

UNITED STATES DEPARTMENT OF AGRICULTURE  
AGRICULTURE MARKETING SERVICE (AMS)  
NATIONAL ORGANIC PROGRAM (NOP)

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MEETING OF THE NATIONAL ORGANIC  
STANDARDS BOARD (NOSB)

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MONDAY

OCTOBER 25, 2010

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The National Organic Standards  
Board convened at 8:00 a.m. at the Best  
Western InnTowner, 2424 University Avenue,  
Madison, Wisconsin, Daniel G. Giacomini,  
Chairman, presiding.

MEMBERS PRESENT

DANIEL G. GIACOMINI, Chairman

STEVE DEMURI

JOE DICKSON

KRISTINE "TINA" ELLOR

KEVIN K. ENGELBERT

JAY FELDMAN

BARRY R. FLAMM

JOHN FOSTER

WENDY FULWIDER

JENNIFER M. HALL

KATRINA HEINZE

TRACY MIEDEMA

JEFFREY W. MOYER

JOSEPH SMILLIE

STAFF PRESENT

MILES McEVOY, Deputy Administrator, National  
Organic Program

MELISSA BAILEY, Director, Standards Division,  
National Organic Program

LISA BRINES, Standards Division, National  
Organic Program

MARK LIPSON, Organic and Sustainable  
Agriculture Policy Advisor, Office of  
the Secretary

ARTHUR NEAL, Director of Program  
Administration, National Organic Program

EMILY BROWN ROSEN, Agricultural Marketing  
Specialist

VALERIE FRANCIS, Standards Division

LISA AHRAMJIAN, NOSB Executive Director

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

8:14 a.m.

MR. GIACOMINI: Good morning,  
everyone. I officially call this meeting of  
the National Organic Standards Board to order.

The Board Members who are able to  
be here are seated and we have a quorum.

I'd like to move directly on to  
the business of the Board. The first business  
this morning is the approval of the agenda.  
The agenda has been posted for the public and  
has been presented to the Board and the  
program. After we have a motion to accept  
the agenda, we can deal with any necessary  
motions to amend.

Do I have a motion to accept -- to  
approve the agenda of the meeting?

MR. MOYER: I'll make a motion.  
I'll make a motion that we accept the agenda.

MS. MIEDEMA: Second.

MR. GIACOMINI: Okay. It's been  
moved and seconded to accept the agenda for

1 this meeting. Mr. Maker of the Motion, do you  
2 have a discussion and then do we have any  
3 other amendments?

4 MR. MOYER: Yes, Mr. Chairman,  
5 I've got one suggested change to the agenda  
6 and that is on Thursday, October 28th at 4:45.  
7 We have listed in the agenda the selection of  
8 NOSB officers and committee chairs.

9 My understanding is that we do not  
10 select committee chairs at this meeting, but  
11 that is up to the officers once they're in  
12 place. So, I suggest that -- I make a motion  
13 that we strike the words committee chairs from  
14 that line.

15 MR. GIACOMINI: And since you made  
16 the motion, we will assume that's a friendly  
17 amendment and we'll proceed with this as an  
18 amended motion to amend the agenda.

19 Any further discussion? Seeing  
20 none, proceed to vote. Those in favor of  
21 approving the agenda as amended say aye.

22 Tina says wait. I wait. Let's

1 get all the changes at once. I apologize.

2 We need -- everybody needs to turn  
3 off their mikes when they're done. Even I'm  
4 going to have to be wacko at the --

5 MS. ELLOR: Are we going to do all  
6 the amendments at one time?

7 MR. GIACOMINI: Yes.

8 MS. ELLOR: Okay. There are two  
9 materials on the Crops Committee agenda both  
10 on Tuesday and Thursday that we need to have  
11 come off and that's chlorine materials and  
12 copper materials. Those were on the agenda in  
13 hopes we would get technical material in time  
14 and we did not.

15 So, I'd like to or maybe Jeff  
16 could make the motion. That would make it so  
17 much less complicated.

18 MR. GIACOMINI: So, that's  
19 chlorine and what?

20 MS. ELLOR: Copper materials.

21 MR. MOYER: I'd like to amend the  
22 agenda to strike chlorine and copper materials

1 from the Crops Committee agenda for Tuesday,  
2 October 26th and Thursday under the voting.

3 MS. ELLOR: I'll second that.

4 MR. GIACOMINI: All right. I  
5 assume again that that's a friendly amendment.  
6 So, we will proceed with the amended motion  
7 that includes the dropping of those two items  
8 from both days.

9 Okay. Try it again. Any further  
10 amendments to the agenda?

11 Seeing none proceed to vote.  
12 Those in favor of accepting the agenda as  
13 amended say aye.

14 (Chorus of ayes.)

15 MR. GIACOMINI: Those opposed?

16 The motion passes.

17 Okay. I'd like to welcome  
18 everyone here to the meeting this morning.  
19 It's nice being this time here in the State of  
20 Wisconsin.

21 I'm happy to make -- I've decided  
22 to make a special announcement as the Chair in

1 honor of this being home of America's  
2 Dairyland and home of the Cheese Heads that  
3 anyone wearing a Cheese Head to the meeting  
4 will receive free admittance. So, you won't  
5 have to pay your admission fee if you wear a  
6 Cheese Head during the meeting. So,  
7 hopefully, that will bring out the Wisconsin  
8 faithful.

9 As far as Internet service, I  
10 believe you need to sign up on the CBHI  
11 connection. That may be all -- everybody  
12 already done on that, but I just want to make  
13 that official for anybody that's struggling to  
14 get on.

15 Also, I remind everyone to please  
16 turn off your sound for your cell phones and  
17 any other devices. Ringers going off during  
18 the meeting, the owner of that device will be  
19 responsible for one round of drinks after the  
20 meeting that day of the meeting for all the  
21 Board Members.

22 So, also please refrain from



1 calling or texting -- yes, actually, if you  
2 call a Board Member and their phone is off,  
3 then they can get it good, but please refrain  
4 from calling and texting and otherwise  
5 electronically communicating with Board  
6 Members during the meeting while we're in  
7 session.

8 It's been my pleasure to have the  
9 Board Members introduce themselves now. The  
10 amount of work that each and every Board  
11 Member does on this committee has grown so  
12 substantially just in the time that I've been  
13 on.

14 At my first meeting, the first-  
15 half day was -- this is a FACA Board, Federal  
16 Advisory Committee. First-half day was FACA  
17 training. The afternoon was a pasture  
18 symposium. The second day was a pasture  
19 symposium and following that including all the  
20 public comment for the pasture symposium was  
21 only a day and a half meeting. We are now up  
22 to a four and a half -- a four-day meeting and

1 we are hoping that we don't go tremendously  
2 overtime at that and that is representative in  
3 the amount of work that this committee does.

4 Many of the committees that we're  
5 on have weekly calls. Everyone is putting in  
6 hundreds and hundreds of extra -- additional  
7 hours both in those calls and in their own  
8 time and working on the committee work, doing  
9 committee work and I'm extremely privileged  
10 and honored to have worked with such a great  
11 group of people.

12 Everyone on the Board is on at  
13 least somewhere between two and five  
14 committees including the Administration Team  
15 and Executive and all the work that everyone  
16 does is very much appreciated.

17 So, if we could please start with  
18 each of the members introducing themselves.  
19 We'll start on this side of the room and we'll  
20 just work around the table.

21 MR. FOSTER: My name is John  
22 Foster. I'm a handler representative. I work

1 for Earth Bound Farm. I manage organic  
2 compliance and deal with food safety and  
3 quality issues.

4 How much more detail would you  
5 like?

6 MR. GIACOMINI: That is the  
7 briefest you will be all meeting. So, that  
8 was just fine.

9 MR. DeMURI: Good morning. My  
10 name is Steve DeMuri. I live in Carmichael,  
11 California which is near Sacramento. I'm a  
12 handler representative. I work for the mm mm  
13 good Campbell Soup Company.

14 In my spare time, I'm Chairman of  
15 the Handling Committee and also on the Policy  
16 Development Committee and the Executive  
17 Committee.

18 MR. FLAMM: Hi, I'm Barry Flamm  
19 from Montana. I'm in one of the environmental  
20 slots. This is my third year and sixth  
21 meeting and it's great to be here in Madison  
22 and the Chair gave some current history about

1 the great State of Wisconsin and Madison, but  
2 I would like to bring up a little history.

3 There's nothing like Madison and  
4 this area for the history of conservation in  
5 this country. So, if you haven't recently  
6 read Sand County Almanac, I brought it along  
7 to re-read. So, if you want to borrow my  
8 copy, you may.

9 Getting back to NOSB direct  
10 business, I chair the Policy Committee and I  
11 serve on the Crops Committee and the  
12 Certification Compliance Committee.

13 MR. DICKSON: Good morning. My  
14 name is Joe Dickson. I'm from Austin, Texas.  
15 I manage organic programs and certification  
16 systems for Whole Foods Market. I am the  
17 retail representative on the Board and I serve  
18 on the Compliance, Livestock and Handling  
19 Committees.

20 MR. SMILLIE: My name's Joe  
21 Smillie. I'm the certifier rep on the Board.  
22 I'm from Burlington, Vermont. I work for

1 Quality Assurance International in my spare  
2 time and I'm the Chair of the Certification  
3 and Accreditation Compliance Committee and on  
4 the Handling Committee as well as the  
5 Executive Committee.

6 And since we're talking about  
7 Madison, being one of the radical students of  
8 the '60s, Madison was one of the centers of  
9 great radical activity in the late '60s for  
10 those of you who remember. If you don't  
11 remember, then you weren't there.

12 MS. MIEDEMA: Good morning,  
13 everyone. My name is Tracy Miedema. I am  
14 from Philomath, Oregon and I am beginning my  
15 last year here on the Board. I work for Earth  
16 Bound Farm. Started there about five months  
17 ago and for the last 12 years, have been in  
18 the organic produce industry working for both  
19 big and large companies.

20 Thanks for making the trip out  
21 here to Madison. I think these Board meetings  
22 really give us a great opportunity to all be

1 pulling in the same direction to democratize  
2 organic at the farm and all the way to  
3 consumers.

4 MS. ELLOR: My name is Tina Ellor  
5 and I am one of the environmentalists serving  
6 on the Board. I also serve as secretary of  
7 the Board and am in charge of the timers.  
8 Just a little suggestion as to who you should  
9 be nice to.

10 I work for Phillips Mushroom Farms  
11 as a mycologist and yes, I'm starting my last  
12 year on the Board I think or ending my fourth.  
13 Not sure which way to look at that. Half  
14 full/half empty and I chair the Crops  
15 Committee and serve on the Livestock  
16 Committee, the Executive Committee and also  
17 the Admin Team.

18 MR. MOYER: I'm Jeff Moyer. I'm  
19 one of the producer reps on the Board. I'm  
20 the Farm Director for the Rodale Institute in  
21 Pennsylvania.

22 In terms of the Board, I'm a past

1 Board Chairman. Currently, I'm the Vice Chair  
2 of the Crops Committee, sit on the Livestock  
3 and the Materials Committee and I have my own  
4 small farm at home.

5 MS. HALL: HALL: Good morning.  
6 I'm Jennifer Hall. I'm a consumer rep on the  
7 Board and live in Spokane, Washington.

8 I over the past several years have  
9 helped to design and open a consumer food coop  
10 there which is the first and only one there.  
11 So, we're proud of that and continue with the  
12 community building in town doing consumer  
13 education and it has have been tough, but a  
14 great thing to do in tandem with being on this  
15 Board to have that knowledge and being able to  
16 convey that directly to the consumers we work  
17 with.

18 So, I serve on both the Livestock  
19 Committee and the Certification and Compliance  
20 Committee.

21 MR. ENGELBERT: Good morning. I'm  
22 Kevin Engelbert. I'm an organic dairy farmer

1 from Nichols, New York. We have about 120  
2 cows and 60 beef animals. We finish off a few  
3 hogs each year and we also have a grain  
4 business along with our retail meat and cheese  
5 businesses.

6 I'm a proud member of the class of  
7 2011. This is my last meeting and as is my  
8 normal procedure, I want to publicly thank my  
9 sons for taking over the workload and allowing  
10 me to serve on this Board. There's no one  
11 more happy than they are that this is my last  
12 meeting.

13 I serve on the Policy and  
14 Development Committees, the Crops Committee  
15 and I'm Chair of the Livestock Committee and  
16 it's been an honor and a pleasure to be on  
17 this Board the last five years.

18 MS. FULWIDER: I'm Wendy Fulwider  
19 and I'm a producer rep. I work for Organic  
20 Valley as a livestock care specialist and I  
21 have a pastured livestock farm by Ripon,  
22 Wisconsin.



1 MS. HEINZE: Good morning. I'm  
2 Katrina Heinze. I hold the scientist slot on  
3 the Board and am Chair of the Materials  
4 Committee. Also serve on the Handling  
5 Committee and the Executive Committee and I'm  
6 completing my fourth year.

7 I am the Manager of Quality and  
8 Regulatory Operations for Small Planet Foods.  
9 It's our organic division at General Mills.  
10 There I have responsibility for food safety,  
11 regulatory compliance and product quality for  
12 our Cascadian Farm, Muir Glen and LaraBar  
13 Brands and most importantly for me, I am the  
14 mother of two budding organic consumers, a  
15 ten-year-old girl and a six-year-old boy.

16 MR. FELDMAN: Thank you, Katrina.

17 Good morning. I'm Jay Feldman,  
18 Executive Director of Beyond Pesticides based  
19 in Washington, D.C. We're a national  
20 grassroots public health and environmental  
21 organization.

22 I serve on the Policy and

1 Development Committee, the Crops Committee,  
2 Vice Chair of the Materials Committee.

3 Thanks.

4 MR. GIACOMINI: And last, but not  
5 least. My name is Dan Giacomini. I was going  
6 to say last standing, but no, my name is  
7 Daniel Giacomini. I'm Chairman of the Board  
8 this year and I have a consumer seat on the  
9 Board.

10 In the past, I also was three and  
11 a half years as Material Chairman. I serve on  
12 the Livestock and Materials Committee as well  
13 as the Executive and Administration Team.

14 I've been part of the organic  
15 industry for nearly 20 years and I live in the  
16 Bay Area of California and it's been my  
17 pleasure to serve on this Board and with all  
18 the great people that I've had the opportunity  
19 to do that with.

20 We have one further announcement  
21 relative to Board and if Miles would please  
22 make that.

1 MR. MCEVOY: Good morning. Miles  
2 McEvoy, Deputy Administrator, National Organic  
3 Program. Great to have you all here this  
4 morning. Thanks for your service.

5 And one of the Board Members,  
6 Annette Riherd has resigned from the Board  
7 last week or within the last couple of weeks.  
8 So, that's a new announcement. She just found  
9 that changes in her work situation made it  
10 that she was not available to participate in  
11 the Board.

12 So, we want to thank her for her  
13 service last year, but that position is now  
14 unfilled and we'll see about how we're going  
15 to fill that position.

16 MR. GIACOMINI: Thank you. Miles,  
17 if you can keep your mike on there and please  
18 introduce us to the intrepid crew of NOP staff  
19 people that you've brought with you.

20 MR. MCEVOY: All right. On my  
21 left here and on your right is Mark Lipson.  
22 He's the Organic Policy Director for the U.S.

1 Department of Agriculture. So, Mark's been  
2 with the Department for what? Three months  
3 now? Four months now.

4 It's really fantastic to have him  
5 with USDA. He does an amazing amount of  
6 things that free up our time to focus on the  
7 National Organic Program and regulatory and  
8 enforcement issues. So, Mark will describe a  
9 lot of those activities during his  
10 presentation later this morning, but we're  
11 very, very happy to have him in the leadership  
12 of USDA to help out with organic issues.

13 Next I have Arthur Neal the  
14 Associate Deputy Administrator of the National  
15 Organic Program. Arthur has been with the  
16 program -- well, he has actually the most  
17 institutional memory here at the table at this  
18 time because he was with the program from 2000  
19 to 2007 and took a little hiatus from the  
20 program and we grabbed him back in the spring  
21 and it's really, really great to have him  
22 there and his leadership.

1                   Next I have Emily Brown Rosen  
2                   who's with the Standards Division. A lot of  
3                   you know her well. She's been a frequent  
4                   participant in National Organic Standards  
5                   Board meeting. She worked with AMRI for a  
6                   number of years, with Pennsylvania Certified  
7                   Organic more recently. One of the foremost  
8                   experts on materials issues. So, somebody I  
9                   rely on a lot for expertise.

10                   Next on my right is Melissa Bailey  
11                   who's the Standards Director. She's been with  
12                   the program for I think three months now,  
13                   maybe four. So, she's the person that takes  
14                   care of all the rule development, the program  
15                   handbook, the draft guidance. That's all  
16                   under her shop. She's a new Ph.D. from Tufts  
17                   University and very, very happy to have her  
18                   there to run that division.

19                   Next I have Lisa Brines, Dr. Lisa  
20                   Brines, from Washington State. Previously  
21                   worked with the Washington State Department of  
22                   Agriculture and Materials Review, the

1 Materials Review Program under the WSDA  
2 program. She handles the National List and  
3 petition process.

4 And then next I have Valerie  
5 Frances who you know quite well. The former  
6 Executive Director for the National Organic  
7 Standards Board and now in the Standards  
8 Division writing rules and guidance.

9 And then finally, Lisa Ahramjian  
10 who's the new NOSB Executive Director over at  
11 the table on the right. She comes from the  
12 National Institutes of Health. Has worked  
13 with panels at the National Institutes of  
14 Health. So, she's somewhat familiar with this  
15 kind of format, though everything about  
16 organic is somewhat unique.

17 So, that's our crew here. Thanks.

18 MR. GIACOMINI: Thank you, Miles.

19 One further announcement,  
20 introduction of someone in attendance Joe  
21 Smillie.

22 MR. SMILLIE: Yes, I'd like

1 Michael Hankin to stand up. Where is Michael?  
2 There he is. Michael Hankin was one of the  
3 early leaders of the National Organic Program  
4 and was very, very much involved in -- I can't  
5 remember his exact title. I think he held  
6 more than one over the few years, but Michael  
7 was really much involved in the writing of the  
8 regulation that we're all working on and did  
9 a fabulous job and was one of the real early  
10 leaders of the National Organic Program.

11 MR. GIACOMINI: Welcome, Michael.  
12 You can have a chance hopefully to take a look  
13 at us and see what we've become and see  
14 whether it was anything that you imagined.

15 A tradition has developed at the  
16 start of these meetings for the chairperson to  
17 read the vision and mission statement of this  
18 Board and I'd like to do that now.

19 The NOSB vision statement. The  
20 NOSB's vision is an agricultural community  
21 rooted in organic principles and values that  
22 instills trust among consumers, producers,

1 processors, retailers and other stakeholders.  
2 Consistent and sustainable organic standards  
3 guard and advance the integrity of organic  
4 products and practices.

5 Our statutory mission is to assist  
6 in the development of standards for the  
7 substances to be used in organic production  
8 and to advise the Secretary on other aspects  
9 of implementation of this title.

10 The NOSB mission statement is to  
11 provide effective and constructive advice,  
12 clarification, and guidance to the Secretary  
13 of Agriculture concerning the National Organic  
14 Program and the consensus of the organic  
15 community in carrying out the mission.

16 Key activities of the Board  
17 include assist in the development and  
18 maintenance of organic standards and  
19 regulations, review petition materials for  
20 inclusion on or deletion from the National  
21 List of approved and prohibited substances,  
22 recommend changes to the National List,



1       communicate with the organic community  
2       including conducting public meetings,  
3       soliciting and taking public comments, provide  
4       timely information and education on the NOP,  
5       making responsible use of a variety of  
6       communication channels and to communicate,  
7       support and coordinate with the NOP staff.

8               This is the mission and vision of  
9       this Board and the Members of this Board bring  
10       a tremendously diverse history and experience  
11       to this task, but we each strive to fulfill  
12       that mission and vision in our own best way.

13               Moving on with the agenda, now, I  
14       turn to the Secretary for the Secretary's  
15       Report.

16               Madam Secretary, your report  
17       please.

18               MS. ELLOR: We just have two items  
19       of bookkeeping that we need to take care of.

20               We need to vote to accept or  
21       reject the April 2010 meeting transcripts  
22       which I'm sure you have all read back to back.

1 Right? Front to back. And the voting results  
2 as the official record.

3 So, that's all we need to do.

4 MR. GIACOMINI: Do you have a  
5 motion to accept one or either of those, Madam  
6 Secretary?

7 MS. ELLOR: I will make that  
8 motion. To accept -- we can do this as a  
9 block, I think. To accept the April 2010  
10 meeting transcripts and voting results as  
11 official record of the April 2010 meeting.

12 So, there's the motion.

13 MR. MOYER: I'll second the  
14 motion.

15 MR. GIACOMINI: It's been moved  
16 and seconded to accept the April 2010 meeting  
17 transcripts and voting record. Is there any  
18 debate? Madam Maker of the Motion, do you  
19 have any further debate on that?

20 MS. ELLOR: No, I do not.

21 MR. GIACOMINI: Any further  
22 debate? Seeing none, proceed to vote.

1                   Those in favor signify by saying  
2           aye.

3                   (Chorus of ayes.)

4                   MR. GIACOMINI: Opposed. Motion  
5           passes.

6                   I believe we are back live and in  
7           color. Yes, thumbs up from our Executive  
8           Director and that's good because now is when  
9           we were going to be needing the projector.

10                   Just so at some point in time,  
11           Lisa, we cannot really see that up here at  
12           all. If we could possibly get that twisted  
13           back just a little bit this way. Maybe at a  
14           break. Not right now, but at a break or if it  
15           gets too disruptive, maybe we'll have to do it  
16           during the -- can you see it at all, Joe?  
17           Okay. Tracy, are you guys okay? All right.

18  
19                   Back to the presentation on the  
20           National Organic Program, Miles McEvoy.

21                   MR. MCEVOY: It's been a very  
22           humbling experience to lead the National

1 Organic Program. I've learned a lot. I've  
2 learned that I guess a lot of the things that  
3 we thought we could get done very quickly, the  
4 Federal process kind of slows that down more  
5 than I initially thought. So, a lot of things  
6 that we thought we could get done are taking  
7 longer than we thought.

8 But, we are getting a lot of  
9 things done and it is very nice to have the  
10 support and input from the organic community  
11 and working with the National Organic  
12 Standards Board has been great. A very  
13 cooperative process and look forward to  
14 continuing that in the future.

15 So, part of what we did in this  
16 last year is we developed a strategic plan for  
17 the program and came up with this vision  
18 statement: Organic integrity from farm to  
19 table. Consumers trust the organic label and  
20 we really feel like this is the key of what it  
21 is about for the National Organic Program is  
22 verifying organic standards from the farm all

1 the way to the market, and we do that to make  
2 sure that consumers have confidence in the  
3 organic label and if they have confidence in  
4 the organic label, then the organic industry  
5 will continue to prosper and grow.

6 Okay. So, the priorities for the  
7 program, upholding and enforcing the  
8 standards. There's two parts of that.

9 Upholding the standards. We have  
10 standards. They need to be examined on a  
11 continuous basis to make sure that we're  
12 meeting the standards that are already in  
13 place and then enforcing the standards when  
14 people deviate from those standards.

15 Implementing and enforcing the  
16 access to pasture final rule. That's one of  
17 our priorities, our focuses this year. To  
18 make sure that after the publication of it,  
19 that certifiers and producers are implementing  
20 the rule and complying with the standards so  
21 that by June of next year, we'll have full  
22 implementation or full compliance.

1                   Implementing the strategic plan:  
2           I'll get into that a little bit more about  
3           what the components of the strategic plan are.

4                   Implementing the NOSB  
5           recommendations: It's pretty hard to keep up  
6           with the NOSB and there's a lot of old NOSB  
7           recommendations that we still need to work on  
8           to get those into either guidance or  
9           rulemaking over the next couple of years.

10                   Quality management system is  
11           really important. We spent a lot of time on  
12           this. Developing a quality manual. Where in  
13           the process of being evaluated by the National  
14           Institute of Standards and Technology to bring  
15           the program into compliance with ISO 17011.  
16           A very important component of our work at this  
17           point.

18                   Increasing oversight over foreign  
19           operations. We've done some things this year.  
20           We're going to continue that focus to make  
21           sure that foreign operations meet with NOP  
22           regulations just like domestic ones.

1                   And then training and  
2                   accountability of certifiers. A lot of work  
3                   to do with consistency of the application of  
4                   the standards.

5                   Some of the accomplishments: We  
6                   completed the quality manual, the program  
7                   handbook early September and the strategic  
8                   plan. We just recently published the draft  
9                   guidance on five draft guidance documents.  
10                  We've increased oversight of the domestic and  
11                  foreign certifying agents by doing additional  
12                  assessments in Ghana, China, and Mississippi  
13                  and then looking at access to pasture and some  
14                  poultry operations in Ohio and Maine.

15                  We've strengthened enforcement  
16                  procedures and then we've worked on  
17                  transparency and communication with the  
18                  publication of the NOP report to try to  
19                  describe some of the activities that the NOP  
20                  is up to so that people know what we're doing.  
21                  Then publicizing the suspended, reinstated,  
22                  and revoked operations and then also official

1 responses to the NOSB recommendations.

2 One of the things that we did  
3 recently this is an example of how we're  
4 trying to communicate with the organic  
5 communities is the NOP report from October of  
6 2010. The first article is about organic  
7 officials assessing certifiers in China.

8 We have a team, Ruihong Guo and  
9 Lars Crail that were over in China for almost  
10 a month. They did audits of four certifying  
11 agents and they went from the farm all the way  
12 to the port looking at all the different parts  
13 of the distribution chain and they took  
14 samples that are currently being analyzed at  
15 the Gastonia, North Carolina lab. So, a very  
16 comprehensive assessment of what's going on in  
17 China.

18 The reports that they have haven't  
19 been fully evaluated, but so far, they found  
20 a very good system in place. There's  
21 certainly a lot more work to do, continuing  
22 monitoring that needs to occur, but this is an



1 example, I guess, of some of the activities  
2 that we're doing to provide more oversight  
3 over foreign certifiers.

4 A little bit about the Office of  
5 Inspector General report. They did the audit  
6 of the National Organic Program in March of  
7 2001. So, a little bit of feedback in terms  
8 of how we've done on our corrective actions.  
9 There were seven findings in that report.

10 The first one was the NOP needs to  
11 improve enforcement. The second one  
12 processing of complaints needs to be more  
13 timely. The third one, oversight of  
14 California's State Organic Program was  
15 inadequate. The fourth was periodic residue  
16 testing was not implemented as required by the  
17 Organic Food Production Act. The fifth was  
18 peer review of the NOP accreditation had not  
19 been performed. The sixth was inconsistent  
20 program requirements and the seventh was  
21 audits of foreign certifiers had not been  
22 conducted.

