato season, organic hydroponic tomatoes
10 dominate my rural Minnesota grocery store and our
11 local organic buying club. They are cheap,
12 sometimes even matching conventional prices.

13 Hydroponic operations require an
14 enormous amount of energy-expensive
15 infrastructure and do nothing to improve or
16 maintain the soil as OFFA directs.

17 In 2010, the Board determined that
18 they cannot be certified organic, but here we
19 are. This spring, the European Union revised its
20 organic standards to prohibit hydroponic
21 production under their organic label. The EU
22 will no longer import produce labeled organic if

1 it was grown hydroponically beginning in 2021.

2 I emailed the pertinent parts of that
3 new regulation, if you haven't seen it yet. It
4 includes a clear definition of organic soil-bound
5 production. It is unclear what it will mean for
6 the US/EU organic equivalency arrangement when
7 our labels do not mean the same thing. Factory
8 farm and hydroponic products dominate the market
9 in part because they have been allowed to bear a
10 seal that they have not earned.

11 Thank you for you continuing and very
12 complicated efforts to protect a true marketplace
13 alternative. And thanks especially to Jennifer
14 Tucker for her efforts on improved transparency
15 at the NOP. It's much appreciated.

16 MR. CHAPMAN: Questions?

17 (No audible response.)

18 MR. CHAPMAN: Thank you very much. Up
19 next is Stephen Walker followed by Michael Menes.
20 And if you could start with your name and
21 affiliation.

22 MR. WALKER: Good morning, I'm Steve

1 Walker, Operations Manager at MOSA. We certify
2 2,100 organic operations, and most of those are
3 here in the upper Midwest, a veritable GMO hot
4 zone.

5 Most of the certified operations
6 include 1,400 corn growers plus lots of beans,
7 alfalfa, and other at risk crops. We review many
8 GMO contamination prevention plans, and we
9 investigate GMO contamination cases.

10 At previous meetings, we expressed our
11 frustration when reasonable prevention plans
12 proved ineffective, and I said something about
13 probably having GMO dust on my eyelashes. And we
14 talked about some math, including the ridiculous
15 amounts of buffer required to truly protect
16 genetic integrity on an average seed corn field.
17 And yet we still strive to promote that organic
18 means non-GMO. So we're thankful to see further
19 progress toward a fair regulatory approach.

20 We support the general direction and
21 the sound concepts in the proposal, but even with
22 the urgency of this growing issue, we think the

1 proposal still needs some refinement and clarity.
2 We have some concerns around sensibly sharing
3 burdens within the organic community,
4 practicality of enforcement, and unfair impacts
5 on geographic regions with more GMO production.

6 We also think the proposal should
7 emphatically call for USDA support in order for
8 coexistence to be successful. We organic folks
9 are doing our fair share. Maybe there's a bit
10 more we can do, and that's why the concepts in
11 this proposal are important.

12 But there's only so much each of us
13 can do in the face of increasing contamination
14 threats. And yet, the public expects our organic
15 economic engine to be GMO-free.

16 There are remaining moral questions of
17 fairness and responsibility. We won't meet
18 consumers' organic purity expectations unless we
19 have more support and leadership from the USDA
20 and not just the National Organic Program. Lack
21 thereof makes for failed coexistence, and that
22 harms our organic label.

1 The proposal does a good job of
2 explaining the necessity for genetic integrity
3 transparency and sets a reasonable forward
4 course. But this path also continues our
5 defensive position with disappointing
6 acquiescence towards contamination. We'd like to
7 see a little more call to arms.

8 We appreciate the proposal's
9 perspective on financial losses from genetic
10 contamination, a problem that conventional US
11 agriculture created for itself.

12 We find the 17 points to be thorough,
13 but hard to follow. We'd like more clarity on
14 responsibilities, perhaps organized by
15 stakeholder, including certifiers, labs,
16 inspectors, NOP, organic and conventional seed
17 suppliers and growers.

18 And looking down the path a bit, we
19 wonder if transparency of test results will
20 create a geographic disadvantage for growers and
21 seed suppliers in places that have more
22 contamination from GMO production like here in

1 Minnesota. And then our written comments get
2 into a lot more details about various points in
3 the proposal.

4 MR. CHAPMAN: Thank you.

5 MR. WALKER: Okay.

6 MR. CHAPMAN: Harriet?

7 MS. BEHAR: Can you speak a little bit
8 more about the practicality issue, which specific
9 parts of the proposal you felt were impractical
10 for implementation?

11 MR. WALKER: I guess for that I'd
12 refer to our written comments. It's fairly well
13 outlined in here, and I didn't memorize point by
14 point of the 17, but we did comment on, you know,
15 not every single point, but some are little
16 practicality things, who's responsible. There's
17 a couple language things in there that maybe
18 needed more clarification.

19 MR. CHAPMAN: Dan, then Harriet.

20 DR. SEITZ: If this were posted on the
21 open docket, would your organization be willing
22 to actually put in suggested wordings, and

1 changes, and so forth? From our standpoint, if
2 people actually give us wording that they think
3 works better, it makes our task easier.

4 MR. WALKER: Yeah, I think we could
5 take a stab at that. We didn't do that for this
6 written comment, but on the other 5029 seed one,
7 we did quite a bit of that sort of suggested
8 wordsmithing.

9 MR. CHAPMAN: Harriet?

10 MS. BEHAR: Would you rather that it
11 had been a tolerance level rather than the
12 transparency allowance? You kind of alluded to
13 that we needed a stronger stance on this.

14 MR. WALKER: No. I think transparency
15 is a good way to go. And if you get into set
16 levels, then you're -- that's contrary to, I
17 think, what NOSB said your intentions were. And
18 that comes across more in our comments on the
19 other seed issue at hand.

20 MR. CHAPMAN: Thank you.

21 MR. WALKER: Okay, yeah. Thanks for
22 all your work very much.

1 MR. CHAPMAN: Up next is Michael
2 followed by Sandra Mays. Michael, start with
3 your name and affiliation.

4 MR. MENES: Good morning, Mike Menes,
5 True Organic Products. Thank you for the
6 opportunity to comment. Thank you to the NOSB
7 and the NOP for all the stuff that you do for the
8 organic industry. We appreciate your attention
9 to detail as we wade through the many -- as you
10 wade through the many comments on the issues.

11 I can tell you a little bit about our
12 company. True Organic Products is the nation's
13 largest organic fertilizer manufacturer. We're
14 family-owned, and we've been doing this since
15 2005. We manufacture our liquid and pelleted
16 fertilizer in two locations, in Helm, California,
17 and out in Boardman, Oregon, on the eastern side
18 of the state. And this slide will show a few of
19 our growers that use our products.

20 I'm here again today to comment on the
21 tools for organic fertility. Accepted practices
22 of crop rotation, composting by diversity, are

1 well proven and have been successful. Organic
2 fertilizer manufacturers like ourselves fill the
3 need for situations where additional soil
4 fertility is needed to keep up with the growing
5 demand of organic produce.

6 It is important for international and
7 domestic growers to understand that these inputs
8 used in their farming practices contribute to the
9 overall organic integrity.

10 Today, I'll be updating you on
11 positions that I commented on at the spring NOSB
12 meeting earlier this year. Specifically this is
13 in regards to the support of liquid fish. Thank
14 you again for putting it on the work program.

15 True Organic Products is in support of
16 the work that's done for this and continues to
17 have interest in having that remain on the NOP's
18 approved materials list for use in organic
19 production.

20 There are a limited number of liquid
21 fertilizers that are available in organic
22 production. Sunsetting liquid fish would limit

1 the tools available for growing crop organically
2 and thus limiting the availability of things like
3 what you've heard today, organic berries,
4 certainly salads, almonds, apples, celery, and so
5 much more.

6 We support the work and the agenda to
7 answer the questions about the environmental
8 impact of fishing solely for fertilizer versus
9 byproducts of fishing for oil and fish meal.

10 Previously, we commented on the status
11 of sodium nitrate and its availability.
12 Anecdotally, we had understood widespread use,
13 particularly in crops in regions that require
14 nitrogen to be delivered to the plant very
15 quickly in a wide range of growing conditions.

16 Another time we shared results of
17 detectable levels of sodium perchlorate that was
18 limited to the retail market. Recently, we
19 obtained a sample that is available to farmers.
20 It was a 2,000-pound bulk bag. And we detected
21 33 parts per million of perchlorate in that which
22 is higher than the limit stated which is, I

1 think, six parts per billion or micrograms per
2 liter.

3 In closing, True Organics, again, is
4 in support of maintaining the NOP approved list
5 and re-listing of liquid fish. Please continue
6 to make progress on the prohibition of sodium
7 nitrate.

8 Additionally, we're in support of
9 systematically vetting the inputs for the -- make
10 sure that the intents and purposes of the OFPA
11 are met. Thank you.

12 MR. CHAPMAN: Thank you. Harriet?

13 MS. BEHAR: Would you be willing to
14 put in a petition for the prohibition of sodium
15 nitrate, placing it on 602?

16 MR. MENES: I had considered that as a
17 suggestion yesterday. I thought it was a good
18 suggestion and certainly will look into that.
19 And, yeah, I think that's certainly a possibility
20 for us to do.

21 MR. CHAPMAN: Rick?

22 DR. GREENWOOD: Question. So you had

1 one sample that had perchlorate. Have you tested
2 more than one sample? I mean, how pervasive is
3 it?

4 MR. MENES: Well, turns out that a
5 2,000-bulk bag is pretty expensive. And we can't
6 go around the nation to be able to find that. So
7 we looked for one locally and were able to
8 purchase one and then test that.

9 We have that in a chain of custody.
10 So it's certainly an issue on sampling. But
11 we're interested in finding out. Most of the
12 samples really were from retail, or online
13 retailer. But the one we wanted to make sure and
14 follow up at this meeting to find out if there is
15 something in there.

16 The retail ones where it's Chilean
17 nitrate at 1600, and it was part of my written
18 comment, we've got results there as high as 2,500
19 parts per million. And this one as low as 33 for
20 that big bulk sample but still very much higher
21 than the drinking water standard.

22 DR. GREENWOOD: All right, thank you.

1 MR. MENES: Thank you.

2 MR. CHAPMAN: Eric?

3 MR. SCHWARTZ: Did that sample trigger
4 any regulatory action?

5 MR. MENES: No. No, we took it for
6 ourselves to be able to present here. And we
7 didn't do anything with it. I'm sure there's
8 some mechanism in order to be able to do that,
9 but we haven't explored that.

10 MR. CHAPMAN: Thank you.

11 MR. MENES: Okay, thank you.

12 MR. CHAPMAN: Up next is Sandra Mays
13 followed by Kelly Monaghan.

14 MS. MAYS: Good morning. I'm Sandy
15 Mays. I represent Wolf, DiMatteo & Associates.
16 I'm a senior associate. And in this comment,
17 I'll cover the pullulan petition, seaweeds, and
18 inspector requirements, as well as unfinished
19 business that is holding organic back.

20 Wolf, DiMatteo & Associates has
21 clients in the dietary supplements sector that we
22 have assisted with organic compliance. Adding

1 pullulan to the national list as a non-
2 agricultural substance allowed for use in
3 products labeled made with organic, allows the
4 existing market established before the
5 reclassification of pullulan to continue, and
6 brings the substance under the review by the NOSB
7 and the national list sunset process.

8 We are aware that there is research
9 and development underway to produce certified
10 organic pullulan, but there is not a commercially
11 available supply at this time. We anticipate
12 that when an organic pullulan capsule is
13 available that supplement companies will eagerly
14 respond.

15 We have international clients that
16 harvest certified organic seaweeds and kelps.
17 I've observed their work many times and found
18 that extreme care is taken in order to ensure a
19 sustainable harvest.

20 If or when a working group does come
21 into play, we strongly encourage that it include
22 international operators so that the NOSB can

1 obtain a more worldly look at the differing rates
2 of seaweed growth, harvesting styles, and
3 sustainability measures put into place to protect
4 their natural resources.

5 As for inspector requirements, IOIA
6 and ACA organizations are the experts regarding
7 what is happening on the ground with inspectors
8 as well as what is needed to strengthen their
9 performance and ensure that the NOP standards are
10 being upheld. We ask that you give priority
11 consideration to the comments of the IOIA and the
12 ACA.

13 We've submitted comments on some of
14 these topics for years, all unfinished important
15 business, a few listed here on this slide, inert
16 sodium nitrate, mulch film, and requiring organic
17 when available. Our comments are rooted in a
18 philosophy of continuous improvement that organic
19 is seeking the gentlest ways to produce better
20 food and fiber.

21 So we ask, don't shrink the national
22 list tool box as a goal in and of itself. We

1 need choices, not just one solution for every
2 problem. Be open to innovation and creativity
3 that fits the organic philosophy. The
4 precautionary principle cuts both ways. Thank
5 you so much.

6 MR. CHAPMAN: Thank you. Emily?

7 MS. OAKLEY: I'm not asking any
8 questions, just a comment that I want to echo
9 that I couldn't agree more with you that a
10 working group should include international
11 operators as well. Because that's a missing link
12 right now in the comments. So thank you.

13 MS. MAYS: Absolutely.

14 MR. CHAPMAN: Thank you.

15 MS. MAYS: Thank you.

16 MR. CHAPMAN: Up next is Kelly
17 followed by Rebekah Ritson.

18 MS. MONAGHAN: My name is Kelly
19 Monaghan. I'm an IOIA accredited organic process
20 inspector, trainer, and consultant. I'm
21 commenting on behalf of IOIA, the International
22 Organic Inspectors Association.

1 IOIA is a non-profit educational
2 organization with a global membership of organic
3 inspectors and certifiers. IOIA provides quality
4 inspector and reviewer training and promotes
5 consistency and integrity in the organic
6 certification process.

7 Thank you for the opportunity to
8 provide comments today and for incorporating
9 comments received at the last NOSB meeting on
10 this topic.

11 Inspectors play a critical role in
12 ensuring organic integrity. IOIA is especially
13 pleased to see that your proposal focuses equally
14 on inspectors and on reviewers who handle organic
15 files.

16 The global organic movement recently
17 created Organic 3.0 to guide the industry into
18 the future. IFOAM's description of one key
19 element of this strategy focuses on progressive
20 improvement toward best practice. This captures
21 well IOIA's opinion on this topic.

22 What is needed is not a one-time

1 improvement but a structure that allows and
2 supports all players to continually improve their
3 skills and abilities.

4 IOIA applauds the list of topics for
5 skill development outlined in your proposal,
6 particularly the requirement for operators to
7 provide a sample audit in their organic system
8 plan, continuing education, especially if it were
9 level appropriate education, categorization of
10 inspection by scope and skills -- the NOP could
11 incentivize certifiers to this end -- team
12 inspections, an underutilized tool, and import
13 protocols, a great topic for the USDA's learning
14 management system.

15 IOIA recommends adding fraud
16 detection, forensic investigation, and risk-based
17 criteria for audit selection.

18 IOIA supports all forms of mentoring.
19 However, facilitation of an
20 apprenticeship/mentor, peer mentor program is not
21 an appropriate role for the USDA. The third
22 party system of training already in place, using

1 IOIA certifiers and the ACA, can serve as the
2 foundation for such a program.

3 IOIA is an expert voice in the
4 development of curriculum and testing protocols
5 and looks forward to working collaboratively with
6 certifiers, the ACA, and the NOP to design and
7 continue to improve an effective standardized
8 system.

9 In closing, IOIA knows that
10 qualifications, training, and continuing
11 education are all important for inspectors and
12 reviewers. But those factors alone do not
13 guarantee a good inspection. Well trained and
14 qualified inspectors can do a poor job without
15 good forms, adequate time, or appropriate
16 compensation.

17 Competence should be outcome-based and
18 not simply measured by having the appropriate
19 qualifications and training. Any proposal should
20 incorporate these elements so that a professional
21 inspector is well-prepared and supported to
22 conduct efficient, rigorous inspections and find

1 fraud if it exists.

2 IOIA remains ready, willing and able
3 to assist in continuing to build on the strengths
4 of the existing organic inspection system.

5 Thank you again for the opportunity to
6 comment and for your hard work on behalf of the
7 sector.

8 MR. CHAPMAN: Thank you. Questions?
9 Harriet?

10 MS. BEHAR: Hi, Kelly. I'm just kind
11 of wondering, part of this document was to
12 encourage more consistency. I know there's many
13 trainings of various certifiers in-house, and
14 IOIA does trainings.

15 But not everyone is trained to the
16 same level, to the same quality, and we all know
17 one inspector, it's a very unique position, has
18 different -- So I'm just wondering, when you were
19 saying it doesn't belong with the NOP, can the
20 NOSB and the NOP play a role in encouraging
21 consistency?

22 MS. MONAGHAN: Thank you, Harriet. I

1 absolutely think that they can. I think what
2 IOIA wanted to say there is just the way that the
3 USDA in 2002 didn't sort of reinvent the wheel by
4 taking over the existing third party system.

5 We just want to re-emphasize, I think,
6 that there are structures in place within the
7 ACA, within certain certifiers, and certainly the
8 IOIA, that can provide a good foundational
9 building block for a type of standardized system.

10 I think Jenny's comments yesterday
11 regarding the ACA survey that happened this week
12 or this summer, and I believe you have the
13 summaries, will provide all of you with a really
14 good indication of some of the disparity and the
15 importance for standardization. And IOIA
16 absolutely supports that.

17 MR. CHAPMAN: Scott?

18 MR. RICE: Just a quick comment
19 reiterating that I think the goal is to reduce
20 that or not have that redundancy of reinventing
21 the wheel. And I understand that the NOP and
22 IOIA have had some good discussions to see where

1 the program can fill in those gaps, and have a
2 role, and not supplant the good work that you
3 guys have already done.

4 MS. MONAGHAN: Thank you.

5 MR. CHAPMAN: Dave?

6 MR. MORTENSEN: This is an area that
7 I'm less familiar with, how this works on the
8 ground. But I was interested, from the farmers
9 from Costa Rica that we're discussing, how in a
10 bad case, music is made when you have a farmer,
11 an inspector, and an exporter that are working
12 together to work around organic regulations.

13 I don't know if you were hearing that
14 earlier. But his point was, which I thought was
15 very interesting, that having a community of
16 farmers police the farmer to inspector
17 interaction in a local region was a very
18 effective way of keeping things on the up and up
19 with regard to fraud in a local area.

20 Do you know, is that a common
21 occurrence, that farmers in a community, whether
22 it be in Croatia or in Costa Rica, are working

1 together to ensure that the local process on the
2 ground in the country is actually working
3 effectively?

4 MS. MONAGHAN: I'm afraid I don't
5 personally know that, Dave. But notwithstanding
6 the fact that I'm standing here, I will ensure
7 that IOIA can provide a written response to that
8 question.

9 I know that IOIA absolutely supports
10 peer mentoring, field inspections, group
11 inspections, and increasingly does that in order
12 to, you know, raise the bar for the
13 qualifications of the inspectors and help each
14 other grow in groups and region.

15 MR. CHAPMAN: Thank you.

16 MS. MONAGHAN: Thank you again.

17 MR. CHAPMAN: Up next is Rebekah
18 Ritson followed by David Hiltz. Rebekah, if you
19 can start with your name and affiliation.

20 MS. RITSON: Good morning. I'm
21 Rebekah Ritson, Organic Regulatory specialist for
22 Grain Millers. Thank you for the opportunity to

1 provide oral comment today.

2 Grain Millers is a whole food
3 ingredient manufacturer and merchandiser
4 headquartered in Eden Prairie, Minnesota. We
5 have been involved in organic food production for
6 more than 30 years.

7 We appreciate the hard work and
8 dedication of the NOSB and would like to offer
9 comment on two of the proposals from the
10 Compliance Accreditation and Certification
11 Subcommittee that we feel will lead to positive
12 change and improved organic integrity industry
13 wide.

14 Regarding the proposal for developing
15 criteria for risk-based accreditation oversight,
16 we are eager to see this proposal move forward.
17 Ensuring all certifiers are held to a high
18 standard and provide consistent oversight of
19 their certified operations is critical to the
20 organic industry's reputation and personally to
21 our business.

22 Right now, the proposal is somewhat

1 unclear on how the identification of inspectors
2 would impact the frequency and/or length of
3 accreditation audits for certifiers.

4 We do want to voice our support of
5 more frequent audits for certifiers identified as
6 high risk and echo the Organic Trade
7 Association's call for additional development of
8 the identified risk factors via matrix or other
9 risk assessment tool.

10 In addition to the excellent list of
11 risk factors that you've already identified in
12 the proposal, we would suggest that significant
13 changes in the number of certified operations
14 overseen should be included as an indicator of
15 risk.

16 And what I mean by that is substantial
17 increases in a certified operation just in a
18 given year or a couple of years without
19 appropriate staffing adjustments, restructuring,
20 or other changes to operational management, can
21 result in overextended staff with detrimental
22 impacts on quality inspection reviews and, just

1 frankly, possible noncompliances being missed.

2 Substantial decreases in certified
3 operations is also an indicator, because it could
4 be due to service, timeliness, or other issues
5 that are pervasive throughout the certification
6 agency.

7 We also strongly support the inclusion
8 of Factor Number 8 on incomplete or minimum data
9 reporting as a risk factor. We would ask that
10 you expand upon that factor to encompass other
11 data quality measures such as frequency of
12 updates, duplicative entries, and other data
13 quality measures that I'm sure are available when
14 determining risk associated with Organic
15 Integrity Database reporting.

16 Regarding the training and oversight
17 of inspector and certification review personnel,
18 we wholeheartedly support the standardized
19 curriculum for all organic inspectors, including
20 scored online trainings to establish a minimum
21 baseline of inspector knowledge and skills.

22 In particular, we would ask that this

1 training include more comprehensive audit trail
2 exercise training. Mass balance audits, and
3 really all audits, are an area where great
4 improvements need to be made.

5 We would also encourage advanced
6 trainings in forensic accounting, evidence
7 development, sample collection, and traceback
8 investigations as a requirement for all
9 inspectors that conduct unannounced inspections,
10 as these are often a major component of
11 investigation into fraud or persistent regulatory
12 compliance problems.

13 Finally, we recognize the value of
14 inspector pairs or teams for highly complex or
15 very large operations and would like to voice our
16 support for the implementation of this practice
17 as soon as possible, as it would likely increase
18 the efficacy and quality of inspections for these
19 types of operations. Thank you.

20 MR. CHAPMAN: Thank you. Harriet?

21 MS. BEHAR: As a buyer of grain, do
22 you ever require a certain type of seed of your

1 growers? And is that seed always organic?

2 MS. RITSON: I think that may tie back
3 to the written comments that we submitted. I am
4 not the best person to answer that question, but
5 I will do my best.

6 Particularly for our organic soybeans,
7 we do have buyers in Japan that are looking for
8 really specific characteristics and traits. And
9 so we do contract with our growers to produce the
10 seed that has those traits. We do our best to
11 source organically, but some years that's well
12 below 50 percent. And in talking it over with
13 our crop specialists, the best they've ever been
14 able to do is about 60 percent.

15 MR. CHAPMAN: Thank you very much. Up
16 next is David Hiltz followed by Trudy Bialic.

17 MR. HILTZ: Good morning, and thank
18 you very much. I'm David Hiltz. I'm a
19 regulatory scientist with Acadian Seaplants.
20 We're a marine plant company from Nova Scotia,
21 Canada.

22 I want to offer thanks to the NOP and

1 the NOSB staff for all of their past and ongoing
2 work. We appreciate the opportunity to provide
3 input on marine materials which is a subject that
4 we have commented on many times, beginning at the
5 2003 meeting in Austin.

6 Acadian appreciates the ongoing
7 efforts of the Board to ensure sustainable
8 harvest of marine plants. However, we continue
9 to be concerned about the language and various
10 discussion documents that present the over-
11 harvesting of ascophyllum nodosum as an accepted
12 fact.

13 For example, in the most recent
14 discussion document, it would suggest that
15 scientific community has concluded that
16 widespread over-harvesting is occurring, in
17 contrast to the industry position that current
18 activities are sustainable.

19 This conclusion is not consistent with
20 many of the comments on record from renowned
21 phycologists and marine scientists such as
22 Doctors Brawley, Beal, Fegley, and Ugarte whose

1 research has led to the conclusion that
2 ascophyllum is currently being sustainably
3 harvested.

4 For those who are unfamiliar with the
5 harvest of ascophyllum, manual or mechanical
6 cutters move across the inner tidal zone and
7 remove the top portion of the algae while leaving
8 the holdfast and the thallus of the plant intact.

9 This allows for a rapid regrowth in
10 subsequent years with average growth rates being
11 15 to 20, or sorry, 12 centimeters which is
12 approximately five inches in our areas.

13 Harvesting is mostly regulated by
14 local governments and laws that limit the amount
15 of ascophyllum that can be removed in a given
16 year. Current allowed exploitation rates range
17 from 17 to 23 percent of the amount of
18 ascophyllum in a given shore sector.

19 And it should be noted that this
20 allowed harvest rate removes less material than
21 estimates of biomass that is naturally shed from
22 the beds annually due to storm and wave action.

1 The suggestion that there are no old
2 growth areas of ascophyllum in Nova Scotia or
3 Maine is not consistent with facts. In Nova
4 Scotia, for example, the total annual harvest is
5 less than ten percent of the estimated standing
6 stock. In Maine, it is less than two percent of
7 the estimated standing stock.

8 There are many beds of ascophyllum in
9 both areas that have never been harvested due to
10 their geographical locations or their
11 conservation efforts in the areas.

12 It is not in the interest of Acadian
13 or any other marine plant company to harvest
14 ascophyllum in an unsustainable manner. The end
15 result of that would be the creation of a market
16 that we could not then fulfill.

17 It is for this reason that our company
18 has employed a team of marine scientists and has
19 used their findings to create a science-based
20 regulated seaweed harvest that has been
21 recognized as a model of integrated ecosystem-
22 based managements that is being adopted in other

1 jurisdictions around the world.

2 Thank you for your time.

3 MR. CHAPMAN: Thank you. Emily?

4 MS. OAKLEY: I'm so glad that you're
5 here, because you didn't provide written
6 comments. So I'm glad to be able to ask you
7 questions.

8 You made two points, one that it's not
9 in your interest to over-harvest, and that you
10 have a team of scientists on your staff which
11 seems like it would lend itself ideally to being
12 able to support certification to the wild-crop
13 standard.

14 What are your thoughts on that,
15 firstly? And then I have a follow-up after that.

16 MR. HILTZ: Thanks, Emily. So
17 certification of the wild-crop standard, the
18 material that Acadian Seaplants currently
19 harvests for our crop inputs is not currently
20 certified for wild harvest.

21 But we do have a division of our
22 company that manufactures the dried seaweed meal

1 for use in animal feeds and human supplements.
2 That material is currently certified. We have a
3 certifier in Canada that does certify that
4 material to their interpretation of the NOP wild
5 harvest rule.

6 Yes, I mean, certainly we could
7 probably expand all of our harvest to cover that.
8 We feel that the rules, as they're currently
9 written, are open to that. But they are
10 ambiguous in the fact that it is up to the
11 interpretation of the certifier as to how they
12 would do that.

13 So if that is going to be -- moving
14 forward with the Board we hope there would be
15 more concrete rules put in place for that.

16 MS. OAKLEY: Thank you. And then you
17 said that government regulations already limit
18 harvest rates. And so I was wondering if there's
19 a percentage of your boats or operations that are
20 annually reviewed by those government entities.

21 MR. HILTZ: So in Canada, for example,
22 there's an annual report made to the Department

1 of Fisheries there that details all of the
2 sectors that we have been licensed to harvest.
3 It looks at the assessments that our scientists
4 have done in cooperation with scientists from the
5 government to agree on an amount of biomass in
6 that sector.

7 It then reviews the landings that we
8 bring in from that harvested sector in that year
9 and matches the two up to make sure that we're
10 not in any way over-harvesting. We have a
11 resource team in place as the harvest is going on
12 to make sure that we're not doing that. Because
13 again, we don't want to damage that resource.
14 We're depending on it for the subsequent years.

15 MS. OAKLEY: So just to follow-up, no
16 one actually, from the government, does onsite
17 inspections right now that's, like, on the boats
18 themselves? It's more of a dialogue with the
19 scientists in an office, just to clarify?

20 MR. HILTZ: That absolutely is true.
21 I can check with my resource team, but I do not
22 believe the government places inspectors in the

1 field to look at that.

2 MR. CHAPMAN: Asa?

3 MR. BRADMAN: Yeah, I just have a
4 question about impacts on fauna or other aspects
5 of the ecosystem. I can imagine a situation
6 where, you know, your nutrient extraction is
7 replicable and sustainable over time. It's
8 sustainable and it says that it's replicable over
9 time.

10 But are there other impacts on fish,
11 or shellfish, or other marine life that are
12 considered in -- you mentioned licensing or other
13 evaluations of impacts on the environment. If
14 you could comment on that, I'd appreciate it.

15 MR. HILTZ: Yes. Thanks for the
16 question. And in more recent years, we are
17 seeing inquiries from the public and other
18 agencies who are looking for information on that.

19 A lot of the early research that
20 Acadian had done was focused more on the
21 sustainability of the ascophyllum itself. But as
22 those questions have come up, we've started to

1 interface with more groups, especially in Maine,
2 working with the Maine Seaweed Council and other
3 scientists there to try to understand what
4 impacts that our harvesting could be having.

5 We've been harvesting for 30 years in
6 Nova Scotia. And we've seen no negative impacts
7 of the harvest there on any local fish, fauna, or
8 anything else.

9 MR. BRADMAN: When you say you've seen
10 no impacts, how do you come to that conclusion?
11 What information are you using?

12 MR. HILTZ: Just the conclusion that,
13 you know, that has been observed in the
14 environment. You would think that if years and
15 years of this harvest, which has been going on by
16 us and even before us, was having some negative
17 impact, it would have been observed by the
18 Department of Fisheries and Oceans there who are
19 studying the rockweed harvest that they regulate
20 up there.

21 MR. CHAPMAN: Dan?

22 DR. SEITZ: So we heard diametrically

1 opposite testimony about Nova Scotia. Why would
2 you think there would be such a difference in
3 terms of your perception versus other testimony
4 we've heard?

5 MR. HILTZ: Sorry, you heard testimony
6 --

7 DR. SEITZ: We've had diametrically
8 opposite testimony about the adverse
9 environmental impact in Nova Scotia from the
10 harvesting of rockweed. So why do you think your
11 perception and that perception are so far apart?

12 MR. HILTZ: I'm not sure what that
13 researcher who provided the information in Nova
14 Scotia is drawing their conclusion on.

15 Our head resource scientist has worked
16 with Acadian for 25 years to study the
17 ascophyllum resource. We've worked extensively
18 with the Department of Fisheries and Oceans up
19 there who regulates this resource to do studies
20 that show that what we're doing is sustainable
21 and any effects that we're seeing on the
22 ecosystem are short-term.

1 I don't know what else to say. To
2 suggest in Nova Scotia that there are no areas of
3 ascophyllum that have never been cut is just not
4 consistent with the facts. We've mapped the
5 entire coastline up there. There are areas that
6 we don't harvest from, there are areas that other
7 companies don't harvest from just because of
8 their location.

9 MR. CHAPMAN: Thank you very much.

10 MR. HILTZ: Thanks for your time.

11 MR. CHAPMAN: Up next is Trudy
12 followed by Nathan Hecht. Trudy, you can start
13 with your name and affiliation.

14 MS. BIALIC: My name is Trudy Bialic.
15 I represent PCC Community Markets. We are a
16 community-owned and operated grocery retailer in
17 the Seattle metropolitan area. We have nearly
18 60,000 members. So I'm speaking as both a
19 retailer and a consumer -- as a consumer voice as
20 well.

21 First, I want to thank Michelle
22 Arsenault for her support over the many years and

1 Dr. Tucker for her service in stepping up for the
2 program as well. Thank you.

3 In many cases, the consumers
4 connection and relationship with organics is on
5 the ingredient panel. That's what they see. So
6 we want to comment on flavors and gums, if I can
7 get the time to get to gums.

8 On flavors, we oppose relisting
9 flavors as a category. We are asking that NOSB
10 can push the industry to show progress in
11 developing and adopting organic flavors according
12 to the original 1995 plan set by NOSB and also to
13 set a deadline to sunset non-organic flavors.

14 FDA we know allows manufacturers to
15 conceal production of flavors as confidential
16 business information. FDA does not require
17 flavor companies to disclose ingredients of all
18 the chemicals or grass. And companies can
19 maintain secrecy of their formulas and hide that
20 flavors are produced in ways or with substances
21 that they may not wish to disclose.

22 In fact, under US law, biotech

1 generated compounds are legally classified as
2 natural flavors. Natural cheese flavor, for
3 example, can be a production, a product of
4 biotechnology as well as a biotech substitute for
5 MSG called S336 which is called natural flavor on
6 the label.

7 Organic consumers do not want
8 mysterious flavors in their food. And with the
9 lack of transparency between CBI and also this
10 loophole under the US law, it makes it really
11 difficult to know the origins or the process that
12 these flavors are developed.

13 We believe, actually, that consumers
14 want organically produced flavors in organic
15 foods. So it would be very important for the NOP
16 and certifiers to explain to consumers how they
17 can determine that flavors in organic products
18 actually meet the requirements of the annotation.

19 When flavors were approved for
20 addition to the national list, NOSB laid out a
21 plan that included a provision that manufacturers
22 should document in their handling plans progress

1 towards wholly organic natural flavors. So given
2 the concerns voiced, actually, also by the
3 Handling Committee, we feel that the proposal
4 doesn't go quite far enough.

5 And to make sure that we progress
6 towards the original 1995 plan, it's been almost
7 20 years after all, we would ask that the NOSB
8 propose setting a deadline for realizing the 1995
9 plan by adding an expiration date to the proposed
10 listing.

11 On xanthan gum, we urge NOSB to sunset
12 xanthan gum. Any plain reading of 205.600 would
13 show that it prohibits synthetic additives used
14 primarily to recreate or improve texture such as
15 xanthan gum. We believe it's illegally and
16 improperly listed on the list, since its primary
17 purpose and use is to create or improve texture.
18 Thank you.

19 MR. CHAPMAN: Thank you. And, Judy, I
20 have a question and then, Emily, did you --
21 Emily, Dan and then Steve. Hold on, and then
22 Harriet.

1 So, on that last point you raised
2 about plain reading 205.600(b), I have it here in
3 front of me and it reads, in addition to the
4 criteria as set forth in the Act, any synthetic
5 substance used as a processing aid or adjuvant
6 will be evaluated against the following criteria.

7 And then, the criteria you cited is
8 then listed.

9 So, I guess, can you explain to me how
10 xanthan gum is used as a processing aid or
11 adjuvant?

12 MS. BIALIC: It's usually as a
13 stabilizer or texturizer, but it's used to
14 improve texture primarily.

15 MR. CHAPMAN: As an ingredient?

16 MS. BIALIC: As an ingredient.

17 MR. CHAPMAN: But not as a processing
18 aid or adjuvant?

19 MS. BIALIC: No, not --

20 MR. CHAPMAN: So then --

21 MS. BIALIC: -- to my understanding
22 because it's listed on the ingredient panel. If

1 it was a processing aid, it would not be on the
2 ingredient panel.

3 MR. CHAPMAN: So, given that that
4 further requirement is restricted to only
5 processing aids and adjuvants, how is that
6 applicable to xanthan gum?

7 MS. BIALIC: Because it's a synthetic
8 and it's on -- it's a synthetic and a synthetic
9 should not be used primary -- it's primary use
10 should not be used to create -- recreate flavor
11 or texture.

12 MR. CHAPMAN: So, we should require
13 that, even though it's not a requirement in OFPA
14 or in the standards? Is that what you're saying?

15 MS. BIALIC: I'm not -- maybe I'm not
16 clear on the question.

17 MR. CHAPMAN: 205.600(b) limits the
18 further requirement about texture to processing
19 aids and adjuvants.

20 MS. BIALIC: My question would have to
21 do with what -- how adjuvants, it's not defined
22 under OFPA. And so, I believe that the adjuvants

1 are then -- it would be kicked over to a pre-
2 existing USDA definition of adjuvants and it
3 would be used as an adjuvant in that -- under
4 that definition.

5 MR. CHAPMAN: And --

6 MS. BIALIC: And I believe it would
7 fit under the adjuvant definition of USDA,
8 although it's not an OFPA proper. It's not
9 defined under OFPA.

10 MR. CHAPMAN: Can you share that
11 adjuvant definition?

12 MS. BIALIC: I don't have that on me,
13 no.

14 MR. CHAPMAN: Okay.

15 Next up is Emily.

16 MS. OAKLEY: You can skip me.

17 MR. CHAPMAN: Dan?

18 DR. SEITZ: You ran out of time. I
19 was wondering if there were any other substances
20 that you wanted to mention?

21 MS. BIALIC: I would like to mention
22 that gellan gum is also a product of bacterial

1 fermentation and we have had anecdotal reports
2 from consumers over the years that they've had
3 reactions to products of bacterial fermentation
4 causing digestive upset.

5 Gellan gum is not listed as grass, so
6 that's another concern. It's not listed as grass
7 and it also, let's see, there is one study only,
8 there's really insufficient evidence overall on
9 fermented gums to refute or confirm that there
10 are reactions to fermented gums.

11 So, one of the asks that we have on
12 the fermented gums is that NOSB could add to its
13 work agenda consideration of a policy to address
14 concerns about these gums produced through
15 bacterial fermentation.

16 MR. CHAPMAN: Steve?

17 DR. SEITZ: We have a petition for
18 tamarind seed gum on the docket. Given your
19 comments, I could kind of guess what your answer
20 might be of whether we should add that or not,
21 but could you chime in on that?

22 MS. BIALIC: I haven't -- to be

1 honest, I haven't studied tamarind gum. Is it --
2 if it's a product of bacterial fermentation, it
3 would fall under that request to add to the work
4 agenda.

5 DR. SEITZ: It's not --

6 MS. BIALIC: Okay. The other gums --

7 DR. SEITZ: It's a fermented agent.

8 MS. BIALIC: -- the locust bean gum,
9 the carob bean gum, the tamarind gums, those gums
10 we have no objection to.

11 MR. CHAPMAN: Harriet?

12 MS. BEHAR: This is more a question
13 for Lisa, our Handling Committee Chair.

14 Are you -- just, there were some
15 questions about adding things to the work agenda,
16 especially the flavors, perhaps.

17 So, I'm just wondering if your
18 Committee will take that under advisement?

19 MS. DE LIMA: Sure, I mean, I keep a
20 list of everything that comes up in public
21 comment and we'll discuss it when we get back to
22 Subcommittee.

1 MR. CHAPMAN: Ashley?

2 MS. SWAFFAR: So, where were you last
3 year on carrageenan? I believe you said that you
4 wanted it de-listed also.

5 MS. BIALIC: Correct.

6 MS. SWAFFAR: And now, you're saying
7 gellan gum should be de-listed which many, many
8 manufacturers used as an alternative to
9 carrageenan.

10 They listened to consumers and
11 retailers and replaced it with gellan gum. And,
12 we've heard from them that gellan gum is the only
13 alternative.

14 So, are you suggesting we should just
15 eliminate an entire class of products?

16 MS. BIALIC: There are -- I don't know
17 about all the gums, but the locust bean gum, the
18 guar gum, the carob bean gum, we don't have
19 objections to.

20 We are concerned about the fermented
21 bacterial gums because of the anecdotal reports
22 that we've heard.

1 And, there was something else I wanted
2 to say about that and I can't remember what it
3 is.

4 MS. OAKLEY: I mean you quoted a --

5 MS. BIALIC: Oh, yes, it actually
6 narrows the market choices because a lot of
7 times, they're in inorganic foods, they're
8 commonly derived from wheat, corn, soy.

9 So, if you're gluten free or if you're
10 allergenic, it's really narrowing the choices
11 that you can purchase as an organic consumer.
12 They have to avoid those because there's no
13 transparency on how these gums -- what these gums
14 are derived from.

15 Xanthan gum or gellan gum, they can be
16 corn, soy or wheat.

17 So, if they don't know how they're
18 derived, it means that all those consumers who
19 may be sensitive to corn, wheat or soy don't buy
20 those products.

21 So, while they may be functional,
22 there's no transparency in those particular two

1 gums. And, it can be a detriment to enlarging
2 the market. It's narrowing the market, in our
3 view.

4 We're seeing customers not buy these
5 products because they can't tell what they're
6 made from and they're having -- some of them are
7 having reactions.

8 MS. OAKLEY: So, carrageenan would be
9 the alternative for them?

10 MS. BIALIC: Carrageenan, they had --
11 they were avoiding as well. They were avoiding
12 as well.

13 MS. OAKLEY: Right, and I understand
14 they avoid that. But, for those people who have
15 sensitivities and allergies for the gellan gum,
16 carrageenan is an alternative.

17 MS. BIALIC: I would --

18 MS. OAKLEY: Or a product that has to
19 have some type of something to suspend it or
20 something like that.

21 MS. BIALIC: Well, you know, I think
22 it gets down to the question of essentiality. Do

1 you really need gums for these products to exist?
2 Why not shake them up?

3 And, that's what we hear from
4 consumers. They say, we don't want these gums in
5 there. So, they don't buy them.

6 And we saw the market react to
7 carrageenan and we're seeing the market react to
8 some of these other gums, too.

9 MR. CHAPMAN: Emily?

10 MS. OAKLEY: You had -- sorry -- I'm
11 over here.

12 You touched on what I was going to ask
13 originally which was consumer confidence or
14 concern about these products.

15 So, you're saying like how many
16 consumers are you hearing from or how widespread
17 of an issue do you feel this is in terms of the
18 ingredient lists of these products and consumer
19 concern over their inclusion?

20 MS. BIALIC: It's a really good
21 question. I can't quantify it and that's why I
22 bring it up. And, I acknowledge openly, its

1 anecdotal and there just simply isn't enough
2 research on gellan gum, for example, to refute or
3 confirm the reports that we've heard.

4 I've looked and I've only found one --
5 and one study I included in my comments and it
6 referred to they fed rats for four weeks on
7 gellan gum and they found that the intestinal
8 microvilli adhered to one another and decreased
9 digestion of nutrients in the gut.

10 We cannot confirm or deny that because
11 there's no other evidence to concur it to. But,
12 it does seem like a bad idea to us to eat
13 something that's sticky, that can't be digested,
14 has no nutritional value, may impair the ability
15 of the microvilli and may decrease digestion of
16 nutrients.

17 That just doesn't seem like a good
18 idea. And, on top of hearing from consumers that
19 they are having reactions or it's restricting
20 their purchases because they're allergic to corn,
21 soy or wheat, combined, there is some reaction.

22 I can't quantify it and we aren't

1 surveying our members, but we are hearing from
2 them and we do a customer service database with
3 comments from customers. I included a couple of
4 comments in my written remarks.

5 MR. CHAPMAN: A follow up to the
6 allergen questions. Can you help me understand
7 why the Food Allergen Labeling Consumer
8 Protection Act is insufficient to protect organic
9 consumers from corn, soy and wheat allergens?

10 MS. BIALIC: I'm not -- I certainly
11 don't mean to suggest that it's inadequate, but
12 without really knowing, they can't determine. It
13 may contain corn, soy or wheat would be a label.
14 It wouldn't necessary say it does.

15 So, they can't tell whether it's
16 something that they're allergic to or not.

17 MR. CHAPMAN: Okay.

18 And, then, following up in the series
19 of questions that I started with, I spent the
20 five-ish minutes that you were getting peppered
21 with other questions to try and search the inter-
22 webs for a USDA definition of adjuvant. I was

1 unable to find one that was relevant to food.

2 And, frankly, I'd be surprised if
3 there is one from the USDA related to food since
4 most of the food regulation for the USDA, at
5 least for a consumer packed product, would be
6 limited to, like meat products through FSIS.

7 So, and then I tried the FDA and I
8 couldn't find anything briefly.

9 So, if you have additional information
10 in that regard, it would be much appreciated.

11 MS. BIALIC: You know, I tried to
12 scout that down myself. I found one with EPA
13 which wasn't very gratifying, to tell you the
14 truth.

15 But, I don't -- it's being used as a
16 term referring to adjuvants in OFPA, so it's a
17 little bit of a concern that I don't really know
18 what that -- how that's being referred to.

19 But, in general, an adjuvant would be
20 defined as something to help facilitate an action
21 or a result or it's a facilitator. So --

22 MR. CHAPMAN: Yeah.

1 MS. BIALIC: -- in that respect, a gum
2 is a facilitator of texture, in the general
3 sense.

4 But, yes, there is no firm definition.
5 I can't pin it to.

6 MR. CHAPMAN: Thank you.

7 A-dae? Sorry.

8 MS. ROMERO-BRIONES: Hi, so my
9 comments are related to your comments on
10 lecithin. Would you be the person that I would
11 ask about these comments that you submitted? The
12 written comments about lecithin?

13 MS. BIALIC: Oh, on de-oiled lecithin?
14 I don't even remember what I said, to tell you
15 the truth.

16 MS. ROMERO-BRIONES: So, basically,
17 you said that there is organic de-oiled lecithin
18 available. And by de-listing it, it would
19 increase the organic supply.

20 And, you went into great detail about
21 the market around soy lecithin. But, there, and
22 again, going back to the conversation about

1 allergens, so there's a lot of people who are
2 allergic to soy, so I was wondering if you had
3 any information about de-oiled lecithin other
4 than soy?

5 MS. BIALIC: I don't. I know there's
6 safflower lecithin, but I don't know about the
7 availability.

8 My reference to the soy lecithin came
9 out of an OTA report comment from a supplier.

10 MR. CHAPMAN: That safflower lecithin,
11 is it organic?

12 MS. BIALIC: Pardon?

13 MR. CHAPMAN: Is that safflower lecithin
14 organic?

15 MS. BIALIC: I am not hearing you, I'm
16 so sorry.

17 MR. CHAPMAN: Is the safflower
18 lecithin you referenced organic?

19 MS. BIALIC: I can't recall, to tell
20 you the truth. I believe it is. I believe there
21 is organic safflower lecithin on the market, yes.

22 MR. CHAPMAN: Thank you.

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Dan?

DR. SEITZ: Having been involved with a food co-op for many years, the one ingredient that I get the most comments on are flavors because that seems like such a strange category, natural flavors and people say, gee, what could that mean?

And, I was surprised to hear that that could even encompass GMO flavors that are developed with GMO technology.

Can you just elaborate a little bit more on just what is the nature of these flavors and are there organic flavors across a wide spectrum of different needs?

And, what would happen if tomorrow these so-called natural flavors were not allowed in organic products?

MS. BIALIC: I think consumers by and large would hope that the flavors in a food come primarily from the major ingredients themselves and not from a minute compound, that they expect that foods are inherently flavorful or should be

1 inherently flavorful in and of themselves and not
2 needing flavors, not needing an additive to give
3 -- to make it palatable or appealing.

4 DR. SEITZ: Thank you. And, just can
5 you elaborate a little bit more on the range of
6 actual substances or technologies used to make
7 the so-called natural flavors?

8 Because you intimated that you can
9 have GE manufacturer and some would actually be
10 probably more, quote, natural in some sense.

11 So, if you could just give us a little
12 sense of sort of this spectrum of that term
13 encompasses, if you have that knowledge.

14 MS. BIALIC: The definition of natural
15 flavors, I don't have it before me, but the
16 definition, as I recall, refers to -- it includes
17 -- or products of fermentation.

18 And so, it's the clause, products of
19 fermentation that allow genetically engineered
20 products to be included.

21 It's actually a definition. And, I've
22 talked to Consumers Union, example, for about

1 this definition and they felt that it was --
2 Michael Hansen felt that it was a good
3 definition, if I may quote him, I hope I'm not
4 out of line on that.

5 He felt it was a good definition and -
6 - but it does -- it was created before genetic
7 engineering, so the loophole comes because of
8 that emerging technology in the '90s.

9 That's the reason that genetically
10 engineered flavors may be included.

11 The definition, though, essentially is
12 sound.

13 As far as availability of organic
14 flavors, I don't believe that we have done a good
15 enough job in pushing the industry to comply with
16 that 20-year proposal from 1995. It's been 20
17 years, that's a long time.

18 I think our ask is that it be added to
19 work plan to make the manufacturers show
20 progress.

21 But, we are concerned about how --
22 what kind of transparency there can be or how can

1 a certifier verify that a flavor is not produced
2 in prohibited -- with prohibited methods?

3 It's not a transparent process and
4 without having transparency, and coupled with the
5 loophole, it makes it very difficult.

6 MR. CHAPMAN: Thank you.

7 MS. BIALIC: Thank you.

8 MR. CHAPMAN: Thank you for
9 withstanding our several questions.

10 Up next is Nathan followed by Jose
11 Hernandez.

12 If you could start with your name and
13 affiliation?

14 MR. HECHT: Yes, good morning, NOSB
15 members.

16 My name is Nathan Hecht. I am a
17 graduate student of research here at the
18 University of Minnesota in the Organic and
19 Sustainable Food Systems Research Program.

20 We would like to comment on the 2018
21 research priorities for organic crops.

22 By way of introduction, I'd like to

1 just briefly highlight our recent research
2 efforts in organic food systems which has
3 included, among other projects, nitrogen
4 contributions from legume cover crops, nutrient
5 cycling and soil health in organic cash crops,
6 inter-cropped or in rotation with cover crops,
7 season extension options for northern climates,
8 organic management on spotted wing drosophila,
9 organic production of day-neutral strawberries
10 and yield benefits of pollinator farmscaping
11 flower strips.

12 As research scientists at Minnesota's
13 Land Grant Institution, we are passionate about
14 helping to guide the regional organic sector with
15 research-based solutions to complex agri-food
16 challenges.

17 We, as a research community, are
18 uniquely aware of both grower priorities and
19 interests as well as the current gaps in academic
20 knowledge where more research funding and support
21 is critical.

22 After review of the 2018 research

1 priorities, we would like to highlight and
2 comment on the following areas of organic crop
3 research that we believe are important for --
4 specifically for the future of Minnesota organic
5 agriculture and are worthy for consideration by
6 the NOSB.

7 So, to begin, we request the Board for
8 research on what I'm calling agroecological
9 farmscaping practices. These are landscape
10 design and planting strategies organic growers
11 can use to integrate a diversity of plant forms
12 into their farms and better manage biodiversity
13 based ecosystem services.

14 One example of this is managing for
15 natural enemies and wild pollinators by
16 establishing or conserving natural habitat areas.

17 So, in this slide, this is a figure
18 from the Xerces Society that sort of highlights
19 some examples of farming for pollinators and this
20 next one highlights some examples of farming for
21 natural enemies.

22 And the point is sort of the holistic

1 and diverse -- biodiverse landscape that you can
2 see there.

3 So, we need more research on, (a) crop
4 yield cost benefits -- costs and benefits of
5 establishing beneficial insect habitat for pest
6 natural enemies and pollinators and, (b) the
7 influence of landscape context on farmscaping
8 practices.

9 We also request support for further
10 research on covered agriculture including high
11 and low tunnels, greenhouses and gold frames.

12 You can see on the left some examples
13 of low tunnels for strawberries and, there on the
14 right, a prototype of a deep winger greenhouse.

15 Given the unique climatic challenges
16 of growing at more northern latitudes in
17 Minnesota, research is crucial in helping farmers
18 figure out how to extend the growing season,
19 increase profits and mitigate risks.

20 More research is needed on all aspects
21 of growing in these systems including quality of
22 plastic used for tunnels, sustainable soil as

1 potting mixes, appropriate cultivar development,
2 disease and pest management and a nutrient water
3 and waste cycling.

4 Finally, in all areas of organic
5 research, we request support for research that is
6 both interdisciplinary, that is that it aims to
7 collaborate between traditional and academic
8 departments and participatory involving
9 stakeholders, especially farmers in all steps of
10 the research progress.

11 Thank you for attention and
12 consideration. We are grateful for this
13 opportunity to share our perspective with the
14 hope that it may help to guide USDA's efforts and
15 we honor your service and your dedication to the
16 improvement of the U.S. organic agriculture.

17 Thank you.

18 MR. CHAPMAN: Emily?

19 MS. OAKLEY: I just wanted to thank
20 you for commenting on research topics, because
21 I've been doing this lead for three years now and
22 it's nice to have someone come up and speak

1 exclusively to that. So, thank you.

2 MR. HECHT: Thank you.

3 MR. CHAPMAN: Harriet?

4 MS. BEHAR: I second that and I

5 encourage you to continually send us ideas.

6 MR. CHAPMAN: Thank you very much.

7 Up next is Jose Hernandez, followed by

8 Terry Shistar.

9 MR. HERNANDEZ: Yes, good morning. My

10 name is Jose Hernandez, I'm from St. Paul,

11 Minnesota. I am an agronomist. I was trained in

12 agronomy in Costa Rica at the Earth University

13 and now I hold a PhD in soil science from the

14 University of Minnesota.

15 I worked for about eight years in

16 research and outreach in the areas of nutrient

17 management and soil quality at the University of

18 Minnesota.

19 And now, I work as an R&D manager for

20 a Canadian company, Precision Farming.

21 I come here today to represent organic

22 consumers. My family and I are of the organic

1 consumers and we are members of an organic
2 community support to agriculture farm and we also
3 buy organic at our co-op in the Mississippi
4 Market every week for about 18 years now since we
5 live here.

6 We value the organic certification and
7 the standards. I understand the Board today is
8 reviewing their position on the use of ethylene
9 as an allowed synthetic for organic pineapple.

10 As a consumer, I am here to ask the
11 Board to support the use of ethylene in organic
12 pineapple for flower induction.

13 As a consumer, I am primarily
14 concerned about pesticide usage and abuse,
15 effects in the environment and residues of these
16 chemicals in the food we ingest as well as best
17 economic practices.

18 I think the ethylene use for flower
19 induction is safe and, moreover, there is not a
20 viable alternative for organic producers.

21 Prohibiting the use of ethylene will
22 be devastating for small pineapple producers as

1 some of these growers -- some of these many cause
2 undesirable consequences like some of these guys
3 may go back to conventional pineapple, for
4 example, and maybe force or maybe causing --
5 maybe exposing people to pesticides, you know,
6 workers, families, towns, water waste soils.

7 And other consequences may be they're
8 lowering their supply of these pineapples and,
9 therefore, increasing prices and making the
10 availability of these products for, you know,
11 medium and low income families.

12 I urge the Board to support the use of
13 ethylene for flower induction in organic
14 pineapple. Organic farm is critical in our food
15 systems and we are facing the same challenges to
16 feed a growing population in this world.

17 So, we should be using science-based,
18 common sense standards and regulation to allow
19 our organic producers be competitive in a
20 thriving organic farming business.

21 Thank you very much for the
22 opportunity to comment.

1 MR. CHAPMAN: Thank you.

2 Questions? Thank you very much.

3 MR. HERNANDEZ: Thank you.

4 MR. CHAPMAN: Up next is Terry Shistar
5 followed by Jose Quirce.

6 Terry, you can start with your name
7 and affiliation.

8 MS. SHISTAR: Okay, my name is Terry
9 Shistar and I'm on the Board of Directors of
10 Beyond Pesticides.

11 Board members, with your expertise in
12 many areas guide us in our efforts to promote
13 organic practices. Looks like I have to advance.

14 We've submitted comments on all of the
15 issues before the Board at this meeting but I'll
16 just address a few.

17 First, it's time to stop adding
18 listings to 606. It once made sense to allow a
19 small proportion of non-organic ingredients and
20 processed organic foods if they were not
21 available in organic form.

22 However, now that the -- any

1 agricultural commodity can be produced
2 organically, listing on 606 only stifles organic
3 production of new organic crops and promotes
4 chemical intensive production.

5 Finally, in the time that it takes to
6 add new regulations, petitioners could overcome
7 obstacles to supplying the organic products. Do
8 not approve the petitions for tamarind seed gum,
9 Ethiopian peppers, Japonese peppers or collagen
10 gel casing.

11 Antimicrobials used in medicine should
12 not be used in agriculture. The spread of
13 antimicrobial resistance is a healthcare crisis
14 of major proportions. Many infectious diseases
15 are resistant to the most commonly prescribed
16 antimicrobials, resulting in longer lasting
17 infections, higher medical expenses, and the need
18 for more expensive or hazardous medications.

19 Microbes of all sorts, fungi and well
20 as bacteria, evolve quickly and antimicrobials
21 provide strong selection pressure for those
22 strains with genes for resistance.

1 Do not allow the use silver dihydrogen
2 citrate of natamycin, which are antimicrobials
3 used in human medicine. Natamycin treats
4 infections of candida and other pathogens and
5 resistance to natamycin is found in candida
6 albicans. Ionic silver is used in surgical
7 dressings and is associated with bacterial
8 resistance to silver and antibiotics.

9 Fumigants are not compatible with
10 organic production. Organic production uses
11 practices that feed soil organisms who feed crop
12 plants. It creates healthy soil food webs.
13 Using a toxic chemical to wipe our soil biology
14 is the antithesis of organic practices.

15 Do not approve the petition of ally
16 isothiocyanate. It would be difficult to find a
17 practice less compatible with organic production
18 than soil fumigation with what the technical
19 review calls a broad spectrum antimicrobial
20 compound that effectively kills both plant
21 pathogens and beneficial soil microorganisms.

22 Finally, organic production must

1 protect marine ecosystems. Promotion and
2 protection of biodiversity and ecosystem health
3 is central to organic production. Marine
4 ecosystems are at risk and the organic community
5 should protect them from further damage.

6 Thank you.

7 MR. CHAPMAN: Ashley?

8 MS. SWAFFAR: I have multiple
9 questions, but I'll just ask the one first about
10 SOEs and oxalic acid.

11 So, oxalic acid, I share your same
12 viewpoint on we don't have apiary standards, so
13 why are we reviewing those materials?

14 So, I thank you for putting that
15 comment in there.

16 And then, on SOEs --

17 MS. SHISTAR: I'm sorry, I didn't hear
18 you.

19 MS. SWAFFAR: On SOEs --

20 MS. SHISTAR: Oh, SOEs.

21 MS. SWAFFAR: -- you mentioned that,
22 you know, we haven't heard from beekeepers and we

1 maybe shouldn't relist it because we don't have
2 standards here in the U.S.

3 Are you aware of anything
4 internationally since the U.S. doesn't produce
5 much honey at all, it's all coming out of Brazil,
6 any -- do you know anything about any of that
7 production in Brazil?

8 MS. SHISTAR: No.

9 MS. SWAFFAR: Okay. I might have
10 questions later.

11 Is that all? Can I go --

12 MR. CHAPMAN: Sorry, I had Steve, Asa
13 and A-dae.

14 Steve:

15 MR. ELA: I support your comments
16 about antibiotic use in agriculture and human
17 use. Is there -- would you just draw the line if
18 there is any human use for an antibiotic that
19 should not be used in agriculture or is there
20 some threshold, I mean, if it's extremely minor
21 use, I guess, yes, we kind of wrestle with these
22 questions that, you know, black and white

1 sometimes becomes very rigid.

2 MS. SHISTAR: Well, it's hard to draw
3 a line in a hypothetical situation, right? But,
4 the problem is that any time you use antibiotics,
5 antimicrobials, you're increasing the chance of
6 resistance.

7 And, we just don't have that many
8 antimicrobials left that can treat human disease.
9 So, you know, it would take a lot to convince me
10 that something needed to be used in agriculture
11 if it was used to treat human disease.

12 MR. ELA: And, I guess as a follow up,
13 if a, I mean, let's take natamycin which is an
14 antifungal, which could reduce rots and things in
15 fruits which also have human health consequences,
16 for example, patulin and some of those.

17 Where -- is there any tradeoff there?

18 MS. SHISTAR: Well, I think you have
19 other options with the fruit. And, as I said,
20 any use of these antimicrobials increases the
21 chance of resistance.

22 So, even the use in medicine increases

1 the chance of resistance. So, it's really that's
2 where I think the risk benefit needs to be, you
3 know, needs to take place.

4 My view is that it doesn't belong in
5 agriculture because the risks are too high.

6 MR. CHAPMAN: Asa?

7 MR. BRADMAN: I have a question about
8 AITC. Yesterday, there was a suggestion by a
9 commenter that there may be a use for AITC with
10 nursery stock and that use of it in that setting
11 only might actually reduce the use of harsher
12 conventional pesticides for nursery stock that's
13 produced and then moved into the organic sector.

14 And, I'm curious if you have any
15 thoughts on that particular use of AITC?

16 MS. SHISTAR: Well, first of all, I
17 don't think we have any control over what happens
18 in the non-organic sector which is where those
19 things are being grown, where they're being
20 fumigated with those highly toxic materials.

21 And, adding, you know, adding
22 something to the national list only increases the

1 risk in organic. It's just not compatible with
2 the way we do things in organic.

3 MR. BRADMAN: Right, but these are --
4 sorry, my mic seems to be problematic.

5 These are plants that are, you're
6 right, they're produced in the non-organic sector
7 and then they're moved into the organic sector.

8 MS. SHISTAR: Right.

9 MR. BRADMAN: So, I guess, again, is
10 there a use there that it might actually reduce
11 the use of some harsher conventional pesticides?

12 MS. SHISTAR: I don't --

13 MR. BRADMAN: And is that --

14 MS. SHISTAR: -- see it.

15 MR. BRADMAN: Okay.

16 MR. CHAPMAN: Okay, I had A-dae, then
17 we'll to Rick then Ashley and Emily.

18 MS. ROMERO-BRIONES: So, my question
19 is regards to your comment on Japonese peppers
20 under 606.

21 So, one of the things I struggled with
22 was figuring out how to get information about the

1 availability of organic supply for some of the
2 materials that are being proposed to be listed
3 under 606.

4 And, in your comments, you mentioned
5 that we should take a lesson from the experience
6 with hops. Can you just briefly summarize that
7 for me? Because I'm not privy to that.

8 MS. SHISTAR: Well, the main lesson is
9 that, as long as you're allowing the non-organic
10 product, there's no incentive to develop the
11 market for the organic product.

12 The hops was a very complicated thing
13 because hops -- because the people who use the
14 hops had to contract with the hop growers and
15 they're contracting for a specific varieties.

16 But, the -- they worked it out, you
17 know? And, I think the same thing happens with
18 peppers and with just about anything that I can
19 imagine being petitioned for 606 is such a long
20 period between the time that if you approve it,
21 you know, if you were to approve the petition
22 here and now, it's going to take at least a

1 couple years before they can use them because of
2 all the regulatory process it goes through.

3 And, peppers are not that hard to
4 grow. Right, Emily? So, it's something that
5 could easily -- there could easily be organic
6 producers that fill that market that fall into
7 the market in that time.

8 MR. CHAPMAN: Then I had Rick.

9 DR. GREENWOOD: I had a question. You
10 were very definitive about not using antibiotics
11 in agriculture. But, I wanted to hope that you
12 could clarify that doesn't mean not using them
13 for infected animals?

14 MS. SHISTAR: Well, what we're -- as I
15 understand the regulations, the regulations
16 require that organic producers treat infected
17 animals --

18 DR. GREENWOOD: Okay, well I --

19 MS. SHISTAR: -- but they go out of
20 the organic system.

21 DR. GREENWOOD: Yes, but I just wanted
22 to make sure that that was clear.

1 MS. SHISTAR: Yes, yes, yes.

2 MR. CHAPMAN: Ashley and then Emily?

3 MS. SWAFFAR: So, everyone's favorite
4 topic is paper pots so I had a question for you.

5 So, I always look to you and Jay for
6 the conservative voice in the room and --

7 MS. SHISTAR: And here we are saying
8 that you should have an extension.

9 MS. SWAFFAR: Yes, I wanted -- because
10 you raised concerns about the adhesives and you
11 guys always raise a lot of concerns and I think
12 they're always well thought out and I appreciated
13 them.

14 So, why should we have an extension on
15 an item if you have a concern about the adhesive?

16 MS. SHISTAR: Well, because I read the
17 TR on newspaper and recycled paper and I was, you
18 know, when I read it, I think I said this last
19 time I was up here, we were lobbying for a TR on
20 newspaper because we thought, oh, if all these
21 new inks, it's probably, you know, there's
22 probably new information that make it less, you

1 know, maybe things are less toxic, maybe the
2 colored inks annotation isn't necessary.

3 But then, reading the TR, there are
4 so many things that can be in paper. So, you
5 know, and then looking at the petition on the
6 paper pots, it seemed like this is peanuts
7 compared to what is already allowed.

8 And that -- and it also seemed like
9 the particular -- the adhesives that they're
10 talking about are already in the paper.

11 So, I, you know, it just -- so, I'm
12 looking at, okay, so what if you can't approve
13 this petition this time. So, what if you approve
14 it the next time, what happens -- well, if you --
15 if they stop allowing paper pots, then you'd
16 have, you know, people going off and finding some
17 new way of doing things or else threatening their
18 certification and I really don't like that
19 tactic.

20 But, and then, they come back, you
21 know, and say, okay, you've approved them and
22 then it'll be a couple years before they actually

1 use them because it won't go on the list.

2 Okay, but what if you approve an
3 extension here and then you approve -- and you
4 approve something that's on there. If you don't
5 approve it, then people have to go do something
6 else.

7 But, if you do approve it, after
8 approving the extension then it causes much less
9 disruption and, you know, those people won't have
10 had to go.

11 And, sure, you would have had, you
12 know, it'll still be time for it to be on --
13 it'll still be a couple years before it's
14 actually on the national list. But, you probably
15 won't mind proposing another extension at that
16 point since you've already approved the material.

17 MR. CHAPMAN: Thank you, thank you.

18 MS. SWAFFAR: Just one word answer
19 follow up. If we were voting on paper pots
20 today, would you say to list or not?

21 MS. SHISTAR: I couldn't tell you. I
22 think that it's important to look at the

1 technical review and get all the information.
2 I'm not going to say that they should be approved
3 right now.

4 I think it's an ingenious system, it's
5 saved a lot of work for a lot of small growers.

6 MR. CHAPMAN: Thank you.

7 MS. SHISTAR: So, I hope that it turns
8 out well.

9 MR. CHAPMAN: Thank you, Terry.

10 Emily?

11 MS. OAKLEY: Two follow ups, one to
12 Asa's question about AITC. I mean, I think the
13 question the way you were proposing it was
14 sounding as if we would approve that material in
15 the hope that conventional growers would then use
16 it for products or plants that organic farmers
17 would then buy. Is that what I was hearing?

18 MR. BRADMAN: No. Well, I mean I
19 guess my hope would be is that there could be a
20 certified organic --

21 Hello? Is this working now?

22 MR. CHAPMAN: Yes, we can hear you.

1 MR. BRADMAN: -- that there could
2 ultimately be a certified organic phyto, you
3 know, sanitation certified product that was
4 produced entirely with less toxic organic methods
5 that can then go into the organic system. It
6 would create a market for that kind of nursery
7 stock.

8 Not that we would approve something
9 with the idea that, you know, maybe conventional
10 growers would somehow switch out, you know, this
11 material.

12 MS. OAKLEY: Thanks for that
13 clarification.

14 And, just to A-dae's point, and I hope
15 my head shaking was clear. I was trying to say
16 that, Japonese peppers, capsicum frutescens and
17 it's very easy to grow and I could grow that.

18 MR. CHAPMAN: Can you also process it
19 into a dried product in a --

20 MS. OAKLEY: I knew you were going to
21 say that.

22 MR. CHAPMAN: -- third-party additive

1 FSMA approved facility?

2 MS. OAKLEY: I knew you were going to
3 say that, and so, let's carry that discussion
4 over to the Handling Subcommittee section.

5 MR. CHAPMAN: All right.

6 I don't see any other questions for
7 you, Terry. Again, thank you for answering our
8 numerous questions.

9 MS. SHISTAR: Okay.

10 MR. CHAPMAN: Up next is Jose followed
11 by Laura Batcha.

12 MR. QUIRCE: Good afternoon, good
13 morning. Good afternoon, my name is Jose Carlos
14 Quirce. I'm here today on behalf of the Ministry
15 of Foreign Trade of Costa Rica, its trade
16 representative in the United States of America.

17 I would like to thank the National
18 Organic Standards Board for giving us the
19 opportunity today to provide our comments and
20 suggestions regarding the involvement of ethylene
21 gas in the production of organic pineapple.

22 In addition, I would like to underline

1 our recommendation of the transparent way in
2 which the United States is conducting this
3 rulemaking process.

4 I want to take this opportunity to
5 respectfully urge the Board to vote against the
6 exclusion of ethylene gas from the national list
7 and, instead, extend a sunset period for the use
8 of ethylene gas in organic pineapple for an
9 additional five years in accordance with the
10 Organic Foods Production Act.

11 Costa Rica has been positioned as
12 number one producer and exporter of pineapple in
13 the world with more than 2.2 million tons in
14 2017.

15 Pineapples are Costa Rica's second
16 most important products in terms of value and
17 Costa Rica is the main supplier of pineapples in
18 the U.S. market.

19 Producers of the commodity include 141
20 exporting companies of which 63 percent
21 represents small and medium sized enterprises.

22 And, they employ 32,000 workers

1 according to statistics form 2017.

2 Pineapple growers provided 85 percent
3 of pineapple imported by U.S. which in 2017
4 reached \$633 million and 976 tons.

5 In addition, in 2017, organic
6 pineapple represented 21.5 percent of the total
7 organic production in our country. That same
8 year, it was the second most important product in
9 Costa Rica organic production.

10 Organic producers have 1,875 hectares
11 of certified organic land growing on an average
12 and a rate of 14 percent in yearly basis, taking
13 into account the years 2012 to 2017.

14 Due to this high productivity levels
15 and efficiencies, Costa Rica has positioned
16 itself in the right place to increase pineapple
17 production from 29 tons to 49 tons per hectares,
18 almost 66 percent increase in the last 25 years.

19 Costa Rica has decades of genuine
20 commitment to sustainable production from both
21 pineapple growers and organic pineapple growers.

22 The industry is an important

1 contributor to the export diversification policy
2 and the development of our country.

3 A change in worldwide regulations like
4 the use of ethylene in organic pineapple
5 flowering might affect hundreds of people and a
6 good amount of small and medium sized producers.

7 These producers work hard to
8 differentiate their products and to comply with
9 market requirements while meeting the strictest,
10 most secure safety and health center.

11 In all this, ethylene gas is a key
12 factor for the production.

13 Thank you very much.

14 MR. CHAPMAN: Thank you.

15 Any questions for Jose?

16 (No audible response.)

17 MR. CHAPMAN: Thank you very much.

18 MR. QUIRCE: Thank you.

19 MR. CHAPMAN: Up next is Laura
20 followed by Natalie Krout.

21 MS. BATCHA: Hi, I'm Laura Batcha with
22 the Organic Trade Association and I wanted to

1 talk to you today about origin of livestock,
2 clarify something around flavors, and if I have
3 time, to talk about the impact to our membership
4 of a shortened period for providing comments on
5 the docket for this meeting.

6 So, just on the flavors discussion
7 that happened before, clarify that the Organic
8 Trade Association a few years ago submitted a
9 petition to require organic flavors when
10 commercially available, passed by the Board, when
11 to USDA, went through the proposed rule process.
12 We're waiting on a final rule. That petition was
13 in accordance with the 1995 recommendation passed
14 by the Standards Board.

15 So, I just wanted to make sure
16 everyone and new Board members understood that.

17 On origin of livestock, we've heard
18 discussions about it here at the meeting in the
19 session and in the hallway. There's really a
20 couple of issues.

21 One of them is new and one of them is
22 old and I have a request for the Board in regards

1 to this discussion.

2 So, the new issue is the sort of what
3 we would consider the revelation of the practice
4 of moving an animal born to an organic mother out
5 of organic production on a certified organic farm
6 and then moving it back in later for a re-
7 transition one animal at a time.

8 That practice is against our
9 longstanding understanding of how the rule should
10 operate as a trade association.

11 The old issue was, of course, the two
12 track system and continuous transition that the
13 Board passed six recommendations on between '94
14 and 2006 for which there was an OIG audit that
15 referenced this issue.

16 And there was a proposed rule that was
17 released, comments were received and the proposed
18 rule was closed at USDA.

19 We heard from the program, there are
20 real challenges around taking clarifying action
21 with the underlying rule being the state that it
22 is.

1 Yet, we don't have the proposed rule
2 moving to final on the unified agenda at USDA.

3 So, this is a conundrum, you can't get
4 there from here. So, my request to the Board is
5 for you all to consider passing a resolution at
6 this meeting urging the Secretary to move
7 directly to final rule on origin of livestock.

8 The information is all there, 1,500
9 comments were received. Five opposed the proposed
10 rule as written and those objections to the
11 proposed rule were on the basis of there being an
12 under supply of milk which we all know is not the
13 situation now.