1                   So, in terms of the 14  
2                   recommendations that came out of those seven  
3                   findings, for recommendations 1 to 6, all of  
4                   those are complete. They have to do with  
5                   enforcement and timeliness of handling  
6                   complaints.

7                   So, we haven't pursued all the  
8                   enforcement actions that were identified on  
9                   the audit. We've issued eight civil  
10                  penalties. We've improved the complaint  
11                  reporting and timeliness. We've implemented  
12                  procedures for monitoring and continuing  
13                  compliance with the regulations.

14                  So, once there is a noncompliance  
15                  that's determined, we don't just forget about  
16                  them. We go back and look to make sure that  
17                  they're continuing to be in compliance in the  
18                  subsequent year and we've resolved all the old  
19                  complaints.

20                  For number seven, the seventh  
21                  recommendation, that was concerning the  
22                  California State Organic Program, that's been

1 completed. We completed an audit in December  
2 of 2009. Had a number of findings that  
3 California had to fix in their program. They  
4 did that over the spring and we approved  
5 California, their new program, in spring of  
6 2010.

7 Number eight, periodic residue  
8 testing, that's in process. We were hoping to  
9 have the certifiers implement that this  
10 summer, but we found that we have to do that  
11 through rulemaking. So, we're working on  
12 proposed rules to require periodic residue  
13 testing by certifiers. We should have  
14 something out early next year.

15 And we also are working with the  
16 Science and Technology Program to conduct some  
17 pesticide residue testing this fall. They're  
18 looking at six various commodities. We have  
19 the results early next year on that. So,  
20 we've increase surveillance for residue  
21 testing.

22 Number nine, peer review panel.

1 This one has also been processed. The  
2 National Institute of Standards and Technology  
3 is conducting an assessment of the NOP Quality  
4 Management System. That's a first step in the  
5 relatively long process. That's a desk audit  
6 to start with to look at our quality manual  
7 and then they'll follow that up with some  
8 onsite witness audits over the next year.

9           Number ten, accreditation process.  
10 That's complete. We revised the NOP audit  
11 review criteria that's used by the ARC  
12 auditors to do the onsite audits of accredited  
13 certifiers and we've implemented an annual  
14 review process of the NOP audits. We're doing  
15 about 40 audits a year. So, what we do is we  
16 look at those audit reports to see what are  
17 the common patterns there, what are the common  
18 violations that certifiers are -- are being  
19 found during that accreditation audit. So, we  
20 can focus on that in terms of training or  
21 possibly clarification through guidance.

22           And then number 11, clarifying

1 program requirements. That's the program  
2 handbook and the draft guidance that's been  
3 published to provide more consistency and  
4 clear message about what the regulations mean.

5 Number 12, organic certificates.  
6 That's complete. We've published instructions  
7 on organic certificates in the program  
8 handbook and we've responded to the NOSB  
9 recommendations on standardizing certificates  
10 and expiration dates on certificates and then  
11 we have had to do rulemaking to actually  
12 require expiration dates on certificates.  
13 That's further down the road. Sometime in the  
14 next couple of years, we'll get to that.

15 Number 13, disseminating guidance  
16 in a standardized method. That's complete.  
17 That's the program handbook, the draft  
18 guidance and the policy memos.

19 And then number 14, improving  
20 oversight of foreign certifying agents.  
21 That's complete. All foreign audits of  
22 foreign certifying agents has been completed

1 at this point and we also did additional  
2 audits down in China.

3 We're not quite done with the last  
4 audit. So, they decided even though we're not  
5 quite done with the last audit, they'd start  
6 on another audit for us. So, last week, they  
7 started on a new OIG audit for organic milk.  
8 So, they're going to be looking at evaluating  
9 whether milk marketed as organic meets the NOP  
10 requirements and then assess the adequacy of  
11 the AMS, the Agricultural Marketing Services,  
12 oversight provided by the certifying agents.

13 So, some certifying agents will be  
14 contacted by the Office of the Inspector  
15 General over the next few months to see that  
16 they're properly certifying to the NOP  
17 requirements. So, that's -- the fun never  
18 stops at the NOP.

19 The strategic plan: It's on our  
20 website. It really spells out kind of what  
21 our goals and objectives are for the program.  
22 It's a relatively short strategic plan, 2010

1 through 2012. A lot of different activities  
2 in there.

3 So, as our vision statement or  
4 mission to the program is that NOP facilitates  
5 trade and insures integrity of organic  
6 agricultural products by consistently  
7 implementing organic standards and enforcing  
8 compliance with the regulations throughout the  
9 world. So, that important focus is  
10 consistently implementing the regulations,  
11 enforcing compliance and this is a global  
12 program. So, a lot of things to do with 30  
13 staff members.

14 So, the first goal is quality  
15 management. As I said, quality management is  
16 really important in terms of implementing a  
17 very comprehensive quality management system  
18 for the program. A lot of work still needs to  
19 be done there, but we've done a lot of work in  
20 this area. So, that's the quality manual  
21 alliance with ISO 17011.

22 The peer review by NIST and we're

1 doing this so that we're effective,  
2 consistent, efficient and also that this is  
3 scalable. Because the organic industry will  
4 continue to grow and we want to be able to  
5 continue to do the work in a quality fashion  
6 for a long period of time.

7 The second goal is around  
8 standards and consistency, developing and  
9 communicating clear and consistent NOP  
10 standards in a uniform manner. So, that's the  
11 program handbook. Guidance and instructions  
12 in the handbook.

13 Our policy memorandums. When we  
14 make a policy decision, we want to inform  
15 everybody, the certifiers, the state organic  
16 programs, the foreign recognized governments  
17 of the equivalency agreements all at the same  
18 time and also more training of certifying  
19 agents and we'll try to do that more through  
20 a webinar type format rather than having to  
21 always have certifiers go to a meeting. Do it  
22 through a webinar format so that they can get



1 access to that information at anytime.

2 The third major goal is around the  
3 accreditation and oversight, enhancing  
4 compliance with and enforcement of the organic  
5 regulations. These are the audits of the  
6 certifying agents, the concept of continuous  
7 improvement. During a quality system audit,  
8 you always find things that are identified.  
9 The certifiers have things that they need to  
10 improve in terms of their system.

11 Training and technical assistance  
12 since the other thing we're trying to provide  
13 is also technical assistance to certifiers so  
14 that they can be successful in their work.

15 The other side of that is also  
16 accountability, consistent application and  
17 implementation of the standards. So, that's  
18 where we go out and do the audits, do the  
19 additional assessments to make sure that  
20 certifiers are consistently applying the  
21 standards.

22 The fourth major goal is around

1 compliance and enforcement and ensuring  
2 consistent application of the NOP regulations  
3 by the ACAs, the certifiers, the state organic  
4 programs and via the international agreements.  
5 So, this is the complaint handling. A very  
6 important part of the process.

7 We only have 30 people. We need  
8 the help of the organic community to, when  
9 they identify things that don't look quite  
10 right, file a complaint and we'll investigate.

11 Then there's the investigation  
12 side of that. Civil penalties and penalty  
13 matrix when there are significant violations  
14 of the standards and also the whole due  
15 process part. Appeals, hearings, and making  
16 sure that people have their rights to defend  
17 themselves. That's all handled under that  
18 particular goal.

19 And then finally, a management  
20 strategy. Effectively managing the human  
21 resources, communication, and administrative  
22 activities of the NOP. So, that's working

1 with the National Organic Standards for the  
2 cost-share programs, our human resources that  
3 we have in the program, being cognizant of  
4 civil rights. A very important goal of the  
5 Vilsack Administration.

6 The Freedom of Information Act,  
7 making sure that when we get FOIA requests  
8 that we get the information out to people that  
9 are requesting that information. Trying to be  
10 as transparent as possible.

11 Just one little note about FOIA,  
12 we basically have one full-time staff that  
13 that's all they do. They work on FOIA  
14 requests. It's a very important part of our  
15 goals, our mission I guess as public servants,  
16 but it is a lot of work to go through the  
17 documents and get the information for the  
18 public.

19 A little bit about the structure  
20 of the program. We have the U.S. Department  
21 of Agriculture. There's Secretary Vilsack.

22 There are six mission areas within

1       USDA. We're in the Marketing and Regulatory  
2       Programs Mission Area. There are three  
3       agencies within the Marketing and Regulatory  
4       Program Mission Area. That's the Agricultural  
5       Marketing Service where the NOP is, the Animal  
6       Plant Health Inspection Service, APHIS, and  
7       the Grain Inspection, Packers, Stockyards  
8       Administration, GIPSA.

9                So, within AMS, the Agricultural  
10       Marketing Service, there are ten programs.  
11       The National Organic Program is the newest  
12       program within the Agricultural Marketing  
13       Service and also the smallest program within  
14       the Agricultural Marketing Service.

15               So, that's a little bit about the  
16       overarching structure of the National Organic  
17       Program.

18               This is a little small, but this  
19       shows the organizational structure of the  
20       National Organic Program. So, I report to the  
21       Administrator of the Agricultural Marketing  
22       Service and then you have a number of people

1 within the Office of the Deputy Administrator.

2 We have the National Organic Standards Board  
3 off to the upper left.

4 We have the Appeals Program which  
5 is separate from the programs. When there's  
6 an appeal from a proposed revocation or  
7 suspension, that goes into a separate part of  
8 the Agricultural Marketing Service and then we  
9 have the three divisions: Standards Division,  
10 Accreditation and International Activities,  
11 and Compliance and Enforcement Division.

12 Within the Accreditation and  
13 International Activities Division, they work  
14 very closely with the Audit Review and  
15 Compliance Branch of the Livestock and Seed  
16 Program. Those are the ones that do the  
17 audits of the certifying agents and we also  
18 have a Compliance Officer that works strictly  
19 on NOP issues in the AMS Compliance Program.

20 The budget of the program has  
21 grown significantly over the last few years.  
22 We've up to \$7 million for 2010. We're

1 operating under a Continuing Resolution  
2 through December 3rd. So, it's anybody's  
3 guess of what's going to happen in terms of  
4 the budget for this year. The President's  
5 budget includes \$10 million for the National  
6 Organic Program. So, that would be a \$3  
7 million enhancement, but it's really anybody's  
8 guess of whether or not we'll get that money  
9 this year or not. We could be operating under  
10 a Continuing Resolution for quite some time.  
11 So, could be a \$7 million budget again for  
12 2010.

13 New staff includes Melissa Bailey  
14 as the Standards Director, Betsy Rakola the  
15 Cost-Share Program Manager. Patricia Atkins  
16 is a new secretary that's starting with the  
17 program. We also have some details. John  
18 Punzi from Science and Technology is helping  
19 write the rules on pesticide residue testing  
20 and Lee Clyburn is back working with the  
21 program in the Accreditation Division to help  
22 out with quality system management.

1                   Public affairs: We get most of  
2                   the media attention in the Agricultural  
3                   Marketing Service -- well, maybe about half of  
4                   the media attention in the Agricultural  
5                   Marketing Service comes through the organic  
6                   programs. So, we have a full-time staff, Soo  
7                   Kim that just works on organic issues for AMS  
8                   and then Jeff Sotosky is the AMS Compliance  
9                   Officer that works on NOP issues.

10                   A little bit about the Organic  
11                   Certification Cost-Share Program: Eligibility  
12                   is all certified organic producers and  
13                   handlers within the U.S. The mechanism that  
14                   the Cost-Share Program operates under are  
15                   cooperative agreements with state agencies.  
16                   The total funding was \$6 million for this  
17                   particular fiscal year. That's how much we  
18                   potentially are providing to the states  
19                   through the Cost-Share Program. That's the  
20                   two different programs and it pays for 75  
21                   percent of certification costs to a maximum of  
22                   \$750 annually.

1                   The two programs are the  
2           Agricultural Management Assistance and the  
3           National Cost-Share Programs. The AMA has  
4           about -- well, has \$1.5 million annually from  
5           the Federal Crop Insurance Act. That's for,  
6           I think, around 11 states or 13 states that  
7           are part of that program and then the National  
8           Cost-Share Program has \$22 million allocated  
9           through the 2008 Farm Bill and so, both of  
10          those programs are operating.

11                   Betsy Rakola has put a lot of  
12          energy into that and our goal is to increase  
13          awareness and participation. So, we're  
14          working with the National Association of State  
15          Departments of Agriculture and the National  
16          Association of State Organic Programs to try  
17          to get the word out about the program and to  
18          increase participation.

19                   Currently, only about 45 percent  
20          of certified organic operations in the U.S.  
21          participate in the program. So, we're trying  
22          to significantly increase participation in



1 both of those programs.

2 New projects for the NOP: We're  
3 working with ATTRA on developing new organic  
4 system plans. As I mentioned, we have the  
5 pesticide residue testing and I guess we have  
6 an administrative conference call coming up.

7 So, yes, six commodities through  
8 that pesticide residue testing project.  
9 Results will be available in early 2011.

10 We're working with another  
11 contractor on a business process analysis.  
12 This is kind of developing the background  
13 information so we can develop a comprehensive  
14 database for the National Organic Program.  
15 We've developing a penalty matrix.

16 We have a new contract for  
17 technical reports. So, we're not just relying  
18 on Science and Technology. We have another  
19 contractor that we're working with. So, we  
20 should be able to -- there's been a lot of  
21 requests from the NOSB for additional  
22 technical reports. So, we have some more

1 resources that will be available this year to  
2 try to crank out additional technical reports.

3 We also have a contract to assist  
4 with rulemaking. We hope that will help us  
5 speed up the rulemaking process for a lot of  
6 the practice standards that we're working on.

7 And then we've been working with  
8 FDA -- collaborating with FDA on cosmetics.  
9 Trying to explore that issue and we've been  
10 looking at doing a market study later this  
11 year to look at the organic labeling of  
12 cosmetics issue.

13 Standards Division, Melissa Bailey  
14 is the Director. They do the rulemaking for  
15 practice standards in the National List. The  
16 program handbook comes out of that division.  
17 The National List, there's a lot of different  
18 components of that. There's a petition  
19 process. There's the technical reports and  
20 there's the sunset review process which the  
21 National Organic Standards Board does.

22 So, they're responsible for

1       interpretations, providing consistency to  
2       certifiers and also to certified operations.

3               That program handbook has two  
4       major parts. The guidance part which is a  
5       clarification on existing regulations. So,  
6       that includes things like the organic  
7       certificates and liquid fertilizer guidance.

8               Then it has an instructions or  
9       procedures part, and that's information to  
10      certifiers concerning for instance  
11      accreditation requirements or certification  
12      procedures. Those instructions include  
13      responsibilities of certified operations when  
14      they're changing certifying agents,  
15      accreditation procedures, how a certifier  
16      would apply for accreditation and our  
17      enforcement policy.

18              So, it's a guidance. The process  
19      is that if it was an old guidance, it went  
20      immediately into the program handbook, but new  
21      guidance we publish as a draft guidance, 60-  
22      day comment period, evaluate those comments

1 and then it goes into the manual as final  
2 guidance.

3 If it's an instruction or  
4 procedures, then it goes immediately into the  
5 handbook.

6 How do we determine whether it's  
7 guidance or instructions or procedures? We do  
8 the best we can. We figure what is it that's  
9 an interpretation of the standard that needs  
10 public comment versus what is just explaining  
11 what already is a procedure that just needs to  
12 be explained. So, it's not pure science, but  
13 it's how we do it.

14 Draft guidance. As I said, we  
15 have five new draft guidance items out, wild  
16 crop certification, compost, chlorine,  
17 commingling and access for poultry and that  
18 comment period I think is open until mid-  
19 December and then under development, nutrient,  
20 vitamins and minerals and made with organic  
21 ingredients are the two big ones. We also  
22 have a number of other ones that we're working

1 on, but those are the two big ones that we  
2 hope to have out by early next year.

3 They're both in clearance now.  
4 Right? Yes, both of those, nutrient, vitamins  
5 and minerals and made with organic ingredients  
6 are in clearance.

7 Rulemaking. As I said, pesticide  
8 residue testing is probably the next one  
9 that's going to come out on the National List  
10 docket.

11 Origin of livestock will be the  
12 primary focus for 2011. We certainly hope to  
13 get a proposed rule out on origin of livestock  
14 in 2011.

15 We're also working on streamlining  
16 the appeals process -- and I'll talk about  
17 that a little later -- and then we have some  
18 larger practice standard dockets: apiculture,  
19 mushrooms, pet food, aquaculture in  
20 greenhouses. They all need to be worked on.  
21 It's unknown of when we're going to get to  
22 those particular items.

1                   Access to pasture implementation.

2       We notified certifiers that full assessments

3       for compliance with the new pasture rule needs

4       to occur during the 2010 grazing season. I

5       think that organic dairy producers, organic

6       ruminant operations really need to have that

7       full assessment of whether or not they're in

8       compliance this year, whether or not they have

9       an adequate grazing season, whether the

10      records are adequate, whether or not they're

11      meeting the 30 percent dry matter intake

12      requirement. They really need to get that

13      information this year. So, if they're not

14      meeting it, they can make changes to their

15      operation prior to June of 2011.

16                   So, certifiers have been notified

17      that they need to do that and, as far as we

18      can tell, they are.

19                   The NOP is also conducting

20      assessments during this implementation period.

21      We've been out to a few different operations

22      around, mostly in the Northeast and Midwest.

1 We'll continue that through the winter to see  
2 how the implementation of the new pasture rule  
3 is going.

4 In terms of made-with organic  
5 labeling, last year when I reported on this,  
6 we talked about organic and the brand name on  
7 the principal display panel for made-with  
8 organic labeling. We tried to develop  
9 guidance for that and we determined that we  
10 can't address that issue through guidance.  
11 That's going to have to be rulemaking.

12 So, we are coming out with made-  
13 with organic labeling guidance, but it's only  
14 going to address two issues, and that's the  
15 guidance for percentage claims on the  
16 principal display panel and what goes into  
17 that 30 percent. So, that will come out early  
18 next year.

19 And in terms of organic in the  
20 brand name, that's going to be a separate  
21 rulemaking docket. I'm not sure when we're  
22 going to get to that one.

1                   Moving on to the Accreditation and  
2 International Activities Division, Ruihong Guo  
3 is the new director. We did do a switch  
4 earlier this summer. Ruihong Guo used to be  
5 with the Compliance and Enforcement Division.  
6 She's now the Director of Accreditation, and  
7 Mark Bradley is now the Division Director,  
8 Compliance and Enforcement.

9                   There's about 95 accredited  
10 certifying agents. They do the audits of the  
11 certifying agents. There's a number of  
12 different audits that are done: Pre-  
13 decisional, post-decisional, midterm, renewal  
14 audits and also compliance audits. Where  
15 there are significant findings or  
16 noncompliances during an audit, we'll do  
17 additional compliance audits.

18                   They also are responsible for the  
19 state organic programs -- or for the  
20 California State Organic Program, because  
21 that's the only one at this point.

22                   They also do reinstatements and



1 temporary variances. Temporary variances are  
2 probably going to become a little more  
3 critical with the Access to Pasture Rule.

4 They also handle the recognition  
5 agreements and their equivalency arrangements.  
6 We have six recognition agreements, and they  
7 need to be assessed every two years.

8 We also have the equivalency  
9 arrangement with Canada. We conducted an  
10 assessment of Canada in September, and they're  
11 coming to assess the NOP in December. So,  
12 that's a peer-review type of assessment.

13 Some of the new initiatives in  
14 this division -- audits prior to new  
15 accreditation. So, there are pre-decisional  
16 audits being conducted. Additional audits  
17 were done.

18 Increase the accountability of  
19 certifiers in terms of their annual updates,  
20 their adverse action notices. We're reviewing  
21 them for compliance with the procedures, and  
22 the lists of certified operations need to be

1 submitted on time, and we also have the  
2 organic harmonized trade codes.

3 Mark, are you going to address  
4 that in more detail? Okay. So, Mark will  
5 talk more about the organic harmonized trade  
6 codes.

7 Moving on to the Compliance and  
8 Enforcement Division, Mark Bradley's the  
9 Director.

10 New and revised procedures for  
11 complaint handling. The goal is to close  
12 cases within 180 days. We still have a lot of  
13 work to do to reach that goal, but that is the  
14 goal. To close those complaints within 180  
15 days.

16 Enforcement policy. Enforcement  
17 actions. Follow-up monitoring, civil penalty  
18 procedures and publication of penalty matrix  
19 developments. I already covered a lot of  
20 those things.

21 So, age of enforcement. We're  
22 still in the age of enforcement. Eventually,

1 we'll be in some other age -- beyond the age  
2 of enforcement. But, we still have a lot of  
3 enforcement types of things to do. So, I'd  
4 say at least probably another year of  
5 enforcement. Then we'll move on to  
6 assistance. Slack off a little bit or  
7 something. We'll never slack off.

8 Okay. So, we are doing more civil  
9 penalties. We have three additional  
10 compliance officers. We revised the  
11 enforcement procedures, and we have a proposal  
12 to streamline the appeals process. So, part  
13 of the problem in enforcement is that there's  
14 this very lengthy appeals process.

15 So, one of the parts of the rule  
16 in 681 is that certifiers -- when the NOP  
17 takes action to propose suspension or  
18 revocation against a certifier, they can  
19 appeal to NOP Appeals. The odd thing there is  
20 that the NOP is basically part of the AMS  
21 administration, and we're proposing to revoke  
22 or suspend that certifier's accreditation, and

1 that appeal goes to the same agricultural  
2 marketing service.

3 When other USDA programs are  
4 taking action against an operation, they don't  
5 have a separate appeals process. They  
6 immediately go to the complaint process and  
7 administrative hearings process.

8 So, what we're proposing is to  
9 eliminate that step. It still allows the  
10 certifier to appeal and have an administrative  
11 hearing, but it would streamline the process,  
12 eliminate one of the steps in the process. So  
13 that when a certifier is not properly  
14 implementing the NOP regulations, we can get  
15 them suspended or revoked more quickly. So,  
16 that's a proposal that we're working on.

17 In terms of civil penalties, any  
18 operation that knowingly sells or labels a  
19 product as organic except in accordance with  
20 the Act shall be subject to a civil penalty of  
21 not more than \$11,000 per violation. Per  
22 violation may be defined as, but not limited

1 to, per regulatory citation violated per  
2 purchase order, per invoice, per bill of  
3 lading, per shipment, per box, per product,  
4 per package.

5 So, even though it's \$11,000 per  
6 violation, if we have multiple invoices and we  
7 see that an operation has made multiple  
8 fraudulent sales of conventional products as  
9 organic, the civil penalty could be quite  
10 significant.

11 And how we determine how we count  
12 those violations and how we propose what the  
13 penalty will be is based on how significant  
14 the violation is. How much product did they  
15 willingly sell, label or represent as organic  
16 that is not?

17 So, a minor noncompliance. We  
18 define a minor noncompliance as a violation  
19 that is correctable. That's the part of the  
20 process of the notice of noncompliance where  
21 the operation can propose corrective actions  
22 or can rebut the noncompliance. It does not

1 affect the integrity of the organic system or  
2 the organic product and does not preclude the  
3 certification or continued certification of an  
4 otherwise qualified organic producer or  
5 handler.

6 Examples of minor noncompliance  
7 include failure to submit information on time.  
8 Very common. Failure to update the organic  
9 system plan and inadequate recordkeeping.

10 So, certifiers are issuing many  
11 notices of noncompliance for basically  
12 administrative violations, and that's a very  
13 important part of the process, but that's a  
14 minor noncompliance. It doesn't affect the  
15 integrity.

16 A major noncompliance is defined  
17 as a violation of the standard that does  
18 affect the integrity of the organic system or  
19 the organic product and precludes the  
20 certification or continued certification of  
21 the producer or handler.

22 Examples include the application

1 of a prohibited substance. You can't correct  
2 that. You apply a prohibited substance --  
3 that's a major violation.

4 Commingling of organic and  
5 nonorganic products would be a noncorrectable  
6 violation.

7 Contamination of organic products  
8 with prohibited substances and the failure to  
9 correct a minor noncompliance can lead to a  
10 major noncompliance.

11 And then finally, there's a -- we  
12 want to make a distinction around a willful  
13 violation. It refers to the intentional  
14 violation of the Act or plan, or plain  
15 indifference to the requirements. And for  
16 willful violations, that's where we're using  
17 the civil penalties.

18 So, we issued eight civil  
19 penalties in 2010. Six were issued to  
20 noncertified operations for making organic  
21 claims. Two were issued to certified  
22 operations. One was using nonorganic seeds in

1 an organic sprouting operation, and the other  
2 one was using organic ingredients with a  
3 falsified certificate.

4 So, our enforcement policy -- the  
5 NOP has noted that there were problems with  
6 the investigations and enforcement procedures  
7 that certifiers were taking. We saw that some  
8 certifiers -- when we get a complaint, if it's  
9 against a certified operation, in the past,  
10 what we did was we referred it to the  
11 certifier, and the certifier would do the  
12 enforcement action. What we found is that  
13 some certifiers were doing inadequate  
14 investigations, and they weren't following the  
15 standard procedures. They were making  
16 mistakes in the adverse action procedures.

17 So, what we decided to do was to  
18 monitor more closely how this process works.  
19 So, when we get a complaint, we will normally  
20 refer it to the certifier. We'll have the  
21 certifier have a report of investigation back  
22 to us. We'll determine whether or not there



1 is willfull or egregious violations.

2 If there are, then we can file the  
3 complaint and look at civil penalties. If  
4 it's a minor violation, then we'll let the  
5 certifier handle it, and then they can do a  
6 notice of noncompliance and follow their  
7 procedures.

8 So, it's more oversight over how  
9 the certifiers are doing the investigations,  
10 collaborating with them on the investigations  
11 and then collaborating with them on the  
12 enforcement action. Make sure that it's done  
13 consistently and effectively.

14 So, we also are working with other  
15 authorities on those investigations, with EPA,  
16 FDA and state authorities when those types of  
17 things are warranted and -- okay.

18 So, moving on here because I'm  
19 probably -- how am I doing on time? I'm doing  
20 fine. Okay. Good.

21 So, some of the positive trends  
22 that we have noted is that certifiers in

1 general are very effective in protecting  
2 organic integrity in the majority of  
3 situations. We have a very, very good system.  
4 The organic certification system is a very  
5 strong and effective system to protect organic  
6 integrity in most situations.

7 The vast majority of organic  
8 operations comply with the organic standards.  
9 So, that's very good news.

10 And that the samples that we have  
11 evaluated are generally free of pesticide  
12 residues. So, I know there's some fear about  
13 this -- the use of pesticide residue testing  
14 and what we're going to find. The limited  
15 information that we have is that, in general,  
16 when you test, we're getting produce -- when  
17 you test, we're getting products -- you don't  
18 find residues.