14 So, I would respectfully request you
15 consider that as you finish your week out.

16 On the comment period, I will just
17 say, 13 business days where a membership-based
18 organization. As the leader of the organization,
19 I don't like our positions to be driven by staff
20 thinking in a vacuum.

21 We reflect the will of our members and
22 we have really good processes about how we review

1 the comments, we form task forces, we go out we
2 vet a draft comment, then the working group
3 releases the draft comment to the entire
4 membership so that thousands of members have an
5 opportunity to see where we're going with
6 something, provide comment, finalize them, submit
7 them.

8 That's a lot of process for the team
9 to work through in 13 business days. It limits
10 our ability to give you guys good input from the
11 trade.

12 Thank you.

13 MR. CHAPMAN: Questions for Laura?

14 Ashley?

15 MS. SWAFFAR: So, Laura, we heard from
16 the program and last year from the Secretary
17 about some of the items that this Board has
18 worked on and wants to work on that we should
19 just have the industry do process verified
20 labels.

21 Does the trade association have any
22 views on adding more labels to products?

1 MS. BATCHA: So, I think the
2 suggestion of PVP being an alternative route to
3 advance issues is an interesting one and one that
4 we have considered as a trade association and
5 done some sort of strategic work amongst the
6 memberships and sort of, in theory, it might make
7 sense.

8 What we've run into in engaging with
9 staff at the process verified program through an
10 attempt to do that for transitional certification
11 program and some other ideas is, again, one of
12 these what we're finding ourselves in which are
13 Catch-22's.

14 So, our thinking on how you might use
15 PVP to advance some of this stuff would be that
16 it would be entirely tethered to organic. And
17 so, you would have to be certified organic first
18 and we would want to utilize the existing ACAs as
19 the verification arm for whatever this additional
20 layer was.

21 The feedback that we've gotten most
22 recently from the process verified program is

1 they don't think they can allow cabining and
2 tethering to the organic standards and the
3 exclusive use of the organic ACAs.

4 So, we're getting two different
5 conflicting suggestions about how that path
6 forward might be an option for us just because,
7 quite frankly, we're the Organic Trade
8 Association, we're not interested in a process
9 verified claim in a vacuum that isn't tied
10 exclusively to organic as the base.

11 MR. CHAPMAN: Dan?

12 DR. SEITZ: I didn't quite understand
13 the point you made about flavors. Are you saying
14 that the Board has, and if you can refresh my
15 memory, that the Board has already put out a
16 recommendation that that language be adopted,
17 that you must use organic flavors and may only
18 use others if organic is not available and that
19 hasn't yet been acted on?

20 MS. BATCHA: Yes, so I'll do my best
21 to clarify. I think most of you that know our
22 team at OTA know that I am certainly not the

1 flavor expert and Gwendolyn is. But, I know
2 enough to I think answer your question.

3 So, the Organic Trade Association
4 petitioned for the change in the listing of
5 natural flavors as a nonsynthetic,
6 nonagricultural allowed ingredient.

7 And, our petition called for there to
8 be an annotation to that listing requiring that
9 organic be used when available which was
10 consistent with what NOSB did back in 1995.

11 That petition went through the
12 process, to the Board, approved the petition,
13 back to USDA. USDA has released the proposed
14 rule, received comments on proposed rules,
15 closed. We're waiting on a final rule.

16 We don't have any indication to think
17 that the final rule is stalled in any way. But,
18 I just wanted to make sure that the folks on the
19 Board understood that the issue came through the
20 process. You guys made a recommendation and
21 action has happened.

22 Does that help?

1 DR. SEITZ: It helps a lot. Thanks.

2 MR. CHAPMAN: Paul, can you at all
3 speak to the status of that proposed rule?

4 DR. LEWIS: Sure, thank you, Tom.

5 So, I think Dr. Tucker mentioned this
6 during her opening remarks because we have a
7 number of National List rules that are going
8 through the clearance process. It's really hard
9 in terms to make an estimation for the Board and
10 for the public as to when that will go through
11 clearance.

12 Clearance goes through a number of
13 levels. So, we appreciate peoples patience as we
14 go through reviewing the public comments and,
15 more important in terms of just, importantly,
16 going through the clearance process in the
17 Department.

18 MR. CHAPMAN: Would it be fair to say
19 it's being actively worked on?

20 DR. LEWIS: Yes, I would say it's
21 actively worked on and obviously, briefing
22 leadership in the Department in terms of how to

1 move forward on this.

2 Thank you.

3 MR. CHAPMAN: Any other questions for
4 Laura?

5 Laura, in terms -- I have a quick one
6 on the comment piece. If we were to piecemeal
7 our proposals out, would that meet the needs of
8 the Trade Association to get feedback from its
9 membership? What other suggestions do you have?

10 There's clearly -- there was some --
11 I'm not sure if you were here earlier, there was
12 some explanation of the tradeoff between Board
13 time to work on stuff, NOP clearance times and
14 then the amount of time the public has.

15 What's your suggestions that we --

16 MS. BATCHA: Yes, so I completely
17 recognize that everybody needs more time in the
18 system and certainly don't disagree with the
19 outline of how long it takes to move something
20 through USDA and the time it takes you guys to
21 get to a recommendation.

22 I think asynchronously posting them as

1 final recommendations, from my perspective, would
2 be a preferred route to posting drafts because I
3 think it's just really hard to get to the heart
4 of the matter in a membership organization when
5 you're having a conversation about something that
6 may change by the time it gets posted.

7 So, I think I, from a workflow and
8 getting really good feedback for the Board would
9 prefer to see them posted one at a time as they
10 get finalized.

11 MR. CHAPMAN: Thank you.

12 MS. BATCHA: Thank you.

13 MR. CHAPMAN: Thank you, Laura.

14 Up next is Natalie followed by Keith
15 Lindsey.

16 MS. KROUT-GREENBERG: Great. Good
17 afternoon, my name is Natalie Krout-Greenberg. I
18 am the Director of Inspection Services at the
19 California Department of Food and Agriculture.

20 I'd like to extend a welcome to the
21 two new NOSB Board members, Dr. Greenwood and Mr.
22 Schwartz from California.

1 The Inspection Services Division
2 provides inspection and enforcement oversight to
3 agriculture commodities in California and
4 specific to this audience, Inspection Services
5 houses both the California organic input
6 materials program and the California State
7 Organic program.

8 Since Dr. Dale Woods already covered
9 specific areas to the OIM program yesterday, my
10 comments will be focused on the SOP and reflect
11 the work being done relative to the Pasture Rule
12 as well as imported grain products.

13 California Organic Foods Act of 1979
14 established the state organic program. And, in
15 2003, the Act was written to conform with the NOP
16 standards.

17 And then, 2016, it was recast as the
18 California Organic Food and Farming Act.

19 Some numbers for a perspective,
20 California accounts for more that 40 percent of
21 all organic products sold in the U.S. and the
22 state has 1.7 million acres in organic

1 production.

2 This past fiscal year, the state
3 organic program registered over 4,200 organic
4 operations in California who process nearly 2,000
5 cost share applications reimbursing just over
6 \$1.1 million, handled over a 100 complaints,
7 conducted over 1,400 inspections.

8 And, during the past three years, the
9 SOP obtained 883 organic samples and analyzed
10 them for pesticide residues of which
11 approximately 4 percent of the surveillance
12 samples were found positive.

13 We have seven state staff dedicated to
14 organic program, five of which do enforcement
15 work solely. And, we hold contracts with 53
16 counties who perform work on inspections on
17 behalf of the state organic program for CDFA.

18 The California Organic Product
19 Advisory Committee, or COPAC, makes
20 recommendations to the SOP and the California
21 Secretary of Agriculture.

22 Through public comment and at our

1 COPAC meetings, the complaint process and
2 meetings with organic dairy industry, we have
3 heard concerns associated with enforcement of the
4 pasture rule as well as imported grain products.

5 First, regarding enforcement of the
6 pasture rule, there are 85 registered dairy
7 operations in California. Our team has been
8 working closely with the industry to understand
9 the issues and with our partners at the NOP and
10 certifiers in the state to address the voiced
11 concerns.

12 This is an organic enforcement
13 priority in our state.

14 Second, regarding imported products,
15 California is an 86 percent grain deficit state.
16 We receive grain by ship, rail and truck in order
17 to feed the state's livestock population.

18 The SOP continues to work closely with
19 our state mandated feed inspection program and
20 federal partners to provide surveillance to the
21 products coming through our California borders.

22 We continue to collaborate with the

1 NOP and I want to thank Dr. Tucker and her team
2 for help addressing these concerns.

3 And, finally, I appreciate your time
4 as NOSB members and your dedication to that.

5 I'd be happy to answer any questions.
6 Thank you.

7 MR. CHAPMAN: Thank you.

8 Any questions? I know I have a
9 question.

10 Okay, I will go then. So, first of
11 all, thank you for speaking. I want to recognize
12 as one of the four Californians on this Board.
13 And, as people know, any chance I have to brag
14 about California.

15 There's five? Did I miss someone?
16 Who'd I miss? No, there's four of us. Yes, four
17 Californians.

18 I always take a chance to brag about
19 California. I really want to recognize the State
20 of California, particularly the CDFA program for
21 its contribution to organic integrity and
22 enforcement, with the programs you outlined and

1 the stats you just outlined show the large share
2 of the burden that the State of California takes
3 up.

4 And, it should be recognized that that
5 then frees up federal resources for enforcement
6 integrity activities elsewhere throughout the
7 nation.

8 And, that doesn't come free, that
9 comes out of costs the California organic
10 producers and handlers who then through fees
11 assessed on them fund that state organic program.

12 And I'm hoping California can, through
13 a course of dialogue, share some of its best
14 practices its learned in its enforcement program,
15 particularly its surveillance program.

16 As an organic consumer, I'm always
17 heartened when I go to my farmers' market and see
18 a CDFA inspector checking organic certificates at
19 the market. And I think I spook them when I
20 thank them for that activity.

21 But, it's heartening to see it
22 actually happening out there and seeing that

1 enforcement at all levels of the supply chain
2 beyond, you know, big operators as well as grain
3 like you spoke about, also though down to that
4 farmers' market level.

5 And then, my question for you, if
6 you're prepared to answer it was the share kind
7 of where are your enforcement challenges and what
8 role you would see the NOSB in playing in that
9 arena.

10 MS. KROUT-GREENBERG: Okay, so, to
11 your first point, Tom, and thank you for those
12 comments to the state organic program.

13 So, for your first point as far as
14 relative to our enforcement surveillance work,
15 you did mention farmers' markets.

16 So, one of the unique things about
17 Inspection Services Division, we house three
18 particular branches.

19 One is our Center for Analytical
20 Chemistry which does all of our enforcement work
21 tied to analysis.

22 The other is our Feed Fertilizer

1 Livestock Drugs program which Dale is a part of.

2 And then, we have our Inspection and
3 Compliance Branch. So, that houses organic and
4 houses direct marketing and houses our food
5 safety program that's handling all things FSMA
6 related.

7 So, with that, you mentioned, we go to
8 farmers' markets, but we have contracts with DPR,
9 Department of Pesticide Regulations, tied to our
10 chemistry lab. And, when they are out also
11 exploring markets whether it's a farmers' market
12 or whether in a retail operation, they share that
13 organic data with us as well.

14 And so, leveraging that, leveraging
15 our feed partners, we're able to have
16 surveillance arms in multiple facets throughout
17 and across the division.

18 Regarding challenges, I think we've
19 seen probably some of the biggest challenges
20 surface within the most recent 12 months to 18
21 months.

22 And, for us, it was visibility into

1 our ports of entry. California has 11 ports of
2 entry. And, just when you have borders and our
3 that much of a grain deficit state, understanding
4 and knowing what's coming into those ports was a
5 challenge.

6 We work closely in our relationship
7 with the Food and Drug Administration as well as
8 our partners at USDA.

9 But, just having that visibility into
10 those database systems and how it was working was
11 probably the biggest challenge as of late and it
12 continues to be.

13 And so, that's, I guess, one thing
14 that I have continually been working with our
15 partners at the NOP to have that added visibility
16 as well as our state partners in the feed
17 inspection program because they do have a strong
18 relationship with FDA in that sense as well, just
19 from a food safety perspective.

20 But, that, when you marry those pieces
21 all together, it gives you added value in that
22 surveillance program.

1 MR. CHAPMAN: Thank you. Thank you
2 very much for your comments.

3 MS. KROUT-GREENBERG: Thank you.

4 MR. CHAPMAN: Up next is Keith Lindsey
5 followed by Dolana Blount.

6 Keith? Keith, going once? Keith
7 going twice? All right, no Keith.

8 Dolana Blount, are you here? I think
9 you are.

10 If you could start with your name and
11 affiliation? After Dolana is Alesia Bock.

12 MS. BLOUNT: Thank you.

13 My name is Dolana Blount, I with PURE
14 Bioscience, the petitioner for silver dihydrogen
15 citrate.

16 I thank you for the opportunity to
17 present you with additional comments in support
18 of its listing on the national list.

19 The need for SDC is especially
20 important in organic and conventional processing
21 and production. SDC based products like pure
22 hard surface disinfectant sanitizer and pure

1 control processing aid enhance food safety
2 practices and support processors in meeting
3 robust food safety programs.

4 Produce processing which, to date, has
5 not seen a processing kill step available will
6 especially benefit from SDC.

7 Several food industry leaders
8 consultants and our customers including the
9 leading produce processor have already shared
10 their support for SDC in the written comments.

11 SDC is a molecular complex of ionic
12 silver weakly bound to a citrate ion. Citric
13 acid supports the ion in solution and assist
14 entry into the bacterial cell. This is not
15 nanotechnology and it does not meet the most
16 standard recognized definitions of
17 nanotechnology.

18 When formulated for use, SDC solutions
19 are 95 percent water with silver present only at
20 .003 to .016 percent.

21 Ionic silver is strongly attracted to
22 sulfidic groups which are found in structural and

1 functional components of an organism and will
2 bind to those complexes while silver ions are
3 taken into an organism by the citrate.

4 This dual mode of action results in
5 rapid efficacy while mitigating resistance.

6 After use, any remaining silver and
7 bacterial waste will be transported into the
8 facility's waste water treatment system.

9 SDC is used in facilities that have
10 either onsite waste water treatment that
11 discharge to publically owned treatment works or
12 the discharge to surface waters under the
13 appropriate EPA or state permit.

14 Here, they will be met with
15 concentrations of organic matter and other
16 compounds, primarily sulfides and be rendered
17 inert.

18 Only insoluble silver salts and very
19 minor amounts of silver ion, if any, are expected
20 to survive the water treatment process in the
21 facility.

22 In the sludge, silver concentrations

1 are estimated to be approximately 20 fold lower
2 than the level required disposal as a toxic waste
3 and any silver that can remain in the water has a
4 final estimated environmental concentration which
5 is below the EPA's national recommended water
6 quality criteria for aquatic life.

7 This is even under worst case
8 assumptions of use.

9 Through our registrations with USEPA
10 and FDA, the human and environmental exposures
11 have been already thoroughly evaluated and
12 considered safe.

13 And finally, while we recognize what
14 you are trying to accomplish by adding the
15 particle size restriction to the listing, we feel
16 strongly that this misrepresents the petition
17 substance.

18 There are no particles in SDC so this
19 disclaimer is confusing and will require users of
20 SDC based products to continually prove that this
21 irrelevant criterion is met.

22 We feel confident that SDC will be a

1 positive addition for organic processors and a
2 good addition to the national list.

3 Thank you for your time and for all of
4 your efforts in the organic program.

5 MR. CHAPMAN: Thank you.

6 I think I'll start with one question
7 and then we can have Steve and maybe we'll
8 actually start with two.

9 So, I want to talk about the nano or
10 ask about the nano pieces that you talked on
11 there. Because we received several public
12 comments about saying that this is nanotechnology
13 and I just kind of want to get to the root of
14 that.

15 Correct me if I'm right in the
16 understanding of your logic. This is not a nano
17 material because it's less than one nanometers
18 and it's not specifically engineered for its
19 size?

20 MS. BLOUNT: Certainly, yes. It is
21 simply ionic silver, so it's atomic in scale.
22 There's silver atoms with citrate ions.

1 Nanoparticles are clusters of silver
2 that are then compounded and capped in order to
3 prevent aggregation. They are maneuvered to not
4 act the way or be the way that a silver ion is in
5 nature.

6 Ours is a silver salt really no
7 different than a silver nitrate which is a
8 balance of ionic silver in an organic solution.

9 MR. CHAPMAN: Okay.

10 We heard from a commenter yesterday
11 about fear of using this and I guess there's EPA
12 restriction about municipalities being notified
13 about waste water containing silver.

14 And the fear that this would be used
15 in locations not on municipal water.

16 Do you have any thoughts or comments
17 on that?

18 MS. BLOUNT: So, the people -- I don't
19 have knowledge of facilities that aren't required
20 to report. The facilities that would use our
21 product either have, you know, waste water
22 treatment facilities in house where what the 95

1 percent, 94 percent of the silver that would be
2 used in our worst case assumptions go to the
3 sludge. Any remaining would be in the water, as
4 I reported before.

5 Those then send out to a publically
6 owned water treatment and they would still have
7 to notify to them if silver was at a level above
8 the EPA concentrations.

9 It's only facilities that then
10 directly export to waters that would have to go
11 under a state permit or an EPA permit.

12 MR. CHAPMAN: I guess that's slightly
13 different. Would a use of this material -- would
14 it be a potential use of this material to wash
15 produce in the field --

16 MS. BLOUNT: No, it is not.

17 MR. CHAPMAN: -- directly after
18 harvest?

19 MS. BLOUNT: No, it is a post-harvest
20 -- it's a processing aid when it's used directly
21 on produce. It's used within processing
22 facilities by definition. It is not a harvest

1 use at all.

2 MR. CHAPMAN: Thank you.

3 Steve?

4 MR. ELA: I guess following up on that
5 a little bit, but I mean, you're talking about
6 approved waste water facilities and
7 municipalities.

8 I mean, for example, our own
9 processing plant, we're on septic system. We
10 don't have a municipal sewer system.

11 So, I'm, you know, I didn't see like
12 as we were talking about this that we needed to
13 annotate it for only for use in processing plants
14 attached with municipal water systems. That
15 really hadn't come up until this discussion.

16 So, how do we -- I mean, is a septic
17 system what you're calling an approved -- I mean,
18 that's -- our county approves that, but it's not
19 really fitting your definition of what you're
20 defining.

21 MS. BLOUNT: My comments were simply
22 to help you understand that there's two levels of

1 regulation for the silver's fate in the end and
2 that primarily the plants that we deal with and
3 the produce processors or the food processors,
4 they don't have to just be produce processors,
5 typically have onsite waste water treatment.

6 In certain areas, we've dealt with
7 poultry processors in investigative use where
8 they may, instead of going to a publically owned
9 work, they may discharge straight to water just
10 because their volumes are so small. But that is
11 under permit.

12 So, I'm sorry if I'm not understanding
13 your question.

14 MS. ELA: Well, I mean so a septic
15 system is somewhere in between the two. It's not
16 straight discharge to water because it goes
17 through a leech field and such. But, yet, it's
18 sort of is.

19 And, I think, I mean, in somebody
20 hearing we've got a product that now you're
21 saying you only sell to these big processors, but
22 when we put it on the list, that doesn't limit it

1 to the big processors.

2 And, I mean, we have to think of the
3 generic broad based, you know, what could happen.
4 And so, how do -- I mean, I'm hearing we need to
5 annotate it much more tightly for who can use it
6 and who can't.

7 MS. BLOUNT: And, I didn't mean to
8 intimate that we only sell to large processors.
9 The evaluations through the environmental impact
10 statement that the FDA made for our -- for the
11 use as a direct food application as a processing
12 aid took into account what happens to that silver
13 waste down the streamline.

14 I highlighted for you the largest
15 ways. I'm not a waste water expert so I don't
16 want to make statements that I can't support
17 other than the fact that the EPA has determined
18 the use as a surface disinfectant and sanitizer
19 and the silver that would end up into waterways
20 through any disposal was not of concern based on
21 their evaluation as well as the FDA's
22 environmental impact statement which is part of

1 the FCN also made that conclusion.

2 MR. ELA: So, would a septic system be
3 okay or not?

4 MS. BLOUNT: Well, so what I know of
5 our product is it is ionic silver which is highly
6 reactive with organic matter. So, when you hit a
7 septic system, it's going to make all of that
8 silver inert. You essentially have an inert form
9 of silver, but it's not going to disrupt that
10 system.

11 MR. ELA: And then, when that tank's
12 pump, you can get notify -- I mean, if it's in
13 the sludge, because you pump septic tanks you
14 then need to notify the municipality that sludge
15 goes to?

16 MS. BLOUNT: I don't have an answer,
17 I'm sorry.

18 MR. CHAPMAN: I've got two follow ups,
19 maybe easier, maybe not.

20 I understand that it's use in relation
21 to fruits and vegetables excludes citrus and
22 grapes for wine making. Do you know why those

1 two crops were excluded?

2 MS. BLOUNT: Sure. When we were going
3 forward, we were looking at the exposure
4 allowance that the FDA had. We also didn't feel
5 that grapes and citrus were a big market for us
6 or a big need for an antimicrobial processing
7 aid. It just wasn't something that we felt was
8 necessary that we needed to fight for.

9 MR. CHAPMAN: Would something with
10 those crops lead to a greater exposure?

11 MS. BLOUNT: No, the exposures were
12 when you do an FCN you say, what are you
13 treating? And, what is, you know, the human
14 eating habits and exposures based on that?

15 What we found in uses that relatively
16 no silver is left on the food after it's treated.
17 When it runs through the processing process, per
18 se, but when you're using a modeled system in
19 order to do this, they have weighted averages
20 based on consumption practices of people.

21 And, that was just some place where we
22 felt that it might take us over a comfortable

1 limit that the FDA might find concerning. So, we
2 didn't include it.

3 MR. CHAPMAN: Okay. And then, we've
4 heard lots of comments about the use of silver in
5 medical uses and concerns around, you know,
6 microbial resistance.

7 Have you heard concerns about this
8 from medical associations, from CDC or other
9 similar regulatory agencies about microbial
10 resistance and the use of this material in
11 agriculture or in food production?

12 MS. BLOUNT: I have heard none. I
13 have heard the comments, you know, that were
14 presented here to this group, but I have not
15 heard specifically, nor has our company heard
16 those same comments.

17 I think that Mark Farina shared
18 comments in webinars with you about microbial
19 resistance and why that's low. Silver has such a
20 broad spectrum of action that it's different than
21 an antibiotic which you take and you ingest and
22 typically are made to have very specific targets

1 in order to kill microbes that makes an easier
2 way for them to grow resistance but with a broad
3 spectrum, silver ions work on the outside of the
4 cell, on the inside of the cell.

5 With SDC, and let me back up, that
6 resistance that they see against silver is simply
7 in a transient mechanism where when silver is
8 present, the cell is able to try to pump the
9 silver out of the cell to mitigate the damage.

10 That costs the cell a lot of energy.
11 It's not sustainable.

12 So, with SDC, the beauty is that the
13 citrate hides the silver. It's able to get on
14 the inside before it's really recognized, before
15 that mechanism is established and it's already
16 killed the microorganism before that pumping
17 action really takes place.

18 MR. CHAPMAN: Thank you. I think
19 that's all the questions, thank you very much.

20 Up next, Alesia Bock and then up last
21 is Marty Mesh.

22 MS. BOCK: Hi, I'm Alesia Bock. I'm

1 with AgriSystems International Consulting Group
2 for organic clients.

3 However, today I'm commenting on my
4 own behalf. After hearing some comments today, I
5 felt the need to provide some information to the
6 Board for your consideration.

7 As a food professional, I've been in
8 the food industry as a quality and R&D
9 professional for almost 30 years and I've been in
10 the organic industry for about 20 years.

11 And, just some comments regarding what
12 you might have heard today. First of all, I
13 wanted to say xanthan gum, while you might have
14 heard that it's not grass, there's some grass
15 information you can self-grass.

16 However, xanthan gum is listed in FDA
17 Part 172 of 21 CFR Subpart G as a food additive
18 directly approved for human consumptions. So,
19 xanthan gum is already listed as approved for
20 human consumption.

21 And, xanthan gum is considered by
22 processors to be an ingredient and as needing to

1 be labeled as such. It's not considered a
2 processing aid or adjuvant. If it's functioning
3 in the finished product, it must be labeled as an
4 ingredient not a processing aid.

5 Number two, even if gums such as
6 xanthan gum are from microbial fermentations from
7 soy, corn or wheat, FDA labeling indicates
8 whether the final ingredient is considered an
9 allergen.

10 Obviously, corn, soy and wheat are
11 allergens. However, gums in this case are non-
12 allergenic.

13 In the case of natural flavors, while
14 I appreciate the need to develop organic flavors
15 and potentially take the category of natural
16 flavors and make them more specific like we did
17 with colors several years ago, I wanted to
18 mention that handlers who use natural flavors,
19 even if they're not organic, must fill out a
20 supplier affidavit from their certifier.

21 And I know because we've done it many
22 times back before I was a consultant, I worked in

1 the food industry. We had to show that those
2 ingredients were not processed using GMO,
3 irradiation or any other prohibited methods.

4 And, some of these flavor affidavits
5 are about three to four pages long. So, they're
6 very in depth.

7 So, to state that these flavors may be
8 from genetic processing for use for organic is
9 incorrect.

10 Finally, and I think I need to channel
11 John who used to always be last in the public
12 comments to increase or maintain the toolbox for
13 processors, I normally deal with handling
14 comments, but for today, I would like to mention
15 that ethylene for farmers, especially organic
16 pineapple farmers, my personal opinion, based on
17 what I heard today, ethylene's been on the list
18 and it's been through Boards several times.

19 It's been sunsetted many times and
20 stays on the list for a reason. And, for those
21 who are using it for organic pineapple farming,
22 even though your marketing, NOSB doesn't take

1 into account the market necessarily for
2 commercial availability, they I think please
3 consider keeping it in the toolbox because
4 converting conventional land to organic, even in
5 the case of pineapples in Costa Rica, I think
6 would be a good thing for the organic industry
7 and consumers.

8 Thank you for your time.

9 MR. CHAPMAN: Thank you.

10 Questions?

11 (No audible response.)

12 MR. CHAPMAN: Thank you.

13 (Off microphone comments.)

14 MR. CHAPMAN: All right, up last is
15 Marty Mesh.

16 MR. MESH: Marty Mesh with Bellevue
17 Gardens Organic Farm, that's the affiliation and
18 that's how I'm here as well as personal comments.

19 For the new Board members, welcome and
20 I started my journey in 1972 as a farm worker in
21 conventional agriculture, in '73 I started
22 growing organic personally.

1 In '76 I started Bellevue Gardens
2 Organic Farm and we shipped a lot of semis of
3 watermelons to California.

4 In '87, I helped start Florida Organic
5 Growers and our certification program now known
6 as Quality Certification Services as well as the
7 nonprofit doing education, advocacy, working on
8 improving food systems, social justice and
9 policy.

10 I've worked on probably six farm bills
11 and gotten some tucked in organic certification
12 cost share in farm bills in the past and other
13 things and we're working on getting, obviously,
14 more money for organic research in it which the
15 research will come in.

16 I'm no longer employed by FOG and QCS
17 but the passion is never going to go away. This
18 is what I've been doing for decades and I'm not
19 stopping now to try to leave the planet better
20 than how I found it, and leave farm land, my
21 soil, better than how I first got it when I
22 inherited it.

1 So, thanks to the National Organic
2 Program and the NOSB for their good work. I
3 served on the Board for two meetings in the
4 rotating certifier regimen before accreditation
5 of the first round.

6 I echo the comments on the national
7 list on the toolbox. You know, I was probably
8 helped be responsible for ethylene in the
9 beginning and I've helped keep it that way.

10 And, I -- really, I mean, if you look
11 at conventional pineapple production and what the
12 small use of ethylene does, i.e., if you look at
13 fatty alcohol, whatever it is, you know, and what
14 that does for people that smoke cigarettes or,
15 you know, being able to choose organic tobacco
16 and the farm workers and farmers that are exposed
17 to all the poisons and stuff, I mean, I've got to
18 say, you know then go after petroleum distill --
19 the petroleum dormant oil.

20 You know, if you're going to take
21 everything out of the toolbox, then go after
22 petroleum dormant oil and see how that works out

1 for the fruit growers.

2 So, you know, the cotton delinting
3 issue that I begged the Board to continue with,
4 that resulted in Farm Aid moving all their cotton
5 to certified organic cotton.

6 So, the difference in acreage on just
7 a little material is really substantial.

8 Michael's comments on tying it to
9 research I thought was helpful and, in fact, you
10 know folks, you know, that I was involved in
11 trying to get an industry wide check off and now
12 we're moving towards a voluntary check off
13 because USDA didn't go to referendum with the
14 check off vote.

15 But, a voluntary check off we hope
16 everybody will be involved in and we'll have
17 public comment opportunity out the first week of
18 November I believe.

19 In 1996, I begged against the listing
20 of sodium nitrate. And, I'm passionate -- ah,
21 shit, man. You know, I do have got a couple -- I
22 do have a couple other comments if there's a

1 question on it, I could give it to you.

2 MR. CHAPMAN: All right, we'll look
3 around. I've got myself first and then --

4 MR. MESH: And then, I did have
5 deferred time --

6 MR. CHAPMAN: Hold on, hold on, I've
7 got a question for you, Marty, first and then
8 we'll see if anyone else has a question for you.

9 I was wondering if you could comment
10 on whether or not you thought Scott's beard was
11 compliant with the system of organic agriculture?

12 (Laughter.)

13 MR. MESH: Yes, I'm not going to --
14 I'm not going there. I had to trim up and shape
15 up, but I think it's fine.

16 MR. CHAPMAN: Do you want to wrap up
17 real briefly?

18 MR. MESH: The seaweed part, as
19 somebody that took their daughter to watch whales
20 when I was working on the Farm Bill in August in
21 policy meetings, and had her and a three-year-old
22 come back and say, dad, you know, the orcas

1 aren't there because there's no salmon because of
2 the habitat destruction.

3 So, I really applaud the effort to
4 look at the sustainability of wild crop
5 harvesting of seaweed and applaud that process.

6 And then, I also echo Laura made the
7 point about a longer comment period. You know, I
8 will try to provide comments and submit comments,
9 but we need more time to do so.

10 MR. CHAPMAN: Thank you, Marty.

11 MR. MESH: And then, also then the
12 last thing, I didn't say was that I support the
13 continuing improvement of organic seed as a
14 farmer that saves seeds for decades and still do,
15 but you know, that continuing improvement process
16 to try to help get more viable seed opportunities
17 for organic farmers to utilize.

18 MR. CHAPMAN: Thank you, thank you,
19 Marty.

20 Any other questions for Marty?
21 Anything beard related?

22 (Laughter.)

1 MR. CHAPMAN: Okay, thank you very
2 much, Marty.

3 MR. MESH: Well, the last thing
4 between me and lunch or you and lunch, so and
5 then, I'm missing a hoodie and I'm from Florida
6 so, it's really cold. If there's a hoodie that
7 somebody finds it's somewhere in this building.

8 (Laughter.)

9 MR. CHAPMAN: All right. If you find
10 a missing hoodie, you can bring it to us and
11 we'll get it to Marty.

12 Yes, Asa?

13 MR. BRADMAN: (off microphone comments)
14 I just wanted to thank you for your comments and
15 the spirit that you bring to the Board and the
16 conversation here.

17 And, I just want to give you a shout
18 out and some applause.

19 (Applause.)

20 MR. MESH: Now Emily's going to take
21 it all back.

22 MR. CHAPMAN: Emily?

1 MS. OAKLEY: This is actually just a
2 comment to all stakeholders that before I joined
3 the NOSB I didn't follow this process very
4 closely. And, everyone always comes up and
5 thanks us for all the work that we do. But, I
6 also thank you for all the time that you take to
7 read all those materials and to provide us with
8 important comments that help us in our work. So,
9 thank you for what you do.

10 (Applause.)

11 MR. CHAPMAN: All right, it's 12:52
12 and we have concluded public comment. I want to
13 thank all the commenters, particularly as
14 mentioned earlier, the delegation that came all
15 the way from Costa Rica.

16 Public comment is vital in this
17 reaching all communities, be it handlers or small
18 farmers and everyone in between. It is vitally
19 important to this process and it's extremely
20 difficult to do that and I really thank folks
21 that go above and beyond to get the message out
22 and get those comments back to us.

1 So, thank you very much and we
2 appreciate everything. And, I think Jenny wants
3 to say something as well.

4 DR. TUCKER: And, I want to thank you,
5 you facilitated that beautifully. There's a lot
6 going on with these public comments and to stay
7 as focused and on point is hard. And so, thank
8 you very, very much.

9 MR. CHAPMAN: Thank you.

10 (Applause.)

11 MR. CHAPMAN: All right, it's still
12 12:52, so we will break until let's call it 2:15.
13 But we're starting right at 2:15 so no wandering
14 in at like 2:20, 2:25, 2:15 we'll start back up
15 with the Materials Subcommittee.

16 (Whereupon, the above-entitled matter
17 went off the record at 12:53 p.m. and resumed at
18 2:21 p.m.)

19 MR. CHAPMAN: We've got all Board
20 members present so we'll come back into order.

21 And first up on our agenda today is
22 Materials. Once concluded, we will either move

1 on to CACS or take a break and then move on to
2 CACS. And, if time allows, we will get started
3 with the Livestock Subcommittee.

4 So at this time, I'm going to hand the
5 meeting over to the Materials Subcommittee Chair,
6 Harriet.

7 MS. BEHAR: Hope everyone had a good
8 lunch and is fortified.

9 Okay, so the first thing I wanted to
10 do is just give you an update on the sanitizer
11 work agenda item. And that is we are moving
12 forward with that.

13 I actually did visit the Ecolab
14 research and development facility on my way up
15 here and made some very good contacts and helping
16 us kind of coalesce into exactly how we're going
17 to do this comprehensive review, what our goals
18 are. And we do have, of course, obviously, the
19 Organic Food Production Act that we are based
20 upon.

21 But to just to let all of you who did
22 mention in public comment about the sanitizer

1 work agenda item that it is not languishing. I
2 won't guarantee that anything will be coming
3 forward at the next meeting, but we are
4 definitely moving forward.

5 So first on our agenda we do have four
6 items in the -- in the Materials Subcommittee
7 research priorities, genetic integrity of seed,
8 excluded methods and -- what's our fourth item?
9 The marine materials.

10 So I will be basically the sandwich in
11 between the two pieces of bread of Emily. And so
12 we'll start out with research priorities and
13 Emily.

14 MS. OAKLEY: All right, this will be a
15 shorter piece of bread. So this is a portion of
16 the NOSB's tasks that have been going on since
17 2012, and we thank the stakeholders for their
18 comments on these priorities.

19 For those who may not be familiar, the
20 Livestock, Crops, Handling and Materials
21 Subcommittees submit their priorities. Over the
22 past couple of years, we've worked on

1 prioritizing previous years' priorities, taking
2 some items off that may not be as important or as
3 significant at the current time and then
4 addressing any new priorities that have come up.

5 So as stakeholders present comments to
6 us for new materials or new research topics, we
7 do take those into consideration. We track them
8 through both the spring and fall meetings,
9 written comments and oral, take them back in each
10 Subcommittee and discuss them. And then
11 additional topics that come up to individual
12 members are also discussed.

13 So I won't review in too much detail
14 those criteria, but they are listed in the
15 proposal. So what I want to do is just discuss
16 those areas that were most significantly
17 addressed by public comment.

18 So in the Livestock Subcommittee, the
19 evaluation of methionine in the context of a
20 system approach in organic poultry production
21 received a significant amount of feedback. And
22 one commenter also suggested that we address the

1 issue that the FDA has now recommended black
2 soldier fly larvae as a poultry feed input and
3 that the Livestock Subcommittee consider
4 requesting a TR on this material as a natural
5 alternative to methionine.

6 Another issue in livestock that also
7 received more attention than others was the
8 organic livestock breeding, especially for
9 outdoor access. One commenter pointed to the
10 University of Guelph's research in this subject.

11 In Crops we did receive, as we have
12 for the past several years, quite a bit of
13 feedback on the biodegradable biobased mulch film
14 topic. A number of stakeholders across the
15 spectrum wrote in about that.

16 The organic no-till also did receive
17 quite a bit of comment, and we did receive a
18 comment to include expanding the scope of this as
19 to whether or not this topic might increase
20 opportunities for carbon sequestration on organic
21 farms.

22 We heard a little bit less about some

1 of the other subjects but did hear a little bit
2 about the disease management, management and
3 control of invasive insects, nutrition in organic
4 crops. And then we did hear some comment on the
5 side-by-side organic input trials that came
6 actually directly from the Crops Subcommittee
7 itself rather than through public comment.

8 Just a caution that we not consider
9 the results from side-by-side trials as
10 sufficient on their own for making policy
11 decisions on the national list.

12 In Handling, celery got some
13 attention, and alternatives to BPA got quite a
14 bit of comment. And I know that that's not an
15 active -- BPA is no longer an active item on the
16 Handling Subcommittee, but it is important to
17 note through public comment that there is quite a
18 bit of interest still within the stakeholder
19 community on this subject and adding -- how do
20 you pronounce that word -- phthalates, thank you,
21 to this work agenda item -- or this, sorry, this
22 research priority as well, so asking for research

1 on that subject as well.

2 Materials, I think the greatest amount
3 of comment came in the integrity of breeding
4 lines and ways of mitigating small amounts of
5 unwanted genetic material, prevention of GMO crop
6 contamination, and the evaluation of
7 effectiveness.

8 In terms of new topics that have come
9 up, we heard about increasing the focus or
10 specificity on soil health, climate change,
11 pathogen prevention, specifically in terms of raw
12 manure intervals that are needed to prevent
13 pathogens, alternatives to fatty alcohols, we've
14 obviously heard that here in this meeting, and it
15 was also in written comments. And then, of
16 course, we heard today, covered agriculture and
17 ecological farmscape practices.

18 I think one thing that wasn't actually
19 mentioned as a specific research priority but
20 came out through some of the public comments from
21 land owners in Maine might be alternatives to
22 some of the seaweed materials. There were

1 definitely comments that alluded to the fact that
2 there are a lot of materials available for input
3 fertilities for organic producers and evaluating
4 maybe the effectiveness of some of the rock weed
5 or kelp materials when other materials might be
6 available.

7 Are there any questions or comments or
8 additions, things I might have missed?

9 All right, I am done.

10 DR. LEWIS: Harriet, can I make a few
11 remarks? Thank you. So I want to, again, thank
12 the Material Subcommittee for working on this
13 issue. Let me just make a few remarks about the
14 research priorities in terms of what we do next
15 with this.

16 So when we get the final document,
17 we'll be sharing this with the National Institute
18 of Food and Agriculture to help them in terms of
19 strategizing, providing direction in terms of
20 research funding, and one of the recommendations
21 that you addressed was for control of fire
22 blight.

1 And recently -- the NIFA recently
2 announced 25 grants that support farmers and
3 ranchers grow and market high-quality organic
4 food, fiber, and other products through the
5 Organic Agriculture Research and Extension
6 Initiative and their Organic Transitions Program.
7 One of the grants that they are funding is
8 optimization of a bacteriophage for managing a
9 fire blight disease. So I just want to at least
10 let you know that in terms of information that
11 you provide for them helps them in terms of their
12 funding, so you can see a direct relation with
13 them.

14 Also appreciate, in terms of one of
15 the -- one of the research priorities dealing
16 with biodegradable biobased mulch. So this is
17 something that we're also going to be looking at
18 as a program, so thank you for raising that and
19 drawing attention also to the public comments
20 that came in in that area.

21 MS. OAKLEY: Harriet, if I may, one
22 more comment. Within the last couple of years

1 we've included the Executive Summary that is
2 largely the document that many people read. They
3 don't read this whole longer discussion of each
4 research priority when the program is presenting
5 this to NIFA and others.

6 We've also discussed on the
7 subcommittee ways of expanding access to these
8 priorities within the academic research community
9 and will be discussing that further in terms of
10 steps that we might take to help increase that.

11 VICE CHAIR BEHAR: And I want to thank
12 the Program for doing the advocacy work and to
13 the other -- to the research -- the place where
14 the money resides for research --

15 DR. LEWIS: Thank you.

16 VICE CHAIR BEHAR: -- and bringing
17 that forward for us. We appreciate that.

18 DR. LEWIS: You're welcome. Thank
19 you.

20 VICE CHAIR BEHAR: Tom?

21 CHAIRMAN CHAPMAN: Yes, two things.
22 One, really appreciate the Program sharing that

1 and all the work on this item. Sometimes,
2 sometimes I feel like we make recommendations and
3 they just go into a black hole. But with these
4 research priorities, like it's great to see that
5 we're setting some priorities, the Program has
6 taken it internally, and funding and other
7 direction is being sent out from that point
8 forward. It's really great to see the influence
9 and the process working here, and this is just --
10 reiterates the strong public/private partnership
11 that the NOSB is meant to facilitate. So I'm
12 happy about that.

13 My other just general comment to
14 people in the audience that are still here is we
15 got a lot of great comments for our research
16 ideas at the fall meeting, which I think we're
17 open to receive great comments on research ideas
18 anywhere, anytime, anyplace.

19 But the most effective location for
20 that is the spring meeting, so if we receive it
21 at the spring meeting, we can review it at the
22 subcommittee level and then bring it forward in

1 the fall. We always publish this in the fall,
2 and so just the spring meeting is a bit more
3 timely.

4 We'll take all the comments, and we'll
5 review it, but you won't see this document again
6 until the 2019 Research Priorities, so getting
7 that in the spring or in the open docket is
8 really the best way to get it timely added to the
9 research priorities.

10 VICE CHAIR BEHAR: Are there any other
11 comments? Well at this time I -- oh, Steve?

12 MR. ELA: Well, I just wanted -- from
13 what you just said, Tom, I think one of the
14 problems we have in the spring is we don't
15 actually put the research priorities out there,
16 so there's not anything to respond to.

17 So I wonder if it would be a good idea
18 on the spring docket just to publish this list
19 again as we put those things out in the packet so
20 people can say oh, this was your list. They can
21 respond and give us feedback of what we should
22 add, and then we can do the updated list in the

1 fall.

2 CHAIRMAN CHAPMAN: That's a great
3 idea. I hope the future Materials chair and lead
4 on this item will take that forward.

5 MS. OAKLEY: And that is a great idea.
6 The only trouble with that idea is that it's
7 sometimes like herding cats to get everybody to
8 have the time to address research priorities
9 within their subcommittees. So we could publish
10 the previous year's, but we would need to make
11 clear that they are not the current year's
12 finalized version.

13 MR. ELA: Yeah, I would just suggest
14 we publish the one we have now and say this was
15 last year's, what should we add or take away. So
16 we get public comment ahead of when we're trying
17 to finalize it.

18 VICE CHAIR BEHAR: I think we want to
19 facilitate as much public input as we can.
20 Anyone else? Okay, at this time I will entertain
21 a motion to -- well, Emily, would you like to --

22 CHAIRMAN CHAPMAN: There's already a

1 motion.

2 VICE CHAIR BEHAR: So we're ready to
3 vote?

4 CHAIRMAN CHAPMAN: Yes, if there's no
5 more discussion. Seeing no more discussion, I
6 think we can move to a vote. So this comes as a
7 seconded motion from the subcommittee. The
8 motion was made by Emily, and it was seconded by
9 myself. And the motion was to adopt the
10 document, which was the 2018 Research Priorities,
11 which is in the agenda that has been previously
12 distributed.

13 Voting will start with Emily and will
14 proceed around the room. This is our first vote,
15 so I'm going to spend a little time explaining
16 it. We've got some new members, and it's been a
17 while.

18 We're going to proceed around the room
19 in order, so starting with Emily, Sue, and then
20 so on. You'll say your vote. The options are
21 yes, no, abstain. Recuse is also an option, but
22 we would have expected recusals at this point.

1 So yes, no, and abstain, and we'll go around the
2 room. Just a note that it switches each time you
3 vote, so the next item we vote on, Sue would
4 start, and it loops around the room, and the
5 Chair always votes last.

6 So on this motion, a yes vote is to
7 adopt the proposal, a no vote is to fail the
8 proposal, and the voting starts with Emily.

9 MS. OAKLEY: Yes.

10 MS. BAIRD: Yes.

11 MR. BUIE: Yes.

12 MS. SWAFFAR: Yes.

13 MR. RICE: Yes.

14 VICE CHAIR BEHAR: Yes.

15 DR. SEITZ: Yes.

16 MR. MORTENSEN: Yes.

17 MR. ELA: Yes.

18 MR. BRADMAN: Yes.

19 DR. GREENWOOD: Yes.

20 MS. DE LIMA: Yes.

21 MR. SCHWARTZ: Yes.

22 MS. ROMERO-BRIONES: Yes.

1 CHAIRMAN CHAPMAN: Chair votes yes.
2 Fifteen yes, the motion passes. Harriet, back to
3 you.

4 VICE CHAIR BEHAR: Okay. The next
5 item is the complicated title of Genetic
6 Integrity Transparency of Seed Grown on Organic
7 Land. This document grew out of what we've been
8 calling Seed Purity for the previous about five
9 documents, and Dan Seitz and Dave Mortensen were
10 my partners on the development of this fairly
11 complicated document.

12 The fact that the docket was late in
13 coming out -- many commenters who gave excellent
14 comments also mentioned that they felt they could
15 have been more thoughtful and probably give even
16 further comments if it went back to subcommittee,
17 and so we on the subcommittee have decided to do
18 that. So we will be bringing it back to
19 subcommittee.

20 However, this is your chance. So we
21 would like to give you until December 7th, that's
22 a Friday, to give us comments on the document as

1 it currently exists. So for those of you who
2 felt that you did not get enough time to give us
3 information, we're not going to give you
4 something new to look at, but you can kind of
5 take a second shot at what we gave you this time
6 around, and then we will bring something forward
7 at the spring meeting.

8 With that said, I do want to kind of
9 go over some of the points that were in the
10 document to kind of let you know what we've heard
11 and what we think we might head forward with and
12 give you some idea of maybe what you want to
13 comment in the future.

14 I want to thank everyone for the
15 almost universal support for the direction that
16 this proposal has taken. It is somewhat
17 different from what we have put forward in the
18 past. It's a difficult issue, and the Materials
19 Subcommittee appreciated all the suggestions, and
20 especially the agreement that this was a good
21 first step.

22 This proposal is meant to aid organic

1 farmers in their choices in seed. There's a
2 growing number of non-GMO farmers who may also
3 need this information. So there are farmers who
4 are not organic who are growing into the non-GMO
5 market who need to know, as well, what is the
6 genetic contamination of the seed that they are
7 using.

8 As just a personal interest, this
9 spring when I came to Washington, D.C. for the
10 OTA fly-in, a group of us visited the new Risk
11 Management Agency Administrator, and he shared
12 with us that his son, who is now taking over the
13 farm, has now started to enter the non-GMO
14 market. So that made me think that this is a
15 larger issue than just for the organic community.
16 The administrator also noted that farmers need
17 multiple market opportunities and help in
18 accessing those markets.

19 So there were quite a few comments
20 about the burden that organic farmers would have
21 under this proposal. I think some of it was
22 maybe not clearly understood, which of course

1 could be the fault of the writer, or just the
2 fact, too, that it was fairly complicated.

3 For farmers who use organic seed, all
4 organic producers would be mandated, under this
5 proposal, to test for presence of genetic
6 contamination, and there were those levels of
7 purity that they could fit into.

8 For farmers who choose to use non-
9 organic seed on organic land, they could ask
10 their seed supplier to provide that information.
11 If that non-organic seed supplier chooses not to,
12 then the farmer would be required to do the
13 testing and provide that in their organic system
14 plan to their certifier.

15 As we heard from one speaker, Jamie
16 Welch from EnviroLogix, this is available. It's
17 publicly available. Farmers could mail samples
18 to a laboratory, and I don't know what they're
19 going to charge, but the baseline cost for them
20 is \$35. So we're not asking farmers to do \$450
21 PCR tests in order meet this proposal. We wanted
22 this to be accessible.

1 And of course, if and when this moves
2 beyond corn -- this is kind of a pilot project
3 just for field corn -- that may not always be the
4 case for every type of commodity that might have
5 a genetically-modified equivalent, but we felt
6 that this -- that's kind of why corn, since it's
7 pervasively tested in the marketplace.

8 The other thing, too, is that if
9 farmers are in a region where there may not be a
10 lot of organic seed available to them, or a lot
11 of other organic farmers, they all know each
12 other. So if they work together buying non-
13 organic seed, they could buy the same lot and
14 share the cost of the testing between them. So
15 in some regions that would maybe help again with
16 the cost.

17 It's a little bit of -- nobody likes
18 to add cost or have to spend more money, but part
19 of it is also, this is a little bit of the
20 medicine that they need to take because they need
21 to know that information, because at the other
22 end, when they grow their crop, there will be

1 people testing.

2 And so if they are trying to get into
3 a market, they need to know what they are
4 starting out with or else they'll go through a
5 whole season of growing an organic crop, and it
6 will be rejected. So that's kind of actually the
7 main purpose of this is to really protect organic
8 farmers so they know what they're getting up
9 front before they even plant.

10 The testing requirements, there were
11 quite a few comments about patents and legal
12 protection on proprietary traits that might be
13 present, so I will do a little bit more, and I'll
14 ask my co-writers to help me with this, on
15 whether or not that testing is prohibited and how
16 difficult this might be.

17 That was a question I can ask Jamie as
18 well, for what kind of traits they are looking
19 for. But I don't think that there is that much
20 in field corn that would be considered
21 proprietary. Most of those proprietary traits
22 are in genetically-modified seed, which would not

1 be allowed to be planted on organic land anyway.

2 As far as violating seed labeling laws
3 by putting the level of purity on the seed tag,
4 we can look at that as well. Perhaps there could
5 be a second tag on the bag, or it's somehow
6 provided up front to the farmer. I would prefer
7 that the farmer would not have to make a phone
8 call and catch somebody. We just want it to be
9 as transparent as possible.

10 As far as there were questions about
11 what is a lot and what are the testing options,
12 we can go into that a little bit more clearly in
13 the proposal next time.

14 The Organic Trade Association had a
15 lot of support for their point that it should
16 have been organized a little better, as far as
17 the 17 items that were part of the proposal, by
18 actually assigning which item needs to be done by
19 which party. What does the organic seed supplier
20 provide? What do they have to do? What does the
21 farmer have to do? So we can do that fairly
22 easily, and we intend to.

1 As far as the level of purity, the
2 seed tester would have the choice of either
3 providing the exact level of purity, or they
4 could be within those categories. It's really a
5 transparency-based proposal.

6 There were comments about whether the
7 traits should be -- it says now all known traits
8 versus commercially-available traits. I
9 understand that the testing would be harder for
10 everything that has ever been put out there, but
11 that was put in there partially because of the
12 experimental genetically-modified wheat that we
13 had problems with in Washington State, and that
14 was not a commercially-available trait, and yet
15 it did cause quite a bit of consternation for
16 farmers when that contamination appeared in their
17 wheat. So I'm not sure how we'll deal with that,
18 but we'll take a look and see if there's any way
19 to capture that or not.

20 Retaining seed samples, there was --
21 for farmers, that -- and I found this kind of
22 interesting that a certifier recommended this,

1 and it was many certifiers then -- other
2 certifiers who didn't like it. But I agree that
3 the farmers should save that sample. We could
4 give some direction on how easy that would be and
5 how much they would have to retain.

6 Again, this is something for the
7 farmers to protect them, so if they find genetic
8 contamination in their final crop, they could go
9 back and verify that level of purity by testing
10 the sample, so they would have kind of a
11 secondary check. Besides the tests that they
12 receive from the supplier, they could then check
13 their own sample. And this would provide
14 information to the farmer whether or not their
15 genetically-modified mitigation efforts are
16 effective or not on their own farm so that they
17 could modify what they are doing.

18 The other thing is about the database.
19 So the database, the purpose to that was to start
20 gaining information about what is the pervasive
21 nature of genetic contamination in the field corn
22 seed supply.

1 And it's not going to be, obviously,
2 everything, but since organic farmers do use a
3 fair amount of non-organic seed, and especially
4 in areas where there are not organic seed
5 suppliers and people especially in the Southeast
6 and the South, we felt that it was important to
7 see -- it would show both hot spots, but it would
8 also show areas where there was a pretty good
9 chance that people could grow seed corn and not
10 have GM contamination. So it would offer seed
11 growers some information about where they could
12 go.

13 I know one seed grower right now is
14 growing out organic seed corn for sale in the
15 United States, and he's doing it in France. So
16 if we can identify some areas in the United
17 States, within our borders, that there's less
18 chance of contamination, that would be good
19 information for them as well, and we could keep
20 that -- yeah, Dave, just -- okay, go ahead.

21 MR. MORTENSEN: Just on that point,
22 which I think is a really important one, you're

1 making the point that it helps us as a community
2 to not only identify hot spots and cold spots --
3 so clean places and less clean places with regard
4 to the germplasm, it also enables us to determine
5 the characteristics of that place that tend to
6 keep it a good place or a place that we need to
7 take some action to see if we can get
8 neighborhood behaviors to change in the farming
9 community.

10 And I think that's a really hopeful
11 thing that could be an outgrowth of this
12 proposal, you know, this way of thinking about
13 the problem, because in my opinion, to date, the
14 whole issue, which a number of our presenters and
15 visitors have presented about co-existence, we
16 really don't understand what co-existence looks
17 like when it's working well, and then I guess
18 we're not co-existing when it's not working well.
19 So I think this helps us get there.

20 VICE CHAIR BEHAR: Thank you, Dave.
21 There were a few that wanted us to have a more
22 clearly-stated purpose and goal. We will do

1 that. Oh, I want to go back to the database.

2 So the last thing with the database,
3 which now we have a little bit more time to
4 discuss with the Program would be who would
5 manage it. And I do have in the proposal that it
6 could possibly even be farmed out. I haven't
7 asked any organization if they want to do it, but
8 I've thought about OMRI, I've thought about a
9 certifier, I've thought about -- I don't know.

10 I don't know who would do it. It
11 could be done internally by the NOP, or it could
12 be farmed out, either one, as far as maintaining
13 the information that all the certifiers are
14 giving of the state or province and country of
15 origin of the seed and what that level of purity
16 was.

17 And I think through that there would
18 be -- it would be anonymous who grew the seed and
19 who planted the seed because the documentation
20 within the certifier can't be FOIAed. That's
21 confidential information, and the only thing that
22 the certifiers are passing on is where the seed

1 was grown and what the level of purity was. And
2 it's by state, so it's not by county.

3 So if you -- you know, it would be
4 Minnesota. I don't think that you could
5 necessarily say that it was any specific farmer
6 or any specific seed grower who grew that in
7 Minnesota and be able to attribute a high level
8 of GM contamination through that database
9 because, again, we want people to feel
10 comfortable in giving the information.

11 Okay, open for discussion. Sue?

12 MS. BAIRD: I really appreciate all
13 the work that's gone into this document. I think
14 that you guys have done a great job of looking at
15 different issues.

16 However, I am a little concerned about
17 the direction. We have been told for 20-plus
18 years that organic certification is a process
19 certification and not a product certification or
20 not based on testing. And if we implement this,
21 we will be moving into a testing of product
22 certification as opposed to process

1 certification.

2 The only place in the regulation that
3 even mentions testing at all is 205.671, when it
4 talks about pesticide residue testing being 5
5 percent above EPA. I love the whole idea of what
6 we're trying to do here. I'm concerned about
7 requiring testing, which is not part of the
8 regulation currently.

9 VICE CHAIR BEHAR: Dave or Tom?

10 MR. MORTENSEN: Yes, thank you, Sue.

11 I think that the whole spirit of the draft is
12 helping the farmer know where they're starting.
13 Because if they don't know where they're
14 starting, meaning seed out of the bag into the
15 planter box, and there are problems on the back
16 end, we have -- this whole idea that we have the
17 capacity to identify patterns of behavior that
18 result in good or bad outcomes is undone by not
19 having that insight.

20 And so this isn't intended to be
21 something where we're coming down on the farmer;
22 rather, enabling the farmer to do what it is

1 they're trying to do, sometimes in places where
2 it's difficult to do that, and then having the
3 information they need to know how to take
4 remedial steps.

5 VICE CHAIR BEHAR: Tom?

6 CHAIRMAN CHAPMAN: Similarly on the
7 cost concern, I was -- I mean most of the
8 comments I received that were somewhat critical
9 of this was the cost burden of the testing, and I
10 was curious to hear from the farmer members, as
11 this would be borne by the farmers, what they
12 thought of those comments.

13 VICE CHAIR BEHAR: Steve?

14 MR. ELA: Grow perennials.

15 (Laughter.)

16 CHAIRMAN CHAPMAN: In your
17 representative role, I think is what I meant.

18 MR. ELA: Like for the corn, I can't
19 really speak to it because we really are so
20 different. But in my head I go okay, this is the
21 pilot case. If it were expanded to represent all
22 organic seeds, I could see, for vegetable

1 growers, where you're buying small lots for a 100
2 row feet or less, that testing requirement could
3 -- that's where it could really add up.

4 Where you're planting 100 acres of
5 something, it's one thing. Where you're planting
6 20 square feet of something, it's a whole
7 different story. So that scalability of the
8 amount of seed you're buying and such, the cost
9 burden could become important.

10 VICE CHAIR BEHAR: Asa?

11 MR. BRADMAN: I just want to follow up
12 with Sue's comment. How would you see this
13 proposal for testing different from requirements
14 to test for pesticides periodically in organic
15 products?

16 Can you hear me now? Okay. How would
17 you see this proposal as being different from
18 testing that's done for pesticide residues in
19 organic produce, and is that a case that also
20 kind of went beyond the process-based versus
21 testing? And I was just curious if you feel like
22 this proposal contradicts those requirements.

1 MS. BAIRD: There are no requirements
2 for producers to test for pesticides. The only
3 time the certifiers are required -- a percentage
4 -- is it five percent of their crops. Is it
5 five, Scott? I think so. Of their clients to
6 test for pesticides, but producers are not
7 required, nor -- I've lost my train of thought.

8 But even so, they do five percent, or
9 they do in case of a complaint. But producers do
10 not required to be tested. And this says every
11 lot has to be tested.

12 MR. BRADMAN: Right, so the
13 distinction here is the producer requirement --

14 MS. BAIRD: Right.

15 MR. BRADMAN: -- versus the certifier.

16 MS. BAIRD: Right.

17 VICE CHAIR BEHAR: Jesse?

18 MR. BUIE: As a small farmer, I'm 100
19 percent organic, so it would not be a factor to
20 me. But I think you said it would be about \$35?

21 VICE CHAIR BEHAR: That's what the
22 cost is to the people who have that testing

1 system in place. I don't know what Iowa State
2 might charge someone. But I would think it would
3 be less than \$100, but probably -- maybe \$50 or
4 something.

5 MR. BUIE: Okay. Is that per batch or
6 --

7 VICE CHAIR BEHAR: Per lot.

8 MR. BUIE: Well, yes. Okay. That's -
9 -

10 VICE CHAIR BEHAR: Okay. Emily?

11 MS. OAKLEY: I mean, I think the
12 question comes down to how many lots would an
13 individual producer have in a given year. I
14 can't imagine it being more than a couple hundred
15 dollars in a season, which is not cost-
16 prohibitive in my view.

17 I have many expenses that are far
18 beyond that. I obviously don't grow grain crops,
19 and we did explicitly exclude vegetable corn, and
20 there aren't very many vegetable crops that would
21 be at risk ever in the future and require any
22 additional testing, so I think it's kind of

1 weighing apples to oranges. But I don't think a
2 couple hundred dollars is of concern.

3 VICE CHAIR BEHAR: Ashley?

4 MS. SWAFFAR: I just want to make sure
5 you guys spell that out really, really clear on
6 those vegetable crops because I'm just thinking
7 on my small, or anybody else's small market farm
8 that -- Emily, you're kind of in my boat. You
9 grow a jillion different things for a variety,
10 and so just please make sure you specify that
11 very, very clearly, because, boy, if we've got to
12 test all the varieties of tomatoes that we grow,
13 boy, that could add up real quick.

14 VICE CHAIR BEHAR: Just to respond to
15 that, it would be at-risk crops that would be
16 under this proposal, so until there becomes --
17 and at-risk would be defined sometime in the
18 future of what can be cross-pollinated easily --
19 I mean, tomatoes don't typically cross-pollinate
20 with others, even right next to them. So that
21 would not be a heavily at-risk crop.

22 Okay. So next is Sue.

1 MS. BAIRD: I'm involved with some
2 non-GMO grain crop growers, specifically corn.
3 They have to test to sell as non-GMO. By the
4 time they do their whole package, it costs about
5 \$125, I think, for the package, and they lot per
6 field and per times of harvest. So it could,
7 depending on how many fields you've got, it could
8 run into thousands of dollars. But non-GMO
9 people do it anyway, so the precedent is there.

10 MR. MORTENSEN: Maybe just -- and I
11 don't know how much time you want to spend on
12 this -- these are the kind of details, getting
13 this feedback and getting it from the
14 stakeholders. It will be extremely valuable.

15 I think we do need to just remind
16 ourselves that we're talking about seed into the
17 planter box, so you could buy a lot in and plant
18 that in five or 10 fields. That's a very typical
19 thing to do in Nebraska, for example.

20 So in that case we're talking about a
21 small sampling on the front end where you may be
22 -- I think -- it would be fairly typical of a

1 grower to have two or three field corn cultivars
2 that they might be buying in. In that case it
3 would be three samples.

4 VICE CHAIR BEHAR: Emily and then
5 Ashley.

6 MS. OAKLEY: I was just going to make
7 that clarification that the proposal says each
8 seed lot, not each field. So the lot is defined
9 by the seed as Dave just explained.

10 VICE CHAIR BEHAR: Ashley?

11 MS. SWAFFAR: Harriet, I just wanted
12 to follow up. When you were asking for the
13 public to comment to the subcommittee by
14 December, you're wanting them to do that through
15 the open docket? Just so that I'm informed that
16 I need to run that by the Program?

17 VICE CHAIR BEHAR: Yes. There will be
18 an open docket, but we don't know exactly when.
19 So we'll be trying to communicate -- I was trying
20 to give the subcommittee enough time and you guys
21 enough time, but the docket may not be open for a
22 few weeks yet, so Tom is going to speak to that.

1 CHAIRMAN CHAPMAN: Yes. The
2 regulatory process released in the docket; the
3 Program does everything they can to get it out as
4 quickly as possible, but there are items beyond
5 their control from date of when it's going to be
6 open is not possible, and so there is a chance,
7 although probably unlikely, that the docket won't
8 be open up until December 7th.

9 I also believe the Government is on a
10 continuing resolution until the 7th. So that's
11 also not particularly good timing, budgetwise, if
12 there's no budget approved for the Federal
13 Government. So we might want to look at, instead
14 of setting a firm date, perhaps a number of weeks
15 after the docket opens to get those comments in.

16 Since folks have the proposal in front
17 of them, they can start working on those
18 comments, and then they just need to submit it to
19 that docket once it opens. So I think a short
20 time after the docket is sufficient, in my
21 opinion, so it's something like two weeks. But
22 I'm looking for the Board to give feedback on

1 that. I see some head-nodding, so --

2 VICE CHAIR BEHAR: Yes. I think --

3 CHAIRMAN CHAPMAN: -- we want to just
4 revise that to say, two weeks. Please provide
5 comments to the open docket within two weeks of
6 its opening so we can have it timely and be able
7 to have the subcommittee be able to make
8 revisions to this as necessary. Does that
9 satisfy -- yes.

10 VICE CHAIR BEHAR: Yes. So everyone
11 is given due notice out there in the audience to
12 start. You have your homework. Tom?

13 CHAIRMAN CHAPMAN: Do folks have a
14 sense of how many public comments we heard from
15 grain farmers who would be most impacted by this?

16 VICE CHAIR BEHAR: Not that many.

17 CHAIRMAN CHAPMAN: Not that --

18 VICE CHAIR BEHAR: Mostly through
19 Organic Valley, and then it was mostly certifiers
20 and grain Organic Seed Alliance, American Seed
21 Trade Association, and some seed suppliers.

22 CHAIRMAN CHAPMAN: Okay. It would be

1 great if, in the interim time period, if members
2 of the public who have contact with grain farmers
3 could try to solicit their feedback on this exact
4 proposal as well, since they would probably be
5 disproportionately impacted by this.

6 VICE CHAIR BEHAR: Personally -- well,
7 this went out to the Organic Farmers Association
8 to OFARM, and I asked them, but they didn't
9 respond. But OFA did.

10 I guess I could go a little bit into
11 the background. In the development of this,
12 Kiki, as I mentioned during the public comment,
13 provided the names of a group of different seed
14 suppliers, both organic and non-organic that
15 service organic farmers.

16 I called all of them and kind of ran
17 the proposal by them and tweaked it according to
18 what works for them, what doesn't work, and
19 trying to be as practical as possible. So it was
20 not really done in a vacuum; it was done mostly
21 with seed growers and the testing community,
22 rather than farmers.

1 More comments? Any other discussion?
2 I would encourage the NOSB as well, not just the
3 Materials Subcommittee, to please read that again
4 and for you all to get us comments on it as well,
5 because it is quite detailed, and it's kind of a
6 different approach.

7 One last thing; there were a few
8 comments about wanting zero tolerance, and that
9 we should have gone towards tolerance, but our
10 regulation does not have that. You could have
11 presence of genetic modification, contamination,
12 in your seed and yet still sell the crop as
13 certified organic.

14 You're not allowed to use genetic
15 engineering intentionally in the production of an
16 organic crop, but if it's there unintentionally
17 you do not lose your certification. So we wanted
18 to kind of stay within those bounds and not set a
19 tolerance level.

20 So with that, we're going back to
21 subcommittee unless there are some more comments.

22 CHAIRMAN CHAPMAN: Do you want me to

1 make a motion?

2 VICE CHAIR BEHAR: Okay. So I'm going
3 to make the motion --

4 CHAIRMAN CHAPMAN: To refer back to
5 subcommittee.

6 MS. OAKLEY: I second.

7 VICE CHAIR BEHAR: Okay, to go back to
8 subcommittee with this.

9 CHAIRMAN CHAPMAN: All right, unless
10 there is further discussion, I'll take it to the
11 voting. Okay.

12 So we have a motion from Harriet and a
13 second from Emily. The motion is to refer the
14 Genetic Integrity Transparency of Seed Grown on
15 Organic Land proposal back to subcommittee.

16 This isn't a matter of business; is
17 should have said this at the start of this item.
18 The Board conducts matters of business by a two-
19 thirds majority vote. This is not a matter of
20 business to refer back to subcommittee and
21 therefore it follows Robert's Rules of Order, and
22 Robert's Rules of Order dictates that an

1 amendment, something to refer back to
2 subcommittee would only require a simple
3 majority. So this is only a simple majority
4 vote; eight votes will send this back.

5 A yes vote would refer this back to
6 subcommittee; a no vote would keep it on our
7 agenda here for further discussion and votes. So
8 the voting starts with Sue.

9 MS. BAIRD: Yes.

10 MR. BUIE: Yes.

11 MS. SWAFFAR: Yes.

12 MR. RICE: Yes.

13 VICE CHAIR BEHAR: Yes.

14 DR. SEITZ: Yes.

15 MR. MORTENSEN: Yes.

16 MR. ELA: Yes.

17 MR. BRADMAN: Yes.

18 DR. GREENWOOD: Yes.

19 MS. DE LIMA: Yes.

20 MR. SCHWARTZ: Yes.

21 MS. ROMERO-BRIONES: Yes.

22 MS. OAKLEY: Yes.

1 CHAIRMAN CHAPMAN: Chair votes yes.

2 MR. RICE: That's 15 yes, zero no.

3 CHAIRMAN CHAPMAN: Fifteen yes, zero
4 no; the motion passes. This is referred back to
5 subcommittee, and I hand the meeting back to
6 Harriet.

7 VICE CHAIR BEHAR: Okay. Michelle?
8 Oh, I have it. Okay. So Excluded Methods
9 Determination, and we put a date on it because
10 this is kind of an ongoing item on our agenda,
11 and we thought that over time, we're going to
12 want to try to keep track of which determinations
13 we had at which time. So going forward we're
14 going to try to have a month and a year on each
15 of these, and it will be called Excluded Method
16 Determinations.

17 So in this is a repeat of the
18 terminology that we passed in the fall of 2016,
19 and the various criteria by which we determine if
20 a method of production would be considered an
21 excluded method, meaning genetic engineering or
22 genetic modification or -- there are many

1 different ways of saying that.

2 And so also included was a chart
3 including everything up to this date that we have
4 determined to be an excluded method. So we'll
5 probably keep doing that just to kind of have a
6 running total so that the most recent document
7 would not just include only the item that we're
8 discussing for this proposal, but would kind of
9 keep all of them in one place to help everyone
10 see where we're at so you wouldn't have to keep
11 going back and looking at previous documents.

12 So we did receive quite a few comments
13 about the transposons with discussion that the
14 naturally-occurring transposons occurred due to
15 drought, heat, or other means of physical stress
16 are not an excluded method. We did have
17 universal agreement on that.

18 For the method transposon produced
19 through chemical, artificial, ultraviolet
20 radiation, or other synthetic stress or
21 interaction, we had quite a bit of non-agreement
22 there, feeling that we needed to separate out the

1 chemical, artificial, ultraviolet light, and put
2 in in vitro transposons -- transposons produced
3 through in vitro manipulation.

4 So that would be into the nuclei; that
5 would be the excluded method, and the chemical,
6 artificial, ultraviolet light and radiation or
7 other synthetics would be to be determined yet,
8 because that is more of an induced mutagenesis
9 system.

10 Also, in further discussion with the
11 Program, transposons are actually the result of a
12 method; they are not actually the method. So we
13 want to take back the transposon part entirely
14 and bring that forward in another document in the
15 spring and separate out those three methods that
16 result in a transposon. For those of you who
17 didn't read that, it's kind of a jumping gene
18 type of change to the genetic makeup of an
19 organism.

20 However, we would like to bring
21 forward for a vote the embryo rescue in plants as
22 a non-excluded method and let that be allowed for

1 use in organic seeds and crops and plants.

2 So I believe Michelle has the change -
3 - thank you, and thank you to Tom for helping
4 with that. So I'd like to open it up for
5 discussion from the --

6 CHAIRMAN CHAPMAN: Can you show the
7 Word document? We just removed references to
8 transposons from the document and added it back
9 to the TBD list, so we'll show that really
10 briefly so folks will understand the entirety of
11 the amendment when it gets requested.

12 It's the Word document. Sorry,
13 Michelle, I can't hear you.

14 VICE CHAIR BEHAR: It's in the table.
15 It's in the Excluded Methods.

16 CHAIRMAN CHAPMAN: If you could just
17 project the Word document, and then we'll scroll
18 through it.

19 VICE CHAIR BEHAR: Okay, while they're
20 looking for that, I hope I explained it. If you
21 don't understand it, this your chance to ask me
22 questions. Any questions on what we're about to

1 do and why we are doing it? Well, if you want to
2 talk about transposons, you can, but it is going
3 back to subcommittee, and it is considered a To
4 Be Determined Material right now.

5 MS. SWAFFAR: I do want to talk about
6 transposons because it relates to livestock. So
7 I think that I learned a lot through this via
8 Harriet on transposons and how vaccines are made.

9 Those people who thought that vaccines
10 were made from excluded methods technically were
11 never made from excluded methods because
12 transposons even though it's a process. It's
13 something -- that's how they're made, and that's
14 why I think it's very critical that our work
15 agenda request for vaccines hopefully be accepted
16 by the Program to put on our work agenda because
17 technically there are no excluded methods for
18 vaccines at this time because transposons are not
19 an excluded method through us.

20 So if we were to -- I was very
21 hesitant to vote on this on transposons because I
22 felt like that was the work-around that the

1 industry had for vaccines at this moment.

2 VICE CHAIR BEHAR: And so we now have
3 some time too, to figure out how those
4 transposons were -- which method was used. Are
5 they in vitro? Are they through chemical or
6 radiation, etc., or are they naturally-occurring
7 transposons? So we'll try to dig a little deeper
8 into how those vaccines are actually made. Good
9 luck. I think, you know, through some of the
10 universities, I think maybe I could get some
11 help.

12 DR. LEWIS: Just a point of
13 clarification for Ashley; in terms of the work
14 agenda request that you submitted to the Program
15 and based on the conversation now, is there any
16 modification that you'd like to make to the work
17 agenda request to address your question?

18 MS. SWAFFAR: No. I think our work
19 agenda request still possibly stands as it is,
20 just because there's a lot of people that have --
21 we're not sure how every vaccine is made, and so
22 there's some made with transposons and possibly

1 other methods. We would just like to address it
2 once and for all for clarity across the industry
3 and across certifiers.

4 DR. LEWIS: Great, thanks for the
5 clarification.

6 VICE CHAIR BEHAR: Just for the
7 public, to remind them that we have asked for a
8 work agenda item to review some work on livestock
9 vaccines that have been produced through excluded
10 methods. Tom, you look like Michelle.

11 CHAIRMAN CHAPMAN: All right, I do.
12 So like we said, so people have some sense of the
13 edits; it's just removing the references to
14 transposons. You'll see when we get to the
15 proposal section that it's limited to discussing
16 embryo rescue of plants, and then you'll see in
17 the TBD section we added the transposons back in
18 there. Then at the end at the actual proposal,
19 it only mentions embryo rescue, not transposons.

20 VICE CHAIR BEHAR: One other item I
21 wanted to bring to the attention of the Board is
22 that we did kind of bring forward items that we

1 would be looking at for the next reiteration of
2 this excluded method determination document,
3 April 2019, and that includes induced mutagenesis
4 which will take into account the transposon
5 method.

6 So we were already planning on that,
7 and I encourage the public too, that if they see
8 items that we don't have on our To Be Determined
9 list that you feel need to be reviewed as
10 excluded or not, to bring them to our attention,
11 because this is a fast-moving area of science,
12 and it's really hard -- a lot of ways to keep
13 track of what could be out there.

14 More discussion? Okay, I will make
15 the motion to remove the transposon information
16 from the document and only include as the
17 proposal part to add embryo rescue in plants
18 should be listed, not an excluded method. Emily?

19 MS. OAKLEY: I'll second.

20 CHAIRMAN CHAPMAN: All right. So we
21 have a motion to amend to remove the mention of
22 transposons from the proposal in the document.

1 So we'll vote first on the motion to amend.
2 That's a simple majority. Then if there's no
3 further discussion we can move to adopt the
4 amended proposal, and that would be a two-thirds
5 vote.

6 So the first vote is to adopt the
7 motion to amend, which is to delete the sections
8 that you saw earlier, as well as delete the
9 transposons section here from the proposal
10 wording. A yes vote is to amend the document and
11 delete the language; a no vote is to retain the
12 original version. The voting will start with
13 Jesse.

14 MR. BUIE: Yes.

15 MS. SWAFFAR: Yes.

16 MR. RICE: Yes.

17 VICE CHAIR BEHAR: Yes.

18 DR. SEITZ: Yes.

19 MR. MORTENSEN: Yes.

20 MR. ELA: Yes.

21 MR. BRADMAN: Yes.

22 DR. GREENWOOD: Yes.

1 MS. DE LIMA: Yes.

2 MR. SCHWARTZ: Yes.

3 MS. ROMERO-BRIONES: Yes.

4 MS. OAKLEY: Yes.

5 MS. BAIRD: Yes.

6 CHAIRMAN CHAPMAN: Chair votes yes.

7 MR. RICE: That's 15 yes, zero no,
8 zero absent.

9 CHAIRMAN CHAPMAN: Motion passes;
10 further discussion? All right. Seeing no
11 further discussion, we'll vote on the main
12 motion. This is a seconded motion that came from
13 the subcommittee. The motion was made by Harriet
14 and seconded by Dan.

15 I'll read the amended proposal, which
16 they say must recommend the NOP add the following
17 table to excluded or non-excluded methods to the
18 NOP excluded methods guidance -- a lot of
19 excluded there. Embryo rescue in plants should
20 be listed not an excluded method.

21 This is a two-thirds majority vote. A
22 yes vote is to adopt this amended proposal, and

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the voting will start with Ashley.

MS. SWAFFAR: Yes.

MR. RICE: Yes.

VICE CHAIR BEHAR: Yes.

DR. SEITZ: Yes.

MR. MORTENSEN: Yes.

MR. ELA: Yes.

MR. BRADMAN: Yes.

DR. GREENWOOD: Yes.

MS. DE LIMA: Yes.

MR. SCHWARTZ: Yes.

MS. ROMERO-BRIONES: Yes.

MS. OAKLEY: Yes.

MS. BAIRD: Yes.

MR. BUIE: Yes.

CHAIRMAN CHAPMAN: Chair votes yes.

MR. RICE: That's 15 yes, zero no,
zero absent.

CHAIRMAN CHAPMAN: The motion passes.

Harriet?

VICE CHAIR BEHAR: Somebody's got work
to do. So I'm going to pass this now to Emily,

1 and she's going to discuss the public comment and
2 the discussion document Marine Materials in
3 Organic Crop Production.

4 MS. OAKLEY: Thanks, Harriet. So I
5 just first want to recognize that this is work
6 that was started by the Board prior to my time
7 and in particular by Dr. Jean Richardson, so
8 thank you very much to her work. A lot of this
9 discussion document took from her original work,
10 so I just want to acknowledge that and thank her.

11 I also just want to say that the
12 reason that we're still working on this issue,
13 even though it's kind of laid out pretty clearly
14 in the discussion document is that this is a long
15 trajectory and that the concern over
16 environmental impact for the harvest of marine
17 macroalgae hasn't gone away. Even though this is
18 a difficult issue to address, the fact that it's
19 hard doesn't mean that we shouldn't try to tackle
20 it.

21 So I will spare you the whole
22 discussion of how we got to where we are, because

1 that's in the discussion document pretty clearly.
2 But what I want to say is that we got unanimous
3 support throughout this process, from when it
4 first came up in 2016 until now, to address the
5 issue of sustainability.

6 What we tackled and tried to address
7 was, what are we talking about when we talk about
8 sustainability in seaweed? And in this case,
9 we're really addressing the environmental impact.

10 So then we discussed, well, how can we
11 address the environmental impact? What tools are
12 available to us? And in the absence of third-
13 party certification that our university agreed
14 upon by both industry, conservationists,
15 producers, consumers, we looked to the tool that
16 we already have at our disposal, which is the
17 wild crop standard.

18 So that's what we did with the
19 discussion document was to put out this really
20 new idea or way of looking at a crop input to see
21 what stakeholders would think, to get their
22 feedback, and to try to be as transparent about

1 our thinking process as possible. We don't
2 assume that it's the only correct way to look at
3 this, or even the correct way, but it's to try to
4 continue this dialogue about how to address this
5 issue.

6 So we basically took the approach of
7 addressing the crop section of this for the time
8 being. I know that some you might remember, but
9 new people might not know this; we did address
10 this also from a handling perspective, and
11 originally it was looking at nomenclature. We
12 decided to try to sort of run a test run through
13 addressing this issue on a more focused scale and
14 crops. And so that's where we are now.

15 I'll give you a little bit from the
16 discussion document, and then I'll summarize some
17 of the public comments, but what I'm really most
18 interested in in this portion of the meeting is
19 hearing from my fellow Board members.

20 I've combed the public comments very
21 carefully and clearly, but what I don't know
22 necessarily is where everyone else stands on this

1 issue, and that will be really important to know
2 as we go forward and try to figure out what the
3 right direction would be to take.

4 So I think the most important thing to
5 note is that what we are trying to do with this
6 when we address the wild crop standard here is to
7 address the environmental impact and not
8 destructive to the environment.

9 We're also looking at the
10 contamination piece of the wild crop standard,
11 but I think what's also critical to note is that
12 marine macroalgae are really different from a
13 lot of other crop inputs, and that they're
14 harvested directly from a wild, native,
15 ecosystem. There really aren't that many other
16 crop inputs that can meet that category. I can
17 think of a few, and some commenters provided some
18 as well, but this is a really unique situation,
19 and I think we've heard from the stakeholders on
20 that.

21 I think the other issue that we
22 realized for so many in this discussion was that

1 the Wild Crop Standard is loose or vague in some
2 of its terms, certainly compared to a crop
3 production standard. And we know that, and we
4 recognize that we would need additional guidance
5 or additional information of help format how such
6 a standard could be applied in a marine
7 environment.

8 There are certifiers who are doing it
9 now, and they're trying to adapt terrestrial
10 standards as best they can to a marine ecosystem,
11 but if we were to move forward in any direction
12 on this, we will definitely need more input on
13 how to do that, and I think that can only be done
14 with experts in the field, producers, and wide
15 group of stakeholders.

16 So just to summarize some of the
17 public comments; there was really a spectrum.
18 There were those who felt that we shouldn't be
19 harvesting all or some types of seaweeds at all
20 for use in crop inputs because those marine
21 environments are so fragile and don't recover
22 quickly. Then there were those who felt that

1 current standards or current government
2 regulations are already sufficient to regulate
3 the industry and their activities.

4 So that's a pretty broad spectrum, but
5 none of those people said we shouldn't address
6 the environmental impact. I think they all
7 recognize the need for that.

8 So I think that in terms of the
9 greatest degree of concern that got brought
10 forward through the public comment, there were
11 two main areas. One was concern that by
12 certifying a crop input ingredient there might be
13 a domino effect of increased scrutiny on other
14 natural crop inputs, where that might lead to the
15 request for certification for many others.

16 So what I'll say first is that we
17 sometimes give a tremendous amount of scrutiny to
18 synthetics that we use, and sometimes those
19 synthetics are found in incredibly small
20 quantities on farms and on fields, and we should
21 give scrutiny. But at the same time, I don't
22 think we want to stop looking at or stop

1 investigating more deeply the natural materials
2 that we apply, sometimes in very large
3 quantities.

4 That being said, the intent of this is
5 not to create a domino effect, and I want to
6 spell that out really clearly. I think the
7 difference here is what I tried to illustrate
8 earlier, that this is an ingredient from a wild,
9 native, ecosystem and it is a very unique
10 situation. It is not the same thing as compost.

11 So I hope that can help assuage some
12 concerns, but another, probably predominant
13 concern was the difficulty of certifiers to
14 verify organic claims since certifying
15 fertilizers was out of NOP's purview.

16 But I think what might have not been
17 clear from the discussion document is that we're
18 not looking to certify the fertilizer. We're
19 looking to certify the ingredient, and in this
20 case seaweed is treated as an agricultural crop,
21 both in livestock and in human consumption.

22 So we're still considering it an

1 agricultural crop, but it's an ingredient that
2 goes into an input. So the input, the product
3 itself, would not be certified, but that
4 ingredient, the agricultural crop of seaweed,
5 we're suggesting would be.

6 We did hear comments from some people
7 thinking that that might not pass the legal
8 muster, the NOP, so I'd really like to find out
9 if that's true and discuss this further with the
10 Program once we go further with this in the
11 Materials Subcommittee.

12 I think it's also important to realize
13 that there are some boats that are currently
14 harvesting, as we've heard from some testimony
15 already, marine macroalgae for the use of
16 livestock feed, and in that case it is already
17 certified to the wild crop standard.

18 In that same boat those same
19 harvesters will then go and harvest the same
20 exact same species for a crop input, and that's
21 not getting certified. So in some cases we have
22 this sort of double standard situation on the

1 exact same species and marine environment, so I
2 think that's part of what we're trying to address
3 here.

4 There are also some products already
5 on the list that do contain certified seaweed
6 ingredients. Now, whether or not -- as we heard
7 from material review organizations, they're going
8 to go then verify that -- we know that it's being
9 done, and I think that if we treated this
10 ingredient itself as the certified input, it
11 would lessen the burden on certifiers and
12 material reviewer organizations because the
13 product would then come with that certification,
14 and presumably would then be searchable on the
15 Organic Integrity Database as well. So there
16 would be multiple ways to check that.

17 So there was some concern expressed
18 that certifiers don't have the skills needed to
19 certify, and unfortunately if that's the case, we
20 already have them doing that work. So we
21 probably need to address that regardless of
22 whether or not we're going to include crop input

1 ingredients in wild crop certification, and I
2 think that some of the certifiers that do do this
3 right now would greatly like to see increased
4 standards or guidance for harvesting seaweed. I
5 think that's something that can be addressed and
6 discussed later.

7 There were suggestions also for third-
8 party certification, and I think we could look to
9 some of those standards like the Marine
10 Stewardship Council, but they're not universally
11 agreed upon. I also wonder if we really have the
12 authority to require a third-party certification.

13 There were suggestions for just
14 annotations within the language in the national
15 list, maybe using some of the wording or even
16 additional wording in the wild crop standard, but
17 not requiring a certification. I think the
18 problem with that that I can see initially is
19 that we don't have a verification process at that
20 point.

21 Then it just becomes an attestation
22 that someone says they're doing what they say

1 they're doing, which is why we ended up
2 continuing to come back to this idea of wild crop
3 certification, because that's why we created
4 organic in the first place, so that we can verify
5 that we are doing what we say we're doing.

6 I think I would be remiss if I just
7 didn't note that there were a number of residents
8 in Maine who wrote in about the impact of
9 harvesting on their lives and their communities
10 and on their property. There were also producers
11 that wrote in saying that they try to make the
12 best case possible for those landowners.

13 But we did have one specific landowner
14 that said -- in the case of rockweed in Maine --
15 they had someone come in an intertidal zone,
16 which we have already heard is up for the old
17 contention -- that they asked the producer to
18 stop harvesting. They did, and then not 18
19 months later another producer came in and was
20 harvesting the same species in the same area. So
21 I think some of those issues could also be
22 addressed potentially through this.

1 People asked for a phase-in period if
2 we were going to do something like this, and I
3 think that's a definite given. They also asked
4 for guidance and additional standards. Some
5 pointed out that terms were used interchangeably
6 in this document, and they were. Initially that
7 was intentional, but I think it would be better
8 if we just start using marine macroalgae and
9 provide some definitions.

10 So just in conclusion, even though
11 this is a new way of looking at a crop input, I
12 don't think that means it's outside of our
13 purview or scope of investigation. I think that
14 the farmers and consumers who rely on us to
15 review materials are depending on us to examine
16 and verify the environmental impact of these
17 materials.

18 I also just want to say that there was
19 widespread support, regardless of anyone's
20 comments, on the creation of a working group, so
21 I will be discussing this with Jennie to see if
22 that's possible. This would be an informal

1 group; it wouldn't be a task force. Anyone would
2 be invited, and I think we'd want a wide range of
3 stakeholders' participation in this to help us
4 scope this issue, decide if wild crop
5 certification might actually be feasible, and if
6 not, what other ways might be better to try to
7 address this.

8 This is a long-term process. This is
9 obviously not something that we're going to
10 figure out in the short term, and it will
11 probably be beyond my term on this board. So
12 some of you new people might want to take it on,
13 just like it was handed to me.

14 So I guess in conclusion, for real, I
15 think that we can find a middle ground. I really
16 don't think we're that far away. I think you can
17 hear from the testimony that there's a lot of
18 consensus on the desire to address this; it's
19 just trying to figure out what is the best means
20 to do that.

21 As I said at the beginning -- I just
22 want to end with that -- even though this is

1 hard, I don't think that means that we can't
2 figure it out. I do think we can. I'm really
3 curious to hear what everybody thinks, and if you
4 have reservations, please share them now, and any
5 thoughts. Thanks.

6 VICE CHAIR BEHAR: Any comments from
7 the Board for Emily? Thank you for all of your -
8 - kind of above and beyond for a landlocked
9 Oklahoman to take the ocean to heart. Steve?

10 MR. ELA: Thanks, Emily. This is one
11 that makes my head swim, pun not intended. I'm
12 trying to work through the wild harvesting in my
13 head, and it comes back that some of these
14 seaweed products are international.

15 I understand we're only USDA, and
16 we're certifying to USDA, but given where some of
17 these products might come from international
18 companies, do you have any thoughts on how we
19 handle that?

20 MS. OAKLEY: Yes, that's a really
21 great question, because if we don't address that,
22 this won't go anywhere.

1 I think my first stop is to look at
2 the OMRI list of products that are out there and
3 maybe try to contact some individual producers of
4 products and see if there are some people that
5 may have contacts with international producers of
6 these materials, and also to get a better sense
7 of how many products are coming internationally
8 versus maybe from the North Atlantic, which where
9 it seems the majority of it might be
10 concentrated; also kind of in the Mediterranean
11 region.

12 I don't know how you pronounce this
13 one, but I'd call it maerl, which is one of the
14 red algae and has probably one of the most clear
15 environmental impacts, because it's achieved
16 through dredging. But yes, I definitely think
17 we've got to look at international users and
18 producers before this would go anywhere.

19 VICE CHAIR BEHAR: Asa?

20 MR. BRADMAN: I actually haven't
21 raised my hand, but I will say that I think this
22 issue is really important. I think it's hard,

1 but we have to deal with it. This can't be
2 ignored. Any situation where we're basically
3 extracting resources from wild environment to put
4 them on a human-manipulated environment, organic
5 or not, it needs to be considered.

6 I'm a little concerned about the wild
7 harvesting criteria. It looks like they're
8 divided a little bit, and you have to either
9 maintain or improve that. I don't get, actually,
10 how the improve aspect of that could apply here.
11 I think if you're taking something out of a wild
12 environment, you're definitely not improving it.
13 But we have to not damage it.

14 I think this is a really hard nut to
15 crack, but I just want to state again, middle
16 ground here, I think what we really want to
17 support is not a middle ground, but we don't want
18 to compromise and sacrifice some zones. We want
19 to come up with some standard that protects it.

20 I actually like the idea of a
21 certified wild-crafted product, and then we have
22 some criteria defining what that is. If we can

1 actually get that through rulemaking, then we
2 have a common understanding of what makes this
3 material legitimate in the organic sector.

4 VICE CHAIR BEHAR: Okay, Steve, and
5 then A-dae. Oh, you want to respond? Steve, A-
6 dae, and then Rick.

7 MS. OAKLEY: Can I quickly respond to
8 that? I think that's a really good point. I
9 think that the reality, though, is that we
10 already have a middle ground, because we have
11 those who don't want to see it harvested at all,
12 and those who think that we need any changes from
13 the status quo.

14 So just in my line of thinking, I
15 don't think either one of those is probably going
16 to be the correct path forward. So when I say a
17 middle ground, I guess I'm trying to say, can we
18 bring those two ends of the spectrum closer
19 together? But I agree, we don't want to
20 compromise marine environments. There will be
21 those who will say that just by allowing it at
22 all, we are. So I just want to put that out

1 there.

2 MR. BRADMAN: Right, and I guess I
3 would be comfortable with not allowing it if we
4 felt like it did compromise environments.

5 VICE CHAIR BEHAR: Okay, back to Steve
6 and then A-dae.

7 MR. ELA: Yes, I'm just following up
8 on my previous comment. This is probably one of
9 those cases where my ignorance is going to show,
10 but are the Europeans -- is there any place we
11 can plagiarize?

12 MS. OAKLEY: Yes, the EU came up and
13 commented, and I'll be looking at that.

14 MS. ROMERO-BRIONES: So can the
15 Program answer the question that you posed them
16 in your summary, which was, "Is this out of the
17 purview of the Board when it comes to
18 ingredients?" Was that your question?

19 MS. OAKLEY: I don't want to make them
20 answer that right now, because I don't know what
21 their answer would be. I want to give them ample
22 time to think about that, unless it's favorable,

1 of course.

2 MS. ROMERO-BRIONES: I asked that
3 because if getting their perspective would help
4 us understand how we need to frame this, and if
5 we're spinning our wheels on something that
6 they're going to immediately reject, that's a
7 consideration.

8 On a more personal note, this issue is
9 very close and dear to my heart. I come from a
10 community that has been harvesting and eating
11 some of the seaweeds that we're talking about for
12 thousands of years. My family just came from
13 harvesting seaweed on the coast for our tribal
14 community in the beginning of this year, and I
15 think that perspective, for sure, has not been
16 articulated at all in these conversations.

17 It's to the point in California where
18 you can actually have physical altercations when
19 it comes to seaweed harvesting along the coast of
20 California, particularly between tribal seaweed
21 gatherers and the organic community where some of
22 these organic products or supposed organic

1 products are being sold in places like the Bay
2 Area.

3 So I think there's a lot of
4 perspectives that need to be considered, and
5 there are grey areas. It makes me really, really
6 sad and emotional to think that some of the
7 traditional foods that have sustained tribal
8 communities for a thousand years are being used
9 as fertilizer or cow feed, particularly because
10 some of these tribal communities face some of the
11 highest insecurity rates in this country, and
12 when it comes to winter months, seaweed is a
13 pretty important food staple for a lot of hungry
14 families.

15 I haven't quite gotten to the point
16 where I'm comfortable with having wild food
17 labeled organic under the Wild Food Provision, so
18 at this point I'm really opposed to moving
19 forward on anything until we get those
20 perspectives on the table.

21 VICE CHAIR BEHAR: Rick was next, then
22 Sue, then Tom, and then Emily.

1 DR. GREENWOOD: Remember yesterday I
2 asked the question about quantity of kelp that
3 was harvested versus organic versus conventional,
4 and I think when we look at this whole area, we
5 need to make sure that we have a wide range of
6 harvesters that include the conventional people,
7 because they probably have practices that are
8 incompatible with what we're looking for.

9 I know we don't have jurisdiction, but
10 I think we need their input when we come up with
11 something. I'd hate to have us come up with
12 something that's very good, and then meanwhile
13 you go down to the ocean and there's other people
14 destroying the kelp beds. So if we can do it in
15 a way that would cover that whole area of
16 harvesting, I think it would be very beneficial.

17 VICE CHAIR BEHAR: So it -- does the
18 Program want to -- then Sue.

19 DR. GREENWOOD: Can I just make one
20 remark? Just in terms of the Program's
21 perspective on this, one thing to take into
22 account is -- and we've been talking about this

1 in the executive committee and also here at the
2 meeting in the beginning, was thinking about the
3 Program's role and our engagement with the
4 federal partners.

5 And when I think about this activity
6 obviously it means being engaged with NOAA in
7 terms of what NOAA's responsibilities are in
8 terms of their Fisheries management and other
9 factors. So one thing to think as you work
10 through this issue is the relationship with NOAA
11 in terms of their regulatory authority in this
12 matter.

13 VICE CHAIR BEHAR: Sue?

14 MS. BAIRD: I appreciate A-dae's
15 perspective; I had not thought about that. I
16 like the idea of moving into wild crops harvest
17 as opposed to crops. There's a definite
18 difference in wild crops, which means you don't
19 add any inputs; you do no management of it. You
20 just harvest it. Crops, you have that management
21 practice.

22 I've done inspections for wild crop

1 harvesting for a few certifiers. There's not a
2 whole lot of certifiers out there that do wild
3 crop harvesting. Some do a much better job of
4 defining criteria to preserve the natural culture
5 of that crop than do others.

6 I find it interesting -- and you were
7 asking, could we plagiarize some -- FairWild is
8 an organization that certifies wild crop
9 harvesting, and in fact, NOP has recognized
10 FairWild's standards as meeting our standards,
11 the organic wild crop harvesting standards. It's
12 based on risk assessment; what practices are you
13 implementing that will preserve that colony of
14 wild crops?

15 So I agree we've got to do something.
16 We've got to do something to address the
17 sustainability of our natural habitats; food
18 habitats, whether it's food or fertilizer,
19 whatever we use it for; we have to preserve it,
20 and the only way we can do that is some kind of
21 regulatory action.

22 Wild crops is where it fits; it

1 doesn't fit in crop production, because we're not
2 doing production practices. Just my take on it.

3 VICE CHAIR BEHAR: Emily?

4 MS. OAKLEY: I just wanted to respond
5 to A-dae and say that we should discuss how best
6 to incorporate and approach and include tribal
7 communities. I completely agree with that
8 perspective, and I think it's incredibly painful
9 to see that collision of perspectives, and I hope
10 we can try to address some of that, at least in
11 this discussion document. Thank you.

12 VICE CHAIR BEHAR: Any other comments?
13 Dave?

14 MR. MORTENSEN: I think this work that
15 you're spearheading here, Emily, underscores that
16 our foodshed is much larger than the fields and
17 the farms that we farm. If we follow the logic,
18 if we're internally consistent, at our very last
19 meeting we voted to protect ecosystems of high
20 integrity or not recently-disturbed, for the
21 purposes of enhancing ecosystem services.

22 It seems to me this is -- I mean, how

1 can we not do this if we vote in favor of
2 protecting the environment ecosystems and
3 ecosystem integrity and services? I agree with
4 you that A-dae's points were really moving and
5 definitely need to be in this.

6 I moved to New Hampshire two months
7 ago. I would say every other morning on public
8 radio there's at least a 10-minute piece on the
9 declining fisheries in the North Atlantic;
10 haddock, cod. The size distribution of lobsters
11 has shifted to very small lobsters. It's
12 affecting catch. Native American peoples, but
13 mostly European peoples in the Northeast.

14 So this whole thing is interconnected
15 deeply. I think we all know that, and when we
16 start taking things out of an already depleted
17 ecosystem, we certainly have to be concerned
18 about that. So I applaud you for pursuing this,
19 and it seems to me to be entirely consistent with
20 what we've been working on since I got on the
21 board.

22 VICE CHAIR BEHAR: Okay. I think

1 we're going to wrap that up, and I want to just
2 echo what Dave said. We're the terrestrial
3 world, and the marine world, and we're very
4 connected. The oceans are the vast majority of
5 the coverage of our planet, so we need to be part
6 of the stewardship of that as well.

7 So with that, the Materials
8 Subcommittee will come to a close, and we've
9 eaten our sandwich.

10 CHAIRMAN CHAPMAN: All right. So up
11 next is CACS. What time is it? It is 3:52, so
12 we will take a brief break and come back at 4:10
13 and start up with the CACS. I want to thank
14 Harriet for taking us through the Materials
15 Subcommittee. We're in recess, and we'll be back
16 at 4:10.

17 (Whereupon, the above-entitled matter
18 went off the record at 3:52 p.m. and resumed at
19 4:11 p.m.)

20 MR. CHAPMAN: It looks like we have 12
21 members present, so that's enough to call it a
22 quorum. And we'll come back into session, so up

1 next on the agenda is the Compliance,
2 Accreditation, & Certification Subcommittee
3 chaired by Scott Rice.

4 I will hand the meeting over to Scott
5 in a second. I just remind him it's, what time
6 is it? 4:10. And if we do have time, we would
7 like to get to the livestock sections.

8 So just warning you to, you know,
9 track yourself, check that beard to make sure
10 that beard might not want to talk too much just
11 so we can move along.

12 MR. RICE: Okay, we did a lot of work
13 on the CACS this year, it's been defined by the
14 focus of the program and the community on
15 integrity of the organic supply chain.

16 There's been a lot of discussion on
17 that both about domestic and international supply
18 chains. Had a lot of comprehensive and detailed
19 discussion in a number of areas that integrity
20 touches on.

21 And that's to say every corner of
22 organic trade certification and accreditation.

1 So you'll recall a lot of panel discussions and
2 public comments, discussion amongst the Board,
3 written comment.

4 It's truly been great, and I thank
5 everyone for their input. We've focused on about
6 the last year on inspector and reviewer
7 qualifications in training. And also assessing
8 risk when addressing accreditation oversight.

9 So the first, taking a look at what
10 we're looking at today. We've got a proposal on
11 risk criteria for accreditation oversight as well
12 as training and oversight of inspector and
13 certification reviewer personnel.

14 And we're going to get a sneak peek of
15 the LMS system or the Organic Integrity Learning
16 System. Is that really it? The OLLS, the
17 Organic Integrity Learning System now, is that
18 what we're? All right.

19 And a verbal update from Tom on the
20 feedback that we saw from the spring 2018 work
21 and panel. So as we dive in here.

22 Looking at risk criteria for

1 accreditation oversight in early this year the
2 NOP requested that the NOSB provide input on the
3 factors that contribute to an accredited
4 certifier having a higher risk of fraud and that
5 either within its organization or the operation
6 that it certifies.

7 We're looking to establish that
8 criteria for assessing the factors when engaging
9 in the oversight. And that oversight includes
10 onsite visits as well as desk audit activities of
11 the certifier in both their primary and satellite
12 offices for those that have those offsite
13 facilities or locations rather.

14 And as I said we received a wealth of
15 information that informed us and in the most
16 recent public comment period solicited some ideas
17 for additional criteria that were not considered
18 in this.

19 And again, received some really great
20 feedback. And so I was going to summarize some
21 of the comments that we heard as well as some of
22 those additional criteria points.

1 We did, excuse me, we presented this
2 as an unranked list, but many commenters
3 suggested that the list really should be ranked
4 based on the level or degree of risk that is
5 seen.

6 Further commenters pointed to the
7 importance of developing a scorecard or a risk
8 matrix to group and rank risk behaviors. And/or
9 consider a category of probability or likelihood
10 against a category of consequence severity.

11 Commenters also pointed to the
12 importance of looking at these factors
13 proactively and how certifiers implemented
14 mitigations to address them before issues arise.
15 So that we're not just reacting to the things
16 that we find in an auditor.

17 Commenters strongly advised
18 prioritizing required data reporting,
19 specifically aggregate acreage data. And as we
20 heard in other discussions today, data is
21 continually coming up as an important piece of
22 integrity and ensuring that we have the most

1 comprehensive data will help in all of our
2 efforts.

3 In relation to the data reporting,
4 it's suggested that overseas certifiers be
5 directed to work with domestic certifiers to send
6 the information requested by certifiers here to
7 confirm data that may not necessarily be
8 available in the Organic Integrity Database.

9 We've heard about some challenges in
10 that communications were either long response
11 times or no response. It's suggested that the
12 certifiers be directed by NOP to respond to that
13 information request.

14 One comment noted that instead of
15 focusing on the number or lack of positive
16 residue sampling results to focus on the sampling
17 system in place to ensure it's sufficient and
18 meeting the requirements as set out by the NOP.

19 Other commenters wished to see greater
20 detail in the risk mitigation actions and when
21 outcomes of those measures would warrant a non-
22 compliance or prevent a certifier from gaining

1 initial accreditation.

2 Just to point out again the intent
3 when drafting those various response steps was
4 that any findings would be evaluated and
5 responded to as other findings would in an audit.

6 Which depending on what is found may
7 include non-compliance action or adverse action
8 when it's deemed necessary.

9 And commenters suggested a greater
10 detail of definitions, well, greater detail in
11 definitions for some of the terms used so that
12 the risk factors may be applied equally and
13 objectively.

14 And on a similar note, looking to have
15 a better understanding of what say average means
16 when it comes to risk factors such as residue
17 samples or number of non-compliances issued.

18 This relates again to the overall
19 importance of accessibility to the data and that
20 there's a common baseline of understanding and
21 common access to the data.

22 Regarding risk factors on reporting

1 that data to the Organic Integrity Database there
2 were some comments that did not feel reporting
3 the minimum data required should be considered a
4 risk factor for a couple of reasons.

5 One being that the certifier would be
6 meeting the requirements, if not the minimal, as
7 well as the fact that the database is still
8 relatively new.

9 Certifiers are continuing to update
10 their systems and are also cautious about not
11 wishing to disclose confidential business
12 information.

13 Again, I think some of those
14 challenges can be addressed through aggregate
15 data, and I think we're seeing that already.

16 Some commenters wanted clarification
17 on what a breakdown in a control system is or
18 looks like. There's general support for greater
19 scrutiny during certification audits.

20 Concern was expressed regarding the
21 cost of those longer, more detailed, deep dive
22 audits, more intense audits, and that that cost

1 should be born at least, in part, by USDA.

2 Right now we as certifiers receive a
3 bill for those services and it's a hefty one no
4 matter the size of the certifier.

5 Something that I think we're happy to
6 have happen and respect the work that NOP puts
7 into that but the more that we start looking at
8 other or additional factors and the longer those
9 audits are there's definitely, I can see a
10 tipping point, as some pointed out.

11 Finally, there was some concern
12 expressed about the identification of one risk
13 factor as the sign of potential fraud. And just
14 to reiterate this was a list intended as a guide
15 to looking at areas that have been noted as risk.

16 It's not the intention for the
17 presence of one to automatically trigger greater
18 scrutiny again pointing back to that initial idea
19 of ranking this, of creating some sort of matrix.

20 We heard some from some folks the last
21 couple days of examples of how they've
22 incorporated that into their systems. And invite

1 those folks to share some of those models in the
2 public docket.

3 And a number of commenters noting a
4 holistic systems-based approach is essential when
5 evaluating risk. So lots of, again, really good,
6 really good feedback and then diving into
7 specifically some of those comments speaking to
8 additional criteria that we may have overlooked
9 in the first round.

10 Some suggested adding that a certifier
11 providing service to an operation that employs a
12 former member of the certifier staff or a
13 certifier hiring or seeking advice or in an
14 advisory capacity or consultancy services from
15 someone who's previously employed by an operation
16 that certifies or alternatively a certifier
17 engaging with a formal, former rather USDA
18 employee.

19 There might be something like a
20 cooling off period or some expectation that there
21 would be a separation of time to avoid any real
22 or perceived conflicts.

1 Another suggestion if a certifier
2 misses one or more of the NOP annual trainings,
3 NOSB meetings were also noted, that specific to
4 the annual trainings that NOP include an
5 evaluation of whether the appropriate staff were
6 in attendance at the training.

7 And an evaluation of whether the
8 information received at the training is
9 adequately disseminated to certifier and
10 inspector personnel.

11 We do see a really good turnout at
12 those annual NOP trainings. And it's an
13 excellent opportunity for that community to
14 exchange ideas and strategies but it would be
15 great to get to a 100 percent on that.

16 Another idea of including a greater
17 specificity in the criteria regarding
18 requirements specific to dairy management. That
19 would be training and creating dairy-specific
20 risk factors.

21 Another suggestion of program review
22 or internal audit if USDA sees that those audit

1 reports contain major non-compliances or a
2 significant number of minor non-compliances.
3 That might trigger a closer look at what's going
4 on there.

5 Another risk factor might be failure
6 to implement and maintain internal procedures
7 supporting the stability of the certification
8 agency.

9 This again speaks to that overall
10 control or quality system that should be in place
11 if something like that is seen perhaps more
12 emphasis is needed on verifying the health of
13 other parts of the certifier's quality system to
14 ensure that the full range of the certifier's
15 procedures are robust enough to handle the
16 present capacity as well as future growth.

17 That kind of ties into another
18 suggested a surge in applications for
19 certification could potentially be a risk if
20 there's a lack of resources to keep up with that
21 demand for services.

22 And sort of be the flip side of that

1 is a drop could suggest the presence of a system
2 that is inadequate at providing the necessary
3 services to maintain a healthy control system.

4 Let's see here. There were other
5 areas of feedback that didn't necessarily fall
6 into the column of a risk factor per se and
7 thought it worthwhile to mention here.

8 One being a suggestion that NOP
9 improve the process by which it engages in peer
10 reviews. Heard some public comments on that
11 pointing to several aspects of what those peer
12 reviews look like in terms of qualifications of
13 staff or if those involved what their respective
14 expertise is.

15 Looking at strength in oversight and
16 response to the import of organic grain. That's,
17 of course, something that we've heard about in
18 general quite a bit.

19 In frequent communication with the
20 U.S. Customs and Border Patrol ACE System to
21 provide more standardized, detailed info on
22 organic products. We heard from the program on

1 efforts already underway to address that.

2 And strengthening and making
3 consistent the process by which certifiers engage
4 in those internal reviews and following up on
5 their findings. And more closer look at kind of
6 getting those processes or expectations more even
7 across the board.

8 I know that we've seen a good
9 flexibility, or enjoyed flexibility in how we
10 approach those internal audits. Whether it's
11 done by the program itself or an outside auditor,
12 having that flexibility is still important. But
13 having some common expectations of what that
14 audit looks at would be a worthwhile focus.

15 And finally, the NOP should
16 incorporate risk-based accreditation into the
17 equivalency agreements that they engage in so
18 that foreign certifiers are held at the same
19 scrutiny that our domestic certifiers here the
20 U.S. are.

21 And moving on from that, you know, as
22 we heard in a lot of comments. There's an

1 interest in continuing to engage in this process
2 and that this is not a finite list.

3 This is not a finite process, so we
4 don't hand it off, and it just disappears. So
5 looking to continue to be engaged and have this
6 be more of a living document or a living process
7 and would invite the program just to comment on
8 perhaps how they see that best operating.

9 And the criteria, any thoughts on the
10 criteria itself and just an opportunity for
11 feedback there. Yes, sure.

12 DR. TUCKER: So I would say generally
13 I want to just overall thank and appreciate all
14 the thought that has come into this. I think I
15 shared yesterday when we were looking at
16 priorities for moving forward.

17 Inspector qualifications and training
18 is incredibly key. Risk-based oversight is
19 incredibly key, and technology is incredibly key.
20 And all three of those variables have been sort
21 of folded nicely into this set of work from both
22 the Board and the public comments.

1 I'm intrigued with that as I do
2 additional research on how other industries are
3 implementing risk-based oversight. So much of it
4 comes back to personnel. The personnel is always
5 at the core of any risk-based system.

6 Which, you know, when you stop and
7 think about actually really make sense. But to
8 have it be that overt as your personnel is your
9 risk is I think clarifying.

10 And so I think the way that the
11 proposal was crafted and thoughtfulness of the
12 comments are very much appreciated.

13 We are looking in terms of our
14 accreditation and international activities group
15 how do we think about certifier audits in a
16 different way, in a risk-based approach that's
17 still consistent under the regulations?

18 So we need a system that is again hi-
19 fidelity to the regs while also reflecting kind
20 of the world and environment we're in.

21 I think I mentioned that we have a new
22 staff member with a lot of skill in risk-based

1 thinking, economics, and a really good eye for
2 all the different international resources that
3 are available for assessing risk which has been
4 very eye-opening and helpful.

5 In terms of the equivalency
6 arrangements, there is a group of countries that
7 comes together on a regular basis as a working
8 group. And so there's a meeting in December
9 where we'll be talking about some of these issues
10 and how all of us can work together.

11 Those conversations on risk-based have
12 already begun in terms of both where there are
13 sort of high risks how we collaborate. I think
14 the enforcement collaboration, in particular, is
15 really improved over the past couple of years.

16 Also, I think one of the risks in
17 talking about risk-based oversight is that you
18 have to remember that you can add all sorts of
19 things at high risk but that means you also just
20 from a resources perspective, you have to
21 identify what the low risk is and what that
22 means.

1 And then how you would detect a red
2 flag at low risk that would elevate it in high
3 risk. So you end up having enough of a
4 monitoring system. But we do need to work both
5 sides of the spectrum here, and so that's sort of
6 the holistic.

7 You can't just concentrate on doing
8 more, more, more at the top. You also have to
9 think about, okay, well what does that mean we're
10 not going to do as a result in order to
11 reallocate resources responsibly while still
12 having a red-flag system?

13 So this is going to take a little bit
14 of time and some experimentation, but we're
15 already taking steps in terms of introducing, for
16 example, unannounced inspections not only of
17 operations but we've had a couple of unannounced
18 visits with certifiers, and so I think continuing
19 that element of it.

20 So that's my overarching reaction to
21 this work. Again, I'm very, very grateful for
22 the comments and insight from the community as

1 well as the Board, so thank you.

2 MR. RICE: Thanks, Jenny. Appreciate
3 the feedback and insight on how the program's
4 tackling this. I wanted to open up to discussion
5 and any questions or comments from board members
6 on this. Emily.

7 MS. OAKLEY: This is back to your
8 question I guess to the program to how we can use
9 this document as a living document? It kind of
10 reminds me to some extent the excluded methods
11 process that we're working through.

12 So do you have thoughts or does the
13 program have thoughts on how we can, you know,
14 pass what we've got before but continue to work
15 on it, especially on the couple of comments we
16 got?

17 MR. RICE: Yes, I'm not quite sure. I
18 think having that ability to have the open docket
19 for the community to continue to weigh in but
20 having a way to capture that similar to that
21 excluded methods process would be helpful too so
22 that we're all on the same page and can see in a

1 centralized fashion where the thought process is
2 and where the action is.

3 I don't know if Jenny, you want to add
4 anything to that or thoughts on how process-wise
5 we can do that?

6 DR. TUCKER: I would love to have this
7 be sort of an ongoing conversation so whether
8 that means there's sort of a living document and
9 sort of an artifact that collects that ongoing
10 conversation. I'm open to that.

11 I think there does come a point at
12 which there are going to be some things that we
13 do from a risk-based oversight perspective that
14 perhaps we don't publish because, you know, at
15 some point you want to be able to do some of this
16 and have it be at least a little bit of a
17 surprise.

18 So isn't, you know, by the way, we're
19 going to come in look at drawer one, four, and
20 five of your, you know. And so I think there is
21 when we're looking at risk-based oversight a real
22 balance between transparency, openness in the

1 process.

2 We always want the process to be fair,
3 and so I think openness and transparency supports
4 fairness. And also sometimes when you're, you
5 know, playing poker there are times when you're
6 not showing your hand. And so that is part of
7 it.

8 Sorry, somebody brought up a poker
9 reference earlier in the meeting, so I'm feeling
10 the need to extend that metaphor a little bit.

11 MR. RICE: It's better than a beard.
12 Tom.

13 MR. CHAPMAN: Sometimes you hold them,
14 and sometimes you share them, all right, my
15 memory of the song "The Joker" is not that great.

16 A couple of things on this that I've
17 been thinking about. One, is we all have
18 opinions on the risks that are out there in the
19 accreditation field.

20 And we got the public comments; the
21 committee put them out in this document. But we
22 also have to respect the fact that the people

1 doing accreditation, running an accreditation
2 program also have a perspective and an experience
3 that also needs to be weighed in on this.

4 And so our own opinions may not be the
5 only opinions that matter on this. That being
6 said, the other thing we need to keep in mind is
7 the difference between all potential risks and
8 the minimum amount to accurately segment the
9 certifiers into high, medium, and low risk.

10 And you may not need to identify all
11 risks to be able to appropriately segment into
12 high, medium, and low. We did get some comments
13 from certifiers that I wasn't particularly a fan
14 of.

15 But everyone's entitled to their
16 opinion around, you know, assigning high risk to
17 minimum requirements as an example. And if you
18 hit the minimum requirements that should subject
19 you to a higher risk rating and I cannot disagree
20 with that more.

21 Risk doesn't mean that you're non-
22 compliant. Risk just means that there's the

1 potential for an issue there. There's risk,
2 there's opportunity, and it needs to be evaluated
3 further.

4 So that's a couple things to keep in
5 mind. How I would like to see us move forward on
6 this in my own mind is I'd love the program to go
7 and take back these factors knowing the resources
8 that they have, the capabilities.

9 The programs that are already in place
10 and the processes, see how they interact with how
11 they run their accreditation programs and then
12 come back to us in a period of time to give us
13 feedback on what of these 13 criteria were
14 useful.

15 Which ones they're looking to
16 incorporate or have already incorporated and how
17 they're going about managing that risk. Or
18 whether they may have additional questions and
19 then that's how we can continue this conversation
20 forward.

21 But to some degree, this document
22 needs to be internalized by the National Organic

1 Program and turned into a Risk Management Program
2 for accreditation. And unfortunately, we're not
3 the ones to be able to write that in its full
4 detail.

5 The other comment I just want to make
6 from opinion and I don't know if others of that
7 committee had a different opinion. We chose not
8 to rank these items, that's not to say that they
9 shouldn't be ranked.

10 But again it was to kind of respect
11 that we were trying to identify risk factors.
12 But of course, some risk factors may weigh more
13 than other risk factors than those.

14 And I'd hope that the program would
15 take that into account as they have, you know,
16 this special insight of what they see when they
17 go out and do these accreditation audits.

18 And the impact of certain risk factors
19 have on their assessment of certifiers. I think
20 at that point a weighting of these would be quite
21 appropriate for them to implement in their own
22 program.

1 As another avenue forward and as part
2 of the public comment, we received information
3 about risk assessments and certification of
4 clients. And I also could see that as an area of
5 us continuing and expanding those conversations.

6 To take a further look into risk
7 factors with clients and making a similar
8 document that we would recommend into certifiers
9 to be able to take a more holistic approach and
10 identify general risk factors that should
11 highlight and segment their clientele for greater
12 or less scrutiny.

13 MR. RICE: Thank, Tom. I've got Rick,
14 Emily, Harriet, and Dave.

15 DR. GREENWOOD: Question actually for
16 Jenny and Paul. I assume you have historical
17 data where you should be able to rank these, and
18 I guess the question we need to think about too
19 is, are we talking about financial risk or
20 reputational risk?

21 I mean there's all kinds of risk and
22 so I'm just wondering taking these 13 items will

1 you be able to sort of do that and give us
2 feedback in terms of what's the riskiest and what
3 you think the risk is?

4 DR. TUCKER: I think, so over, I think
5 we still have some learning to do. That's how I
6 think I would respond to that. I think we have
7 over the past three years had, maybe three or
8 four years.

9 We've had simply because of sort of
10 transitions in career and other variable we've
11 had almost 100 percent turnover in our
12 accreditation and international activities
13 division.

14 We are at a point right now where we
15 have the strongest accreditation team that we
16 have ever had. I mean, that's natural in an
17 organization to build over time.

18 And it does mean that the quality of
19 the detection they're able to do now at a
20 system's level is much more robust. And so we
21 need a bit of time to be able to get more audits
22 done at that level of assessment before I'm going

1 to feel comfortable that we're even able to rank
2 these.

3 Now some of these jump out as, yes,
4 absolutely. And so, I mean honestly, number 11
5 seems like a big one. Right? If you have an
6 open, it takes a lot to get a proposed suspension
7 or proposed revocation or to have another
8 government kick you out of their system. Right?

9 So that one, yes, right, that's a big
10 one. Other ones are interesting in terms of how
11 you would actually then translate it into some
12 kind of quantitatively fair assessment. We need
13 a little bit more time to think through that.
14 That's it.

15 DR. GREENWOOD: You think about risk,
16 and there's, risk isn't one word, really. I mean
17 it's the whole thing. You think about Chipotle
18 and food poisoning, and it was reputational risk
19 and financial risk. So you have to sort of parse
20 it out to see what you're really looking for.

21 DR. TUCKER: Yes, reputational harm is
22 certainly part of it, and certainly I think the

1 case studies for that are very clear in imports
2 in dairy. Right?

3 And so those highlight very specific
4 parts or sectors of the market. They both have a
5 high market impact in term of financial impact,
6 but also just reputationally that's, you know,
7 consumers get those things.

8 And so, yes, reputational harm is part
9 of that. How do you translate that into how
10 you're looking at a particular certifier and then
11 again to do like a proposed suspension or
12 revocation you also have to have a lot of
13 evidence against very specific citations.

14 So the risk-based model might help you
15 see where to look but it really also comes down
16 to do you actually have violations that you have
17 strong evidence for that are against certain
18 clauses.

19 I think one of the things we're doing
20 based on all the audits we've had to help inform
21 this is we are creating more of hierarchy in
22 threes of the citations themselves.

1 In terms of when you look across all
2 the citations in the regs, which ones, and that's
3 another element that hasn't really been captured.

4 It's sort of captured in 12 a little
5 bit. "Received a non-compliance that points to a
6 breakdown in a control system."

7 So that means actually really looking
8 at the regs and saying, "Okay, what would in the
9 regs there'd have to be a non-compliance against
10 for me to consider that?"

11 So at some point, all of this, then
12 also has to feed back into, "How would I actually
13 cite it?" So that again is a process that takes
14 time and thought.

15 So, for example, we've done citations
16 of certifiers in the past where, well, they
17 didn't have staff that knew the wild crops
18 regulations very well. Or we had mistakes in
19 certificates, or we had mistakes in a material
20 review.

21 So at one point are those three
22 separate violations? And at what point is

1 actually you don't have sufficient, capable staff
2 to carry out your mission?

3 And that's an entirely different part
4 of the reg and so getting real thoughtful in
5 terms of how we map all those pieces to each
6 other.

7 Is this a system capability issue? Is
8 it a personnel issue? What is the actual issue
9 and how does that pertain to risk? That's the
10 work we're doing right now.

11 MR. RICE: Thank you. Emily.

12 MS. OAKLEY: This is a question for
13 the program. We got really public comment on
14 this document, so I was wondering the extent to
15 which the program is engaged in that public
16 comment and able to incorporate some of that in
17 this current proposal?

18 DR. TUCKER: I think the public
19 comment that has been coming in, I certainly read
20 the public comment and I agree with the short
21 window. So I think we need to spend more time on
22 those. But they're certainly a resource side by

1 side with the work of the Board.

2 MR. RICE: All right, Harriet.

3 MS. BEHAR: So part of doing, you
4 know, risk-based is I think also having a robust
5 accreditation system for the certifiers, and I'm
6 very happy to hear that you're feeling very
7 confident about the current staff.

8 Because that can be a very big
9 deterrent to fraud if when they are being
10 accredited it's very obvious that the people who
11 are there know what to look for, know how to look
12 for it.

13 Understand the systems in great depth
14 and can go through some of these risk factors
15 without actually having them look like it's a
16 risk-based assessment. It's just the robust
17 system of review.

18 So, no, I think this is a good, it's
19 got its value and its approach, but I think
20 moving too far to just risk-based, I think, I
21 don't want us to forget that we need a robust
22 baseline as well.

1 Including enforcement because there's
2 nothing that discourages something than hearing
3 that somebody else got punished for doing
4 something wrong.

5 DR. TUCKER: Right, I think the risk-
6 based is one approach within a broad portfolio
7 which includes the basic regs and accreditation
8 system.

9 So for example, it's not that like
10 mid-term accreditation audits are going away if
11 you're a low risk or something. So there will
12 always be sort of a baseline that's in the regs
13 that we will always follow.

14 So, yes, the other thing, not only do
15 we have better staff. We also have a better
16 system now. We have with the remaining Farm Bill
17 funding we did buy an accreditation management
18 system which is also very helpful in actually
19 tracking and being able to really start looking
20 at trends over time with non-compliances.

21 MR. RICE: And Dave.

22 MR. MORTENSEN: Yes, I had a question

1 and a suggestion. I was, and I preface my
2 comments about such certification work by, you
3 know, this is not my field.

4 But I was really struck by the comment
5 this morning by the pineapple farmer that the
6 farmers themselves can serve as eyes on the
7 ground and collectively be sort of looking after
8 things in their neighborhood.

9 And so I just, this reading the
10 document it's very much the certifier looking
11 after, but I'm wondering if there are ways that
12 we can be moving in a direction where we're
13 encouraging farmers to work collaboratively to
14 not rat on your neighbor but at least be, you
15 know, eyes on the ground to keep things on the up
16 and up. And calling things into question when
17 they see it.

18 I didn't see anything of that flavor
19 in this, but that's a question then, is should it
20 be? Or is this not appropriate for this kind of
21 thinking the way we are looking at avoiding the
22 problem of undesirable outcomes in integrity?

1 MR. RICE: Ashley, I think you have a
2 response.

3 MS. SWAFFAR: Yes, so I don't think
4 that this document is the right place for that,
5 but I do think that is a critical piece that can
6 help with fraud detection.

7 You know, I fielded a formal complaint
8 this year that came from another grower. So, you
9 know, if they've contacted me because they didn't
10 know how to do it.

11 So, you know, that's a way for us to
12 expand on complaints and educating producers how
13 to file a complaint. You know, they don't know
14 how to do that.

15 So I think that's a good piece for
16 certifiers to tell their clients how to file a
17 complaint.

18 MR. MORTENSEN: Thank you, Ashley, and
19 then the suggestion is I think it's now about a
20 year and a half ago, maybe two years ago, that my
21 recollection, that some of the big fraud concerns
22 began to be discussed actively on the phones with

1 NOSB.

2 And I would find it helpful, and we
3 had a beautiful panel on this issue at the last
4 meeting, I believe, where we talked a lot about
5 this approach.

6 I would find it very helpful if an
7 NOSB member if we could have a, you know, fairly
8 comprehensive and robust report back to keep the
9 analysts and members up to date on how we're
10 doing on this issue.

11 Because, many of us I'm sure we're
12 being asked, you know, what are you guys doing?
13 You know, I was at the MOSES conference, there
14 were 50 farmers that Harriet and I sat in on a
15 session.

16 And I'm not feeling all that well-
17 informed about that as a board member.

18 MR. CHAPMAN: By us, do you mean the
19 NOSB or do you mean the National Organic Program?

20 MR. MORTENSEN: I mean us board
21 members, we board members be kept up to date I
22 guess by the NOP folks on how we're doing. You

1 know, are things getting better, are they about
2 the same? You know, are we backsliding? I don't
3 have a good sense for that.

4 MR. CHAPMAN: So Jenny had a large
5 portion of her presentation on Wednesday about
6 enforcement activities that the NOP is taking. I
7 want to make sure that we provide --

8 MR. MORTENSEN: I hope I was paying
9 attention to that. I didn't hear a lot about the
10 international issue in the grain trade from the
11 east, which I think is what got us going about
12 this; I remember specific phone calls.

13 John Bobbe, you know, I don't know. I
14 don't feel well-informed after that session.
15 It's no knock on Jenny's thing, I heard some
16 very helpful things. I didn't hear things about
17 that.

18 MR. RICE: About like Serbia and the
19 --

20 MR. CHAPMAN: Serbia and you know
21 corn, are we feeling better about the corn
22 market? Are we feeling better about soybeans?

1 You know, yes, those sorts of things.

2 Is it possible that you know, lower
3 prices from eastern Europe continue to be nagging
4 at the price of organic grains in the U.S.? I
5 didn't get a flavor for that. Those kind of
6 specifics.

7 MR. RICE: Jenny.

8 DR. TUCKER: You know, it may be, yes,
9 I realize the presentation on Wednesday, it
10 focused, you know, I had all these time
11 constraints, right, and I wanted cover the full
12 range of both what I felt we had done as a
13 program and what we were going to be focused on
14 in the next year.

15 If we can, I'll ask permission, if we
16 have, you know, five or ten minutes tomorrow
17 morning. We do have kind of a one-page fact
18 sheet that we use to illustrate where we believe
19 we are.

20 One of the challenges with fraud is
21 we're never going to be done. Right? And so we
22 do have that conversation internally as well.

1 "How are we going to know when we're done?" And
2 the answer is we're never going to be done.

3 I am actually more concerned about the
4 challenge shifting. Right? Everybody's really
5 focused on the Black Sea; I'm actually right now
6 more focused, I'm as focused on the Black Sea as
7 I am in other emerging risk areas.

8 So we're never done and it's never
9 going to, this is just be an ongoing thing. I
10 think I can provide more specifics that I believe
11 illustrate the actions we have done in more
12 specificity than perhaps I presented on Wednesday
13 if we can build in a few minutes for that
14 tomorrow morning, I'd be happy to bring it up on
15 Michelle's computer and just scroll through that
16 if that would be useful. Would that help?

17 MR. MORTENSEN: It would be useful to
18 me.

19 DR. TUCKER: Okay.

20 MR. MORTENSEN: And maybe other
21 members, so I would find that kind of detail
22 generally helpful. Jenny, I think that I totally

1 get it that it's a moving target.

2 I just would find it helpful to be
3 better informed about where we are. And what the
4 current and anticipated targets are that we're
5 concerned about. Those sorts of things would be
6 helpful for the Board to be appraised of.

7 Thanks.

8 MR. RICE: Great. Any, Steve.

9 MR. ELA: I just have a question, and
10 I'm not sure quite how to answer it because I
11 don't, or how to pose it. I mean do we see any,
12 I mean we have the state programs, and we have
13 the private certification programs.

14 And I know state programs are
15 hamstrung by full-time equivalents and budgets, I
16 mean, so are private ones but, you know, they
17 have to work within a governmental mandate.

18 Do we see any real differences between
19 programs? I mean are there any red flags we need
20 to be aware of between private certifiers and
21 state programs or is it just some states do
22 better than others?

1 Some private certifiers do better than
2 others, I mean are there any inherent problems or
3 flags in the system? Like you say I'm not trying
4 to point any fingers, I'm just curious if, you
5 know, different modes of action have different
6 results.

7 MR. CHAPMAN: I just want to point out
8 real quick there's actually three. There's
9 private; there's non-profit, for-profit and
10 state.

11 MR. ELA: Good point, sure.

12 MR. RICE: And state organic programs.

13 DR. TUCKER: So I'm sorry, so you're
14 looking for sort of a generalized sort of
15 description of --

16 MR. ELA: I guess I'm just wondering
17 if, I mean, in the time we've been accrediting
18 certifiers and you've been issuing non-
19 compliances or anything.

20 Is there any, do you see any
21 differences between the structure of the program
22 and ability to follow through or risk factors or

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DR. TUCKER: So I think a couple of them have been raised through here like the presence of satellite offices is automatically a risk.

And also from an audit perspective that is a bit of a challenge in that, you know, we publicize the fact we have about 80 certifiers.

When you start actually adding in the number of satellite offices, it actually jumps up to more like 120 offices. And so getting out to visit all of those satellite offices is a challenge.

So automatically that is going to be a risk just in terms of any distributed organization. They're going to be challenges and how do you get word from the mother ship out to all the other ships? I mean, that's just going to be part of it.

I don't think I could characterize, sort of further than that. I think it is

1 interesting to look at sort of the size dynamics
2 of different certifiers and how many operations
3 they have in terms of what that looks like in
4 terms of staffing profiles and risk management.

5 You know, how large do you need to be
6 in order to have like a real solid infrastructure
7 or quality management or things like that? I
8 think honestly we try and be really transparent
9 about this.

10 In that, if you go to our website, you
11 go to the Organic Integrity Database. If you
12 look up a certifier, you can access their most
13 recent audit.

14 So and we have a lot of folks in the
15 stakeholder community who keep a very close eye
16 on the most recent audit. So once audit reports
17 are finalized, certifiers have a chance to give
18 their corrective actions and we evaluate those
19 corrective actions.

20 Those audit reports do go online. So
21 I think if there are questions about any
22 particular certifier, reading those audit reports

1 will give you a general sense of what's going on
2 with any particular group.

3 MR. RICE: Great, thank you. Any
4 further discussion or questions on this area?
5 Yes.

6 DR. TUCKER: One very quick final
7 action. We've been really, you know, talking
8 about all the areas of improvement and risk with
9 certifiers.

10 I do want to say there are a lot of
11 certifiers doing an amazing job out there. And
12 so we tend to focus on well, where do we need to
13 improve? Where do we need to get better?

14 But there are some amazing people out
15 there doing amazing work to protect this market
16 and this industry. And I just want to make sure
17 that we do a shout out to the work that they are
18 doing.

19 Because it is an incredible group of
20 professionals working out there on the ground
21 every single day.

22 MR. RICE: Let's give a round of

1 applause for our certifiers. All right. Thanks
2 for that, really great discussion. And with
3 that, I think we can move to, let me get my place
4 here.

5 MR. CHAPMAN: We'll move to a vote.

6 MR. RICE: Move to a vote.

7 MR. CHAPMAN: All right. So this is a
8 motion that comes from the CACS subcommittee and
9 motion was made by Scott Rice and seconded by
10 Ashley Swaffar. And it's a motion to approve the
11 proposal on developing criteria for risk-based
12 accreditation oversight.

13 A yes vote is to adopt this proposal,
14 a no vote is to reject it, and the voting starts
15 with Scott.

16 MR. RICE: Yes.

17 MS. BEHAR: Yes.

18 DR. SEITZ: Yes.

19 MR. MORTENSEN: Yes.

20 MR. ELA: Yes.

21 MR. BRADMAN: Yes.

22 DR. GREENWOOD: Yes.

1 MS. DE LIMA: Yes.

2 MR. SCHWARTZ: Yes

3 MS. ROMERO-BRIONES: Yes.

4 MS. OAKLEY: Yes.

5 MS. BAIRD: Yes.

6 MR. BUIE: Yes.

7 MS. SWAFFAR: Yes.

8 MR. CHAPMAN: Chair votes yes.

9 MR. RICE: That's 15 yes, zero no,
10 zero absent.

11 MR. CHAPMAN: The motion passes.

12 MR. RICE: Thanks, Tom. Next up we
13 have training and oversight of inspector and
14 certification review personnel, and I turn it
15 over to Harriet who was the lead on this one.
16 Harriet.

17 MS. BEHAR: Okay, so we did get some
18 really great comments on this. And I say really
19 great because most of them were positive, so I
20 like that.

21 There were some reminders that as we
22 continue to develop inspector training modules

1 and various methods and standardization that
2 certifiers should always be kept in the loop.

3 I think that's understood, but we will
4 keep that in mind. The Organic Seed Association
5 said always keep seed issues in mind.

6 There was some really great
7 information provided by both IOIA and ACA giving
8 us some really good topics for trainings areas
9 where inspectors could use baseline skill
10 trainings and knowledge as well as more advanced.

11 So it could be kind of a priority
12 setting list from both of those organizations. I
13 like too that IOIA also brought up that it's not
14 only knowledge of the organic standards that's
15 important for a good inspector.

16 They have to be a good interviewer, an
17 excellent observer, and then be able to
18 communicate that information in a clear, concise
19 way to the certifier in order to do a good job in
20 passing on the information that the certifier
21 needs to make their determinations.

22 Most of the commenters agreed that it

1 was a good idea to include certification review
2 personnel in this area. Although some certifiers
3 felt that they needed to be more directive to
4 their own employees and that they feel that
5 they're already doing a good job.

6 However, they did agree that this was
7 an area that should not be forgotten that
8 reviewers also need to understand the regs and be
9 able to read what's being communicated to them
10 and picture what's being transmitted.

11 Because they have a basic
12 understanding of handling or livestock or crops
13 or wild harvest when those items are being
14 discussed so they can then make their final
15 review.

16 IOIA also recommended looking at other
17 post-secondary educational institutions as places
18 to provide knowledge and skills to organic
19 inspectors.

20 And they felt that a more in-depth
21 survey could be done where current inspectors
22 could express where they feel they might be

1 lacking in skills and knowledge in order to do a
2 good job.

3 There was discussion that the
4 National Organic Program should step up and help
5 fund some of the more advanced trainings that
6 right now it's kind of part of the, you know, the
7 inspector's pay and the non-profit or these, you
8 know, small staff organizations are putting on
9 these trainings and they don't have the real
10 funding behind them to do some of these more
11 technical trainings.

12 Especially to bring in outside
13 personnel that might be fairly expensive. So
14 that was an interesting. Others also talked too
15 about when we discussed having a list of what
16 skills inspectors had so all certifiers would
17 then have access to that.

18 Some were concerned about the privacy
19 for the inspectors that there would have to be
20 some kind of release or something. So that was
21 something I had not considered, but that's an
22 interesting thought.

1 Again, ACA had some great survey
2 questions. They had quite an extensive public
3 comments on this and even examples of like an
4 evaluation form of inspectors and that sort of
5 thing so that we could really see that the
6 certifiers, you know, have the starts of a really
7 robust system.

8 We know that there's some areas where
9 there can be improvement, but it's definitely an
10 area where they are not ignoring this. They are
11 paying attention because when there's a poorly
12 written report or they get a complaint from a
13 client that the inspector didn't know what they
14 were doing.

15 Of course, both of those kind of make
16 their job a lot harder and reflect poorly on the
17 certifier. So the same thing with inspectors as
18 far as doing some kind of survey to see where
19 there's areas of lacking.

20 There was discussion about doing the
21 same with review staff. Where do they feel they
22 need some more help? And that sort of thing to

1 help make sure that we're not just filling in
2 gaps that are not there and then ignoring areas
3 that we never knew were a problem.

4 So but mostly very much the public
5 agreed with where we went and liked what we did.
6 And the public comments mostly gave us a little
7 bit more on the priority areas that we can set by
8 using these tools that we have laid out here.
9 And that's it.

10 MR. RICE: Thanks, Harriet.
11 Discussion from the Board and question? Ashley
12 or someone else while Ashley prepares her
13 thoughts? Tom.

14 MR. CHAPMAN: I mean I don't have any
15 deep thoughts on this other than I think it was
16 an excellent proposal that we received a lot of
17 support on. And I look forward to passing it.

18 MR. RICE: Ashley.

19 MS. SWAFFAR: Yes, so I've been
20 fortunate to live on both sides of this issue as
21 a client, as an inspector, and now back as a
22 client.

1 So I feel like I've seen a whole gamut
2 of fun stuff between inspectors and reviewers.
3 And, you know, I just want to say for inspectors
4 I don't feel that IOA's the only way, you know,
5 for training for inspectors.

6 All right, mic difficulties here. But
7 I do want to point out that I really think it's
8 critical when we're looking at inspectors in
9 scopes.

10 You know, I was a livestock and crop
11 inspector, but it was not all species of
12 livestock. And I think that is what I heard from
13 clients so much is you know, "Man, I have this
14 inspector. They didn't know a thing about
15 chickens."

16 And that's so frustrating for a
17 client. So I think that's a place that really
18 needs to be looked at by certifiers when they're
19 assigning inspectors to operations. It's really
20 looking at what do they know anything on a
21 commercial level on those operations?

22 Not just like for poultry, you know

1 backyard, but you don't know what you're looking
2 at going into a larger farm. It can be very
3 challenging because I see looking at an
4 inspection, some of those inspectors, they don't
5 do a great on mass balances.

6 And those are the critical areas that
7 we're looking at for fraud prevention and things
8 like that. So you know, really specializing in
9 what they're doing.

10 And then the same thing with review
11 staff because I see a lot of variation with
12 review staff when they're reviewing files, and so
13 I think, you know, specialized training for them
14 is critical on this too.

15 MR. RICE: Sue.

16 MS. BAIRD: Yes, I echo what Ashley
17 says, I think that I think the inspector needs to
18 be upfront with what they can do scope-wise.
19 Sometimes they say, "Well, I've got a lot of
20 stock," and I think that's livestock.

21 And livestock might be a dairy but
22 certainly not a poultry or vice versa. And I

1 think the certifier needs to be diligent to
2 pursue what the scope of the inspector's
3 knowledge base is.

4 And I also heard and I applaud someone
5 who said that sometimes it's beneficial that we
6 have team inspectors. And I see that especially
7 when you go into the really complex handling
8 operations.

9 To date, there are some, but a lot of
10 certifiers still want to give you maybe four
11 hours to do a complex operation. And it just
12 don't work.

13 Not if people do a real true mass
14 balance. Not if you're going to be comprehensive
15 enough to detect a fraud.

16 Now you can go in and maybe do an
17 overview. So I think it needs to be education of
18 our industry as well. That they understand to
19 protect their reputation and to protect the whole
20 Organic Integrity's reputation.

21 They must be prepared to pay for a
22 more comprehensive and to be; just I'll put it

1 there, be prepared to pay for a more
2 comprehensive inspection.

3 When I was a QA manager at Cargill,
4 we had a HACCP audit, and we expected those
5 auditors to be there for a week. I mean that's
6 just the way it is.

7 If you're going to do a comprehensive
8 that's just what we allocated to do it on HACCP
9 inspection you expect them to a good four hours.

10 So I think it's not only, not only the
11 inspectors but we need to educate our clients
12 themselves on what to expect and the value for
13 them.

14 MR. RICE: Thanks. Ashley.

15 MS. SWAFFAR: Yes, I will say I see
16 that a lot because I honestly in new poultry get
17 a whole lot of chicken inspections and they've
18 got to, they got a taste of it for those first
19 mass balances that I did.

20 They were used to it by the end, but
21 they just didn't understand why it was so
22 thorough. And when you explain to them, you want

1 me to do this to you, and then you want me to do
2 it to your neighbor, they kind of got it.

3 Like, oh, it makes sense now. You
4 know, so I think there's some education there for
5 sure.

6 MR. RICE: All right.

7 MS. BEHAR: So having been an organic
8 inspector trainer for many years and having
9 mentored many inspectors and having done team
10 inspections and having done multiple-day
11 inspections, I agree with you.

12 So I think that one area of team
13 inspections and peer mentoring is kind of an area
14 that is very, very useful that has not really
15 been instituted, and there's times as an
16 inspector trainer that I would see someone in a
17 class.

18 And within 25 minutes of discussion on
19 some subject, I could tell who got it and who
20 didn't. And I really have been trying to figure
21 out what is that magic? What is that?

22 You know, and it was hard for me to

1 say what does it mean that they got it? But they
2 understood the traceability; they understood the
3 holistic system, they understood how in an
4 interview you might hear something off to the
5 side.

6 Like "Oh, I'm using my brother-in-
7 law's bin," or something like that. And it's in
8 a discussion about a family wedding or something
9 like that they're talking about and that you have
10 to follow that thread, because, oh, that bin was
11 not on your organic system plan and we have to go
12 visit it.

13 So and it's the same thing at a
14 handler. There might be some discussion about oh
15 I had to change a supplier when you're looking at
16 the warehouse. But certain people will
17 understand that that was an important kernel of
18 information and others it will go right over
19 their heads.

20 And I don't know how you identify that
21 and I don't exactly how you instill that in
22 people. But I think mentoring is a very good way

1 because most people learn by experiencing.

2 And so if it's like on the job
3 training with somebody there to kind of be the
4 safety net to make sure that the job is being
5 done correctly, I think that really works well.

6 But there is really very little
7 funding for this because that's a big burden on
8 the mentored inspector if they're just going to
9 go along on these inspections and not get paid.

10 And it's extra work for the actual
11 inspector who's probably the one who takes the
12 responsibility for the inspection to then spend
13 the time with a mentee and go over things and
14 say, oh, this was missed or whatever.

15 So I'm not really sure with the
16 program or whatever but I would like to continue
17 working, especially on the mentoring and the team
18 inspections which I think can be very, very
19 useful.

20 MR. RICE: Sue.

21 MS. BAIRD: I wanted to commend the
22 subcommittee on identifying approving skills how

1 to diffuse negative situations. I think that's
2 pretty critical.

3 Especially we seem to be becoming more
4 of a society that perhaps would take offense at
5 things. And my way of doing it is to become a
6 little bit more Southern lady the further along
7 we get.

8 We get into a tense situation and I
9 just kind of giggle, "I just don't understand how
10 this is just not balancing." And just get a
11 little bit more dumb the whole time as I go
12 along.

13 Now that's my method, and it works for
14 a little old Southern lady, I'm not sure how
15 other people do it. But I think that's critical
16 as well.

17 We don't want to portray to our
18 clients that they're committing fraud. We just
19 need to help them to understand that there's
20 another piece of information we need here.

21 And I think that's critical. We're
22 seeing some strange climate out there. People

1 really want to get angry; it appears to me. So I
2 like that addition on that.

3 MR. RICE: Okay, I wanted to respond
4 real quick. In terms of, I agree there's that
5 aptitude that some people just innately have, but
6 then it's important to look at some of the
7 resources that we have outside of our, kind of
8 certification frame of mind.

9 And one of the things that we take
10 advantage of or have the ability to advantage of
11 some courses and trainings through the state that
12 maybe are more targeted to investigative
13 situations that we've found are really helpful
14 for our staff both review and inspection.

15 And one of the things that's been
16 really helpful if sending folks to training on
17 investigations that includes the IRAC method
18 where you identify the issue, the section of the
19 rule that applies to that issue.

20 The application of that and coming to
21 a conclusion and keeping it very fact focused.
22 And I think when you're able to kind of walk that

1 line it also helps address some of those
2 diffusing kind of situations where it's, you
3 know, we're not attacking a person we're looking
4 at an issue, and we can tie it directly to the
5 rule.

6 And if you find yourself out in left
7 field and you can't tie it to the rule, then you
8 need to walk back a little bit. But it's sort of
9 touching on a few things in there.

10 And also I wanted to highlight that
11 there were a number of commenters that also from
12 certifiers saying that they appreciated a
13 baseline but still wanted to maintain some or
14 hold on to some flexibility in how they get to
15 that baseline.

16 And I think that's really important
17 when we don't want to necessarily take tools that
18 are working away from anybody but still allow
19 that innovation.

20 Ashley and then I think we need to
21 wind it up.

22 MS. SWAFFAR: Great. So I just want

1 to say I do think there's a lot of really great
2 inspectors out there that do a really good job.

3 But we're getting ready to lose a
4 whole lot of inspectors. If you look at the age
5 of inspectors out there, I mean, they're ready to
6 hang it up and go home.

7 So like they're tired of being on the
8 road. I did it for three season, and I couldn't
9 cut it. I want to be in Arkansas. So I think
10 that this document is critical moving forward
11 for, you know, for such a growing industry that
12 we have.

13 We need inspectors, and we need better
14 guidelines on, you know, what we expect out of
15 those inspectors. So hopefully this can get in
16 place before a lot of those folks retire and the
17 new that comes on.

18 MR. CHAPMAN: Do we need a round of
19 applause for the inspectors?

20 MR. RICE: I think that would only be
21 fair. All right, I think we are ready to move to
22 a vote.

1 MR. CHAPMAN: It's not projecting, but
2 I can get it off my screen. All right, so the
3 motion, we have a motion that comes from the
4 subcommittee. The motion was made by Harriet and
5 seconded by Rick.

6 The motion is to adopt the proposal as
7 guidance of the NOP inspector certification
8 review personnel training and oversight.