19 Over the last 16 years, the  
20 Agricultural Marketing Service Pesticide Data  
21 Program has tested 1351 organic samples,  
22 mostly of fruits and vegetables, representing

1 1.3 percent of the total number of samples  
2 that they tested, which was over 100,000  
3 samples. So, this is part of a normal market  
4 surveillance program done by the Agricultural  
5 Marketing Service as part of its pesticide  
6 data program.

7 And what they found -- and this is  
8 an analysis from the Organic Center that came  
9 up with these -- used the USDA AMS data, but  
10 the Organic Center did the analysis -- and  
11 from their analysis, the trend that they've  
12 seen over the 16 years is that the average  
13 risk associated with pesticide residues in  
14 organic foods seems to be declining. I think  
15 they have a more robust report that they will  
16 be publishing sometime this winter. I don't  
17 know exactly when, but they do have an  
18 analysis of this data that they've analyzed  
19 over the last 16 years.

20 Forty-three out of those 1351  
21 organic samples -- that's 3.2 percent --  
22 contain residues above 5 percent of the EPA

1 tolerance level. So, you would say that well,  
2 that looks like about 97 percent of the  
3 samples had less than 5 percent, but 3 percent  
4 had more than 5 percent. So, there's some  
5 problem out there. We can't put our heads in  
6 the sand. We need to look at where these  
7 residues come from, why do we have residues  
8 above 5 percent of the EPA tolerance level,  
9 and get those things out of the organic market  
10 stream.

11 Sixty-three out of the 1351  
12 samples -- or 4.7 percent -- had residues from  
13 what the Organic Center defined as inadvertent  
14 sources. They were below tolerance and, by  
15 this analysis that they did, they determined  
16 that they weren't directly applied. So, they  
17 determined that the 4.7 percent were residues  
18 from residual soil contamination. For  
19 instance, fluoridated hydrocarbon or from  
20 spray drip. So, more work needs to be done,  
21 but this gives you a little bit of data of  
22 what's found on pesticide residues.

1           Okay. A little summary of -- I  
2           guess some of the limitations and the  
3           overarching program that we're implementing.  
4           So, first of all, subpoena authority is  
5           lacking in the Organic Food Production Act.  
6           Certifiers and NOP do not have the authority  
7           to subpoena records.

8           So, if you know the Promiseland  
9           case, we received a complaint. The NOP tried  
10          to obtain records that are required under the  
11          National Organic Program Regulations.  
12          Promiseland refused to provide those records,  
13          and that's gone through a lengthy appeals  
14          process, but every step of the way, the USDA's  
15          action, AMS's action, has been upheld. But,  
16          we don't have authority to look at those  
17          records. So, we don't even -- we've never  
18          seen these records at this point because we  
19          don't have subpoena authority.

20          So, that would be one thing that  
21          limits our authority to enforce the standards  
22          -- is that lack of that authority to subpoena

1 the records.

2 We also have that lengthy appeals  
3 process that I already referred to and, for  
4 willfull violations, the NOP is going directly  
5 to filing complaints to assess civil penalties  
6 and avoid the mediation and appeals process  
7 that certifiers have to go through. So, we're  
8 already implementing that particular action,  
9 to go directly to the complaint phase.

10 There's still administrative  
11 hearings in that complaint phase. That's what  
12 we have to do, provide due process. But, we  
13 are going directly to the complaint phase, and  
14 then we also are proposing to delete the  
15 requirements that certifiers can appeal  
16 adverse actions to the AMS administrator.

17 And then finally, a limitation --  
18 I would say -- is on input approval. We don't  
19 have any kind of accreditation program for  
20 input approval programs. So, we don't have an  
21 accreditation program for ENRI, for instance,  
22 or with the USDA branding program.

1                   So, we need to look at that. How  
2 do we have authority or oversight over these  
3 input approval programs?

4                   There's also foreign input  
5 approval programs. A lot of foreign  
6 certifiers -- BCS, some of the Central  
7 American certifiers -- have input approval  
8 programs. We want to make sure that they're  
9 all being done in a consistent fashion, so  
10 that the inputs that are approved are the same  
11 by all certifiers.

12                  Okay. So in terms of protecting  
13 organic integrity, first and foremost, clear  
14 enforceable standards are important.  
15 Producers and handlers need to know what those  
16 standards are. If they understand the  
17 standards, then it's much easier for them to  
18 comply with the standards. If they don't know  
19 what they are, it's very uncomfortable, and  
20 it's difficult to comply.

21                  Number two, notification to  
22 certifiers, organic producers and handlers

1 concerning any changes or clarifications to  
2 the standard. When we do that, when we make  
3 a policy announcement or draft guidance or  
4 rulemaking, we want to notify everybody at the  
5 same time. All the certifiers, all the state  
6 organic programs, all the foreign governments,  
7 so everybody gets the same information.

8 Transparency of the suspensions  
9 and the revocations and the adverse actions  
10 and the sanctions. That needs to be provided,  
11 so that the bad actors out there -- they don't  
12 get a pass. They are on some kind of public  
13 display, I guess, or public list that you can  
14 see: okay, these people have been suspended,  
15 or these people have been revoked and are no  
16 longer part of the certified organic group.

17 Number four, a qualified  
18 verification process. So, this is the heart  
19 and soul, I guess, of the organic verification  
20 system, organic certification.

21 Organic system plans, they need to  
22 be thorough and complete. There needs to be



1 a quality review of those plans by the  
2 certifiers. Sometimes certifiers are  
3 receiving the plans and then forwarding them  
4 directly to the inspectors. That should not  
5 happen.

6 The certifiers need to have the  
7 qualification and the expertise to review  
8 those plans, make sure that they're thorough  
9 and complete before they're passed on to the  
10 inspector. And then the inspections need to  
11 be done by qualified and skilled auditors, and  
12 they need to be thorough and complete. They  
13 need to include sales and yield audits and  
14 feed audits.

15 This is a serious business, and  
16 inspectors need to be qualified and thorough  
17 in the work that they do. They need to spend  
18 the time to do the work. Sometimes an audit  
19 might be scheduled for two hours, but you  
20 might end up there all day, because it just  
21 takes a long time to do it.

22 Inspection of nonorganic areas of

1 the operation is important to include in the  
2 inspections. And then the certifiers need to  
3 do timely notices. So that after the  
4 inspection is done, if there are findings,  
5 that the certified operation gets those  
6 findings in a timely basis, and when they  
7 submit their corrective actions that the  
8 certifier reviews those corrective actions.  
9 So, you don't have those long time frames from  
10 the inspection to when there's a compliance  
11 action taken.

12 Number five, complaint handling.

13 This is a very important part of the --  
14 protecting organic integrity. We encourage  
15 people to file complaints at  
16 NOPcompliance@USDA.gov. Our complaint process  
17 needs to be effective and timely and thorough.  
18 We have a lot of work to do there. We have a  
19 lot of complaints that we're still working on.  
20 And thorough investigations by qualified  
21 investigators.

22 And the other thing we have to

1 remember about complaints is that the  
2 allegations can be confirmed, or they can be  
3 determined to have no substance, have no  
4 basis. So, I've certainly seen, in my career,  
5 people being accused of things that have no  
6 basis in fact, and we find out that there's  
7 some kind of divorce going on, or some kind of  
8 family dispute going on, that has led to the  
9 complaints.

10 So, part of the complaint is  
11 finding violations, but part of it is also  
12 exonerating the people that have been accused  
13 of things.

14 Number six, penalties for local  
15 violations. A very important part of the  
16 process. Market surveillance, that we should  
17 be doing more market surveillance to see how  
18 products are properly labeled in the  
19 marketplace. Unannounced inspections that are  
20 risk-based. We need to incorporate that more  
21 and more into the process of protecting  
22 organic integrity.

1                   Number nine, periodic pesticide  
2                   residue testing. So, it's just one of the  
3                   tools that we're using to provide surveillance  
4                   from that information, to protect organic  
5                   integrity.

6                   Number ten, monitoring the use of  
7                   organic-like claims and take action as  
8                   appropriate to protect the organic label.  
9                   This is a very challenging area. We have  
10                  people that are playing around with the word  
11                  organic. Trying to make organic-like claims,  
12                  but avoiding the certified organic process.  
13                  So, we need to monitor that and make sure that  
14                  we protect the organic claim.

15                  Number 11, improve the quality of  
16                  inspections and certifiers through training  
17                  and testing. Making sure that conflict-of-  
18                  interest is dealt with, and there's almost  
19                  this inherent funding conflict with certifiers  
20                  --where they're relying on the fees provided  
21                  by their clients to provide the revenue to do  
22                  the work -- and we got to make sure that that

1 doesn't provide a conflict.

2           And then there's also the  
3 challenge that a lot of certifiers have  
4 limited resources. So, they're reluctant to  
5 raise their fees to improve services and --  
6 obviously -- certified organic operations,  
7 producers and handlers, they don't want their  
8 fees raised either, but to protect organic  
9 integrity does take resources, does take time,  
10 takes qualified inspectors. We have to make  
11 sure that we have enough financial resources -  
12 - that certifiers have enough financial  
13 resources to do a qualified job.

14           Okay. That's that part. Now,  
15 we'll move on to the NOSB recommendations from  
16 April. We got a couple more minutes. I  
17 guess. Maybe? Okay.

18           So, we have a written response to  
19 the April NOSB recommendations. You can read  
20 the full response on the NOP website.

21           Sunset 2011, Sunset 2012,  
22 everything's good there.

1                   We have published a defining  
2 interim rule. The comment period closes  
3 today, October 25th, 2010, and we will have a  
4 final rule out on the finding by March of  
5 2011.

6                   We are concerned about the  
7 stepdown and we have requested that the NOSB,  
8 if you can, can provide us with more  
9 justification for the stepdown numbers. Any  
10 information that you could provide would help  
11 us.

12                   We know we're going to have  
13 problems with this with the Office of  
14 Management and Budget and if we do have  
15 problems in the rulemaking what could happen  
16 is that we're unsuccessful in meeting the  
17 timeframe for getting the methionine stepdown  
18 implemented and that would mean that as of  
19 October 1st, 2012, if we don't complete the  
20 rulemaking, that methionine would no longer be  
21 allowed.

22                   So, we have some concerns about

1 our ability to get that through the process.  
2 We will be working on that. As soon as we  
3 finish the final rule on methionine, we'll  
4 start working on the proposed rule for the  
5 stepdown, but any additional information that  
6 can be provided would be very helpful for us  
7 to work through that process.

8 Clarification on the livestock  
9 health care. Organic calves fed organic milk  
10 treated with an allowed synthetic input. NOP  
11 accepts the NOSB clarification on that for  
12 your final recommendation.

13 For inerts and pesticides, NOP is  
14 collaborating with EPA. We had a meeting with  
15 them last week on establishing this Memorandum  
16 of Understanding. They are very interested in  
17 working with us to provide more information to  
18 help with the review criteria for the inerts.  
19 There's a lot of good ideas and a lot of  
20 interest in collaborating with the NOSB on  
21 that whole inerts review process.

22 And just one thing to recognize is

1 that the NOP regulations are very much more  
2 prescriptive than any other foreign organic  
3 standard. Most foreign organic standards do  
4 not regulate inerts. They allow inerts to be  
5 used as long as they're approved by their  
6 country's environmental agency.

7 Greenhouse recommendation was  
8 accepted. Inert atmospheric gases. We  
9 questioned the recommendation to call these  
10 packaging aids this new term. Don't accept  
11 that new term. Gases are regulated by FDA as  
12 direct food substances, not as packaging or  
13 packaging aids. So, we don't want to conflict  
14 with FDA regulations on creating a new term.

15 Nitrogen and carbon dioxide are  
16 allowed. Argon is not listed on the National  
17 List, so is not allowed. I just want to  
18 clarify that.

19 Classification of materials. A  
20 lot of good work on this, but we feel like  
21 additional work is needed. We feel that the  
22 classification of materials is related to the



1 category of use. So if it's used for crop  
2 production, you have one set of questions.  
3 Livestock production is a different set of  
4 questions. Handling, a different set of  
5 questions.

6 So, if it's crops and livestock,  
7 the main question is whether it's synthetic or  
8 natural and for processing, for ingredients in  
9 processing aids, it seems like the first  
10 question is whether the substance is  
11 agricultural or nonagricultural. That's the  
12 most critical question and then after that,  
13 whether it's synthetic or non-synthetic.

14 So for crops and livestock, it  
15 doesn't really matter whether it's  
16 agricultural or nonagricultural. I guess for  
17 livestock feed it does, but for crop input,  
18 fertilizer and pesticide, really the question  
19 is whether it's synthetic or natural.

20 And then we also didn't accept the  
21 chemical change definition because it  
22 conflicts with common understanding of

1 chemical change and that would just be more  
2 rulemaking to have a definition that conflicts  
3 with common understanding of what chemical  
4 change is.

5 For vaccines, 205.105(e) prohibits  
6 excluded methods, genetically-modified  
7 organisms, but it does say vaccines produced  
8 through excluded methods may be allowed if  
9 they're approved according to 205.600(a). So  
10 you're all familiar with 205.600(a).

11 There's a specific set of  
12 questions there that the NOSB is responsible  
13 for reviewing and our understanding is the  
14 NOSB has not approved vaccines produced  
15 through excluded methods according to  
16 205.600(a). So, therefore, GMO vaccines are  
17 currently not allowed and that the NOSB  
18 probably will want to put that on your work  
19 plan to look at GMO vaccines under 205.600(a)  
20 and we would think that a good way to do that  
21 would be to look at that as a class of  
22 substances rather than individual vaccines.

1                   So, sorry about that, but that's  
2                   the way that that one came out.

3                   Sodium nitrate: we're asking the  
4                   National Organics Standards Board to look at  
5                   sodium nitrate. It's currently a prohibited  
6                   substance, but is allowed to have 20 percent  
7                   of the total nitrogen needs of the crop.

8                   The U.S. Organic Standards are the  
9                   only organic standards in the world that I'm  
10                  aware of that allow the use of sodium nitrate.  
11                  The high sodium content in sodium nitrate can  
12                  negatively affect soil quality. This  
13                  allowance of sodium nitrate really affects  
14                  U.S. producers' ability to access foreign  
15                  organic markets.

16                  So we're requesting that the NOP  
17                  review the allowance of sodium nitrate for  
18                  potential consideration of getting rid of the  
19                  exemption.

20                  And then final point was in terms  
21                  of corn steep liquor or any other substance,  
22                  we're talking about non-sunset substances

1 here. But, substances that are generally  
2 allowed under the organic standards like corn  
3 steep liquor. We think that there needs to be  
4 certain guidelines of what happens if the  
5 Board votes to consider corn steep liquor as  
6 synthetic. What is the notification process  
7 and the process for removing that as an input  
8 material?

9 So, first of all, we need to  
10 notify all the affected parties and we would  
11 suggest that there be 120 days to notify all  
12 affected parties. The NOP would notify  
13 certifiers, state organic programs, foreign  
14 governments, within 60 days and then tell them  
15 that they need to notify their certified  
16 operations and clients within 60 days. So,  
17 within 120 days, there's been notification  
18 that these products are no longer allowed.

19 But we would also suggest that for  
20 a previously allowed substance that there be  
21 a two-year phase-in period. Because there's  
22 people that have bought these products, have

1 the products on their farm or in their  
2 processing facility. With corn steep liquor  
3 or any other substance, there's the  
4 ingredients in inputs that have been approved,  
5 that have approved labels on them, ENRI-  
6 approved labels.

7 It's just going to take awhile for  
8 these products to be taken out of the stream  
9 of commerce. I guess the stream of commerce  
10 of inputs and so what we're suggesting is the  
11 guidelines that the NOSB should consider are  
12 a two-year phase-out for when there are these  
13 allowed substances that are moving to  
14 prohibited process.

15 So that ends my comments. Again,  
16 organic integrity from farm to table.  
17 Consumers trust the organic label and I guess  
18 questions and then we'll have Mark.

19 MR. GIACOMINI: Any questions for  
20 -- Joe.

21 MR. SMILLIE: Miles, I think that  
22 the NOP has obviously done a very vigorous and

1 robust job on the accreditation system.

2 You've really jacked it up. It's in place and  
3 especially for, you know, domestic certifiers  
4 and foreign certifiers. I think that's moving  
5 along really well.

6 My question is, could you  
7 elaborate a bit more on 205.500(c)(1), which  
8 is your relationship with foreign governments  
9 that allows them to accredit their certifiers  
10 for application and compliance to the U.S.  
11 regulation? Could you give us a better idea  
12 of how you go about making sure that foreign  
13 governments when they accredit or approve, I  
14 think is a better word, their certifiers to  
15 conduct NOP certifications? How do you  
16 interact with a foreign government and make  
17 sure that their instructions to their  
18 certifiers are as vigorous and as robust as  
19 what you do?

20 MR. MCEVOY: Looking at their  
21 accreditation system. So, the foreign  
22 government would have to have an accreditation

1 program to accredit the certifiers that are  
2 operating within that country.

3 So when we assess their program,  
4 we're looking at their accreditation system  
5 over their certifiers. So the certifiers that  
6 are operating in that respective country have  
7 to have a program to certify to the NOP  
8 standards.

9 So, for the most part, we look at  
10 the UK or Denmark or Israel. Most of the  
11 certifiers operating in those countries are  
12 certifying to their -- the European regulation  
13 would be first and the NOP would be an add-on.

14 So you have the competent  
15 authority of the accreditation body that is  
16 operating -- is basically analogous to the NOP  
17 within those countries that is overseeing the  
18 certifiers operating within those countries.

19 So it's a similar length of time  
20 as auditing a certifier when you do an  
21 assessment of that foreign government. So, we  
22 go -- we work with the -- we assess the

1 foreign government's accreditation program.

2 We do witness audits to see how the certifier  
3 is implementing the NOP regulations.

4 There are findings that are found  
5 as part of this process and they have to make  
6 corrective actions to address those particular  
7 findings. So it's kind of a similar process  
8 as a regular audit of a certifier with  
9 findings and corrective actions.

10 And I guess one of the differences  
11 is if they are not in compliance with the NOP  
12 regulations, they don't have the same rights  
13 in terms of a notice of proposed revocation or  
14 suspension. We would just end the  
15 relationship with the foreign government.

16 MR. GIACOMINI: Further questions  
17 or comments for Miles?

18 MS. MIEDEMA: Thank you, Mr.  
19 Deputy Administrator.

20 I have a question and this relates  
21 to the NOP response to the spring  
22 recommendation. Not to get too far into the



1       specifics of the request that came back on  
2       methionine, but the request came in for  
3       additional economic justification and  
4       scientific justification and I wondered  
5       whether you see that as a more broad trend  
6       that will be imposed on this Board for our  
7       recommendations going forward or whether this  
8       was more one particular instance?

9                   MR. MCEVOY:  What we will try to  
10       do is to implement rulemaking recommendations  
11       on the National List.  The more information  
12       you can provide, the easier it is for us to  
13       implement your recommendations.

14                   So the particular part on the  
15       methionine is the stepdown.  Where are we  
16       going to explain to all the different parties  
17       that we have to explain to through this  
18       clearance process?  In particular, Office of  
19       General Counsel, EPA, Office of Business and  
20       Processing Analysis.  Office of Management and  
21       Budget in particular.

22                   You know, we're going to say,

1       okay, here's the stepdown, which is half of  
2       what it was. Why did you come up with these  
3       numbers? How did you come up with these  
4       numbers? And we won't be able to say more  
5       than well, the NOSB said that this is what  
6       they wanted.

7                    If there was testimony, if there  
8       were comments that were made, if there was  
9       some kind of scientific literature or economic  
10      justification for those particular numbers, it  
11      will make the process just a lot easier to  
12      move through.

13                   So that's our request is, when  
14      you're making specific metrics in your  
15      recommendations, the more justification for  
16      the actual numbers that you come up with will  
17      make it easier to succeed in getting your  
18      recommendations through the rulemaking  
19      process. Yes.

20                   MR. GIACOMINI: Kevin.

21                   MR. ENGELBERT: Thank you, Miles.

22                   The NOSB, we've always assumed,

1 was the authority on materials and the  
2 committee is somewhat concerned about the need  
3 to justify our recommendation to OMB and  
4 anyone else and as Dan pointed out on a call,  
5 if we had made the recommendation to simply  
6 allow this to sunset, would you have had the  
7 same response?

8 MR. MCEVOY: Well, if you had made  
9 the recommendation for it to sunset, then,  
10 right, there wouldn't be the same response.  
11 Because the reason why we're asking for more  
12 information is because you set specific  
13 amounts of methionine. If you had just asked  
14 for it to be sunsetted, then we would then go  
15 through the rulemaking to have it come off the  
16 list.

17 So what we're trying to do here is  
18 to honor what the NOSB wants to happen with  
19 the National List and any additional  
20 information you can provide that justifies the  
21 numbers or justifies the action that you've  
22 provided. In general, you do do that. So,

1 that's why we can move things through.

2 But we run into problems with  
3 justifying the rulemaking with the people that  
4 we have to get this through clearance with.

5 MR. GIACOMINI: I just have to  
6 question that, Miles. I don't know what the  
7 science and the background was to put the 20  
8 percent on sodium nitrate. I don't know what  
9 it was that put the limit on the pesticides  
10 and I think expecting this kind of -- this  
11 level of detail out of this Board, number one,  
12 we don't have the resources.

13 We make phone calls. We talk to  
14 people in confidence and they give us  
15 information that otherwise wouldn't be public.

16 We can't -- we don't have the  
17 scientific ability to compile that, and with  
18 error and statistical variation, and to  
19 announce where that came from. We're either  
20 not going to get people to talk to us any more  
21 or in the situation, like I said at the last  
22 meeting, where I talked to feed mills and some

1 of them were already using half the amounts of  
2 what they were asking for now. Which were  
3 basically the source of the numbers that we  
4 came up with. We didn't just pull them out of  
5 the air.

6 That if I had said, okay, this is  
7 the feed mill that said that, that feed mill  
8 could be run out of business by the industry.  
9 Okay, guys. These guys are the ones that lost  
10 us this amount of methionine. Don't buy feed  
11 from them, you know.

12 I understand that this was not a  
13 request you made. This was a request made on  
14 you, but I'll tell the industry right now and  
15 I'll tell this to the entire industry. When  
16 we're looking at things for pet foods, for  
17 aquaculture, for all the other things, if this  
18 is the kind of detail that's going to be  
19 required when we try and put a fence around  
20 the use of some of these substances, they're  
21 just not going to be allowed. Because I can  
22 bet the Board is just going to say if that's

1       what we're expected to do, we're just not  
2       going to put it on the list.

3                   MR. MCEVOY: Well, I would say  
4       that allowing it or not allowing it is one  
5       thing. When we put the annotation in with  
6       specific numbers, it's going to be more  
7       difficult for us to justify through the  
8       process.

9                   Any additional information that  
10      you can provide during your normal process of,  
11      you know, committee recommendations and public  
12      comment will help the process.

13                   If you don't provide it, it's  
14      okay. We'll do the best we can. Additional  
15      information would be helpful.

16                   MR. GIACOMINI: Jay.

17                   MR. FELDMAN: Thank you.

18                   First of all, thank you, Miles. I  
19      appreciate it and the Board appreciates the  
20      work that NOP's doing on this.

21                   Kevin, on your question and Miles,  
22      I'd like your input on this, I view the

1 statute as sunseting the material. So, in  
2 the absence of action by the Board, the  
3 material sunsets. There is no scientific  
4 justification required for sunseting. That  
5 would be a strict reading of the law.

6 So there would be no requirement  
7 on the NOSB to justify that action.

8 And to your point, Dan, I think we  
9 need to figure out a way to get transparency  
10 into the science and to the essentiality  
11 questions. If we can't do this, I think the  
12 trust issue in the strategic plan doesn't  
13 work. Consumer trust just goes down.

14 This is why, I think, the sunset  
15 discussion which we'll be having later in this  
16 meeting is so critical. It goes to the guts  
17 of what we do and the industry has to  
18 understand that this information has to be  
19 transparent.

20 MR. GIACOMINI: Jay, I agree with  
21 you on that. That's not the discussion we're  
22 going to be having. Okay?

1 MR. FELDMAN: Well, so, I guess  
2 from Miles --

3 MR. GIACOMINI: So, let's not get  
4 onto sunset right now. Okay?

5 MR. FELDMAN: Right. Okay.  
6 We're not getting on --

7 MR. GIACOMINI: Let's just stay  
8 with the response to the NOP report and the  
9 NOP response specifically.

10 MR. FELDMAN: Right. But, you're  
11 talking about the inability of this Board to  
12 generate data that the NOP is requesting of us  
13 and I'm suggesting we need to figure out a way  
14 to do that. I'm supporting -- as opposed to  
15 your position on this, Mr. Chairman, I am  
16 supporting the NOSB's requests for us. I  
17 think we can handle this, both in the  
18 transparency issue and on issues related to  
19 the science that supports our decision-making  
20 process.

21 You'll see a number of decisions  
22 coming up during this Board meeting which I



1 think is exquisite science discussion. I think  
2 that needs to be extended to all of our  
3 decisions. I think we can do it. We must do  
4 it. We have a statutory mandate to do it.

5 MR. GIACOMINI: Kevin.

6 MR. ENGELBERT: Yes, I appreciate  
7 those comments, Jay, but I tend to side with  
8 Dan on this. Because this methionine issue,  
9 it's not on our docket. It's not on our  
10 agenda and the history of it is well known.  
11 And in our recommendation in the spring, we  
12 vetted out very clearly, to me, why we took  
13 the position that we did.

14 The Committee would like to see it  
15 sunset plain and simple, but we just could not  
16 justify the immediate removal, and as is most  
17 decisions on the Board, that was our  
18 compromise position and I think we did the  
19 best we could. We could talk about this for  
20 the rest of the day, but basically, you know,  
21 I think we're done with it for now.

22 MR. GIACOMINI: Yes. Tracy, do

1 you have something? Okay.

2 A couple of other things, Miles,  
3 that I had. You talked about a stream of  
4 commerce on the last issue regarded to an  
5 action taken on something like corn steep  
6 liquor.

7 The response regarding our GMO  
8 vaccine recommendation seems to have continued  
9 to evolve to being more and more restrictive.  
10 Is there any consideration for a stream of  
11 commerce or are you saying that as of right  
12 now, today or whenever, absolutely no GMO  
13 vaccines are allowed and what is the  
14 consequence if an animal has received a GMO  
15 vaccine or would in the next couple of months  
16 because it's in somebody's inventory?

17 MR. MCEVOY: Good question. The  
18 rule certainly doesn't support the allowance  
19 of GMO vaccines. We understand that  
20 certifiers have not been evaluating whether or  
21 not vaccines are genetically modified or not.

22 I think part of the thing that

1 needs to be explored here is what is a GMO  
2 vaccine and what's not. I've heard  
3 conflicting information on that. Some people  
4 say GMO vaccines are very widespread.  
5 Conversations with APHIS have indicated that  
6 they're actually not very widespread. So we  
7 need to get more information here.

8 The regulation as it currently  
9 states does not allow the use of GMO vaccines.  
10 Certifiers aren't particularly looking at that  
11 aspect right now.

12 MR. GIACOMINI: Okay. I believe  
13 the program had made a comment about that at  
14 a previous meeting, but I don't remember the  
15 exact quote. So I won't try and hold it to  
16 you.

17 The other question I have is  
18 regarding implementation of the pasture  
19 program. It becomes fully implemented middle  
20 of June 2011. In some cases, that's going to  
21 be the middle of the pasture season. In other  
22 cases, that's almost the end of the pasture

1 season.

2 How much -- if they're, using  
3 simple terms, using the calendar year as their  
4 calendar, as their fiscal year for this, how  
5 much are the producers -- there's confusion as  
6 to how much, even for all the best efforts,  
7 how much they're going to be held for what  
8 occurs in the spring before that rule is  
9 officially in effect.

10 MR. MCEVOY: You're referring to -  
11 - the rule becomes effective in June of 2011.  
12 Fully. Actually, it is effective now. It  
13 becomes fully implemented in June 2011.

14 If a certifier finds after June of  
15 2011 that the 30 percent DMI is not being met,  
16 then a notice of noncompliance would be issued  
17 and if they could -- because that could  
18 potentially be a correctable violation and  
19 then if by the end of the grazing season they  
20 were above 30 percent, then they'd be fine.

21 It kind of depends on when the  
22 violation is determined. So if it's prior to,

1 I think, June 17th, and there's a violation,  
2 then the rule's not fully implemented for an  
3 existing certified operation. So you could  
4 identify that as this is something that needs  
5 to be addressed, but it wouldn't be a  
6 violation that would lead to an adverse  
7 action.

8 So it's going to have to be a  
9 case-by-case basis to see whether it's  
10 correctable or not and when the actual  
11 violation occurred. So it's going to be an  
12 interesting process.

13 MR. GIACOMINI: I'm no clearer on  
14 that than I was a minute ago, but that's fine.

15 Any further? Jay.

16 MR. FELDMAN: Miles, you know a  
17 lot of work has gone into a lot of these  
18 decisions that you're reporting to us on. I'm  
19 wondering if you can envision a process that  
20 would alert the Board to issues in a more  
21 timely way so that the Board doesn't waste its  
22 time on these critical issues.

1                   MR. MCEVOY: Yes, well, one of the  
2 things that we're doing there is having an NOP  
3 technical person on each of the committees to  
4 try to work more closely and collaborate more  
5 closely with the NOSB during the committee  
6 deliberations.

7                   The other thing is what we plan to  
8 do is get our responses to the -- to your  
9 decisions, your recommendations out of this  
10 meeting completed a lot earlier so that they  
11 happen early in the cycle rather than late in  
12 the cycle. So those are two things that we're  
13 working on.

14                  MR. GIACOMINI: Tina.

15                  MS. ELLOR: I just wanted to say  
16 that we've never before had this level of back  
17 and forth with the NOP and I just wanted to  
18 say for myself how much I appreciate it. It's  
19 getting better all the time. So, thank you.

20                  I won't address the sodium nitrate  
21 now because I think we haven't fully sent out  
22 our response to that, but, you know, once

1 again, we appreciate the back and forth.

2 MR. GIACOMINI: Steve.

3 MR. DeMURI: Miles, I commend what  
4 you're doing at the NOP. I think you guys are  
5 making great strides.

6 I have a question on lecithin. A  
7 year ago at this meeting, we made a  
8 recommendation and response to a petition to  
9 remove lecithin and that substance is  
10 scheduled to sunset in 2012. So, we needed to  
11 take some action on it if you're not going to  
12 make rulemaking on that recommendation.

13 Do you know what the status is on  
14 lecithin?

15 MR. MCEVOY: That's in clearance I  
16 believe.

17 MS. BAILEY: That's part of a  
18 proposed rule that's actually in departmental  
19 clearance right now. So, we'll have to look  
20 at the timing on that when the proposed rule  
21 actually comes out and the comment period and  
22 when we'll be able to get the final rule done

1 on that particular substance and how that's  
2 going to dovetail with the sunset 2012.

3 MR. DeMURI: Okay. We'll have to  
4 stay in contact on that.

5 MS. BAILEY: Sorry. Oh, Melissa  
6 Bailey, NOP, Standards.

7 MR. DeMURI: Thank you.

8 MR. GIACOMINI: Any further  
9 comments? Seeing none.

10 Just one final thing. One final  
11 touch on the finding. I would make the  
12 suggestion to the program to have someone  
13 contact, in case they haven't seen this and  
14 don't understand the situation, the Methionine  
15 Task Force and let them know the status of  
16 that. Without knowing what the Livestock  
17 Committee will do before the next meeting, but  
18 they could be looking at another deadline  
19 which could require another petition rather  
20 than this being transferred over into a sunset  
21 process.

22 So, I would suggest the program to



1 make that contact to let them know where  
2 they're going to potentially stand.

3 MR. MCEVOY: Good idea. We will  
4 take you up on that.

5 MR. GIACOMINI: Nothing further,  
6 thank you, Miles, for the presentation from  
7 the program and next up organic coordinator  
8 from USDA Mr. Mark Lipson.

9 MR. MCEVOY: Okay. I think I  
10 already introduced Mark, but we're really  
11 happy to have Mark here. So.

12 MR. LIPSON: Good morning. Thank  
13 you. Thank you all very much.

14 I guess I'll speak through this  
15 since it's time for the scheduled break almost  
16 and I do want to leave a little time for  
17 questions. Okay. There we go.

18 USDA, every way, every day is one  
19 of the Secretary's phrases that he likes to  
20 use and it is appropriate to my talk about the  
21 integration of organic within the Department.

22 Organic does continue to grow its

1 footprint and presence and legitimacy within  
2 USDA. There are, of course, still very many  
3 challenges both cultural and ideological  
4 perhaps and level of knowledge within the  
5 Department is still a big problem.

6 I will say that external  
7 contention around organic certainly does  
8 affect this trajectory of its further  
9 penetration and efficacy within all parts of  
10 the Department. That includes both the  
11 discussion that we have within the organic  
12 community and the discussion about organic in  
13 the wider world with the rest of the  
14 agriculture universe. So, just to mention  
15 that it does have an effect.

16 And this is the point I really  
17 want to drive home. Is that the efficacy of  
18 NOP and trust in the USDA organic seal is  
19 essential for everything else that happens  
20 with organic in the Department. Everything  
21 else does rest on this process, this program  
22 working well.

1                   So, I'm going to whip through a  
2                   few things related to the overall scope of  
3                   things in the Department for organic. The  
4                   2008 Farm Bill is very significant. I'll talk  
5                   about the implementation of those programs.  
6                   Talk a little bit about my position as the  
7                   Organic and Sustainable Agriculture Policy  
8                   Advisor for the Office of the Secretary, some  
9                   of the interagency projects that we're working  
10                  on, the Department-wide organic working group  
11                  and then this final sleeper, very important,  
12                  the objective spore growth of certified  
13                  organic operations that are now in the USDA's  
14                  strategic plan.

15                  So, to start with in terms of Farm  
16                  Bill implementation, these are the four major  
17                  areas, research, extension and data  
18                  initiatives, certification, cost-share which  
19                  Miles already talked about. So, just skip  
20                  through that pretty fast. Conservation  
21                  programs and crop insurance.

22                  In terms of organic research and

1 extension, I'm not going to read all this, but  
2 to say that there is a lot happening. Besides  
3 the NOP, that's the most advanced area of USDA  
4 in terms of the longevity of organic activity  
5 and how much money it has to work with.

6 So, we're still on an upward trend  
7 with that. Getting beyond the dedicated  
8 organic stuff to have organic research and  
9 extension issues affect the wider USDA organic  
10 research and extension portfolio is definitely  
11 something I hope to continue working on and we  
12 are going to be holding pretty big three-day  
13 organic research systems symposium in  
14 Washington in March. We'll hear more about  
15 that.

16 Organic data initiatives, of  
17 course, there's 5 million in mandatory money  
18 in the Farm Bill. That has enabled Economic  
19 Research Service, Cathy Greene and Carolyn  
20 Dimitri and Lydia Oberholtzer, to continue the  
21 series of work that they've been doing for  
22 many years now.

1                   The NASS Organic Production Survey  
2           in 2008 is a very landmark piece of work. I  
3           don't know how many people have really taken  
4           the time yet to drill down into that, but that  
5           is the definitive statistical baseline about  
6           the organic sector now.

7                   It had about 85 percent return  
8           rate. So, it is, you know, fundamentally  
9           important as the statistical profile of the  
10          organic production sector and I will just  
11          mention that you can make a request to NASS.  
12          That's the National Agricultural Statistics  
13          Service. You can make a request to them for  
14          cross tabs or filters on the data. It's  
15          really a massive amount of data and it  
16          deserves as much attention as you all can give  
17          it in terms of querying it further. So, they  
18          will run those cross tabs and produce a result  
19          for you.

20                   And I also mention the ongoing  
21          expansion of the AMS market news service price  
22          collection series. That's constantly

1 expanding into new areas and the organic price  
2 portal is actually a very effective tool if  
3 tracking that stuff matters to you and I hope  
4 it does.

5           There's a snapshot of the fruit  
6 and vegetable header, you know, from last  
7 week. You know, so, it goes into great detail  
8 about prices reported at the terminal markets.  
9 And RMA is funding more work, that is the Risk  
10 Management Agency is funding more work by AMS  
11 to continue expanding this in order to support  
12 the crop insurance and disaster program  
13 improvements. Talk about it in a second.

14           Certification cost-share, Miles  
15 already went over this, but I will emphasize  
16 that less than half of the money allocated by  
17 Congress for the National Program has been  
18 used. So, the outreach and use of that  
19 program by producers and handlers is very  
20 important. We want that money to continue to  
21 be available. This is the only direct  
22 support, financial support, that is available

1 to every producer and handler in the organic  
2 sector from the Federal Government. So, it  
3 behooves us to do everything we can to make  
4 sure that money gets used very effectively and  
5 fully in the next couple of years.

6 The EQIP Organic Initiatives,  
7 that's the Environmental Quality Incentives  
8 Program within the Natural Resources  
9 Conservation Service. This was sort of known  
10 as the transition provision in the Farm Bill,  
11 but it does apply both to transitional  
12 producers and existing organic producers.  
13 Provides financial and technical assistance  
14 related to the implementation of conservation  
15 practices in an organic system.

16 Here again, NRCS at the discretion  
17 of Chief Dave White allocated 50 million, out  
18 of EQIP's budget of over a billion dollars per  
19 year, allocated 50 million for this organic  
20 initiative in both 2009 and 2010. So, 100  
21 million total. There's never been that kind  
22 of money on the table to support organic

1 agriculture.

2           Only 63 million of it ended up  
3 being put into NRCS contracts and now there  
4 are very significant challenges in terms of  
5 NRCS' implementation of it, NRCS'  
6 understanding at a field level about organic  
7 systems, but nonetheless, there's also, you  
8 know, more effort needed to make sure  
9 producers know about this, get the help  
10 getting to it.

11           It's not user friendly. I think  
12 it's fair to say that without being derogatory  
13 to the agency, but nevertheless, it's just  
14 crucial that we use those resources that are  
15 being put on the table for organics. What we  
16 were asking for for years and now, it's there.

17           So, upgrading the organic  
18 performance of NRCS is one of the things that  
19 I, you know, am hoping to focus on in my job,  
20 but here are several things underway already.  
21 There are internal NRCS training initiatives  
22 that will be happening in FY 2011.



1           There's a conservation innovations  
2 grant that's been made to National Center for  
3 Appropriate Technology's ATTRA Program with  
4 many partners. Many of you working on this  
5 are here in this room. This will be directed  
6 at revising the NRCS practice standards to be  
7 more appropriate for organic systems.

8           Also mentioned, there's going to  
9 be a new Deputy Chief of NRCS for its Science  
10 and Technology Division who's Dr. William  
11 Hunnicutt who has done organic research  
12 through the Agricultural Research Service in  
13 Orono, Maine for many years. So, I expect  
14 that to be a very significant new presence  
15 within the USDA helping make this all work  
16 better for organic producers.

17           And Miles and I are working to try  
18 and clear up the ability of organic inspectors  
19 to also function as technical service  
20 providers for NRCS' Technical Service Provider  
21 System. Now, there's been some contradictory  
22 statements about that in the past and we're

1       trying to get that cleared up. Hopefully,  
2       that will happen soon.

3               Crop insurance. As many of you  
4       know, the Farm Bill-mandated studies by the  
5       Risk Management Agency and the Federal Crop  
6       Insurance Corporation studying the inequities  
7       for organic crop insurance, the 5 percent  
8       organic premium surcharge and the inability to  
9       pay out organic prices when there is a claim.

10              Those reports were contracted,  
11       conducted and completed earlier this year.  
12       Five percent surcharge, as of August, was  
13       removed on about a dozen crops where the data  
14       was really unequivocal and readily available  
15       and organic price elections are now in place  
16       for the 2011 crop year on four major field  
17       crop packages: corn, soybeans, cotton and  
18       processing tomatoes.

19              Now, these are all just the  
20       initial results of this effort where the data  
21       was very strong. RMA has had problems in the  
22       past. That's the Risk Management Agency which

1 manages the crop insurance programs. RMA has  
2 had problems in the past with moving too  
3 quickly on things where they didn't really  
4 have adequate data and had to pull products  
5 back and that's caused a lot of problems.

6 So, there is a very strong  
7 commitment to continuing this trajectory for  
8 the organic sector, but it's going to move  
9 cautiously. But, RMA is funding more data  
10 collection and analysis in order to do that.

11 So, just a little bit about my  
12 position as an Organic and Sustainable  
13 Agriculture Policy Advisor to the Office of  
14 the Secretary. The position is authorized for  
15 two years with the option to renew it for four  
16 more years. So, basically, for this term and  
17 hopefully the next one.

18 My direct report is the Under  
19 Secretary for Marketing and Regulatory  
20 Programs, Ed Avalos. I do spend a lot of time  
21 on detail with Deputy Secretary Merrigan and  
22 also, you know, I do work with other -- really

1 all the mission areas of the department when  
2 organic comes across their screen. They're  
3 starting to find out that I'm there and can  
4 help either explain something to them or move  
5 something through a process and I coordinate  
6 the USDA Organic Working Group which I'll talk  
7 about in a second.

8           So, basically, hopefully, my  
9 position will be a default first stop for the  
10 public when there's a non-enforcement or non-  
11 regulatory organic question. We hope to be  
12 able to provide lots of information about  
13 where all the pieces of the USDA are for  
14 organics so that people don't have to use me  
15 as that default, but that's how that position  
16 will function.

17           And then for agencies, I'll be  
18 trying to provide the cross agency  
19 coordination, interdepartmental  
20 troubleshooting and trying to get things  
21 through clearance. You hear that phrase a lot  
22 and it's a problem. You know, it's a task.

1                   Then I also do serve on the Know  
2                   Your Farm and Know Your Food Task Force with  
3                   the Deputy and her management team which again  
4                   deals with things across the entire spectrum  
5                   of USDA programs.

6                   A couple of quick mentions about  
7                   interagency projects that I've worked on since  
8                   I've been there. Miles mentioned the  
9                   International Trade Codes Package. That's  
10                  something that had been stalled out for a  
11                  number of years, but identified by very many  
12                  people as important because we do not have any  
13                  reliable statistical data about international  
14                  organic trade, about volumes and specific  
15                  products. So, we put together a new package  
16                  right after I arrived. Involved coordinating  
17                  a number of agencies.

18                  Submitted a package to the U.S.  
19                  International Trade Commission. On October  
20                  15th, they approved that request. So, these  
21                  new specialized organic trade codes within the  
22                  harmonized trade system will appear in the US

1 ITC manual on January 1 and will be used  
2 thereafter.

3 Also relating to international  
4 trade, we've been working on a cooperation  
5 agreement's document that details the  
6 reciprocal activity between AMS, NOP and the  
7 Foreign Agricultural Service. So, there are  
8 actually a number of areas where that  
9 cooperation is happening. So, we're trying to  
10 document that and strengthen it and that'll be  
11 hopefully completed very soon.

12 The Organic Working Group, this is  
13 our statement of purpose and interagency  
14 coordination and communication body. It's  
15 informal, but it is as the Deputy informed our  
16 meeting a couple of weeks ago, above the  
17 radar, out of the closet. The Secretary knows  
18 about it. It's not covert. So, we had a  
19 great meeting a couple of weeks ago with a  
20 very large turnout from all across the  
21 Department and that's going to continue to  
22 evolve.

1                   My goal is to intensify the work  
2                   of that working group and produce some very  
3                   specific outcomes.

4                   Here is some of the things that  
5                   we're talking about making happen based on  
6                   organic program information on the web for the  
7                   public covering all USDA agencies. I hope to  
8                   get that out in December. So, that will be  
9                   just a one-stop shop information-wise where  
10                  all the organic portfolios are in the USDA and  
11                  you don't have to burrow through all those  
12                  obscure USDA webpages to find that.

13                  Hopefully earlier than that, we'll  
14                  just be doing a directory of agency contacts.  
15                  That's pretty ready once my next few weeks of  
16                  travel are over.

17                  And then, you know, keep building  
18                  that into an interactive web coil for all  
19                  things organic within the Department.

20                  This issue of training and  
21                  education for USDA, personnel is high on my  
22                  list because as I said, that is just a very,

1 very important obstacle. There are still a  
2 lot of people in the USDA who do not know that  
3 there's a USDA Organic Seal. They don't know  
4 that there's a regulatory program and national  
5 standards. So, you know, it's not a high bar  
6 yet, but we can make a lot of progress on that  
7 very quickly.

8           And the other thing the Organic  
9 Working Group will focus on is sheer outreach  
10 to customers and stakeholders. That is, NOP  
11 will be able to put out information about crop  
12 insurance and the EQIP initiative and those  
13 agencies will be able to put out information  
14 about NOP issues. So that we'll harness all  
15 of these different outreach capacities and all  
16 these different agencies to get the word out  
17 to the organic sector and it's customer and  
18 stakeholders for all the programs that are  
19 proliferating now.

20           So, the USDA Strategic Plan. Just  
21 before I arrived, the Secretary issued a new  
22 strategic plan for USDA and right in there in



1 black and white, in print approved by the  
2 Secretary, performance objective 1.3.1 is  
3 create an increase in the number of certified  
4 organic operations, that includes both  
5 producers and handlers, by 25 percent from the  
6 number measured in 2009 to 2015.

7 So, for the first time, there is  
8 an objective goal endorsed by the Secretary of  
9 Agriculture to move the size of the organic  
10 sector forward.

11 This is within the rural  
12 development. You know, economic prosperity  
13 for rural America part of the strategic plan,  
14 but it does apply across the Board. This  
15 justifies the work of everybody in the Organic  
16 Working Group to be able to work on organic in  
17 their domain.

18 So, the important thing I want to  
19 mention about this is that the implication is  
20 not just new producers and handlers to  
21 organic, but also retaining existing ones. It  
22 means enabling the success of organic

1 operations that we have now not just  
2 recruiting new ones. Because as we know,  
3 there's people who come in and go out for  
4 various reasons, but this mandate to me means  
5 focusing resources on making things work  
6 better for the existing producers and handlers  
7 we have as well as recruiting new ones.

8 So, these are all the areas that  
9 I've listed here because just that's what  
10 would fit on the page -- fit on the slide, but  
11 the intent is to use the Organic Working Group  
12 and my position to make all these things focus  
13 on that objective.

14 So, moving onward, as I mentioned,  
15 we're going to have this Organic Systems  
16 Research Conference March 16 through 18 and I  
17 guess we have this traditional St. Patrick's  
18 Day thing for organic meetings in D.C. I  
19 don't really know why, but I guess it's  
20 because it's green.

21 Analysis and ideas for the 2012  
22 Farm Bill, I'll just put that on the table.

1 Part of my job is to collect stakeholder input  
2 and ideas about the 2012 Farm Bill. Of  
3 course, as you know, USDA doesn't write the  
4 Farm Bill, but when Congress asks USDA for  
5 ideas or feedback on things, then we have to  
6 be prepared to do that.

7 The Organic Working Group will be  
8 holding more general stakeholder input  
9 sessions probably with the Federal Register  
10 notice. I'm not totally clear on how that's  
11 going to work yet. To just make it a little  
12 more formal than it has been in the past, but  
13 hopefully that will take a little bit of  
14 pressure off of this Board to be the receiver  
15 of the whole spectrum of issues for organic.

16 That's really the point of my  
17 position. Is that that doesn't have to be the  
18 case any more. There's somewhere else where  
19 the non-regulatory non-enforcement questions  
20 and concerns and demands about organic can go  
21 to enable this Board to focus more on its job.

22 And finally, outreach to other

1 Federal Departments. Hopefully, we'll also be  
2 part of the -- what we'll be doing going  
3 forward. There is important crossovers with  
4 FDA and EPA and Department of Commerce. NOAA  
5 would be nice and that kind of stuff. So,  
6 we'll see.

7 So, just to tie it up, the  
8 momentum of all of the stuff that I've talked  
9 about for organic elsewhere within the  
10 Department just rests on the success of NOP  
11 and respect for the organic seal. We are in  
12 this very intensive period of NOP program  
13 improvement and remedial constructs to improve  
14 the integrity and coherence of the program.

15 I don't think we're through the  
16 eye of the needle. It's going to get more  
17 complicated before it gets simpler, but  
18 recognizing that we are in that phase. This  
19 emphasizes that the success of NOP and the  
20 integrity of the seal. This period of upgrade  
21 requires a very high level of performance,  
22 continued very high level of performance from

1 the NOSB.

2 Thank you for your service. I say  
3 that, you know, as an observer for many, many  
4 years and on behalf of the Secretary and the  
5 Deputy Secretary to you all and former NOSB  
6 members as well.

7 Here's my contact info. Hopefully  
8 you'll use it wisely, but when needed.

9 MR. GIACOMINI: Use it wisely.  
10 Use it often.

11 Questions or comments? Kevin.

12 MR. ENGELBERT: Thank you, Mark.  
13 I appreciate that report. Two things that  
14 peak my interest I wish you could elaborate on  
15 I wish you could elaborate on.

16 The first is early in your  
17 presentation you talked about external  
18 contention impacting the organic program.  
19 Could you give an example of that and, you  
20 know, what exactly is causing problems or what  
21 external contention is?

22 And, two, you talked about

1 terminal market prices where you're tracking  
2 the prices of organic commodities. Could you  
3 give an example of what one of those would be  
4 and whether or not you differentiate between  
5 domestically -- U.S. produced product and an  
6 imported product?

7 MR. LIPSON: Well, on the first  
8 question, you know, I guess left it very broad  
9 because there's a lot of different effects it  
10 has, but the examples I'm talking about are,  
11 you know, both the high profile debates that  
12 we have within the organic community and the  
13 commentary about organic and its role in  
14 American agriculture that comes from outside  
15 our community.

16 I don't really have a finer point  
17 to put on it because the effects are various.  
18 You know, the debates about organic in the  
19 wider world of agriculture policy do, you  
20 know, keep the attention up, but there's a lot  
21 of myths that get repeated.

22 I think it's fair to say that as

1 the organic sector has grown, the need on the  
2 part of some to critique it has also grown and  
3 I just wanted to say that that's noticed, that  
4 that's something that we need to take into  
5 account in terms of continuing the progress  
6 that we're -- and, you know, the internal  
7 debates, the quality of those matters. That  
8 gets notice.

9 It's a question of how that's  
10 conducted. You know, not that that should go  
11 away. Absolutely not. I think the organic  
12 community's setting a great example for  
13 stakeholder input and involvement and keeping  
14 that at a high level is very important.

15 And on the price reporting, it may  
16 include imported product when it goes through  
17 a terminal market. I don't know the exact  
18 answer to that question.

19 Terry Long in the Market News  
20 Service Branch of AMS is the lead person for  
21 that and if somebody can make a note for me,  
22 I'll follow up on that.

1 MR. GIACOMINI: Further questions  
2 or comments? Do not. Thank you. Great  
3 presentation. Miles.

4 MR. MCEVOY: Yes, I could just  
5 clarify on the price reporting and it doesn't  
6 distinguish between domestic and foreign.  
7 It's just the organic price of a given  
8 commodity. So, it could include foreign  
9 product, but it doesn't -- the price is the  
10 same.

11 MR. LIPSON: Yes, it wouldn't --  
12 the reports don't specify where a product came  
13 from. They report a range of prices observed  
14 at a given market for a given product on a  
15 given day.

16 MR. GIACOMINI: Okay. Thank you.  
17 We're ready for a break. I just want to bring  
18 everybody's attention. We're two and a half  
19 hours into the meeting and we're a half an  
20 hour behind schedule.

21 So, a 15-minute break. Let's try  
22 very promptly to be back at 35 -- 20 until,



1 10:40.

2 (Whereupon, the above-entitled  
3 matter went off the record at 10:24 a.m. and  
4 resumed at 10:42 a.m.)

5 MR. GIACOMINI: The Board Members  
6 will please take their seats and please take  
7 any conversations, continuing conversations  
8 from the gallery outside please.

9 The meeting is back in session.  
10 Please take any conversations outside, back  
11 out into the hallway at least.

12 We are at the point in time where  
13 we begin public comment. I want to remind  
14 everyone that this Board and this Chairperson  
15 will not tolerate any personal attacks or  
16 disparaging remarks directed to individuals in  
17 the audience or to any specific Board Members.  
18 We expect everyone to treat each other with  
19 respect and dignity and any behavior other  
20 than that will not be tolerated.

21 We will also work off the  
22 schedule. This side of the room is podium

1 one. This side of the room is podium two. If  
2 you're confused, it's whatever side of the  
3 sheet of paper you're looking at.

4 John.

5 MR. FOSTER: Do we have a video?  
6 I'm not familiar with the video cameras of  
7 these proceedings. Can we find out what  
8 that's about?

9 MR. GIACOMINI: We will. We'll  
10 work through the beginning stuff here first  
11 and then we'll see where we stand. Okay.

12 We will be working off of this  
13 list. We'll announce the names. The person  
14 next up. The person on deck. The person in  
15 the hole, to use baseball terms.

16 I apologize for any butchering and  
17 slaughtering that I do of any last names.  
18 Believe me with a name like Giacomini, it's  
19 something I'm very familiar with and I  
20 apologize for whatever I do to it. It's not  
21 intentional.