9 A yes vote to adopt this proposal and
10 a no vote is to reject it, and the voting starts
11 with Harriet.

12 MS. BEHAR: Yes.

13 DR. SEITZ: Yes.

14 MR. MORTENSEN: Yes.

15 MR. ELA: Yes.

16 MR. BRADMAN: Yes.

17 DR. GREENWOOD: Yes.

18 MS. DE LIMA: Yes.

19 MR. SCHWARTZ: Yes.

20 MS. ROMERO-BRIONES: Yes.

21 MS. OAKLEY: Yes.

22 MS. BAIRD: Yes.

1 MR. BUIE: Yes.

2 MS. SWAFFAR: Yes.

3 MR. RICE: Yes.

4 MR. CHAPMAN: Chair votes yes.

5 MR. RICE: That's 15 yes, zero no,
6 zero absent.

7 MR. CHAPMAN: The motion passes.

8 MR. RICE: I'm going to turn it over
9 to Jenny Tucker now for a look at the Integrity
10 Learning Center.

11 DR. TUCKER: Is this automatically on?
12 It's off, okay. So my main goal here is to just
13 show you this is real.

14 And to give you a sneak people and to
15 invite you to come to the November 15th the
16 webinar to lead more. And so the goal of the
17 Organic Integrity Learning Center is to provide
18 online training.

19 So that's the piece of the action that
20 we're filling is the online training to support
21 the professional development and continuing
22 education of organic professionals working to

1 protect organic integrity.

2 Now, we are really focusing on
3 inspector and reviewers and certifiers. We'll
4 also have a section for organic farmers and
5 handlers.

6 That's where we will put all of our
7 collection, for example of Sound and Sensible
8 modules because they're a very good training in
9 there for our farmers and handlers that came out
10 of the Sound and Sensible Initiative.

11 So we are still working on what all
12 the different topics will be, this is where
13 having feedback from you will be helpful during
14 the webinar and where the NOSB worked so far.

15 It will be very informative in
16 building this out. So this is hosted on a
17 platform called blackboard.com. Blackboard is
18 used by colleges and universities across the
19 country.

20 And so this is the landing page on the
21 Blackboard server so we already have the
22 infrastructure stood up and so this is just a

1 placeholder home page.

2 Eventually, once this is launched
3 which we're really targeting for January. Where
4 people will be able to come and register for the
5 system.

6 They'll be able to go to a dashboard,
7 and they'll literally be able to see the courses
8 that they can register for. So the different
9 topics that they can register for depending on
10 who they are whether they're an inspector,
11 reviewer, or certifier.

12 They'll be able to see their completed
13 courses, they'll be able to print a transcript
14 that shows what they have successfully completed.

15 So then an independent inspector, for
16 example, couple print out their transcript and
17 take it to a certifier and say, "Hey, here's the
18 continuing ed that I have done in this system."

19 Now we are developing material that we
20 don't believe exists out there in the public
21 domain that we think everyone needs. We are also
22 interested in a crowdsourcing content that other

1 folks have already developed and that are either
2 willing to just give us to up and make available
3 to others.

4 Or we are willing to commission
5 training development depending on the topic. And
6 so we're looking for a content in a lot of
7 different ways. And we do see this being an
8 ongoing effort.

9 Based on the competencies and skill
10 that continue to emerge as the top priorities.
11 So again just wanted to provide that this is
12 actually a system that lives on a server that
13 people will be able to log into and take training
14 through, again, ideally starting sometime in
15 January.

16 MR. RICE: Excellent, that's for the
17 sneak peek, Jenny. And I'll look forward to
18 learning some more about that.

19 DR. TUCKER: Yes, thanks for the work
20 from the Board on this and all the stakeholders
21 who have contributed to this effort so far.

22 MR. RICE: Great, thank you. Now I'll

1 turn it over to Tom for a synopsis for a synopsis
2 of a lot of what we've been talking about.

3 MR. CHAPMAN: All right, so this is
4 the verbal update, analysis, and feedback from
5 the spring 2018 import panel.

6 And there's no document in here yet.
7 The concept here was to provide a summary of
8 comments and concepts received from both the
9 publish and the panels. And both panels at the
10 spring 2018 meeting bucketed into major themes or
11 actions.

12 This document is sufficient as kind of
13 being a strategic roadmap for potential future
14 action with possible next steps carry's the
15 responsibility in potentially some ranking of
16 importance or impact for prioritization work.

17 Some of these items that were
18 discussed in that meeting are already under
19 action either by the NOP or by the NOSB by the
20 fact of the two matters we just passed.

21 So and then just by evidence of the
22 NOP 2019 strategic plan that was shared

1 yesterday. So we really just wanted to put this
2 on the agenda so members of the public who have
3 provided their comment knew that we were
4 continuing to work on that, collate that
5 information, and continue to work forward to
6 present then something that was usable by future
7 NOSBs and the program the program to find ways to
8 increase organic integrity and supply chains.

9 Just, if we were to try to get it out
10 at this meeting given other priorities and other
11 workload. It would have been a deterrent to the
12 the robust comment and feedback we received.

13 So more on that to come. And we hope
14 to have something that will come forward in the
15 spring 2019 meeting.

16 MR. RICE: Great, thanks Tom. With
17 that, we complete the work of the CACS, and I
18 turn it back to you Tom.

19 MR. CHAPMAN: Thank you, Scott.
20 Actually, I think we can get through the
21 livestock section in three minutes.

22 MR. RICE: No, I think we will, I will

1 give you three minutes of your life back today.
2 Perhaps there was one too many beard jokes that
3 took up too much time.

4 So we will move into recess in a
5 moment. We'll start back up tomorrow morning at
6 8:30 with the Livestock Subcommittee. Following
7 that will be the Handling Subcommittee. And then
8 following that and if we're running behind we
9 won't stop for lunch.

10 Following that will then be the Crop
11 Subcommittee, after that we would deal with any
12 deferred proposals. Review the NOSB work agenda
13 and then go forward with officer elections.

14 Hopefully wrapping up by 5:30 or 5:00
15 so folks can set their prices folks can go by
16 4:30 or 5:00 so folks can get their flights.

17 One last thing is to yet again remind
18 folks that there's a networking reception, I
19 believe, next door feature delicious cocktails
20 and hors-d'oeuvres. Hopefully, they have organic
21 pineapple as well.

22 And that starts at 6:30 and runs to

1 9:00. Thank you, everyone, for public comment.
2 The Board for its attention, participation today,
3 and the NOP as well. We'll stand in recess,
4 until tomorrow at 8:30.

5 (Whereupon, the above-entitled matter
6 went off the record at 5:28 p.m.)

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C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: National Organic Standards Board
Fall 2018 Meeting

Before: USDA

Date: 10-25-18

Place: St. Paul, MN

was duly recorded and accurately transcribed under
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UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ORGANIC STANDARDS BOARD

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FALL 2018 MEETING

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FRIDAY,
OCTOBER 26, 2018

The Board met in Great River Ballrooms 1&4 of the Intercontinental Saint Paul Riverfront Hotel, 11 Kellogg Boulevard East, St. Paul, Minnesota at 8:30 a.m., Tom Chapman, Chairman, presiding.

PRESENT

TOM CHAPMAN, Chair
HARRIET BEHAR, Vice Chair
SCOTT RICE, Secretary
SUE BAIRD
ASA BRADMAN
JESSE BUIE
LISA DE LIMA
STEVE ELA
RICK GREENWOOD
DAVE MORTENSEN
EMILY OAKLEY
A-DAE ROMERO-BRIONES

ERIC SCHWARTZ

DAN SEITZ

ASHLEY SWAFFAR

STAFF PRESENT:

MICHELLE ARSENAULT, NOSB Advisory Board

Specialist, National Organic Program

SONIA JIMENEZ, Deputy Administrator, Specialty

Crops Program, Agricultural Marketing

Service

CLARISSA MATHEWS, Ph.D., National List Manager

DEVON PATTILLO, Materials Specialist, National

Organic Program

DR. JENNIFER TUCKER, Ph.D., Deputy

Administrator, National Organic Program;

Designated Federal Official

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

8:35 a.m.

1
2
3 CHAIRMAN CHAPMAN: All right. It's
4 8:35 and we'll come back into order for our last
5 day of our NOSB meeting. Today we have the
6 Livestock Subcommittee, the Handling
7 Subcommittee, the Crops Subcommittee, a review of
8 the work agenda and then officer elections. So
9 quite a bit today.

10 But before we get into any of that,
11 we're going to follow up on the request from Dave
12 for some more information about enforcement
13 activities, and I'm going to hand it over briefly
14 to Jenny to talk a bit more about that.

15 DR. TUCKER: Okay. Well, we're
16 starting by just reminding folks of the four NOP
17 priorities, so that's the first slide. The goal
18 here is to provide a bit more specificity around
19 the actions that we've taken on imports and the
20 successes that we have had in that area. So I
21 think we sort of alluded to some of those
22 yesterday, but we wanted to put them all in one

1 place.

2 So why don't I just -- I can just get
3 up and come over there. There's not that many
4 slides.

5 Okay. There we go. Thank you.

6 So let's review specific actions on
7 imports. And again, I think I alluded to a lot
8 of these in Wednesday's presentation, but having
9 them all in one place with a bit more specificity
10 will help, I think.

11 So USDA does continue to actively
12 investigate foreign organic supply chains, and
13 the Black Sea region certainly is an area of
14 focus. So we have issued proposed and final
15 revocations. We've successfully revoked three
16 operations in Russia and Turkey and are pursuing
17 a complaint for hearing against a fourth.

18 Multiple other investigations are in
19 progress with the cooperation of both private and
20 federal partners using technology and risk
21 assessment indices. And so OIG and APHIS are
22 important partners with us. I've been talking

1 about the relationship building that's been
2 happening there.

3 We've been having close communication
4 with U.S. importers. Increased information
5 sharing there. We are investigating fumigation
6 notices when products are destined for the
7 organic market are treated at the border.

8 So sort of outcomes of that. As we've
9 been monitoring what's happening with
10 certification in that region of the almost 1,200
11 operations in that area that were formerly
12 certified, only about 700 remain certified, so
13 there's been a significant drop.

14 Many have surrendered or have been
15 suspended or revoked by their certifier, so the
16 actions that I just spoke about in terms of
17 revocations and hearings or actions and OP has
18 taken. But certifiers are also taking action
19 there.

20 So the trade data. So the question is
21 so what? What is the outcome? There has been a
22 95 percent drop in the volume of organic corn

1 from Turkey, and so that is taking the difference
2 between the highest imported volume that was
3 recorded in January 2016 and the most recent data
4 point which was August 2018. So 95 percent drop.
5 So hopefully that communicates some progress.

6 Next slide. Okay. Let's talk about
7 specific action with certifiers. So face-to-face
8 training in the U.S. and Europe. We have done
9 webinars on adverse actions on verifying reported
10 yields. This has been a challenge in terms of
11 capability development.

12 We have been doing unannounced
13 inspections and testing. It's been required for
14 all grain and oil seed suppliers in Turkey and
15 the Black Sea and for all incoming vessels in
16 that region. So testing has not only resulted in
17 product being diverted from the organic supply
18 chain, but it's also directly resulted in some of
19 those surrenders that I mentioned.

20 We have issued non-compliances to
21 certifiers and we have proposed a suspension of a
22 certifier's satellite office. That's on appeal

1 right now.

2 We have also focused our oversight on
3 all those surrendered operations just to make
4 sure they don't just reapply through some other
5 certifier. And so we have asked certifiers to be
6 keeping us up to date. There has been some
7 certifier shopping of surrendered operations in
8 that area, but to date they have not been
9 certified.

10 Okay. Let's go ahead. So what we're
11 doing, sort of government level. I talked about
12 -- illustrated our rapid response approach for
13 questionable imports. I walked through the
14 Serbian case study on Wednesday. And so that
15 rapid response approach allows us to pretty
16 quickly figure out what's happening when we start
17 seeing questionable imports.

18 We have developed a standardized
19 process for ship-specific checks and have been --
20 and investigated multiple shipments in that way.

21 We've published two policy memos, I
22 mentioned this on Wednesday, on the impacts of

1 APHIS requirements for organic imports. It's
2 really raised awareness across the industry.

3 And we're also partnering more with
4 our perishable commodity licenses. That's run
5 through a different program within AMS. And so
6 we issued a joint letter and that's gotten a lot
7 of coverage in the produce community.

8 We are doing a much better job of
9 sharing information on questionable imports. We
10 have built relationships across APHIS. I did go
11 to my Miami with APHIS in August. And we're
12 communicating more with on-the-ground folks with
13 the Foreign Ag Service. Those are bridges that
14 are new for us in extending our capability
15 overseas.

16 We are ready, I mentioned on
17 Wednesday, to contract with CBP to initiate
18 organic message SAT programming. So now that
19 we're in a new fiscal year, that will make that
20 project able to move forward more quickly.

21 Next slide. Okay. So what are some
22 examples of blocked shipments? We had some corn

1 that were coming from -- corn was coming from
2 Turkey. Crops were grown in Russia, Moldova and
3 Kazakhstan. These were refused entry by APHIS.
4 Corn and soybeans have been blocked coming from
5 Turkey, with corn from Kazakhstan.

6 APHIS has been a very valuable partner
7 in this work. We have blocked shipments of
8 chickpeas, and there was a blueberry shipment
9 from Chile which was not only stopped, but
10 recalled and destroyed.

11 Let's keep going. All of this needs
12 to be within a broader understanding of the risk.
13 U.S. organic sector is now fully integrated with
14 the global marketplace and imports have continued
15 to increase in size and scope. So we are
16 introducing new approaches to manage that, but
17 when you look at the growth between 2011 and
18 2017, we have gone from \$667 million over 20 HS
19 trade codes in 72 countries. It's increased to
20 1.9 billion across 57 trade codes in 89
21 countries. That's just in six years. So this is
22 a tremendous growth out there in the market.

1 And then here are some of -- so
2 pictures of the type of analysis we're now better
3 able to do quickly. I've mentioned that we were
4 able to recruit an economist with very tight ties
5 in with the Foreign Ag Service, and he has done a
6 really nice job of helping us access and analyze
7 data sources that we haven't really looked --
8 been able to look at as thoroughly before.

9 So here's a chart for example of
10 import volume of organic corn where we're looking
11 at Turkey, Argentina and Serbia. So Serbia again
12 a case study I raised. Turkey we all know about.
13 This is in metric tons, but it helps you see some
14 of the trend lines over time. So you can see
15 some growth in that Turkey market that has now
16 dropped off. But this is also allowing us to see
17 what is coming up and what has happened most
18 recently so that we can adjust our risk-based
19 oversight appropriately based on changes in these
20 curves over time.

21 So that's the end of that
22 presentation. Again the goal was to give --

1 respond to the Board's request for some
2 additional context on both the actions we're
3 taking and some of the successes over the last
4 year. So thanks for listening.

5 CHAIRMAN CHAPMAN: Any questions for
6 Jenny?

7 Dave?

8 MEMBER MORTENSEN: Jenny, thank you.
9 And that is the very kind of thing I was asking
10 about, so thank you for going to the trouble of
11 pulling that together.

12 DR. TUCKER: Thank you for raising the
13 question.

14 MEMBER MORTENSEN: It's clarifying.
15 Thank you. And it is encouraging to see the
16 progress in outcomes by the steps that we're
17 taking to make change.

18 DR. TUCKER: It's a work in progress
19 and will never be done, but we will keep on
20 going.

21 MEMBER MORTENSEN: So if I could, just
22 a couple of questions. Of the approximately 500

1 operations, I think you used the word an
2 operation would be a farm or would that be a
3 certifying agency and a farm and a -- what would
4 an operation be?

5 DR. TUCKER: Yes, thanks for -- that's
6 a good question. Operation includes farms and
7 businesses, so we just call them certified
8 operations. So listings in the Organic Integrity
9 Database.

10 MEMBER MORTENSEN: Okay. So could you
11 give us some insight into what it was about those
12 500 out of almost 1,200 that resulted in them
13 having their organic certification revoked in a
14 very short period of time?

15 DR. TUCKER: So different suspensions
16 and revocations would have happened for different
17 reasons, and a lot of those were done at the
18 certifier level. And so I don't -- we don't have
19 case -- when a certifier suspends or somebody
20 surrenders, it gets logged in the Organic
21 Integrity Database. We don't have all the
22 context for the investigation that occurred that

1 led to that outcome.

2 MEMBER MORTENSEN: We wouldn't have
3 access to that information?

4 DR. TUCKER: So we -- I mean, honestly
5 we could ask the certifiers for all of the
6 investigative records that led to the suspension.
7 I'm more interested in getting them out of the
8 game and going to the -- making sure we're
9 getting a broad coverage.

10 Certifiers are our point of contact on
11 the ground and that's what they're there for.
12 And so we're doing capability development with
13 them to make sure they're on the -- doing the
14 right things on the ground and have issued
15 notices of non-compliances. So I suspect that
16 some of the non-compliances to certifiers caused
17 them to change their actions which led to some of
18 these adverse actions against operations.

19 MEMBER MORTENSEN: Yes, because that
20 -- to me this is an example of the discussion
21 that we had on the risk-based modeling yesterday,
22 hot spots of non-compliance, cool spots of good

1 behavior. It would be interesting if the data
2 could be mined in a way that we had some sense
3 for the collective qualities about an operation
4 that leads it to be one of 500 and the collective
5 qualities of an operation that leads it to be one
6 of the other 700 so that it helps us target not
7 only the operations in Turkey, but in Serbia or
8 other places. Is that possible with the data
9 that we have or not?

10 DR. TUCKER: I'm not sure we
11 immediately have that kind of data. This is a
12 bit of a balance between -- there are a lot of
13 hot spots out there.

14 MEMBER MORTENSEN: Yes.

15 DR. TUCKER: And so it's a bit of a
16 balance between looking to what's next and
17 analyzing where we actually think we've really
18 had some impact. Yes, we can do more analysis on
19 that to analyze it. I think honestly there are
20 enough problems out there that I would rather
21 take a more broad let's-go-to-the-next-hot-spot,
22 and we know they're out there.

1 MEMBER MORTENSEN: Okay.

2 DR. TUCKER: Yes.

3 MEMBER MORTENSEN: And just one last
4 question: There is a spike for example in the
5 Serbian grain trade in the graph. None or so low
6 that it was -- you can't see it on the Y axis to
7 2018 up to whatever 20,000 units. Does that set
8 of a risk-based trigger?

9 DR. TUCKER: Yes, and that's why we
10 immediately when we saw the -- we heard about the
11 crops coming in from -- so that was a -- it was a
12 good flag. And we have immediately deployed
13 Foreign Ag Services on the ground there. We also
14 -- it is true that that government has been
15 investing in organic production and I think -- so
16 we have to remember that just because there's a
17 spike doesn't mean they're all bad actors. That
18 there are countries that are investing in organic
19 --

20 MEMBER MORTENSEN: Yes.

21 DR. TUCKER: -- as a growth area.

22 MEMBER MORTENSEN: Yes.

1 DR. TUCKER: But I think we have a
2 good indicator of what the government has been
3 doing to foster that growth responsibly and we
4 have our Foreign Ag Service on the ground.
5 That's capabilities we didn't have a year-and-a-
6 half ago.

7 MEMBER MORTENSEN: Yes.

8 DR. TUCKER: And so I think that
9 that's where we can -- again you see another sort
10 of spike there that might tell me, well, gosh,
11 maybe I need to go spend some time somewhere
12 else, too.

13 MEMBER MORTENSEN: Yes.

14 DR. TUCKER: Yes, and that -- I think
15 that's an early warning system that is new and
16 that is useful.

17 MEMBER MORTENSEN: Thank you, Jenny,
18 for pulling this together. It's very helpful.
19 Appreciate it.

20 DR. TUCKER: Thank you. We are going
21 to be; final comment, funding a project this
22 year. I mentioned it at the spring; we weren't

1 able to get in place before the end of the fiscal
2 year, but we are going to -- we are funding a
3 project to do some pretty focal pilot commodity
4 country studies. So how would you do a mass
5 balance at a country level for a specific
6 commodity?

7 And so one of the case studies we'll
8 do will be in the Black Sea region and then one
9 of the case studies will be in South America.
10 And I think that will also give us yet another
11 repeatable process that we can quickly field when
12 we see these risk areas. We can immediately
13 deploy a team. Okay. Let's go to that country
14 and do this kind of ground-level work. We don't
15 have a specific repeatable process for doing that
16 yet, but in six months we will.

17 CHAIRMAN CHAPMAN: Since this isn't on
18 the agenda, I'm going to ask folks to keep their
19 questions brief so we can get back to agenda
20 items.

21 Emily?

22 MEMBER OAKLEY: This is just a thank

1 you for that data. I think it was really helpful
2 and I also think more of that at the beginning of
3 each NOSB would be appreciated by the broader
4 stakeholder community that might not be here
5 today. But thank you so much. This was great.

6 CHAIRMAN CHAPMAN: Harriet?

7 VICE CHAIR BEHAR: Thank you. I
8 reiterate thanking you, but our market -- and
9 especially I think getting this out so this could
10 deter bad actors because they know we're looking.
11 But that being said, our market is still
12 extremely attractive. And so I think we need to
13 be continually improving. And I'm very happy
14 about the block chain development because I think
15 we need to stay ahead of them instead of them
16 ahead of us.

17 CHAIRMAN CHAPMAN: Okay. Thank you
18 very much, Jenny, for that and pulling it
19 together on such short notice.

20 With that we will move back to our
21 regular scheduled programming and I will hand it
22 over to Ashley for the Livestock Subcommittee.

1 MEMBER SWAFFAR: So good morning,
2 everyone. Welcome to the Livestock Committee.
3 Many of you ended your evening with alcohol, so
4 we're going to start our morning with alcohols.

5 So we'll start this morning with the
6 program reading the first item.

7 DR. MATHEWS: Thank you. So we'll
8 start the sunset reviews. We had Section 205.
9 603 of the National List, Synthetic Substances
10 Allowed for Use in Organic Livestock Production.
11 Paragraph (a) is disinfectant sanitizer and
12 medical treatment as applicable, alcohols. And
13 the listing is ethanol disinfectant and sanitizer
14 only prohibited as a feed additive.

15 MEMBER SWAFFAR: Thank you.

16 Jesse?

17 MEMBER BUIE: The NOP has allowed
18 ethanol use in organic livestock production for
19 over 20 years. While there have been several --
20 while there are several alternatives to the
21 material, ethanol is relatively harmless and
22 provides an additional mean of disinfectant

1 thereby reducing the chances of developing
2 bacterial resistance.

3 Public comments were overwhelming in
4 favor of relisting ethanol. It is unlikely that
5 large-scale spills and associated environmental
6 contaminations will occur under the allowed use
7 of ethanol as a sanitizer and disinfectant in
8 organized livestock production.

9 Are there any questions?

10 MEMBER SWAFFAR: Thanks, Jesse.

11 Open it up. Anybody?

12 (No audible response.)

13 MEMBER SWAFFAR: I see no further
14 debate.

15 Tom?

16 CHAIRMAN CHAPMAN: Okay. So this is
17 a motion coming from the Crop Subcommittee.
18 Motion is made by Jesse, seconded by Harriet.
19 The motion is to remove ethanol-based products
20 from the National List.

21 To remind folks this is sunset voting
22 and in sunset voting in order to ensure each make

1 material gets a vote we vote to remove. We make
2 motions to remove. So if you do not want to
3 remove the substance, if you do not want to
4 sunset the substance, then you vote no. If you
5 do want to sunset the substance, if you do want
6 to remove it, then you vote yes.

7 So this motion came from the
8 subcommittee with six no votes. The voting will
9 start with Dan. A no vote is to remove; a yes
10 vote is to retain.

11 Dan?

12 MEMBER SEITZ: No.

13 MEMBER MORTENSEN: No.

14 MEMBER ELA: No.

15 MEMBER BRADMAN: No.

16 MEMBER GREENWOOD: No.

17 MEMBER DE LIMA: No.

18 MEMBER SCHWARTZ: No.

19 MEMBER ROMERO-BRIONES: No.

20 MEMBER OAKLEY: No.

21 MEMBER BAIRD: No.

22 MEMBER BUIE: No.

1 MEMBER SWAFFAR: No.

2 SECRETARY RICE: No.

3 VICE CHAIR BEHAR: No.

4 CHAIRMAN CHAPMAN: Chair votes no.

5 SECRETARY RICE: It's 15 no; 0 yes; 0

6 absent.

7 CHAIRMAN CHAPMAN: Fifteen no. The

8 motion fails.

9 Ashley?

10 MEMBER SWAFFAR: Great. Back to

11 Jesse, isopropanol.

12 Sorry, you want to read, Clarissa?

13 DR. MATHEWS: Still in Section 205.

14 603, paragraph (a), Alcohols. The listing is

15 isopropanol disinfectant only.

16 MEMBER BUIE: The NOP has allowed

17 isopropanol alcohol use in livestock production

18 for over 20 years. It is used as a disinfectant

19 only. No specific or significant information was

20 presented that warranted removal of the material

21 during the 2017 sunset.

22 Public comments were overwhelmingly in

1 favor of relisting isopropanol.

2 Are there any questions?

3 MEMBER SWAFFAR: Any discussion?

4 (No audible response.)

5 MEMBER SWAFFAR: Tom?

6 CHAIRMAN CHAPMAN: Okay. We have a
7 motion to remove isopropanol from the National
8 List. The motion was made by Jesse and seconded
9 by Harriet. A no vote is to retain; a yes vote
10 is to remove. And the voting will start with
11 Dave.

12 MEMBER MORTENSEN: No.

13 MEMBER ELA: No.

14 MEMBER BRADMAN: No.

15 MEMBER GREENWOOD: No.

16 MEMBER DE LIMA: No.

17 MEMBER SCHWARTZ: No.

18 MEMBER ROMERO-BRIONES: No.

19 MEMBER OAKLEY: No.

20 MEMBER BAIRD: No.

21 MEMBER BUIE: No.

22 MEMBER SWAFFAR: No.

1 SECRETARY RICE: No.

2 VICE CHAIR BEHAR: No.

3 MEMBER SEITZ: No.

4 CHAIRMAN CHAPMAN: Chair votes no.

5 SECRETARY RICE: That's 0 yes; 15 no;

6 0 absent.

7 CHAIRMAN CHAPMAN: Fifteen no. The

8 motion fails.

9 Ashley?

10 MEMBER SWAFFAR: Moving onto aspirin.

11 DR. MATHEWS: The listing in 205.603(a)

12 is aspirin, approved for health care use to

13 reduce inflammation.

14 MEMBER SWAFFAR: Okay. That's my

15 material. So aspirin is an anti-inflammatory

16 drug used for temporary relief of minor aches and

17 pains. I think we all know what that substance

18 does.

19 Overwhelming support in the public

20 comment to relist it, those saying it was

21 critically important to the humane treatment of

22 their animals and it's a widely-available

1 medication for use. So open it up for discussion.

2 Yes, Harriet?

3 VICE CHAIR BEHAR: Since I live and
4 work in a livestock, organic livestock area, this
5 is a very important tool.

6 MEMBER SWAFFAR: Thanks. Anybody
7 else?

8 (No audible response.)

9 MEMBER SWAFFAR: Tom?

10 CHAIRMAN CHAPMAN: So this is a motion
11 to remove aspirin from the National List. The
12 motion is made by Ashley and seconded by Harriet.
13 A no vote is to remove; a yes -- sorry. A no
14 vote is to retain; a yes vote is to remove. And
15 the voting will start with Steve.

16 MEMBER ELA: No.

17 MEMBER BRADMAN: No.

18 MEMBER GREENWOOD: No.

19 MEMBER DE LIMA: No.

20 MEMBER SCHWARTZ: No.

21 MEMBER ROMERO-BRIONES: No.

22 MEMBER OAKLEY: No.

1 MEMBER BAIRD: No.
2 MEMBER BUIE: No.
3 MEMBER SWAFFAR: No.
4 SECRETARY RICE: No.
5 VICE CHAIR BEHAR: No.
6 MEMBER SEITZ: No.
7 MEMBER MORTENSEN: No.
8 CHAIRMAN CHAPMAN: Chair votes no.
9 SECRETARY RICE: That's 0 yes; 15 no;
10 0 absent.
11 CHAIRMAN CHAPMAN: The motion fails.
12 Ashley?
13 MEMBER SWAFFAR: Thanks. Next up is
14 vaccines.
15 Clarissa?
16 DR. MATHEWS: in Section 205.603(a) the
17 listing is biologics, vaccines.
18 MEMBER SWAFFAR: Thank you. Harriet?
19 VICE CHAIR BEHAR: Okay. So this is for
20 relisting of this material that we will be voting
21 on, but in addition we did ask for a work agenda
22 item, which we have put forward to the National

1 Organic Program to deal with somewhat of the
2 inconsistent implementation on whether or not
3 genetically modified vaccines are allowed or not.
4 Some certifiers allow, some do not.

5 In public comment there was universal
6 agreement that this material should remain on the
7 National List. Some commented that it was the
8 most commonly used preventative health care tool.
9 People noted that it's not just for the
10 improvement of the herd as far as not losing
11 animals, but also for long-term genetic
12 improvement, keeping as many of your animals
13 healthy and alive. And as a preventative it's
14 very useful in an organic system.

15 Let's see. Numerous certifiers,
16 advocacy groups and individual livestock
17 operators all spoke to the need for this product
18 and many spoke for the support for the work
19 agenda item. There were not comments against
20 adding this working -- adding to the work agenda,
21 although some commenters were mute.

22 MEMBER SWAFFAR: Thank you, Harriet.

1 We'll open for discussion. Anyone?

2 CHAIRMAN CHAPMAN: There were no
3 comments against adding to the work agenda? I
4 thought I saw some in the written comment.

5 VICE CHAIR BEHAR: I did not see any
6 comments speaking against the work agenda. I did
7 see some commenters who spoke for keeping
8 vaccines on the list and then didn't say anything
9 about the work agenda, and then others who spoke
10 to both issues in support.

11 MEMBER SWAFFAR: Tom, no discussion?
12 Seriously?

13 (No audible response.)

14 MEMBER SWAFFAR: I just wanted to --
15 I'd call on myself then. I just say vaccines are
16 critically important, and I think we heard that
17 overwhelmingly from the public. And I do
18 encourage the program to take a look at our work
19 agenda request item because there is a very
20 different take on this listing across certifiers
21 with some asking if vaccines are -- asking their
22 clients to double-check and see if their vaccines

1 are made from excluded methods whereas others
2 don't address that at all. And so our work agenda
3 request was to help with consistency for everyone
4 throughout different certifiers.

5 Steve?

6 MEMBER ELA: For my own edification,
7 Ashley, and not being a livestock person at all.
8 So are there -- of the vaccines that maybe made
9 using an excluded methods are there alternatives?

10 MEMBER SWAFFAR: For many of those
11 there are not. So what you have to deal with;
12 obviously I understand the poultry vaccines, we
13 are federally mandated by the FDA to give certain
14 vaccines to birds to prevent Salmonella
15 enteritidis, and those are the ones that could be
16 made by excluded methods, and to my knowledge
17 there are no alternatives for those. And there's
18 a few others that are given to poultry also that
19 don't have those.

20 Emily?

21 MEMBER OAKLEY: Do you have any concern
22 that the program won't add this to your work

1 agenda?

2 MEMBER SWAFFAR: Absolutely.

3 MEMBER OAKLEY: Okay. I know that no
4 one from the program who can directly answer that
5 is here right now. I don't want to put Clarissa
6 on the hot seat.

7 Oh, you can answer it?

8 DR. MATHEWS: I can say that the work
9 agenda item request is currently under review and
10 we do anticipate a response fairly soon.

11 MEMBER SWAFFAR: A response that could
12 say no. Yes.

13 MEMBER MORTENSEN: I wonder as we talk
14 about these things could we really speak into the
15 mic? I can't hear most of this discussion.

16 MEMBER OAKLEY: Can I just then
17 clarify? I guess I'm saying that I would echo
18 support for this work agenda item and I think
19 probably many of us would. And if that would be
20 helpful to the program and their deliberations,
21 perhaps we could express that now.

22 MEMBER SWAFFAR: Harriet?

1 VICE CHAIR BEHAR: The work agenda item
2 did specifically discuss the inconsistency
3 between certifiers as well as that it's not our
4 intention to take away either federally-mandated
5 vaccines, nor to take away important tools for
6 producers, but instead to just bring that
7 consistency. Because right now there are some
8 operations that cannot access GMO vaccines.

9 MEMBER SWAFFAR: They're not GMO.
10 They're made from excluded methods. Just want to
11 say that.

12 VICE CHAIR BEHAR: Okay.

13 MEMBER SWAFFAR: Correct terminology.
14 Any further discussion?

15 (No audible response.)

16 MEMBER SWAFFAR: Tom.

17 CHAIRMAN CHAPMAN: So we have a motion
18 to remove biologics, vaccines from the National
19 List. The motion was made by Harriet, seconded
20 by Jesse. A no vote is to retain; a yes vote is
21 to remove. And the voting will start with Asa.

22 MEMBER BRADMAN: No.

1 MEMBER GREENWOOD: No.

2 MEMBER DE LIMA: No.

3 MEMBER SCHWARTZ: No.

4 MEMBER ROMERO-BRIONES: No.

5 MEMBER OAKLEY: No.

6 MEMBER BAIRD: No.

7 MEMBER BUIE: No.

8 MEMBER SWAFFAR: No.

9 SECRETARY RICE: No.

10 VICE CHAIR BEHAR: No.

11 MEMBER SEITZ: No.

12 MEMBER MORTENSEN: No.

13 MEMBER ELA: No.

14 CHAIRMAN CHAPMAN: Chair votes no.

15 SECRETARY RICE: That was 0 yes; 15

16 no; 0 absent.

17 CHAIRMAN CHAPMAN: The motion fails.

18 Ashley?

19 MEMBER SWAFFAR: Okay. Moving onto

20 our next substance, electrolytes.

21 Clarissa?

22 DR. MATHEWS: At section 205.603(a) the

1 listing is electrolytes without antibiotics.

2 MEMBER SWAFFAR: Thank you. Harriet?

3 VICE CHAIR BEHAR: Electrolytes are
4 used extensively for again promotion of health of
5 replacement of vitamins and minerals.

6 And there was universal support from
7 certifiers, advocacy groups, farmer organizations
8 and milk buyers and sellers all there. So
9 basically every aspect of the organic community
10 supported the relisting of electrolytes.

11 MEMBER SWAFFAR: Thank you, Harriet.

12 Open it up. Any discussion?

13 (No audible response.)

14 MEMBER SWAFFAR: Great.

15 Tom?

16 CHAIRMAN CHAPMAN: So we have a
17 seconded motion from the Subcommittee. The motion
18 is to remove electrolytes from the National List.
19 The motion was made by Harriet and seconded by
20 Dan. A yes vote is to remove; a no vote is to
21 retain. And the voting will start with Rick.

22 MEMBER GREENWOOD: No.

1 MEMBER DE LIMA: No.
2 MEMBER SCHWARTZ: No.
3 MEMBER ROMERO-BRIONES: No.
4 MEMBER OAKLEY: No.
5 MEMBER BAIRD: No.
6 MEMBER BUIE: No.
7 MEMBER SWAFFAR: No.
8 SECRETARY RICE: No.
9 VICE CHAIR BEHAR: No.
10 MEMBER SEITZ: No.
11 MEMBER MORTENSEN: No.
12 MEMBER ELA: No.
13 MEMBER BRADMAN: No.
14 CHAIRMAN CHAPMAN: Chair votes no.
15 SECRETARY RICE: That was 0 yes; 15 no;
16 and 0 absent.
17 CHAIRMAN CHAPMAN: The motion fails.
18 Ashley?
19 MEMBER SWAFFAR: Thank you. Moving on
20 next to glycerin.
21 Clarissa?
22 DR. MATHEWS: At Section 205.603(a) the

1 listing is glycerin allowed as a livestock teat
2 dip. Must be produced through the hydrolysis of
3 fats or oils.

4 MEMBER SWAFFAR: Thanks. Moving on.
5 Sue?

6 MEMBER BAIRD: Glycerin is a byproduct
7 of the soap manufacturing process. It can be
8 either done synthetically or by natural
9 hydrolysis, therefore the reason for the
10 annotation. It is used extensively in teat dips
11 either as the sole component or as an ingredient
12 in others, including chlorhexidine.

13 There was actually 18 comments and all
14 of them were in support of using and relisting
15 glycerin on the National List. Beyond Pesticides
16 did want more clarification on the process of
17 fermentation which is not addressed in this.

18 MEMBER SWAFFAR: Thank you, Sue.

19 Opening it up for discussion. Anyone?
20 Tom?

21 CHAIRMAN CHAPMAN: I mean, just as a
22 procurer of glycerin in my day job there's -- the

1 fermentation segment of the glycerin supply chain
2 is small to non-existent. It is almost all a
3 product of the soap industry and other industries
4 like that, but fermentation is a very, very small
5 subsection.

6 MEMBER SWAFFAR: Thank you.

7 Any further discussion?

8 (No audible response.)

9 MEMBER SWAFFAR: Great.

10 Tom?

11 CHAIRMAN CHAPMAN: So this is a motion
12 that comes from the -- a seconded motion that
13 comes from the -- a seconded motion that comes
14 from the Subcommittee. The motion is to remove
15 glycerin. The motion was made by Sue and
16 seconded by Harriet. The motion is to remove
17 glycerin from the National List. A yes vote is
18 to remove; a no vote is to retain. And the
19 voting will start with Lisa.

20 MEMBER DE LIMA: No.

21 MEMBER SCHWARTZ: No.

22 MEMBER ROMERO-BRIONES: No.

1 MEMBER OAKLEY: No.

2 MEMBER BAIRD: No.

3 MEMBER BUIE: No.

4 MEMBER SWAFFAR: No.

5 SECRETARY RICE: No.

6 VICE CHAIR BEHAR: No.

7 MEMBER SEITZ: No.

8 MEMBER MORTENSEN: No.

9 MEMBER ELA: No.

10 MEMBER BRADMAN: NO.

11 MEMBER GREENWOOD: No.

12 SECRETARY RICE: That's 0 yes; 15 no;

13 and 0 absent.

14 CHAIRMAN CHAPMAN: The motion fails.

15 Ashley?

16 MEMBER SWAFFAR: Great. Moving on to

17 phosphoric acid.

18 Clarissa?

19 DR. MATHEWS: At Section 205.603(a) the

20 listing is phosphoric acid allowed as an

21 equipment cleaning provided that no direct

22 contact with organically-managed livestock or

1 land occurs.

2 MEMBER SWAFFAR: Thank you. Moving on,
3 Dan? Dan?

4 MEMBER SEITZ: So phosphoric acid is
5 allowed as an equipment cleaner provided that no
6 direct contact with organically-managed livestock
7 or land occurs

8 There were 15 comments on this all in
9 favor of continued listing. The substance is not
10 without some problems. It can be harmful to
11 health and the environment. Nonetheless it's
12 considered by all commenters as being essential.
13 A couple of commenters noted that there is some
14 inconsistency among certifiers regarding whether
15 there should be a rinse after use and this
16 inconsistency comes from the fact that some of
17 the phosphorous materials have inert ingredients
18 included with them. So there were a couple of
19 commenters who suggested that there be an
20 annotation made for this substance in the future.

21 MEMBER SWAFFAR: Okay. Opening it up to
22 discussion.

1 Harriet?

2 VICE CHAIR BEHAR: Since I live in an
3 organic dairy area this is an essential
4 ingredient both on the farm and in processing, if
5 it's a non-farm processing, for removal of milk
6 stone in the pipelines.

7 MEMBER SWAFFAR: Any further
8 discussion?

9 (No audible response.)

10 MEMBER SWAFFAR: I would just like to
11 say hopefully the Materials Committee can look at
12 this also in their sanitizer review and we'll go
13 from there. Great.

14 Turning it back, Tom.

15 CHAIRMAN CHAPMAN: So we have a
16 seconded motion from the Subcommittee. The motion
17 is to remove phosphoric acid from the National
18 List. The motion was made by Dan and seconded by
19 Harriet. A yes vote is to remove; a no vote is to
20 retain, and the voting will start with Eric.

21 MEMBER SCHWARTZ: No.

22 MEMBER ROMERO-BRIONES: No.

1 MEMBER OAKLEY: No.

2 MEMBER BAIRD: No.

3 MEMBER BUIE: No.

4 MEMBER SWAFFAR: No.

5 SECRETARY RICE: No.

6 VICE CHAIR BEHAR: No.

7 MEMBER SEITZ: No.

8 MEMBER MORTENSEN: No.

9 MEMBER ELA: No.

10 MEMBER BRADMAN: No.

11 MEMBER GREENWOOD: No.

12 MEMBER DE LIMA: No.

13 CHAIRMAN CHAPMAN: Chair votes no.

14 SECRETARY RICE: That's 0 yes; 15 no;

15 0 absent.

16 CHAIRMAN CHAPMAN: Motion fails.

17 Ashley?

18 MEMBER SWAFFAR: Thank you. Moving onto

19 hydrated lime.

20 Clarissa?

21 DR. MATHEWS: At Section 205.603,

22 paragraph (b) is Topical Treatment External

1 Parasiticide or Local Anesthetic as Applicable,
2 the listing is lime, hydrated as an external pest
3 control not permitted to cauterize physical
4 alterations or deodorize animal wastes.

5 MEMBER SWAFFAR: Thank you. A-dae?

6 MEMBER ROMERO-BRIONES: Lime, hydrated
7 is primarily used to control pests, and I
8 emphasize that it is not permitted for use as --
9 to cauterize physical alterations or deodorize
10 animal wastes.

11 The majority of comment were in favor
12 of relisting. The Subcommittee discussed a
13 possible annotation. One commenter suggested that
14 that is outside the purview of the Subcommittee,
15 but the majority suggested relisting.

16 MEMBER SWAFFAR: Great. Open it up for
17 discussion. Anyone?

18 (No audible response.)

19 MEMBER SWAFFAR: I just want to say why
20 we added that annotation part in there was
21 because some certifiers have written in that
22 hydrated lime -- many producers want to use it in

1 bedding for deodorizing animal waste, so we were
2 looking to get comments there, and we did from
3 one certifier that the operations that they work
4 with do request hydrated lime to be used for
5 bedding and for whitewash to help with
6 deodorizing animal waste. So we will talk about
7 that as a Subcommittee if we want to work on that
8 annotation.

9 Any other discussion?

10 Harriet?

11 VICE CHAIR BEHAR: Well, this is one of
12 the strengths of our National List, that it -- if
13 there was -- if it was going to be used in
14 bedding, it would probably have to be -- have
15 discussion with the Crops Subcommittee because of
16 the effect that that bedding is not just going --
17 it's going to go out on the land. So that's one
18 of the reasons I think it was not. So you can use
19 hydrated lime on organic land -- I mean, on
20 organic crops and livestock for those specific
21 uses. So that is a strength in our National List
22 that we can identify the specific areas and then

1 prohibit it in other areas.

2 MEMBER SWAFFAR: Thank you. No further
3 discussion.

4 Tom?

5 CHAIRMAN CHAPMAN: So it's a motion
6 that comes from the Subcommittee. The motion is
7 to remove hydrated lime. The motion was made by
8 A-dae and seconded by Jesse. A yes vote is to
9 remove; a no vote is retain, and the voting will
10 start with A-dae.

11 MEMBER ROMERO-BRIONES: No.

12 MEMBER OAKLEY: No.

13 MEMBER BAIRD: No.

14 MEMBER BUIE: No.

15 MEMBER SWAFFAR: No.

16 SECRETARY RICE: No.

17 VICE CHAIR BEHAR: No.

18 MEMBER SEITZ: No.

19 MEMBER MORTENSEN: No.

20 MEMBER ELA: No.

21 MEMBER BRADMAN: No.

22 MEMBER GREENWOOD: No.

1 MEMBER DE LIMA: No.

2 MEMBER SCHWARTZ: No.

3 CHAIRMAN CHAPMAN: Chair votes no.

4 SECRETARY RICE: That's 0 yes; 15 no;
5 0 absent.

6 CHAIRMAN CHAPMAN: The motion fails.

7 Ashley?

8 MEMBER SWAFFAR: Moving onto mineral
9 oil.

10 Clarissa?

11 DR. MATHEWS: At Section 205.603(b) the
12 listing is mineral oil for topical use and as a
13 lubricant.

14 MEMBER SWAFFAR: Thank you. A-dae?

15 MEMBER ROMERO-BRIONES: So mineral oil
16 acts as an external parasiticide when applied
17 topically to animals infested with mites, lice
18 and other parasites.

19 The majority of commenters suggested
20 relisting. One commenter wanted some
21 clarification on the FDA listing because NOP was
22 informed that mineral oil was not received -- has

1 not received approval through the FDA drug
2 approval process for external label use by
3 licensed veterinarians, but the majority
4 suggested relisting.

5 MEMBER SWAFFAR: Any discussion?

6 Harriet?

7 VICE CHAIR BEHAR: So this is an
8 illustration that even if the NOSB requires
9 something that the FDA and other areas within the
10 USDA and the Federal Government have to also
11 approve that use in order for it to be used in
12 organic production. So even though the NOSB in
13 response to producer requests voted to allow it
14 for release of constipation, it was not approved
15 by FDA. So it can't -- it's not allowed to be
16 used.

17 MEMBER SWAFFAR: Devon, you want to say
18 anything about that?

19 MR. PATTILLO: I think mineral oil is
20 one of the substances that's in a proposed rule
21 right now, and while it's -- I believe there are
22 off-label uses allowed at veterinarian

1 discretion.

2 PARTICIPANT: (Off microphone
3 comments.)

4 MR. PATTILLO: I believe under FDA
5 regulations veterinarians are allowed to use
6 substances for off-label uses in certain
7 circumstances. I believe in the proposed rule we
8 have some discussion about the FDA approval of --
9 and their -- I guess their perspective on these
10 uses.

11 MEMBER SWAFFAR: And for clarification
12 one of those uses would be an oral use for
13 impaction.

14 So, Harriet?

15 VICE CHAIR BEHAR: Just for
16 clarification mineral oil is a petroleum product.

17 MEMBER SWAFFAR: Steve?

18 MEMBER ELA: So just so I'm clear, but
19 the use externally as we read is approved by FDA?
20 So it's just that for impaction or -- that is on
21 the -- in the question mark?

22 MEMBER SWAFFAR: Well, and like Devon

1 side, there is some approval for off-label use
2 for veterinarians by the FDA. And that comes in
3 the new set of rulemaking stuff, so they will
4 have a discussion in there. But it's also used
5 for lubrication and various other uses also.

6 Harriet?

7 VICE CHAIR BEHAR: So the lubrication
8 is typically used by technicians who are doing
9 artificial insemination, and so they're -- if
10 you've never stuck your arm in a cow, it's quite
11 an experience.

12 MEMBER SWAFFAR: We'll leave it at that
13 image.

14 Back to you, Tom.

15 CHAIRMAN CHAPMAN: We have a motion to
16 remove mineral oil. It's a seconded motion that
17 came from the Subcommittee. The motion was made
18 by A-dae and seconded by Sue. A no vote is to
19 retain; a yes vote is remove, and the voting will
20 start with Emily.

21 MEMBER OAKLEY: No.

22 MEMBER BAIRD: No.

1 MEMBER BUIE: No.
2 MEMBER SWAFFAR: No.
3 SECRETARY RICE: No.
4 VICE CHAIR BEHAR: No.
5 MEMBER SEITZ: No.
6 MEMBER MORTENSEN: No.
7 MEMBER ELA: No.
8 MEMBER BRADMAN: No.
9 MEMBER GREENWOOD: No.
10 MEMBER DE LIMA: No.
11 MEMBER SCHWARTZ: No.
12 MEMBER ROMERO-BRIONES: No.
13 CHAIRMAN CHAPMAN: Chair votes no.
14 SECRETARY RICE: That's 0 yes; 15 no;
15 0 absent.
16 CHAIRMAN CHAPMAN: Motion fails.
17 Ashley?
18 MEMBER SWAFFAR: Moving onto sucrose
19 octanoate esters or from here on out SOEs.
20 Clarissa?
21 DR. MATHEWS: At Section 205.603(b) the
22 listing is sucrose octanoate esters, CAS No's.

1 42922-74-7 and 58064-47-4, in accordance with
2 approved labeling.

3 MEMBER SWAFFAR: Thank you.

4 Moving to Sue.

5 MEMBER BAIRD: Yes, SOEs are -- belong
6 to the organic chemical family bonding sucrose
7 fatty acid esters and they're manufactured from
8 sucrose, table sugar, and octanoic acid esters.
9 They're registered as a biopesticide, but in this
10 particular -- because we are addressing it as
11 livestock, it's addressed for varroa mite control
12 in honeybees. It has been listed -- and it is
13 listed by EPA a such.

14 There were seven public comments, but
15 the two that were most pertinent, in my mind at
16 least, was Beyond Pesticides said because they
17 had supported continuing to keep it on the list
18 and they said they're disappointed that they
19 haven't seen any comments from beekeepers
20 regarding the efficacy and hazard of SOEs in
21 controlling varroa mites. And they made the
22 comment they'd heard informally that beekeepers

1 don't use it because it's too hard to use.

2 And then NOC, National Organic
3 Consumers, made the point that the Environmental
4 Protection Agency, even though it's approved for
5 use, they don't have any currently listed or
6 approved products that are to be used. So they
7 thought that -- both of those thought that it
8 should be removed.

9 MEMBER SWAFFAR: Open it up for
10 discussion.

11 Harriet?

12 VICE CHAIR BEHAR: So I was one of the
13 people who voted yes to remove this product. I'm
14 pretty sure I might be the only beekeeper on the
15 Board. I have used this product myself. And when
16 we were voting on it we did not have certain
17 information. In the oxalic acid technical review
18 there was a notation that the other product --
19 one of the other products on the National List
20 for control of varroa mites, SOEs, was no longer
21 registered by the EPA. There was no product
22 registered by the EPA for use and that the

1 product itself was ineffective in controlling
2 varroa mite.

3 And so we could possibly deduce from
4 that that the reason why there's no products
5 registered is because nobody was buying it
6 because it was ineffective. So there's a question
7 of even if the product could be considered
8 somewhat benign, if no one can actually use it in
9 the United States, if there are no products --
10 because the EPA doesn't have anything registered,
11 and if there are no products available and it's
12 ineffective, why is it taking up space on the
13 National List?

14 Because during our deliberations for
15 new products to put on the National List we
16 always look to see if there are other products
17 available. And so having a product that's
18 actually not available and that nobody would
19 actually want to use and having used it myself
20 once, I would tell you I don't want to use it
21 again. It is very hard on the bees. It's very,
22 very difficult to use. It makes a total mess.

1 And it kills bees, so we don't want to be doing
2 that. So I would -- I'm planning on voting yes
3 for removal for this product for those reasons.

4 In addition, we spoke during the
5 Subcommittee calls about use in other countries.

6 And so I'm not sure if Sue did any work, but I
7 reached out to various certifiers, and I know
8 Ashley also asked a certifier during the public
9 -- you asked Sam Welsch of OneCert. He was one of
10 the people I also reached out to. I spoke to
11 organic inspectors, or emailed, and asked them if
12 they had seen any use in other countries. And I
13 also spoke with a seller of organic honey coming
14 from Brazil and he said he didn't know of his
15 suppliers using it.

16 So by taking it off the National List
17 I don't believe we're doing any harm or removing
18 anything essential from the National List for
19 either domestic or international honeybee
20 production.

21 MEMBER SWAFFAR: Tom?

22 CHAIRMAN CHAPMAN: So look at ERS

1 import data, the vast majority of honey appears
2 to come from Brazil. I don't see any comments
3 from certifiers in Brazil about honey. Did you --
4 which -- I mean, are you able to share the
5 specific certifiers that spoke to its non-usage?

6 VICE CHAIR BEHAR: I talked with
7 company called Suranda.

8 CHAIRMAN CHAPMAN: Okay.

9 VICE CHAIR BEHAR: And they -- he's
10 actually a Brazilian and then he then asked
11 around.

12 CHAIRMAN CHAPMAN: Okay.

13 VICE CHAIR BEHAR: They import organic
14 honey from Brazil.

15 CHAIRMAN CHAPMAN: Yes, Suranda is an
16 American company, but in pulling data off of the
17 OID, I mean 85 percent of the honey producers in
18 Brazil are certified by IBD. I was unable to
19 reach IBD, so I just haven't been able to verify
20 that it's not used in Brazil.

21 MEMBER SWAFFAR: Harriet?

22 VICE CHAIR BEHAR: SOEs are not on the

1 European Union approved list of products.

2 CHAIRMAN CHAPMAN: Is Brazil in the
3 European Union?

4 VICE CHAIR BEHAR: I don't know, but if
5 anyone's selling into the EU, they would not be
6 able to use it for organic production either.

7 I think really more than whether or
8 not it would be allowed there to me is if it's
9 ineffective, I just think that eventually, even
10 if some people are using it, they'll probably
11 stop using it, which again was my experience. And
12 there are much better products for the control of
13 varroa mite that I'd rather see those be on the
14 National List rather than saying, well, we
15 already formic acid and sucrose octanoate esters,
16 so why do we need oxalic, for instance?

17 So, and I think too with consistency
18 with the rest of the -- of the U.S. regulatory
19 agencies if our EPA doesn't have anything
20 registered, again why would we have something on
21 our list, similar to what we just discussed with
22 mineral oil.

1 MEMBER BAIRD: And I don't -- I'm
2 sorry, did you say yes? Did you call me or not?

3 MEMBER SWAFFAR: Dave was on the list,
4 but I just want to remind board members to please
5 talk into the mics.

6 Dave was next.

7 MEMBER MORTENSEN: Yes, I just was
8 doing some Googling last night, nursing my cold
9 and reading about these compounds. Marla Spivak
10 at the University of Minnesota is like a
11 nationally renowned beehive manager, bee
12 community ecologist, and she pretty much echoes
13 what Harriet just said about it being hard on
14 bees and that there are other things that are
15 more effective and less hard on bees. And so with
16 that in mind I was left with the impression that
17 this is not something that we keep on the list.

18 MEMBER SWAFFAR: Thank you.

19 Sue?

20 MEMBER BAIRD: Well, perhaps I've just
21 changed my mind. I was -- my point was that it
22 did -- the review said that it was relatively

1 benign. In fact really benign on bees. You're
2 saying that science says that's not true, so I'm
3 not sure.

4 I've thought about this a lot and the
5 point is made that it's hard to use. I always
6 hesitate -- and I also understand Harriet's
7 argument that we could have other things on there
8 if we take this off. I don't think that's ever
9 been a criteria. We can put another thing on
10 without taking something off. I'm always afraid
11 to take something out of the toolbox. There are
12 so few products out there. It is registered by
13 EPA. There's no specific product that has been
14 listed by EPA, but it is registered by EPA, and I
15 think that's a point that might be taken. I just
16 hate to take things off when someday -- maybe
17 we're not using it now, but maybe someday we need
18 it. I don't know.

19 MEMBER SWAFFAR: Emily?

20 MEMBER OAKLEY: I know that we can't
21 necessarily quantify its use in Brazil, Tom, but
22 I think in the absence of use here or in the

1 absence of comments from producers there I think
2 this is actually great example of the sunset
3 process and our ability to review materials for
4 their effectiveness and their use. And I think
5 should it become more widespread or used at all,
6 to our knowledge in the future, it can always be
7 re-petitioned for use. But I think this is an
8 example of a compelling reason to remove
9 something.

10 MEMBER SWAFFAR: Thank you.

11 Scott?

12 SECRETARY RICE: I just was -- is there
13 any reason to think efficacy would be different
14 on -- in the environment in Brazil than here in
15 the U.S.? I don't know if anybody has -- sounds
16 like we just don't have that data. That was
17 something that occurred to me.

18 I just had a thought on any -- is
19 there any reason to believe that efficacy would
20 be different on bees in Brazil? If -- I know that
21 we've heard efficacy is limited here, but that
22 would just be a concern of mine in terms of

1 removing a tool if it's working elsewhere.

2 MEMBER SWAFFAR: Tom?

3 CHAIRMAN CHAPMAN: Yes, I mean, so from
4 what I've read on this and what -- from the
5 Subcommittee, I mean, it seems there's two
6 arguments here: There's the efficacy argument,
7 which seems to be a very valid argument for
8 potentially delisting this material. And then
9 there's the use argument. I guess I just want to
10 point out that several members of this Board have
11 pointed out the fact that it's difficult for us
12 to get feedback from members of the community,
13 small farmers here in the U.S., small farmers
14 abroad.

15 We saw the organization that went in
16 to get the Costa Rican contingent here from Costa
17 Rica. And this isn't -- the honey produced in
18 Brazil is not being produced in Sao Paulo. It's
19 not being produced in Rio de Janeiro. It's
20 produced far out in the Amazon so it can comply
21 with the large non-production areas, non-
22 conventional production areas for the bees to

1 forage. And so you're talking about very rural,
2 very small, very far out apiary production to get
3 the majority of honey that comes here.

4 So I wouldn't -- I just warn us
5 against using -- weighing that reason too heavily
6 given I don't know how effective our 16-day
7 comment period was to get out to those folks in
8 that rural area.

9 MEMBER SWAFFAR: Harriet?

10 VICE CHAIR BEHAR: To respond to Scott
11 about the efficacy, would it be different in
12 another region, having again used the product, I
13 would say no. A big part of the reason it's so
14 hard to use it's extremely sticky. I don't really
15 believe it would be less sticky in a tropical
16 climate.

17 And in our deliberations we do look at
18 items on the National List. Just in Livestock we
19 have looked at a whole variety of various teat
20 dips and the fact that there's four or five
21 already on the list, and then we try to compare
22 is this one needed? We do look at if something is

1 already on the list. So there could be two, three
2 more materials that come forward for varroa mite
3 control. And again, if it's not effective and
4 there's nothing -- and I believe that there's
5 nothing registered is because nobody was buying
6 it, and so they didn't choose to relist or re-
7 register with the EPA. I think just -- I don't
8 think it necessarily belongs.

9 And then lastly there are also
10 systems-based approaches to control a varroa
11 mite. My husband just walked in and he helps me.
12 We work together on various types of varroa mite
13 control which in conjunction with materials have
14 kept our bees fairly healthy. So there isn't just
15 only reliance on materials for control of this
16 insect pest.

17 MEMBER SWAFFAR: Dave?

18 MEMBER MORTENSEN: Yes, I guess just to
19 Tom's point and -- which I think is an excellent
20 one, but -- and I realize ethylene is an
21 extraordinary exception. I mean, we had 10 or so
22 people coming from another country to speak to us

1 about it. It seems to be that we should have at
2 least one comment from a beekeeper or someone, or
3 a company that sells honey from the beekeepers
4 that they've purchased from on behalf of those
5 growers. Yes, because even in our debate about
6 paper pots and all of that, we got lots and lots
7 of comments on that, I think. Did it rise to the
8 level of a letter to the Secretary of
9 Agriculture? No, but the comment are there.

10 So I think the absence of comments
11 left me thinking this certainly can't be a very
12 compelling product to have on the market for
13 beekeepers.

14 MEMBER SWAFFAR: I'm going to call on
15 myself and then I'll call on Harriet.

16 So I'm a little torn on this material.
17 I was a vote on the Subcommittee to relist, but I
18 think there are several things of why we're not
19 getting comments that we're hearing from and that
20 is because we don't produce that much honey in
21 the U.S., organic, because we don't have
22 apiculture standards. And that is my biggest pet

1 peeve about this material and the new petition
2 material is we do not have standards, but people
3 are petitioning us items to use for those
4 standards.

5 I fought on Livestock to even accept
6 the petition for oxalic acid because we don't
7 have bee standards. So a little pet peeve of
8 mine. But so I think that's why we're not hearing
9 any comments from producers is because we don't
10 really have that much bee production in the U.S.
11 Most of it comes from Brazil. And to Tom's point,
12 those folks aren't involved in our process.

13 But I am torn on this material because
14 it's not registered with the EPA. It doesn't
15 sound like it works for bee producers that do use
16 it here in the U.S. And I think we have some
17 other options that they could be using, so I feel
18 like I'm going to -- I will be switching my vote.
19 I voted to relist, but I will be voting to delist
20 this material.

21 Sorry. Harriet?

22 VICE CHAIR BEHAR: Just to remind us

1 all that we did have a previous review comment
2 period in the spring and we didn't hear anything.
3 We do have a fairly active organic honey industry
4 in Hawaii, which is part of the United States,
5 and they have brought petitions forward and are
6 paying attention, and yet we did not see any
7 support for this product from the organic honey
8 producers in Hawaii.

9 MEMBER SWAFFAR: Steve?

10 MEMBER ELA: A question maybe for Tom,
11 I don't know. I mean, if -- those Brazilian
12 growers, are they certifying to the U.S.
13 standards?

14 CHAIRMAN CHAPMAN: Yes. I mean, that
15 data I cited with the certifiers was from the
16 Organic Integrity Database.

17 MEMBER ELA: Okay.

18 MEMBER SWAFFAR: Great. Any further
19 discussion?

20 (No audible response.)

21 MEMBER SWAFFAR: Tom?

22 CHAIRMAN CHAPMAN: Okay. We have a

1 motion to remove sucrose octanoate esters from
2 the National List. It's a seconded motion from
3 the Subcommittee. The motion was made by Sue and
4 seconded by Jesse. A yes vote is to remove; a no
5 vote is to retain, and the voting will start with
6 Sue.

7 MEMBER BAIRD: This is a hard one, but
8 I'll still going to say no.

9 MEMBER BUIE: Also, but no

10 MEMBER SWAFFAR: Yes.

11 SECRETARY RICE: Yes.

12 VICE CHAIR BEHAR: Yes.

13 MEMBER SEITZ: Yes.

14 MEMBER MORTENSEN: Yes.

15 MEMBER ELA: Yes.

16 MEMBER BRADMAN: Yes.

17 MEMBER GREENWOOD: Yes.

18 MEMBER DE LIMA: No.

19 MEMBER SCHWARTZ: No.

20 MEMBER ROMERO-BRIONES: Yes.

21 MEMBER OAKLEY: Yes.

22 CHAIRMAN CHAPMAN: Chair votes no.

1 SECRETARY RICE: That was 9 yes; 5 no
2 -- no -- technical difficulties here. That was 10
3 yes; 5 no; 0 absent.

4 CHAIRMAN CHAPMAN: The motion passes.
5 Ashley?

6 MEMBER SWAFFAR: Moving onto our
7 petitioned material. No introduction, so we'll
8 just go right into Harriet.

9 VICE CHAIR BEHAR: Okay. Oxalic acid.
10 Let's stay in the beekeeping world.

11 So this is actually the first time any
12 subcommittee has done this, so just so the public
13 knows that we decided that if we receive a
14 petition but we cannot move through our entire
15 process of a technical review and then a vote
16 from Subcommittee to the full Board, we thought
17 we would then just bring forward a discussion
18 document so people could see the materials that
19 are under review and get yet one more shot at
20 giving us input. So there will be probably a
21 petition proposal coming forward in the spring on
22 this item. We actually did just receive the

1 technical review for this material.

2 But we -- as far as -- the only
3 comments that were received I saw were that we
4 need apiculture standards, which I wholeheartedly
5 agree. And I have tried to speak to the program
6 about whether -- why this is not moving forward,
7 but it really is not a priority I think partially
8 because of what Ashley said, that there is not a
9 clamoring for them within the borders of the
10 United States. However, there are beekeepers who
11 would like organic standards. There are
12 certifiers who have standards. And so therefore
13 having a material on the National List would be
14 useful to beekeepers within our borders and of
15 course those who sell into our market.

16 Oxalic acid is an acid similar to
17 formic acid which is on our National List. It can
18 be applied to the hive in two ways: in a sugar
19 syrup that then trickles down between the frames
20 and as a vapor treatment.

21 There are tools that beekeepers can
22 either make or purchase that vaporize the oxalic

1 acid. And if you've ever seen a beehive, there's
2 a small entrance in the bottom. You put the
3 vaporizer in and then that vapor moves up and
4 that causes the mites to fall off the bees.
5 Typically the beekeeper has a screened bottom
6 board where those mites fall through and
7 underneath the hive. And they don't crawl back
8 up, which is kind of a nice thing. We just don't
9 want to have mites that can crawl around.

10 The other use for it which I found to
11 be quite interesting and that there is no other
12 product available is that it could also be put in
13 a sugar syrup and sprayed on packaged bees. So
14 when beekeepers need to replace bees at times,
15 they can purchase a queen and a package of bees
16 usually in a screened box. And many times they
17 will arrive from infested hives and be full of
18 mites. And so the person buying those packages --
19 basically that package will die and they've spent
20 \$120 or whatever for that package. So this is a
21 way for people who are selling packages to be
22 able to then remove the mites and sell a cleaner

1 product to those buying those replacement bees.

2 There is a concern that the material
3 is categorized as very hazardous by the EPA
4 because it is an acid. It also used for bleaching
5 wood, although it's somewhat of a different
6 formulation than what is being requested for use
7 for control of varroa mites in organic honeybee
8 hives.

9 And we did ask a couple of questions
10 for the public and we did not get any response to
11 those questions, I think because there were no
12 beekeepers.

13 As the lead for this product I'm going
14 to reach out, and once we get the TR and ask
15 maybe some more specific questions, just on my
16 own just to see what the demand is for it. And I
17 will reach out to Brazil as well.

18 You can even help me, Tom, with some
19 contacts. I would appreciate that.

20 However, I do know that in my little
21 bee club in Southwest Wisconsin we have discussed
22 this material extensively. We've seen vaporizing

1 equipment and we've talked to beekeepers that
2 feel it's very effective and have used it
3 continuously for a few years. So it is
4 effective. It can be used. It's accessible.
5 And I think that was a homemade vaporizer, so
6 fairly inexpensive.

7 MEMBER SWAFFAR: Thanks, Harriet.
8 That was -- you told me it would be short and
9 sweet. I'd hate to see long.

10 So just to remind everyone, we are not
11 voting on this. We're just discussing it and
12 we'll come back after we receive a TR, maybe not
13 spring, maybe fall.

14 Dave?

15 MEMBER MORTENSEN: Yes, in the reading
16 that I've done on this; and I did talk to a
17 beekeeper before I left the East, this compound
18 is much more useful for varroa mite management in
19 a hive. It's a little worrying to be thinking
20 about the protective gear that you're wearing,
21 and I was just imagining also you're working with
22 bees. I guess this maybe happens when you're not

1 worried about also being protected from working
2 with the bees themselves. It sounds clunky from
3 a management point of view, but it's apparently
4 much more effective in an integrated pest
5 management program for hive management.

6 MEMBER SWAFFAR: Anyone else?

7 (No audible response.)

8 MEMBER SWAFFAR: I just want to echo
9 what I said earlier about SOEs. I'm very
10 hesitant to be working on items for apicultures
11 when we do not have standards from the program.
12 So I'd like to ask the program to please move
13 forward because there are people certifying and
14 selling organic honey without standards.

15 Okay. And that's it on that
16 discussion. The Livestock Committee will now
17 move onto other business that we have.

18 If I could have the next slide? So
19 we've talked to and we've heard lots of comments
20 from the public at this meeting and prior
21 meetings about origin of livestock and how it's a
22 problem that the program is not moving forward to

1 that.

2 So we've talked internally and we'd
3 like to put forward a resolution, and that
4 resolution states that it has come to the
5 attention of the National Organic Standards Board
6 that the continued state of varying interruptions
7 -- interpretations of practices around the origin
8 of livestock standards is creating market
9 instability for organic producers. The 2015 USDA
10 origin of livestock proposed rule was based on
11 six recommendations from the NOSB between 1994
12 and 2006.

13 The proposed rule responds to findings
14 from the July 2013 USDA Office of Inspector
15 General audit report on organic milk operations
16 stating that certifying agents were interpreting
17 the origin of livestock requirements differently.

18 Rulemaking is necessary to ensure
19 consistent interpretation and enforcement of the
20 standards for origin of livestock and provide
21 industry with additional clarity of application
22 of the organic dairy standards.

1 In early 2017 the origin of livestock
2 proposed rule was removed from the Government's
3 Unified Agenda Regulatory and Deregulatory
4 actions. Support for this rule has been
5 expressed through public comment by the majority
6 of organic stakeholders. Strong federal
7 oversight is essential for fair consistent
8 certification and for creating a level playing
9 field for all certified operations.

10 So therefore be it resolved by
11 unanimous vote the National Organic Standards
12 Board as USDA's Federal Advisory Board on Organic
13 Issues and representing organic farmers,
14 ranchers, processors, retailers and consumers
15 urges the Secretary to directly issue a final
16 rule for origin of livestock that incorporates
17 public comments submitted in response to the
18 proposed rule.

19 So that is other business.

20 Harriet?

21 VICE CHAIR BEHAR: I enthusiastically
22 second this motion.

1 MEMBER SWAFFAR: Great. Open it up
2 for discussion.

3 Emily?

4 MEMBER OAKLEY: I also
5 enthusiastically support this resolution. And I
6 have a question about the possibility of its
7 delivery to the Secretary and how that takes
8 place.

9 MEMBER SWAFFAR: Jenny?

10 DR. TUCKER: So after every NOSB
11 meeting we go back and brief our leadership on
12 what happened during the meeting, what they key
13 issues were. Clearly two of those coming out of
14 this meeting will be paper pots and origin of
15 livestock. And so this will be communicated up
16 the chain through our standard briefing process,
17 so this will be shown to first the administrator.
18 And then it will go up the ladder from there.

19 MEMBER SWAFFAR: Emily?

20 MEMBER OAKLEY: Just a follow-up. I
21 don't know about precedents or effectiveness, but
22 would it be effective for this to be delivered or

1 is it even appropriate for it to be delivered
2 directly from the NOSB to the Secretary?

3 DR. TUCKER: In the past it has been
4 more effective to communicate through the program
5 so that we can sort of present the work of the
6 Board in context and so within the framework of
7 the advisory board, the chain of command and
8 operations.

9 MEMBER SWAFFAR: Harriet?

10 VICE CHAIR BEHAR: I would like also
11 for the Secretary to know that the NOP's slogan
12 is "Consumers Trust the Organic Label," and it's
13 through consistency that that trust is imbedded.
14 And so we're asking for consistency here, and the
15 way it comes is through rulemaking and
16 enforcement. And so we really would like to see
17 this happen.

18 Yes, it's true that there is great
19 hardship out in the organic dairy farms, having
20 -- I inspect them, I live with them, they're my
21 neighbors. But also to me it's that protection
22 of our label, that we have that integrity and

1 that consistency. So I encourage you to
2 enthusiastically bring it forward.

3 DR. TUCKER: And so let me also sort
4 of continue with what the next step would be. So
5 we'd brief it up the chain. It is -- we're --
6 it's the end of October here. The next window
7 for the Unified Regulatory Agenda is the
8 administration will start to consider items that
9 are elevated from the programs or proposed from
10 the programs sometime in January. And so that's
11 when those conversations will begin to occur.

12 Now the regulatory approach, there is
13 -- remains the two for one regulations or set of
14 principles related to regulation. So this rule
15 would be evaluated against other rules being
16 considered at -- across the agency and department
17 in developing their regulatory agenda for the
18 spring.

19 MEMBER SWAFFAR: So I had Tom next.

20 CHAIRMAN CHAPMAN: So it's a good
21 thing we voted sucrose octanoate esters off the
22 list. That's one. We just need to get to one

1 more.

2 (Laughter.)

3 CHAIRMAN CHAPMAN: Jenny is not
4 laughing at that comment.

5 I do want to echo my support for this
6 as well as point that -- point out that OFPA does
7 in its purpose lay out that one of the purposes
8 of OFPA is to assure that the organic products
9 are produced, meet a consistent standard. And
10 from the feedback that we've heard from the
11 public, that just does not seem to be the case
12 when it comes to the origin of livestock.

13 The NOSB has kind of done its work
14 here in the past and I would hope that the USDA
15 hears the community, the industry, the retailers,
16 the processors, the ranchers about the need for
17 this to go forward so that clarity can be brought
18 to this section of the standard

19 MEMBER SWAFFAR: Dan?

20 MEMBER SEITZ: So this is a question
21 for Jenny. First I want to say I also support
22 this.

1 Jenny, I understand, though I don't
2 agree with the philosophic idea of the removing
3 two regulations for every new regulation that you
4 might add, but this is -- the NOSB and NOP are in
5 a unique situation in that these regulations
6 don't apply to everyone. They just apply to the
7 people who want to play this game, so to speak,
8 the organic game. And the other thing is this is
9 a regulations-based process.

10 So what I wondering is whether the
11 leadership within the USDA can -- sees this sort
12 of structurally different, because it really does
13 approach regulation from an entirely different
14 standpoint from then regulations that apply to an
15 entire industry say.