22 Also, I would like to announce

1 that the Board decided to make a slight change  
2 in the process of public comment at this  
3 meeting. I believe most of you have been made  
4 aware of this as you signed up, but the Board  
5 felt that it was very important that everyone  
6 be held to the same level of fairness for lack  
7 of a better term. We are signed up and  
8 assigned to give five minutes of public  
9 comment.

10 We do allow proxies, but the use  
11 of the proxy to just allow someone to have ten  
12 minutes of thought, continuing thought, rather  
13 than being held to five as everyone else is,  
14 we do not feel was fair.

15 If someone is going to come up  
16 with a proxy and do point one, two and three  
17 and then come back with -- make their own  
18 presentation with point one, two and three and  
19 then come back with their proxy and do four,  
20 five and six, that is certainly their right,  
21 but we're holding each person as their  
22 speaking to their five-minute allotment. You

1 will be allowed one proxy, but there will be  
2 at least one person between you and your proxy  
3 presentation.

4 So, again, podium one, podium two.  
5 I see we're already ready and if the next  
6 people up will also get ready. We have the  
7 signs. We have five minutes. We have a one-  
8 minute warning and stop and you will hear your  
9 buzzer. Hopefully, it would be loud enough.

10 And I would remind all of the  
11 Board Members to please be as concise as  
12 possible with your questions and be aware of  
13 the fact that we want to be as concise and  
14 considerate to the last and paced out so that  
15 we can do that for the last people presenting  
16 as we are for the first.

17 Lisa, could you give us an update  
18 on the video or do we have someone else from  
19 the program to -- yes.

20 MS. MILLER: I'm Greta Miller.  
21 We're independent film makers. We made a film  
22 about organics in Wisconsin in 2004 and '05

1 called Back to the Land Again and we're just  
2 here to see what's going on this year that  
3 you're meeting in Madison.

4 MR. GIACOMINI: Okay. Thank you.  
5 Did you get that adequately for the  
6 transcript? Okay. Good.

7 Okay. So, they're ready. If  
8 everyone else is ready to go, all the Board  
9 Members are in place. We're not used to this  
10 either, but so, we're going back and forth on  
11 the two podiums. But, we'll get ready.

12 Randy.

13 MR. ROMANSKI: Right. Thank you.

14 Good morning. My name is Randy  
15 Romanski and I am the Secretary of the  
16 Wisconsin Department of Agriculture Trade and  
17 Consumer Protection. Welcome to Wisconsin.

18 All right. I'll try and speak a  
19 little louder then.

20 We're proud of the role  
21 Wisconsin's played in the growth of organics  
22 nationwide and of the role the Department of

1       Agriculture Trade and Consumer Protection has  
2       played in that growth.

3                 Our agriculture development  
4       diversification program provides funding to  
5       foster a diverse agricultural economy in the  
6       state.

7                 In 1989, we gave \$20,850 in grant  
8       money to a group of farmers who wanted to  
9       start a cooperative to sell organic  
10      vegetables. From those humble beginnings  
11      Organic Valley Family of Farms has grown into  
12      the largest farmer cooperative in the nation.

13                Along with Organic Valley,  
14      Wisconsin boasts the largest organic farming  
15      conference in the country sponsored by the  
16      Mid-West Organic and Sustainable Education  
17      Service, MOSES, along with the Mid-West  
18      Organic Services Association, MOSA. These  
19      organizations were here in the early days of  
20      organics and have all contributed  
21      substantially to its growth in our state.

22                We are proud to partner with them

1 and the organic farmers and the businesses of  
2 the State of Wisconsin.

3 Today, Wisconsin's a prominent  
4 player in the national organic stage with the  
5 second largest number of organic farmers after  
6 California. We're first in organic dairy  
7 farms and in the top five in numbers of  
8 organic livestock and poultry farms, vegetable  
9 farms and field and crop production.

10 We've seen the number of organic  
11 business grow by 70 percent since 2005 with  
12 many processors branching out into organic  
13 products and many new companies starting up or  
14 moving into our state. This is a reflection  
15 of the support and infrastructure we provide  
16 to the organic sector.

17 We feel that organics have an  
18 important role to play in a strong diversified  
19 agricultural economy for Wisconsin. Our  
20 agricultural sector accounts for \$59 billion  
21 in economic activity annually for our state.  
22 Our diverse agricultural economy includes

1 everything from dairy to cranberries and  
2 potatoes to ginseng and we have organic  
3 producers in all of those products. That  
4 diversity provides stability for our  
5 agricultural economy.

6 That's why our agency supports  
7 organic agriculture. That is why we hosted an  
8 organic summit in 2004 that brought together  
9 leaders in the organic sector with agency and  
10 university representatives to ask the  
11 question: how can we help grow this industry?

12 Our answer was creation of an  
13 organic task force in 2005 to identify the  
14 needs and issues. In 2006, the organic task  
15 force report identified four actions the state  
16 should take to move organics forward here.

17 We've accomplished all four of  
18 them with the creation of organic specialist  
19 positions at the Department of Ag Trade and  
20 Consumer Protection and the University of  
21 Wisconsin College of Agriculture and Life  
22 Sciences, in the establishment of a permanent



1 private sector organic advisory council and an  
2 interagency team made up of state and Federal  
3 agency representatives.

4 These groups work together to  
5 carry out our organic goals.

6 Here in Wisconsin, we have a long-  
7 standing interest in promoting and supporting  
8 organics. Our Agricultural Development and  
9 Diversification Program has averaged one or  
10 more grants to support organics averaging  
11 \$27,000 per year totaling over \$550,000 over  
12 the 20 years of the program.

13 Through our value-added dairy  
14 initiative, we have invested \$200,000 in  
15 organic dairy farms and processors over the  
16 six years of that program.

17 Our Organic Specialist Laura Payne  
18 and the Organic Advisory Council are part of  
19 our investment in organic agriculture. Their  
20 work has helped focus attention on the needs  
21 of the organic sector.

22 As a result, we've been able to

1 provide strategic resources to support  
2 infrastructure development that helps with  
3 processing and distribution of the high  
4 quality products raised by our Wisconsin  
5 organic farmers.

6 We looking forward to continuing  
7 partnerships with the organic community and  
8 with the Board's permission, I'd like to  
9 introduce to you one of those partners.

10 Christine Mason, Farm Manager for Standard  
11 Process, Incorporated is Secretary of our  
12 Organic Advisory Council and she will be  
13 speaking next.

14 But, I'd just like to close by  
15 once again saying thank you for being here.  
16 Welcome to Wisconsin and most importantly,  
17 thank you for all that you do.

18 MR. GIACOMINI: Thank you. Any  
19 questions? Any questions or comments for  
20 Randy before we move on to Christine?

21 Okay. Next on deck on this one is  
22 Mark Kastel. Christine -- that's all right.

1 You'll get it down. It's a long day.

2 MS. MASON: Good morning. As  
3 Randy said, I am the Secretary of the  
4 Wisconsin Organic Advisory Council. We are a  
5 standing committee of the Wisconsin Department  
6 of Ag Trade and Consumer Protection. The OAC  
7 is formed by stakeholders from all facets of  
8 the organic community including various state  
9 and Federal agencies within Wisconsin.

10 Our mission is to bring together  
11 public and private resources to promote  
12 Wisconsin's national leadership position in  
13 organic agriculture as well as to advise the  
14 Wisconsin Department of Agriculture on  
15 pertinent organic issues.

16 The council supports organic  
17 production, processing and purchasing  
18 opportunities for Wisconsin's organic farmers,  
19 processors and consumers.

20 The partnership between the  
21 Wisconsin Organic Advisory Council and the  
22 Government interagency team has helped to

1 build alliances and enhance the climate for  
2 the growth of organics in this state.

3 Protection and promotion of  
4 organic integrity is the basis for most of the  
5 work that we do and I would like to share with  
6 you our thoughts on several of the issues  
7 currently facing Wisconsin's organic  
8 community.

9 First, we strongly support the  
10 establishment of credible and verifiable  
11 animal welfare standards. Wisconsin is a  
12 national leader in organic dairy and livestock  
13 production and we feel that animal welfare  
14 standards are critically essential to the  
15 integrity of these sectors.

16 Currently, there are a variety of  
17 humane labels that are competing with the  
18 organic label in the marketplace. Ambiguity  
19 within the organic standard with regards to  
20 animal welfare may well influence some  
21 consumers to make a choice between an organic  
22 label and a humane label.

1                   To cement consumer confidence, the  
2                   organic label should represent the highest  
3                   standard in animal husbandry and fulfill the  
4                   spirit of the law which mandates natural  
5                   behavior and other humane practices.

6                   Practical common sense standards are critical  
7                   to the continued growth of and consumer  
8                   confidence in organic livestock products.

9                   Strong animal welfare standards will  
10                  strengthen the organic label and reduce  
11                  consumer confusion about humane labels in the  
12                  marketplace.

13                  Secondly, we would like to thank  
14                  the NOP for the release of the pasture  
15                  standard and encourage them to oversee the  
16                  credible and consistent implementation of this  
17                  regulation for all ruminant livestock products  
18                  that carry the USDA organic seal.

19                  As a leader in the organic dairy  
20                  and livestock sectors as well as in pasture-  
21                  based systems, we in Wisconsin applaud the NOP  
22                  for establishing a standard that insure that

1 pasture is a substantial component of a  
2 ruminant's diet under the organic standard.

3 We have not heard if the beef  
4 finishing section of the regulation will be  
5 modified or if it will stand as written based  
6 on the public comment period last February.  
7 We would like to hear from the NOP in regards  
8 to the beef finishing standards and also, we  
9 would like to know if the origin of livestock  
10 regulation is near to completion.

11 Thirdly, we'd like to thank the  
12 NOP for working to improve the organic  
13 certification cost-share program. The program  
14 is very popular among Wisconsin farmers and  
15 processors and we appreciate the additional  
16 funds the NOP has provided to a lot more of  
17 our farmers to receive this benefit.

18 We encourage the national program  
19 to provide more tools and funding to help us  
20 reach out to those not currently utilizing the  
21 program. We feel that the cost-share program  
22 could be an effective tool for bringing

1 onboard producers who are currently not  
2 certified and view the costs associated with  
3 certification as a barrier.

4 Many producers use the work  
5 organic when selling their products, but they  
6 may or may not meet the organic regulations.  
7 Some of these farmers truly meet the exempt  
8 status while others do not. Bringing these  
9 producers into the organic certification  
10 community will strengthen consumer confidence  
11 in the organic label.

12 The dollars given to the states to  
13 administer the program are currently not  
14 sufficient to do this further outreach and  
15 typically only currently certified organic  
16 producers are directly informed about the  
17 program.

18 Lastly, we strongly support the  
19 removal of hops from 606. Thank you to the  
20 Crops Committee for listening to the organic  
21 hops growers in recommending removal.

22 Wisconsin is the home of many fine

1        breweries some of which produce organic beer.  
2        We also have a burgeoning organic hops growing  
3        sector. The removal of hops from 606 will  
4        help to expand markets for contracting and  
5        growing of organic hops.

6                    So, in conclusion, thanks for  
7        coming to Wisconsin for this meeting. We are  
8        proud to host the National Organic Standards  
9        Board. We hope you enjoy our beautiful state  
10       and that you have a chance to meet some of the  
11       many dynamic organic producers who have made  
12       Wisconsin a leader in organic agriculture.

13                   MR. GIACOMINI: Thank you. Any  
14       questions or comments? Seeing none. Thank  
15       you.

16                   Next up on podium two is Charlotte  
17       from Cornucopia. Meghann Quinn on deck for  
18       number one.

19                   Mark.

20                   MR. KASTEL: We're trying to get  
21       our technology down here, folks. Go back to  
22       the beginning for me, Lisa. Will you? Thank



1       you.

2                   Hello. Welcome to Wisconsin. I'm  
3 not the only one saying that today.

4                   My name's Mark Kastel. I am the  
5 Senior Farm Policy Analyst for the Cornucopia  
6 Institute. We're based on Cornucopia,  
7 Wisconsin. We're a farm policy research group  
8 that supports family scale farmers and acts as  
9 an organic industry watchdog.

10                  Today, we're formally presenting  
11 to you our most recent research report  
12 separating factory egg production from  
13 authentic organic agriculture entitled  
14 Scrambled Eggs. You should have all received  
15 a copy of this on the Board.

16                  Why? Why did we spend the last  
17 two years looking at farms around the country?  
18 Well, we heard reports of widespread abuses in  
19 organic agriculture, quote organic. Large  
20 containment operations with absolutely no  
21 access to the outdoors for birds either  
22 because, and I wish I was making this up, they

1       have a note from a veterinarian saying it  
2       would be dangerous for the birds to be outside  
3       and in those operations, the -- can you dim  
4       the lights, too? Is that possible? Thank  
5       you.

6                       In those operations, we had birds  
7       basically in confinement. Very similar  
8       models. This is an aviary system. This  
9       particular henhouse has 35,000 birds. This  
10      particular barn had access to outdoors. There  
11      was about 1 percent of their birds outside the  
12      day I visited, but in terms of the stocking  
13      density, very typical of conventional  
14      agriculture.

15                      So, in response, we visited many  
16      facilities around the country. Many of these  
17      were two-story buildings. Some had 80,000  
18      birds in one barn. We conducted hundreds of  
19      interviews, unannounced farm visits, surveyed  
20      all egg producers in the United States and so,  
21      we came up with some commonality.

22                      It's a little hard to see this,

1 but so, one scenario, we had the folks that  
2 didn't have any access to outdoors, but they  
3 had a nice note.

4 We have a little porch on the end  
5 of this facility and what's characteristic of  
6 -- we've heard of pass-through poultry, of  
7 porch poultry. Is that you've got a large  
8 fixed barn with anywhere from let's say 5,000  
9 to 30,000 maybe 80,000 birds and then maybe  
10 you have a porch with 3 percent of the square  
11 footage of the footprint of the building.

12 So, even if the Board here agreed  
13 that a porch with a wood floor, a small porch  
14 with a wood floor or a porch with a concrete  
15 floor and a roof constituted, quote, the  
16 outdoors and we certainly don't agree with  
17 that premise. If only 3 to 5 percent of the  
18 birds have access to that, quote, outdoors,  
19 that means that 95 percent of those birds have  
20 no access to the outdoors.

21 This is unfair to legitimate  
22 ethical family farmers. So, it's certainly

1 grossly unfair to consumers who think they're  
2 supporting a different kind of ethic where the  
3 birds have more space inside than typical  
4 conventional facilities. They're treated with  
5 more respect.

6 In Europe, they require 40 square  
7 feet which might be indicative of this farm in  
8 Wisconsin and what we found a lot was plenty  
9 of space. This is a 15,000 bird facility in  
10 Illinois. All the birds were inside. Plenty  
11 of space. Lots of houses. Overgrown with  
12 weeds. No birds have been out. Lot of houses  
13 with one door on the end for 20,000 birds.  
14 This had about 500 birds out out of 20,000.  
15 Right. Down at the end there's one door. So,  
16 those are the birds out. Again, about a  
17 15,000 bird facility in Indiana.

18 It's hard to see this, but the  
19 grass on both sides of this fence is exactly  
20 the same. It's been mowed. There's been no  
21 birds out.

22 We've got buildings with 15,000

1 birds with doors a foot and a half by a foot  
2 and a half wide. Fifteen thousand birds.  
3 Birds with access to rubble, gravel. This is  
4 a feedlot.

5 I'm going to end. This sentence.

6 The pullets don't go outside.

7 This is a pullet facility in Wisconsin where  
8 the birds have total confinement.

9 But, folks, there's some farmers  
10 doing this right. They need to be protected.

11 Thank you. If you have any  
12 questions, I'll try to answer them.

13 MR. GIACOMINI: Thank you.

14 Questions, comments for Mark? Thank you.

15 MR. KASTEL: Thank you very much  
16 for the opportunity. Yes, Kevin.

17 MR. ENGELBERT: Some of the public  
18 comments we read, Mark, said that because of  
19 the standards that have been enacted in  
20 Europe, they now are an importer of organic  
21 eggs. Do you know that to be true or not?

22 MR. KASTEL: Well, no, I know that

1 what we see -- a real phenomenon across the  
2 country is consumers sadly and some retailers  
3 abandoning certified organic eggs and getting,  
4 quote, local eggs, free range eggs. Where the  
5 birds actually do have access to the outdoors.

6           Unfortunately, the primary feed  
7 even though these birds do eat grass, they eat  
8 bugs, they eat seeds, they eat insects and  
9 worms and they're omnivores. They're not  
10 vegetarians and they do eat grass, but grain  
11 is the primary diet. So, these, quote,  
12 natural eggs that are free range and truly  
13 pastured, they might rotate the chicken coops  
14 in the field, they're eating GMO conventional  
15 corn.

16           So, it's certainly hurting our  
17 farmers. It's hurting the organic industry as  
18 a whole because people are looking for more  
19 meaning in their food and they know that there  
20 is a nutritional superiority with pasture-  
21 raised eggs.

22           So, I haven't heard about the

1 European phenomenon yet, but I certainly know  
2 that we're losing organic sales to competitors  
3 that are looking to meet the needs of those  
4 consumers.

5 MR. GIACOMINI: Thank you. Okay.  
6 Any more?

7 MR. KASTEL: Thank you very much.

8 MR. GIACOMINI: Thank you. Next  
9 up is Charlotte. Next up on number one is  
10 Meghann Quinn. Next up on number two is  
11 Leslie Zuck. Charlotte.

12 MS. VALLAEYS: Good morning. My  
13 name is Charlotte Vallaeys. I am a Farm and  
14 Food Policy Analyst with the Cornucopia  
15 Institute and I'm the lead author/researcher  
16 of the Scrambled Eggs Report.

17 I will present arguments for  
18 outdoor access for organic laying hens  
19 responding directly to some of the arguments  
20 that have been used by industrial-scale  
21 producers who would like to see their current  
22 model of .1 square foot per bird outside

1       become the standard.

2                   In some cases, however, there  
3       simply aren't any responses that I can give  
4       when a producer with a quarter million laying  
5       hens in one location argues that it's  
6       difficult to meet certain organic principles.  
7       Maybe a quarter million birds in one location  
8       isn't organic.

9                   I urge you not to change the  
10       standards to fit their model and accommodate  
11       them.

12                   Family-scale farmers, many of whom  
13       are our members, and organic consumers are  
14       seeking an alternative from mono-culture,  
15       highly intensive factory farm models and they  
16       believe strongly that the standards should be  
17       strong closing the loopholes that allow eggs  
18       from these factory farms to pass as organic.

19                   My presentation will include only  
20       a small sampling of the arguments that are  
21       detailed and footnoted in the full report.  
22       There is an entire section devoted to



1       responding to industrial scale producers'  
2       arguments with scientific studies and also  
3       footnoting experiences that we've heard from  
4       producers. So, I encourage everybody to read  
5       the report.

6                 First, some argue that chickens  
7       don't need to go outside to satisfy some  
8       instinctive natural behavior like foraging.  
9       They argue that they can recreate an outdoor  
10      environment indoors with litter on covered  
11      porches.

12                Research published in peer  
13      reviewed academic journals shows that the  
14      diversity of stimuli provided by the outdoors  
15      cannot be matched by indoor environments and  
16      animal welfare specialists have published  
17      studies explaining that the inability to  
18      forage outside under natural conditions  
19      contributes to the aggressive behavior of  
20      feather pecking. This research if  
21      substantiated by the experiences of pasture-  
22      based producers who do not routinely trim

1 their hens' beaks. Because there is no need  
2 when the hens are given enough space and the  
3 ability to peck in the ground not at each  
4 other.

5 Some like the argument that  
6 chickens are not cows and, therefore, they  
7 don't pasture. They make it sound as if  
8 chickens unlike cows were made to be confined  
9 in henhouses with 30,000 or 80,000 other  
10 chickens.

11 They also say that chickens don't  
12 like to go outside. This is simply not true.  
13 Any organic producer who lets his or her birds  
14 out will tell you that chickens that have been  
15 acclimated to the outdoors since a young age,  
16 that have adequate access and that have a rich  
17 outdoor environment love to go outside.

18 In response to our report, some  
19 industrial-scale producers have said why are  
20 you targeting us when all we've done is  
21 figured out a profitable model production  
22 system for organic eggs? Well, have they

1 really figured it out or have they simply  
2 taken the conventional model and substituted  
3 organic feed for conventional feed?

4           Organic is about more than just  
5 substituting one input for another. It's  
6 about changing your system, your approach and  
7 often your mind set.

8           Take as an example the argument  
9 that dirt or outdoor runs cannot be  
10 disinfected, but porches can and, therefore,  
11 are better for reducing the risk of salmonella  
12 and disease. Yes, it's true you can't bleach  
13 a pasture, but that's missing the point of  
14 organics.

15           There are best practices that can  
16 be adopted in an organic system such as  
17 letting the land rest and rotating paddocks.

18           Salmonella contamination is indeed  
19 a concern outdoors, but as the August recall  
20 of half a billion eggs has shown, salmonella  
21 contamination is also a concern in total  
22 confinement operations.

1           The 500 million eggs that were  
2 recalled were produced indoors. Yet, do we  
3 see anybody arguing for the prohibition of  
4 indoor systems? No, of course, not.

5           Since salmonella contamination can  
6 happen anywhere, indoors or outdoors, the key  
7 in both systems is good practices and  
8 preventive measures and I shall also point out  
9 that the FDA officials have shared these  
10 preventive measures for poultry production  
11 systems that include outdoor runs. By no  
12 means are they banning the outdoors.

13           Another health -- oh. Okay. One  
14 minute left.

15           Another argument for sterilized  
16 confinement is that they are keeping the birds  
17 healthy, but consider the research that has  
18 been shown that the reduction of stress  
19 actually builds the birds' immunity and they  
20 are, therefore, better able to deal with  
21 these.

22           So, we would like to see organic

1 egg production conform to consumer  
2 expectations, benefit animal welfare and level  
3 the playing field for organic producers. We  
4 think the standards need to be firm and that  
5 means quantitative standards for stocking  
6 density.

7 If you leave any room for  
8 interpretation or loopholes, they will be  
9 exploited. To keep the current system where  
10 family-scaled producers with pasture or true  
11 outdoor runs are forced to compete in the  
12 marketplace with industrial-scaled producers.

13 In Europe, the standards are 43  
14 square feet per bird outside. Many would like  
15 to see that happen in the United States, but  
16 also, a lot of our members and others have  
17 questioned whether this is commercially  
18 viable.

19 So, I guess my time is up. Any  
20 questions? I'd be happy to answer.

21 MR. GIACOMINI: Any questions or  
22 comments? Jay.

1                   MR. FELDMAN: I'm curious as to  
2 what you see as the viability -- the current  
3 viability of your findings and your  
4 recommendations?

5                   MS. VALLAEYS: Right. So, we  
6 would recommend -- we strongly urge the Board  
7 to switch the recommendation back from 2  
8 square feet outside to 3 square feet outside  
9 which was the original Livestock Committee  
10 recommendation.

11                   And for indoors, we are  
12 recommending 1.78 square feet inside which is  
13 the European standard.

14                   MR. FELDMAN: And given your  
15 research and visits to these poultry houses,  
16 do you see that as commercially viable?

17                   MS. VALLAEYS: Yes, we do and, in  
18 fact, there are going to be some organic egg  
19 producers who are doing it, and they will tell  
20 you how many square feet they give and they  
21 will tell you that it's -- they consider that  
22 to be commercially viable.

1 MR. GIACOMINI: Tracy.

2 MS. MIEDEMA: Charlotte, do you  
3 have any information --

4 MR. GIACOMINI: Oh, are you  
5 picking this up on the mike? Okay. Jay,  
6 microphone please.

7 MR. FELDMAN: Sorry.

8 MS. MIEDEMA: Do you have any  
9 information on what the cost to consumers for  
10 a dozen eggs would be? And I say that not at  
11 all to be argumentative but just to kind of  
12 probe this area that we've gotten so  
13 accustomed to cheap eggs and where we think  
14 the cost of eggs would go.

15 MS. VALLAEYS: Right. Certainly  
16 consumers would pay more, as they do now, for  
17 pastured eggs, and again, I think that this  
18 would be a question for some of the producers.  
19 We see \$6 a dozen for pastured eggs in the  
20 marketplace and yet consumers are paying that  
21 money.

22 So, organic consumers are willing

1 to spend more money if they know that it is  
2 organic, that they are supporting a different  
3 model and that their dollars are going towards  
4 supporting family farmers and animal welfare.

5 So will it cost more than what  
6 you're seeing right now? Yes, probably.

7 MR. GIACOMINI: Kevin.

8 MR. ENGELBERT: Thank you,  
9 Charlotte. Two quick questions.

10 One, you have said that consumers  
11 expect birds to be outside. Have you done any  
12 scientific research to that affect with your  
13 study to know what those percentages might be  
14 if an average organic consumer that picked up  
15 some eggs was asked do you assume these birds  
16 are outside or not?

17 And two, well, if you'll answer  
18 that one first.

19 MS. VALLAEYS: No, we considered  
20 doing that kind of market research, but we did  
21 not do that. So, I don't have scientific  
22 numbers to give you from a study.



1                   But we do have -- again, later  
2                   there will be consumer representatives from  
3                   co-ops, for example, who will tell you just  
4                   from their own experience that when they talk  
5                   to the people who are buying organic foods,  
6                   that they're quite shocked when they find out  
7                   what's really going on. When they buy organic  
8                   eggs, that they are expecting those birds to  
9                   go outside, and when they find out that that's  
10                  not the case, that they are quite shocked and  
11                  frustrated by that.

12                  And certainly, in response to our  
13                  report, as soon as it was released, we had a  
14                  lot of consumer comments comes in that they  
15                  were very grateful for our scorecard, knowing  
16                  exactly the story behind their food and  
17                  telling us thank you for doing this because we  
18                  actually really thought that we were  
19                  supporting a system where the chickens go  
20                  outside.

21                  And so, I mean I think consumers  
22                  certainly are expecting this, but I do not

1 have a number to give you.

2 MR. ENGELBERT: The other quick  
3 question I have is the concerns about keeping  
4 birds inside relevant to the avian flu that  
5 are carried by wild birds seems legitimate,  
6 and that's one thing that I wrestle with.

7 I know there have been no  
8 documented cases of outdoor poultry  
9 contracting these diseases, but in the event  
10 that that does happen, what do you think the  
11 response to organic eggs would be if that was  
12 the case and how do you justify forcing them  
13 outside and then having something like that  
14 take place?

15 MS. VALLAEYS: Yes, under no  
16 circumstances would we want to force birds to  
17 go outside when there is a documented outbreak  
18 of avian influenza, and in fact, temporary  
19 confinements in the occurrence of a disease  
20 outbreak is certainly legitimate, and we would  
21 not be in support of forcing them out when  
22 there is an outbreak. So, we support the

1 temporary confinement in the case of disease  
2 outbreaks.

3 MR. GIACOMINI: Okay. That's it I  
4 think. No other ones. I think that's it.  
5 Thank you, Charlotte.

6 Meghann Quinn on one. Leslie Zuck  
7 on two. Jason Perrault on one on deck.

8 MS. QUINN: Good morning again,  
9 fellows. My name is Meghann Quinn. I'm the  
10 Executive Director of the American Organic Hop  
11 Grower Association.

12 The AOHGA was formed to promote  
13 the use of organic hops by organic hop  
14 growers. So, today, I'm just going to go  
15 through a brief overview of kind of what we've  
16 been dealing with for the last year and our  
17 thoughts on the issue currently.

18 First of all, I want to thank the  
19 Board, especially the Handling Committee, for  
20 their hard work on our issue as well as Miles  
21 and Lisa and all the NOP for all that they've  
22 done to make a success over the last year and

1 also for the opportunity to be up here today  
2 talking.

3 So, for a little background, in  
4 2007, hops were first added to the National  
5 List because it was determined there wasn't  
6 enough organic hops to meet the needs of  
7 organic brewers. But since then, the hop  
8 growers in the U.S. have really made a  
9 commitment to organic production.

10 They've learned a lot over the  
11 last three years, including how to  
12 successfully grow high quality organic hops.  
13 But, having a really hard time selling those  
14 under the current regulatory environment.

15 So, about a year ago, we started  
16 working on a petition to the NOSB to request  
17 the removal of hops from Section 205.606.

18 We are very confident in our  
19 ability to produce the organic hops that the  
20 organic brewing industry needs, and we feel  
21 that the continued placement of hops on the  
22 National List does go against the spirit and

1 intent of law to transition to organic  
2 production.

3 Right now, there's not a lot of  
4 incentive for brewers to enter into forward  
5 contracts. We'll get into a little bit of  
6 that later today, but that is actually  
7 discouraging farmers from growing their hops  
8 organically.

9 So if hops remain, a lot of these  
10 growers are going to be forced to reduce their  
11 organic acreage or exit the industry  
12 altogether, and I don't think that's the  
13 intent of 606.

14 So therefore, we do support the  
15 revised recommendation that the Handling  
16 Committee released a few weeks ago  
17 recommending the removal of hops effective  
18 January 1st, 2013.

19 We do understand that this will  
20 probably mean the recommendation that hops  
21 remain on the list due to the sunset  
22 provision, since that would be to sunset in

1 2012, but we are okay with that as long as we  
2 are working towards this January 1st, 2013  
3 date.

4 Hops are only harvested once per  
5 year. So, that gives two full crop years to  
6 align the supply and demand and really ensure  
7 that we can meet those needs of all the  
8 brewers out there.

9 So, I wanted to keep it relatively  
10 brief. Plenty of time for questions, but  
11 later today, there are some third and fourth  
12 generation hop growers that are really  
13 committed to organic production. They're  
14 going to be talking, going through some more  
15 specifics on quantity and variety issues, as  
16 well as educating on the unique nature of the  
17 hop industry and its reliance on forward  
18 contracting.

19 There's also a few people here  
20 that are working to develop organic production  
21 in different areas of the U.S. that specialize  
22 in organic production. So, you'll hear from

1 all of them later.

2 So, we really encourage you to ask  
3 questions and we want you to leave here today  
4 with a clear, confident understanding of why  
5 it's time for hops to be removed from the  
6 National List.

7 So, any questions?

8 MR. GIACOMINI: Questions for  
9 Meghann? Seeing none. Thank you, Meghann,  
10 very much.

11 MS. QUINN: All right. Thanks,  
12 guys.

13 MR. GIACOMINI: Leslie Zuck on  
14 two. Jason Perrault on one. Next on two, Tim  
15 Callahan.

16 MS. ZUCK: Hello. I'm Leslie  
17 Zuck. I'm the Executive Director of  
18 Pennsylvania Certified Organic.

19 Before I start, I just want --  
20 since there's a number of our PCO poultry  
21 producers in the room here and our accreditor  
22 as well, I'd like to just publicly state that

1 PCO does not allow enclosed porches for  
2 poultry production, although the Cornucopia  
3 website does say that we do. So, I want to  
4 set the record straight on that. Never have  
5 and as far as I know, never will.

6 And that PCO does support the need  
7 for guidance and rulemaking on organic poultry  
8 outdoor access requirements.

9 Let me get my computer to work  
10 here.

11 I also do want to thank the CAC  
12 Committee and particularly Joe Smillie our  
13 certifier rep on the Board for all their work,  
14 and as a member of the Accredited Certifiers  
15 Association Board, I particularly appreciated  
16 Joe's participating on our calls and keeping  
17 us informed on the Committee's work. That's  
18 really improved, I think, a lot of the quality  
19 of their work and our work and I appreciate  
20 that and I hope it will continue.

21 So, the title of my comment is, A  
22 Cow is Not a Package. Does that clue you in



1 on what I'm going to talk about?

2 Of course, we all know that, and  
3 we do appreciate the CAC Committee clarifying  
4 it just in case there are some people out  
5 there who might think otherwise.

6 But, unfortunately, clarifying  
7 that a cow is not a package is really not  
8 enough to stop the uncertified auctioneers who  
9 are holding organic livestock auctions, nor  
10 will it deter uncertified traders and brokers  
11 from buying and reselling supposedly organic  
12 products, whether or not they're a railcar of  
13 soybeans or they're wrapped bales of hay are  
14 considered to being closed in a container.

15 The clarification is very helpful,  
16 although it's not enough. I'm still not sure  
17 whether a wrapped bale of hay is a package,  
18 but my real point here is to say that that's  
19 not the point.

20 The issue, at least in our  
21 experience, has not really been whether the  
22 cow or railcar load of hay or even a wrapped

1       bale is a container. The issue with these  
2       buyers and sellers of organic products who  
3       take some form of title to the goods as you  
4       say in your recommendation and sell it to  
5       multiple buyers is whether these traders fit  
6       the definition of handling operation in the  
7       first place.

8                   If they don't fit that definition,  
9       they are simply not subject to the rule at  
10      all, regardless of whether they shrink wrap  
11      their cows. Okay.

12                   In other words, rather than  
13      starting with Section 101(b), which describes  
14      the exclusions, which is what your  
15      recommendation was about to clarify, we need  
16      to start with Section 205.100(a) which  
17      describes what has to be certified and what  
18      that says is except for operations exempt or  
19      excluded, and I'll just ignore that for a  
20      minute, each production or handling operation  
21      that produces or handles crops, livestock,  
22      livestock products, et cetera must be

1 certified.

2           So, what that means in order to be  
3 subject to our rule in the first place, you  
4 have to be a production or handling operation  
5 and you must produce or handle something and  
6 if you don't fit the definition, the rule  
7 doesn't apply to you and neither do the  
8 exclusions and exemptions.

9           So to find out if our hay broker  
10 or auctioneer is subject to the rule, what we  
11 do is we read the definitions. Everybody's  
12 favorite part of the rule. Right?

13           And the definition of handling  
14 operation is any operation or portion of an  
15 operation that receives or otherwise acquires  
16 agricultural products and processes, packages  
17 or stores such products, and that's where the  
18 problem is because these traders although they  
19 do receive and acquire that organic product,  
20 they're not processing or packaging or storing  
21 it, and so that's the problem we run into.

22           We really would like to close what

1 we call at PCO the hay broker loophole and the  
2 CAC Committee did a really, really good job of  
3 describing why this is a huge problem as our  
4 industry has sort of grown up all around us.

5 We know for a fact that there are  
6 uncertified hay brokers in Pennsylvania that  
7 buy and sell organic and nonorganic hay at the  
8 same time, sometimes on the same load. They  
9 keep zero records and they have lots of  
10 Xeroxed copies of certificates, which they do  
11 hand over to the buyer. Okay. But, there is  
12 absolutely nothing -- you know, there's no  
13 audit trail.

14 So, you know, basically, this  
15 leaves a huge gap. We call it almost a Grand  
16 Canyon in some cases in the audit trail.  
17 Because there's no link between the source of  
18 the organic product and the buyer of the  
19 organic product. They aren't able to then  
20 show to their certifier that they purchased  
21 that feed from an organic source.

22 With auction houses, it's even

1 scarier because there are hundreds of animals  
2 -- and I know there are some northeast  
3 certifiers here who will verify this. They're  
4 going through this auction house and they're  
5 sold within a few hours. Okay. All the  
6 documents leave the site with those cows.  
7 There's absolutely nothing left to audit.  
8 Nothing at the office or anything. There's  
9 nothing there. So, this is a problem.

10 That's one minute or is that the  
11 time? Oh.

12 MR. GIACOMINI: That's it.

13 MS. ZUCK: Well, Joe will have  
14 some questions for me I think.

15 MR. GIACOMINI: Kevin?

16 MR. ENGELBERT: Yes, would you  
17 finish your comment Leslie and then I have a  
18 question for you.

19 MS. ZUCK: Just one more sentence.  
20 Whether fixing this would require a technical  
21 correction or a rule change, I really don't  
22 know. I just wanted to point it out to you

1 all on the committee in case you might want to  
2 take a look at it and maybe address the  
3 definition issue in your recommendation.

4 And as a side, the definitions for  
5 handle, handler, and handling operation are  
6 all different, and they conflict and they're  
7 contradictory. So, I think that's another  
8 problem that we should probably try to fix.

9 MR. ENGELBERT: Leslie, how do  
10 have a hay-broker sell hay to a farmer, hand  
11 over a certificate, but not hand over  
12 transaction certificate or a statement saying  
13 which farm produced that hay and the lot  
14 number that it was produced by?

15 MS. ZUCK: Well, Kevin, we are  
16 currently requiring that, but there's nothing  
17 in the rule that will support us in requiring  
18 that at this point.

19 We do ask -- because the issue for  
20 those of you who aren't familiar with it is  
21 that the farmer is showing the inspector,  
22 here's my certificate for the hay and the

1 certificate for the hay says, you know, Farmer  
2 GA, an organic farmer, has produced this hay,  
3 but then the farmer actually paid the broker  
4 over here. So, the invoice has the broker's  
5 name on it. The certificate has the farmer's  
6 name on it. They don't match up.

7 We are, as a stop gap measure,  
8 requiring that those sellers and those traders  
9 give an invoice, but they don't want to do  
10 that because then they're showing the farmer  
11 how much they paid for it. So, they're having  
12 to give them that and they don't want to do  
13 that and the rule really doesn't require them  
14 to do it because they're excluded.

15 MR. GIACOMINI: Joe.

16 MS. ZUCK: I mean not excluded.  
17 They're not --

18 MR. SMILLIE: What about the  
19 stores? The word stores in the handling  
20 operation. Is it always on the fly?

21 MS. ZUCK: Not always, but most of  
22 the time.

1 MR. SMILLIE: Most of the time  
2 it's on the fly.

3 MS. ZUCK: They're basically not.  
4 They're --

5 MR. SMILLIE: So, they never  
6 really --

7 MS. ZUCK: Yes, there are some who  
8 store it.

9 MR. SMILLIE: So, they're included  
10 in it the --

11 MS. ZUCK: Yes, and we look at  
12 that.

13 MR. SMILLIE: Okay.

14 MS. ZUCK: But, if they're not  
15 storing it, they're just basically either  
16 trading it, not taking title to it or --

17 MR. SMILLIE: Right.

18 MS. ZUCK: -- taking title to it  
19 and just taking it on the truck over from one  
20 place to another. They're not --

21 MR. SMILLIE: And the other thing  
22 then as part of the audit trail, someone's --



1 I mean we all agree that you don't have to be  
2 certified to transport unless you're shipping  
3 to the EU. But, someone has to be responsible  
4 for that part of the audit trail. It's either  
5 the seller or the buyer. Somebody is  
6 responsible to ensure that the transport is  
7 also covered as part of the process.

8 MS. ZUCK: And that all sounds  
9 good in theory, but in practice, the organic  
10 farmer is buying this product with a  
11 certificate and they're kind of left holding  
12 the bag at their inspection because they --  
13 you know, they didn't have any reason to look  
14 behind that certificate when it was handed  
15 over to them.

16 MR. SMILLIE: But the certificate  
17 that they're holding is not the certificate of  
18 the person that sold it to them.

19 MS. ZUCK: Right. That's the  
20 problem.

21 MR. SMILLIE: Yes. But, someone  
22 has to be responsible for the transport

1 affidavit.

2 MS. ZUCK: Right. So, which one  
3 should be responsible? The buyer or the  
4 seller?

5 MR. SMILLIE: Yes, well.

6 MS. ZUCK: Okay. And who's going  
7 to audit to make sure that that was the actual  
8 transport affidavit that came with that load.  
9 Because there's no audit trail to go back and  
10 check it. There's no -- we don't have any  
11 authority to go and check any of these  
12 transactions whatsoever, and neither does the  
13 USDA at this point in my opinion.

14 MR. GIACOMINI: Tracy.

15 MS. MIEDEMA: Well, as a  
16 Committee, our goal here was to bring  
17 attention to this issue.

18 MS. ZUCK: Good job.

19 MS. MIEDEMA: And, you know,  
20 ultimately, this is an issue at NOP and I have  
21 a question then for the program on whether  
22 these potential loopholes where there might be

1 a laundering of nonorganic into organic  
2 supply, whether that's on the program's radar  
3 screen?

4 MR. MCEVOY: Yes, this is one area  
5 we're working on: guidance for exempt and  
6 excluded operations, which ones are in that  
7 category. So, we're working on that  
8 particular issue. This is going to be very  
9 helpful. The recommendation from the Board on  
10 this particular issue.

11 I would just say that if you can't  
12 -- if there's not an adequate audit trail,  
13 then there's a problem and there should be  
14 some noncompliances at least that happen. You  
15 have to be able to track the product back to  
16 the farm, and you do have -- record-keeping is  
17 a requirement and following the audit trail is  
18 a requirement.

19 So, I would say that you do have -  
20 - you might not have the authority to -- they  
21 could refuse you access to their records, the  
22 uncertified operation, but you have an

1       inadequate audit trail, then you should not be  
2       granting certification.

3                   MS. ZUCK:   Yes, we do check that.  
4       As I said, we require that now, but the  
5       problem is that nobody can make sure that  
6       those are actual true documents.  There's no  
7       inspection of that trader.

8                   So, the people who are passing  
9       through those documents, they're going from  
10      the certified operation to a noncertified  
11      operation to a certified operation and there's  
12      no way that we can check to make sure that  
13      isn't just a copy of the last load that he  
14      sold last month or a copy -- you know, there's  
15      no oversight for that.

16                  MR. SMILLIE:  Yes, judging from  
17      your comment, Miles, this is already covered  
18      under the regulation you feel.  We don't need  
19      to make any technical corrections or rule  
20      changes on this one.  Right?

21                  MR. MCEVOY:  Well, in terms of  
22      your recommendation whether we'd have to make

1 any rule changes or not --

2 MR. SMILLIE: Well, our  
3 recommendation doesn't ask for any rule change  
4 or technical correction.

5 MR. MCEVOY: Right. So, we'll  
6 take a look at that and see whether or not  
7 that's actually true. Whether or not we can  
8 do what you're asking through guidance versus  
9 whether it needs a rule change and so, we'll  
10 take a look at that.

11 MR. SMILLIE: It sounds like from  
12 what Leslie pointed out which is true is that  
13 we may need to clean up the handling  
14 definition. We saw that in, you know, the  
15 private labeling issue also awhile back, as I  
16 recall. Those definitions may need to be  
17 cleaned up and that would be a change.

18 MR. MCEVOY: Right. And the  
19 problem with the handling definitions, they're  
20 straight out of OFPA. So, therefore, you have  
21 a more difficult -- yes.

22 MR. GIACOMINI: John.

1 MR. FOSTER: Thanks, Leslie.

2 Agree with you all the way on that.

3 The goal here was to take a very  
4 discreet item and deal with it. It's a small  
5 piece of the pie of concern and my  
6 observations have been when you try and get  
7 too many pieces of the pie at once, you get  
8 none of the pie.

9 So, the goal here was a very  
10 discreet, small section of what needs to be  
11 done. Hopefully, it doesn't require a  
12 regulatory change.

13 But, I would suggest to whoever  
14 chairs the CACC to take up your suggestion  
15 about 205.100(a) as well on the next work  
16 plan. So, I see that fitting together very  
17 well, which is --

18 MS. ZUCK: I think that was a huge  
19 help. I wouldn't say it was a small piece of  
20 the pie. I think it was a large piece of the  
21 pie. I think it's really help certifiers to  
22 close that loophole.

1 MR. GIACOMINI: Seeing no more,  
2 thank you, Leslie.

3 Next up, one second here, Jason  
4 Perrault. Tim Callahan on two. Liana on one  
5 on deck. Yes.

6 MR. PERRAULT: Thank you for the  
7 opportunity to come and speak to you today.  
8 I'm speaking in support of the American  
9 Organic Hop Grower Association's petition to  
10 remove hops from the 205.606 list.

11 I'm additionally speaking in  
12 support of the Handling Committee's  
13 recommendation to remove hops as well by the  
14 date of January 1st, 2013. It's appreciated  
15 that the Handling Committee went back and  
16 amended their initiation recommendation.

17 As a hop breeder and a fourth  
18 generation hop grower, my reasons for wanting  
19 hops removed are quite simple. Principally,  
20 I think it's the right thing to do and I think  
21 it's the right time to do it. Practically, it  
22 has had the affect of completely stifling our

1 market.

2 We've been growing organic hops  
3 for four years now, and we have currently  
4 unsold inventory dating back for three of  
5 those four years, and in fact, it wasn't until  
6 the AOHGA petition was made public that we had  
7 any inquiries -- active inquiries regarding  
8 our hops. So, I think that serves to point  
9 out the inequities in the system.

10 We haven't had any inquiries,  
11 whether it be for forward contracts which is  
12 the standard practice in hops or for specific  
13 varieties, and opponents to the petition tend  
14 to key in on the variety issue. Particularly,  
15 that there is not enough varieties available  
16 to brew the beers they want to brew.

17 Not only is this line of reasoning  
18 flawed, it seems to point out that there are  
19 inequities with regard to hops that other  
20 crops are not subject to. It is standard  
21 practice in organic agriculture and in line  
22 with the standards of organics itself that



1 growers should select varieties based upon not  
2 only market demand, but their ability to be  
3 grown under an organic system with minimal  
4 inputs. That's part of smart selection  
5 practices.

6 So, this would imply that not all  
7 varieties will be or even should be made  
8 available organically and there are 150 plus  
9 known hop varieties out there. This is really  
10 a standard that's unique to hops and I don't  
11 think any other crop is held to.

12 It has also been argued that the  
13 current system accounts for this by requiring  
14 brewers to actively try to source their  
15 varieties and for certifiers to verify their  
16 attempts, and I appreciate the intent with  
17 that, but it simply hasn't worked and we are  
18 a good example of how that has not worked for  
19 us. So, there's an obvious disconnect there  
20 between the grower up to the brewer level.

21 And there hasn't been past  
22 opposition to this, and the initial petition

1 to add hops to a list has failed to offer  
2 solutions to the growers to this dilemma.

3 As growers, we don't have any  
4 direction at all as to what varieties should  
5 we be growing. So, it's left to us to try to  
6 guess what the brewers are demanding.

7 And I think it's also critical to  
8 note here that despite what opponents might  
9 say, every style of beer can be brewed with  
10 the 30 plus varieties that are grown  
11 organically right now. To say otherwise is  
12 misrepresentation of fact.

13 Which really then it boils down to  
14 becoming an issue of flavor profile. So,  
15 while every style can be brewed, it can be  
16 argued that well, I can't get the flavor  
17 profile I'm looking for, but as I mentioned,  
18 we're currently growing 30 plus varieties.  
19 Used in different combinations, this offers an  
20 endless myriad of flavor profiles.

21 So additionally, you know, perhaps  
22 this implies that -- by inclusion on the list,

1 this is implying that all varieties of hops  
2 should be made available, but perhaps more  
3 importantly, it's implying that flavor profile  
4 outweighs the principals of organic  
5 production.

6 Additionally, the issue of flavor  
7 profiles is a short-term issue. By removing  
8 hops from the list, it'll force open lines of  
9 meaningful communication from the grower level  
10 to the brewer level which will allow us as  
11 growers to supply the varieties that the  
12 brewers truly want to create those flavor  
13 profiles they're after and to provide the  
14 consumer of organic beers with the confidence  
15 in the integrity of the organic label.

16 Thank you.

17 MR. GIACOMINI: Joe.

18 MR. SMILLIE: Thank you. I held  
19 back my comments from Meghann and I wanted to  
20 thank Meghann for her great work on behalf of  
21 the hop growers and the beer industry in  
22 reaching a compromise. We're trying to limit

1 our questions and statements, but it's great  
2 to have you as a grower in front of us.

3 My first question is, who are  
4 certified by?

5 MR. PERRAULT: WSDA, Washington  
6 State Department of Agriculture.

7 MR. SMILLIE: Are most of the  
8 Yakima Valley growers certified by WSDA?

9 MR. PERRAULT: I would say all the  
10 organic Yakima growers are.

11 MR. SMILLIE: Huh. I phoned WSDA,  
12 but maybe I didn't talk to the right people.  
13 That's good. You've got a certificate. No  
14 more questions on that issue.

15 The three year unsold inventories  
16 and no inquiries is particularly troublesome.  
17 Again, as everybody knows, 606 doesn't mean  
18 you can just use conventional. It just means  
19 that if organic isn't available, you can use  
20 conventional. So, again, we've got a  
21 disconnect between the commercial availability  
22 requirements in hops and the fact that you've

1 received no inquiries whatsoever is  
2 particularly troublesome, and hopefully we'll  
3 solve that.

4 Because I truly believe and again  
5 there's a very different opinion from other  
6 people, but I truly believe putting something  
7 on 606 to start an industry and then pulling  
8 it off is the way 606 is suppose to work. 606  
9 is suppose to spur the production of organic,  
10 not limit it and some people feel that when  
11 you put it on 606, that limits the growth of  
12 an organic industry. I disagree completely.

13 The whole idea, and I think the  
14 way it should work and hopefully will work is  
15 that it will get organic production going so  
16 that we can take it off. That's the plan and  
17 that's how it's supposed to work.

18 The variety issue, I think you've  
19 spoken to I think very well and a lot of us  
20 are -- you know, that was what was presented  
21 to us by the brewers. You know, I'll just  
22 read you a statement.

1 "Light bitterness of this lager is  
2 accredited," accredited I love that word, "to  
3 a crisp Hallertauer and spicy Tettang variety  
4 with a flavor aroma from Hallertauer,  
5 Hersbrucker, and ..."

6 You know, the whole brewing  
7 industry really, you know, markets their  
8 product based on, nowadays, not their malt so  
9 much which, is pretty standard. I mean  
10 there's different malts, but they base it on  
11 the whole hop issue.

12 So, the variety issue is  
13 important. I think you've addressed that when  
14 you said that with the 30 available you feel  
15 that all the flavor profiles can be met. I'm  
16 hoping that we'll hear from brewers to get  
17 their agreement.

18 I also wanted to thank you  
19 profusely for your statement saying that with  
20 that said we're also cognizant of the  
21 potential risk to our brewery customers posed  
22 by a swift or abrupt removal and I take it

1 that you've spoken in favor of the January 1st  
2 deadline.

3 MR. PERRAULT: Correct.

4 MR. SMILLIE: So, I appreciate you  
5 coming here. I appreciate all of the work you  
6 guys are doing and I think we're on track now  
7 to make that happen.

8 MR. PERRAULT: Great. Thank you  
9 very much.

10 MR. GIACOMINI: Kevin.

11 MR. ENGELBERT: I will resist the  
12 temptation to get into the 606 argument at  
13 this point with Joe.

14 MR. GIACOMINI: Please.

15 MR. ENGELBERT: And stick right to  
16 my question for you. What percentage of the  
17 hops that are grown are contracted and what  
18 percentage are sold on the spot market. You  
19 know, like Joe said, your three year supply  
20 and not getting a call is very troublesome and  
21 I'm wondering, you know, if hops did sunset,  
22 what's the time frame? Is it possible for

1 contracts to go out and hops be grown to meet  
2 the demand for certified organic hops?

3 MR. PERRAULT: Yes, to address the  
4 first part of that, I would say that about 95  
5 percent of the conventional market is  
6 contracted or contracting.

7 Right now, I can speak for our  
8 farm and I'm aware of other farms in the area.  
9 Essentially zero contracts are in place for  
10 organic production, and I know that for a fact  
11 for our farm and I think that goes for the  
12 other Yakima farms as well.

13 With regard to can the growers  
14 respond? Can these contracts be put in place?  
15 Absolutely. We're sitting in a position that,  
16 you know, we would be ready and willing to  
17 sign contracts now and we could technically  
18 respond within a year.

19 You know, if a brewer came to me  
20 today and said I need, you know, 10,000 pounds  
21 of X variety, I have the acreage and the  
22 capabilities to get that production in the



1 ground and get that to him by next year.

2 But we also understand that there  
3 is a period of time where, you know, brewers  
4 need to time to kind of get those things in  
5 place and that's why we support the extended  
6 deadline.

7 MR. GIACOMINI: Kevin.

8 MR. ENGELBERT: One follow up.  
9 What's to be gained from the two and a half  
10 month time period from when it was originally  
11 scheduled to sunset in the middle of October  
12 2012 to January 1st, 2013? The growing  
13 season's already over. The new season hasn't  
14 started. What's the gain there?

15 MR. PERRAULT: Well, I think our  
16 initial -- you know, our initial attempt was  
17 to remove hops sooner, and then the  
18 recommendation came back for the January 1st  
19 deadline and I think that was a reasonable  
20 amount of time for us and that two and a half  
21 months, I suppose, you know, it could be  
22 important from the contracting standpoint in

1 terms of getting through that next crop year,  
2 seeing what volumes are available and then  
3 moving that into a contract situation.

4 MR. GIACOMINI: Jeff.

5 MR. MOYER: Thank you, Mr.  
6 Chairman. Kevin asked my question. It was  
7 about contracts.

8 MR. GIACOMINI: Okay. Any  
9 further? Jay.

10 MR. FELDMAN: Thank you for your  
11 comments and I appreciate the input of the  
12 American Organic Hop Grower Association and  
13 the Committee's work on this.

14 I'm curious. Did you mention that  
15 you had outreach to brewers on this previous  
16 to this discussion with the NOSB?

17 MR. PERRAULT: Yes, we have  
18 reached out and both the brewers and handlers  
19 saying, you know, this is what we have.

20 MR. FELDMAN: And what was the  
21 response?

22 MR. PERRAULT: Typically, the

1 response is ah, well, we're not interested in  
2 those varieties.