16 DR. TUCKER: So a couple of comments
17 on this. So there are -- especially within the
18 agricultural marketing service there are actually
19 a lot of different sectors that want to be
20 regulated. So the organic folks aren't the only
21 folks who want to be regulated. And so I think
22 that -- it is -- while it is certainly special

1 about organic, there are a lot of special sectors
2 that would actually really like regulation. And
3 so I think that is a consistent tension.

4 I think, yes, things to keep in mind
5 that will come up with respect to origin of
6 livestock, so putting it out on the table is that
7 the regulations need to be linked directly with
8 the act, the Organic Foods Production Act. And
9 so the administration will take a careful look at
10 what OFPA actually says about origin of livestock
11 and that may also weigh into its willingness to
12 pursue regulations around this that this
13 administration is very focused on reading what
14 the act actually says, so what Congress has
15 actually authorized. I think you've seen that in
16 rulemaking that has occurred over the last period
17 of time. And so that is something that needs to
18 be taken into account is what OFPA actually says
19 about origin of livestock. So that is a bit of a
20 challenge here.

21 So I think that the administration,
22 third, has also made it clear; Mr. Ibach made

1 this sort of clear the last time he visited this
2 group is that there -- the primary focus and
3 prioritization is enforcing the standards we have
4 and not moving the goal post. That's a metaphor
5 that the Undersecretary used the last time he was
6 here. So I think those are all variables that
7 will play into the administration's consideration
8 of this item.

9 quality

10 MEMBER SWAFFAR: Emily?

11 MEMBER OAKLEY: I just want to ask a
12 question and reiterate that stakeholders can
13 definitely help us in this endeavor because the
14 NOSB has essentially done what we can do. So as
15 we discussed previously throughout this meeting,
16 if people who care deeply about this issue can
17 write about it and encourage farmers to write
18 about it -- in other work that I do I know
19 letters really do matter and a letter to the
20 Secretary of the Agriculture is not
21 insignificant. And five letters from producers
22 is a lot of letters to the Secretary, but not

1 necessarily a hard ask for stakeholders to
2 achieve. So just want to put that out there.

3 And when you mentioned January as the
4 time frame, I wondering would that be a strategic
5 time to submit letters or is any time
6 appropriate?

7 DR. TUCKER: Any time is appropriate
8 to submit letters. January will be the time
9 where we will be actively briefing this issue.

10 MEMBER SWAFFAR: I'm going to call on
11 myself, which Emily just hit on everything I was
12 going to say, but reiterate those groups:
13 industry trade organizations, dairy trade
14 organizations, please get meetings with the
15 Secretary. We are doing what we can. Obviously
16 resolutions from us aren't huge steps in the
17 world, but we want to help you as best we can.
18 And so wholeheartedly support this.

19 Very quickly, Harriet.

20 VICE CHAIR BEHAR: I also encourage
21 certifiers that may have lost operations to also
22 write and say -- so if there's certifier shopping

1 going on due to inconsistent implementation.

2 MEMBER MORTENSEN: Quickly.

3 MEMBER SWAFFAR: Really quick.

4 MEMBER MORTENSEN: Quickly on the
5 letter writing, when we heard from the farmers
6 about grain problem integrity in La Crosse,
7 Wisconsin last winter, I was watching the
8 reaction of the politicians in room and it was
9 clear that the most moving information were case
10 studies where their own operation was affected in
11 what way -- what was the economic hit on their
12 operation so that people could actually see what
13 -- how this translates on the ground.

14 MEMBER SWAFFAR: Okay, guys. I think
15 we'll cut discussion off. So we have a motion
16 and a second on the floor.

17 CHAIRMAN CHAPMAN: Could you remind me
18 on who made the motion and the second?

19 MEMBER SWAFFAR: I made the motion;
20 Harriet seconded that motion.

21 CHAIRMAN CHAPMAN: Thank you.

22 So we have a motion and a second to

1 adopt this resolution. I am just going to read
2 the resolved portion of it. "Therefore, be it
3 resolved by unanimous vote," if that occurs, "the
4 National Organic Standards Board as the USDA's
5 Federal Advisory Board on Organic Issues and
6 representing organic farmers, ranchers,
7 processors, retailers and consumers urges the
8 Secretary to directly issue a final rule for the
9 origin of livestock that incorporates public
10 comments submitted in response to the proposed
11 rule, Docket No. AMS-NOP-11-0009."

12 A yes vote is to adopt this
13 resolution; a no vote is to reject it. The
14 voting will start with Jesse.

15 MEMBER BUIE: Yes.

16 MEMBER SWAFFAR: Yes.

17 SECRETARY RICE: Yes.

18 VICE CHAIR BEHAR: Yes.

19 MEMBER SEITZ: Yes.

20 MEMBER MORTENSEN: Yes.

21 MEMBER ELA: Yes.

22 MEMBER BRADMAN: Yes.

1 MEMBER GREENWOOD: Yes.

2 MEMBER DE LIMA: Yes.

3 MEMBER SCHWARTZ: Yes.

4 MEMBER ROMERO-BRIONES: Yes.

5 MEMBER OAKLEY: Yes.

6 MEMBER BAIRD: Yes.

7 CHAIRMAN CHAPMAN: Chair votes yes.

8 SECRETARY RICE: That's 15 yes; 0 no.

9 CHAIRMAN CHAPMAN: The motion passes.

10 Ashley?

11 MEMBER SWAFFAR: That concludes

12 everything that the Livestock Committee has. We

13 were hoping to be done a little quicker

14 yesterday, but Scott and his beard kept talking.

15 (Laughter.)

16 CHAIRMAN CHAPMAN: That beard always

17 gets in the way.

18 Okay. We're going to move onto the

19 Handling Subcommittee. It's about 10:00. We'll

20 start with the sunsets, I think, Lisa, and then

21 at some point -- maybe we can get through the

22 sunsets. If not, we'll take a break at some

1 point in there.

2 So at this time handing it over to
3 Lisa, Chair of the Handling Committee.

4 MEMBER DE LIMA: All right. We're
5 going to start off with sunsets. First up
6 calcium carbonate.

7 Clarissa?

8 DR. MATHEWS: At Section 205.605, Non-
9 Agricultural, Non-Organic Substances Allowed as
10 Ingredients in or on Processed Products Labeled
11 as Organic or Made with Organic-Specified
12 Ingredients or Food Groups. Paragraph (a), Non-
13 Synthetics Allowed. The listing is calcium
14 carbonate.

15 MEMBER DE LIMA: Scott?

16 SECRETARY RICE: Thank you. Calcium
17 carbonate is widely used as a dietary supplement,
18 an antacid, dough conditioner, acidity regulator
19 in wines, a stabilizer, anti-caking agent,
20 gelling agent. There's quite a number of uses.

21 And it is widely supported in public
22 comments. And I wanted to highlight we had two

1 comments from certifiers expressing concern
2 regarding the TR's reference to the purified
3 version of this, which is precipitated calcium
4 carbonate, or PCC. The TR referenced that as
5 synthetic.

6 As we heard during the discussion in
7 public comments that reference does not align
8 with the use of NOP guidance 5033-1, the decision
9 tree for classification of materials as synthetic
10 or non-synthetic, which finds PCC to be a non-
11 synthetic substance.

12 The TR, as we also heard, serves as
13 just one aid to the Subcommittee in its review of
14 a material and should not be looked to as the
15 definitive voice when making a determination a
16 material status as synthetic or non-synthetic.
17 And again, just reiterating widespread support of
18 this across the community. Thank you.

19 MEMBER DE LIMA: Any discussion?

20 Tom?

21 CHAIRMAN CHAPMAN: Yes, I just want to
22 echo Scott's comments there, and I think we can

1 even potentially clarify that on the cover sheet
2 for this item. Oftentimes we get comments in the
3 technical reviews or submissions by those
4 reviewers that still don't align with the
5 findings that are made by the NOSB, and so the
6 NOSB findings should definitely take precedence
7 on that and not -- and the TR is just not -- it's
8 a source of information just like public comment.

9 MEMBER DE LIMA: All right. I guess
10 we're ready for a vote. Tom?

11 CHAIRMAN CHAPMAN: All right. This is
12 a seconded motion from the Subcommittee. It's a
13 motion to remove calcium carbonate from the
14 National List. The motion was made by Lisa and
15 seconded by Scott. And the voting will start
16 with Ashley. A yes vote is to remove; a no vote
17 is to remain.

18 MEMBER SWAFFAR: No.

19 SECRETARY RICE: No.

20 VICE CHAIR BEHAR: No.

21 MEMBER SEITZ: No.

22 MEMBER MORTENSEN: No.

1 MEMBER ELA: No.

2 MEMBER BRADMAN: No.

3 MEMBER GREENWOOD: No.

4 MEMBER DE LIMA: No.

5 MEMBER SCHWARTZ: No.

6 MEMBER ROMERO-BRIONES: No.

7 MEMBER OAKLEY: No.

8 MEMBER BAIRD: No.

9 MEMBER BUIE: No.

10 CHAIRMAN CHAPMAN: Chair votes no.

11 SECRETARY RICE: That's 0 yes; 15 no;

12 0 absent.

13 CHAIRMAN CHAPMAN: The motion fails.

14 Lisa?

15 MEMBER DE LIMA: Next up is flavors.

16 DR. MATHEWS: At Section 205.605(a)

17 the listing is flavors, non-synthetic sources

18 only and must not be produced using synthetic

19 solvents in carrier systems or any artificial

20 preservative.

21 MEMBER DE LIMA: Tom?

22 CHAIRMAN CHAPMAN: Natural flavors are

1 compound substances derived from natural sources
2 including plants, herbs, spices, botanicals and
3 other substances. They're typically used in
4 small amounts in food products. Some were from a
5 0.05 to 0.4 percent of ingredients typically.
6 And they're used in products that generally
7 contain less than the optimal amount of flavor
8 necessary to give finished products their desired
9 flavor profile. Widely used throughout the
10 industry and there are virtually all applications
11 of any sort of processed products including baked
12 goods, dairy products, jams, jellies, snack
13 foods, juice products, dry-pack good products,
14 cereals, anything that's not fresh. Natural
15 flavors are often proprietary formulations
16 developed specifically for intended purposes and
17 functionalities as well as to withstand the
18 manufacturing process of which they're subjected
19 to.

20 We received a large amount of support
21 for flavors from trade associations, industry and
22 interest groups, many speaking to their

1 criticality in product formulations. Certifiers
2 reported about hundreds of their operations that
3 utilize these materials. Several commenters also
4 supported the 2015 NOSB recommendation to add
5 commercial availability to this listing. I
6 should note that this recommendation was part of
7 a proposed rule that was published earlier this
8 year and that we heard earlier from Dr. Paul
9 Lewis was still in the process and being actively
10 being worked by the program.

11 A few commenters objected to the
12 categorical listing of flavors and rather than
13 individual -- that this item be removed and
14 individual flavors be specifically listed in
15 their place.

16 Other commenters had concerns around
17 the use of excluded methods in flavoring
18 constituents, however, it should be noted that
19 the big three exclusions do apply to natural
20 flavors. This was even reiterated in the written
21 comments by FEMA, who is recognized by the FDA to
22 establish the GRAS status of flavoring

1 constituents.

2 MEMBER DE LIMA: Any discussion?

3 Emily?

4 MEMBER OAKLEY: Just want to reiterate
5 support for the 2015 annotation and hope that
6 proceeds quickly.

7 MEMBER DE LIMA: Harriet?

8 VICE CHAIR BEHAR: Flavors are another
9 area where fermentation occurs in the manufacture
10 of some of these non-synthetic flavors. And so
11 if the Handling Subcommittee was thinking -- I
12 know that that was brought up by the public -- by
13 numerous public commenter about a review of
14 fermentation process.

15 MEMBER DE LIMA: Any other discussion?

16 (No audible response.)

17 MEMBER DE LIMA: All right. Tom?

18 CHAIRMAN CHAPMAN: Okay. This is a
19 seconded motion from the Subcommittee. The
20 motion was made by Tom Chapman and seconded by
21 Scott Rice. The motion is to remove flavors from
22 the National List. A yes vote is to retain; a no

1 is to remove and the voting will start with -- a
2 yes vote is to remove; a no vote is to retain,
3 and the voting will start with Scott.

4 SECRETARY RICE: No.

5 VICE CHAIR BEHAR: No.

6 MEMBER SEITZ: No.

7 MEMBER MORTENSEN: No.

8 MEMBER ELA: No.

9 MEMBER BRADMAN: No.

10 MEMBER GREENWOOD: No.

11 MEMBER DE LIMA: No.

12 MEMBER SCHWARTZ: No.

13 MEMBER ROMERO-BRIONES: No.

14 MEMBER OAKLEY: No.

15 MEMBER BAIRD: No.

16 MEMBER BUIE: No.

17 MEMBER SWAFFAR: No.

18 CHAIRMAN CHAPMAN: Chair votes no.

19 SECRETARY RICE: That's 0 yes; 15 no;

20 0 absent.

21 CHAIRMAN CHAPMAN: Motion fails.

22 Lisa?

1 MEMBER DE LIMA: Next up is gellan
2 gum.

3 DR. MATHEWS: At Section 205.605(a)
4 the listing is gellan gum, CAS No. 71010-52-1,
5 high acyl form only.

6 MEMBER DE LIMA: Gellan gum is useful
7 as a thickening and gelling agent in food
8 production. Uses include bakery fillings,
9 confections, dairy products, personal care items.
10 Typically use of gellan gum is at less than 0.5
11 percent of a finished product. And some of the
12 unique properties of gellan gum are that it has a
13 high viscosity at low concentrations and forms a
14 thermal reversible gel.

15 So public comments. There were a
16 number of manufacturers who wrote in in support
17 of the material with multiple of them stating
18 that they're using gellan gum as a carrageenan
19 replacement due to customer concerns. Also one
20 that said they were using it as a vegetarian
21 option instead of gelatin. A couple different
22 public commenters requested that the CBI from the

1 original petition be disclosed and requested that
2 the material be delisted until that happens.

3 There were also requests to take
4 measures to ensure that handlers are verifying
5 that the gums are produced without excluded
6 methods. And one retailer that commented on
7 reports from consumers of negative reactions and
8 generally consumers wanting to avoid carrageenan
9 and other stabilizers and emulsifiers.

10 Discussion? Emily?

11 MEMBER OAKLEY: I just had a question
12 about the abstention. Was that a new member who
13 didn't have information or was there concern
14 among Subcommittee members?

15 MEMBER DE LIMA: Who abstained? I
16 don't know. Oh, it was a new member that just
17 didn't -- wasn't up to speed yet.

18 Ashley?

19 MEMBER SWAFFAR: So this one --
20 obviously you could tell through public comment
21 that it got me going a little bit because I was a
22 member that voted to remove carrageenan. And the

1 dairy industry worked very hard to find a
2 replacement for carrageenan and listening to
3 their customers. And gellan gum is that
4 replacement.

5 And I said when I voted to remove I'm
6 concerned that next people will go after these
7 gums. And here's the new sunset process, and we
8 are seeing people say they don't want these gums
9 relisted. And I think that is a real disservice
10 to that industry because they tried to remove an
11 item that many consumers had an issue with and a
12 lot of consumers don't have as much of as a
13 reaction to this item.

14 So I really want to say that we should
15 protect this material because the dairy industry
16 reformulated, and it takes a long time to do that
17 and change labels and do all that. So I really
18 support this item for relisting.

19 MEMBER DE LIMA: Dave?

20 MEMBER MORTENSEN: Yes, I have a
21 concern about some of the comments that I read
22 and things that I read in the report about the

1 fermentation process and what we know about
2 what's being fermented.

3 And so when I was reading through
4 these that was a recurring concern of mine, where
5 the content of the process that gives rise to the
6 gum is clear, Lisa, just so that you understand
7 my logic, I was very comfortable with it, but in
8 this case and in one or two other cases that --
9 at least as far as I can tell, that's not clear.
10 Is it arising from GMO sources, for example?
11 There's one of these where sugar beets is the
12 source. Well, no, sorry. That's another
13 subject.

14 Yes. So anyway, if anyone on the
15 Committee could speak to that or what your
16 thoughts are about that potential conflict of us
17 not really wanting to be doing things with GMO
18 crops, and on the other hand not being consistent
19 throughout our food system.

20 MEMBER DE LIMA: Tom?

21 CHAIRMAN CHAPMAN: I mean, I guess I
22 have a question back to you on that one, Dave,

1 around why this product as a product of
2 fermentation rises above other products. We just
3 voted on ethanol alcohol used in crop production
4 and ethanol could come -- is a product of
5 fermentation at some point, which also could have
6 source materials from any sorts of original
7 product. And so that concern applies to
8 potentially every material that could be a
9 product of fermentation on this list. What I can
10 say is --

11 MEMBER MORTENSEN: Maybe to that
12 point, just so that we get this out on the table,
13 we don't eat the alcohol. So we're eating this
14 thing and the drink that we're drinking. And so
15 knowing what's in the ingredient I think is
16 important when we consume it as opposed to when
17 we use it to wash tables or some other process.

18 CHAIRMAN CHAPMAN: So that concern is
19 going to still extend to every single product of
20 fermentation that's on the National List, even on
21 the handling side. And so just to make sure that
22 you're going to raise that objection everywhere,

1 and we have dozens of those materials that are on
2 the list. Generally the exclusion has been
3 applied to the excluded methods. It's still
4 applied to these substances and the -- and is
5 generally applied to the microorganisms used to
6 actually convert whatever carbohydrate substance
7 is being turned into the finished good product
8 that is then put in as a food ingredient. And I
9 don't know, I guess I'll look to the certifier to
10 tell me if I'm correct or incorrect in that
11 interpretation.

12 SECRETARY RICE: That -- yes.

13 (Laughter.)

14 MEMBER MORTENSEN: Well, just -- I
15 mean, so anyway, just to -- so that folks know
16 when we vote on things, that's one of the
17 criteria that's in my mind. The other criteria
18 that's in my mind is that it's important to know
19 the source of whatever it is that we're
20 fermenting. I am not personally convinced that
21 we have a pure system so that when we ferment
22 something, we know for example that every

1 characteristic of wheat that someone might be
2 allergic to is no longer in the resulting
3 fermented product. And so that's a concern of
4 mine.

5 MEMBER DE LIMA: Harriet and then Tom?

6 VICE CHAIR BEHAR: So this -- I
7 understand that there are some issues in
8 consumers, on retailers. Steve is stating why
9 can't people just shake things if they want to
10 keep them in suspension and why do we need these
11 gums, but as we've seen with carrageenan the
12 marketplace has done the work. This would be on
13 the label. If consumers choose not to buy it,
14 the manufacturers of the materials, of the
15 finished product will take note that their sales
16 are dropping and decide to change.

17 But the reality of the marketplace is
18 that -- at this time is that things move around.
19 And they are in storage. And they're sitting on
20 trucks and they're -- that basically you don't
21 want your chocolate milk with all the chocolate
22 in the bottom and that sort of thing.

1 So I will be voting for this material
2 and I see it very much as more benign than the
3 carrageenan and allow the processors to put it
4 out there and see what the market says.

5 MEMBER DE LIMA: Tom and then Sue?

6 CHAIRMAN CHAPMAN: Yes, I just want to
7 point out that allergens are strictly regulated
8 in the U.S. under the Food Allergen Labeling
9 Consumer Protection Act of 2004 under the
10 authority of the FDA, and if folks do have
11 concerns around allergen, that would probably be
12 the appropriate location to lodge those concerns.

13 MEMBER DE LIMA: Sue?

14 MEMBER BAIRD: I know a majority, and
15 I would say all certifiers send out if it's a
16 non-agricultural, non-organic substance they send
17 out a manufacturer's affidavit that the
18 manufacturer has to state that the non-organic,
19 non-agricultural substance is not produced with
20 genetic-modified organisms, genetic engineering
21 and/or using solvents that are not allowed.

22 So I think unless we've got blatant

1 liars, you can put your mind to rest that there's
2 no GMS in the fermented products.

3 MEMBER DE LIMA: Ashley?

4 MEMBER SWAFFAR: And I just want to
5 point out that question was asked of a commenter
6 yesterday or the day before, a predominant
7 manufacturer of the gellan gum, and they
8 confirmed they did not use GMOs. So just want to
9 remind folks of that comment.

10 MEMBER DE LIMA: All right. Tom?

11 CHAIRMAN CHAPMAN: Okay. We have a
12 motion to remove gellan gum from the National
13 List. The motion was made by Lisa and seconded
14 by Steve. A yes vote is to remove; a no vote is
15 to retain, and the voting will start with
16 Harriet.

17 VICE CHAIR BEHAR: No.

18 MEMBER SEITZ: No.

19 MEMBER MORTENSEN: Yes.

20 MEMBER ELA: No.

21 MEMBER BRADMAN: No.

22 MEMBER GREENWOOD: No.

1 MEMBER DE LIMA: No.

2 MEMBER SCHWARTZ: No.

3 MEMBER ROMERO-BRIONES: No.

4 MEMBER OAKLEY: No.

5 MEMBER BAIRD: No.

6 MEMBER BUIE: No.

7 MEMBER SWAFFAR: No.

8 SECRETARY RICE: No.

9 CHAIRMAN CHAPMAN: Chair votes no.

10 SECRETARY RICE: That's 1 yes; 14 no,

11 0 absent.

12 CHAIRMAN CHAPMAN: Motion fails.

13 Lisa?

14 MEMBER DE LIMA: Next up is oxygen.

15 Clarissa?

16 DR. MATHEWS: At Section 205.605(a)

17 the listing is oxygen, oil-free grades.

18 MEMBER DE LIMA: So according to

19 public comment oxygen is used by wineries,

20 breweries and manufacturers of carbonated

21 beverages. Certifiers reported that it's listed

22 on 17 OSPs. One winery commented that they use

1 it for micro-oxygenation, a process where oxygen
2 is added into red wine at a controlled rate and
3 flow to stabilize color, improve astringencies
4 and aromatic components of the final wine.

5 Any discussion about this
6 controversial material?

7 Harriet?

8 VICE CHAIR BEHAR: I consider oxygen
9 essential.

10 (Laughter.)

11 MEMBER DE LIMA: Ashley?

12 MEMBER SWAFFAR: In previous meetings
13 there was the discussion of that. One board
14 member may or may not have considered it
15 essential in the past, so thanks for clarifying
16 that, Harriet.

17 MEMBER DE LIMA: No, and I would say
18 it was great to have folks writing in public
19 comment because this is one of those materials
20 we've done; when was that, in Stowe two or three
21 years ago, and looking at it again as part of the
22 reorganization. And that first time around I

1 think people just thought, oh, well, it's oxygen.
2 We don't need to write in and give any support.
3 And it was good to see this time around specific
4 uses and how producers are using it. It's
5 helpful for us and for that to be on the record.

6 All right. Tom?

7 CHAIRMAN CHAPMAN: Yes, and I think
8 Scott's beard is taking up all the oxygen in this
9 room.

10 (Laughter.)

11 SECRETARY RICE: Second.

12 (Laughter.)

13 CHAIRMAN CHAPMAN: All right. We have
14 a motion to remove oxygen from 205.605. The
15 motion was made by Lisa and seconded and Scott.
16 A yes vote is to remove; a no vote is to retain,
17 and the voting will start with Dan.

18 MEMBER SEITZ: No.

19 MEMBER MORTENSEN: Yes.

20 MEMBER ELA: No.

21 MEMBER BRADMAN: No.

22 MEMBER GREENWOOD: No.

1 MEMBER DE LIMA: No.

2 MEMBER SCHWARTZ: No.

3 MEMBER ROMERO-BRIONES: No.

4 MEMBER OAKLEY: No.

5 MEMBER BAIRD: No.

6 MEMBER BUIE: No.

7 MEMBER SWAFFAR: No.

8 SECRETARY RICE: No.

9 VICE CHAIR BEHAR: No.

10 CHAIRMAN CHAPMAN: Chair votes no.

11 SECRETARY RICE: That's 0 yes; 15 no;

12 0 absent.

13 CHAIRMAN CHAPMAN: Motion fails.

14 Lisa?

15 MEMBER DE LIMA: Next up potassium

16 chloride.

17 DR. MATHEWS: At Section 205.605(a)

18 the listing is potassium chloride.

19 MEMBER DE LIMA: A-dae?

20 MEMBER ROMERO-BRIONES: So affirmed

21 uses of potassium chloride are in foods as a

22 flavor enhancer, flavoring agent, nutrient

1 supplement, pH control agent and a stabilizer or
2 thickener. It is also a salt substitute.

3 Public comment was overwhelmingly in
4 favor of relisting. Some commenters commented
5 that it is used in infant and toddler formula and
6 snacks. One commenter listed it as assisting in
7 gelling of pectin as a sodium replacer and it's
8 also used to stabilize yogurts.

9 MEMBER DE LIMA: Discussion from the
10 Board?

11 (No audible response.)

12 MEMBER DE LIMA: All right. Tom?

13 CHAIRMAN CHAPMAN: Okay. The motion
14 is to remove potassium chloride from the National
15 List. The motion was made by A-dae and seconded
16 by Steve. A yes vote is to relist; a no vote is
17 to -- a yes vote is to remove; a no vote is to
18 relist, and the voting will start with Dave.

19 MEMBER MORTENSEN: No.

20 MEMBER ELA: No.

21 MEMBER BRADMAN: No.

22 MEMBER GREENWOOD: No.

1 MEMBER DE LIMA: No.
2 MEMBER SCHWARTZ: No.
3 MEMBER ROMERO-BRIONES: No.
4 MEMBER OAKLEY: No.
5 MEMBER BAIRD: No.
6 MEMBER BUIE: No.
7 MEMBER SWAFFAR: No.
8 SECRETARY RICE: No.
9 VICE CHAIR BEHAR: No.
10 MEMBER SEITZ: No.
11 CHAIRMAN CHAPMAN: Chair votes no.
12 SECRETARY RICE: That's 0 yes; 15 no;
13 0 absent.
14 CHAIRMAN CHAPMAN: Motion fails.
15 MEMBER DE LIMA: Next up is alginates.
16 DR. MATHEWS: At Section 205.605,
17 paragraph (b), Synthetics Allowed. The listing
18 is alginates.
19 MEMBER DE LIMA: Steve?
20 MEMBER ELA: Public comments received
21 on this material for this meeting were
22 essentially similar to the comments received in

1 the spring. Alginates are generally regarded as
2 grass. They're used as thickening and gelling
3 agents similar to some of the gums but with some
4 significantly different properties.

5 Basically manufacturers in the
6 comments on this ranked them around an 8 out of
7 10 on essentiality saying they're critical to the
8 formulations of some of their products. And
9 really the main objections to alginates comes
10 back to the marine materials issue of sustainable
11 harvesting of seaweeds or macroalgae; as I'm
12 learning that describe them now, and listing of
13 specific species that are used in the
14 manufacturer of them.

15 MEMBER DE LIMA: Any discussion?

16 Emily?

17 MEMBER OAKLEY: This is really a
18 question about the feasibility of listing
19 specific alginates, and I don't know how this --
20 I didn't do research to determine how this group
21 has originally categorized and added to the list,
22 but just in response to those public comments is

1 there any feasibility of that? Because I know
2 this was part of the original discussion document
3 and review in handling from the 2016 TR. Does
4 anybody have more information about that?

5 MEMBER ELA: I'm certainly not
6 qualified to answer that. In public comments and
7 things it was really just that general we should
8 list them, but there really wasn't any further
9 detail of how we would go about that.

10 MEMBER DE LIMA: Tom?

11 CHAIRMAN CHAPMAN: Did you see any
12 specific alginates that were objected to in the
13 public comments?

14 MEMBER OAKLEY: No, and that's why I'm
15 asking this question. I guess I would just put
16 it back out there to stakeholders if there are
17 any specific examples or criteria for ways that
18 we might be able to do that. I think we would
19 need that first before we could explore that
20 issue in any more detail, and it would be helpful
21 to get that from the stakeholder community if
22 they have that information.

1 MEMBER DE LIMA: Harriet?

2 VICE CHAIR BEHAR: Yes, I did see that
3 public commenters wanted a breakdown, and perhaps
4 we can work on that somewhat in the marine
5 materials. And the other issue public comments
6 had was about the environmental impact. The
7 other side of it is that it is a very healthful
8 food for humans and that it has all of these
9 extra processing functionalities. So I see it as
10 an important product and/or material on the
11 National List. And we are dealing with some of
12 the issues that the public has brought forward.

13 MEMBER DE LIMA: Tom? Oh, Dave?

14 MEMBER MORTENSEN: Yes, I had some of
15 the same questions about -- it seems like we're
16 going into more detail for harvesting maybe algae
17 for fertilizer, which I'm guessing is a larger
18 quantity than the amount that we would be using
19 in alginates. So the question to Emily is us
20 acting on this now without having our more fully-
21 scoped thing that we voted on yesterday in place
22 sensible or --

1 MEMBER DE LIMA: Okay. Emily?

2 MEMBER OAKLEY: Yes. No, I mean, I
3 don't think we -- that's what I was trying to say
4 is I think this is something we should explore.
5 And this is -- the topic of marine materials is
6 now in the now in the Materials Subcommittee, so
7 that allows for cross-pollination of these
8 topics. And I think as Harriet just illustrated
9 we will take this up in Materials. And just
10 putting it out there to stakeholders, if you want
11 to use the open docket to help us figure out to
12 address this, that would be very helpful.

13 MEMBER DE LIMA: Tom?

14 CHAIRMAN CHAPMAN: All right. We have
15 a motion to remove alginates, a seconded motion
16 from the Subcommittee. The motion was made by
17 Steve and seconded by Lisa. A yes vote is to
18 remove; a no vote to relist and the voting will
19 start with Steve.

20 MEMBER ELA: No.

21 MEMBER BRADMAN: No.

22 MEMBER GREENWOOD: No.

1 MEMBER DE LIMA: No.
2 MEMBER SCHWARTZ: No.
3 MEMBER ROMERO-BRIONES: No.
4 MEMBER OAKLEY: No.
5 MEMBER BAIRD: No.
6 MEMBER BUIE: No.
7 MEMBER SWAFFAR: No.
8 SECRETARY RICE: No.
9 VICE CHAIR BEHAR: No.
10 MEMBER SEITZ: No.
11 MEMBER MORTENSEN: No.
12 CHAIRMAN CHAPMAN: Chair notes no.
13 SECRETARY RICE: That's 0 yes; 15 no;
14 0 absent.
15 CHAIRMAN CHAPMAN: Motion fails.
16 Lisa?
17 MEMBER DE LIMA: Next up, calcium
18 hydroxide.
19 DR. MATHEWS: At Section 205.605(b)
20 the listing is calcium hydroxide.
21 MEMBER DE LIMA: A-dae?
22 MEMBER ROMERO-BRIONES: Calcium

1 hydroxide is used as a component of aluminum-free
2 baking powder, to clarify sugar from molasses and
3 as a condition for corn tortillas. It's used as
4 a pH buffer. It's also used to fortify foods
5 with calcium, clarify sugarcane or beet juice,
6 for making hominy and masa as a firming agent.

7 Comments. The few comments suggested
8 relisting. One commenter mentioned that it has
9 been used for centuries to dissolve the outer
10 coating of corn so that it's like a thick -- like
11 it can stick together. And another comment said
12 that we should clarify whether that's an
13 acceptable use.

14 MEMBER DE LIMA: Any discussion?

15 Harriet?

16 VICE CHAIR BEHAR: In the written
17 proposal there's discussion about whether or not
18 it's allowed as a firming agent. Did we ever
19 receive any comment from the program, because
20 obviously there's a manufacturer that wants to
21 know.

22 DR. MATHEWS: Regarding the uses of

1 firming agent?

2 VICE CHAIR BEHAR: Using calcium
3 hydroxide as a firming agent. I would think that
4 since it's not annotated that it would be
5 allowed, but there was a commenter who wanted to
6 know. So maybe on the public record we could
7 help them out.

8 DR. MATHEWS: I think we probably need
9 to take that back for consideration.

10 CHAIRMAN CHAPMAN: Or that's something
11 they can address to their certifier.

12 MEMBER DE LIMA: Harriet?

13 VICE CHAIR BEHAR: Just to point out
14 that hydrated lime is on all three lists: Crops,
15 Livestock and Handling.

16 MEMBER DE LIMA: All right. Tom?

17 CHAIRMAN CHAPMAN: And just to point
18 out it's listed differently on all three lists.

19 (Laughter.)

20 CHAIRMAN CHAPMAN: Hydrated lime;
21 Lime, hydrated; calcium hydroxide.

22 Okay. We have a motion to remove

1 calcium hydroxide from the National List. The
2 motion was made by A-dae and seconded by Lisa. A
3 yes vote is to remove; a no vote is to retain,
4 and the voting will start with Asa.

5 MEMBER BRADMAN: No.

6 MEMBER GREENWOOD: No.

7 MEMBER DE LIMA: No.

8 MEMBER SCHWARTZ: No.

9 MEMBER ROMERO-BRIONES: No.

10 MEMBER OAKLEY: No.

11 MEMBER BAIRD: No.

12 MEMBER BUIE: No.

13 MEMBER SWAFFAR: No.

14 SECRETARY RICE: No.

15 VICE CHAIR BEHAR: No.

16 MEMBER SEITZ: No.

17 MEMBER MORTENSEN: No.

18 MEMBER ELA: No.

19 CHAIRMAN CHAPMAN: Chair votes no.

20 SECRETARY RICE: That's 0 yes; 15 no;

21 0 absent.

22 CHAIRMAN CHAPMAN: Motion fails.

1 Lisa?

2 MEMBER DE LIMA: Next up is ethylene.

3 DR. MATHEWS: At Section 205.605(b)
4 the listing is ethylene, allowed for post-harvest
5 ripening of tropical fruit and degreening of
6 citrus.

7 MEMBER DE LIMA: Asa?

8 MEMBER BRADMAN: Thank you. So
9 ethylene -- we've had a number of discussions
10 about this. Ethylene is a commonly-used
11 material, a hormone essentially, growth regulator
12 and it facilitates ripening in stored products.
13 We've heard a lot about bananas. Also citrus
14 fruit. Often the citrus fruit matures internally
15 earlier than the outer color and so ethylene is
16 used for greening, to bring the rind to an orange
17 color, which is better for sales.

18 There's a lot of support for ethylene
19 across the board, both in terms of -- for
20 tropical fruits, but also for citrus. I think
21 one of the key comments that had an impact on me
22 was the notion that it would -- you would -- we

1 would reduce the season for citrus if it wasn't
2 available for organic citrus because it -- color
3 is some important for sales during periods and we
4 would -- there would be a loss of market. So I
5 think there's a lot of support about this.

6 There's been some concerns about the
7 use of this as a growth regulator. That's not
8 specifically necessary for production and
9 processing. On a personal basis I think this is
10 one of those materials where allowing it allows a
11 broader market for organically produced
12 materials. It helps enhance and grow the share
13 of organic.

14 Any discussion?

15 MEMBER DE LIMA: Harriet?

16 VICE CHAIR BEHAR: In review of
17 distribution houses and produce handlers it
18 appears that the infrastructure for handling this
19 material is well maintained and there is really
20 very little damage to human health or the
21 environment.

22 MEMBER DE LIMA: Steve?

1 MEMBER ELA: Well, and I'll just
2 iterate that in the apple industry we actively
3 remove ethylene from our storage houses, so it's
4 ironic to be adding it. But it is -- I mean, it
5 is a naturally -- I mean, even though this is a
6 synthetic, it's naturally occurring in many
7 fruits and so I don't see any big problem with
8 this.

9 MEMBER DE LIMA: Dave?

10 MEMBER MORTENSEN: And I support this.
11 I'll preface my statements by saying that, but I
12 also -- as we go along the concern about the use
13 of growth regulators continues to be something
14 that's very much on my mind when we look at
15 things like this and the decision that we made
16 not to allow the compound for suppressing
17 suckering in tobacco.

18 In some ways to me that was a similar
19 decision. We were thinking about growth
20 regulators and how it affects the synchrony of
21 plant development in the field. I thought the
22 benefits that were laid about by the Costa Rican

1 farmers about the pest management benefits of
2 synchrony of fruiting of pineapple was
3 compelling.

4 On the other hand it was also a large
5 monoculture cropping practice that has its own
6 set of pest problems. But all and all on the
7 balance I think this -- the strengths of this
8 outweigh some of these concerns.

9 MEMBER DE LIMA: Tom?

10 CHAIRMAN CHAPMAN: So this is for
11 ethylene use in processing. We'll talk about it
12 again and it's crop applications.

13 I do want to say as one of the people
14 who voted down the free fatty acids ethylene
15 usage both here and on the Crop listing is quite
16 constrained to a specific application. And on
17 that free fatty acid petition when we voted it
18 down, it was not constrained to a specific
19 application for a need in a specific crop.

20 MEMBER DE LIMA: All right. Tom?

21 CHAIRMAN CHAPMAN: Motion is to remove
22 ethylene from the National List. And I should I

1 guess specify on this one; I probably should have
2 specified on the other one, because calcium
3 hydroxide is in multiple spots, that it's for
4 205-605(b) of the National List. The motion is
5 made by Asa and seconded by Tom. A yes vote is
6 to remove; a no vote is to retain, and the voting
7 will start with Rick.

8 MEMBER GREENWOOD: No.

9 MEMBER DE LIMA: No.

10 MEMBER SCHWARTZ: No.

11 MEMBER ROMERO-BRIONES: No.

12 MEMBER OAKLEY: No.

13 MEMBER BAIRD: No.

14 MEMBER BUIE: No.

15 MEMBER SWAFFAR: No.

16 SECRETARY RICE: No.

17 VICE CHAIR BEHAR: No.

18 MEMBER SEITZ: No.

19 MEMBER MORTENSEN: No.

20 MEMBER ELA: No.

21 MEMBER BRADMAN: No.

22 CHAIRMAN CHAPMAN: Chair votes no.

1 SECRETARY RICE: That's 0 yes; 15 no;
2 0 absent.

3 CHAIRMAN CHAPMAN: Motion fails.

4 Lisa?

5 MEMBER DE LIMA: Next is glycerides,
6 mono and di.

7 DR. MATHEWS: At Section 205.605(b)
8 the listing is glycerides, mono and di for use
9 only in drum drying of food.

10 MEMBER DE LIMA: So glycerides, mono
11 and di in drum drying. They act as an emulsifier
12 and release agent. When mixed with food they
13 help prevent sticking during processing and help
14 to strip food from the cylinder walls once dried.

15 As far as public comment there was
16 support from two manufacturers. There was also a
17 certifier and an organization that supported
18 removal because of possible non-synthetic and
19 organic alternatives that were suggested in the
20 TR.

21 It was also pointed out by an
22 organization that in the 2015 review one

1 commenter stated that mono and diglycerides are
2 important emulsifiers used in organic products to
3 ensure there's no fat separation and the
4 organization would like certifiers to be alerted
5 to this possible misuse.

6 Any discussion from the Board?

7 (No audible response.)

8 MEMBER DE LIMA: Tom?

9 CHAIRMAN CHAPMAN: Motion is to remove
10 mono and diglycerides from the National List.
11 The motion was made by Lisa and seconded by
12 Steve. A yes vote is to remove; a no vote is
13 retain, and the voting will start with Lisa.

14 MEMBER DE LIMA: No.

15 MEMBER SCHWARTZ: No.

16 MEMBER ROMERO-BRIONES: No.

17 MEMBER OAKLEY: No.

18 MEMBER BAIRD: No.

19 MEMBER BUIE: No.

20 MEMBER SWAFFAR: No.

21 SECRETARY RICE: No.

22 VICE CHAIR BEHAR: No.

1 MEMBER SEITZ: No.

2 MEMBER MORTENSEN: No.

3 MEMBER ELA: No.

4 MEMBER BRADMAN: No.

5 MEMBER GREENWOOD: No.

6 CHAIRMAN CHAPMAN: Chair votes no.

7 SECRETARY RICE: That's 0 yes; 15 no;

8 0 absent.

9 CHAIRMAN CHAPMAN: Motion fails.

10 Lisa?

11 MEMBER DE LIMA: Next is magnesium

12 stearate.

13 DR. MATHEWS: At Section 205.605(b)
14 the listing is magnesium stearate for use only in
15 agricultural products labeled made with organic-
16 specified ingredients or food groups prohibited
17 in agricultural products labeled organic.

18 MEMBER DE LIMA: Asa?

19 MEMBER BRADMAN: So magnesium stearate

20 is a -- is used as an anti-caking agent salts.

21 Also a flow agent for processing machines. And

22 probably it seems like its dominant use based on

1 comments was as a binding material for
2 nutritional supplements and things like that.

3 It's --

4 PARTICIPANT: You might want to
5 speak --

6 MEMBER BRADMAN: Okay. Should I
7 repeat what I said? Everyone got it?

8 Anyways, so magnesium stearate is a --
9 probably the dominant use that I've seen in the
10 comments and users is that it's a binding agent
11 for nutritional supplements. There's not really
12 any big indications of significant human health
13 concerns, although there were a few comments
14 submitted a few references about some concerns of
15 the material as a salt and possible impacts on
16 renal health.

17 It's -- because of its use as a -- and
18 made with organic materials it's -- many --
19 there's actually relatively little concern with
20 this material and its presence on the list. And
21 among producers of nutritional supplements
22 related materials -- related products they

1 thought this was a relatively important material,
2 although it varied. Some people considered it
3 very important. Others felt that there were
4 alternatives, but it would add some costs.

5 There was also one comment in -- well,
6 a couple of comments that we should prohibit
7 animal sources of material to manufacture this,
8 that it should be limited to non-animal oils and
9 other materials to produce it partly out of
10 concerns of -- with the animals, GMO-related, but
11 also to provide a source for vegan or other non
12 -- vegetarian consumers.

13 So any discussion?

14 MEMBER DE LIMA: So I will say that
15 there are supplemental companies that
16 specifically call out that they're using
17 vegetarian magnesium stearate on the label.

18 MEMBER BRADMAN: And just to clarify,
19 people were requesting that we actually limit the
20 approval. too. I assume if we went that route,
21 that would be done in an annotation.

22 MEMBER DE LIMA: Tom?

1 CHAIRMAN CHAPMAN: And also kosher
2 certification is generally used as an information
3 shortcut to determine if it was from an animal
4 product or not.

5 MEMBER MORTENSEN: Tom, I didn't hear
6 that. Could you repeat that?

7 CHAIRMAN CHAPMAN: Kosher
8 certification is often used as an information
9 shortcut to determine whether or not the origin
10 product was from an animal or not.

11 MEMBER MORTENSEN: Thanks.

12 MEMBER DE LIMA: Harriet?

13 VICE CHAIR BEHAR: Well, as Lisa
14 mentioned, it could be mentioned in the
15 marketplace if it's a vegetarian source or not,
16 so the manufacturers can choose. I don't see any
17 reason to constrain it on our National List.

18 MEMBER BRADMAN: Right. One --

19 VICE CHAIR BEHAR: Unless the
20 Subcommittee wants to look at it as a work agenda
21 item.

22 MEMBER BRADMAN: One producer actually

1 indicated they derived it from organic rice
2 materials, so there's actually even an organic
3 source for it.

4 MEMBER DE LIMA: Tom?

5 CHAIRMAN CHAPMAN: The motion is to
6 remove magnesium stearate from the National List
7 The motion was made by Asa and seconded by Tom
8 Chapman. A yes vote is to remove; a no vote is
9 to retain, and the voting will start with Eric.

10 MEMBER SCHWARTZ: No.

11 MEMBER ROMERO-BRIONES: No.

12 MEMBER OAKLEY: No.

13 MEMBER BAIRD: No.

14 MEMBER BUIE: No.

15 MEMBER SWAFFAR: No.

16 SECRETARY RICE: No.

17 VICE CHAIR BEHAR: No.

18 MEMBER SEITZ: No.

19 MEMBER MORTENSEN: No.

20 MEMBER ELA: No.

21 MEMBER BRADMAN: No.

22 MEMBER GREENWOOD: No.

1 MEMBER DE LIMA: No.

2 CHAIRMAN CHAPMAN: Chair votes no.

3 SECRETARY RICE: That's 0 yes; 15 no;
4 0 absent.

5 CHAIRMAN CHAPMAN: Motion fails.

6 Lisa?

7 MEMBER DE LIMA: Next is phosphoric
8 acid.

9 DR. MATHEWS: At Section 205.605(b)
10 the listing is phosphoric acid, cleaning of food
11 contact surfaces and equipment only.

12 MEMBER DE LIMA: A-dae?

13 MEMBER ROMERO-BRIONES: Phosphoric
14 acid is used in cleaning and removing encrusted
15 surface matter and mineral scale found on metal
16 equipment such as boilers and steam-producing
17 equipment. We discussed this as part -- and
18 including phosphoric acid in our larger
19 discussion about sanitizers.

20 We had quite a few comments. The
21 majority was not -- if not all, suggested
22 relisting. There was one comment that suggested

1 seeking safer alternatives because it may have
2 some -- it does pose some environmental health
3 hazards, but right now it is probably one of the
4 most effective sanitizers for removing calcium
5 and mineral deposits.

6 MEMBER DE LIMA: Discussion from the
7 Board?

8 Harriet?

9 VICE CHAIR BEHAR: One of the reasons
10 why it's listed above as allowed as ingredients
11 is it's one of the few sanitizers that we have
12 that don't need a rinse off, which many process
13 sees as an important aspect.

14 MEMBER DE LIMA: Tom?

15 CHAIRMAN CHAPMAN: We have a motion to
16 remove phosphoric acid from the National List.
17 The motion was made by A-dae and seconded by
18 Scott. A yes vote is to remove; a no vote is to
19 retain, and the voting will start with A-dae.

20 MEMBER ROMERO-BRIONES: No.

21 MEMBER OAKLEY: No.

22 MEMBER BAIRD: No.

1 MEMBER BUIE: No.

2 MEMBER SWAFFAR: No.

3 SECRETARY RICE: No.

4 VICE CHAIR BEHAR: No.

5 MEMBER SEITZ: No.

6 MEMBER MORTENSEN: No.

7 MEMBER ELA: No.

8 MEMBER BRADMAN: I'm voting no. Can

9 I have a slight signing statement about -- that
10 we should recognize there may be concerns with
11 phosphates and waterways and that's something to
12 consider. We went to the resolution a bit before
13 I had a chance to mention that comment in
14 discussion. Thanks. So I'm voting no.

15 MEMBER GREENWOOD: No.

16 MEMBER DE LIMA: No.

17 MEMBER SCHWARTZ: No.

18 SECRETARY RICE: It's -- oh, Chair?

19 CHAIRMAN CHAPMAN: Oh, Chair votes no.

20 SECRETARY RICE: That's 0 yes; 15 no;

21 0 absent.

22 CHAIRMAN CHAPMAN: Motion fails.

1 Lisa?

2 MEMBER DE LIMA: Next is potassium
3 carbonate.

4 DR. MATHEWS: At Section 205.605(b)
5 the listing is potassium carbonate.

6 MEMBER DE LIMA: Scott?

7 SECRETARY RICE: Thank you. Sorry.
8 One moment.

9 (Pause.)

10 SECRETARY RICE: Just getting my
11 voting in order.

12 Potassium carbonate is commonly used
13 in the Dutch alkali process for processing cocoa
14 and chocolate to reduce the acidity. It's also
15 used as a pH control. It's a leavening agent,
16 boiler water additive and a number of other uses.
17 Also notable, used in -- as a buffering agent in
18 making wine and mead to reduce acidity.

19 There was widespread support for the
20 relisting of this material. And that's the
21 summary.

22 MEMBER DE LIMA: Any discussion?

1 Harriet?

2 VICE CHAIR BEHAR: Chocolate is

3 essential.

4 MEMBER DE LIMA: All right. Tom?

5 CHAIRMAN CHAPMAN: Motion is to remove

6 potassium carbonate from the National List. The

7 motion was made by Lisa and seconded by Scott. A

8 yes vote is to remove; a no vote is to retain,

9 and the voting will start with Emily.

10 MEMBER OAKLEY: No.

11 MEMBER BAIRD: No.

12 MEMBER BUIE: No.

13 MEMBER SWAFFAR: No.

14 SECRETARY RICE: No.

15 VICE CHAIR BEHAR: No.

16 MEMBER SEITZ: No.

17 MEMBER MORTENSEN: No.

18 MEMBER ELA: No.

19 MEMBER BRADMAN: No.

20 MEMBER GREENWOOD: No.

21 MEMBER DE LIMA: No.

22 MEMBER SCHWARTZ: No.

1 MEMBER ROMERO-BRIONES: No.

2 CHAIRMAN CHAPMAN: Chair votes no.

3 SECRETARY RICE: That's 0 yes; 15 no;
4 0 absent.

5 CHAIRMAN CHAPMAN: Motion fails.

6 Lisa?

7 MEMBER DE LIMA: Next is sulfur
8 dioxide.

9 DR. MATHEWS: At Section 205.605(b)
10 the listing is sulfur dioxide for use only in
11 wine labeled made with organic grapes provided
12 that total sulfite concentration does not exceed
13 100 ppm.

14 MEMBER DE LIMA: Steve?

15 MEMBER ELA: I think we should note
16 the essentiality of wine, similar to chocolate;
17 often used together, I've noticed.

18 (Laughter.)

19 MEMBER ELA: Again similar comments
20 this fall as compared to the spring about the
21 essentiality of this material for the use in wine
22 making, especially to prevent spoilage and to

1 protect flavor and longstanding quality.

2 Basically really no negative comments.

3 I mean, we recognize people have sulfite
4 allergies, but they're labeled. I think the only
5 other comment from a couple people were that the
6 100 parts per million was excessive and could be
7 limited to a lower amount which would require an
8 annotation change and a different work agenda
9 item.

10 And there was; I know it's come up in
11 the past that it's currently for use only in wine
12 made with organic grapes, but there are -- is the
13 cider industry and the berry industry and such.
14 So one commenter said it should be -- that should
15 be loosened to be made with organic fruit rather
16 than just organic grapes. But that's really out
17 of our purview in the sunset review. So no
18 negative comments and essential to the wine
19 industry.

20 MEMBER DE LIMA: Any discussion?

21 Harriet?

22 VICE CHAIR BEHAR: I remember, I think

1 it was two sunsets ago this was quite a
2 controversial material. There were wine makers
3 that wanted it to come off the list because you
4 could make wine without it. I don't see them
5 here clamoring for that because I believe in the
6 marketplace they've been able to distinguish
7 themselves as no sulfites, and so therefore --
8 and then declare their wine as organic wine. So
9 I think that the annotation and listing as stands
10 is working for everyone.

11 MEMBER DE LIMA: Any other discussion?

12 (No audible response.)

13 MEMBER DE LIMA: Tom?

14 CHAIRMAN CHAPMAN: Okay. We have a
15 motion to remove sulfur dioxide from the National
16 List. The motion was made by Steve and seconded
17 by Eric. A yes vote is to remove; a no vote is
18 to retain, and the voting will start with Sue.

19 MEMBER BAIRD: Concur wine is
20 essential. No.

21 MEMBER BUIE: No.

22 MEMBER SWAFFAR: No.

1 SECRETARY RICE: No.

2 VICE CHAIR BEHAR: No.

3 MEMBER SEITZ: No.

4 MEMBER MORTENSEN: No.

5 MEMBER ELA: No.

6 MEMBER BRADMAN: No.

7 MEMBER GREENWOOD: No.

8 MEMBER DE LIMA: No.

9 MEMBER SCHWARTZ: No.

10 MEMBER ROMERO-BRIONES: No.

11 MEMBER OAKLEY: No.

12 CHAIRMAN CHAPMAN: Chair votes no.

13 SECRETARY RICE: That's 0 yes; 15 no;
14 0 absent.

15 CHAIRMAN CHAPMAN: Motion fails.

16 Lisa?

17 MEMBER DE LIMA: Next is xanthan gum.

18 DR. MATHEWS: At Section 205.605(b)
19 the listing is xanthan gum.

20 MEMBER DE LIMA: All right. So
21 xanthan gum is used in numerous food products
22 some of which include baked goods, beverages,

1 dairy products, dressings, nutritional
2 supplements, frozen foods. Gum is used in small
3 percentages of the finished product, usually less
4 than 0.5 percent by weight. It disperses water
5 giving a thickening and gelling effect.

6 It's also often used with other gums
7 to achieve desired viscosities and product
8 structure. It's particularly effective in frozen
9 and chilled products where it can impart
10 thickness, freeze-thaw protection and stability
11 during processing. Common gums that it's used
12 along with are locust, guar and carrageenan.

13 It's allowed for use in organics
14 internationally in Canada, the EU, Japan and by
15 IFOAM. And it's also commercially available to
16 consumers to buy, often used in gluten-free
17 baking and other recipes.

18 As far as public comment a number of
19 organizations, certifiers and manufacturers
20 expressed support for the material with one large
21 certifier stating that of the gums xanthan is the
22 most commonly found in their OSPs. One

1 manufacturer stated that organic gums didn't have
2 the same functionality in their organic baked
3 goods as xanthan did. One organization commented
4 that it should be removed from the National List
5 unless it's listed for essential uses. And we
6 heard from a retailer that thought it should be
7 delisted as well due to consumer concerns.

8 There were also comments around
9 classification. The petitioner and an
10 organization want to see it reclassified as a
11 non-synthetic. And then others wrote in
12 requesting that the NOSB come up with a policy
13 that can be applied when evaluating products of
14 fermentation as far as classification and
15 compatibility with organics.

16 I do want to point out that in 2016
17 the Handling Subcommittee decided after reviewing
18 an updated TR that xanthan gum could be produced
19 by various methods that could result in both a
20 non-synthetic or a synthetic and that we decided
21 to not move forward with a reclassification.

22 Any discussion?

1 Dave?

2 MEMBER MORTENSEN: So I have the same
3 concerns here, and I will just raise one point
4 and then be quiet. There is a possibility that a
5 reason why the EU would see this differently is
6 that they don't grow GM crops for the most part.
7 So that concern would be less severe there since
8 virtually no GM crops are grown in Europe, or at
9 least not the ones that are used in the
10 fermentation process. Thanks.

11 MEMBER DE LIMA: All right. Tom?

12 CHAIRMAN CHAPMAN: All right. We have
13 a seconded motion from the Subcommittee. The
14 motion is to remove xanthan gum. Motion was made
15 by Lisa and seconded by Scott. A yes vote is to
16 remove; a no vote is to retain the listing, and
17 the voting will start with Jesse.

18 MEMBER BUIE: No.

19 MEMBER SWAFFAR: No.

20 SECRETARY RICE: No.

21 VICE CHAIR BEHAR: No.

22 MEMBER SEITZ: No.

1 MEMBER MORTENSEN: Yes.

2 MEMBER ELA: No.

3 MEMBER BRADMAN: No.

4 MEMBER GREENWOOD: No.

5 MEMBER DE LIMA: No.

6 MEMBER SCHWARTZ: No.

7 MEMBER ROMERO-BRIONES: No.

8 MEMBER OAKLEY: No.

9 MEMBER BAIRD: No.

10 CHAIRMAN CHAPMAN: Chair votes no.

11 SECRETARY RICE: That's 1 yes; 14 no;

12 0 absent.

13 CHAIRMAN CHAPMAN: Motion fails.

14 So it's now 10:55. That's the end of

15 the 205.605 listings. I think we can break here.

16 We'll come back to order at 11:10 and continue

17 with sunset and then move onto the rest of the

18 Handling Subcommittee meeting. Please be back

19 promptly at 11:10 or we will have a late lunch.

20 We're in recess.

21 (Whereupon, the above-entitled matter

22 went off the record at 10:55 a.m. and resumed at

1 11:10 a.m.)

2 MR. CHAPMAN: If board members could
3 take their seats, we're about to get started.

4 (Pause.)

5 MR. CHAPMAN: All right. If the board
6 members could take their seat we'll come back
7 into order. All right, we'll come back into
8 order. And a quorum of members is present. We
9 will turn back to the Handling Subcommittee,
10 Lisa.

11 MR. RICE: All right. Next up is
12 fructooligosaccharides, FOS from here on out.

13 MS. DE LIMA: Okay. We're moving into
14 Section 205.606 on the National List,
15 nonorganically produced agriculture products
16 allowed as ingredients in or on processed
17 products labeled as organic.

18 At paragraph (e) we have the listing
19 fructooligosaccharides CAS No. 308066-66.2.

20 MR. CHAPMAN: Fructooligosaccharides
21 is on the list as a nonorganically produced
22 agricultural product allowed in organic products,

1 boxes, and nondigestible carbohydrate that's used
2 a soluble prebiotic fiber, sweetening agent,
3 flavor enhancer, bulking agent, and is used in
4 many foods, including yogurts, infant foods,
5 medical foods, baked goods, candies, soups,
6 beverages, and other dairy products.

7 Public comment from interest groups
8 objected to its listing saying that it's highly
9 processed and is not a necessary component of
10 organic foods. Concerns were also raised around
11 fermentation.

12 Other commenters, particularly organic
13 industry and some trade associations, as well as
14 nutrition councils commented on its use as a
15 prebiotic. It's widely used as an essential
16 prebiotic in infant formulas in place of human
17 milk oligosaccharides that would be found in
18 breast milk.

19 Historically -- this was not in public
20 comment -- historically this was widely used in
21 the, in the yogurt industry and in infant foods.
22 The yogurt industry use seems to have declined,

1 but it is still an additive in almost every
2 infant formula out there on the market.

3 MS. DE LIMA: Discussion from the
4 board? Harriet?

5 MS. BEHAR: Usually I don't like
6 voting to put something on the National List
7 that's more than 15 to 20 letters but, or
8 difficult to pronounce, but I realize we
9 shouldn't be prejudiced and read the
10 documentation. And so, I think this is a useful
11 product, even though it might look to consumers
12 who are looking for a clean label as something
13 that they might not like.

14 So we might need a little more
15 education on it, but I think it's acceptable.

16 MS. DE LIMA: And then I will say as
17 a retailer, it's not a question I've seen come
18 up as far as clean label and asking what it is.

19 Emily and then Dave.

20 MS. OAKLEY: Okay. Question for
21 Harriet then. In terms of the public comment
22 addressing this as a highly processed product,

1 so, and nonessential, I guess the one area of
2 concern might be in infant formula, primarily for
3 me. Could someone address that?

4 MR. CHAPMAN: I heard, I heard that --
5 I didn't hear the connection to the question.
6 Could you repeat that?

7 MS. OAKLEY: Definitely wasn't very
8 clear.

9 MR. CHAPMAN: I just heard infant
10 formula and highly processed, but.

11 MS. OAKLEY: Yes. So that wasn't a
12 clear question. You're right.

13 Are there alternatives in infant
14 formula? And I do have concerns and felt that
15 the argument laid out by some of the public
16 commenters about its highly processed nature were
17 compelling.

18 MR. CHAPMAN: From the public comment
19 that I read, this is the accepted use material
20 from American Medical Association and the
21 American Pediatric Association for infant
22 formulas. So, I am unaware of an alternative for

1 infant formulas.

2 There is some mention of glucosuria
3 saccharides, which is a similar compound, but
4 it's extremely similar. So it's a, what's the
5 saying, six of one, half dozen of the other. And
6 I'm unaware of that product being available in an
7 organic formula.

8 MS. DE LIMA: Dan.

9 MR. MORTENSEN: Could someone on the
10 subcommittee give us a sense for there are two
11 forms, inulin-derived and sucrose-derived. The
12 sucrose-derived -- and I don't want to sound like
13 a broken record, but sugar beets in the United
14 States are almost entirely genetically modified
15 these days. So if, if it's derived from sugar
16 beets versus the proportion from inulin, I don't
17 know anything about that.

18 MR. CHAPMAN: So this is a 606 item.
19 It's an agricultural item. And the exclusion on
20 excluded methods would be fully applicable to
21 this material.

22 MR. MORTENSEN: Meaning that they

1 would source organic sugar beets some or non, or
2 conventional non-transformed if that's the
3 source?

4 MR. CHAPMAN: I would believe -- I
5 don't believe they would source organic sugar
6 beets. I'm unaware of any of those in the U.S.
7 But I do believe they would source convention
8 non-genetically engineering sugar beets. But I
9 don't know of the certifier on the board could
10 speak more to that.

11 MR. RICE: Yes. Like any agricultural
12 product you would have an ingredient affidavit
13 that would verify the non-GMO status of this
14 product.

15 MR. MORTENSEN: I'm having a hard time
16 hearing some of this. Could you repeat that,
17 please?

18 MR. RICE: As an agricultural
19 ingredient you would have an affidavit that the
20 certifier would verify that is the suppli -- or,
21 excuse me, the certified operation would submit
22 verifying the source form a non-GMO source.

1 MR. MORTENSEN: Thank you.

2 MS. DE LIMA: Dan.

3 DR. SEITZ: So, several commenters
4 said that this had just been more of a fad at
5 some point and that there were certain health
6 claims that could be made by virtue of having
7 this. And that use had dropped off substantially
8 and that, you know, there was some question
9 around these various claims.

10 So I'm curious to know from those of
11 you who work with products that have this, what
12 seems to be still essential about this in terms
13 of processed foods? And can you speak up, Tom?

14 MR. CHAPMAN: Yes. Can you hear me,
15 Dan?

16 DR. SEITZ: Yes.

17 MR. CHAPMAN: Okay. So it's a
18 prebiotic. And prebiotics have, you know, been
19 around. We've seen them come and go as fads,
20 prebiotics and probiotics. And as I mentioned in
21 my opening comments, it was very common for a
22 while to have prebiotics in yogurts because

1 you're also getting active cultures. And so you
2 get both of those at the same time to promote
3 health.

4 That activity has seemed to have waned
5 to some extent. But it's usage in infant
6 formulas, and I was remiss in mentioning also
7 medical foods so folks are fed intrally. It's
8 use a prebiotic is still fairly essential in that
9 application since there are not -- it doesn't
10 come through the normal pathways that you would
11 get that, so, human breast milk, for example.

12 I understand people's concerns with
13 infant formula. And I'm not here to debate them.
14 But they are, you know, infant formulas strive to
15 match a natural product and the constituents
16 therein. And sometimes to get it to match you
17 need to refer -- you need to use some highly
18 processed products to get it as close to human
19 breast milk as possible.

20 Did that, did that answer your --
21 yeah.

22 DR. SEITZ: Thanks.

1 MS. DE LIMA: All right, I don't see
2 any other discussion. Tom.

3 MR. CHAPMAN: All right. We have a
4 motion to remove fructooligosaccharides from
5 205.606. The motion as made by Tom. It was
6 seconded by Lisa. A yes vote is to remove, a no
7 vote is to retain.

8 And someone's mike is giving us
9 feedback.

10 The voting will start with Ashley.

11 MR. SWAFFAR: No.

12 MR. RICE: No.

13 MS. BEHAR: No.

14 DR. SEITZ: No.

15 MR. MORTENSEN: No.

16 MR. ELA: No.

17 MR. BRADMAN: No.

18 DR. GREENWOOD: No.

19 MS. DE LIMA: No.

20 MR. SCHWARTZ: No.

21 MS. ROMERO-BRIONES: No.

22 MS. OAKLEY: Yes.

1 MS. BAIRD: No.

2 MR. BUIE: No.

3 MR. CHAPMAN: Chair votes no.

4 MR. RICE: There was one yes, 14 no,
5 0 absent.

6 MR. CHAPMAN: The motion fails.

7 Lisa.

8 MS. DE LIMA: Next up gums, arabic,
9 guar, locust, and carob. It's Section
10 205.606(g). The listing is gums -- water
11 extracted only (Arabic, Guar, Locust bean, and
12 Carob bean.)

13 DR. MATHEWS: So all these gums are
14 extracted from the endosperm of plants via water
15 processing and then dried and milled. They are
16 used in various food applications due to their
17 ability to modify the viscosity of products
18 through the binding of water and the generation
19 of jelling effects, and also used as thickening
20 agents.

21 And due to the structure of the gums,
22 each gum behaves slightly differently at

1 different temperatures, pH ranges, physical
2 agitation, and so on.

3 These gums are allowed for use in
4 organics internationally, in Canada, the EU,
5 Japan, and by IFOAM.

6 During public comment I think all but
7 one public comment was in support of relisting
8 these gums.

9 There were questions around the
10 availability of organic versions. One
11 manufacturer noted that they source organic guar
12 and locust, but are in favor of retaining on the
13 list because they don't know if the organic
14 supply is adequate.

15 Another said they were able to source
16 organic arabic for the last two years, but due to
17 weather extremes and political situations where
18 the substance is grown there's been a long
19 history of supply interruptions.

20 One organization thought we should
21 investigate whether there is gum arabic that
22 could be certified as wild crafted organic, as

1 well as the availability of organic carob and
2 locust bean gum.

3 So we did -- I just want to update
4 everyone -- we did discuss in subcommittee after
5 the spring meeting where similar requests were
6 made in public comment to list the gums
7 separately so that individual gums could be
8 delisted in the future. And we discussed it.
9 And we discussed it with the program.

10 He let us know that we could do that,
11 but it's not really necessary because even though
12 they're listed as a single line on 606(j), any
13 one of them could be recommended for removal. An
14 example of this was the board did something
15 similar on the Crops Subcommittee last year. We
16 delisted vitamins B, C and E. And they had two
17 different motions which allowed them to remove
18 one of the gums.

19 So when we got to that point where we
20 see that there is availability of one of these
21 gums, organic commercially available, we can
22 still go ahead and do that without having to go

1 through the process of listing them separately on
2 the national list. Tom.

3 MR. CHAPMAN: So in my role I do
4 source organic gum arabic. We are not a large
5 producer of the product, but we are able to
6 successfully source it organically today.
7 However, I also support the retaining of this
8 listing. And I think the commercial availability
9 exceptions are working out well here because I
10 think a lot of folks are sourcing organic
11 versions of these gums, where available.

12 The big concern with a lot of these
13 gums is they come from Sub-Saharan African from
14 some countries that have a history of political
15 instability. And so while they might be
16 available for four years in a row, they will
17 suddenly potentially dry up from time to time,
18 depending on the political climate and what's
19 going on in that region, or also weather events
20 in that region as well.

21 And so at that point, knowing the
22 length of time it takes to get a product back on

1 the list, you know, you're looking at 18, 24, 36
2 months, or even longer before you could do that.
3 That's going to impact all those processed
4 products and that soft serve ice cream you like
5 so much, which is also essential. You know, just
6 going to have to do something in the interim
7 here.

8 So in that regard, and knowing that
9 there's a commercial availability here that's
10 forcing folks to go out and source these
11 products, there's not that many different forms
12 of these products so it's quite clear cut, I
13 think, from the certifier's perspective if
14 someone truly tried to source this organic or
15 not. I think it's important to retain the
16 listings.

17 MS. DE LIMA: Harriet.

18 MS. BEHAR: So, I'm just wondering in
19 the discussion with anyone who is already
20 sourcing it, have they looked at trying to work
21 in other areas of the world for production or
22 not? I don't know if Tom wants to speak to that.

1 Because, you know, I would think that there would
2 not only be one tiny place where it could grow.
3 And there are many countries that would like to
4 benefit from organic production.

5 MR. CHAPMAN: We haven't tried to
6 source from other regions because we're
7 successfully sourcing organic at this time. I
8 also, I don't know, I don't particularly want to
9 pull a cash crop out of a developing country if I
10 don't need to do that either.

11 That being said, I mean, these aren't
12 all created equally. And there's probably a
13 greater availability for some than others. I'm
14 aware of guar being successfully grown in a
15 couple different climates. It's not a product I
16 source, so I'm not actively involved in it. But
17 there are some.

18 I'm not close enough to these trees,
19 but gum arabic's been a valuable commodity for an
20 extremely long time. If it was newly grown in
21 other areas other than Sudan, I think, I think
22 people would have economically taken advantage of

1 it at this point.

2 MS. DE LIMA: The only public comment
3 I saw as far as domestic grown gums was guar gum.
4 And that was not organic.

5 MS. BEHAR: If it could be done in
6 another developing country also.

7 But I'm not necessarily saying that
8 that's what we want to see is just for organic
9 production to damage someone else, but especially
10 when it's in a region where the production could
11 be, you know, scarce or, you know, kind of up and
12 down, that trying to have something more stable
13 would also be to the benefit not just of the
14 growers, because these are perennial crops, but
15 also for the manufacturers that then want to work
16 with those for the long term.

17 MS. DE LIMA: All right, seeing no
18 more discussion, Tom.

19 MR. CHAPMAN: All right. So, we have
20 a motion to remove gum arabic, locus bean gum,
21 carob gum, and guar gum from the National List.
22 The motion was made by Lisa and seconded by

1 Scott.

2 A yes vote is to remove. A no vote is
3 to retain. And the voting will start with Scott.

4 MR. RICE: No.

5 MS. BEHAR: No.

6 DR. SEITZ: No.

7 MR. MORTENSEN: No.

8 MR. ELA: No.

9 MR. BRADMAN: No.

10 DR. GREENWOOD: No.

11 MS. DE LIMA: No.

12 MR. SCHWARTZ: No.

13 MS. ROMERO-BRIONES: No.

14 MS. OAKLEY: No.

15 MS. BAIRD: No.

16 MR. BUIE: No.

17 MR. SWAFFAR: No.

18 MR. CHAPMAN: Chair votes no.

19 MR. RICE: That's 0 yes, 15 no, 0

20 absent.

21 MR. CHAPMAN: The motion fails. Lisa.

22 MS. DE LIMA: Next up, lecithin, de-

1 oiled.

2 DR. MATHEWS: At Section 205.606(k).

3 The listing is lecithin, de-oiled.

4 MS. DE LIMA: A-dae.

5 MS. ROMERO-BRIONES: So, lecithin is
6 a substance isolated as a gum following hydration
7 of solvent extracted soy, safflower or corn oils.
8 We also noted in the comments that it's also
9 derived from sunflower oil.

10 It has a wide range of applications,
11 including emulsification, or these properties:
12 wetting, dispersing, and texturization. It's
13 included in a wide variety of products, from
14 chocolates to margarines to powders to release
15 sprays to baked goods.

16 The comments were pretty split on
17 whether to relist. The question is whether there
18 is a commercial availability of non-soy lecithin.
19 And based on conversations with certifiers in the
20 stakeholder community here, there is some non-soy
21 organic forms of lecithin de-oiled available.

22 Organic soy lecithin is available.

1 One of the comments, or several of the
2 commenters said that delisting this would allow
3 the organic non-soy lecithin de-oiled products to
4 become -- the market to expand. Keeping it on
5 the list would chill the market.

6 And the comments on the other side of
7 the table said that non-soy lecithin de-oiled
8 organic products are unstable and not in a
9 consistent supply. And based on conversations
10 with some of the stakeholders there are --
11 there's an increase in the availability of
12 lecithin de-oiled products, both soy and non-soy,
13 generally.

14 MS. DE LIMA: Discussion? Emily.

15 MS. OAKLEY: So, A-dae, what does that
16 lead you to conclude?

17 MS. ROMERO-BRIONES: That there is
18 lecithin de-oiled organic products available,
19 both soy and sunflower.

20 MS. OAKLEY: So would you vote to
21 remove, to increase the market? I know one
22 commenter said the rulemaking process is lengthy

1 enough that within several years that market is
2 very likely to have fully caught up. I mean, of
3 course that's speculation. But what are your
4 thoughts?

5 MS. ROMERO-BRIONES: Absolutely. So
6 it is speculation. I am going to vote to remove
7 it just based on the conversations I have had
8 with several certifiers that are in the room
9 today. So I am going to vote to remove it.

10 MS. DE LIMA: Sue, then Tom, then
11 Ashley, then Harriet.

12 MS. BAIRD: Given that there are other
13 sources now available have the commenters
14 submitted documentation that each of those types
15 of lecithins would work the same in the products?
16 Because sometimes that's an issue.

17 MS. ROMERO-BRIONES: So currently --
18 so, some of the commenters mentioned that
19 products are using both non-organic lecithin de-
20 oiled and organic lecithin de-oiled, depending on
21 the supply and the consistency. So I think it's
22 a question of supply as opposed to, like,

1 alternative products or differentiation of the
2 lecithin. It's a matter of supply.

3 MS. DE LIMA: Tom.

4 MR. CHAPMAN: So, years ago fluid
5 lecithin was also listed. It got delisted
6 through a petition process by which, even with
7 the product showing on the National List, someone
8 was able to develop an organic market for fluid
9 soy lecithin and petitioned the NOSB to remove
10 it.

11 It was a successful case of industry
12 finding a market despite the material being on
13 606, one that we've heard heralded several times,
14 including with hops, the process right now in
15 glycerin. And at the last meeting -- sorry, at
16 the last 2017 sunset, which was what, 2015, in
17 the 2014 sunset there were several agricultural
18 items removed from 606, or recommended for
19 removal from 606 that demonstrates that it is
20 possible to build a market for this material when
21 it's listed here.

22 I would also say that soy de-oiled

1 lecithin is widely available now, and can also be
2 sourced.

3 The issue comes to non-allergenic
4 forms of lecithin. And that's the area that is
5 not as readily available, particularly in the
6 fluid side but also in the de-oiled side.
7 Generally you have a fluid market, and the de-
8 oiled market kind of falls behind it and requires
9 a bit more processing.

10 Sunflower is the primary non-
11 allergenic form of lecithin on the market,
12 although there is a couple others, canola, grape
13 seed. So far we have not found sunflower oil
14 lecithin to be readily available on a consistent
15 basis. There's no manufacturers in the U.S.
16 It's a derivative product of oil manufacturing.
17 All these are deriv -- all lecithins are
18 derivative products of oil manufacturing.

19 And so, organic sunflower oil by and
20 large comes out of the Ukraine. The Ukraine has
21 been a semi-politically unstable country for the
22 last three or four years given their conflicts

1 with Russia. And it hasn't always been
2 available. It's developing. It is close.

3 And I am aware of domestic
4 manufacturers are putting in capabilities to be
5 able to product this from the amount of sunflower
6 oil that's -- organic sunflower oil that's
7 refined here domestically. But that being said,
8 it's not there right now. And a lot of things
9 can change between now and then.

10 You know, my vote and my
11 recommendation here is going to be to relist it
12 at this time. But, again, this market is
13 developing with the 606 listing. Certifiers are
14 able to go out and enforce 606 commercial
15 availability quite, quite clearly on this
16 material. And but I do encourage future if this
17 does get relisted, I encourage future NOSBs to
18 really take a critical eye to it because we're at
19 the precipice of this becoming a standard
20 available organic item. It's just not there
21 right now.

22 MS. DE LIMA: Ashley.

1 MR. SWAFFAR: Yes. So I just want to
2 point out though, it's a comment. This spring
3 that said our consumers avoid soy, so we
4 primarily use sunflower lecithin. Most is
5 organic, but we have had to use the non-organic
6 at times due the supply availability. And that
7 sunflower crop I know in the U.S., because
8 chickens do use sunflower in seed also sometimes,
9 is pretty unstable getting a harvest out of that
10 crop every year.

11 So that's why you can see supply come
12 and go in an organic form. Some years it's
13 there, some years it's not.

14 And I just want to point 606 listing,
15 for everybody that may not understand that
16 language 100 percent, there if someone is going
17 to use sunflower de-oiled lecithin they have to
18 use organic if it's available. The certifier
19 will make them do that. So, if that is
20 available, they have to use that. If not, then
21 they can drop down to the non-organic form.

22 So I like retaining this material on

1 606 for those years that those sunflower crops do
2 fail. I think that's critical because there may,
3 there may be availability this year but not next
4 year, depending on how the harvest is. So I
5 think it's critical to keep this on the list.

6 MS. DE LIMA: Harriet.

7 MS. BEHAR: Two things. One is, when
8 the certifier is asking if it is available, then
9 you must use it. I have seen some manufacturers
10 talk about the unstable production, so they say,
11 well, I can't, I don't want to have -- I'd love
12 to write "organic" on my label but I'm not going
13 to. And then, therefore, I want to use the non-
14 organic. And some certifiers still mandate maybe
15 the organic but others do not.

16 And that does seem like a reasonable
17 request from the processor.

18 So I'm wondering if on the work agenda
19 we could split out the various lecithins in the
20 future because we can't annotate now. But if we
21 had different lecithins then it would pave the
22 way at the next sunset, or even before if

1 somebody petitioned, to take off the soybean
2 lecithin de-oiled and retain the sunflower.

3 And I'm not sure, I guess it would
4 take a little bit more review because I think it
5 could come from eggs and, I mean, there's other
6 sources of lecithin. Do, just do a little bit of
7 research on what is commercially used of lecithin
8 de-oiled, and then split that out and then we
9 would then be able to take the soybean oil off
10 and encourage the growth of that industry and
11 reward them for their activity in organic
12 production, and keep the ones that we feel we
13 strongly need.

14 MS. DE LIMA: Steve.

15 MR. ELA: It's fascinating to hear
16 this debate because this is a world that I don't
17 live in. And so, but I'm a little hesitant to,
18 while I want to see the organic market expand I'm
19 a little hesitant to delist it on the thought
20 that by the time it gets through rulemaking it
21 will ready, partly because we know, I mean we've
22 seen from other substances that when it goes to

1 public comment for rulemaking some manufacturers
2 are going to say this is going to cause me
3 economic hardship, and then it's going to get
4 derailed.

5 And so I guess before we send it to
6 the NOP for rulemaking to delist it, I'd like to
7 have our case pretty solid and not speculative
8 that, you know, this is, this is real.

9 So I tend to fall on Tom's side that
10 I'm leaning towards relisting it now, but the
11 next go-round really giving it a, you know,
12 really giving it a crucial eye and saying, okay,
13 we should be there.

14 MS. DE LIMA: Yes, I echo what Steve
15 said. I'm definitely not at a place where I'm
16 comfortable delisting. Scott.

17 MR. RICE: Yeah, I'd just reiterate
18 what's been said and reiterate again. But also
19 just emphasize that, you know, part of the
20 process in reviewing any product formulation
21 would be around the material would be looking for
22 some sort of evidence that that manufacturer made

1 an effort to source an organic source where an
2 organic source would likely be found.

3 MS. DE LIMA: Any other discussion?

4 (No audible response.)

5 MS. DE LIMA: All right. Tom.

6 MR. CHAPMAN: Okay. We have a motion.

7 MS. DE LIMA: Dave?

8 MR. MORTENSEN: If we could, just for
9 another two minutes.

10 MS. DE LIMA: Yes.

11 MR. MORTENSEN: So I'm just slightly
12 confused exactly what we're voting on here.
13 We're voting to keep this on. If this wasn't on,
14 or even if it is on, on the list as written,
15 would we, are we saying that there could be an
16 organic soybean-derived only lecithin de-oiled
17 that would be added to the list later?

18 Is that what we're saying or not? I'm
19 confused.

20 MS. DE LIMA: So, right now we're
21 simply voting on whether we're going to relist or
22 not relist de-oiled lecithin. That includes all

1 forms: soy, sunflower, whatever.

2 Later on the subcommittee could decide
3 if they want to explore Harriet's suggestion of
4 splitting the listing out into -- and we have to
5 talk to the program, too -- into different
6 sources so that it might be easier to take the
7 soy off and leave the other forms that are
8 unstable, availability-wise unstable on the list.

9 MR. MORTENSEN: Thank you, Lisa.

10 MS. DE LIMA: Ashley.

11 MR. SWAFFAR: Yes. Dave, just to
12 follow up on that, the 606 listing where it's at,
13 they have to use an organic form if it's
14 available. So they have to use organic soy if
15 it's available.

16 MR. CHAPMAN: Okay. So, we have a
17 motion to remove lecithin de-oiled from the
18 National List. The motion was made by A-dae and
19 seconded by Eric.

20 A yes vote is to remove. A no vote is
21 to relist. And the voting will start with
22 Harriet.

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MS. BEHAR: No.

DR. SEITZ: Yes.

MR. MORTENSEN: No.

MR. ELA: No.

MR. BRADMAN: No.

DR. GREENWOOD: No.

MS. DE LIMA: No.

MR. SCHWARTZ: No.

MS. ROMERO-BRIONES: Yes.

MS. OAKLEY: Yes.

MS. BAIRD: No.

MR. BUIE: No.

MR. SWAFFAR: No.

MR. RICE: No.

MR. CHAPMAN: Chair votes no.

MR. RICE: There's 3 yes, 12 no, 0

absent.

MR. CHAPMAN: Motion fails. Lisa.

MS. DE LIMA: Emily.

MS. OAKLEY: Sorry. Just a point of clarification. I think this vote will be helpful to future NOSB reviews and might augment the

1 level of scrutiny.

2 MR. CHAPMAN: If I could add on that.
3 I mean, it went through a high level of scrutiny,
4 so I'm not sure if augmentation of that is
5 necessary. But, you know, I'd really encourage
6 future NOSBs to take a hard look at this and see
7 if the market has developed further.

8 MS. DE LIMA: Harriet.

9 MS. BEHAR: I just want to encourage
10 the subcommittee to consider a work agenda item
11 to split this into numerous forms of lecithin de-
12 oiled.

13 MS. DE LIMA: All right. Moving on to
14 tragacanth gum.

15 DR. MATHEWS: At Section 205.606(q)
16 the listing is tragacanth gum, CAS No. 9000-65-1.

17 MS. DE LIMA: All right. So, this gum
18 is prepared from the sap of various species of
19 legumes. It can form jells and be used as a
20 thickener and emulsifier. It's effective at low
21 pH and at many temperatures. And it's stability
22 at low pH is one of its distinguishing

1 characteristics.

2 Percentage used in the final product
3 is usually low, below 1 percent. And this gum is
4 allowed for use in organics internationally.

5 So, this is one of those ones we
6 reviewed a couple years ago in Stowe. And at
7 that time we had one producer come forward in
8 favor because they were using it. This time
9 around, did not have any manufacturers come
10 forward saying they were using it. And we had
11 one organization point out there could be
12 potential health effects and according to the
13 Center for Public Science that people were having
14 allergic reactions, and thought that needed to be
15 taken into consideration.

16 I will say that one manufacturer that
17 came forward last time is still using it. So I'm
18 not sure why they didn't come forward. But,
19 again, an example of people sort of losing track
20 or not paying attention necessarily to what we're
21 doing because I do see it's still in that one
22 product. Harriet.

1 MS. BEHAR: It's noted here -- does
2 somebody remember, I don't remember what the
3 mitigation steps are to reduce the microbial
4 load?

5 MS. DE LIMA: Where are you reading
6 that?

7 MS. BEHAR: In the manufacture, in the
8 powder. Just somebody could look at the TR.

9 And then also was there any discussion
10 about growing it organically? Astragalus is
11 actually a native to North America. It's growing
12 on my farm.

13 MS. DE LIMA: There was no public
14 comment about that being grown and processed
15 organically. Dan.

16 DR. SEITZ: On a couple of the
17 substances that are under review commenters have
18 made the point that when they were first approved
19 information was withheld on the manufacturer
20 based on, what is that, CBI --

21 MS. DE LIMA: Yes, CBI.

22 DR. SEITZ: -- yeah, CBI, you know, of

1 proprietary information.

2 And I just would like to suggest to us
3 that if something has been approved in the past
4 without the full information, that we may
5 routinely want to get a TR the next time it comes
6 up just so that when it comes to relisting we do
7 have full information. I'm not saying, we don't
8 have time to do that here, but I think it's just
9 a good practice on our part.

10 MS. DE LIMA: So I just want to
11 clarify that that was not -- there was no public
12 comment received about that for this particular
13 gum because this gum is not a product of
14 fermentation. This is on 606. So that was in
15 reference to the gums that are on 605(b).

16 DR. SEITZ: Great. So then I'll just
17 apply my comment to those.

18 MS. DE LIMA: Okay.

19 DR. SEITZ: Okay.

20 MR. CHAPMAN: If I can also note, we
21 did get a TR on gums this round.

22 MS. DE LIMA: Yes.

1 MR. CHAPMAN: So if that's what you
2 asked.

3 DR. SEITZ: Sure. Okay, but just in
4 general I've seen that point made, and I think
5 that would be a good practice.

6 MS. DE LIMA: Any other discussion?

7 (No audible response.)

8 MS. DE LIMA: All right, Tom.

9 MR. CHAPMAN: Okay. We have a motion
10 to remove tragacanth gum from the National List.
11 The motion was made by Lisa and seconded by
12 Steve, that motion to remove.

13 So, a yes vote is to remove. A no
14 vote is to retain. And the voting will start
15 with Dan.

16 DR. SEITZ: No.

17 MR. MORTENSEN: No.

18 MR. ELA: No.

19 MR. BRADMAN: No.

20 DR. GREENWOOD: No.

21 MS. DE LIMA: No.

22 MR. SCHWARTZ: No.

1 MS. ROMERO-BRIONES: No.

2 MS. OAKLEY: No.

3 MS. BAIRD: No.

4 MR. BUIE: No.

5 MR. SWAFFAR: No.

6 MR. RICE: No.

7 MS. BEHAR: No.

8 MR. CHAPMAN: Chair votes no.

9 MR. RICE: That's 15 -- 0 yes, 15 no,
10 0 absent.

11 MR. CHAPMAN: The motion fails. Lisa.

12 MS. DE LIMA: All right. I think
13 that's it for sunset materials. The next step,
14 we're moving into the proposals. And first up is
15 sodium chlorite for the generation of chlorine
16 dioxide gas. And Scott's gotten his beard.

17 MR. RICE: Thank you.

18 This is material petition in 2015
19 initially. Petition for use as an antimicrobial,
20 pesticide, sanitizer, or disinfectant for fruits
21 and veggies.

22 Chlorine dioxide, or CDO gas, is used

1 in post-harvest handling for the direct treatment
2 of fruits, vegetables, and nuts during storage,
3 transportation, and food preparation applications
4 to reduce spoilage and pathogenic organisms.
5 Chlorine dioxide acts as a killing agent of
6 pathogenic organisms.

7 It is, the chlorine dioxide gas is
8 produced onsite at the handling facility by
9 impregnating zeolite with a sodium chlorite and
10 then activating the zeolite, which is then
11 treated with a solid or liquid acid such as
12 citric acid.

13 If liquid acid is used, as in the
14 product manufactured by the petition, a buffer is
15 used to control the formation and release of the
16 gas.

17 In organic production, chlorine
18 dioxide is currently allowed for use in liquid
19 solution in crop production as a preharvest
20 algaecide, disinfectant, and sanitizer, including
21 in irrigation systems, cleaning systems, in
22 organic livestock production for use in

1 disinfecting and sanitizing facilities and
2 equipment, and in organic handling for
3 disinfecting and sanitizing food contact
4 surfaces.

5 For these uses, the residual chlorine
6 levels in the water cannot exceed the maximum
7 residual disinfectant limit under the Safe Water
8 Drinking Act. This petition is seeking to extend
9 the use of chlorine dioxide in gaseous form for
10 antimicrobial treatment.

11 The proposed use is similar to
12 acidified sodium chlorite. That's already listed
13 at 605(b) for secondary direct antimicrobial food
14 treatment and indirect food contact, sanitizing.
15 That substance was petitioned and added as a
16 solution, whereas this would be used as a
17 fumigant gas for direct food contact.

18 The subcommittee initially favorably
19 viewed this. The petitioners claim that no post-
20 treatment water rinse is necessary, and concerns
21 regarding wastewater in other treatments were
22 somewhat addressed because of that lack of use of

1 the water.

2 Through the course of the review and
3 comments from the public, that claim didn't seem
4 quite as clear as we initially thought, the
5 comments about which I'll touch in a moment.

6 The subcommittee also initially saw
7 this as having a potential for reduced exposure
8 to those using chlorine dioxide as the substances
9 reacted, and its use takes place in an enclosed
10 space. However, the exposure at even lower
11 levels presents some concerns.

12 Had a number of comments on this both
13 in this round and in previous rounds. Several
14 commenters noted the material should be
15 petitioned or listed as chlorine dioxide gas with
16 an annotation restricting the form to generated
17 from sodium chlorite.

18 Commenters noted it was unclear how
19 other precursors and activators other than sodium
20 chlorite would be reviewed. I think it's
21 important to note that the initial petition was
22 submitted in this way. However, at the time,

1 there was a clarification from the program that
2 the subcommittee, that the subcommittee followed
3 it in making a determination since the material
4 would not be sold or distributed as a finished
5 product of chlorine dioxide gas, it be petitioned
6 as stated.

7 Comments from certifiers, material
8 review organizations, and others again noted that
9 for clarity and consistency in review, the
10 alternative language was preferable.

11 While the petitioner states the gas
12 can be used without a subsequent potable water
13 rinse, several comments noted the EPA requires
14 that for chlorine dioxide fruit and vegetable
15 treatment the label include a statement: "fruits
16 and vegetables treated with chlorine dioxide must
17 be blanched, cooked, or canned before consumption
18 or distribution in commerce." That was based on
19 a need to reduce residues below 3 parts per
20 million.

21 Several commenters pointed to the EPA
22 conditional registration as cause for concern

1 given that with such registration not all
2 essential environmental toxicity data is
3 available.

4 Some commenters noted the current
5 limited label use of the petitioner's product for
6 -- and I should say the only product that we're
7 aware of for potatoes in storage. There does not
8 appear to be a product in the market for which
9 the label use allows a wider application at this
10 time.

11 Commenters pointed also to
12 alternatives that are available. As in -- as we
13 see in organic operations, preventative practices
14 are the first line of defense and cornerstone of
15 both field and post-harvest practices. There is
16 a gaseous form for disinfectant for ozone gas
17 with peracetic acid, and as well as other
18 chlorine materials.

19 Two commenters attested to successful
20 results in non-organic facilities, but again
21 limited to use on potatoes.

22 We did not hear any comments from

1 organic processors or handlers to add this
2 material to their practices.

3 So I think while it appears this could
4 be an effective tool, the concerns over potential
5 impacts on human health and environment, the
6 present limited availability or label use of this
7 and availability of alternative materials and
8 practices, and the lack of necessity in food
9 safety compliance does not, you know, shifted
10 thoughts on this in terms of adding it to the
11 National List.

12 I know that there was, again, support
13 in the initial vote from the subcommittee. And
14 wanted to go through that to explain what our
15 thinking is at this point. Asa.

16 MR. BRADMAN: I just want to make a
17 few comments about this material as well.

18 I think in the general category of
19 chlorine compounds that there's a lot of -- boy,
20 I seem to be mumbling today -- that the whole
21 issue of chlorine compounds is challenging and
22 something that does need a broader review.

1 Bleach also is a harsh material.

2 I just want to kind of summarize,
3 though, some of the health effects that are
4 associated with chlorine dioxide. I actually
5 reviewed this material and bleach earlier this
6 year. And if we just look at, say, the NIOSH and
7 ATSDR documents, there's been some other
8 association of clinicians, environmental
9 occupational commissions. Exposure to chlorine
10 dioxide can produce irritation of the eyes, nose,
11 throat, cough, wheezing, bronchitis, pulmonary
12 edema, and chronic bronchitis and asthma.

13 Under the global harmonization system
14 for signaling materials it has a number of
15 signals, including it's an oxidizer. It's
16 corrosive. It's an acute poison. It's an
17 irritant and has aquatic toxicity. So there's --
18 it's also considered an asthmogen, as is bleach.
19 An asthmogen is basically a material that can
20 cause asthma as opposed to triggering an
21 asthmatic response in somebody who already has
22 it. So this is a quite harsh material.

1 But though I look forward to
2 discussion around this because of, you know, the
3 notion if using -- I mean, I have problems with
4 this material. I would vote this petition down.

5 But if there is, you know, if there's
6 ways of using it or other materials or, you know,
7 a whole range of materials needed for sanitizing,
8 then it could possibly reduce other exposures.
9 And I think that's where there are some
10 challenges and that's where we need to look at
11 the big picture. And perhaps other people on the
12 board can comment to that.

13 But this is a powerful material, as
14 are many of the chlorine compounds. And they're
15 harsh, and there's a tradeoff with the
16 environmental and human health effects and the
17 food safety issues.

18 One last thing I want to, point I want
19 to make related to the human health effects is
20 that there, I don't feel like there's been
21 adequate monitoring for chlorine compounds in
22 food processing environments. When I was

1 reviewing materials related to seafood
2 processing, poultry processing, I could find very
3 few studies just where somebody went into an
4 occupational environment and just measured, you
5 know, chlorine in the air, different forms of
6 chlorine and interviewed workers.

7 I know when we went into the Salinas
8 area, workers, particularly in processing
9 facilities, complained bitterly about exposures
10 to bleach. In fact, they were more concerned
11 about that in many cases than the more
12 conventional pesticides being used in the fields.

13 MS. DE LIMA: Emily.

14 MS. OAKLEY: Dave, if you want to go
15 first, I can go after you.

16 MR. MORTENSEN: Yeah. I guess I
17 would, I'd just echo Asa's concerns and the idea
18 that it's -- that field workers, and greenhouse
19 workers, and food processing folks in storage
20 facilities would be potentially exposed to, to a
21 gaseous form of this is really worrying to me.

22 So my reaction to this is that it is

1 not a good thing for us to be thinking we would
2 approve.

3 MS. DE LIMA: Emily.

4 MS. OAKLEY: I also think this really
5 speaks to the question of how petitioners come to
6 us and they express need for a material. And I
7 don't feel like we received popular comment at
8 all from industry and in support or in request of
9 this material.

10 So, weighing that with the concerns,
11 I also don't support this.

12 MS. DE LIMA: Harriet.

13 MS. BEHAR: Not only did it not
14 receive support, but the Organic Produce
15 Wholesalers Coalition spoke very strongly against
16 it. And I think they represent perhaps not every
17 distributor of organic produce, but they do
18 represent a significant portion of it.

19 I think, too, that we are looking at
20 sanitizers, and so if we vote this down it
21 doesn't mean that in that review we might find a
22 specific need for this or, you know, that there

1 could be a gap. And this is one of the reasons
2 why we have the sanitizer review on our work
3 agenda to look at these unique sanitizers and try
4 to understand better where they fit.

5 Because when we look at them in this
6 way we see the human health and the environmental
7 impact and all these things. And we see
8 alternatives and yet we -- and we don't see a
9 specific needs.

10 So I'm hoping that I'm going to vote
11 against this material and but keep my mind open
12 when we are doing the sanitizer review. And
13 include review of this material and materials
14 like this that are in gaseous form for possible
15 inclusion. And maybe we'll find a different one,
16 whatever.

17 But I'm sure that there are places
18 where this type of sanitizer might be unique.
19 But without that specific information or
20 clamoring from our organic community for the
21 material, and so I'm speaking very strongly
22 against it. I think it doesn't look too good, at

1 least for my vote.

2 MS. DE LIMA: Ashley.

3 MR. SWAFFAR: Yes. So, on this team
4 from the subcommittee unanimously suggesting to
5 list this material. And it sounds like several
6 on that subcommittee may have changed their mind.
7 And I would just encourage those members to
8 please tell us that for the public record and to
9 be critical, to state your opinion. I am not on
10 the subcommittee anymore.

11 MS. DE LIMA: Steve.

12 MR. ELA: I'll stick my neck out. So,
13 although for a chicken producer, if I stick my
14 neck out I don't want to --

15 MR. SWAFFAR: That's not humane,
16 Steve.

17 MR. ELA: Okay, fair enough.

18 This is one I've really wrestled with.
19 And I certainly voted for it in subcommittee. I
20 personally react to chlorine pretty strongly so I
21 have no love of it. But I also, since we run a
22 farm and a processing facility, that is our, our

1 go-to sanitizer of choice as a very small
2 facility.

3 Certainly as we look at packing lines
4 and fruit, and things that are not flat and
5 easily sanitizable, and with FSMA compliance
6 especially for very small processors that don't
7 have large budgets for equipment, the
8 attractiveness of a gas is strong, in the sense
9 of being able to shroud something, fumigate it.

10 You know, for example, we can shroud
11 our packing line on Saturday evening, fumigate.
12 Crews gone. Monday morning come back, get back
13 to work and have a kill step in that, in that
14 process. So that's very attractive without the
15 having to spray everything down and trying to get
16 in bearings and nooks and crannies.

17 So I honestly am leaning towards it
18 even though I totally agree with all the
19 comments, you know, from Asa and the others. I
20 have no love of chlorine materials. But that's
21 my -- I think it's another tool in the toolbox
22 that is different than the other chlorine

1 materials.

2 So I'm torn with how I'll vote but I
3 do want to put that 2 cents in as why I voted in
4 favor of it originally.

5 MS. DE LIMA: I voted in favor
6 originally but I'll be changing my vote.

7 MR. SCHWARTZ: I'm calling on myself
8 and then I'll call on them.

9 I'm changing my vote, you know, for
10 all the reasons that Scott summarized: the lack
11 of, lack of support in public comments, the
12 health concerns. There were some folks that
13 wrote in that I want to take their public comment
14 into consideration.

15 MS. ROMERO-BRIONES: So I voted to
16 keep it. I certainly empathize with all the
17 comments. I've spent a lot of time for the last
18 ten years or so working with various sanitizers
19 on the processed vegetable side, and there are so
20 few tears available, I think it's very dangerous
21 to start taking tools off until we've really
22 vetted that.

1 Most folks are aware that we can't use
2 caustic, we can't use heat, so the few tools that
3 are out there, to start taking those away, I
4 think that's, that's the challenge.

5 MS. DE LIMA: A-dae.

6 MS. ROMERO-BRIONES: So, I voted to,
7 I voted for it partly because it's used by one of
8 the only certified tribal operations, a potato
9 farmer in Arizona owned by the Maricopa Indian
10 Community. And they actually used this in their
11 processing line.

12 I do, I hear the concerns of Asa, so
13 I'm reconsidering my vote. But I originally
14 voted for it.

15 MS. DE LIMA: Scott.

16 MR. RICH: Just clarification on a
17 couple things. This is not a material that's
18 currently on the National List, so we would not
19 be removing something that is presently available
20 to an operation. And it may be -- and A-dae
21 might clarify for me if it's maybe the operation
22 is using it in the conventional side --

1 MS. ROMERO-BRIONES: Yes. Yes.

2 MR. RICH: -- and seen the success.

3 MS. ROMERO-BRIONES: Yes.

4 MR. RICH: So I just wanted to make
5 sure that was clear for everyone.

6 MS. ROMERO-BRIONES: Thank you. I
7 misspoke. Yes, thank you for your clarification.

8 MS. DE LIMA: Sue.

9 MS. BAIRD: This is a question. And
10 I appreciate everybody's input. It's been very
11 helpful to me.

12 I'm taken by Steve's comment that it
13 would help small processing, maybe on-farm
14 processing facilities. And small farms is where
15 my heart's at. I'm wondering if, if we voted to
16 add this to the list, perhaps based on Steve's
17 comment that he would do it in the evening and
18 then come back the next morning, gases would be
19 dissipated, maybe we could put that kind of a
20 time lapse annotation on it.

21 I know there are on some other
22 products or materials.

1 MS. DE LIMA: Tom.

2 MR. CHAPMAN: Just to answer the
3 question about how people voted, I was the absent
4 member. I was at camp with my daughter. So I'm
5 going to have to keep you guessing on that one.

6 MS. DE LIMA: Harriet.

7 MS. BEHAR: I just want to say again
8 that we will be doing this review of sanitizers.
9 And that might help us identify other gaseous
10 sanitizers that perhaps would be less problematic
11 than this one.

12 And so we put this one on. I just, I
13 think it's a little bit of a rush. Do we
14 absolutely need this right this minute? Or could
15 we wait a year and have some better information
16 available to us as far as the unique uses of this
17 and what other uses there could be? So, just
18 kind of a caution.

19 MS. DE LIMA: I have a question for
20 Steve. Put you on the spot.

21 So, what do you do currently?

22 MR. ELA: That's a hard one. I mean,

1 we're, we're really wrapped in a quandary around
2 that in our operation. I mean, it's chlorine.
3 It's a wash. But with FSMA and the requirement
4 for swabs and everything, I mean, really where
5 you're getting down to a whole different level of
6 sanitation than small growers used to do. It's a
7 new, it's a new thing.

8 And we have spent a lot of hours
9 scratching our heads of what the proper way to
10 approach this is. So, and I'm not saying we
11 would necessarily fumigate, but it puts in my
12 head, well, here's an option.

13 And I guess we keep as a committee, I
14 totally -- I mean, it's so funny because I'm
15 usually really conservative on these kind of
16 things and vote against them. But the fact this
17 intrigues me kind of worries me a little bit.

18 But I see us kind of continuously
19 mixing some of these post-harvest compounds
20 because of rod spectrum. I mean, for good
21 reasons. But at some point I think we do have to
22 offer growers a choice for post-harvest

1 sanitation, both of equipment and of the fruit.
2 And I'm not saying this is the right one for that
3 necessarily, but I think we do need to be aware
4 that there isn't some need out there.

5 We do lose, you know, processors,
6 people lose fruit to rot. We do have to sanitize
7 lines. FSMA is a whole different ballgame than
8 what it used to be, you know, where we're really
9 going for complete sterility from, you know, from
10 just good practices. And it's a challenge.

11 So I don't know if that answers your
12 question, but right now it's basically chlorine
13 and water for us.

14 MS. DE LIMA: Scott.

15 MR. RICH: Just a follow up for you,
16 Steve. Sorry to continue to put you on the spot.

17 Have you considered or explored the
18 idea of using ozone?

19 MR. ELA: We are. I mean, it's a work
20 in progress. I mean, that is, that is in the
21 back of my head as well, so. And that may be the
22 preferable way to go.

1 I guess it's one of those things that
2 it's got us flummoxed for a while. And we don't
3 have the capability. I mean, like many small
4 farms we don't have a food safety officer. You
5 know, my spouse is that.

6 But, you know, and it's really hard --
7 and I think this is not related to this compound
8 -- but it's really hard for small processors or
9 growers to get that information. I mean, we're
10 in touch, we're in close contact with CSU and the
11 folks there. And they're great. But they don't
12 actually have a lot of these answers either.

13 You know, the big processors that have
14 a Ph.D. on staff, it's a whole different story
15 because they have somebody that can vouch for
16 that. But for those of us that don't have a
17 background in microbiology -- and I think many
18 small growers are with that -- it's a challenge
19 to figure out how to meet these regulations with
20 due diligence. And, you know, none of us want a
21 food safety incident, we want to do it right.
22 But, you know, the information isn't readily

1 available.

2 MS. DE LIMA: Dave, then Tom, then
3 Rick.

4 MR. MORTENSEN: I guess just a thought
5 that, you know, farmer behavior in terms of
6 stewardship of practices is a distribution curve.
7 I think we have some super dooper careful folks
8 that are working with their staff, and we have
9 folks that are less careful. And when we're
10 talking about something like chlorine gas, it
11 just continues to concern me that it's not a
12 static farm community, it's a distribution of
13 behavior. Some pay more attention to some things
14 than others.

15 And this is a sort of use that's
16 unforgiving with respect to human exposure.

17 MS. DE LIMA: Tom.

18 MR. CHAPMAN: I just want to note that
19 the sanitizers work agenda item that was approved
20 by the program is limited to -- and I'm going to
21 read from it -- the goal of this initiative is to
22 develop questions to examine the essentiality of

1 these materials, and to build upon criteria to
2 evaluate substances on the Nation List per
3 Sections 205.600 of the U.S.C. regulations.

4 It's not a holistic review of all the
5 sanitizers. And I don't know if some of the
6 comments made about that work agenda item would
7 yield gaps or knowledge gaps of where the
8 sanitizer code could not provide some, some
9 assistance in the needs of organic producers.

10 So, if we, if that larger work agenda
11 item were needed it would need to be asked from
12 the program.

13 The other thing, now that I have my
14 opportunity to speak, of course I'm going to just
15 but in here that we are running late on the
16 Handling Subcommittee and we'll need to do Crops
17 at some point. At some point we will need to
18 wrap this conversation up and move to other
19 items.

20 MS. DE LIMA: Rick, go ahead.

21 DR. GREENWOOD: Just a quick comment.

22 I think most of you know there's about 900 major

1 food outbreaks a year in this country with 3,000
2 deaths. And one of the best ways to prevent them
3 is sanitation within a packing house or in the
4 field. And to actually sanitize things, gases
5 work very well because they can get into places
6 that liquids can't.

7 So I see this, again, as something
8 that's very useful in an era where there's a lot
9 of scrutiny. And I also get comments from
10 people, well, aren't organics more susceptible to
11 transmission of disease because of natural
12 products and things like that? And people
13 mention that.

14 So I think it's important to have
15 something that can be useful and really get into
16 the cracks and crevices of these places. So I'm
17 going to vote for it.

18 MS. DE LIMA: Harriet, make it quick
19 and then we'll go to vote.

20 MS. BEHAR: Yes. There was a lot of
21 public comment that the actual listing should be
22 chlorine dioxide gas instead of sodium chlorite.

1 Was there any discussion within the subcommittee
2 about possibly changing that? Because the actual
3 material is chlorine dioxide gas, not sodium
4 chlorite.

5 MS. DE LIMA: Scott, you want to take
6 that?

7 MR. RICH: Yeah. I think if we were
8 going to consider this I would want to have the -
9 - take into consideration that public commenters
10 have given to have a listing that is more
11 workable from a verification side. And if that
12 is significant enough that it needs to go back to
13 subcommittee, then I would prefer that than to
14 have a listing that is not as workable.

15 MS. DE LIMA: Jennie, can you comment
16 on that, or can the program?

17 DR. TUCKER: I'm sorry, can you repeat
18 the question?

19 MR. RICH: If we were to continue
20 voting on this would changing the listing to --
21 let me get my language up in front of me --
22 changing the listing to, as commenters have

1 preferred, chlorine dioxide gas with an
2 orientation generated from sodium chlorite. Is
3 that something that would need to come back to
4 subcommittee versus making that change here?

5 DR. MATHEWS: The change would consist
6 of the annotation? Just a point of clarification
7 there.

8 MR. RICH: It's not really an
9 annotation.

10 MR. CHAPMAN: Yeah, it's not.

11 MR. RICH: It's the material as it was
12 passed was the sodium chlorite for the generation
13 of chlorine dioxide gas. And I think there was
14 some comment about flip-flopping that kind of.

15 And I'm going to also ask for a third
16 alternative which is do we need to change it and
17 send it back, or can this also just be handled by
18 the program in the regulatory process here on
19 out, given the clarity of the current motion?

20 DR. MATHEWS: Certainly if it came
21 through in the board's recommendations, the
22 program would take those recommendations into

1 consideration if it got to the regulatory writing
2 phase.

3 MR. RICH: Thank you.

4 MS. DE LIMA: Really quick from Steve.

5 MR. ELA: I recall that you came on
6 the board with us, Joelle. I wish she was here
7 for this. But I remember her comments on the
8 whole chlorine issue of it's like the gums, every
9 chlorine product has a specific use and a
10 specific place and is, you know, a specific
11 thing.

12 And so her comment really in reviewing
13 all the chlorine products was it's so variable,
14 depending on the manufacturer and the situation,
15 that she was really hesitant to say that any of
16 us or anybody could adequately say limiting the
17 toolbox, because she really felt, like the gums,
18 each one has a specific use.

19 So, I just want to echo her, her
20 thoughts before she went off the board.

21 MS. DE LIMA: We have to move to a
22 vote. I'm sorry, Emily.

1 Tom.

2 MR. CHAPMAN: Okay. So we have two
3 votes here. One is a classification motion. So
4 this is a determination --

5 MR. RICH: Point of order.

6 MR. CHAPMAN: Yes. Sorry.

7 MR. RICH: That clarification --- the
8 classification has already been completed.

9 MR. CHAPMAN: Oh yes. That would also
10 explain why the vote numbers are different.

11 Okay, so this item does not need to be
12 classified. It's already been classified by a
13 previous NOSB who classified this material as
14 non-agricultural synthetic in April of 2016.

15 So the motion here is just the listing
16 motion, the motion to add sodium chlorite for the
17 generation of chlorine dioxide gas at 205.605(b).
18 The motion was made by Scott and seconded by
19 Lisa.

20 A yes vote is to recommend this
21 material for listing. So, different from the
22 sunset. A yes vote is to recommend listing. A

1 no vote is to reject this petition, not recommend
2 it for listing. The voting will start with Dave.

3 MR. MORTENSEN: No.

4 MR. ELA: Yes.

5 MR. BRADMAN: No.

6 DR. GREENWOOD: Yes.

7 MS. DE LIMA: No.

8 MR. SCHWARTZ: Yes.

9 MS. ROMERO-BRIONES: No.

10 MS. OAKLEY: No.

11 MS. BAIRD: Yes.

12 MR. BUIE: No.

13 MS. SWAFFAR: Yes.

14 MR. RICH: No.

15 MS. BEHAR: No.

16 DR. SEITZ: No.

17 MR. CHAPMAN: Chair votes yes.

18 MR. RICH: That's 6 yes, 9 no, 0

19 absent.

20 MR. CHAPMAN: Six yes, 9 no, 0 absent.

21 The motion fails.

22 MS. DE LIMA: All right. Next we have

1 silver dihydrogen citrate. Tom.

2 MR. CHAPMAN: All right. Silver
3 dihydrogen citrate is a petition that was brought
4 forward to the NOSB, brought forward by Pure
5 Bioscience, it's petitioned as a antimicrobial
6 processing aid for poultry carcasses, and fruit
7 and vegetables, excluding citrus for grapes --
8 citrus and grapes for wine making, and for use as
9 a disinfectant or sanitizer for food contact
10 surfaces and food processing equipment.

11 As petitioned it was petitioned to be
12 listed on 205.605(b) as a synthetic non-
13 agricultural substance allowed in processed
14 products labeled as organic or made with
15 organics.

16 The petition received in January of
17 2017; amended in August of '17; and again an
18 addenda was submitted in June of 2018.

19 Technical review was requested and
20 found sufficient by the subcommittee. It was
21 found sufficient in May of 2018.

22 The subcommittee also recommended

1 amending the petition to add an annotation that
2 read "limited to particle size greater than 300
3 nanometers."

4 Based on information provided, SDC
5 appeared to be a low risk to the environment and
6 human health. The subcommittee found that it
7 appeared to be a low risk to the environment and
8 human health, both in use and in disposal.
9 Alternative materials, natural and synthetic, are
10 available. However, those substances have
11 limited application and/or utilize a similar
12 oxidated mode of action.

13 There was a growing concern about the
14 development of bacterial resistance by oxidated
15 bacterial agents. And I do want to note that
16 those oxidated agents were efficacious, are also
17 used in hospitals and medical applications.

18 This is the first time that the NOSB
19 has brought this petition forward on our polished
20 agenda, although we have received comment on it
21 in previous meetings.

22 The subcommittee, again, had interest

1 in this material given its alternative mode of
2 action, limited toxicity in application, and a
3 thought that we could mitigate the nanomaterial
4 concern.

5 We received a sizable amount of public
6 comment on this material at this meeting and at
7 some past meetings, some encouraging that we pass
8 this item without the limitation. Some
9 encouraging that we send it back to subcommittee
10 for further review and consideration. And some
11 asking that we fail this item.

12 We did not receive any support for
13 listing it the way we had proposed to list it.

14 And we had questions raised and really
15 I'm going to summarize them briefly in, I guess,
16 four main areas.

17 So, the first area was the use of
18 nanotechnology. There's a debate around whether
19 this material is a nanomaterial. I want to note
20 that in the fall of 2010 the NOSB unanimously
21 voted to prohibit engineered nanomaterials of
22 sizes 1 to 300 nanometers in organic production

1 and handling.

2 And that the NOP responded to the NOSB
3 recommendation in a policy memorandum dated March
4 of 2015, letting it be noted that nanomaterials
5 are generally the size of 1 to 100 nanometers and
6 that to be used in organic production they would
7 need to be petitioned to the National List. To
8 address the public concerns and to stay
9 consistent with previous NOSB action, the NOSB
10 did recommend limiting the use of this item to
11 particle sizes less than 300 nanometers. But we
12 failed to place the minimum size on that, the 1
13 to 300 nanometer range.

14 The petition also noted that this was
15 ionic silver and, therefore, was less than the
16 size of 1 nanometer, and in their arguments
17 concluded that it was not a nanomaterial because
18 it was not specifically engineered for that size
19 and was below the lower threshold.

20 Another area of concern was the use of
21 an antimicrobial in food applications that was
22 also used in medical applications.

1 There were some concerns around
2 studies that were showing a level of resistance
3 to silver compounds, bacterial resistance to
4 silver compounds, and that their usage should be
5 reserved for the medical environment, and that
6 further usage of silver in organic applications
7 could potentially speed up the development of
8 microbial resistance to silver.

9 The third area of concern was around
10 our assessment on the toxicity of this substance,
11 particular around environmental toxicity of
12 silver and the water effluence. The petition,
13 the petitioner, and the subcommittee noted as, as
14 well as the technical review, that at the low
15 levels of application the results of the spent
16 water being much below background levels of
17 silver in the environment and in waterways.

18 However, we also received comments
19 from the public directing our concern to toxicity
20 of silver in general, as well as the use of this
21 materials and restrictions of the use of this
22 material already from the FDA or EPA, and

1 concerns of notifying municipal water sources,
2 and how that would be handled if it was used in
3 field applications or in applications of which
4 the water did not result in being disposed of
5 through a municipal setting.

6 Another area was around the necessity
7 of another sanitizing substance and the fact that
8 there is the presence of other sanitizers, and
9 the general request for a holistic review of
10 sanitizers.

11 We did hear support from industry. We
12 heard support from a numerous number of
13 antimicrobial distributors; some food safety
14 scientists, including a former USDA
15 undersecretary for food safety; and then also
16 from industry, particularly to a --- one being a
17 large organic leafy green processor located in
18 California who uses this on their conventional
19 leafy greens and noted the risks to food borne
20 pathogens in that industry and the need for
21 effective sanitizing substances to mitigate those
22 concerns.

1 Those were the major areas. There's
2 definitely other concerns as well, including the
3 residuals on food. And the other one I want to
4 note is the use of sodium lauryl sulfate, and
5 whether or not that material needs to be reviewed
6 or excluded, and if the way it was petitioned to
7 us in usage was consistent with the way it was
8 noted in the patent for this material.

9 All summed in, I do want to open this
10 up for public discussion here. But also note
11 that no matter what our opinion here is, we
12 probably deserve to send this back for the sense
13 that we did not accurately describe the
14 nanomaterial issues in our summation. And it
15 definitely needs some revision to take into
16 account some of these concerns that were raised
17 here.

18 And so we will be recommending, or I
19 will be making a motion at some point to refer
20 this back to the subcommittee for further review.
21 But would also like to open it up here for some
22 kind of brief comments on the use of this

1 material.

2 MS. DE LIMA: Harriet.

3 MS. BEHAR: there was also one
4 commenter Richard Theuer who discussed the use of
5 sodium lauryl sulfate. And will that be reviewed
6 then in subcommittee as well?

7 MR. CHAPMAN: Yeah, that was my -- on
8 the more minor concerns, or not minor by any
9 means, but the other concerns of note that not
10 all the people noted was the residuals in food,
11 on food services, as well as sodium lauryl
12 sulfate and what source is used. What's the
13 reason behind the presence of that material?

14 MS. DE LIMA: Dave.

15 MR. MORTENSEN: You know, I don't know
16 if it goes back to committee or not, but I would
17 just say that I have some concerns about this
18 that, you know, that were raised in some of the
19 public comment and just some concerns that I had
20 when I initially read the proposal.

21 I think there's pretty ample evidence
22 that the silver, you know, when in solution will

1 likely precipitate to form larger size molecules
2 that definitely approach, you know, the sort of
3 size frames that we're concerned about in the
4 legislation, Tom, that you, that you were citing.

5 I also have concerns about introducing
6 silver into the water stream in the way that this
7 practice would. And I thought that the
8 questioning that Steve Ela was pursuing with the
9 speaker yesterday revealed that there's, in my
10 opinion, not a lot of thought's been given to
11 what is the fate of the silver in the wastewater,
12 and particularly under conditions on the
13 farmstead scale that would be maybe moderate size
14 to smaller.

15 Those are my two big concerns.

16 MS. DE LIMA: Emily.

17 MS. OAKLEY: I echo that.

18 MS. DE LIMA: Tom, I don't see any
19 other discussion.

20 MR. CHAPMAN: Yeah. I do want to note
21 that the nano subject is, it's a bit, it's a bit
22 complex. I'm going to read the working

1 definition that the NOSB had proposed. Although,
2 if you read that proposal, it also notes the need
3 for further refinement and understanding of
4 nanotechnology.

5 But the working definition that the
6 NOSB had tried to put in place was:

7 Engineered nanomaterials: substances
8 deliberately designed, engineered, and produced
9 by human activity to be in the nanoscale range,
10 approximately 1 to 300 nanometers because of very
11 specific properties or compositions. For
12 example, shape, surface properties or chemistry
13 that result only in that nanoscale. Incidental
14 particles in the nanoscale range created during
15 traditional food processing such a
16 homogenization, milling, churning, freezing, and
17 naturally occurring particles in the nanoscale
18 range are not to be included in this definition.
19 All nanomaterials, without exception, containing
20 capping agents and synthetic components are
21 intended to be included in this definition.

22 It's not clear to me if the only

1 concern is it reforming -- and I mean there might
2 be other concerns -- but if the only concern was
3 that reforming nanoparticles in solution, I don't
4 know if that meets this definition that was put
5 forward by previous NOSBs.

6 MR. MORTENSEN: Yes. Not by the words
7 that I was hearing you read. But certainly I
8 think the concern is nanoparticles or just
9 precipitated metal ions that we're introducing
10 into cells and into the water stream just really
11 concerns me.

12 And during one of the public
13 commenters' presentations about this where the
14 person was advocating for this product I asked
15 several questions about the fate in water, and
16 the answers were just nonsensical. That, you
17 know, silver would be, the concentration would be
18 below the background level in the waste stream.
19 I mean this, that just doesn't make sense. Or
20 releasing silver ions into the water stream it's
21 certainly going to be elevated. And I really am
22 concerned about the state of that, you know.

1 And it's my, in my thinking this is
2 not consistent with organic systems or organic
3 management that we would be adding metal-based
4 compounds to our management scheme.

5 MR. CHAPMAN: So it's my understanding
6 that that fate was from EPA and FDA's studies
7 about background levels of contamination and not
8 that you're releasing something in a lower level,
9 lower than the background level that's already
10 there. Do you have, like, studies or sources of
11 information that you could refer to us about the
12 background contaminations of silver to support?

13 MR. MORTENSEN: Yeah, some has been
14 exchanged through the course of all this
15 discussion over the last month or two. I'd be
16 happy to share it.

17 But I mean, just on the face of it,
18 for someone to say that we're going to be
19 introducing a waste stream of water where the
20 product that's being used contains silver, and
21 that that waste stream won't have an elevated
22 silver level, that just can't make sense to me.

1 MR. CHAPMAN: I don't think that's
2 what's being said.

3 MR. MORTENSEN: Well, that was said
4 because I asked the speaker specifically on the
5 phone when we had the public comments and he
6 said, yes, it would be below the levels, the
7 levels that the water was before the waste stream
8 had been introduced.

9 MR. CHAPMAN: So I think it, I think
10 it depends on what -- how you're evaluating this
11 at. If you're looking at water that did not
12 contain silver being put into environmental water
13 that's generally available out there versus water
14 that had this material going to environmental
15 places with some sort of silver background level,
16 yes, it clearly is going to increase the amount
17 of silver in the application potentially.

18 MR. MORTENSEN: Yeah.

19 MR. CHAPMAN: Because there's more
20 silver on an absolute level going in there.
21 However, if the concentration of that water going
22 into the environmental water is at a lower

1 concentration level than what is already there,
2 it would be diluting the environmental background
3 levels.

4 MR. MORTENSEN: If the waste stream
5 going into the rest of the water body is?

6 MR. CHAPMAN: Had less silver than --

7 MR. MORTENSEN: Has a lower
8 concentration?

9 MR. CHAPMAN: -- the silver that was
10 already naturally present.

11 MR. MORTENSEN: If that was the case,
12 you would be current, Tom, and I just can't
13 imagine that that's the case.

14 MR. CHAPMAN: Okay, but that was the
15 finding of the EPA and the FDA. So I'd be
16 interested in seeing the scientific research that
17 refuted that statement --

18 MR. MORTENSEN: Okay.

19 MR. CHAPMAN: -- if you have it.

20 MR. MORTENSEN: Does that make sense
21 to you? I mean, we could -- I'll look for some
22 data on that. But, I mean, I think we also have

1 to use some common sense here about introducing a
2 waste stream that's high in concentration of
3 something and into a surface body of water, into
4 a septic tank that has a leach field with
5 groundwater underlying it that we would think
6 that the silver concentration would be lower
7 after we introduced the waste stream that's high
8 in silver. I just can't see how that could be.
9 Unless we're at, like, you know, unless it's a
10 very badly contaminated source of water or site.

11 MR. CHAPMAN: Yeah. I mean there's,
12 I think I can find a couple issues there.
13 There's the issue around the waste streams and
14 which applicable waste stream we're looking at.
15 Are we looking at a septic system versus a
16 municipal system?

17 But the dilution issue is a question
18 of math, it's not really a question of anything
19 else. It's the math of the dilution levels and
20 whether or not the effluent has a lower level of
21 silver than the water it's being mixed into.

22 MR. MORTENSEN: Yeah, I know it's

1 math. I just would say that it seems so
2 improbable that I can't imagine that being the
3 outcome. So I'll line it up.

4 MS. DE LIMA: Emily.

5 MS. OAKLEY: Just listening to you
6 both, I mean I think there are two issues here
7 with this use: one when it's used in the place
8 where the water will divert to a municipal
9 setting versus in cases where it will divert on
10 farm, in ponds, in septic systems.

11 And so I think we should analyze this
12 material based on the knowledge that there will
13 be times in which it is filtered through a
14 municipal system, and times in which it will not
15 be.

16 MR. CHAPMAN: Definitely. I agree.

17 MS. DE LIMA: Asa.

18 MR. BRADMAN: I just want to say I
19 thought that Steve's questioning yesterday and
20 the concerns that you raised about the septic
21 systems and on your own farm were really kind of
22 revealing to me. And I know that it helped kind

1 of guide my thinking about this material.

2 MR. CHAPMAN: And if I could just
3 note, that, that was a discussion -- Steve's on
4 the subcommittee with us -- this was new news
5 that we received at this meeting, which is why we
6 feel it needs to go back to the subcommittee -- I
7 feel it needs to go back to the subcommittee for
8 further review because that was not an area that
9 we had considered when we were looking at this.
10 And it wasn't until we received the public
11 comment, the wonderful public comment from the
12 Organic Wholesalers Produce Group -- I just
13 butchered their name -- about concerns on this
14 substance.

15 MS. DE LIMA: Emily.

16 MS. OAKLEY: Is it time to make a
17 motion to send it back to subcommittee?

18 MR. CHAPMAN: Yeah, probably.

19 Okay. So, I will, as the lead on this
20 material, take the lead on making a motion to
21 refer back to the handling subcommittee for
22 further review of the petition on silver

1 dihydrogen citrate.

2 MS. BEHAR: I'll second.

3 MR. CHAPMAN: And I have a second from
4 Harriet. So I have a motion and a second. And
5 we will lead to voting. The voting will start
6 with Steve.

7 A yes vote is to refer back to the
8 subcommittee. A no vote is to fail. And this
9 only requires a simple majority.

10 Steve.

11 MR. ELA: Yes.

12 DR. TUCKER: Yes.

13 DR. GREENWOOD: Yes.

14 MR. SCHWARTZ: Yes.

15 MS. ROMERO-BRIONES: Yes.

16 MS. DE LIMA: Yes.

17 MR. BRADMAN: Yes.

18 MR. MORTENSEN: Yes.

19 DR. SEITZ: Yes.

20 MS. BEHAR: Yes.

21 MR. RICH: Yes.

22 MS. SWAFFAR: Yes.

1 MR. BUIE: Yes.

2 MS. BAIRD: Yes.

3 MS. OAKLEY: Yes.

4 DR. MATHEWS: Yes.

5 MR. PATTILLO: Yes.

6 MR. CHAPMAN: Chair votes yes.

7 MR. RICH: It's 15 yes, 0 noes, 0

8 absent.

9 MR. CHAPMAN: The motion passes. This
10 is referred back to the Handling Subcommittee.

11 Lisa.

12 MS. DE LIMA: Next up is japones
13 peppers. A-dae.

14 MS. ROMERO-BRIONES: So japones
15 peppers is a small pointed chile, very small, 2
16 inches. It's a similar appearance to de arbol.

17 It was petitioned by a producer of
18 chile hot sauce. There were several -- this had
19 been on our docket for quite a while because we,
20 we were going back and forth with the petitioner
21 with several questions about alternatives to the
22 japones pepper.

1 A TR was not requested for this
2 because this was --- the real, the only question
3 that was really left to be answered was whether
4 there was an organic supplier of japones peppers.
5 The petitioner said that there wasn't enough
6 organic quantity to fulfill their need. And
7 there wasn't a suitable alternative because of
8 the units that make this pepper hot.

9 We had several commenters comment and
10 really focus on the 606 category because really
11 the question is about supply. And so the TR
12 doesn't answer that so we're kind of back to our
13 devices to figure out whether this can be
14 supplied organically.

15 Several board members did mention that
16 there is a possibility that organic suppliers can
17 be contracted to grow this pepper. All
18 commenters suggested not listing it.

19 MS. DE LIMA: Discussion, starting
20 with Emily.

21 MS. OAKLEY: Yes. I'm one of those
22 board members that thought this is definitely

1 something that can be grown domestically.

2 And to Tom's point as to whether or
3 not it can be processed in the way that's needed,
4 I mean there are USDA value added producer grants
5 that people can apply for. I know that may not
6 satisfy the situation, but I feel that the
7 threshold for a product like this, especially on
8 that is so easily grown domestically, should be
9 very high.

10 And I think that this is a unique
11 category. I understand many of the products that
12 are on 606, especially from historical reference,
13 but I think adding materials especially in such a
14 particular use needs a lot of scrutiny.

15 I have more thoughts but I'll share
16 them after others do.

17 MS. DE LIMA: Tom.

18 MR. CHAPMAN: Yes. On this one, I
19 mean, I don't think the petitioner did the due
20 diligence for me to support the listing of this
21 material. I have seen some other items in
22 response to our sunset petitions that show the

1 due diligence to prove to me that a product
2 cannot be sourced organically.

3 I do, I guess, want to emphasize,
4 though, that sourcing small agricultural products
5 is a lot more complex than finding a farmer or
6 finding a farmer who's willing to get a small
7 producer grant, I mean just to get qualified to
8 produce a safe food product.

9 You know, you'd need to get GFSI
10 certified. You'd need to get compliant with
11 FSMA. You would need to be able to
12 scientifically back up that you can make a ready
13 to eat statement on that. You would need a PCQI
14 on site. You'd need a HACCP plan for critical
15 control points. You'd need a foreign material
16 program, potentially a five log, a validated five
17 log production program. And all those things
18 cost money and are hard to get.

19 On top of all that you'd need to be
20 able to work with someone who's out there, a
21 small producer who is trying to get their product
22 out in the marketplace and sell it and will not

1 know the quantity of product they need.

2 So, I have a question whether that
3 small farmer would be willing to produce 5,000
4 pounds when they would potentially only be able
5 to sell 5 pounds, depending on the market demand
6 for this material. And if that wasn't there,
7 then the manufacturer of this wouldn't be able to
8 go out and sell it. And so there's this chicken
9 and egg when you start launching new products.

10 So, is this available in organic and
11 is there a market for the product I'm trying to
12 put it in?

13 So, 606 is valuable and there's a lot
14 of use for it but there is also a burden of proof
15 to show that you need to go through those steps.
16 And I wasn't fully satisfied with them going
17 through those steps. There is a lot of
18 processors of pepper products out there, some
19 organic, and I would have liked to have seen this
20 petitioner, you know, getting letters from those
21 folks saying this was not available. Rather I
22 saw stuff like an Amazon search.

1 And I understand that that's, you
2 know, I'm looking for maybe a sophisticated level
3 of sourcing. It is what I do for a living. But
4 I just wasn't satisfied with the amount of
5 sourcing that happened here to try to find an
6 organic version of this, so I won't be supporting
7 this.

8 MS. DE LIMA: Emily.

9 MS. OAKLEY: Yeah, I want to say that
10 I went back and looked at all of the posted NOP
11 materials about this material and thought that
12 the search for Amazon is not sufficient. I don't
13 think that this petition is adequate. And I
14 think if you go back and look at it that, again,
15 the threshold for these materials should be high.
16 I think something like locust bean gum is used by
17 many people.

18 And I'm not saying that this material
19 wouldn't be used by many people if it were added,
20 but the USDA seal is a very important seal. And
21 we also have to protect it. And that means doing
22 due diligence when something is added. They can

1 live with the need, with organic category until
2 they do more diligence to show that this really
3 isn't possible.

4 MS. DE LIMA: Ashley and then Scott.

5 MS. SWAFFAR: Just want to thank Tom
6 for a thorough explanation of why a whole lot of
7 people in this room have a job with food safety.
8 But I do have a question.

9 Did the petitioners say how many
10 pounds of processed product that they actually
11 would be needing? Or was it that incomplete?

12 MS. ROMERO-BRIONES: So I want to say
13 no, they didn't give us an exact quantity. I
14 think their references say things like there's
15 not sufficient quantity. And when we asked more
16 specific questions, the petitioner responded with
17 simple one-sentence answers in the letters.

18 MS. DE LIMA: Scott.

19 MR. RICH: Yeah. I appreciated Tom's
20 detail there to help everybody understand. And
21 just to reiterate, we gave the petitioner an
22 opportunity to come back to us with some of the

1 questions that we had. And it was very
2 unenthusiastic and not -- didn't, didn't appear
3 that there was a whole lot of effort.

4 And then we did not hear from them in
5 the public comment process.

6 MS. DE LIMA: Dan.

7 DR. SEITZ: My comment's just a little
8 more general. Given the change in how we handle
9 sunsets now, I think there should always be a
10 high threshold for approving a new substance just
11 because it's that much harder to remove the
12 substance in a subsequent vote.

13 MS. DE LIMA: I just want to add that
14 I voted in favor of adding it but I'm going to
15 change that vote to a no. And after going
16 through public comment and seeing what some other
17 petitioners of 606 items came forward with, but
18 yeah, this is insufficient on their part.

19 All right, Tom.

20 MR. CHAPMAN: All right. So this time
21 we do have the two motions. So the first motion
22 is just the classification motion. It's a motion

1 to classify japones peppers as agricultural. The
2 motion was made by Lisa and seconded by A-dae.

3 A yes vote is to declare this material
4 agricultural. A no vote is to make it something
5 else. The voting will start with Asa.

6 MR. BRADMAN: Yes, it is agricultural.

7 DR. GREENWOOD: Yes.

8 MS. DE LIMA: Yes.

9 MR. SCHWARTZ: Yes.

10 MS. ROMERO-BRIONES: Yes.

11 MS. OAKLEY: Yes.

12 MS. BAIRD: Yes.

13 MR. BUIE: Yes.

14 MS. SWAFFAR: Yes.

15 MR. RICH: Yes.

16 MS. BEHAR: Yes.

17 DR. SEITZ: Yes.

18 MR. MORTENSEN: Yes.

19 MR. ELA: Yes.

20 MR. CHAPMAN: Chair votes yes. That's

21 15 yes, 0 no, 0 absent.

22 All right. The next motion is a

1 listing motion. This is a motion to add japones
2 peppers to 205.606. The motion was made by Lisa
3 and seconded by Steve.

4 A yes vote is to recommend this
5 material for listing. A no vote is to not
6 recommend this material for listing. The voting
7 will start with Rick.

8 DR. GREENWOOD: No.

9 MS. DE LIMA: No.

10 MR. SCHWARTZ: No.

11 MS. ROMERO-BRIONES: No.

12 MS. OAKLEY: No.

13 MS. BAIRD: No. I actually do grow
14 these. They're pretty cool to grow.

15 MR. BUIE: No.

16 MS. SWAFFAR: No.

17 MR. RICH: No.

18 MS. BEHAR: No.

19 DR. SEITZ: No.

20 MR. MORTENSEN: No.

21 MR. ELA: No.

22 MR. BRADMAN: No.

1 MR. CHAPMAN: Chair votes no.

2 MR. RICH: That's fif -- excuse me, 0
3 yes, 15 no, 0 absent.

4 MR. CHAPMAN: Motion fails.

5 Lisa.

6 MS. DE LIMA: Next up, Ethiopian
7 peppers. A-dae.

8 MS. ROMERO-BRIONES: So this was
9 petitioned by the same petitioner of japonese
10 peppers. The conversations were very similar.

11 Ethiopian pepper differs from japonese
12 peppers because it is grown on a tree. So it's
13 much harder to contract for those because it's a
14 tree; it takes longer to grow.

15 So, the tree grows in zones in Africa.
16 We had several commenters suggest not listing
17 this. And they honed in on the same issues that
18 we discussed in the subcommittee, which is one of
19 the statements made in the petition was that it
20 was by nature de facto organic. And through that
21 statement some of the subcommittee were
22 questioning why it's not certified organic or

1 petitioned to be certified organic under the wild
2 crop standard.

3 When posed to, when this question was
4 posed to the petitioner, the petitioner responded.
5 The petitioner again just reiterated that it's de
6 facto organic. So the subcommittee discussion
7 around that issue was whether they understood
8 what that meant.

9 Or and then one commenter did actually
10 say that the Handling Subcommittee should
11 identify the methods by which it was grown.

12 And so part of the discussion whether
13 that was the Handling Subcommittee's
14 responsibility or the petitioner's.

15 MS. DE LIMA: Emily.

16 MS. OAKLEY: I share a lot of the
17 comments that I said earlier. Although I note
18 that this is a very different product. And what
19 that means to organic farming was actually
20 international agriculture. And I still do that
21 in my off season.

22 And this is a very different type of

1 pepper and it's not something I could grow. And
2 I understand that it is difficult to work with
3 smaller scale producers to get things wild crop
4 certified in terms of costs and organization of
5 farmer groups. Nevertheless, I don't see that
6 they need any efforts to do that, or contact
7 anyone about doing that, or finding out if there
8 was a supply to that regard.

9 So I would like to see them go through
10 that due diligence for this product as well.

11 MS. DE LIMA: Tom.

12 MR. CHAPMAN: Yeah, I mean I had
13 similar concerns on this petition like I did on
14 the last one. I think it would be a lower bar to
15 prove that this was not available. But then
16 again I still don't think that that occurred.
17 And so without that being present in the petition
18 and public comment I'm not convinced that this is
19 an item we should list.

20 I'm also not particularly a fan of
21 hearing that it's de facto organic. I like
22 living in the U.S. where we have the term

1 definitely rigorously defined and enforced under
2 the National Organic Program. And I also like
3 living in the state of California where when I
4 used to go the farmer's market and someone who
5 wasn't certified organic would tell me, Eh, it's
6 basically the same thing but now I can put a CDFA
7 agent on them, because that is not the case in my
8 opinion.

9 So absent that and the due diligence
10 to truly prove that this item is not available in
11 an organic form, I can't support it at this time.

12 MS. DE LIMA: Steve.

13 MR. ELA: I tend to agree with that.
14 I guess to add things to the list I think it's
15 more than submitting a petition and giving one
16 word answers. I mean, public comment, I mean,
17 the petition should comment. They should, you
18 know, probably not necessarily appear, but this
19 was pretty poorly supported. And it's pretty
20 clearly for one product at this point.

21 And I'm just hesitant. I mean, we
22 don't certify products but we're, you know, we're

1 being asked to certify a pepper for a product
2 versus a water use. So it, I mean, even though
3 the criteria are the same, and if the petitioner
4 had really come in and stated that said they
5 could wild craft it, or this was critical to
6 their business, or anything, I mean, I think
7 there are alternatives. And made with organic is
8 one. Another -- it's just hard to say it's
9 essential.

10 MS. DE LIMA: Tom.

11 MR. CHAPMAN: I'm going to vote this
12 down. I guess I will say, you know, there are
13 small processors out there like there are small
14 farmers that have various levels of
15 sophistication. And, you know, I'm making an
16 assumption from the responses and the
17 communication we got from these people and the
18 fact that I haven't seen a wide distribution of
19 their products around that they're probably a
20 fairly small producer that's focusing on just
21 getting market share and potentially trying to
22 make a product that might have some cultural or

1 ethnic significance to them or, you know, a
2 passed down recipe to differentiate themselves.

3 And there's a minimum bar and I don't
4 think we -- we did not hit that here.

5 MS. DE LIMA: Emily. And then we're
6 going to wrap it up.

7 MS. OAKLEY: I think that's a really
8 important point, Tom, about the size of this
9 producer. And I did consider that. But I agree
10 with you, there is still a minimum bar, and that
11 needs to be met. And it wasn't here, in my view.

12 MS. DE LIMA: All right, we're going
13 to move to a vote.

14 MR. CHAPMAN: All right. So, we have
15 two motions here again. A motion to classify.
16 We have a second to the motion to classify
17 Ethiopian peppers as agricultural.

18 The motion was made by Lisa and
19 seconded by A-dae. A yes vote is to say -- is to
20 declare this is agricultural. And a no vote is
21 to make no declaration. The voting will start
22 with Lisa.

1 MS. DE LIMA: Yes.

2 MR. SCHWARTZ: Yes.

3 MS. ROMERO-BRIONES: Yes.

4 MS. OAKLEY: Yes.

5 MS. BAIRD: Yes.

6 MR. BUIE: Yes.

7 MS. SWAFFAR: Yes.

8 MR. RICH: Yes.

9 MS. BEHAR: Yes.

10 DR. SEITZ: Yes.

11 MR. MORTENSEN: Yes.

12 MR. ELA: Yes.

13 MR. BRADMAN: Yes.

14 DR. GREENWOOD: Yes.

15 MR. CHAPMAN: Chair votes yes.

16 MR. RICH: That's 15 yes, 0 no, 0

17 absents.

18 MR. CHAPMAN: The motion passes.

19 The next motion is to add Ethiopian
20 peppers to 205.606. The motion was made by Lisa
21 and seconded by A-dae.

22 A yes vote is to recommend this item

1 be listed. A no vote is to not make that
2 recommendation. And the voting will start with
3 Eric.

4 MR. SCHWARTZ: No.

5 MS. ROMERO-BRIONES: No.

6 MS. OAKLEY: No.

7 MS. BAIRD: No.

8 MR. BUIE: No.

9 MS. SWAFFAR: No.

10 MR. RICH: No.

11 MS. BEHAR: No.

12 DR. SEITZ: No.

13 MR. MORTENSEN: No.

14 MR. ELA: No.

15 MR. BRADMAN: No.

16 DR. GREENWOOD: No.

17 MS. DE LIMA: No.

18 MR. CHAPMAN: Chair votes no.

19 MR. RICH: That's 0 yes, 15 no, 0

20 absent.

21 MR. CHAPMAN: The motion fails.

22 Lisa.

1 MS. DE LIMA: Next up, tamarind seed
2 gum. Steve.

3 MR. ELA: I'm going to be an expert in
4 gums by the end of this whether I want to be or
5 not.

6 But tamarind seed gum is being
7 petitioned as a non-organic agricultural
8 ingredient allowed in processed products labeled
9 as organic. It's a water soluble, high molecular
10 weight polysaccharide. And the petition claims
11 it has uses beyond what our current slate of gums
12 has.

13 One thing they say is that tamarind
14 seed gum imparts a viscosity similar to that of
15 starch, but it's viscosity does not deteriorate
16 in the presence of acids, bases, salts, and heat
17 like starch does.

18 And while they note that other
19 hydrocolloids may be used in products, they have
20 different textures and mouth feels, very similar
21 to what we heard about all the other gums, as
22 each one has a special, special use.

1 Included in the write-up on it is a
2 chart showing the comparisons between the various
3 gums. And while we can't project that, it is in
4 the meeting materials.

5 One of the claims in terms of organic
6 supply is that they said they have checked out
7 various tamarind powder and the various tamarind
8 fruit products but the tamarind seeds are not
9 available in sufficient supply to then go through
10 the processing process to make the tamarind seed
11 gum.

12 And they also note that many of the
13 tamarind trees are wild, kind of similar to the
14 previous petition, but there's not a sufficient
15 system in place to certify those.

16 So I think in this petition it really
17 comes down to the question of is this a unique
18 gum? Does it give properties to the National
19 List that other gums do not?

20 And then, also, in terms of the supply
21 chain, the petitioner is basically just saying
22 that small farmers collect the seeds, and the

1 preparation from the seed is completed in one
2 location. But their research for this petition
3 through the Organic Agricultural Certification
4 Program in Thailand they were unable to find
5 organic certified tamarind seeds.

6 And on the NOP organic integrity
7 database there is no source of organic tamarind
8 seed gum or tamarind kernel powder. And so it
9 does become a supply chain issue potentially for
10 this.

11 Conversely, we received public
12 comments from other stakeholders, including,
13 well, various stakeholders that is similar to
14 these other things, that the hours spent
15 submitting a petition and years spent for the
16 petition to go through and potentially go through
17 rulemaking, they could be spending that same
18 amount of time and effort in developing an
19 organic supply chain.

20 So those are kind of the two sides of
21 the coin. I'll leave it at that and open it up
22 for discussion.

1 MS. DE LIMA: Emily.

2 MS. OAKLEY: Thailand has a
3 comparatively robust organic farming community.
4 Farmers of various different sizes, including
5 some of the smaller producers that we were
6 referring to in the previous material that very
7 conceivably could be engaged and allow costing of
8 this product. And I'm not convinced even by
9 their webinar testimony that they went to
10 sufficient means to determine the feasibility of
11 that.

12 But if others have other thoughts I'd
13 like to hear them.

14 MS. DE LIMA: Tom.

15 MR. CHAPMAN: I don't have a thought
16 on that one off the top of my head.

17 I did want to comment on the comment
18 made about they could invest their time in
19 developing an organic supply chain because that
20 would take less time than petitioning the
21 material. I would say those comments probably
22 came from someone who doesn't do this for a

1 living.

2 I can speak personally that it took
3 myself at a previous company more than five years
4 to source a simple Arabic dried black lime
5 organically, single ingredient from small
6 producers in a small quantity, to get that
7 through, to get someone to make that product, to
8 get it certified, to get it processed in an
9 appropriate way, and then to bring it to market
10 here in the U.S.

11 And that was just for my own usage.
12 That's before I tried to market it into other
13 processed products. And I was so tired by them I
14 quit that company and went to go to work for Clif
15 Bar. So that statement is entirely overly
16 simplistic for the difficulty in managing a
17 supply chain as complex as the one described by
18 the petition on this one.

19 MS. DE LIMA: Steve.

20 MR. ELA: You know, I try and read,
21 you know, through all this and understand it.
22 But it also sounds like a case I'm going to say

1 similar to casings where there's sourcing from a
2 number of small suppliers, it's pretty
3 distributed. By the time you start accumulating
4 things and then processing it, you know, the
5 minimum quantities are a little difficult to
6 amass.

7 I see this as potentially one where we
8 put it on 606 and it encourages, again, if
9 organic production is available they have to use
10 it. So it gives another natural gum, even though
11 it -- well, it's non-synthetic, puts something
12 else on the list that then creates a market for
13 it and then hopefully helps create a demand for
14 an organic supply chain.

15 We know there's organic tamarind pulp
16 available so, you know, maybe, I tend to agree
17 with Tom, I think those are very complex issues
18 but maybe this is actually encouraging another
19 natural gum supply.

20 MS. DE LIMA: Tom.

21 MR. CHAPMAN: I mean, at some level
22 this gum is an alternative to some of the more

1 processed non-agricultural gums, like, gel and
2 xanthan, clearly from a non-GMO source for folks
3 who had those concerns. This would potentially
4 create an alternative if formulators wanted to
5 put the effort into the products.

6 We also heard from a retailer speaking
7 about supposedly the consumer reaction or lack of
8 preference for a xanthan gum. Again, this would
9 present a different alternative for those
10 consumers if manufacturers were able to formulate
11 products with it.

12 MS. DE LIMA: Emily.

13 MS. OAKLEY: I hear all of those
14 points but I just really want to stress that the
15 petitioner said that this comes from wild crafted
16 tamarind in Thailand. And I really can't stress
17 enough that there is a robust, a very
18 comparatively robust organic farmer community in
19 Thailand of different sizes. And so I really
20 want to them first reach out in a more explicit
21 way to the certifiers in Thailand and certified
22 organic farm groups to see if there is a

1 possibility. Because it would just augment an
2 already burgeoning organic farming community and
3 supply chain in Thailand.

4 I'm not going to say I'm an expert on
5 this because I'm not, but I still will not be
6 voting to list this material until I would see
7 more evidence that it wasn't going to be possible
8 to certify it wild craft organic in Thailand more
9 robustly.

10 MS. DE LIMA: Ashley and then Harriet.

11 MS. SWAFFAR: So, back to my earlier
12 comment before about 606 materials. You know, if
13 these guys get certified then they have to use
14 them as a supplier, and their quantities are
15 sufficient. So, you know, and that's why look
16 out on 606 materials, maybe the market's not
17 there right now for an organic supply, but it
18 could in a few years, and then they have to buy
19 organic.

20 So that on 606 materials I kind of
21 lean that way on that. That's why I'll be voting
22 to list.

1 MS. DE LIMA: Harriet.

2 MS. BEHAR: So, we did have someone
3 speak to this on the webinar. And I asked about,
4 you know, how they were working at it. And they
5 first said, well, we can't find tamarind seed in
6 Thailand. And then I went on the integrity
7 database, so I found tamarind seeds in Thailand.