3 MR. FELDMAN: Okay.

4 MR. PERRAULT: And this comes  
5 despite the fact that, you know, half of our  
6 production is in a high alpha variety. Which  
7 from a bittering standpoint in beer, you could  
8 make the argument you could substitute any hop  
9 on the early side of the boil, and these are  
10 about as high a alpha as you can get. So.

11 MR. FELDMAN: Thank you.

12 MR. GIACOMINI: Miles.

13 MR. MCEVOY: Yes, a point of  
14 clarification, the sunset date for hops is  
15 June 27th of 2012, not -- so, it's more like  
16 six months. Not two and a half months.

17 MR. GIACOMINI: Six months. Okay.  
18 That's the question I have. What is the  
19 harvest period on hops typically and how  
20 variable is it in different parts of the  
21 country?

22 MR. PERRAULT: Well, in the

1 Pacific Northwest where the bulk of the hop  
2 production occurs, the harvest starts about  
3 the third week of August and extends through  
4 the end of September, and I would venture to  
5 guess that even in other growing regions, it's  
6 going to be similar.

7 MR. GIACOMINI: Okay. This is  
8 something I'll bring up for the Committee  
9 tomorrow. I'm just confused as to why we're  
10 setting up a sunset or a roll off -- rollover  
11 on this and where we're going to have -- we're  
12 allowing a harvest. We're going three months  
13 in and then suddenly in the middle of the  
14 year, we're so -- just that will be something  
15 we'll discuss tomorrow or whenever.

16 Any further? Okay. Thank you.

17 MR. PERRAULT: Thank you.

18 MR. GIACOMINI: Tim Callahan on  
19 two. Liana on one and Will Fantle with a  
20 proxy on two.

21 MR. RIGBY: Great. Thank you.

22 Good morning. My name's Graham Rigby, Vice

1 President of Innovation at New Chapter. I'm  
2 actually a proxy for Tim Callahan, our VP of  
3 Quality.

4 New Chapter is a leading dietary  
5 supplement manufacturer and the first full-  
6 line supplement company to become certified  
7 organic in 2005. We believe strongly in  
8 organics as organic food and supplements  
9 foster the health of people and the planet.

10 As a dietary supplement company,  
11 our commitment to our consumers is to promote  
12 their health and wellness through  
13 supplementing nutrients that they do not get  
14 enough of from their diet.

15 We've come today to express our  
16 concern over a recent interpretation by FDA  
17 over accessory nutrients allowed in organic  
18 products. The National List of allowed and  
19 prohibited substances 205.605(b) provides  
20 guidance for an extensive list of allowed  
21 accessory nutrient vitamins and minerals for  
22 organic and made-with-organic products. This

1 law specifically refers to 21 CFR 104 which in  
2 turn also references 101.9 for lists of  
3 allowed vitamins and minerals.

4 It's important to note that within  
5 these chapters there is specific language  
6 104.2(f) that provides guidance that all  
7 accessory nutrients permitted by applicable  
8 regulations listed throughout these chapters  
9 are allowed and not just those listed in any  
10 one subsection.

11 It's our understanding that two  
12 omega fatty acids currently included in  
13 organic products but not listed in 21 CFR Part  
14 104 or 101.9 have provoked a recent  
15 reinterpretation of allowable accessory  
16 nutrients by FDA.

17 Specifically, FDA has indicated to  
18 NOSB that 104.2(f) includes only nutrients  
19 that are listed in 104.2(d)(3). This  
20 subsection is a far more restrictive list and  
21 would effectively disallow nutrients, many of  
22 which have an established RDA, and all of

1 which were originally supported by the TAP  
2 formal review process.

3 Vitamin K is one of the critical  
4 nutrients not included in 104.2(d)(3), but  
5 that is found and allowed for inclusion in  
6 organic products because of its presence in  
7 the rest of those chapters. I will briefly  
8 describe its common food sources and  
9 biological role to underscore the serious  
10 implications of FDA's recent reinterpretation.

11 According to the USDA database,  
12 the food sources with the most abundant levels  
13 of vitamin K are green leafy vegetables: kale,  
14 collards, spinach, turnip greens in  
15 particular. The most bio-available form of  
16 vitamin K, vitamin K2, is found most commonly  
17 in fermented soy products and particularly  
18 high levels are found in a popular Japanese  
19 food called natto.

20 Green leafy vegetables, despite  
21 nutritionists' best efforts, are not a staple  
22 in most Americans' diets and natto which

1 tastes like vomit --

2 MR. SMILLIE: I object.

3 MR. RIGBY: It's an acquired  
4 taste. Isn't likely to catch on in the U.S.  
5 anytime soon. Given the few dietary sources  
6 of vitamin K available on the average American  
7 diet, the case for supplementation is clear.  
8 This is exactly the need New Chapter and other  
9 certified organic supplement companies  
10 fulfill.

11 Vitamin K2 plays a critical role  
12 in bone and cardiovascular health.  
13 Specifically, it helps keep calcium out of  
14 your arteries where you don't need it and in  
15 your bones where you do.

16 Recent studies showing a linkage  
17 between isolated calcium supplementation and  
18 cardiovascular events among women underscores  
19 what can happen when you don't have enough of  
20 this critical nutrient to keep calcium in the  
21 bones, where it belongs.

22 This is just one example of many



1 nutrients that would be excluded if NOSB heeds  
2 FDA's reinterpretation of 21 CFR Part 104.

3 We strongly recommend NOSB reject  
4 this reinterpretation and keep accessory  
5 nutrients as originally drafted and allow for  
6 the continued inclusion of all nutrients  
7 including vitamin K and other incredibly  
8 important nutrients such as selenium listed in  
9 the entire chapters of 21 CFR 104 and 101.9.

10 The failure to do so would force  
11 certified organic supplement companies into a  
12 difficult decision: remove critical nutrients  
13 that support health and wellness or abandon  
14 organic certification.

15 Both choices are a compromise. A  
16 compromise that current regulations and the  
17 original interpretation does not force.

18 This is exactly why we believe the  
19 regulations as currently written need no  
20 reinterpretation.

21 If you have any questions on this  
22 matter, I'm certainly here and Tim Callahan,

1       our VP of Quality, will be here the next  
2       couple of days.

3                   MR. GIACOMINI: I just have to  
4       support Mr. Smillie over here. Whatever natto  
5       may be lacking in flavor, it makes up for in  
6       texture. So, we'll just go there.

7                   Any other comment? Tracy.

8                   MS. MIEDEMA: I have a question.  
9       Thank you.

10                   You are referencing a recent  
11       action by FDA. Are you referring the NOP memo  
12       that reinterpreted usage of accessory  
13       nutrients and they reference a conversation  
14       with FDA or is there some other action?

15                   MR. RIGBY: No, I believe it's  
16       that memo in particular.

17                   MS. MIEDEMA: Okay.

18                   MR. RIGBY: Yes.

19                   MS. MIEDEMA: Then this might be a  
20       time to ask the program about that  
21       conversation with FDA, whether there is  
22       anything more formal that helps us understand

1 what (d)(3) was interpreted narrowly and I'm  
2 talking about 21 CFR 104.2(d)(3) as opposed to  
3 this more broader interpretation that this  
4 gentleman is describing with the (f).

5 MR. MCEVOY: Yes, we're working on  
6 the draft guidance for the nutrient vitamins  
7 and minerals that will reflect what we stated  
8 in April at the last NOSB meeting. That is  
9 our understanding of the meaning of 21 CFR  
10 104.20 and in that publication of that draft  
11 guidance, we'll provide additional information  
12 of why we believe that's the correct  
13 interpretation of that particular citation.

14 MR. GIACOMINI: Thank you, Miles.  
15 Any further questions for the speaker? Okay.  
16 Thank you very much.

17 Do a quick survey of the Board  
18 here? We're coming up on 11:50. What is  
19 anyone's opinions, feelings on what we're  
20 looking for and when to take a break for  
21 lunch? Twelve? You want to look at noon?  
22 Leslie's saying no. Do we listen to Leslie or

1 do we listen to Joe? That's tough. The  
2 agenda says 12:30. You want to stay at 12:30?  
3 Okay. We'll stay on that then.

4 So, Liana is next up on one. Will  
5 Fantle with a proxy on two. Grace Marroquin  
6 next up on one.

7 MS. HOODES: Good morning. My  
8 name is Liana Hoodes with the National Organic  
9 Coalition. The Coalition is a national  
10 alliance of organizations representing  
11 farmers, environmentalists, other organic  
12 industry members and consumers concerned about  
13 the integrity of the national organic  
14 standards.

15 NOC would like to thank the Board  
16 for your ongoing work and specifically thank  
17 the outgoing Board Members, Dan, Jennifer,  
18 Kevin, Jeff and Joe.

19 Okay. I'm going to go fast.  
20 Inerts and pesticides, we support the minority  
21 opinion of the Crops Committee for inerts. We  
22 encourage the Board to expedite the

1 implementation of the inert guidance adopted  
2 in April 2010 and limit the time frame for  
3 relisting to three years. The list for  
4 materials may not be either inert nor are they  
5 necessarily of minimal concern. They are  
6 often toxic and harmful to the environment.

7 Hops: We agree with the revised  
8 recommendation. Thank you, Handling  
9 Committee. It's time for hops to come off 606.

10 In general and in specific,  
11 consumers expect agricultural products to be  
12 organic.

13 In addition, we suggest the Crops  
14 Committee be part of 606 review where it  
15 involves agricultural products. They would  
16 have more access to farmers. We suggest that  
17 they also look for organic growers'  
18 associations and ask them in and review the  
19 ACA 606 website and we really appreciate the  
20 additional committee recommendation where you  
21 delineated where you got the information.  
22 That's very helpful. Thank you.

1 Ditto for Chia.

2 Sodium nitrate, we agree with the  
3 NOP's memo requesting the NOSB consider  
4 prohibiting this material. We encourage the  
5 NOSB to remove the annotation for sodium  
6 nitrate which allows its use. Because of its  
7 high solubility, sodium nitrate is an example  
8 of a material that's prone to use in  
9 production system based on input substitution  
10 and can be used to facilitate tenuous cropping  
11 as opposed to restoring fertility through  
12 cover cropping.

13 Nanotechnology: Nanotech is a new  
14 technology producing new materials that pose  
15 significant threat to health and the  
16 environment. We agree with the Materials  
17 Committee proposed definition. However, we  
18 are disappointed that the Committee is  
19 recommending no action pending a symposium.

20 NOSB says itself there is an  
21 overwhelming agreement to prohibit the  
22 technology. We specifically propose: (1.)

1 Define nanotechnology products as synthetic.

2 (2.) Immediately prohibit nanotechnology as a  
3 prohibited method under 205.105 new Section  
4 (h) and (3.) Prohibit packaging made with  
5 nanotechnology under 205.272(b)(1).

6 Corn steep liquor. We agree with  
7 the recommendation to reclassify CSL as a  
8 synthetic material. We also agree it's  
9 another watershed issue for the Board and find  
10 the Crops Committee latest paper very helpful.

11 With regards to the definition of  
12 chemical change, we encourage simple and clear  
13 definitions and we concur that the most recent  
14 definition of chemical change is contrary to  
15 common understanding.

16 Sunset review process: We  
17 appreciate the work that's been done on the  
18 sunset review policies. It's much clearer and  
19 much more closely resembles original thinking  
20 on this.

21 We find the Policy Development  
22 Committee proposal to be acceptable with the

1 following qualifications. (1.) The ability to  
2 use a more comprehensive technical advisory  
3 panel consisting of three independent reviews  
4 rather than the single review when the issues  
5 are complicated or controversial and then (2.)  
6 Revision of the Board policy manual as soon as  
7 possible to include the allowance of amended  
8 annotations as outlined in this recommendation  
9 during sunset review.

10 Animal welfare: Animal welfare is  
11 really a basic principle of organic production  
12 and we know that consumers expect this.

13 The consumer expectations have led  
14 to the proliferation of lots of animal welfare  
15 labels and we're distressed that in the face  
16 those specifically labels, organic seems to be  
17 left behind. It's now time for organic to  
18 take the lead in setting the standards for  
19 ample outdoor access for all livestock  
20 species.

21 The stocking rates: It looks like  
22 some more work needs to be done.



1                   Apiculture: We support this NOSB  
2                   recommendation for organic apiculture  
3                   production.

4                   Origin of livestock: We support  
5                   the recommendations from the Northeast Organic  
6                   Dairy Producers Association.

7                   This made with label, we disagree  
8                   with the CACC recommendation. Don't  
9                   understand the certified to USDA guidelines  
10                  being put on a label. We think the current  
11                  made with label is fine.

12                  We support Leslie's comments on  
13                  the 101(b). Certify the handlers and brokers  
14                  and move that along to close that gap.

15                  Finally, we talked in our comments  
16                  about a proposal for proactive approaches to  
17                  the National List. One is nonregulatory. The  
18                  other is regulatory.

19                  Regarding the Board's work on 606  
20                  petitions, we'd -- okay. Well, we'd propose  
21                  an additional to the 606 petitions.

22                  MR. GIACOMINI: Questions? Jay.

1 MR. FELDMAN: Thank you. Thanks,  
2 Liana.

3 Could you just give us a thumbnail  
4 of the proposal on the 606?

5 MS. HOODES: Yes, really fast. We  
6 think that when you come to petition material  
7 that you add some information about a rough  
8 time line about how you see it going off.  
9 What are current possible alternatives and how  
10 would they possibly be developed in the next  
11 five years and who would be the natural  
12 partners for development?

13 Obviously, a problem there is if  
14 you're the petitioner, you're not necessarily  
15 going to be the person either interested or  
16 knowledgeable about the alternatives, but we  
17 think it's a step and it would help you as the  
18 Board when you review the product to have like  
19 a checklist. To say, "Okay, you said this.  
20 How did that go?" Simply that way.

21 And secondly, the non-regulatory  
22 piece of our proposal is we call on the entire

1 organic industry to help the Board by using  
2 available information before a product comes  
3 up.

4 Inerts, we know they are being re-  
5 reviewed by the EPA. If you have an inert in  
6 your formulation and you see the EPA has  
7 reviewed it and it's toxic or harmful to the  
8 environment, it's not going to be allowed.  
9 Therefore, get it out of your formulation  
10 before it comes to the Board. Bring the Board  
11 your new formulation so it informs your  
12 decision.

13 That can also be in 606.

14 There's lots of areas that  
15 proactive work by all of us in the community  
16 who have knowledge to be able to, and the  
17 manufacturers specifically, take the materials  
18 into hand and know what organic is. Then  
19 feeds into your ability to not have so much  
20 work to find out what those other alternatives  
21 are.

22 All that's in its infancy in terms

1 of a proposal to you. We're interested in  
2 your thoughts. Sorry.

3 MR. GIACOMINI: Jennifer.

4 MS. HALL: Thank you, Liana. I  
5 just wanted to update you and others in the  
6 community in case there are additional  
7 comments on the made-with-organic  
8 recommendation. That indeed we did take the  
9 feedback and what we will present is actually  
10 certified to USDA regulations, not guidelines.  
11 We agree that that was not meaningful, was not  
12 our intent.

13 So, if that is an item that other  
14 people are preparing to present, then they  
15 should know that and use their time more  
16 wisely.

17 MR. GIACOMINI: No further? Thank  
18 you.

19 MS. HOODE: Thanks.

20 MR. GIACOMINI: Will Fantle with a  
21 proxy. Grace Marroquin. Helen Kees with a  
22 proxy on two.

1                   MR. FANTLE: Thank you. My name  
2                   is Will Fantle. I'm the Co-Director of the  
3                   Cornucopia Institute, Wisconsin. Boy, welcome  
4                   to the Badger State. Happy that you could  
5                   come here with us.

6                   My proxy comes courtesy of Bill  
7                   Welsh, a former member of the NOSB and a Board  
8                   Member Emeritus of the Cornucopia Institute.  
9                   He's a livestock producer from Iowa.

10                  Leslie, I want you to know that  
11                  we've heard your request for a correction  
12                  about PCO's position on porches. I had heard  
13                  that before. I thought we had made that  
14                  changeover. We will make that change to  
15                  reflect that position of PCO.

16                  Miles, I am totally pleased that  
17                  we're still in the age of enforcement and I  
18                  was glad to hear your remarks this morning and  
19                  a portion of my comments are going to deal  
20                  with the enforcement issue concerning  
21                  accessory nutrients.

22                  The clarification that was issued

1 by the program in April, we think there needs  
2 to be a deadline, a hard and fast deadline,  
3 for the removal of accessory nutrients that  
4 are now deemed to be not appropriate for  
5 organics. Some of these, if not many of  
6 these, accessory nutrients are hexane  
7 extracted. We think that's a big red flag.

8 A clear statement could come from  
9 the NOSB saying vitamins and minerals are on  
10 the National List. I think that would help  
11 with some of this confusion that we've heard  
12 about.

13 And I also think that we had the  
14 opportunity for a petition process for the  
15 accessory nutrients. If they want to be  
16 added, that's available. If there aren't  
17 organic alternatives, let them make their  
18 case. Let them show that through the petition  
19 process. That's the route you should be going  
20 in.

21 Now, earlier this year, the Deputy  
22 Director at USDA talked about "We don't want

1 an industry that acted in good faith to be  
2 harmed." were her exact remarks in referring  
3 to the accessory nutrient decision that was  
4 made. We did some FOIA inquiries regarding  
5 this to see how this decision was reached and  
6 in the interest of helping with institutional  
7 memory at the NOSB, I'm going to share some of  
8 the things that we learned.

9 When these ingredients were first  
10 approached for use in infant formula, the  
11 manufacturers approached their certifier.  
12 Their certifier indicated that they would not  
13 meet the organic standards. The company  
14 reacted by lawyering up, getting a lobbyist  
15 and they then went and pressured the certifier  
16 again. A letter was issued from the National  
17 Organic Program saying they were not  
18 appropriate for use in organics.

19 That did not stop this company.  
20 They then went and had private meetings with  
21 the program director, with their lawyers and  
22 lobbyists and they reversed that certifier's

1 initial opinion on accessory nutrients.

2 These were not efforts in good  
3 faith. They were attempting to circumvent the  
4 organic law.

5 So, please I plead to the program,  
6 let's get hard and fast deadlines so that  
7 companies have some indication of when these  
8 products are no longer -- when these additives  
9 are no longer allowed in organic infant  
10 formula and other products.

11 It's especially troubling to us  
12 because we have a stack of FDA adverse  
13 reaction reports from infants that are  
14 needlessly harmed by some of these additives  
15 that seem to clear up and go away when they  
16 switch to a different formula.

17 A couple quick thoughts just on  
18 the labeling and organic advertising  
19 requirements that's in your packet: USDA seal  
20 is the gold standard. We need to protect  
21 that. We need to make sure that it's  
22 continually viewed by consumers as the gold



1 standard.

2 The attempt to increase the  
3 profile, raise the profile of the made with  
4 category as commendable as those efforts would  
5 be, maybe we just think are not something that  
6 should be done.

7 This is a good entry point for  
8 companies into organics and there may be some  
9 products in particular that it's not possible  
10 to make with 95 or 100 percent. It's a good  
11 entry point, a starting point and continues to  
12 provide encouragement for companies to seek  
13 commodity improvements to allow them to raise  
14 the bar themselves and that's what we want to  
15 see.

16 I buy made-with-organic products.  
17 I am happy they're out there and they exist,  
18 but I want to keep the gold standard higher  
19 than that and I would encourage the Board to  
20 try and keep the bar where it is and not lower  
21 it. We think that potentially increasing the  
22 profile of 70 percent or made-with will

1 discourage companies and perhaps discourage  
2 more farmers from moving organics.

3 That concludes my remarks. Thank  
4 you.

5 MR. GIACOMINI: Very well. Tracy.

6 MS. MIEDEMA: I have a question.  
7 Mr. Fantle, you reference a lowering of the  
8 bar and sort of circumventing the normal  
9 process. I wanted to ask you about your  
10 opinion of the 95 recommendation that first  
11 placed nutrients, vitamins and minerals.  
12 Because yes, this is something that our  
13 Committee really grappled with. It talks  
14 about accessory nutrients and even talks about  
15 omega-3 fatty acids, choline, et cetera.

16 So, rather than this idea of  
17 circumvention or bar is getting lowered, we  
18 went back to work 15 years ago that seemed to  
19 really -- that the spirit of that  
20 recommendation was more broad than something  
21 like 21 CFR 104.20(d)(3).

22 Help us understand how you

1 reconciled those differences.

2 MR. FANTLE: Well, I'm not sure  
3 that the Board's circumvented or the program  
4 did, but it was clear that the product  
5 manufacturer attempted, in our view, to get  
6 these products allowed.

7 Again, I would go back to what I  
8 said earlier. Just a clear statement that  
9 vitamins and minerals are on the list and then  
10 go from there and try and address other needs,  
11 other additives, accessory nutrients and use  
12 the petition process for that.

13 MR. GIACOMINI: Other questions?  
14 Okay. Thank you, Will.

15 MR. FANTLE: Thank you.

16 MR. GIACOMINI: Grace is next.  
17 Helen Kees on two. Michael -- depending on  
18 where he's coming from either Michael Roy or  
19 Michael --

20 MS. MARROQUIN: Good afternoon.  
21 My name is Grace Marroquin. I'm CEO and  
22 President of Marroquin Organic International,

1 a company based in Santa Cruz, California.

2 We've been importers and suppliers of organic  
3 ingredients since 1991.

4 I have addressed the Board almost  
5 every meeting since 2004 and once again, I'm  
6 here and please indulge me and hopefully, this  
7 will be the last time you hear me come up to  
8 this podium on this issue, but I will be back,  
9 I'm sure.

10 But, guess what I'm talking about  
11 today? Organic yeast.

12 I wish to commend the Handling  
13 Committee for this unanimous recommendation on  
14 organic yeast.

15 This is an adaptation to the  
16 National List stating that if organic yeast is  
17 available commercially, then organic yeast  
18 must be used in organic products for organic  
19 consumption. This will surely make organic  
20 foods more organic.

21 It would mean that a wide range of  
22 baked goods and other foods with the organic

1 label that the yeast will be organic rather  
2 than conventional. This is a positive step  
3 forward for the integrity of the organic  
4 label.

5 Because conventional yeast is made  
6 using synthetic chemicals, I must list these  
7 chemicals once again just in case there's any  
8 doubt in anybody's mind what needs to be done  
9 today. These chemicals are ammonia, sulfuric  
10 acid, caustic soda lye, synthetic vitamins and  
11 synthetic anti-foaming agents.

12 The wastewater from conventional  
13 yeast production is contaminated and must be  
14 disposed of. It must be treated before it's  
15 disposed of.

16 The organic yeast production used  
17 none of these chemicals and the wastewater is  
18 used in further organic reduction. I would  
19 drink it if it was offered to me, believe it  
20 or not.

21 Organic yeast in contrast uses a  
22 substrate of organic wheat and organic corn.

1 Organic yeast is produced in Germany today and  
2 it's the only company that's producing it at  
3 this time.

4 If we would have more demand for  
5 organic yeast, we could have it produced here  
6 in the United States. We would use organic  
7 grains produced by my Midwest organic farmers  
8 and I can assure you with total confidence  
9 that other yeast companies would start  
10 producing organic yeast. They've been  
11 watching this issue for years and just waiting  
12 to see what decisions will be made.

13 Organic yeast became available on  
14 the market in 2003. In 2004, the NOP ruled  
15 that in the final 5 percent manufacturers did  
16 not need to use organic yeast. The NOP said  
17 conventional yeast was allowed because it was  
18 on the National List on 205.605(a) and not on  
19 205.606.

20 Since 2004, long years, my company  
21 has been trying to have organic yeast required  
22 in the final 5 percent. This is where most

1 food products use their yeast. It's a minor  
2 ingredient for most of these companies.

3 We filed a formal petition back in  
4 2006 and now, we believe that this annotation  
5 corrects the problem. Manufacturers will at  
6 last be required to use organic yeast if it's  
7 commercially available rather than  
8 conventional yeast.

9 Last March, the NOP issued an  
10 important policy statement on yeast. It  
11 confirmed that yeast could be certified as  
12 organic under the NOP. However, the NOP  
13 policy did not change the status of yeast on  
14 the National List.

15 It is up to this Board to  
16 recommend any changes to the National List.  
17 Now, the Handling Committee has stepped up to  
18 plate by making this recommendation for  
19 annotation for organic yeast.

20 Meanwhile, the EU has also  
21 recognized organic yeast. In the EU, the  
22 general organic regulation 2007, there is a

1 key provision that the regulation would apply  
2 to yeast in food and feed and after 2013  
3 December 31st, in the EU, organic yeast will  
4 be counted as an organic ingredient with the  
5 EU fully embracing it.

6 And this is really important to  
7 have organic yeast recognized in the NOP so  
8 that the EU and NOP regulations will be in  
9 harmony and especially since we're working  
10 towards equivalency.

11 Today, I see the proposal before  
12 the Board to make organic yeast a preferred  
13 organic ingredient in processed foods as a  
14 milestone for the integrity of the organic  
15 label, and I know all the hard work that's  
16 gone into this over the years and especially  
17 by the Handling Committee who devoted a lot of  
18 time to this.

19 Thank you, Steve DeMuri, the Chair  
20 of the Committee. Joe Smillie who guided this  
21 recommendation and to all the Committee  
22 members. Katrina Heinze, Tracy, Jennifer and



1 Joe Dickson.

2 I also wish to thank the Board.  
3 Dan Giacomini for his work as the liaison with  
4 the Livestock Committee and all the group in  
5 the Material Working Committee who made the  
6 recommendations that helped with this  
7 guidance.

8 Thank you all and viva organic  
9 preference.

10 MR. GIACOMINI: Thank you.

11 Questions for Grace? Jeff.

12 MR. MOYER: Good morning, Grace.

13 MS. MARROQUIN: Good morning.

14 MR. MOYER: One question that just  
15 popped into mind as you were talking about  
16 other yeast manufacturers potentially coming  
17 on board and making organic yeast. Is there  
18 any part of the current process that is  
19 patented?

20 MS. MARROQUIN: Our supplier does  
21 have a patent on their process, but it's a  
22 process that none of these suppliers use that

1 type of process and what the EU has done is  
2 allow them to 2013 as the timing for them to  
3 get on board because they're confident that  
4 they can.

5 And I know of a domestic company  
6 presently that's working on this and it's  
7 really about using different substrates,  
8 nitrogen sources.

9 The biggest roadblock is more  
10 scale. Most of these yeast companies have  
11 phenomenally large scale. So, it's more  
12 difficult for them, but, you know, this  
13 industry has been all about -- it's a dynamic  
14 industry.

15 I've been in it almost 20 years  
16 and when there is a demand, the supply and the  
17 suppliers rise to this occasion and I know  
18 that they can do it and I've heard discussions  
19 just that they don't want to and they don't  
20 have to.