8 And he is getting now conventional
9 tamarind seed from Thailand and somehow making it
10 into a gum. I don't know in what country he's
11 making it into a gum. But I think that if you
12 could get organic tamarind seed in Thailand and -
13 - or non-organic and make it into a gum, had
14 there is organic tamarind seed available in
15 Thailand, there's not extra, perhaps it's too
16 small an amount that he needs to justify an
17 organic grown, I don't know.

18 All of the -- you know, or maybe it
19 doesn't keep very long so you can't make it. But
20 that was not clear to me in the petition. But it
21 just seems that they're so close that there is
22 organic tamarind seed in Thailand. They're

1 making the conventional tamarind seed gum from a
2 Thai source. And so it seems that putting it on
3 606, right now if they want to use tamarind seed
4 gum they have to get it organically.

5 So I think it's a matter of do we want
6 to encourage them more strongly and not put it on
7 the list? Or put it on the list and do more of a
8 nudge rather than a push?

9 MS. DE LIMA: Sue.

10 MS. BAIRD: I think I echo Ashley's.
11 If there is organic and if it's on 606, they must
12 obtain it. They have to do their due diligence.

13 I've seen -- and I hear what you're
14 saying, Harriet -- I've seen sometimes perhaps
15 the opposite. If there's organic and if -- and
16 their neighbors see it, wow, they're getting \$20
17 more per pound for organic than I'm getting from
18 my conventional, sometimes that's a push for them
19 to go organic.

20 So, sometimes having it available and
21 being able to put it on their not available in
22 sufficient quantity now, but they see that

1 they're getting, their neighbors are getting good
2 premiums, it pushes them, more people, to go
3 organic.

4 MS. DE LIMA: Tom.

5 MR. CHAPMAN: Just for the sake of
6 time, unless further debate is going to change
7 someone's opinion or someone's un-made up and
8 would want for the debate, I'm hoping we can wrap
9 this up shortly.

10 MR. BRADMAN: I just have one question
11 for Harriet.

12 In the letter from the petition they
13 said that they were unable to find organic
14 certified seed, no source of organic tamarind
15 seed or organic tamarind kernel powder on the NOP
16 Organic Integrity Database. Sounds like you
17 found otherwise?

18 MS. BEHAR: I did not actually try to
19 buy it. But it was on the database. So perhaps
20 that's an old listing or I don't know. I did not
21 contact the manufacturer and say -- not tamarind
22 seed gum but just tamarind seed.

1 MR. CHAPMAN: There's three crop
2 entries for tamarind on the Organic Integrity
3 Database for the country of Thailand. They also
4 have what I would look at hundreds of other crops
5 on their certificate. So it's really hard to
6 quantify if they're truly a -- when I see that
7 when I'm sourcing stuff, it generally means it's
8 a smaller producer or background producer, but it
9 could also be a grow group. So it's a little
10 hard to quantify.

11 I do want to note back, though, to the
12 comments made by the petitioner on the phone that
13 there's different applications for types of
14 tamarind and that they're not looking for the
15 entire tamarind product, the pulp, which is a
16 common food ingredient. They're looking for the
17 seeds, to make the seeds, the gum out of. And
18 they also need a specific variety of tamarind
19 that has white seeds. And none of that detail at
20 all is apparent in the Organic Integrity
21 Database.

22 MR. ELA: Yeah, and I was going to say

1 the same thing. I think when you read the actual
2 petition, and I didn't put it in the full write-
3 up because it gets down in the weeds but, yeah,
4 there were dark kernels and white kernels. And
5 they're buying them at farmers' markets and
6 accumulating.

7 So I think there are some -- it's not
8 quite as easy as just backing up the truck to the
9 processing plant and loading all the seeds in it.
10 So I did want to give them -- they did explain
11 that fairly clearly in the petition and I, I
12 mean, I think we can argue over due diligence,
13 but at least compared to previous petitions this
14 one felt like they actually did go through in
15 fairly good detail and they did respond to our
16 questions.

17 MS. DE LIMA: All right. We're going
18 to move to a vote.

19 MR. CHAPMAN: Okay. So we have two
20 motions again, a classification motion and then a
21 listing motion.

22 The first one is to classify tamarind

1 seed gum as agricultural non-synthetic. The
2 motion was made by Steve and seconded by Lisa.

3 And in the voting a yes vote is to
4 classify as agricultural. A no vote's to not
5 classify. And the voting will start with A-dae.

6 MS. ROMERO-BRIONES: Yes.

7 MS. OAKLEY: Yes.

8 MS. BAIRD: Yes.

9 MR. BUIE: Yes.

10 MS. SWAFFAR: Yes.

11 MR. RICH: Yes.

12 MS. BEHAR: Yes.

13 DR. SEITZ: Yes.

14 MR. MORTENSEN: Yes.

15 MR. ELA: Yes.

16 MR. BRADMAN: Yes.

17 DR. GREENWOOD: Yes.

18 MS. DE LIMA: Yes.

19 MR. SCHWARTZ: Yes.

20 MR. CHAPMAN: Chair votes yes.

21 MR. RICH: That's 15 yes, 0 no, 0

22 absent.

1 MR. CHAPMAN: The motion passes.

2 The next motion is to recommend the
3 addition of tamarind seed gum, limited to non-
4 acid hydrolysis forms, at 205.606.

5 The motion was made by Steve and
6 seconded by Lisa. A yes vote is to recommend
7 this listing. A no vote is to not recommend
8 listing. And the voting will start with Emily.

9 MS. OAKLEY: No.

10 MS. BAIRD: Yes.

11 MR. BUIE: Yes.

12 MS. SWAFFAR: Yes.

13 MR. RICH: Yes.

14 MS. BEHAR: Yes, with a nudge.

15 DR. SEITZ: No.

16 MR. MORTENSEN: No.

17 MR. ELA: Yes.

18 MR. BRADMAN: Yes.

19 DR. GREENWOOD: Yes.

20 MS. DE LIMA: Yes.

21 MR. SCHWARTZ: Yes.

22 MS. ROMERO-BRIONES: No.

1 MR. CHAPMAN: Chair votes yes.

2 MR. RICH: Eleven and 4 here. Excuse
3 me. 11 yes and 4 no, 0 absent.

4 MR. CHAPMAN: The motion passes.

5 Lisa.

6 MS. DE LIMA: Do we want to --

7 MR. CHAPMAN: No, we're going.

8 MS. DE LIMA: You don't want to defer
9 it to the end since it's not a -- it's a
10 discussion document?

11 MR. CHAPMAN: No. I just say we keep
12 the discussion short.

13 MS. DE LIMA: Okay. All right, so
14 next, last item on the agenda is pullulan,
15 pullulan.

16 Let's see. So, this is a discussion
17 document. We just got the TR back about a month
18 ago so we didn't have time to bring this forward.
19 We'll be bringing it forward at the spring
20 meeting. So this is an opportunity to get
21 additional -- to get a first round of public
22 comment in and the board to get familiar with the

1 material.

2 All right. So, this petition was
3 submitted, and it was to add pullulan into the
4 National List at 205.605(a) as an allowed
5 agricultural non-synthetic ingredient for use in
6 tablets and capsules for dietary supplements only
7 allowed in the made with organic category.

8 The petition was submitted by the OTA
9 on behalf of its Nationalist Innovation Working
10 Group. And they stated that the petition was
11 twofold:

12 One, it was to protect the continued
13 production and availability of USDA NOP certified
14 dietary supplements; and to continue to support
15 the commercial development of organic pullulan.

16 For dietary supplements the capsule is
17 considered to be an ingredient, and must either
18 be certified organic or made up of ingredients
19 compliant with the NOP, with the National List.

20 And since the early 2000s, certifying
21 agents have been classifying pullulan as
22 agricultural and allowing it in the dietary

1 supplements in the made with organic category.

2 And then after the NOP's
3 classification materials guidance came out in
4 2016, there was a little bit of disagreement in
5 the certifier world on whether pullulan should be
6 classified as non-ag and a non-synthetic
7 substance. So, under the classification of non-
8 ag and non-synthetic, pullulan would need to
9 appear on the National List in order for it to be
10 used in those dietary supplements in the made
11 with organic category.

12 Right now there are no other NOP
13 compliant vegetarian options available for
14 producing organic encapsulated supplements.
15 Organic pullulan is currently not commercially
16 available in the U.S. And according to the
17 petition, the owner of the U.S. patents which
18 cover the pullulan capsules are in the process of
19 developing an organic pullulan.

20 The only other alternative practice
21 for supplement manufacturers would be to use
22 gelatin capsules listed on 205.606, but this

1 would be problematic for those consumers looking
2 for vegetarian product.

3 The economic estimate is current
4 manufacturers lost their organic certification
5 because they wanted to continue to use pullulan
6 was estimated at 825 million.

7 So, like I said, we have got a TR. We
8 just didn't deem it sufficient and will be
9 bringing forward our proposal in the spring.

10 With that -- oh, I will add we got a
11 fair amount of public comment in favor of listing
12 pullulan. And that came from manufacturers, as
13 well as some certifiers.

14 So, with that I want to open it up for
15 a brief discussion from the board if folks have
16 questions, comments.

17 MR. CHAPMAN: I would just like to
18 thank folks for the public comment. It's meant
19 to help streamline these petition discussion
20 documents, help streamline these processes. And
21 if we had this for some of the petitions we had
22 today I think we would have been probably in a

1 better spot to vote on them. So, thank you for
2 helping us with the information earlier on in the
3 process.

4 MS. DE LIMA: Steve.

5 MR. ELA: I would echo that. I think
6 this discussion makes it much easier for the
7 subcommittee then to go back and discuss it. And
8 I also think that on controversial materials it
9 gives a heads-up to the petition of what issues
10 they might need to address before the
11 subcommittee goes to a vote, which would make
12 something like silver maybe hopefully clearer.

13 So I think it's a good process.
14 Thanks, Lisa.

15 MS. DE LIMA: All right. I think that
16 concludes the Handling Subcommittee.

17 MR. CHAPMAN: Collagen? Collagen?

18 MS. DE LIMA: Oh no, there's one more.

19 (Laughter.)

20 MR. CHAPMAN: Slim Jims, organic Slim
21 Jims. Come on.

22 MS. DE LIMA: But it's not mine. So,

1 Asa, collagen gel.

2 MR. BRADMAN: This is a similar
3 discussion document as the previous one to get
4 the questions out there in the community.
5 Collagen gel, I think it's a pretty interesting
6 case here, is basically a material that's
7 extracted from animal skins to produce a
8 coextruded coating for sausage production. It
9 seems like it's primarily for the fully cooked
10 sausages.

11 To kind of summarize some of the
12 comments related to it from the manufacturer and
13 one contract producer, there is a lot of, you
14 know, clearly favorable support. Some of the
15 benefits considered was that it provides more
16 opportunity for single species sausages, so you
17 don't have the use of mixed species, in
18 particular hard casings being used on other
19 sausage projects -- products.

20 And according to their market, their
21 understanding of the market, there's definitely
22 some preference to avoid, to have less -- to have

1 more choice in that matter, particularly for
2 chicken sausage, and materials that people don't
3 want non-bird sources of sausage.

4 You know, I think the issue with this
5 material is that it's like the casings which
6 we've already approved, it would be coming from
7 animals that were not raised organically. And
8 just to quote one comment from, I think this was
9 from Alan Lewis, "this is one of the most
10 dangerous petitions I can imagine for the
11 integrity of the National Organic Program and the
12 survival of organic livestock producers," kind of
13 reflecting that concern about the use of non-
14 organic livestock as the source.

15 And according to the petitioners there
16 are not -- the scale of the market is such that
17 there's not available organic source material to
18 produce the coextruded collagen gels.

19 In terms of materials that are already
20 on the National List where there's some
21 similarities, of course there's the casings that
22 we've approved in the last year. And then also

1 gelatin, which is essentially a similar material.
2 Chemically it's almost identical. But it's
3 perhaps a little more processed than the collagen
4 gel itself.

5 I think that's kind of an
6 introduction, overview of the issues. I don't
7 know if you want to have any discussion or bring
8 that forward in another study.

9 MS. DE LIMA: Tom.

10 MR. CHAPMAN: I mean, it seems to me
11 that this material suffers from the same supply
12 chain constraints that other similar materials
13 suffer from.

14 MS. DE LIMA: All right. I mean, I
15 will add since there was that retailer comment, I
16 don't share that view. I don't -- there's not a
17 lot of certified organic meat products on the
18 market. I mean, it's growing. It's grown over
19 the last 20 years. But I don't see this being
20 very different than the casings that are already
21 on the market. And to me this just expands the
22 consumer base for buying certified organic meat

1 products, which I would like to see more of, you
2 know.

3 MR. CHAPMAN: Yeah. And I guess, I
4 don't know, the more you can build a market for
5 that finished organic product, the more meat
6 products that goes through those processing
7 plants, and the higher likelihood you're going to
8 be able to generate enough business to make an
9 economic model to then turn these byproducts into
10 value add organic products.

11 MS. DE LIMA: All right. I think
12 we're done.

13 MR. CHAPMAN: All right. Thank you,
14 Lisa, for that. I think we're just going to keep
15 going. And I'm going to cancel -- No, I'm
16 joking.

17 (Laughter.)

18 MR. CHAPMAN: We're going to take
19 lunch and see how we get progressively more
20 aggressive as we get more and more "hangry."

21 All right. It's 1:15, 1:20 by my
22 clock, but we're still coming back at 2:15. So

1 55 minutes for lunch. We'll start off with the
2 Crop Subcommittee.

3 Board members, don't run away, we're
4 going to take a photo and then you can go get
5 lunch. So, quickly, quickly take a photo.
6 Quickly gather by the USDA logo.

7 We're in recess until 2:15.

8 (Whereupon, the above-entitled matter
9 went off the record at 1:20 p.m. and resumed at
10 2:15 p.m.)

11 MR. CHAPMAN: Okay, we're going to
12 come to order. It looks like all Board members
13 are present and we'll be moving into the crops
14 section of the agenda and I'll hand the meeting
15 over to the Crops Chair, Steve.

16 MR. ELA: All right, we're about a
17 half hour behind, so I'm going to encourage the
18 Crops Committee when we present sunsets, just
19 like we did before, you know, the materials were
20 in the book, so present the controversial side of
21 it or things that came up in public comment that
22 were new so we can -- and I'll try and keep

1 things fairly tight so we can stay on schedule or
2 gain a little time back since I'm one of the ones
3 that has to leave tonight.

4 So, we'll start with sunsets and the
5 first on, Clarissa, we'll start with alcohols.

6 DR. MATHEWS: Section 205.601
7 Synthetic Substances Allowed for Use in Organic
8 Crop Production.

9 Paragraph A, as algaecide
10 disinfectants and sanitizer including irrigation
11 system cleaning systems, alcohols, the listing is
12 ethanol.

13 MR. ELA: Jesse?

14 MR. BUIE: The NOP has allowed ethanol
15 in organic crop production for over 20 years.
16 Public comments were largely in favor of
17 relisting ethanol because the material is a good
18 example where there are several sanitizers and
19 disinfectants listed for organic use in rotation
20 to reduce disease resistance.

21 The public comments were
22 overwhelmingly for relisting.

1 Are there any questions?

2 MR. ELA: Discussion?

3 Tom?

4 MR. CHAPMAN: Yikes. Okay, so we have
5 a motion to remove ethanol from the national
6 list. This is a sunset item, so just remember a
7 no vote is to retain the listing, a yes vote is
8 to remove it.

9 The motion was made by Jesse and
10 seconded by Harriet.

11 And the voting will start with Sue.

12 MS. BAIRD: No.

13 MR. BUIE: No.

14 MS. SWAFFAR: No.

15 MR. RICE: No.

16 MS. BEHAR: No.

17 DR. SEITZ: No.

18 MR. MORTENSEN: No.

19 MR. ELA: No.

20 MR. BRADMAN: No.

21 DR. GREENWOOD: No.

22 MR. SCHWARTZ: No.

1 MS. ROMERO-BRIONES: No.

2 MR. CHAPMAN: Chair votes no.

3 MR. RICE: That's zero yes, 15 no's,
4 zero absent.

5 MR. CHAPMAN: Motion fails.

6 Steve?

7 MR. ELA: Sorry, alcohols?

8 DR. MATHEWS: At Section
9 205.601(a)(1), the listing is isopropanol.

10 MR. BUIE: The NOP has allowed
11 isopropanol alcohol use in crops for over 20
12 years. The new -- there was no new scientific or
13 significant information was presented to warrant
14 removal of the material.

15 Again, public comments were
16 overwhelmingly in favor of relisting isopropanol.

17 Are there any questions?

18 MR. ELA: Tom?

19 MR. CHAPMAN: We have a motion to
20 remove isopropanol from the national list.

21 The motion is made by Jesse and
22 seconded by Emily.

1 A yes vote is to remove, a no vote is
2 to retain and the voting will start with Jesse.

3 MR. BUIE: No.

4 MS. SWAFFAR: No.

5 MR. RICE: No.

6 MS. BEHAR: No.

7 DR. SEITZ: No.

8 MR. MORTENSEN: No.

9 MR. ELA: No.

10 MR. BRADMAN: No.

11 DR. GREENWOOD: No.

12 MS. DE LIMA: No.

13 MR. SCHWARTZ: No.

14 MS. ROMERO-BRIONES: No.

15 MS. OAKLEY: No.

16 MS. BAIRD: No.

17 MR. CHAPMAN: The Chair votes no.

18 MR. RICE: That's zero yes, 15 no,
19 zero absent.

20 MR. CHAPMAN: Motion fails.

21 Steve?

22 MR. ELA: Okay, we'll move on to

1 sodium carbonate peroxyhydrate.

2 DR. MATHEWS: At Section
3 205.601(a)(8), sodium carbonate peroxyhydrate CAS
4 Number 15630-89-4, federal law restricts the use
5 of this substance in food crop production to
6 approved food uses identified on the product
7 label.

8 MR. ELA: I actually don't know if
9 Emily or Dave is doing this, it was split.

10 MS. OAKLEY: It is actually me.

11 MR. ELA: Okay.

12 MS. OAKLEY: Yes.

13 MR. ELA: Emily?

14 MS. OAKLEY: So, this is used an
15 algaecide in rice fields, ponds, ditches and
16 irrigation lines. It was originally added to the
17 national list in the hopes that it would be used
18 as an alternative to copper sulfate in rice.

19 It is highly toxic to bees which
20 should be noted and was noted by a public
21 commenter.

22 And, we received some comments in the

1 spring in relation to this, but far fewer than we
2 were hoping for.

3 We received basically similar comments
4 this time around as well in addition to one farm,
5 Bolthouse Farms in California that grows carrots
6 that uses it.

7 I had additional conversations with
8 CCOF via email about this because they are the
9 certifier that has producers using this material.
10 They have 49 people using it, of those, nine do
11 grow rice.

12 But, when they reached out to their
13 members, only one person wrote back about using
14 this in conjunction with copper sulfate. That
15 doesn't mean that other people aren't doing it,
16 that was just the response rate that they heard.

17 I think the take-home message from
18 this material is that, it was added in the hopes
19 of replacing copper sulfate or at least
20 minimizing some of its use. That probably has
21 not happened to the extent that it was originally
22 hoped for.

1 I underscore the value of farmer to
2 farmer exchange, especially for the one producer
3 that we know is using it and might be able to
4 present that material and that innovation to
5 other growers.

6 We did have a split vote in the
7 Subcommittee on this. I did vote to delist it at
8 that time and so did Harriet, I believe. And so,
9 I wanted to ask Harriet if you still felt that
10 way or if I got that wrong, if it was someone
11 else, sorry about that.

12 MS. BEHAR: Well, I'm just kind of
13 curious about the usage, how, you know, is it
14 being used -- I don't have as much issue with
15 allowing it, especially if it's not being in
16 heavy use.

17 You know, if it's being used in
18 rotation with other things or whatever, I think
19 maybe it's --

20 MS. OAKLEY: When it's used, I think
21 it's predominantly used as an irrigation cleaner
22 and as water treatment probably in ponds and

1 other ditches or other waterways.

2 I think it isn't heavily used. I
3 think it is a low toxicity chemical relatively
4 speaking. Of course, as I noted, toxicity to
5 bees.

6 I am inclined to change my vote at
7 this point. But, I also do think that it
8 underscores the importance of recognizing the
9 only added material with a certain intention that
10 may not always be the case. That may not how be
11 -- may not be how the material is adopted.

12 And when it has a board classification
13 as an algaecide, it's going to be used in other
14 ways.

15 That's my comment. Any comment or
16 discussion?

17 MR. ELA: Other discussion?

18 MR. MORTENSEN: Yes, just quickly.
19 With limited surface water, bees get their -- the
20 water needs that they have from nectar and from
21 pools of water. So, unfortunately, there's
22 probably some degree of exposure here that will

1 happen.

2 But, other than that, I have no
3 comment.

4 MR. ELA: Other discussion?

5 I'll say that I was originally a
6 little skeptical on renewing this one, hearing
7 some of the public comment and that there are
8 some uses for it.

9 I'm more inclined to vote for it at
10 this point. I guess that the case wasn't made
11 that it should be taken off. I mean, I don't
12 know if it was made to stay on, but in the
13 absence of clear marker either way, it makes me
14 lean towards leaving it on. Anybody else?

15 Dave?

16 MR. MORTENSEN: Yes, I was also struck
17 by the comments we got on this and several other
18 things that we did not have that information as
19 recently as a month ago.

20 So, we did hear a lot about this one,
21 aqueous potassium silicate and others since we
22 were voting on them.

1 MR. ELA: Emily?

2 MS. OAKLEY: Just in conclusion, I
3 think an argument that Dave made in the
4 Subcommittee should be repeated here that we
5 don't want to remove a lower toxicity chemical,
6 even if it isn't being used for that use right
7 now.

8 But, I do think we want to avidly
9 encourage innovation and spreading of information
10 where it might be being used.

11 MR. ELA: Okay, anything else?

12 Tom?

13 MR. CHAPMAN: All right, we have a
14 motion to remove sodium carbonate peroxyhydrate
15 from the national list.

16 The motion was made by Emily and
17 seconded by Jesse.

18 This is a yes vote will be to remove,
19 a no vote to retain and the voting will start
20 with Ashley.

21 MS. SWAFFAR: No.

22 MR. RICE: No.

1 MS. BEHAR: No.

2 DR. SEITZ: No.

3 MR. MORTENSEN: No.

4 MR. ELA: No.

5 MR. BRADMAN: No.

6 DR. GREENWOOD: No.

7 MS. DE LIMA: No.

8 MR. SCHWARTZ: No.

9 MS. ROMERO-BRIONES: No.

10 MS. OAKLEY: No.

11 MS. BAIRD: No.

12 MR. BUIE: No.

13 MR. CHAPMAN: The Chair votes no.

14 MR. RICE: That's zero yes, 15 no,

15 zero absent.

16 MR. CHAPMAN: The motion fails.

17 Steve?

18 MR. ELA: All right, newspaper,

19 Clarissa?

20 DR. MATHEWS: This material appears at

21 two listings within the national list, at

22 205.601(b) Herbicides, Weed Barriers, as

1 applicable, Mulches.

2 And then, also at 205.601(c) as
3 compost feed stocks.

4 And, the listing is newspaper or other
5 recycled paper without glossy or colored inks.

6 MR. ELA: Harriet?

7 MS. BEHAR: So, we did get a new TR on
8 newspaper and reviewed that in great depth.

9 The public was universally in support,
10 although except one organization.

11 There was some discussion about using
12 it in conjunction with plant-based materials. I
13 know when I've used newspaper as a mulch, I put
14 it underneath my straw or hay just to prevent
15 that light from coming through. I believe that's
16 what they're referring to.

17 And, the one organization talked about
18 that we should be encouraging more plant-based
19 mulches. That's it.

20 MS. ELA: Discussion?

21 Emily?

22 MS. OAKLEY: I do think it's worthy of

1 people to read the supplemental TR because it --
2 we were hoping that it would reveal fewer toxins
3 in paper, but it actually reveals higher toxins
4 in paper than probably were originally in the
5 listing back in the day.

6 And, the difficulty of removing glossy
7 paper and ink paper from newspapers has also
8 increased, but I don't think we can address them.

9 I just want to reiterate that the
10 level of exposure has probably increased, not
11 decreased over time.

12 MR. ELA: Other discussion?

13 Tom?

14 MR. CHAPMAN: So, we have a motion to
15 remove newspaper and other recycled paper from
16 the national list.

17 The motion was made by Harriet and
18 seconded by Asa.

19 A yes vote is to retain, a no vote --
20 a yes vote is to remove, a no vote is to retain
21 and the voting will start with Scott.

22 MR. RICE: No.

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MS. BEHAR: No.

DR. SEITZ: No.

MR. MORTENSEN: No.

MR. ELA: No.

MR. BRADMAN: No.

DR. GREENWOOD: No.

MS. DE LIMA: No.

MR. SCHWARTZ: No.

MS. ROMERO-BRIONES: No.

MS. OAKLEY: No.

MS. BAIRD: No.

MR. BUIE: No.

MS. SWAFFAR: No.

MR. CHAPMAN: The Chair votes no.

MR. RICE: That's zero yes, 15 no,
zero absent.

MR. CHAPMAN: The motion fails.

MR. ELA: Plastic mulch and covers.

Clarissa?

DR. MATHEWS: At Section 205.601(b) as
Herbicides, Weed Barriers, as applicable,
Mulches.

1 The listing is plastic mulch and
2 covers, petroleum based other than polyvinyl
3 chloride (PVC).

4 MR. ELA: Harriet?

5 MS. BEHAR: Okay. So, there was
6 pretty good support for this material discussing
7 the way that it warms soil and controls weeds.

8 And, many producers also wrote in and
9 talked about that they could not farm or produce
10 certain crops without it.

11 There, in the discussion, we talked
12 about burning of that plastic when it's removed
13 from the soil, which is part of the annotation.

14 And, one commenter stated that the
15 annotation would be informative, but it is
16 already covered by the Federal Clean Air Act and
17 some state statutes.

18 There was comment, too, by numerous
19 certifiers and advocacy groups about wanting us
20 to move forward with biodegradable, biobased
21 mulch. But that does not really affect this
22 listing.

1 And, there was one last comment, too,
2 that we should be moving more towards plant-based
3 mulches and away from petroleum.

4 MR. ELA: Discussion?

5 Emily?

6 MS. OAKLEY: I was the abstention in
7 the Subcommittee and I will be abstaining again
8 because I'm a farmer representative. I could
9 certainly not vote against this material, but I
10 have reservations, great reservations about the
11 widespread use and reliance on this both because
12 of the waste output and the concern of growing
13 with plastic touching your crops and soil. But,
14 I understand its widespread use.

15 MR. ELA: Yes, there is no doubt that
16 there is heartburn over this issue and that we
17 would all prefer alternatives.

18 Other discussion?

19 Harriet?

20 MS BEHAR: And, I agree with Emily
21 that there is actually a lot of concern at times
22 of heavy rains that the water can't infiltrate if

1 you've got a whole field or say, many high
2 tunnels in a row that there can be quite severe
3 erosion from the water running off of plastic.

4 But, it is an extremely useful
5 production aid, as I said, for weed control and
6 for warming soil and even for insect management
7 when you use different colored mulches, silver
8 and red and things like that.

9 MR. ELA: Tom, do you have a comment?

10 MR. CHAPMAN: Yes, I mean, I think we
11 all know the alternative here is the
12 biodegradable, biobased mulch.

13 I notice in the public comment that
14 there was a research project going on, I think a
15 USDA funded research project that was at
16 University of Tennessee about some other campuses
17 including Washington State.

18 And, I notice we're traveling to the
19 State of Washington, so I don't know if there's
20 an opportunity there to potentially get some
21 update on that research and their, you know,
22 early findings if they'd be willing to share it.

1 DR. TUCKER: I would also echo what
2 Paul said yesterday about this topic of
3 biodegradable mulches being of particular
4 interest to the program given the current status
5 of the listing and our policy memo on the topic.

6 So, this is an area we plan to pay
7 some attention to in the coming months.

8 MR. ELA: Jenny, can I ask on that, so
9 the program's paying attention to that. Is that
10 something we need to consider for a work agenda
11 item for the NOSB or should we just let you play
12 it out?

13 DR. TUCKER: I think the program may
14 initiate a -- there has been requests from the
15 Board to look at this. And so, I think that we
16 could see this as an NOP initiated work agenda
17 item to the Board to open that dialogue.

18 MR. ELA: Great, that's -- I'm pleased
19 to hear that.

20 So, Emily, one last comment?

21 MS. OAKLEY: Yes, I just I forgot to
22 say that I'm growing strawberries on plastic

1 mulch right now, so, just some hypocrisy in my
2 thinking.

3 MR. ELA: Scott?

4 MR. RICE: Just a quick note on the
5 Washington trials, those are just north of
6 Seattle in the Mount Vernon area and I'm sure
7 that we could get the folks involved in that to
8 address our meeting in the spring.

9 But, I do know, at last check, the
10 materials that they are using in their trials are
11 not -- do not fit the current definition as was
12 passed for biodegradable mulch.

13 MR. ELA: Fair enough.

14 Asa?

15 MR. BRADMAN: Just one last comment.

16 I just want to echo the heartburn and, if we can,
17 figuratively, at least, bring in all of the prior
18 comments related to concerns about plastic and
19 waste and into the transcript, or at least refer
20 it into the transcript for today's meeting.

21 Because, there's really it's a
22 tremendously challenging issue and also a

1 tremendous force of basically a toxic waste
2 material directly from organic production and
3 also related to the difficulties of recycling it
4 because of its contamination by soil and other
5 materials.

6 MR. ELA: I think we can move to the
7 vote, Tom.

8 MR. CHAPMAN: Okay. We have a motion
9 to remove plastic mulch and covers petroleum
10 based other than polyvinyl chloride from the
11 national list.

12 The motion was made by Harriet and
13 seconded by Dave.

14 A yes vote is to remove, a no vote is
15 to retain the listing and the voting will start
16 with Harriet.

17 MS. BEHAR: No.

18 DR. SEITZ: No.

19 MR. MORTENSEN: No.

20 MR. ELA: No.

21 MR. BRADMAN: No.

22 DR. GREENWOOD: No.

1 MS. DE LIMA: No.

2 MR. SCHWARTZ: No.

3 MS. ROMERO-BRIONES: No.

4 MS. OAKLEY: Abstain.

5 MS. BAIRD: No.

6 MR. BUIE: No.

7 MS. SWAFFAR: No.

8 MR. CHAPMAN: Chair votes no.

9 MR. RICE: No.

10 That's one -- excuse me, zero yes, 14
11 no, one abstention, zero absent.

12 MR. CHAPMAN: Motion fails.

13 Steve?

14 MR. ELA: Aqueous potassium silicate,
15 Clarissa?

16 DR. MATHEWS: At Section 205.601(j),
17 I'm sorry, (i), As Plant Disease Control, aqueous
18 potassium silicate CAS Number 1312-76-1, the
19 silica used in the manufacture of potassium
20 silicate must be sourced from naturally occurring
21 sand.

22 MR. ELA: Dave?

1 MR. MORTENSEN: Yes, very quickly,
2 this is -- this particular application is for
3 insect and mite control. It would be sprayed on
4 as a foliar application.

5 And, the idea is that the silica that
6 results from the application will either have
7 direct effects on insects that would be feeding
8 on the leaves or indirect effects by uptake of
9 the silica tetrahedra across various cells on the
10 leaf surface that would induce a plant defense
11 where the plant then upregulates and produced
12 defense compounds.

13 At the time of our review when the
14 Subcommittee voted on this, we had heard little
15 from stakeholders on whether or not it's being
16 used. And, we had a very limited data set or
17 data sets on efficacy.

18 The Subcommittee posted several
19 questions asking for folks to get back to us and
20 we heard from quite a few people.

21 Their response on is it being used was
22 highly regionally skewed with California

1 certified organic and several consultants from
2 the Pacific Northwest responding that it is used
3 for mite and spider suppression in veg crops.

4 And, from my read on that, it was
5 mostly an argument that having this tool in the
6 toolbox adds another practice, another compound
7 that could be used that would reduce selection
8 for resistance and other problems as well as a
9 replacement of things that we would like to see
10 there be less used of, for example, copper
11 sulfate, at least in the case of the disease
12 management.

13 So, we appreciated all that feedback.

14 Interestingly, in the Midwest and in
15 the East we had, you know, folks responding,
16 Pennsylvania certified organic, for example, that
17 they had no folks responding that they were using
18 it.

19 The Committee discussed for quite a
20 bit about, and we saw this reflected in public
21 comments, so the public comment was, you know,
22 there are folks using it.

1 But, we were also interested in
2 information on, you know, field worker and
3 applicator exposure.

4 And, the concern here is that the data
5 that we had to go on that's, one, evaluating the
6 mechanism of action of the compound is
7 contradictory and thin.

8 And, two, whether there would be an
9 impact on the animals that would be feeding on
10 plants that were sprayed including humans, would
11 result in health effects.

12 And, that was a concern. So, that
13 would be my summary of this.

14 When it was last relisted in fall of
15 2014, the Crops Subcommittee voted 4-3 in favor
16 of removal. And, the broader Committee Board
17 voted 9-7 to retain the compound.

18 MR. ELA: Discussion?

19 Harriet?

20 MS. BEHAR: Well, we did get quite a
21 few -- quite a bit of feedback from producers,
22 from the manufacturer giving us information on

1 the efficacy, because our questions were efficacy
2 and essentiality.

3 And, I was surprised to see the number
4 of CCOF growers and the producers, including a
5 former NOSB member, actually, I think more than
6 one mentioning to see this material be retained.

7 I don't really see that there is that
8 much of an environmental issue. And, actually,
9 in biodynamic farming, you do spray actually a
10 silica as an insect control or, you know, to make
11 the fibers in the plant less palatable to the
12 insects.

13 And, so, I'm probably going to change
14 my vote on this seeing that there is a need for
15 it and I would hate to take away that tool from
16 all those producers.

17 MR. ELA: I agree, Harriet, there was
18 a very strong response and I continue to be
19 concerned about the lack of data that helps us to
20 assess that the safety of its use, that continues
21 to be a concern of mine.

22 But, there is no question that we

1 heard from folks that they are using it some in
2 an integrated pest management program and on the
3 West Coast for sure.

4 Asa?

5 MR. BRADMAN: One thing that raised
6 concerns for me in terms of the Subcommittee
7 discussions was the fact that it essentially acts
8 as a systemic compound and it's going into the
9 plant and then altering the plant.

10 And, to me, that puts it in a slightly
11 different category and raises concerns for me,
12 just almost in principle philosophically.

13 It's not like a systemic pesticide
14 that, you know, the toxic material is there and,
15 you know, you can't wash it out.

16 At the same time, though, the
17 mechanism here is just concerning to me and
18 that's why I voted to not relist it.

19 MR. ELA: Other comments?

20 Emily?

21 MS. OAKLEY: This is a question for
22 Dave. If you are going to be changing your vote

1 or if you think you will stay with your original
2 vote?

3 MR. MORTENSEN: Because of the
4 concerns I had about animal and human health
5 effects of the systemic action of it, I will
6 continue to be voting to delist.

7 MR. ELA: Other comments?

8 I will make one, but I'll defer. But,
9 I think I voted to delist this in the
10 Subcommittee, I'll be changing my vote just based
11 on the public comment.

12 My biggest worry was, essentiality and
13 whether it was being used and that, to me, was
14 adequately answered and I will just tell the
15 stakeholders that this is where public comment
16 really, I mean, the Subcommittee that voted
17 unanimously against relisting this and now it's,
18 you know, based on your comments, it does have an
19 influence.

20 So, anybody else have a comment before
21 we vote?

22 MR. MORTENSEN: I guess I would also

1 just like to say that when someone doesn't change
2 their vote because of the additional information,
3 it's not that we don't value the input, I
4 continue to value the input and it actually
5 pushed me much closer to being supportive of
6 this.

7 I was very negative about it
8 initially, as effectively a synthetic
9 insecticide. But, anyway, I'll leave it at that.

10 MR. ELA: Tom?

11 MR. CHAPMAN: We have a motion to
12 remove aqueous potassium silicate from the
13 national list.

14 The motion was made by Dave and
15 seconded by Harriet.

16 A yes vote is to recommend removal, a
17 no vote is to not recommend removal.

18 And, the voting will start with Dan.

19 DR. SEITZ: Yes.

20 MR. MORTENSEN: Yes.

21 MR. ELA: No.

22 MR. BRADMAN: Yes.

1 DR. GREENWOOD: No.

2 MS. DE LIMA: No.

3 MR. SCHWARTZ: No.

4 MS. ROMERO-BRIONES: Yes.

5 MS. OAKLEY: Yes.

6 MS. BAIRD: No.

7 MR. BUIE: No.

8 MS. SWAFFAR: No.

9 MS. BEHAR: No.

10 MR. RICE: No.

11 MR. CHAPMAN: Chair votes no.

12 MR. RICE: That's 5 yes, 10 no, zero
13 absent.

14 MR. CHAPMAN: The motion fails.

15 MR. ELA: Elemental sulfur.

16 DR. MATHEWS: If I could just
17 interject for a minute here, it appears that
18 there are two listing of this substance.

19 MR. ELA: Yes, there are two.

20 DR. MATHEWS: At (i) and (e).

21 MR. ELA: That's correct.

22 DR. MATHEWS: Okay.

1 MR. MORTENSEN: So, just very, very
2 quickly, the first draft and the second draft are
3 these two different -- it's exactly the same
4 compound. The only difference here is that the
5 compound is being targeted for use for fungal and
6 plant disease management.

7 And, here, the target is powdery
8 mildew. And, Tom, you're wrinkling your brow.
9 Is there a question or --

10 MR. CHAPMAN: I'm confused. For
11 aqueous potassium silicate, there's only one
12 listing, isn't there, in our books?

13 MR. MORTENSEN: Well, the book -- I
14 have it as two and we --

15 DR. TUCKER: There --

16 MR. MORTENSEN: -- voted --

17 DR. TUCKER: -- appears to be a
18 listing at (e) as in insecticide, including
19 acaricides or mite control.

20 MR. MORTENSEN: Oh, you're right, and
21 then (i).

22 DR. TUCKER: And an additional listing

1 at (i) as a plant disease control.

2 MR. ELA: so, for protocol --

3 DR. TUCKER: So, the current motion,
4 the vote that just took place only addressed one
5 of those.

6 MR. ELA: So, for protocol, we should
7 probably vote on the second one, as well, Tom,
8 since they're listed twice.

9 MR. CHAPMAN: Was that an error in the
10 slide or the way we published the material?
11 Because we only voted -- I thought we had moved
12 them forward together as a grouping, it's a slide
13 issue, yes.

14 MR. ELA: We have, two, right?

15 MR. PATTILLO: The proposals were
16 done, you've completed two proposals, but we're
17 missing one slide for Section (e).

18 MR. CHAPMAN: Were the proposals
19 forwarded separately or are they done together?

20 MR. PATTILLO: They were done
21 separately.

22 DR. MATHEWS: They're separate.

1 MR. CHAPMAN: They're separate? Was
2 that the case --

3 MR. ELA: Tom, I would propose we vote
4 on the second one just to be clear.

5 MR. CHAPMAN: Yes, I just want to make
6 sure. Did we do separate ones for newspaper as
7 well or was that a single?

8 MS. SWAFFAR: There was one proposal
9 for newspaper in our packet, but two for aqueous
10 potassium silicate.

11 MR. CHAPMAN: Okay.

12 MR. ELA: And, newspaper was linked
13 together for aqueous based --

14 (Simultaneous speaking.)

15 MR. CHAPMAN: -- in mind of the two
16 listings, okay. And, is that the case with the
17 sulfurs as well?

18 MR. ELA: Sulfur, we -- a sec here --

19 MR. MORTENSEN: I think this is the
20 only one like that, as I recall.

21 MR. ELA: Sulfur, we have them all
22 grouped under one.

1 MR. CHAPMAN: And lime sulfur?

2 MR. ELA: Lime sulfur, they are
3 grouped under one.

4 MR. CHAPMAN: Okay. So just --

5 MR. ELA: So, we just --

6 MR. CHAPMAN: Just so we're clear with
7 the public, we have some level of flexibility to
8 combine or not combine, but we're going to vote
9 here based on how the Subcommittee forwarded it
10 to us. So, I guess this was one that was just,
11 unfortunately, overlooked.

12 But, the newspaper was in two listing,
13 we voted on once to recommend not sunseting it
14 for both listings. We are going to do the same
15 for the three listings on elemental sulfur and
16 the two listing for lime sulfur.

17 But, aqueous potassium silicate came
18 to us as two separate motions from the
19 Subcommittee and so we will vote on both separate
20 motions.

21 So, I think we're clear now and, Dave,
22 sorry, go ahead.

1 MR. MORTENSEN: Okay, thanks.

2 And so, the only difference is the
3 target pest group. The target pest group here or
4 plant pathogens, particularly, mildews on plants,
5 powdery mildews which are a huge disease problem
6 in all sorts of vegetables, fruits and fruit
7 crops.

8 And, really, everything else is the
9 same.

10 The comments that we received about,
11 you know, having this tool in the toolbox there
12 was specific language in a lot of the comments
13 about mite and spiders as well as powdery mildew.

14 So, the argument, again, was the same.

15 MR. ELA: Emily?

16 MS. OAKLEY: Just a point of
17 clarification for Tom. I think the reason that
18 we did this in two separate motions was because
19 it came from the Subcommittee as a removal so we
20 needed to specify both of those sections.

21 MR. ELA: Okay.

22 Are we ready for a vote?

1 MR. CHAPMAN: So, we're going to have
2 -- the one we voted on last time was (i), that
3 was what was read into the record. So, I'm going
4 to give it to Clarissa before we vote to make
5 sure we read in the (e) section.

6 MR. ELA: That makes sense.

7 MR. CHAPMAN: And, just so the public
8 knows, we're broadcasting the wrong one because
9 we don't have it up on the slide. But, we're
10 talking about 205.601(e).

11 MR. ELA: Well, Clarissa's going to
12 read it.

13 MR. CHAPMAN: Clarissa?

14 DR. MATHEWS: So, this particular
15 listing is at paragraph (e) as Insecticides
16 including acaricides or mite control and the
17 substance is aqueous potassium silicate CAS
18 Number 1312-76-1.

19 The silica used in the manufacture of
20 potassium silicate must be from naturally
21 occurring sand, sourced from naturally occurring
22 sand.

1 MR. CHAPMAN: So, just to be clear, we
2 already voted on 205.601(i) and we're now voting
3 on 205.601(e) aqueous potassium silicate.

4 We are ready for a vote.

5 MR. ELA: Ready for a vote.

6 MR. CHAPMAN: So, the seconded motion
7 from motion made by Dave, seconded by Harriet.

8 A yes vote is to -- I'm sorry, I'm
9 still reading the slide.

10 MR. ELA: It was seconded by Asa.

11 MR. CHAPMAN: The motion was made by
12 Dave, seconded by Asa.

13 A yes vote is to remove, a no vote is
14 to not recommend removal and the voting will
15 start with Dave.

16 MR. MORTENSEN: Yes.

17 MR. ELA: Yes.

18 MR. BRADMAN: No.

19 DR. GREENWOOD: Yes.

20 MS. DE LIMA: No.

21 MR. SCHWARTZ: No.

22 MS. ROMERO-BRIONES: No.

1 MS. OAKLEY: Yes.

2 MS. BAIRD: No.

3 MR. BUIE: No.

4 MS. SWAFFAR: No

5 MR. RICE: No.

6 MS. BEHAR: No.

7 DR. SEITZ: Yes.

8 MR. CHAPMAN: Chair votes no.

9 MR. RICE: We have 4 yes, 11 no, zero
10 absent. The motion fails.

11 MR. CHAPMAN: Steve?

12 MR. ELA: Thanks for that catch, Tom.
13 I skipped on those pages, and Clarissa, sorry for
14 the confusion.

15 Elemental sulfur with all three
16 listings this time.

17 DR. MATHEWS: Yes, we'll do all three
18 listings. At Section 205.601 paragraph (e) as
19 Insecticides, including the acaroides or mite
20 control, paragraph (i) is plant disease control
21 and then, again, at paragraph (j) as plant or
22 soil amendments.

1 And, the listing is elemental sulfur.

2 MR. ELA: Asa?

3 MR. BRADMAN: Thank you. And, I'll
4 say, I'll try to brief but this is an issue
5 that's dear to my heart.

6 So, just to kind of review, sulfur is
7 up for -- we have three listings here, both as a
8 nutrient, as a plant disease control.

9 And, we've had extensive public
10 comments on sulfur I would say representing
11 thousands of growers. And, across the board
12 among producers, there's strong support for this
13 and I think they've made a strong case for
14 essentiality.

15 I, you know, last spring, we talked
16 about work that I've done looking at the
17 relationship of sulfur and reduced lung function
18 in children living nearby where the materials are
19 applied.

20 And then, also, there's an extensive
21 history of sulfur causing respiratory, ocular,
22 dermal and other illnesses in farm workers.

1 And, those concerns have been raised
2 by myself and others in the community as, in some
3 cases, reason to not relist sulfur or to at least
4 encourage more controls and evaluations.

5 One thing we considered last year with
6 respect to our work was whether dust versus
7 wetable applications. If dust could be reduced,
8 that might reduce exposure.

9 And, that partly came out of
10 discussions with ag commissioners and NAPA and
11 Sonoma County where especially kind of orchard
12 blasting type applications cause a lot of drift
13 and outreach and regulatory problems among
14 neighbors.

15 We've had some thoughtful comments
16 from CCOF about use of the material and a number
17 of growers have bought specialized equipment that
18 is likely reducing the spread of especially dust
19 applications versus wettable applications.

20 Many growers talked about purchasing
21 special equipment not for just say strawberries,
22 but also for vineyards. And, often, water is not

1 available.

2 And, this relates to a suggestion, a
3 question that we posed to the organic community
4 is whether they would consider -- we could
5 consider an annotation that eliminated dust
6 applications acceptable on organic.

7 That annotation is a little bit beyond
8 what we can do for this sunset, but the responses
9 were kind of interesting.

10 There were certainly people who said
11 we absolutely support an annotation to eliminate
12 dust. Whereas, especially, I think in the wine
13 industry and in strawberries, there was like, no,
14 we need this tool.

15 I had thought about voting no on
16 sulfur just as a voice for those concerns.
17 Rather, I kind of view this as a signing
18 statement about my concerns about the material.

19 In some ways I think we should
20 separate the use as a plant nutrient from uses of
21 pesticide. It is the most heavily used pesticide
22 in California and many regions of the world. And

1 we should evaluate that separately.

2 I do think it's essential, but I think
3 it's something we need to monitor.

4 One suggestion by Beyond Pesticides is
5 to include an annotation that really emphasizes
6 the worker protection standards related to
7 sulfur, the EPA worker protection standards.

8 And, I think that's something we can
9 -- should consider and maybe even for other
10 materials to have maybe perhaps stronger
11 recommendations on workers protections.

12 I noticed that CCOF listed some of the
13 protections that go into people in their
14 certification that are using the material. And,
15 one piece that I think was left out, although I'd
16 like to clarify, is -- was lack of respiratory
17 protection and whether that's specific to here.
18 It might have been just left out. But, I know
19 that's an issue.

20 I do know growers in California who
21 used, say dust applications and their workers
22 were getting sick and they switched to a wettable

1 formulation with better protection and those
2 problems in their workers just literally went
3 away.

4 So, I think I've covered all the
5 ground on this review and perhaps we can have
6 some discussion before voting.

7 MR. ELA: Discussion?

8 Harriet?

9 MS. BEHAR: With so much pervasive use
10 in California, has there been any resistance
11 reported from, you know, from insects?

12 MR. BRADMAN: Not that I know of. I
13 mean, it's used as a miticide and, you know,
14 acaricide and it's also used as a fungicide. I
15 think the fungicide use actually predominates.

16 MR. ELA: I can say that --

17 MS. BEHAR: And, plant disease as
18 well?

19 MR. ELA: Plant disease, it's multi-
20 action and from my understanding, there's no
21 disease -- there's never been documented
22 resistance partly because it's not a single -- it

1 actually acts on multiple pathways. So, it's not
2 a single point which is, I mean, given it's been
3 used for thousands of years, it's pretty
4 stunning.

5 MR. BRADMAN: Yes. And, also just a
6 reminder, that sulfur, I mean, one real benefit
7 is that's it's not a systemic poison. You know,
8 it's not going to kill people.

9 MS. BEHAR: One other question. If we
10 decide, perhaps in the future to annotate it to
11 wettable powder only, would that take away some
12 uses that we wish would -- we still had or --

13 MR. BRADMAN: It probably would. I
14 think it would. Certainly, there -- and people
15 in the community assert that strongly. And, like
16 I said, I mean, there's some new machinery.

17 In fact, I just had a side
18 conversation with folks with a dust applicator
19 for strawberries that, you know, is low to the
20 ground and is unlikely to have the kind of
21 community wide exposures that would result say
22 from blasting a vineyard.

1 MR. ELA: I would also say if we
2 actually like for soil application, if we limited
3 it to wettable, that negates, because that's
4 often put on as a granular form so I think we'd
5 have to take that into account as well.

6 I will personally say that I would not
7 agree with annotating it for the worker
8 protection standards for the very reason that
9 that's the law. It's already the law, we don't
10 need to annotate something that's already the
11 law.

12 If an employer is not following that,
13 they should be taken to task under that.

14 And, it also means that, as those
15 standards change, we don't want to have to keep
16 messing with the list.

17 I mean, I'm not in favor of adding
18 things that are already something somebody has to
19 comply with. But I do -- I'm very sensitive to
20 the human health concerns.

21 MR. BRADMAN: Right. Yes, no, I
22 understand that. And also, it would put

1 additional -- potentially put additional burdens
2 on certifiers.

3 MR. ELA: Other comments?

4 (No audible response.)

5 MR. ELA: Tom?

6 MR. CHAPMAN: Okay, so, we have a
7 motion to remove elemental sulfur from the
8 national list and this motion does incorporate
9 all three of the listings.

10 The motion was made by Asa and
11 seconded by Harriet.

12 And a yes vote is to remove, a no vote
13 is to retain and the voting will start with
14 Steve.

15 MR. ELA: No.

16 MR. BRADMAN: No.

17 DR. GREENWOOD: No.

18 MS. DE LIMA: No.

19 MR. SCHWARTZ: No.

20 MS. ROMERO-BRIONES: No.

21 MS. OAKLEY: No.

22 MS. BAIRD: No.

1 MR. BUIE: No.

2 MS. SWAFFAR: No.

3 MR. RICE: No.

4 MS. BEHAR: No.

5 DR. SEITZ: No.

6 MR. MORTENSEN: No.

7 MR. CHAPMAN: The Chair votes no.

8 MR. RICE: That's zero yes, 15 no,
9 zero absent.

10 MR. CHAPMAN: The motion fails.

11 Steve?

12 MR. ELA: Lime sulfur.

13 Clarissa?

14 DR. MATHEWS: We have two listings in
15 Section 205.601. The first at paragraph (e) as
16 Insecticides including acaricides or mite
17 control. The listing is lime sulfur including
18 calcium polysulfide.

19 And, the second listing is at
20 paragraph (i) as plant disease control. The
21 listing is lime sulfur.

22 MR. ELA: So, this is my material,

1 full disclosure, it's something we use a fair
2 amount.

3 Most of the public comments were
4 readily in favor of lime sulfur noting it's
5 widespread use for everything from as fungicide
6 to acaricide to I think some thinning notes were
7 made as well.

8 So, there's definitely -- we heard
9 from the community essentiality. The
10 alternatives to lime sulfur are fixed copper and
11 copper sulfate, but those pose more environmental
12 risk than lime sulfur, so there may be a benefit
13 to it.

14 I think the one negative comment we
15 received was that one group would be in favor of
16 limiting the use of lime sulfur when that listing
17 could be annotated for use only when beneficial
18 arthropods are not present.

19 They were considered about its broad
20 spectrum side and that it might actually disrupt
21 biological control.

22 So, and there was a comment that prove

1 thinning cited in some comments might not be an
2 allowed use.

3 I think I'll just put my editorial
4 comment on that. At that same time, it's being
5 used for fire blight control and also for fungal
6 control. So, it becomes a little -- that comment
7 may be attributed there are alternate uses at
8 that same time.

9 Discussion?

10 (No audible response.)

11 MR. CHAPMAN: Okay, we have a motion
12 to remove lime sulfur from the national list.

13 The motion was made by Steve and
14 seconded by Emily.

15 A yes vote is to recommend removal, no
16 vote to retain and the voting will start with
17 Asa.

18 MR. BRADMAN: No.

19 DR. GREENWOOD: No.

20 MS. DE LIMA: No.

21 MR. SCHWARTZ: No.

22 MS. ROMERO-BRIONES: No.

1 MS. OAKLEY: No.

2 MS. BAIRD: No.

3 MR. BUIE: No.

4 MS. SWAFFAR: No.

5 MR. RICE: No.

6 MS. BEHAR: No.

7 DR. SEITZ: No.

8 MR. ELA: No.

9 MR. CHAPMAN: The Chair votes no.

10 MR. RICE: That's zero yes, 15 no,
11 zero absent.

12 MR. CHAPMAN: Motion fails.

13 Steve?

14 MR. ELA: Sucrose octanoate esters.

15 Clarissa?

16 DR. MATHEWS: At Section 205.601(e) is
17 insecticides, including acaricides or mite
18 control. The listing is sucrose octanoate
19 esters, CAS Number 42922-74-7 and 58064-47-4.

20 In accordance with approved labeling.

21 MR. ELA: Sue?

22 MS. BAIRD: Yes, we had a pretty good

1 discussion on this for livestock. It is, though
2 we are addressing it now for crops as an
3 insecticide, it has been approved by EPA under
4 registration two different numbers to control
5 soft belly insects.

6 It's permitted as a foliar spray,
7 fields, greenhouses, nurseries and any type of
8 agricultural crop.

9 It biodegrades rapidly. It's not
10 toxic to mammals or any targeted organisms. The
11 amount used will not substantially increase the
12 amounts of the esters in the environment. It's
13 nontoxic to honeybees and many beneficial
14 insects. There's no phytotoxicity in crops.

15 We've got no comments this time for
16 fall for the use or against the use of SOEs in
17 crops.

18 In spring, we did have four comments
19 that said that they used it as effective tool for
20 rotation with other pest control materials that
21 are allowed in organic production.

22 So, I'm not clear if, and this is a

1 Harriet question, when you said there was nothing
2 -- no products registered if that was strictly
3 for miticide for insects for bees or if this also
4 for crop production.

5 MS. BEHAR: No, and Clarissa did send
6 me the deregistration determination. I don't
7 know the exact form name but it has been
8 deregistered for both livestock varroa and on
9 crops.

10 It was the same manufacturer and they
11 removed their request for that.

12 But, there was one public commenter
13 that I -- the Organic Produce Wholesalers
14 Coalition did support the use and both in this
15 comment and the previous.

16 And so, when I found out that both of
17 the products were no longer registered, I went
18 back to the public comments and just to be open
19 and frank, I am friends with Lynn Coody and so I
20 contacted her. And, we had a kind of back and
21 forth of why did they support the use?

22 And, she said that they had sent out a

1 survey to their producers, but that was for the
2 previous sunset. It wasn't a new survey on that
3 because it's been deregistered so they wouldn't
4 be using it. Yes, they wouldn't be using it now.

5 But, they just said for a tool. But
6 it has a lot of the same issue with it's not EPA
7 registered.

8 I don't know, ESMA didn't do research
9 into if they're using it internationally, but it
10 is not on the EU list and I don't know about
11 Canada.

12 MR. ELA: Emily?

13 MS. OAKLEY: There were also public
14 comments from another commenter that refers to
15 the EPA delisting. I just wanted to point that
16 out.

17 MR. ELA: Clarissa, do you have
18 anything to add to that delisting?

19 DR. MATHEWS: Only that I did also
20 confirm directly with EPA.

21 MR. ELA: So, if there -- so, there is
22 no listing for it on crops?

1 DR. MATHEWS: At the time of my
2 clarification, there was no registered product.

3 MR. ELA: Thank you for -- and thank
4 you for checking on that.

5 DR. MATHEWS: You're welcome.

6 MR. ELA: That's really useful
7 information.

8 Other comments?

9 MR. BRADMAN: Well, I just had a
10 question, if it's not registered for EPA, I don't
11 know if it's required to have a food tolerance.

12 It seems to me like we shouldn't --
13 you can't even have it on our list if it's not
14 registered.

15 MR. ELA: I think that you see the
16 vote on the Subcommittee was to not delist it,
17 this information came out since we voted on it.
18 And, I would at least I voted for it -- I voted
19 to not delist it originally. My vote has changed
20 based on that. I don't think we can have a
21 material on the list that has no use.

22 Emily?

1 MS. OAKLEY: Same here.

2 MR. ELA: Harriet?

3 MS. BEHAR: Having used this material,
4 I will attest to it being completely miserable.

5 (Laughter.)

6 MR. ELA: Anybody else have comments?

7 Lisa, you have a very quizzical look
8 on your face. I don't mean to call on you, but
9 you -- can we clarify something?

10 MS. DE LIMA: So, is this same
11 situation in livestock where it's the same exact
12 situation?

13 MR. ELA: Pretty much.

14 MS. DE LIMA: Okay.

15 MR. ELA: Does that help?

16 MS. DE LIMA: I want to be consistent
17 in my voting.

18 MR. ELA: Yes.

19 Any other discussion?

20 (No audible response.)

21 MR. ELA: Tom? We didn't give you as
22 much time as you needed, did we?

1 MR. CHAPMAN: Yes, so I'm trying to
2 research quickly online about tolerance levels
3 for sucrose octanoate esters. I don't know if
4 it's a true statement whether or not the
5 tolerance has been removed from the --

6 MR. ELA: Okay.

7 MR. CHAPMAN: So, just something to
8 keep in mind, but I don't know if that's going to
9 change the way anyone votes on this item.

10 Don't use us as the record for making
11 that determination, I guess. We never should use
12 this for the record anyway.

13 All right, so we have a motion to
14 remove sucrose octanoate esters. It's a seconded
15 motion from the Subcommittee.

16 The motion was made by Sue and
17 seconded by Jesse.

18 A yes vote is to recommend delisting
19 this material, a no vote is to recommend its
20 listing remains and the voting will start with
21 Rick.

22 DR. GREENWOOD: Yes.

1 MS. DE LIMA: No.

2 MR. SCHWARTZ: No.

3 MS. ROMERO-BRIONES: Yes.

4 MS. OAKLEY: Yes.

5 MS. BAIRD: I'm going to say no for
6 the same reason I said, it may -- just because
7 it's not currently got a product listed, maybe in
8 the future it will be.

9 MR. BUIE: No.

10 MS. SWAFFAR: Yes.

11 MR. RICE: Yes.

12 MS. BEHAR: Yes.

13 DR. SEITZ: Yes.

14 MR. MORTENSEN: Yes.

15 MR. ELA: Yes.

16 MR. BRADMAN: Yes.

17 MR. CHAPMAN: Chair votes yes.

18 MR. RICE: That's 11 yes, 4 no, zero
19 absent.

20 MR. CHAPMAN: The motion passes.

21 Steve?

22 MR. ELA: Okay, hydrated lime.

1 DR. MATHEWS: Section 205.601(i) as
2 plant disease control. The listing is hydrated
3 lime.

4 MR. ELA: Dave?

5 MR. MORTENSEN: Okay, hydrated lime,
6 yes, this has been around for a long time. It's
7 centrally important for its use as a foliar
8 application for disease management in all sorts
9 of vegetable and fruit crops.

10 It is necessary, or a central
11 ingredient in something called the Bordeaux mix
12 where it's mixed with copper sulfate for
13 applications.

14 There has been strong support. It's
15 widely used.

16 During the course of the Subcommittee
17 discussions, I think we collectively saw this as
18 something that is a widely used quite safe
19 product.

20 And, the comments that we received by
21 and large supported that.

22 MR. ELA: Discussion? Comments?

1 (No audible response.)

2 MR. ELA: Tom?

3 MR. CHAPMAN: So, we have a motion to
4 remove hydrated lime from the national list.

5 The motion was made by Dave and
6 seconded by Jesse.

7 A yes vote is to remove, a no vote is
8 to retain and the voting will start with Lisa.

9 MS. DE LIMA: No.

10 MR. SCHWARTZ: No.

11 MS. ROMERO-BRIONES: No.

12 MS. OAKLEY: No.

13 MS. BAIRD: No.

14 MR. BUIE: No.

15 MS. SWAFFAR: No.

16 MR. RICE: No.

17 MS. BEHAR: No.

18 DR. SEITZ: No.

19 MR. MORTENSEN: No.

20 MR. ELA: No.

21 MR. BRADMAN: No.

22 DR. GREENWOOD: No.

1 MR. CHAPMAN: The Chair votes no.

2 MR. RICE: That's zero yes, 15 no,
3 zero absent.

4 MR. CHAPMAN: The motion fails.
5 Steve?

6 MR. ELA: Liquid fish products.
7 Clarissa?

8 DR. MATHEWS: Section 205.601(j) is
9 plant or soil amendments, the listing is liquid
10 fish products. Can be pH adjusted with sulfuric,
11 citric or phosphoric acid.

12 The amount of acid used shall not
13 exceed the minimum needed to lower the pH to 3.5.

14 RM. ELA: Dave?

15 MR. BRADMAN: So, liquid fish
16 products, I think really the comments and input
17 we have is this fall really reflects some of the
18 discussions that we had last spring.

19 There's vast support for relisting of
20 liquid products.

21 Based on my review of comments and
22 users, we probably have thousands represented

1 just related to organizations and individuals
2 that submitted comments.

3 There was also expression of concern
4 about the issue that came up last year or last
5 spring about the use of wild fish stock as sole
6 source material for production of liquid fish
7 products and support for a work agenda and a
8 review of that, perhaps not as complicated but
9 similar to the issues that are going on around
10 marine materials.

11 You know, my sense is that this is an
12 essential and important material and that I know
13 I will be supporting its relisting. But, I would
14 like to participate in, and I hope that, as a
15 Board, that we can all participate in a work
16 agenda from the program to review the use of the
17 source fish stocks for this material.

18 MR. ELA: And, I would like to
19 clarify, the program has approved that work
20 agenda for the Committee. So, it is on our list.

21 Emily?

22 MS. OAKLEY: Just to clarify, I was

1 the abstention and that was before we knew that
2 this material would be -- or this item would be
3 added to our work agenda.

4 So, it was sort of waiting for that.
5 So, my abstention will be a no vote. And I thank
6 the program for allowing us to work on this
7 issue, I'm looking forward to it.

8 MR. ELA: Harriet?

9 MS. BEHAR: There was also some
10 discussion by a manufacturer about the pH and
11 wanting some clarification about where the
12 process, and so I'm not sure, you know, if we'll
13 work on that or not. But I just wanted to
14 recognize that that was brought to our attention.

15 MR. ELA: So, at the Tucson meeting,
16 we received a large amount of public comment.
17 The NOP had asked us to clarify about the pH
18 requirement of 3.5, whether that was throughout
19 the whole process as the fish product is being
20 made or it was a final process.

21 We heard a fair amount of public
22 testimony from that in Tucson, and the take-away,

1 we haven't talked about it extensively in the
2 Committee, but that to minimize the use of
3 phosphoric acid in that product, the best way was
4 to have a final pH of 3.5. And that also makes
5 the certification easier because the certifier
6 doesn't have to be there through the whole
7 process.

8 I think the manufacturer, we discussed
9 that at the meeting, but the manufacturer was
10 asking for some clarification on that.

11 The Crops Committee will be making --
12 will forward a note to the NOP that that is our
13 opinion. We'll put it in writing and then the
14 NOP can act on it as such to the manufacturer.
15 But at least we'll make that clearer rather than
16 just letting that drop.

17 Other discussion? Ashley?

18 MS. SWAFFAR: I just want to say that
19 I think this is a very critical material for a
20 lot of smaller farms, especially vegetable farms.
21 So I highly support this item.

22 MR. ELA: All right. Tom?

1 MR. CHAPMAN: All right, we have a
2 motion to remove liquid fish products from the
3 national list. The motion was made by Asa and
4 seconded by Jesse.

5 A yes vote is to remove, a no vote to
6 relist, and the voting will start with Eric.

7 MR. SCHWARTZ: No.

8 MS. ROMERO-BRIONES: No.

9 MS. OAKLEY: No.

10 MS. BAIRD: No.

11 MR. BUIE: No.

12 MS. SWAFFAR: No.

13 MR. RICE: No.

14 MS. BEHAR: No.

15 DR. SEITZ: No.

16 MR. MORTENSEN: No.

17 MR. ELA: No.

18 MR. BRADMAN: No.

19 DR. GREENWOOD: No.

20 MS. DE LIMA: No.

21 MR. CHAPMAN: Chair votes no.

22 MR. RICE: That's zero yes, 15 no,

1 zero absent.

2 MR. CHAPMAN: The motion fails.

3 Steve?

4 MR. ELA: Sulfurous acid. Clarissa?

5 DR. MATHEWS: That's Section

6 205.601(j) as plant or soil amendments. The
7 listing is sulfurous acid, CAS Number 7782-99-2
8 for on-farm generation of substance utilizing 99
9 percent purity elemental sulfur per paragraph
10 (j)(2) of this section.

11 MR. ELA: All right, this is my lead.
12 Basically, sulfur is burned to create an acid to
13 acidify the irrigation water and is used on farms
14 with high pH soils.

15 Almost everybody wrote in to support
16 it, noting that if irrigation water has a high
17 pH, if it's left untreated it causes calcium
18 carbonate buildup on the leaf and fruit surface.
19 Lowering that pH helps reduce that buildup and
20 gives better nutrient uptake in the soils.

21 The one negative comment that opposed
22 the relisting of this saying that the

1 accumulation of carbonates and bicarbonates
2 through irrigation water is in more arid regions
3 and that actually is just farmland that should
4 not be farmed to start with.

5 But, in general, with the exception of
6 that comment, the comments were in favor that
7 this benefitted growers in having to reduce some
8 of their nutrient applications because of
9 adjusting the pH.

10 Discussion? Harriet, do you have a
11 comment?

12 MS. BEHAR: I was surprised to see
13 that there were only 12 CCOF members that listed
14 this product, but I'm not sure that -- I think
15 most people who are running it in irrigation are
16 probably using the elemental sulfur or doing it
17 as a powder in the soil. But I will vote to keep
18 this on the National List, but it did surprise me
19 that it wasn't more in use.

20 MR. ELA: Dave?

21 MR. MORTENSEN: Steve, I was just
22 curious if, in looking at this, you came across

1 how the sulfurous acid is actually introduced
2 into the water stream?

3 And the reason I ask is, where I
4 worked in Nebraska, it was always a concern about
5 backflow where you tap in whatever you're
6 applying and that it could actually go the other
7 way by mistake with faulty equipment.

8 MR. ELA: So, in answer to that
9 question, the acid is created by spraying water
10 through the smoke when you burn the sulfur, and
11 then that is pumped into the -- or injected into
12 the pipeline.

13 So I think your concerns with
14 backflow, one usually only reduces the pH to
15 something around 6, so we're not talking highly
16 acidified water after it's injected. So it's,
17 you know, essentially safe; it's not like
18 injecting a pesticide into it.

19 So I don't know if that answers your
20 question but --

21 MR. MORTENSEN: It does. Thanks,
22 Steve.

1 MR. ELA: And, in response to
2 Harriet's questions, I know we have a number of
3 growers in our area that use them that we would
4 not have seen, organic growers, and it makes a
5 significant difference in their like iron
6 chlorosis, for example.

7 It's actually, full disclosure,
8 something I may install next year, assuming it's
9 still on the list. For those growers that use
10 it, it seems to be very effective and reduces
11 their other nutrient problems.

12 Scott?

13 MR. RICE: Yeah, I just echo that.
14 It's a wide use in the tree fruit industry in the
15 northwest and elsewhere.

16 MR. ELA: Any other discussion?

17 Tom?

18 MR. CHAPMAN: All right, we have a
19 motion to remove sulfurous acid from the National
20 List. The motion was made by Steve and seconded
21 by Harriet.

22 A yes vote is to remove, a no vote is

1 to retain, and the voting will start with A-dae.

2 MS. ROMERO-BRIONES: No.

3 MS. OAKLEY: No.

4 MS. BAIRD: No.

5 MR. BUIE: No.

6 MS. BEHAR: No.

7 DR. SEITZ: No.

8 MR. MORTENSEN: No.

9 MR. ELA; No.

10 MR. BRADMAN: No.

11 DR. GREENWOOD: No.

12 MS. DE LIMA: No.

13 MR. SCHWARTZ: No.

14 MR. CHAPMAN: Chair votes no.

15 MR. RICE: That's zero yes, 15 no, and
16 zero absent.

17 MR. CHAPMAN: The motion fails.

18 Steve?

19 MR. ELA: All right, a vote we've had
20 international interest in, ethylene. Clarissa?

21 DR. MATHEWS: Section 205.601(k) as
22 plant growth regulators. The listing is ethylene

1 gas for regulation of pineapple flowering.

2 MR. ELA: Emily?

3 MS. OAKLEY: Yep, so, it's used to
4 induce uniform flowering in pineapples. And it's
5 important to note this is pineapple only.

6 It's an essential tool for commercial
7 production of pineapples for the export market,
8 as we've heard from the numerous producers and
9 producer groups and others, both on the webinar,
10 in person, and in the written comments.

11 Commenters stated that no viable
12 alternatives exist and that without it it would
13 be impossible to achieve the uniform ripening
14 necessary for timing the harvest for food
15 shipment.

16 We heard both in the spring, and was
17 also heard in the 2015 review in Stowe, and again
18 this time, that, by one commenter at least, that
19 the material does not fit an OFPA criteria and it
20 is not essential for the production of the crop,
21 but rather is employed for economic reasons.

22 I would say that I think that it is a

1 tricky material and that it is truly being
2 applied for economic purposes. However, this
3 time around, we did hear public comment and
4 received significant written comment suggesting
5 that flowering reduction reduces pest damage by
6 allowing for uniform application of pesticides
7 and minimizes worker entry into the field, which
8 thereby also reduces disease introduction and
9 damage to the crop.

10 Are there any questions or comments?

11 MR. ELA: Harriet?

12 MS. BEHAR: So, that was very
13 important to me when we did hear the public
14 comment that when you have a flowering, you know,
15 intermittently throughout the field, it attracts
16 the pests and damages the younger pineapple. And
17 so it's not just being able to send the product
18 to market, but actually help save the crop.

19 I do say I have some concern about the
20 monoculture of that crop, that it's pineapple
21 after pineapple after pineapple. But it does
22 appear that the growers are doing a good cover

1 crop, and a nitrogen fixing one at that, in
2 between.

3 But, for just kind of longer term
4 sustainability, I hope that they think about
5 doing a little bit more rotation, because I don't
6 know that much about pineapple, but I do know
7 that if you grow the same crop in a field year
8 after year after year, even with a three to six
9 month break, something will probably come in, an
10 insect that will over -- you know, they live in
11 the soil, or disease or whatever.

12 So, that has nothing to do with
13 ethylene, it just has to do with pineapple. One
14 of the essential food groups, along with
15 chocolate and wine.

16 MR. ELA: Other comments? I do want
17 to reiterate thank you to the Costa Rican
18 contingent for making the long trip. Your
19 testimony is very important, just like any grower
20 and any other stakeholder. And I hope to heck
21 that you get to do something fun here beside sit
22 in a convention room for three days. So, please

1 enjoy your time in our country.

2 Vote?

3 MR. CHAPMAN: Please enjoy the fine
4 warm weather in the state of Minnesota in
5 October.

6 All right, we have a motion to remove
7 ethylene gas from the National List. The motion
8 was made by Emily and seconded by Harriet.

9 A yes vote is to remove, a no vote is
10 to retain. And the voting will start with Emily.

11 MS. OAKLEY: No.

12 MS. BAIRD: No.

13 MR. BAIRD: No.

14 MS. SWAFFAR: No.

15 MR. RICE: No.

16 MS. BEHAR: No.

17 DR. SEITZ: No.

18 MR. MORTENSEN: No.

19 MR. ELA: No.

20 MR. BRADMAN: No.

21 DR. GREENWOOD: No.

22 MS. DE LIMA: No.

1 MR. SCHWARTZ: No.

2 MS. ROMERO-BRIONES: No.

3 MR. CHAPMAN: Chair votes no.

4 MR. RICE: That's zero yes, 15 no,
5 zero absent.

6 MR. CHAPMAN: The motion fails. The
7 Costa Ricans are happy.

8 (Laughter.)

9 (Applause.)

10 MR. CHAPMAN: Steve?

11 MR. ELA: Microcrystalline cheesewax.
12 Clarissa?

13 DR. MATHEWS: Section 205.601(o) as
14 production aids. The listing is microcrystalline
15 cheesewax, CAS Number 64742-42-3, 80090-03-08,
16 and 8002-74-2 for use in log-grown mushroom
17 production, must be made without either ethylene,
18 propylene, copolymer, or synthetic colors.

19 MR. ELA: Sue?

20 MS. BAIRD: Yes, microcrystalline wax
21 is a type of wax that's derived from refining
22 heavy petroleum distillates during the petroleum

1 refining process. It's recovered from crude oil
2 through a series of filtration and on and on.

3 And it's used in mushroom production
4 to seal the plug holes in shiitake logs in which
5 the spawn is actually inserted. It is petroleum-
6 based, and even though used in small quantities,
7 it does not biodegrade in the environment.

8 We had heard, in the spring, public
9 comments that there were natural soy waxes from
10 domestically produced non-GMO soybeans that was
11 now available. And, based on that information,
12 and because that survey was done with a larger,
13 more commercial mushroom production, there was
14 some suggestion that perhaps it was no longer
15 needed.

16 But, since that point, we've heard
17 from smaller shiitake mushroom growers who're
18 saying, yes, we absolutely do use it, and, in
19 fact, QCS said that they disagreed with the
20 subcommittee's statement that there were
21 alternatives such as natural soy-based wax that
22 were available to replace this material.

1 And their statement was that every
2 soy-based wax that they've reviewed for use in
3 organic production comes from hydrogenated soy
4 oil, which is synthetic and prohibited in organic
5 production. They said that their certified
6 mushroom producers that are growing on shiitakes
7 are, in fact, using microcrystalline cheesewaxes.
8 And they said they'd conducted internal review
9 for three separate microcrystalline cheesewax
10 products and they've found that they were
11 compliant to 601.

12 MR. ELA: Discussion? Harriet?

13 MS. BEHAR: So, there was a producer
14 who wrote quite extensively in favor of this
15 material. It actually happens to be someone that
16 I know and someone that I inspected.

17 He mentioned he sells a lot to
18 mushroom growers, and he said that he sells, on
19 average, four tons of clear cheesewax to growers
20 each year. This represents 80,000 logs a year
21 that are being treated with this microcrystalline
22 cheesewax.

1 And probably you've heard that I was
2 not that favorable to this material, because I
3 disagree with the TR in how rapidly it
4 biodegrades, because I have seen it out on the
5 forest floor when it looks like it's been there
6 for at least three to four years, because the
7 logs that it was in are just about gone and they
8 get all this wax. But I don't want to take away
9 a tool.

10 He also talks about the fact that it's
11 a clear wax and that you can then see underneath
12 how the spawn is growing and you can kind of
13 manage your production that way. So I am going
14 to vote for this material.

15 MR. ELA: Emily?

16 MS. OAKLEY: I can't remember if I'm
17 one of the yeses or the abstain, but I just
18 wanted to clarify my change of position.

19 We did not receive public comment to
20 the extent that we did this time around in the
21 spring, which underscores the benefit of having
22 these materials before stakeholders for two

1 meetings. So, thanks to those who reached out to
2 their growers and submitted comment to us.

3 MR. ELA: Asa?

4 MR. BRADMAN: I just have a question
5 for clarification about the soy wax option. I
6 understand that's hydrogenated, it would be
7 synthetic, and would need to be on the list.

8 If it were to be on the list, and I
9 think there's some history I might not be fully
10 versed on, but it looks like there may have been
11 or could be a petition to list it. And then
12 would that provide an alternative to the
13 microcrystalline cheesewax?

14 MS. BAIRD: Yeah, according to QCS.
15 And I have not researched this, but they said
16 that everyone that they had researched, they were
17 a synthetic-based soy. And, therefore, it would
18 have to be petitioned to be on the list.

19 MR. ELA: Emily?

20 MS. OAKLEY: Yeah, we did have this
21 petition before us in 2016, and that was a very
22 painful, painful meeting for many reasons. And

1 that vote was actually, I thought, not the
2 awesomest, and so we did not successfully vote to
3 add that to the list.

4 MR. ELA: Tom?

5 MR. CHAPMAN: Yeah, I want to remind
6 folks that just being bio-based doesn't mean
7 biodegradable. And on the other material, I
8 don't think there was sufficient research done on
9 it to come to that conclusion at the time it was
10 brought forward before the full Board.

11 MR. ELA: Emily?

12 MS. OAKLEY: Yeah, to elaborate on
13 Tom's point, I think there were some concerns
14 that a TR wasn't received. Perhaps it's time to
15 re-petition that and request a TR.

16 MR. ELA: Other discussion? I mean,
17 we can always talk FDA wants a five log reduction
18 and if we keep this product on we have a no log
19 reduction.

20 Anybody else? Tom?

21 MR. CHAPMAN: Who doesn't like log
22 reduction jokes?

1 All right, the motion to remove
2 microcrystalline cheesewax from the national
3 list. The motion was made by Sue and seconded by
4 Emily.

5 This is a motion to remove so a yes
6 vote is to remove, a no vote is to retain. And
7 the voting will start with Sue.

8 MS. BAIRD: No.

9 MR. BUIE: No.

10 MS. SWAFFAR: No.

11 MR. RICE: No.

12 MS. BEHAR: No.

13 DR. SEITZ: No.

14 MR. MORTENSEN: No.

15 MR. ELA: No.

16 MR. BRADMAN: No.

17 DR. GREENWOOD: No.

18 MS. DE LIMA: No.

19 MR. SCHWARTZ: No.

20 MS. ROMERO-BRIONES: No.

21 MS. OAKLEY: No.

22 MR. CHAPMAN: Chair votes no.

1 MR. RICE: That's zero yes, 15 no,
2 zero absent.

3 MR. CHAPMAN: I swore I heard 17 no's.
4 (Laughter.)

5 MR. CHAPMAN: The motion fails.
6 Steve?

7 MR. ELA: Potassium chloride.
8 Clarissa?

9 DR. MATHEWS: In Section 205.602, non-
10 synthetic substances prohibited for use in
11 organic crop production. At paragraph (e) the
12 listing is potassium chloride unless derived from
13 a mined source and applied in a manner that
14 minimizes chloride accumulation in the soil.

15 MR. ELA: Harriet?

16 MS. BEHAR: So, this is a prohibited
17 natural, just so people understand that.

18 There was public comment. The
19 certifiers stated that the annotation, which is
20 an important one, is verified at inspection and
21 during review. Many see it as necessary but feel
22 that that annotation is important.

1 In the first round of comments, one
2 certifier noted that it's difficult to find
3 potassium sulfate, which is not this material,
4 but that there's issue with dust suppressants and
5 that some certifiers allow all dust suppressants
6 and others look at them and don't allow them. So
7 they thought that that should be looked at.

8 CCOF said that there were close to 50
9 producers using it, and there was strong support
10 by public comment just to relist the material on
11 205.602.

12 MR. ELA: Discussion? Tom?

13 MR. CHAPMAN: All right, so this is a
14 motion to remove potassium chloride from the
15 national list. The motion was made by Harriet
16 and seconded by Emily.

17 A yes vote is to remove, a no vote is
18 to retain the listing. And the voting with start
19 with Jesse.

20 MR. BUIE: No.

21 MR. RICE: No.

22 MS. BEHAR: No.

1 DR. SEITZ: No.

2 MR. MORTENSEN: No.

3 MR. ELA: No.

4 MR. BRADMAN: No.

5 DR. GREENWOOD: No.

6 MS. DE LIMA: No.

7 MR. SCHWARTZ: No.

8 MS. ROMERO-BRIONES: No.

9 MS. OAKLEY; No.

10 MS. BAIRD: No.

11 MS. SWAFFAR: No.

12 MR. CHAPMAN: Chair votes no.

13 MR. RICE: That was zero yes, 15 no,
14 zero absent.

15 MR. CHAPMAN: The motion fails. And
16 that concludes 2020 sunset.

17 (Applause.)

18 MR. CHAPMAN: I would propose that we
19 go through a couple of these and then we'll
20 break.

21 MR. ELA: Yeah, as a note to the
22 Board, it's 3:35 and you can pay attention to

1 your agendas where that puts us. So, obviously,
2 on these proposals, we want to have a robust
3 discussion, but we'll see if we can keep it
4 focused while at the same time getting the
5 information out that needs to be brought out.

6 So, if we could start with allyl
7 isothiocyanate, also known as AITC. That is
8 Jesse's material.

9 MR. BUIE: Allyl isothiocyanate -- and
10 heretofore we'll call it AITC -- we received an
11 addendum to this particular material after we had
12 voted. The vote was zero yes and six to not list
13 it. And I would like to send this back to the
14 subcommittee for further deliberation for the
15 following reasons.

16 After reviewing the addendum that was
17 submitted, many of the issues that we were
18 concerned about have been dealt with. And I
19 think that we, as a subcommittee, ought to look
20 further into that.

21 For an example, TR lines 607-608
22 discusses AITC drip would therefore be

1 problematic for both the beneficial soil fungi
2 and associated plants. The addendum has
3 information that would deal with that particular
4 concern that we have.

5 Also, another one was lines 451 and
6 452, inhalation toxicology data for AITC and its
7 degradance are not available. Well, that
8 information has been provided in the response.

9 And also another response -- and there
10 were 16 of these that were submitted that I feel
11 that we should look further into before making a
12 decision on this particular material.

13 TR 459 to 460 states that the physical
14 properties of AITC are similar to those of the
15 conventional soil fumigant MITC, and indicates
16 much of the TR referred to MITC for its data.

17 And the respondent showed that this comparison,
18 that MITC was really four times higher than AITC.

19 And there are 16 of these. So, as a
20 result of this new information that we received,
21 I'd like to make a motion to send this back.

22 Any discussion?

1 MR. ELA: I think that goes to the
2 Chair if there's a motion, doesn't it?

3 MR. CHAPMAN: There is a motion, is
4 there a second? There's a second from Asa, and
5 we can discuss the motion.

6 MR. ELA: Now we can have discussion;
7 we couldn't before. So, Emily?

8 MS. OAKLEY: Thank you, Jesse. I hear
9 what you're saying but I don't share your
10 concerns about the petition addendum changing my
11 position on this material.

12 I rely on the technical report more
13 than I would rely on the petitioner's differing
14 information from the technical report, simply
15 because the technical report is coming from an
16 unbiased third-party, whereas the addendum is
17 coming from the petitioner who has an interest in
18 seeing the material approved.

19 That being said, I don't think that
20 the concerns that I had to originally reject this
21 material would be changed by sending this back to
22 the Committee. So I would like to proceed with

1 the vote and urge those here to vote to keep it
2 on our list and vote to remove it.

3 MR. ELA: Tom?

4 MR. CHAPMAN: I was swayed by some of
5 the public comment here to potentially review
6 this substance as a treatment for nursery stock.
7 And I know that once we've reviewed that my vote
8 may not, you know, turn to approving this
9 substance.

10 But I would like to at least have a
11 chance to explore that as an option and get
12 further information so I support sending this
13 back to the subcommittee.

14 MR. ELA: Lisa?

15 MS. DE LIMA: I was going to ask the
16 same question the rest of the folks on Crops,
17 because I wouldn't want to send it back for the
18 reasons that Jesse had said, agreeing with Emily.
19 But I was interested in other people on Crops and
20 what they were thinking as far as considering it
21 for the nursery stock.

22 MR. ELA: I can answer that. Scott,

1 you had your hand up, too, and I want to respect
2 what you want to say, and then we'll definitely
3 answer that.

4 MR. RICE: I express my interest in
5 seeing it have that limited use as well if it's
6 potentially beneficial to the nursery stock
7 industry, because we see a lot of non-organic
8 perennial tree fruit and it'd be great, if this
9 were a resource, to have it as a tool.

10 MR. ELA: So, I'll put my two cents
11 in. I tend to follow more with Emily on this
12 one. While I agree, we desperately need a
13 phytosanitary material for the production of
14 nursery stock, I don't agree that we should use a
15 broad scale, broad spectrum fumigant. You know,
16 that's a very magic bullet conventional approach.
17 And just because it's naturally occurring does
18 mean that it does not still have dramatic effects
19 on the soil.

20 As I become more versed as an organic
21 grower, I mean, I switched from conventional.
22 When we first switched, we tended to look, you

1 know, for those bullets, like it's the
2 progression that goes in. Now, I look at it very
3 much as a systems approach.

4 And I believe that when we apply these
5 broad spectrum things, we really damage,
6 permanently damage they system. Or maybe I
7 shouldn't say permanently, but more than just a
8 while.

9 And so I guess I'm personally not in
10 favor, even though it means that we may not have
11 that phytosanitary restriction. But I'd rather
12 call a spade a spade. If we're going to do a
13 broad scale fumigation, call it conventional and
14 go ahead and use those conventional ones, versus
15 putting the organic material in that really is
16 doing the same thing and, to me, causing harm to
17 that soil, biota, and ecosystem.

18 And I don't like calling that organic
19 because I don't think it's in that -- I don't
20 think it's in the spirit or in the belief. So, I
21 don't know if that makes sense, but that's my two
22 cents.

1 Asa, and then I'll go to Sue.

2 MR. BRADMAN: I guess I would like a
3 little clarification. If this were one of the
4 materials used for phytosanitary purposes for
5 nursery stock, is that still an application to
6 soil? Or is that, say, after harvest and before
7 shipping or something like that?

8 Because what I'm interested in is -- I
9 don't know if this is the material, but maybe
10 this also opens up a discussion on even the
11 concept of, you know, an organic approach to
12 producing nursery stock from ground zero. It's
13 almost like the day-old chick issue: can we take
14 this and go back?

15 And I don't know if this is the
16 material for that, but, if it's not used in the
17 soil, is there an opportunity here to have a
18 discussion that might move that issue forward?

19 MR. ELA: Sue?

20 MR. BRADMAN: That's a question to
21 everyone.

22 MS. BAIRD: I guess my -- and I truly

1 second the concerns of fumigants. I just don't
2 like them. But if we don't bring this back and
3 at least explore it for nursery stock -- and I
4 would be open to just limiting to nursery -- if
5 we don't do that, are we going to stop the
6 prevailing methobromide and some of those broad
7 spectrums that we have today?

8 MR. ELA: Dave?

9 MR. MORTENSEN: Yeah, and I guess
10 because I think Tom asked what the subcommittee
11 thought -- or Lisa did, sorry. My view aligns
12 very closely with Steve's and Emily's on this. I
13 really would like to see us be moving in the
14 direction of a systems approach to this kind of
15 management, which led me to ask some questions
16 about the cover crop use in fields. There are
17 cover crops actually that produce a very similar
18 compound to this one.

19 That's not addressing the nursery part
20 of this, but I just think that we really need to
21 be pushing ourselves to be looking at systems
22 approaches rather than these remedial chemical-

1 by-chemical solutions to the problem.

2 MR. ELA: Emily?

3 MS. OAKLEY: Yeah, I want to echo
4 that, especially in terms of the cover crops. I
5 mean, that is the beauty of organic. We are
6 looking at the whole agro ecosystem and we are
7 taking approaches that avoid the use of
8 chemicals.

9 And so I just want to read to you the
10 first paragraph on the last page of this.
11 Mustard seed, meals, mustard green, manures,
12 plowed under cover crops, Regalia, an approved
13 OMRI material, are biopesticides that are
14 available; SoilGard, a fungal biocontrol
15 material; Serenade and bionematicide MeloCon are
16 also feasible alternative materials available for
17 use in organic crop production systems.

18 So I don't think there is a lack of
19 other ways of addressing this in a spirit that is
20 more in keeping with OFPA and our rules and the
21 spirit of organic.

22 I really don't think sending this back

1 is going to create an organic nursery stock
2 industry based on this material. And I think it,
3 frankly, won't change the ultimate outcome.
4 That's just my personal view on this.

5 MR. ELA: Harriet?

6 MS. BEHAR: So, I'm fairly torn on
7 this material. And my mucus membranes are
8 burning; having made horseradish in a food
9 processor, I'm very familiar with this allyl
10 isothiocyanate.

11 So, but I feel we would be a little
12 bit remiss in not at least exploring it for
13 nursery stock, because, having done the piece on
14 organic seed and nursery stock in strengthening
15 that, I'm painfully aware of how little organic
16 there is. Which means that the nursery stock,
17 not only has it been treated with prohibited
18 fumigants, but it's been treated with pesticides
19 and has not been grown in organic soil and all of
20 those other wonderful things that happen to
21 plants when they are being treated organically.

22 So, I guess I would like to see it go

1 back to subcommittee. And all the points that
2 you're making now could then be brought forward,
3 and perhaps we'll vote it down based on that, but
4 at least we would have given the nursery stock
5 people the due diligence in reviewing it for
6 their special use.

7 MR. ELA: Asa?

8 MR. BRADMAN: I just want to follow up
9 and say I really respect Dave and Emily, the
10 direction you're coming from. And if I were to
11 vote on this petition as presented, I would vote
12 no on it. I would vote it down.

13 I guess, again, I want to repeat my
14 question. And maybe we can't answer that right
15 now, but when we talk about phytosanitation,
16 we're using that word sanitizer again, which, you
17 know, in terms of the processing and food safety,
18 we use these broad spectrum, nasty chemicals that
19 are as bad as, you know, almost anything out
20 there.

21 And for nursery stock, again, I'm not
22 clear, if you were growing it in a nursery stock

1 environment, using it in nursery stock
2 environment, would this be still something you
3 would put in the soil and you would be, you know,
4 raising root stocks in the soil and then, you
5 know, grafting them out? Or is this some sort of
6 post-use that would be more contained?

7 I just want to understand that
8 distinction, because I agree with what you're
9 saying about soil and systems. And I guess, is
10 there a systems approach to phytosanitation? And
11 that's what I don't understand and that's just my
12 kind of agronomic ignorance right now.

13 MR. ELA: So, I think the TR notes
14 that these are soil-borne pathogens and
15 nematodes. And not all nursery stock is sold as
16 bare root. Oftentimes, nursery stock may or may
17 not be sold in containers from plant out.

18 I mean, in fact, many nurseries are
19 going more in that direction away from bare root.
20 So, I don't think you would -- I don't think
21 there's a clear answer to your question.

22 I mean, theoretically, it could be

1 applied to bare root plants, I suppose, and I
2 don't really know the answer to that. But it's
3 still soil-borne diseases that we're looking at.

4 We need to keep moving on. I know I
5 can see confounding looks, but I don't know that
6 more discussion necessarily will help with it.

7 Are we ready to vote on whether to
8 send it back? So, Tom.

9 MR. CHAPMAN: Okay. So, we have a
10 motion to refer allyl isothiocyanate, or AITC,
11 back to the Crops Subcommittee. The motion was
12 made by Jesse and seconded by Asa.

13 This is a simple majority vote and the
14 voting will start with Ashley.

15 MS. SWAFFAR: Yes.

16 MR. RICE: Yes.

17 MS. BEHAR: Yes.

18 DR. SEITZ: No.

19 MR. MORTENSEN: No.

20 MR. ELA: No.

21 MR. BRADMAN: Yes.

22 DR. GREENWOOD: Yes.

1 MS. DE LIMA: Yes.

2 MR. SCHWARTZ: Yes.

3 MS. ROMERO-BRIONES: No.

4 MS. OAKLEY: No.

5 MS. BAIRD: Yes.

6 MR. BUIE: Yes.

7 MR. CHAPMAN: The Chair votes yes.

8 MR. RICE: That is 10 yes, 5 no, zero
9 absent.

10 MR. CHAPMAN: All right, it's 10 yes,
11 so that's a majority and the motion prevails. So
12 this item is referred back to the Crops
13 Subcommittee.

14 MR. ELA: Emily, do you have a point
15 of order?

16 MS. OAKLEY: I just want to note that
17 the Crops Subcommittee has a couple of pressing
18 issues on our agenda, so this may not come up as
19 quickly as we might like, but we do have other
20 issues that are before us as well.

21 MR. CHAPMAN: Yeah, I'm going to refer
22 us to the policies and procedures manuals that

1 rank the order of precedence of materials, and
2 petition items are up there with sunset
3 materials. So petitions and sunset materials
4 need to be prioritized by the Subcommittee and
5 then following items from there on out.

6 MR. ELA: All right, do you want us to
7 continue?

8 MR. CHAPMAN: Yeah, let's take break.
9 It is -- what time is it? It is 3:50, so let's
10 plan to do a quick break and come back at 4
11 o'clock for the remainder of the Crops
12 Subcommittee and the closing items.

13 (Whereupon, the above-entitled matter
14 went off the record at 3:51 p.m. and resumed at
15 4:05 p.m.)

16 MR. CHAPMAN: All right, we're back in
17 order. It's 4:05. I'm optimistic we might still
18 be done by 5 o'clock, but some say I'm too
19 optimistic on these things.

20 MR. ELA: So, you'll buy me a beer if
21 we are?

22 (Laughter.)

1 MR. CHAPMAN: I'm going to hand it
2 back over to Steve and we'll resume the crops
3 section.

4 MR. ELA: All right. Another
5 proposal, sodium citrate, which is one of
6 Harriet's materials, proposals. Just as a Chair
7 note, this is a little odd, so, go ahead Harriet
8 and we'll talk about this.

9 MS. BEHAR: Who is a little odd? The
10 proposal or me?

11 MR. ELA: I'm talking about myself.

12 (Laughter.)

13 MS. BEHAR: Okay, so we did receive
14 this petition in July of 2016, and because of its
15 oddness it's taken us until now to really bring
16 it forward.

17 Sodium citrate is a salt derivative of
18 citric acid. It appears on the National List as
19 an approved ingredient in organic processed
20 foods. It's a synthetic.

21 However, the petition was for sodium
22 citrate to be used as an anticoagulant in blood

1 meal. Blood meal does not appear on the National
2 List because it's an approved non-synthetic.

3 We typically do not review processing
4 aids or secondary ingredients in crop inputs.

5 So, we did talk to the National Organic Program
6 about this and they said that we were petitioned
7 and, in order to do our due diligence, we should
8 move forward with a review.

9 So, we put it out for public comment
10 and we did get quite a few responses like why are
11 you reviewing a processing aid in a crop input?

12 There was quite a few commenters who
13 stated that the National Organic Program's
14 Guidance Number 5034-1 should be amended to
15 address the use of processing aids.

16 And, of course, we could work with the
17 program on that.

18 So, we did vote in Subcommittee. We
19 didn't see any reason why it was a problem since
20 it's a allowed in organic food.

21 Other public commenters stated that
22 when we have a natural product or even a

1 synthetic that's a crop input, we should have
2 some overriding determination of what it is, what
3 its standard of identity and then any processing
4 aids would then be approved as part of that
5 standard of identity.

6 The other thing that this opens the
7 door to is that if we approve this, and it is --
8 first of all, we're not really sure where it
9 would be placed on the National List.

10 And, second, would it then cause other
11 materials to either come off the list or not be
12 approved by certifiers because they have not had
13 the processing aids or secondary ingredients
14 reviewed.

15 There was some good public comment
16 about how to maybe review these processing aids,
17 things like if they're allowed in organic food
18 that those should be allowed.

19 If they didn't -- if they just barely
20 had a technical or functional effect in the final
21 product, you know, it wasn't like say a
22 fertilizer that this pumped up the technical

1 effect of that fertilizer.

2 So, there was that type of activity in
3 the public comment.

4 In addition, others warned us against
5 approving it all together because of the
6 precedent that it would add an additional level
7 of review for inputs to farm and crop materials.

8 Where we're not really sure, too, if
9 this is a rare occurrence or if we put this on
10 the list would we get a flood of processing aids
11 or not? We really didn't have the time to go
12 through every material that's both natural and
13 allowed as well as synthetic and on the national
14 list to see if any of them had processing aids
15 that would then perhaps went by the approval this
16 be put on the National List.

17 Lastly, we did discuss this with the
18 program and we will probably have a cover letter
19 either way discussing this issue with them and
20 that they could deal with it on their own as far
21 as deciding to not put it on the National List or
22 work on guidance and update it to deal with this

1 issue.

2 The other thing, too, is I have been
3 referring to this as a quote, unquote, processing
4 aid. But, that is really a term for food and not
5 for inputs, but not really knowing how else to
6 call it, I'm calling it that.

7 But, technically, processing aids are
8 reserved and on the definition of our regulation
9 are for food or livestock feed.

10 MR. ELA: And so, Harriet, I think
11 that probably gives a good background. We --
12 I'll just add in that it, as Committee Chair, we
13 brought this issue up to the Executive Committee.

14 It was decided Executive Committee to
15 go ahead and work on it. And, at this point,
16 even though it's a bit of a quagmire, I feel
17 like, as a Chair, it's my prerogative -- that we
18 should not -- we should act on a petition that's
19 before us and move it along.

20 So, my sense is that pass it and then
21 put it -- pass it on NOP and it's then their
22 choice as to how they wish to deal with something

1 that isn't clear where it goes on the list and
2 probably is a processing aid.

3 MS. BEHAR: Right. And then, just
4 making it clear that the program has heard our
5 concerns that even, if and when, we do pass this,
6 that they understand why we're passing it and
7 that the -- and the implications of its passing.

8 MR. ELA: And, that, yes, and that
9 we're not necessarily advocating that it -- well,
10 that we're cognizant that it's part of a natural
11 material and a processing aid.

12 Discussion?

13 Tom?

14 MR. CHAPMAN: Just to echo that the --
15 I am supportive of this petition but have those
16 same concerns and really ask the program to
17 review the precedence and repercussions of this
18 type of petition before they act on our proposal.

19 MR. ELA: Yes, and I will be putting a
20 recommendation to that effect with the proposal
21 saying that we feel this an awkward situation
22 that we're really not, even though we have no

1 problem with the material, we don't want to set
2 this is a disallowance of what had been natural
3 materials.

4 All right, if there's no further
5 discussion, I think we could, certainly don't
6 want to cut anybody off, but we can move to a
7 vote.

8 MR. CHAPMAN: Okay, so there's two
9 motions, do we need -- there's two motions, I
10 question whether we need this first motion, to be
11 honest, Because it's goes back to the handling
12 listing, but we'll do it for clarity's sake.

13 So, there's a classification motion,
14 motion to classify sodium citrate as a synthetic
15 substance.

16 The motion was made by Harriet and
17 seconded by Emily.

18 A yes vote is to classify the
19 substance as a synthetic, a no vote is to not
20 classify it. The voting will start with Scott.

21 MR. RICE: Sorry, catching up a bit.

22 Yes.

1 MS. BEHAR: Yes.

2 DR. SEITZ: Yes.

3 MR. MORTENSEN: Yes.

4 MR. ELA: Yes.

5 MR. BRADMAN: Yes.

6 DR. GREENWOOD: Yes.

7 MS. DE LIMA: Yes.

8 MR. SCHWARTZ: Yes.

9 MS. ROMERO-BRIONES: Yes.

10 MS. OAKLEY: Yes.

11 MS. BAIRD: Yes.

12 MR. BUIE: Yes.

13 MS. SWAFFAR: Yes.

14 MR. CHAPMAN: Chair votes yes.

15 MR. RICE: That's 15 yes, zero no,

16 zero absent.

17 MR. CHAPMAN: And, now we have a
18 motion to add sodium citrate to 205.601 with the
19 annotation for use as an anticoagulant in the
20 production of blood meal.

21 The motion was made by Harriet and
22 seconded by Emily.

1 A yes vote is to adopt this motion and
2 annotation, a no vote is to reject this
3 recommendation for the listing. And, the voting
4 will start with Harriet.

5 MS. BEHAR: Just wanted to say that it
6 is currently being used and the answer is yes.

7 DR. SEITZ: Yes.

8 MR. MORTENSEN: Yes.

9 DR. GREENWOOD: Yes.

10 MS. DE LIMA: Yes.

11 MR. SCHWARTZ: Yes.

12 MS. ROMERO-BRIONES: Yes.

13 MS. OAKLEY: Yes.

14 MS. BAIRD: Yes.

15 MR. BUIE: Yes.

16 MS. SWAFFAR: Yes.

17 MR. CHAPMAN: Chair votes yes.

18 MR. RICE: Yes.

19 That's 15 yes, zero no, zero absent.

20 MR. CHAPMAN: The motion passes.

21 Steve?

22 MR. ELA: All right, our next petition

1 proposal is natamycin and I'll turn that back
2 over to Harriet.

3 MS. BEHAR: So, another tricky
4 material. The petition was for the National
5 Organic Standards Board to declare this material
6 non-synthetic and then it would be allowed in
7 both crops and livestock.

8 However, we requested a technical
9 review and found that, yes, we agree that it is a
10 non-synthetic, but we're concerned by the use of
11 natamycin as a human health product.

12 There -- it's used in food as a mold
13 inhibitor. It's used in human health to control
14 fungal problems, usually in the eye and yeasts.

15 There has been some resistance
16 according to the technical review of candida to
17 natamycin Because it is used fairly regularly in
18 both breads, especially high moisture bread like
19 English muffins and in things like cold packed
20 cheese food and other cheeses, sliced cheeses and
21 things like that.

22 So, it -- and yogurt. So, it is used

1 a lot in the food supply and there has been shown
2 to be some effect on human biology and bacteria -
3 - I'm sorry, yeast getting resistant to it.

4 So, we decided that we would then
5 accept it as a non-synthetic and put a proposal
6 forward to put it on the National List of
7 prohibited non-synthetics. And so that is our
8 proposal.

9 Public comments, there were quite a
10 few public advocacy groups that absolutely agreed
11 that it should be both on the crops and livestock
12 lists.

13 Most, the Organic Produce Wholesale
14 Coalition again stated they did not wish to have
15 it added to the list -- I mean, to approved.
16 They liked it on the prohibited non-synthetic
17 list.

18 There was discussion about that it
19 could kill beneficial fungi in the environment.
20 And there -- also, that I also reached out,
21 because part of the petitioner's public written
22 comment was some letters from mushroom growers

1 that find it very useful in the control of dry
2 bubble disease.

3 So, I may sound like I know a lot
4 about a lot of things, well, I don't know
5 anything about dry bubble disease in mushrooms.

6 But, I did reach out to Tina Ellor who
7 is a former member of the National Organic
8 Standards Board, a mycologist and knows quite a
9 bit and is in contact with many organic mushroom
10 growers, especially on the East Coast.

11 And, she stated that in their
12 conventional side, they do use natamycin, but
13 they have been able to get by quite well without
14 it on their organic side and that she did not
15 consider it a necessary material for their
16 organic mushroom production.

17 She stated that it's been a
18 challenging couple of years for flies and
19 diseases and that she interviewed some of her
20 growers and it came back that there was not any
21 issue.

22 She said the only products we use

1 fairly routinely are oxidate and a couple of
2 different fly control products that they rotate.

3 They make good management and
4 exclusion their front line defense. And, that's
5 a quote from her email.

6 So, that's where we sit with natamycin
7 with the Subcommittee did discuss this over
8 numerous conference calls and I believe it was a
9 unanimous motion to list it both as a non-
10 synthetic and then put it on 602 as a prohibited
11 non-synthetic substance in crop production.

12 And, as I said before, there were
13 quite a few public commenters that said that we
14 should also add it to the livestock prohibited
15 list because it is used in control of yeasts and
16 molds in livestock feed.

17 MR. ELA: Discussion?

18 Emily?

19 MS. OAKLEY: Yes, I did talk to some
20 organic mushroom growers in my region and they
21 had never heard of this product.

22 The petition did approach me

1 privately, but I can't remember everything that
2 they said. I know that they approached many
3 other people as well.

4 But, I did not hear from those
5 mushroom growers although it was a small sample,
6 any need for this.

7 MR. ELA: Ashley?

8 MS. SWAFFAR: Yes, so I was just
9 looking at the petition. They didn't classify
10 where they would want this petition to, but
11 obviously, they submitted this petition hoping to
12 use it in organic production.

13 What is the precedence of this Board
14 receiving a petition and then putting it on the
15 restricted list? Has it ever been done before,
16 Tom?

17 MR. ELA: Tom?

18 MR. CHAPMAN: I can't answer that
19 directly. What I can say is we often receive
20 petitions and change where we list it or how we
21 list it.

22 An example while we were on the Board

1 was glycerin was petitioned to be removed and
2 then we recommended its placement on 606 with a
3 different annotation.

4 So, that's an example of it comes to
5 us, but then, once it's kind of in our purview,
6 we decide how to handle the substance.

7 MR. ELA: And, I think this one was
8 unique in the sense of -- well, I mean,
9 everything's unique, but interesting in the sense
10 that once we vote that it's non-synthetic, it's
11 out of our purview.

12 I mean, it can be used, because it's a
13 crop substance, it's non-synthetic then it's open
14 field. So, it's a little different than a
15 handling or another substance. So, that -- I
16 think that's where we decided to take kind of the
17 unusual, you know, I don't know if it's rare, but
18 unusual step.

19 Harriet?

20 MS. BEHAR: A couple things. So, I
21 neglected to state, in cheese and breads which
22 are retail packaged. It will appear on the

1 label. So, a consumer will see that natamycin
2 typically with parentheses, a natural mold
3 inhibitor is what's written.

4 However, for what they had asked for
5 used in mushroom production or post-harvest
6 handling of fruits, that would be -- would not
7 appear on any label that a consumer would see.

8 We did ask the petitioner on the
9 webinar and he stated that, if you're in Japan,
10 there'd be a sign, but nothing is required here.

11 And, I think that transparency is
12 extremely important and we don't have that.

13 MR. ELA: Tom?

14 MR. CHAPMAN: I'm going to put Lisa on
15 the spot here in a second, she can decline to
16 answer, but I'm curious to know if MOM's allows
17 this substance in food products and, if not, what
18 was the reasoning behind that ban?

19 MS. DE LIMA: I don't have the
20 reasoning in front of me, but we don't allow it.
21 So, where we would see it crop up are the places
22 that Harriet said, cheese and bread.

1 And, I'm not going to say any names,
2 but I don't think we're the only retailer that
3 does that. I think that's pretty common
4 throughout all the natural --

5 MR. CHAPMAN: Pretty common for the
6 retailers to have the list, but you don't. I
7 cared less about that, I cared more about the
8 reasoning and you don't know that off the top of
9 your head? Okay.

10 MR. ELA: I reached out to another
11 retailer as well. I mean, I asked Lisa first, but
12 I am aware that disallow it in processed foods.

13 And, said, you know, so what would
14 your policy be and, you know, if you don't allow
15 it over here, would you allow it over there?
16 And, they didn't give me a definitive answer.

17 The answer was essentially, it's
18 unlikely we would like it, you know, if we're not
19 allowing it one spot, we're probably not going to
20 allow it in the other spot.

21 MR. CHAPMAN: But, do you know why
22 they're not allowing it?

1 MR. ELA: I could not -- I mean, they
2 didn't give me that answer. It was more just a
3 matter of, you know, even just basic protocol if
4 you don't like it one place, they don't want to
5 get caught in a double standard.

6 So, Harriet?

7 MS. BEHAR: I just want to reiterate,
8 if it's approved as being requested for use, a
9 retailer, unless they reached out to every grower
10 would not be aware and every mushroom producer
11 that it had been used or not.

12 And, of course, it may not be used on
13 every lot every time. So, there would have to be
14 continuous interaction with the suppliers to find
15 out if it had been used.

16 Or, I suppose retailers could just say
17 we don't want you to but there would be no way of
18 checking or verifying that.

19 MR. ELA: And, I'll just say one final
20 comment as a fruit grower who stores fruit and
21 that is up on the list. I mean, I was personally
22 conflicted by this because there are times I

1 could really see it.

2 It would be very useful in my
3 operation. The human health side, though, is
4 even though it may be a very small use, there's
5 precedent on this Board for not using antibiotics
6 that have potential in human use such as some of
7 the light ones, so I feel to be consistent, I
8 have to kind of go with that, even though, from a
9 personal standpoint, this is attractive.

10 One last comment, Tom?

11 MR. CHAPMAN: Yes, I mean, I do want
12 to note that we had that one comment from the
13 pickle producer. It was unclear from those
14 comments where in the supply chain he was looking
15 to have natamycin used.

16 I mean, it was potentially he was
17 looking at a post-harvest application. But, he
18 also talked about the potential of using it in a
19 processing application which, if that was a
20 methodology that he wanted to use it would need to
21 be also on 205.605(a) I believe. It would need
22 to be on one of the lists or it would need to be

1 organic natamycin.

2 So, just to note that that wasn't a
3 full usage if they're using it in the processing
4 portion of their operation.

5 MR. ELA: Yes, it depends where they
6 use it.

7 All right, I think we -- if there's no
8 further substantial discussion, we should move
9 towards the vote.

10 MR. CHAPMAN: All right, so we have a
11 motion to classify natamycin as a non-synthetic
12 substance.

13 The motion is -- comes from the
14 Subcommittee from Harriet and seconded by Emily.

15 A yes vote is to classify natamycin as
16 non-synthetic, a no vote is to not classify the
17 material and the voting will start with Dan.

18 DR. SEITZ: Yes.

19 MR. MORTENSEN: Yes.

20 MR. ELA: Yes.

21 MR. BRADMAN: Yes.

22 DR. GREENWOOD: Yes.

1 MS. DE LIMA: Yes.

2 MR. SCHWARTZ: Yes.

3 MS. ROMERO-BRIONES: Yes.

4 MS. OAKLEY: Yes.

5 MS. BAIRD: Yes.

6 MR. BUIE: Yes.

7 MS. SWAFFAR: Yes.

8 MR. RICE: Yes.

9 MS. BEHAR: Yes.

10 MR. CHAPMAN: The Chair votes yes.

11 MR. RICE: That's 15 yes, zero no,
12 zero absent.

13 MR. CHAPMAN: Motion passes.

14 We also have a motion to add natamycin
15 to 205.602, non-synthetic substances prohibited
16 for use in organic crop production.

17 The motion is -- was made by Harriet
18 and seconded by Emily.

19 So, a vote here would be to recommend
20 the addition of this substance to the prohibited
21 list to prohibit its use in crop production, a no
22 vote would be to not list it which would allow

1 its use in crop production and given the
2 classification.

3 The voting will start with Dave.

4 MR. MORTENSEN: Yes.

5 MR. ELA: Yes.

6 MR. BRADMAN: Yes.

7 DR. GREENWOOD: Yes.

8 MS. DE LIMA: Yes.

9 MR. SCHWARTZ: Yes.

10 MS. ROMERO-BRIONES: Yes.

11 MS. OAKLEY: Yes.

12 MS. BAIRD: Yes.

13 MR. BUIE: Yes.

14 MS. SWAFFAR: Yes.

15 MR. RICE: Yes.

16 MS. BEHAR: Yes.

17 DR. SEITZ: Yes.

18 MR. CHAPMAN: Chair votes yes.

19 MR. RICE: That's 15 yes, zero no,
20 zero absent.

21 MR. CHAPMAN: The motion passes.

22 Steve?

1 MR. ELA: all right, next up, a
2 proposal strengthening the organic seed guidance
3 of October 2018.

4 I'll let Harriet go in to review the
5 public comment. But, there are some changes to
6 this proposal.

7 MS. BEHAR: So, this -- there was many
8 comments on the proposed guidance and many of
9 them did not agree with each other. So, there's
10 still not consensus in the public on the
11 guidance.

12 So, we're going to bring forward those
13 sections of the proposal have been removed.
14 However, there was almost universal public
15 agreement with moving forward on the regulatory
16 language which can be done on its own.

17 So, again, I encourage you to, in the
18 public docket, start writing up your comments so
19 as soon as it's open, because it'll only be for
20 two weeks or so to get us some information on
21 that.

22 I know we're a little pressed for

1 time, but I just want to answer a few of the
2 points that public commenters made.

3 There was some comment about adding,
4 that we timely ordering of seed. And, I
5 specifically did not put that in there because
6 while it's a good practice to order organic seeds
7 as early as possible, there are times when other
8 constraints might prevent that from happening
9 such as many farmers use operating loans obtained
10 in the spring and so they wouldn't have the funds
11 to purchase their seed until spring.

12 In addition, farmers are now being
13 very cautious based upon the extreme weather
14 conditions that we are now facing and they want
15 the flexibility to purchase seed that would then
16 they'd be able to assess their current conditions
17 before they plant.

18 There was concern that the allowance
19 for horticultural growers to review seed
20 catalogues for characteristics that they're
21 looking for was not necessary, that that there
22 was a discussion about you could use variety

1 trials or horticultural growers could be looking
2 at catalogues.

3 The reason for that was is that many
4 horticultural growers could grow 50 to 200
5 varieties like I do on my farm and, if I'm using
6 60 percent non-organic seed, then I would have a
7 heck of a lot of -- I would have to basically
8 have my whole farm be variety trials.

9 So, I was trying to give some
10 allowance to people who are doing small amounts
11 of a whole variety of different things.

12 So, might change that wording a little
13 bit but I just want to be able to -- but the
14 point was is to have them be looking at the
15 characteristics that they are seeking out so they
16 can actually be judging whether or not the
17 organic varieties that are out there are
18 equivalent because they need to be not just
19 looking at the actual variety name, but the
20 equivalency to what they want to grow.

21 There was concern about the number of
22 five seed suppliers need to be found and

1 discussed if they had organic seed or not versus
2 three.

3 There was strong support for up to get
4 five. There was strong support for having none.
5 So, I don't know, we'll find the middle ground on
6 that, but I don't think it will be four.

7 And, I'll see what the best and also
8 the Subcommittee to see if we can find some kind
9 of common ground to encourage the growers to be
10 really seeking out more.

11 And, we have learned out over time --
12 learned over time that requesting organic seed
13 from non-organic seed suppliers does stimulate
14 the production and availability of more organic
15 seed as those suppliers learn that there is a
16 market for it.

17 There was, lastly, you'll be happy to
18 know, there was discussion about how to help
19 certifiers really understand what improvement is
20 when seeking out organic seed. And so, I made a
21 note of that, that in the next guidance we'll try
22 to be giving --

1 And, some certifiers did give some
2 activities that could be used for actually
3 saying, yes, there has been improvement or there
4 has not.

5 Be assured that all the comments that
6 are current -- that have been given will be taken
7 into account and that's not just from this
8 proposal but I will keep going back to the
9 previous ones and feel free, of course, to submit
10 further comments.

11 MR. ELA: All right, comments?

12 Tom?

13 MR. CHAPMAN: Just a note that we'll
14 need to make a motion on that -- on those
15 amendments.

16 MR. ELA: Yes.

17 MS. BEHAR: Yes, we'll be -- so, we're
18 just going to come forward with the regulatory
19 change.

20 MR. ELA: Right, you'll need to make a
21 motion to do that.

22 MS. BEHAR: Oh okay. Okay.

1 MR. ELA: Do you want -- as point of
2 order, do you want that motion and then
3 discussion?

4 MR. CHAPMAN: I think we can discuss
5 it and then we can make the series of motions.

6 MR. ELA: Okay.

7 Emily?

8 MS. OAKLEY: I think one of the
9 greatest keys to success in vegetable crop
10 production is variety selection. I think that
11 most, if not all, vegetable producers are doing
12 extensive on farm trials.

13 There's a limit to the number that you
14 can do in a growing season and be successful and
15 keep track of them effectively to determine your
16 results.

17 But, I also want to say that while
18 we're all striving for continuous improvement, we
19 also rely on the varieties that we've chosen over
20 many years of production because they are
21 successful for us. And, I appreciate the work
22 that you've done on this.

1 MR. ELA: I'll make a comment. I
2 mean, on the horticultural side, too, it gets
3 complicated especially in perennials because
4 we're dealing with a root stock and a variety, so
5 it's not just a variety selection.

6 The characteristics of the root stock
7 often affect, I mean, a gala tastes like a gala
8 regardless, but the whole tree is very different,
9 depending on the bottom. So, it gets a little
10 more complicated in terms of access and choices.

11 I mean, essentially, there is very
12 little organic perennial material out there for
13 reasons we've already talked about.

14 But, it's not an easy nut to crack.
15 Conversely, you're planting a perennial so you're
16 talking about a non-organic thing that's out
17 there for a year and then in the next 20 or 30
18 years is organic. So, it's not quite the same as
19 rotating a crop every year, either.

20 I think it does -- I think it is a
21 different -- there are different issues there.

22 Other discussion?

1 (No audible response.)

2 MR. ELA: It seems like we should have
3 a motion to amend the document that was sent
4 forward.

5 MS. BEHAR: Yes, so I would like to
6 make a motion that the guidance be removed from
7 the document and from the proposal to be sent
8 back to Subcommittee.

9 MS. OAKLEY: I'll second.

10 MR. CHAPMAN: We have a motion and a
11 second.

12 The motion to remove the guidance
13 references and to look at that, it's magic, it
14 shows up on the screen.

15 And then, just for the sake of
16 clarity, we also have the full proposal, can you
17 project that, Michelle?

18 Well, yes, we'll be voting on a motion
19 to amend and then we'll be motioning, if that
20 motion passes, then we'll be putting on the
21 amended proposal.

22 All right, so, and if you could just

1 slowly scroll down?

2 You'll see we removed the sections
3 referring to -- keep scrolling -- we removed the
4 sections related -- keep scrolling -- related to
5 -- keep going, just keep, yes, yes -- related to
6 guidance and we left the sections that were
7 related to -- keep going -- that were related to
8 the -- is it all showing up -- it's coming, all
9 right -- there we go, all the cuts out related to
10 guidance -- so keep going down, keep going, go
11 until we reach the bottom.

12 And there we are, so the motion as
13 amended, we can go back to the --

14 MR. ELA: I'm glad we left the title
15 in there.

16 MS. BEHAR: Yes, so, I just want to
17 say that I had hoped to get this over the finish
18 line, but this is obviously an area that the
19 community is very passionate about and very
20 passionate about if it's a comma or a period or
21 an and or an or. And so, we want to get it
22 right.

1 MR. CHAPMAN: Yes, we'll probably take
2 a prerogative to fix the title in the back end.

3 But, the motion is what we're looking
4 at right now.

5 So, it's the motion -- the amendment
6 before us is to delete certain words to make the
7 motion read motion to accept all the additions as
8 described in the proposal section above to the
9 National Organic Program regulation.

10 The motion -- the amendment was made
11 by Harriet and seconded by --

12 MR. ELA: Emily.

13 MR. CHAPMAN: -- Emily.

14 MR. ELA: Emily.

15 MR. CHAPMAN: Emily, Dave, Emily,

16 Emily?

17 MR. ELA: No, the amendment was
18 seconded by -- wasn't it?

19 MR. CHAPMAN: Emily, yes. Seconded by
20 Emily.

21 A motion to amend is a simple, only
22 requires a simple majority and a yes vote is to

1 accept this amendment, a no vote is to reject the
2 amendment and the voting will start with Steve.

3 MR. ELA: Yes.

4 MR. BRADMAN: Yes.

5 DR. GREENWOOD: Yes.

6 MS. DE LIMA: Yes.

7 MR. SCHWARTZ: Yes.

8 MS. ROMERO-BRIONES: Yes.

9 MS. OAKLEY: Yes.

10 MS. BAIRD: Yes.

11 MR. BUIE: Yes.

12 MS. SWAFFAR: Yes.

13 MR. RICE: Yes.

14 MS. BEHAR: Yes.

15 DR. SEITZ: Yes.

16 MR. MORTENSEN: Yes.

17 MR. CHAPMAN: Chair votes yes.

18 MR. RICE: That's 15 yes, zero no,
19 zero absent.

20 MR. CHAPMAN: The motion passes and
21 the main motion is now amended.

22 Any further discussion on the main

1 motion?

2 (No audible response.)

3 MR. CHAPMAN: Otherwise, we'll proceed
4 to a vote. So, the motion? Yes. Do you want to
5 read it, want me to read it?

6 MS. BEHAR: I just wanted to read it
7 that the --

8 MR. CHAPMAN: The motion is to accept
9 all additions described in the proposal sections
10 above to the National Organic Program regulation.

11 (Off microphone comments.)

12 MR. CHAPMAN: Okay, so the amended
13 motion was originally -- the main motion was
14 presented by Harriet and seconded by Dave.

15 And the voting will start with Asa, a
16 yes vote is to adopt the amended motion.

17 MR. BRADMAN: Yes.

18 DR. GREENWOOD: Yes.

19 MS. DE LIMA: Yes.

20 MR. SCHWARTZ: Yes.

21 MS. ROMERO-BRIONES: Yes.

22 MS. OAKLEY: Yes.

1 MS. BAIRD: Yes.

2 MR. BUIE: Yes.

3 MS. SWAFFAR: Yes.

4 MR. RICE: Yes.

5 MS. BEHAR: Yes.

6 DR. SEITZ: Yes.

7 MR. MORTENSEN: Yes.

8 MR. ELA: Yes.

9 MR. CHAPMAN: Chair votes yes.

10 MR. RICE: That's 15 yes, zero no,
11 zero absent.

12 MR. CHAPMAN: Motion passes.

13 Steve?

14 MR. ELA: That concludes the proposal
15 section -- voting section.

16 So, we have three discussion documents
17 which are petitions that are before us but which
18 we haven't yet received TRs or haven't made a
19 formal proposal.

20 The first one is a discussion document
21 on ammonium citrate and ammonium glycinate. Dave
22 and Emily are co-working on this.

1 Dave, do you want to take it?

2 MR. MORTENSEN: Yes, so, these two
3 compounds manufactured by a company by the name
4 of Alpha Chelates, they submitted these two
5 compounds for us to consider in the Subcommittee
6 as agents that would help deliver micro nutrients
7 to the soil for plant uptake.

8 They -- these chelates, then, which is
9 the micro nutrient and the compound that this
10 company was applying for addition to the national
11 list at 205.601, this dates back to 2016.

12 The Board concluded that alternatives
13 existed back in the fall of 2016 and the
14 applicant pursued several, well four now, addenda
15 to have -- in which they pointed out that the
16 Board didn't understand our inorganic chemistry
17 basically.

18 And, was pleading for us to take a
19 more critical look at this on these two
20 compounds.

21 And, they were pointing to other
22 compounds, one of which we had said was the

1 alternative and were basically making an argument
2 that we were misapplying language about what is a
3 chelating agent and what is a chelated compound,
4 the combination of the micro nutrient and the
5 chelating agent.

6 We spent a good bit of time, actually,
7 a great deal of time, and Emily was spearheading
8 this and I agreed to help co-spearhead it.

9 And most recently, we requested a
10 technical report on this to help sort out the
11 chemistry.

12 A number of us also consulted some
13 chemists in our local work spaces and we are now
14 at a point where a proposal will be developed
15 that will be three-staged.

16 The first stage of the proposal will
17 be to clarify ambiguous language around chelating
18 agents and chelated materials.

19 And the technical report, we just
20 received will be very helpful in forming that
21 first stage.

22 The second stage is that future sunset

1 reviews and new additions to the list, we would
2 be applying this clarified language about
3 chelating agents and chelants.

4 And, in the third phase, we will
5 complete the review of these two compounds,
6 ammonium citrate and ammonium glycinate.

7 And, that is what I've got for now.

8 MR. ELA: Discussion among the Board?

9 A somewhat technical discussion
10 document, but one that we've received a fair
11 amount of information from the petitioner, so
12 we're hoping to move that forward.

13 All right, if there's no other
14 discussion on that, the next discussion document
15 is calcium acetate.

16 Calcium acetate is basically being
17 petitioned for use as a nutritional supplement.
18 While a number of other calcium products exist on
19 the market, calcium acetate acts more -- much
20 more quickly and may actually help with plant
21 nutritional disorders.

22 So, the other thing that it can be

1 used for is to prevent sun scald, so it can be
2 sprayed on top of plastic to reduce heat load or
3 in other uses to help reduce sunburn on plants.

4 Basically, we -- the public comments
5 from it kind of echoed those items, that it can
6 be used as a plant or soil amendment, that it can
7 protect crops against sun damage.

8 Basically, one comment was that if we
9 do add it, it should be annotated for use as a
10 foliar spray to treat a physiological disorder
11 associated with calcium uptake.

12 Another comment was though -- although
13 calcium acetate is a synthetic, it's production
14 from non-synthetic vinegar and natural calcium
15 carbonate aligns closely with other crop inputs
16 currently on the national list.

17 So, it's synthetic, but it's very
18 similar to some of the natural materials.

19 And then, another comment was
20 essentially that it made no sense to use a sun
21 scald protection if you're applying black plastic
22 which is a synthetic material and then you need

1 another synthetic material to reduce the effects
2 of the first synthetic material, that that's --
3 they didn't say it, but that's called a
4 treadmill.

5 So, just that pointing out that we
6 shouldn't be approving materials that -- we may
7 might want to look at the original material to
8 start with.

9 So, that's that in a nutshell. I
10 don't know if there's any discussion, but it will
11 probably be appearing next meeting as a proposal
12 as well.

13 Any discussion?

14 (No audible response.)

15 MR. ELA: Okay, and finally, this is
16 the easy on to end on, you know, not much public
17 comment, the paper pots.

18 And that, I'll turn over to Harriet.

19 MS. BEHAR: So, I did make extensive
20 notes of all the public comments, but I think
21 we've all heard quite a bit of public comments on
22 this about, you know, comparing it to newspaper

1 and recycled paper and virgin paper and adding to
2 the list, adding and expanding it to include
3 other paper-based production aids.

4 We did hear from a second manufacturer
5 which is one of the questions that we did ask on
6 the petition, although it's not a paper chain
7 pot, but the Ellepot is another type of paper
8 made in Denmark.

9 I was actually very impressed with the
10 number of personal letters that were sent in,
11 testimonials from farmers on the importance of
12 this material.

13 Also, the numerous certifiers who do
14 not allow its use but were in favor of allowing
15 the grace period for use until the National
16 Organic Standards Board has its chance to review
17 it.

18 So, we're going to go right to a
19 resolution and I will read it. The NOSB thanks
20 the NOP for enforcing the national list and for
21 its close review of this issue.

22 Paper pots are not explicitly listed

1 on the national list and, therefore, its usage as
2 a production aid can be confusing.

3 Different certifiers have viewed this
4 differently with decisions made in good faith and
5 with equally compelling perspectives.

6 In the opinion of the NOSB, paper pots
7 that may include virgin paper and adhesives are
8 used as a nursery production aid like many other
9 types of pots.

10 At the time of field planting, the
11 paper should be considered used and, therefore,
12 recycled since they have been used in the
13 nursery.

14 If this paper material is applied to
15 the field, it could then be considered a recycled
16 paper for use as a mulch.

17 Based on comments received at the fall
18 2018 NOSB meeting, we have heard universal
19 support for this material and this application.
20 Its moratorium on usage will create a substantial
21 financial burden on those growers who have used
22 this system in good faith with the consent of

1 their certifiers.

2 We understand that the national list
3 could be clearer in this regard and the National
4 Organic Standards Board is in the process of
5 considering a petition on paper pots.

6 Be it resolved, by unanimous vote, to
7 ensure a full and timely review of paper pots, we
8 request the National Organic Program allow the
9 continued use of paper pot usage while this
10 review and potential rulemaking proceed.

11 We believe the interpretation offered
12 in this resolution allows the program to take
13 this path while maintaining fidelity to the
14 existing regulations that the program is charged
15 with protecting.

16 MR. CHAPMAN: I have a motion for a
17 resolution. Is there a second?

18 MR. ELA: Dave.

19 MR. CHAPMAN: I'm waiting for somebody
20 here to say second.

21 MR. MORTENSEN: Second.

22 MR. CHAPMAN: Thank you, Dave.

1 We've got a motion and second, is
2 there any further discussion on this item?

3 MS. OAKLEY: I would just still
4 encourage those who would like to elevate this
5 issue to the Secretary and Undersecretary level
6 to go ahead as needed with letters.

7 Thank you.

8 MR. MORTENSEN: I would also just like
9 to thank all the folks that have reached out to
10 the Board and also to the Board itself for
11 collaborating on the resolution.

12 MR. ELA: And, I will echo what Emily
13 says, I think it's been very unclear to me of the
14 farmers out there along with others that it feels
15 like when we submit comments to the NOSB that we
16 have done our due diligence.

17 The reality is that the NOP does not
18 read those comments, we do. And so, I would echo
19 Emily saying the comments you made to the NOSB as
20 growers and especially about the financial burden
21 of this do send those letters to the Secretary
22 and Undersecretary.

1 It's a stamp or an email and I can't
2 reiterate how important those could be to helping
3 you with this process.

4 With that, I think we should vote on
5 the -- go ahead, Tom.

6 MR. CHAPMAN: Before we vote, I had my
7 hand up to say something else.

8 MR. ELA: Yes.

9 MR. CHAPMAN: I also appreciate that
10 this resolution acknowledges the NOP's role in
11 strict interpretation of enforcement and that's
12 something we like.

13 But, sometimes, there are confusion --
14 there is confusion in the standards. That's
15 happened more often than we would like it to,
16 particularly in the complex interpretation of
17 materials.

18 And so, I do think this flexibility is
19 prudent. So I hope this can potentially lead a
20 path forward on this item.

21 MR. ELA: Yes, and I think we do
22 applaud, we want strict enforcement of the list

1 and this is such a gray area, depending on how
2 you look at it.

3 To me, the universal acceptance of
4 people making comments, including those
5 certifiers that didn't necessarily approve it is
6 telling.

7 MR. CHAPMAN: Seeing no further
8 discussion, we'll proceed to a vote on the
9 resolution and the motion at hand.

10 The motion is before you, and a yes
11 vote would be to adopt this resolution, a no vote
12 would be to not adopt this resolution. The
13 voting will start with Rick.

14 DR. GREENWOOD: Yes.

15 MS. DE LIMA: Yes.

16 MR. SCHWARTZ: Yes.

17 MS. ROMERO-BRIONES: yes.

18 MS. OAKLEY: Yes.

19 MS. BAIRD: Yes.

20 MR. BUIE: Yes.

21 MS. SWAFFAR: Yes.

22 MR. RICE: Yes.

1 MS. BEHAR: Yes.

2 DR. SEITZ: Yes.

3 MR. MORTENSEN: Yes.

4 MR. ELA: Yes.

5 MR. BRADMAN: Yes.

6 MR. CHAPMAN: Chair votes yes.

7 MR. RICE: That's 15 yes, zero no,
8 zero absent.

9 MR. CHAPMAN: The motion passes.

10 MR. ELA: Tom, I'd like to add in just
11 on the final comments on this that we did listen
12 carefully to one of these issues as we cannot
13 approve a product, we are approving materials.
14 And, I think the comments of paper in general as
15 a planting aid, whether it's the seed strips or
16 whatever, that we take those -- that actually
17 that as we look at it, we may look at that
18 broader use of paper as a planting aid.

19 And, that may actually help us kind of
20 proceed on this topic so that we're thinking
21 broader based.

22 My one concern is I really wrestle

1 with the adhesives, especially added after the
2 paper is made. And so, I would really appreciate
3 any feedback as stakeholders on the open docket
4 or to the Committee somehow of how we can make
5 sure that we allow a very appropriate use of this
6 technology and whatever form.

7 And also, don't make it so broad that
8 we end up with unintended consequences of
9 allowing materials we -- none of us really want
10 on our soils.

11 MR. CHAPMAN: And, to echo on that,
12 just I also hope that if the NOP does take action
13 like we're asking on this, it would actually
14 potentially free up the Subcommittee to put the
15 sufficient time and thought into this instead of
16 trying to rush through to protect the one
17 application that we may appreciate without
18 thinking of all the potential applications of
19 this material.

20 MR. ELA: If there is no other
21 discussion, then that finishes the Crops
22 Subcommittee section of the program.

1 Thank you to the Crops Subcommittee,
2 it was a long docket this time. You guys did a
3 great job.

4 And, it's before 5:00.

5 MR. CHAPMAN: All right, thank you,
6 Steve. That concludes the Subcommittee portions
7 of the agenda.

8 And, looking at the agenda, it's the
9 next section is deferred proposals and final
10 votes. We have no deferred proposals or final
11 votes, so we'll proceed to the work agenda item
12 and I am going to sit over by Michelle's desk to
13 run through the work agendas.

14 We will be publishing this later, so
15 okay, so first up on the upcoming work agenda
16 will be 2021 sunsets. This is the last year of
17 the sunset reorganizations.

18 The sunset reorganizations are quite
19 long, so it is here, it's also published in the
20 proposal on the reorganization of sunset
21 materials.

22 Okay, we're now going to run through

1 non-sunset items by Subcommittee.

2 So, first up is CACS and we continue
3 to have the import oversight item on our work
4 agenda. Definitely the update from the spring
5 2018 public comments will be planning to come
6 forward.

7 Scott, do you have any other ideas off
8 the top of your head putting on the top of what
9 the Subcommittee might take this agenda item
10 further?

11 MR. RICE: We're still I think on the
12 heels of what we've just worked on in this
13 meeting. Might take a look at what just in
14 general what other aspects we can dive into
15 whether it's building on further risk factors or
16 there was some mention of developing something
17 similar as risk factors for certifiers and
18 certified operations. So, that's an idea as well.

19 MR. CHAPMAN: And, after the last
20 meeting, we regrouped with the program and
21 identified the best areas for us to work on for -
22 - on this subject area in the last semester and I

1 think we'll do probably the same here as well to
2 get there.

3 Thinking on where NOSB work would be
4 most helpful.

5 Up next is Crops and so, all the
6 materials discussion documents, we are expecting
7 that those will come forward as petitions for
8 votes including the AITC that was pushed back.

9 We also have a work agenda item to
10 review the annotation -- to review a
11 recommendation for an annotation on liquid fish
12 products.

13 The biodegradable based mulch is still
14 on there as a TBD and then we sent the guidance
15 portion of the genetic integrity of seed grown on
16 organic land back as well.

17 Up next is Handling. So, Handling has
18 the silver dihydrogen citrate petition that was
19 sent back to it as well as the two petition
20 discussions that we discussed, pullulan and
21 collagen.

22 Livestock Subcommittee has one

1 petition for oxalic acid. That was also a
2 petition discussion here.

3 MS. SWAFFAR: Tom, can I say something?

4 MR. CHAPMAN: Yes.

5 MS. SWAFFAR: so, also we do have a
6 work agenda request in for vaccines made from
7 excluded methods. So, hopefully, we might be
8 adding that to our work agenda.

9 But, we have some pretty hefty sunset
10 items including my favorite material, methionine.

11 MR. CHAPMAN: Okay. And then, on
12 Materials Subcommittee, we have the marine
13 materials item that may or may not come forward
14 for a vote at the next meeting.

15 We have the excluded methods ongoing
16 work. We have research priorities that we
17 discussed bring forward as a discussion document
18 to get feedback at an earlier stage, the genetic
19 integrity transparency that was sent back as well
20 as the sanitizers work agenda item.

21 The sanitizers item is still in its
22 initial stages, so I -- we don't expect to have

1 something at the spring meeting in terms of a
2 discussion document or a vote, is that correct?

3 MS. BEHAR: Yes, I think by then we
4 will have decided what we want in the TR and will
5 have probably initiated it, but probably won't be
6 back by spring.

7 MR. CHAPMAN: Then we have been
8 collecting some minor changes that we've made
9 related to the policies and procedures manual,
10 best practice of petition discussion documents
11 being one.

12 We've also assigned some petition
13 responsibilities to the role of the Secretary,
14 namely to monitor the open docket and notify the
15 rest of the Board if something comes forward.

16 So, I think we have enough parking lot
17 items that we'll probably reconvene the Policy
18 Subcommittee to bring forward those changes in
19 the policies and procedures manuals as well as
20 fix up some conflicting sections that are in
21 there currently.

22 And, that is the totality of the --

1 what we expect to bring forward at the spring
2 meeting.

3 Any questions from the Board?

4 (No audible response.)

5 MR. CHAPMAN: Then, I believe this
6 document gets published after the executive
7 calls, is that correct? Yes, so, look for that
8 for updates as this changes.

9 Clearly, this is our best thinking on
10 what will happen. But as we proceed through the
11 year, you know, time will tell what we can
12 actually bring forward or what information we
13 have for the spring meeting.

14 Okay, so up next, we have officer
15 elections. And, I'm going to ask Michelle to put
16 up some slides of the officer elections sections
17 of our policies and procedures manual.

18 So, I'm just going to read through
19 this briefly.

20 So, in the election of officers, we
21 first start with nominations. Any NOSB member is
22 eligible for consideration for any officer

1 position.

2 And, members may self-nominate or be
3 nominated by another member of the NOSB. Members
4 are also able to serve more than one term in any
5 officer position, but I think it's missing here
6 that you can't serve for three years or more.

7 Officers will be elected to a one year
8 term by a majority vote.

9 Newly elected officers assume their
10 positions at the conclusion of the fall meeting
11 and assume all the responsibilities thereof at
12 that time.

13 I was unaware of this, but I guess
14 outgoing NOSB officers will assist incoming
15 officers with the transition through their new
16 roles to be completed no later than January 23rd
17 of the following year. Man, did I think I was
18 out.

19 Votes will be by secret ballot. We
20 start with the Chair then proceed to the Vice
21 Chair and the Secretary.

22 The secret ballot that we use are

1 these handy dandy cards.

2 Ballots will be counted for one office
3 at the time and it's generally done with the
4 Secretary and the Vice Chair, although, if those
5 members are nominated for the office, then we
6 will select from other members of the Executive
7 Subcommittee just to prevent conflicts of
8 interest.

9 We do require a majority vote, so the
10 first nominee that receives the majority of the
11 votes will be elected. But, if there's a
12 plurality then the candidate receiving the least
13 number of votes will be removed from running and
14 we will re-vote for that position until a nominee
15 receives the majority.

16 In the event of a tie, there will be a
17 re-vote and re-vote and a re-vote and a re-vote
18 until someone finally gets a majority.

19 The votes will remain confidential and
20 the ballots will be disposed of and a nominee,
21 unfortunately, may withdraw their name at any
22 time, but not once you're in office.

1 And, in the event of only one nominee,
2 then we won't need to use the cards, we will just
3 vote by acclamation.

4 Are there any questions from Board
5 members about the procedures?

6 Okay, at this time, then I am going to
7 pass down the blue cards. Please take one and
8 pass it along. And, these will be for Chair.

9 So, at this time, we will open it up
10 for nominations for Chair.

11 Emily?

12 MS. OAKLEY: I nominate Harriet for
13 Chair.

14 MR. CHAPMAN: All right, we have one
15 nominee for Chair.

16 Need to speak into the mic, Eric.

17 MR. SCHWARTZ: Sorry, I nominate Scott
18 for Chair.

19 MR. CHAPMAN: All right, we have two
20 nominees for Chair.

21 Do the nominees want to keep their
22 names in?

1 MR. RICE: Just a clarification,
2 anyone can withdraw at any time?

3 MS. BEHAR: I guess I want to clarify
4 that I did not offer the pies as bribery.

5 MR. BRADMAN: Do the nominees want to
6 say anything?

7 MR. CHAPMAN: We don't normally have
8 the nominees speak, but if they want to, we can.
9 Otherwise, we'll just proceed to a vote since the
10 Chair -- since the Vice Chair and the Secretary
11 are both running, I'm going to ask Steve, the
12 Crops Chair, if you don't mind, counting the
13 votes with me and collecting the votes.

14 (Off microphone comments.)

15 MR. CHAPMAN: Okay, so, write down the
16 votes and then we'll pick them up. Steve, maybe
17 you can get that side, I'll get this side.

18 (Voting by secret ballot.)

19 MR. CHAPMAN: All right, we have a new
20 Chair, Harriet.

21 (Applause.)

22 MR. CHAPMAN: Okay, next up is Vice

1 Chair, nominees for Vice Chair?

2 Harriet?

3 MS. BEHAR: Steve.

4 (Off microphone comments.)

5 MS. SWAFFAR: I'd like to nominate

6 Scott.

7 MR. CHAPMAN: We got a nomination for

8 Scott.

9 Oh, I need to pass out the cards.

10 MR. CHAPMAN: Okay, anyone else?

11 Sorry, I had to pass the cards.

12 (No audible response.)

13 MR. CHAPMAN: No? All right, so, on

14 this one, I'm going to ask Harriet to count the

15 votes with me.

16 So, it's Scott and Steve.

17 (Voting by secret ballot.)

18 MR. CHAPMAN: And we have a new Vice

19 Chair, Steve.

20 (Applause.)

21 MR. CHAPMAN: And, up last, the

22 position of Secretary.

1 Oh, come on.

2 Yes?

3 MS. SWAFFAR: I would like to nominate
4 Scott.

5 (Laughter.)

6 MR. CHAPMAN: We've got Scott, anyone
7 else?

8 All right, seeing no one, I think we
9 can do this one by the good old fashioned
10 acclamation.

11 Here, here. So, let's give a round of
12 applause for our new officers, Harriet as Chair,
13 Steve as Vice Chair and Scott as Secretary.

14 (Applause.)

15 MR. CHAPMAN: We will now move on to
16 other business.

17 (No audible response.)

18 MR. CHAPMAN: Seeing none, then I
19 think we can move to adjournment, 5:16 enough for
20 you?

21 MS. BEHAR: I would like to say
22 something.

1 MR. CHAPMAN: All right, I guess we've
2 got some things to be said. I guess I'll start
3 with Harriet and then --

4 MS. BEHAR: Well, I would like to very
5 much thank Tom for his two years of leadership.
6 It's going to be difficult, I'm going to study
7 the transcripts on how you've run the meeting to
8 try to run them as smoothly and evenly and really
9 encourage interaction and a lot of good debates.

10 So, I really appreciate your time as
11 Chair, thank you very much, Tom.

12 MR. CHAPMAN: Thank you, Harriet.

13 (Applause.)

14 MR. CHAPMAN: And I look forward to
15 sitting down in the cheap seats at the end.

16 So, Emily or A-dae, you're going to
17 have a new person chatting your ear off.

18 Jenny?

19 DR. TUCKER: So, a couple of closing
20 comments. I want to first welcome our new
21 officers to their new roles. So, congratulations
22 to all of you, we look forward to working with

1 you, so thank you very, very much in advance for
2 your service and for all your service to date.

3 So, let's give them another round.

4 (Applause.)

5 DR. TUCKER: I'd like to thank the
6 entire Board. Obviously, this is a very intense
7 time of your lives in addition to these three
8 days, the dedication and devotion and time that
9 you put into this work is just tremendous.

10 So, let's give a round to the Board.

11 (Applause.)

12 DR. TUCKER: Let us thank the audience
13 for being here, sticking it through. Woo hoo.

14 (Applause.)

15 DR. TUCKER: And, of course, I want to
16 thank the NOP staff who are -- who remain
17 completely focused through this event. So, of
18 course, Michelle, who runs the place, thank you,
19 Michelle.

20 (Applause.)

21 DR. TUCKER: Clarissa, you did a nice
22 job at my side hand, thank you very much.

1 (Applause.)

2 DR. TUCKER: Devon, you're fabulous.

3 And then, of course, let me
4 acknowledge Paul, even though he had to leave a
5 little bit early. He's a tremendous help in
6 supporting all the Board's work.

7 And then, finally, I want to say a
8 thank you, a special thank you to Tom. So, in
9 the National Organic Program, we have awards
10 called "kudos" and we give them when people have
11 gone above and beyond in service to our
12 stakeholders and to others in the program.

13 And, Tom gets two "kudos" for his two
14 years on the Board, so he gets a travel mug with
15 the organic seal on the sleeve and he gets a
16 thermos with the organic seal.

17 And so, you don't have to take the box
18 on the plane if you don't want to, but this is
19 for you to thank you for everything that you have
20 done.

21 I've enjoyed working with you.

22 (Applause.)

1 MR. CHAPMAN: Thank you.

2 DR. TUCKER: Tom has played just a
3 vital role during a transition period. He opened
4 the meeting by talking about how we went from
5 having really not a complete USDA leadership line
6 to here we are with all the positions filled
7 except for mine, the Associate, which will be
8 next.

9 And so, Tom, you've provided a voice
10 of stability, of support, of friendship and it's
11 just a true honor to know you. So, thank you.

12 (Applause.)

13 MR. CHAPMAN: Thank you, Jenny, and
14 thank you for this nice thermos, it will do great
15 at keeping my beer cold.

16 (Laughter.)

17 MR. CHAPMAN: With that, if Harriet
18 could do the honors with hitting the gavel, I
19 think we will consider this meeting adjourned.

20 MS. BEHAR: Meeting adjourned.

21 (Whereupon, the above-entitled matter
22 went off the record at 5:20 p.m.)

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C E R T I F I C A T E

This is to certify that the foregoing transcript

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Fall 2018 Meeting

Before: USDA

Date: 10-26-18

Place: St. Paul, MN

was duly recorded and accurately transcribed under
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