21 MR. MOYER: I guess I'm a little  
22 confused. As a follow up, you're saying that

1       they can and they would, but can they if the  
2       process is patented? Is it strictly -- you  
3       see where I'm going.

4                   MS. MARROQUIN: Yes, I do and --

5                   MR. MOYER: I just want to be  
6       careful that we don't want to steer something  
7       into -- I mean I don't mind somebody making  
8       money. I don't have a problem with that, but.

9                   MS. MARROQUIN: I think, you know,  
10      if they look at -- it's primarily their  
11      nitrogen sources and their substrates and then  
12      it's really about their scale.

13                   Our producer uses sunflower oil,  
14      organic sunflower oil, as an anti-foaming  
15      agent. There's nothing magical about that and  
16      then, you know, other parts of their process,  
17      but it's more of what I said is the issues I  
18      think and the scale is the big part of it.

19                   But, there is a company in  
20      Colombia that was looking at it for awhile and  
21      they said they could, but then they backed  
22      down three years ago.

1                   No one would have bothered, you  
2                   know, all these years. I'm crazy. I can't  
3                   help it.

4                   MR. GIACOMINI: John.

5                   MR. FOSTER: Jeff, my  
6                   understanding is that that process is  
7                   patented, but that would not inhibit other  
8                   processes from producing organic yeast. Yes.

9                   MS. MARROQUIN: Thank you, John.  
10                  I appreciate that.

11                  MR. GIACOMINI: Any other  
12                  questions or comments? Okay. I think that's  
13                  it. Thanks, Grace.

14                  MS. MARROQUIN: Thank you,  
15                  everybody.

16                  MR. GIACOMINI: Helen Kees.  
17                  Michael on one and Guy Jodarski next up on  
18                  two. We have a change? I'm sorry. I'm  
19                  looking on an old list. So, who would --  
20                  what's our change? Oh, Andrew Schwartz.  
21                  Okay. All right.

22                  MS. KEES: Welcome to my home

1 state and thank you for bringing the hearings  
2 on the road.

3 I am Helen Kees. I farm in Pepin  
4 County, Wisconsin where I was born and raised.

5 Please accept my sincere  
6 appreciation for your role in keeper of the  
7 organic seal, and keep it we must.

8 As a certified organic crop and  
9 livestock farmer, I proudly serve as a member  
10 of the Cornucopia Institute Board of Directors  
11 because it is dedicated to economic justice  
12 for family-scale organic farmers.

13 Through advocacy and education,  
14 Cornucopia retrieves and restores the  
15 integrity of the organic seal whenever it is  
16 stolen, hijacked, or compromised.  
17 Cornucopia puts the varnish back on the seal  
18 when it is tarnished. They reclaim it when it  
19 is being used as stolen property and they  
20 defend its integrity when it is being  
21 undermined.

22 Today, I have the distinct honor

1 of giving voice to people that could not be  
2 here. At this time, if you would, I would  
3 like to officially present nearly 1500 proxy  
4 testimonies. Many of them from organic egg  
5 producers.

6 Confinement and outdoor access  
7 issues regarding poultry can be framed by the  
8 following. First, enough of us have been at  
9 concerts or stadiums to know that rather than  
10 wedge and shoulder our way past thousands of  
11 people to seek relief for our bladder or to  
12 fetch an organic hot dog, you simply choose to  
13 languish in your seat rather than fight for  
14 comfort.

15 Likewise henhouses with thousands  
16 and ten of thousands of birds packed indoors  
17 with only a few small pop doors to the  
18 outside, perhaps only on one side of the  
19 building, rob the animals of the opportunity  
20 to access the outdoors.

21 And, secondly, I have a four-year-  
22 old grandson. I sometimes tell him, "Robert,

1       you have to get dressed before you can go  
2       outdoors." Then when he fulfills his end of  
3       the deal, I tell him that he can only go as  
4       far as the porch. He stands there dismayed.  
5       Even a four year old recognizes circumvention,  
6       scamming and deception.

7               This Board's recommendation in  
8       2002 acknowledged that porches did not fulfill  
9       the outdoor access requirement and NOP should  
10      adopt your porch prohibition forthwith.

11              Now, more specifically, in the  
12      direct words of the proxy signatories.

13              For the consumer, Terry Cannon,  
14      Los Angeles, California: "This harassment of  
15      organic food producers has got to stop. This  
16      deception by big egg business has to stop."

17              Terry Miller from Legrange,  
18      Indiana: "We are certified organic dairy  
19      farmers. If rules on pasture are not  
20      enforced, poultry and dairy, consumer  
21      confidence will be damaged if not ruined."

22              From Scottsdale, Arizona,

1 Elizabeth Paulcini: "Consumers like me put a  
2 lot of faith in the USDA organic label and it  
3 is shocking to find out that so many egg and  
4 milk producers are not living up to these  
5 standards."

6 And from Dundee, Ohio, Jeff Miller:  
7 "What a disgrace to the spirit of organics."

8 A farmer Jacob Beachey from Spring  
9 Run, Pennsylvania: "We support the small  
10 family farmers here in America and still  
11 believe in our old logo that says 'In God We  
12 Trust'. We also hope that consumers can trust  
13 in the products they buy at the stores or  
14 farmer's markets."

15 Rebecca Cleveland from Green Bay  
16 here in Wisconsin: "I feel the current use of  
17 organic labeled eggs constitutes false  
18 advertising and down right consumer fraud."

19 From Brookshire, New York, farmer  
20 Michael Vos: "Please enforce the current  
21 regulations and provide formal clarification  
22 that outside access for all poultry including



1 broilers, pullet and layer production."

2 An inspector from Salem,  
3 Massachusetts, Duncan Cox: "Most farms I  
4 visit have flocks on pasture. Many do not  
5 bother to certify their certifiable flocks  
6 because they cannot compete with low-priced  
7 organic eggs in the grocery store."

8 And from Fairchild, Wisconsin,  
9 farmer Neal Gingrich: "If these factory farms  
10 are allowed to continue, organic will soon be  
11 just another word on the egg cartons or milk  
12 jugs."

13 C. G. Mauricee from Sarasota,  
14 Florida, consumer: "It is absolutely  
15 abhorrent that agribusiness is allowed to  
16 engage in such blatantly deceptive practices."

17 And Eric Nicklestead from Seattle,  
18 Washington: "When I buy food labeled as  
19 organic, I expect it to be organic. The job  
20 of the NOSB is to assure that organically-  
21 labeled food is truly organic."

22 Deborah Raven-Lindley from

1 Arbuckle, California: "For myself and farmers  
2 who chose an economically tenuous model of egg  
3 production, our motivation is the behavioral  
4 welfare of our poultry first, profit second.  
5 This is the opposite of forces which drive  
6 most U.S. agribusiness."

7 And from Abram Stolzfooz from  
8 Black River Falls, Wisconsin: "I'm involved  
9 with marketing organic produce and eggs and  
10 have contact with several marketing groups in  
11 Wisconsin and personally know a lot of organic  
12 farmers. I feel confident that it would not  
13 take long for organic farmers to fill in the  
14 void should the USDA shut down the factory  
15 farms."

16 And finally, but succinctly, a  
17 consumer from Mankato, Minnesota, Janice Fox  
18 says "Please stop this."

19 MR. GIACOMINI: Any comments or  
20 questions? Okay. Seeing none. Thank you  
21 very much.

22 Next up is Michael -- well, I

1 better go up here. Michael. Michael?

2 MR. ROY: Yes.

3 MR. GIACOMINI: And then Andrew  
4 and Dave Carter. Is Andrew here? Okay.  
5 Hopefully. Oh, you're saying he's in the  
6 back? Oh. Okay. Andrew and then Dave  
7 Carter. Okay. Go ahead.

8 MR. ROY: My name is Michael Roy.  
9 Roy by the way.

10 MR. GIACOMINI: Roy. Okay.

11 MR. ROY: My parents' heritage  
12 stinks. I'm a fourth-generation hop grower in  
13 the Yakima Valley and I'm also a Board Member  
14 of the AOHGA.

15 I'd like to briefly go over some  
16 supply and demand numbers with you real quick.

17 So, to start off, I believe  
18 organic hop producers currently have the  
19 capacity to deliver the quantity of organic  
20 hops brewers require.

21 So, I think everyone has that  
22 sheet. Yes, that one right there. Yes. It

1 says supply and demand analysis of organic hop  
2 industry at the top.

3 If you look at the first line  
4 there, in 2009, the dollar value of the U.S.  
5 organic beer industry was \$41 million. If you  
6 look at the total craft beer industry in 2009,  
7 that was \$6.98 billion. Which means that the  
8 U.S. organic beer industry represents about 6  
9 percent, .59 percent of the U.S. craft beer  
10 industry.

11 If you go down to the next line,  
12 the U.S. craft brewers sold an estimated -- a  
13 little over 9 million barrels of beer in 2009.

14 If you take the craft industry  
15 average of one pound of hops per barrel, that  
16 gives you the same amount. Just over 9  
17 million pounds of hops used in the craft  
18 industry in 2009.

19 Go on to the next line, if we take  
20 that just over 9 million pounds of hops used  
21 in the craft beer industry and we multiple it  
22 by .59 percent, you come up with an estimated

1 demand currently of 53,545 pounds of hops.

2 That's what we estimate the demand  
3 currently is. Now, obviously, that number is  
4 going to be hard to exact because data is  
5 limited, but we've come up with the  
6 conservative estimate that we believe to be  
7 fairly accurate.

8 Now, if you look at the number of  
9 certified acres in the ground right now, it's  
10 just over 100 acres. In 2010, the production  
11 off those 100-plus acres exceeded 80,000  
12 pounds of hops. So, we're looking at  
13 potential demand of just over 53,000 with the  
14 production of 80,000 right now.

15 Now, talk about future demand,  
16 based off of the amount of land that's sitting  
17 right now capable of being certified, we could  
18 easily double that number and go over 200  
19 acres of certified land right now today. If  
20 we talk about the next two years, we could  
21 triple that.

22 Now, there is some varietal

1 alignment that needs to happen in there, but  
2 that's not going to happen without a dialogue  
3 between the brewers, merchants, and growers.

4 So, and I also think it's  
5 interesting to note that if you take the total  
6 number of growers in the United States, over  
7 10 percent of those growers are currently  
8 growing organic hops and if you take 10  
9 percent of the growers, they represent 20  
10 percent of the acres being grown in the United  
11 States.

12 The ability is there. The  
13 capacity is there and basically in conclusion,  
14 organic hop producers currently have the  
15 capacity to deliver the quantity of organic  
16 hops the brewers require.

17 I'd just like to thank you guys  
18 for allowing me the opportunity to speak.

19 MR. GIACOMINI: Joe.

20 MR. SMILLIE: So, you weren't  
21 saying -- it says here 53,545 pounds of hops  
22 were used by the U.S. organic breweries.

1 MR. ROY: No, that's what we  
2 estimate the current demand is.

3 MR. SMILLIE: That's the demand.

4 MR. ROY: Yes.

5 MR. SMILLIE: Yes. It says were  
6 used.

7 MR. ROY: There's --

8 MR. SMILLIE: Should be.

9 MR. ROY: Should be. Should be.

10 MR. SMILLIE: Should be used.

11 MR. ROY: Yes. As I think Jason  
12 spoke, out of those 80,000 pounds of hops  
13 produced in 2010 --

14 MR. SMILLIE: Oh, you're right.

15 MR. ROY: -- the majority if not  
16 all of them are sitting in inventory right  
17 now.

18 MR. SMILLIE: Right.

19 MR. GIACOMINI: John.

20 MR. FOSTER: This is really  
21 helpful to have numbers like this and I'm  
22 sorry for not twisting around to --

1 MR. ROY: That's okay.

2 MR. FOSTER: -- say hi. In your,  
3 you know, inquiries, how many of these growers  
4 have their own hops processing equipment?  
5 What percentage give or take?

6 MR. ROY: If you mean processing  
7 equipment means --

8 MR. FOSTER: Yes, taking cones off  
9 of vines.

10 MR. ROY: Oh, well, of the -- I  
11 would say probably over 95 percent of the  
12 organically produced hops or 95 percent of  
13 those growers have their own processing  
14 equipment.

15 There's a small amount that we  
16 incorporate into that figure based off the  
17 small amounts of organic hops being produced  
18 around the United States. The majority of the  
19 production I talk about is on the West Coast  
20 specifically in the Pacific Northwest, but  
21 there are small parts around the country and  
22 some of those people might not have their own



1 processing equipment.

2 So, I would say it's probably even  
3 closer. It's probably like 98/99 percent of  
4 that amount people have their own processing  
5 equipment.

6 MR. FOSTER: And among those who  
7 have their processing equipment, just  
8 ballpark, how many are exclusively organic  
9 handling operations?

10 MR. ROY: Very --

11 MR. FOSTER: Ballpark.

12 MR. ROY: -- very small  
13 percentage. Oh, ballpark. I'm going to take  
14 a wild guess and say maybe 1 percent.

15 MR. FOSTER: Okay. Varies.

16 MR. ROY: Yes.

17 MR. FOSTER: Okay. So, would it  
18 be fair to say that most of the processing  
19 equipment used to get the cones off of vines,  
20 et cetera are mixed operations?

21 MR. ROY: Yes.

22 MR. FOSTER: Okay. That's great.

1 Thank you.

2 MR. GIACOMINI: Questions? Joe.

3 MR. SMILLIE: You're certified by  
4 WSDA?

5 MR. ROY: Yes. Correct.

6 MR. GIACOMINI: Questions?  
7 Comments? Okay. Thank you, Michael.

8 MR. SCHWARTZ: All right. Thank  
9 you very much.

10 MR. GIACOMINI: Andrew. Dave  
11 Carter. Patrick Smith. Oh, we're up for  
12 lunch. Okay. The last one before lunch.  
13 Then we'll start with -- Dave, we'll start  
14 with you after lunch. Okay.

15 MR. CARTER: Great.

16 MR. GIACOMINI: All right. All  
17 right.

18 MR. SCHWARTZ: Okay. My name is  
19 Andrew Schwartz. I live up here in Ontario,  
20 Wisconsin and as you will probably shortly  
21 recognize that I am a farmer not a speaker,  
22 but I will try to do my best.

1                   We farm about -- we've got a farm  
2                   of 147 acres, but we farm about 80 acres of  
3                   cropland and we do farm all organic and we do  
4                   have a flock of 2,000 laying hens right now  
5                   and we also milk cows. Everything is organic  
6                   and we raised a big family. We were into hogs  
7                   and the hogs took the course like everything  
8                   else. The factory farms took over.

9                   So, there was nothing left for the  
10                  small farmer in hogs. So we converted our hog  
11                  barn over to chickens. We've got a bottom  
12                  story and a top story, but they all have  
13                  access to outside access, outside lot. I  
14                  think like 15 to 20-square feet per bird and  
15                  I think this is very important because I see  
16                  in the wintertime when it's not feasible to  
17                  put them out that they are more restless and  
18                  there will be more feather picking and more  
19                  fighting.

20                  So, and I think we are into this  
21                  for a living. Our way of life is on the farm.  
22                  Our way of making of living is on the farm and

1 I think -- as long as we let these big factory  
2 farms like Neal Gingrich stated, take the main  
3 run, I think we will not have a market for our  
4 future generations that we can make a living  
5 on.

6 I remember back in the '60s my  
7 folks had 300 to 400 laying hens. We sold  
8 eggs on the market, but when the eggs dropped  
9 to 30 cents a dozen, there was just no way  
10 that we could compete.

11 So, I think that is an important  
12 issue that you can pasture or at least have  
13 access to the outdoors. I can go up to the  
14 door at certain appointed time when it's time  
15 to turn them out. They will be there ready to  
16 go. So, they can't tell me that a chicken  
17 does not want to go outside.

18 Just like our children. They want  
19 to go outside no matter how cold it is. They  
20 still like the outdoors.

21 Another thing that I think is  
22 important is that we have -- we are a little

1 more I would say sustainable where we can  
2 raise our crops. It's not just a building  
3 here setting in the middle nowhere that has  
4 all around it commercial or I would say  
5 chemical fertilizers right up to the door, you  
6 know, with a big building setting there that's  
7 suppose to be organic.

8           And I think another thing is that  
9 we can use our own manure so to speak. That  
10 we have -- where do these houses go that have  
11 all these thousands of birds. They have to  
12 distribute that manure somewhere. That way we  
13 can use it as our own fertilizer.

14           So, and then I know there's a lot  
15 of friction in this organic business, but  
16 honesty is still a lot of it. I believe in  
17 what the Bible says. If we are not honest in  
18 little things, we will not be honest in big  
19 things. So, to bend the rules I don't think  
20 is very proper.

21           And it's getting to the point --  
22 we started certified organic in 2002. Back

1       then, there wasn't that much paperwork. It  
2       was pretty simple, but now, it's getting to  
3       the point, can we keep doing it? Or do we  
4       need a college education to fill out these  
5       papers.

6                   Just for instance like this dairy  
7       thing. This 30 percent pasture. Well, we are  
8       way beyond that. I mean we're probably more  
9       like 70 percent, but I realize that it has to  
10      show on paper and we have to know the dry  
11      matter intake.

12                   So, it's getting more and more  
13      complicated because there are so many people  
14      out there trying to bend the rules to suit  
15      them the way it looks to me.

16                   MR. GIACOMINI: Okay. Your time's  
17      up. Can you wrap up or --

18                   MR. SCHWARTZ: Sure can.

19                   MR. GIACOMINI: Oh, you're  
20      finished? Okay. Questions or comments?  
21      Katrina and then Wendy.

22                   MS. HEINZE: I will apologize as

1 well for not turning around. Thank you so  
2 much for coming to talk to us today. Your  
3 comments are very much appreciated.

4 I'm wondering. Could you help me  
5 --

6 MR. GIACOMINI: Wait. We have a  
7 question for you. We're going to have -- we  
8 have questions.

9 MS. HEINZE: Oh. Sorry. You  
10 know, probably anxious to be done. I have an  
11 easy question, I promise. I need help with  
12 a visual picture for my head.

13 If I picture your henhouse, how  
14 big is the door?

15 MR. SCHWARTZ: The bottom door is  
16 like 6 feet tall and 8 feet wide where we  
17 drive through to clean it out.

18 The top one actually couldn't be  
19 as big because -- it's like 4 feet wide and 4  
20 feet tall and they have to go down.

21 It's on a hillside. So, there's a  
22 ramp that just goes kind of down a little and

1 out on the hill there. So.

2 MS. HEINZE: Thank you.

3 MR. GIACOMINI: Wendy. Wait.

4 Yes. Yes, he's trying to sneak away.

5 MS. FULWIDER: How many birds do  
6 you have in your house and do you have perches  
7 in your house?

8 MR. SCHWARTZ: We don't currently  
9 what you would call "perches". We have roosts  
10 where they sit on. We have 2,000 birds and  
11 the nests go through the center with it built  
12 in it and then there's 6 foot of roots right  
13 next to the nests and that's where the water  
14 line is on, the feeders are on. We also feed  
15 them on the floor in boxes. So.

16 MR. GIACOMINI: Kevin.

17 MR. ENGELBERT: Thank you very  
18 much for the time it's taken you to come and  
19 speak.

20 How many birds do you think you  
21 could have? You have 2,000 now. Could you  
22 expand your production at all or where do you



1 think -- what level would your farm be  
2 comfortable at?

3 MR. SCHWARTZ: Right now, we put  
4 these birds in the 21st of August. I suppose  
5 they're right at their peak. I checked it  
6 yesterday. There was like 96/97 percent.

7 MR. ENGELBERT: Could you raise  
8 more than 2,000 birds?

9 MR. SCHWARTZ: Usually, my  
10 building is designed for 2400, but when the  
11 pullets came, he was short this year. I guess  
12 our maximum is 2500.

13 That's -- we just -- and I forgot  
14 to mention that we are -- maybe I shouldn't  
15 even say this, but we are certified as a group  
16 and I am the group coordinator for the -- we  
17 call the CCOP, Cashton Community Organic  
18 Producers and I think right now there is 14  
19 members in our group and the reason we think  
20 we can get by with this is because we farm in  
21 similarity and there's six of those that are  
22 egg producers.

1 MR. GIACOMINI: Okay. Thank you.

2 Any other questions or statements?

3 I want to thank you because you  
4 gave me an "Aha" moment with your comments  
5 when you said that your kids want to go  
6 outside and you can't keep them in. When my  
7 kids are on their assigned time where they're  
8 allowed video games, I can't get them out of  
9 the house. So, maybe the problem we have is  
10 too many of the conventional poultry are on  
11 video games. So, we're going to have to look  
12 into that. Kind of we need to restrict the  
13 amount.

14 So, thank you.

15 We're up for lunch. Let's be back  
16 at -- 12:40. Can we do a little shorter than  
17 an hour and look at 1:30? Okay. That's what  
18 we'll do.

19 We're on recess.

20 (Whereupon, the above-entitled  
21 matter went off the record at 12:39 p.m., and  
22 resumed at 1:43 p.m.)



1 version of the list, where we're just going to  
2 have each person in order, and we'll just go  
3 back and forth between the podiums.

4 So, hopefully, we'll stay  
5 expedited, but it won't get too confusing.  
6 Dave Carter?

7 MR. CARTER: All right, thank you,  
8 Mr. Chairman, Members of the Board. I'm Dave  
9 Carter. I wear several hats, Executive  
10 Director of the National Bison Association,  
11 itinerant consultant and expatriate of this  
12 group.

13 I want to thank the existing Board  
14 Members for your service, the ones going off.  
15 There is light after NOSB. So, enjoy these  
16 last few meetings.

17 I'm here actually today  
18 representing the Pet Food Institute and the  
19 organic pet food manufacturers. I have two  
20 parts, here. A little bit later, I'll be a  
21 proxy for Nancy Cook, with the PFI.

22 So, the first segment here, I

1 really want to provide an overview of the  
2 issues, and then the sequel will be some  
3 recommendations, or a specific recommendation  
4 that we have.

5 But just to kind of put things  
6 into context, and why the pet food issue is so  
7 critical and it needs to be addressed as a  
8 priority, and the rule making needs to get  
9 underway as soon as possible, is this isn't a  
10 theoretical discussion.

11 The organic pet food category is  
12 about a \$260 million category, according to  
13 PFI and I think, some other independent  
14 studies are backing that up, and it's really  
15 amazing that it's that large, because for the  
16 last eight years, certified organic pet food  
17 has really been a square peg that we've been  
18 trying to cram into a round hole, in terms of  
19 the certification.

20 It started off in 2002, with  
21 certifiers working, or manufacturer's working  
22 with certifiers coming forward, with certified

1 organic pet food, and of course, then in April  
2 2004, there was the infamous directive, saying  
3 that pet food could no longer be certified as  
4 organic, and then there was the outcry and the  
5 reversal of the directive saying, well, yes,  
6 it could be certified as organic, as long as  
7 it was certified under 205.605, the human food  
8 standards, not livestock.

9 And of course, realizing that that  
10 was the square peg in the round hole, that was  
11 what led to organizing the pet food task  
12 force, and the recommendations that this group  
13 adopted in November 2008, that were anxiously  
14 awaiting to become official rule making.

15 But the -- what has happened since  
16 that 2004, "Yes, you can certify under  
17 205.605," was that certifiers then began to  
18 work with the manufacturers in how to develop  
19 the pet food under complete and balanced, and  
20 because of the interpretation that the NOP  
21 allowed under 104.20, the accessory, vitamins  
22 and nutrients that sub-section F allowed them

1 to bring in some of these nutrients into the  
2 complete and balanced pet food.

3 Well, with the announcement  
4 earlier this year about the tighter  
5 enforcement of that and the transition, then,  
6 we're in a serious situation.

7 We've been working with OTA, as  
8 they've tried to address this, but we also  
9 need to recognize that there's some individual  
10 issues for pet food. Specifically, these are  
11 not accessory nutrients, when it comes to  
12 companion animals. These are required  
13 nutrients for pets.

14 And the second thing is that in  
15 terms of human food, if we don't get our  
16 nutrients out of a certified organic product,  
17 I'm going to be eating lots of other stuff,  
18 the rest of the day, and I will be getting  
19 those nutrients from other sources. In fact,  
20 some people would say I get too many nutrients  
21 from other sources.

22 But that pet -- we have once a day

1 to get it right. That bowl that we put out,  
2 once or twice a day, is their soul source of  
3 nutrition, and so, that's why it's very  
4 important that it be complete and balanced.  
5 That's the terminology that AAFCO uses, to say  
6 that it has all of the vitamins, minerals and  
7 nutrients that that animal needs for  
8 maintenance or growth.

9 And of course, when it comes to  
10 that, we often refer to AAFCO as the Bible,  
11 the Association of American Feed Control  
12 Officials, as the Bible, for what's to be  
13 required.

14 Well, AAFCO may be the Bible, but  
15 the actual stone tablets are the National  
16 Academies of Science, that National Research  
17 Council, and that's what Congress and the  
18 government relies on, and so, I want to talk  
19 about that, in my second half, of a  
20 recommendation that we have, because as we  
21 look forward, going forward, there are about  
22 13 nutrients that pets need, that we will have



1 to petition.

2 We've already submitted a petition  
3 for taurine, but there are 12 other nutrients  
4 that we will have to petition individually,  
5 unless we can address this.

6 So, we want to talk about that.  
7 Hang on, the sequel is coming back with how we  
8 would propose to address this, going forward,  
9 as Miles begins the rule making for organic  
10 pet food regulations.

11 MR. GIACOMINI: Comments or  
12 questions for Dave?

13 MR. ENGELBERT: Could you expand on  
14 your bison member path and reiterate your --  
15 the concern about --

16 PARTICIPANT: We can't hear you.

17 MR. ENGELBERT: Could you put on  
18 your membership in the Bison Association, and  
19 reiterate your comments about the impact of  
20 the proposed Animal Welfare Standards?

21 MR. CARTER: Absolutely, I  
22 appreciate that, yes.

1                   We did submit written comments  
2                   from the National Bison Association on the  
3                   handling and transportation. We appreciate  
4                   that the NOSB is addressing this issue, but  
5                   what's also important to recognize, the bison  
6                   are a little bit unique, and one of the areas  
7                   that we think is very important to recognize  
8                   is that we would encourage that bison be  
9                   exempt from any requirements that stunners be  
10                  used in the slaughter process.

11                  Stunning is not used in the  
12                  slaughter of bison. It generally just pisses  
13                  them off, and that -- I mean, literally,  
14                  because of their skull structure, we don't do  
15                  that.

16                  And so, there are procedures for  
17                  using a single shot that has been developed on  
18                  third party audits and are accepted by Whole  
19                  Foods and the other retailers that we want to  
20                  see.

21                  And you know, even in terms of  
22                  other livestock, I would say that you need to

1 take a look at that because there is the  
2 emergence of things like the mobile slaughter  
3 plants, when what you're putting out into the  
4 pasture, and there are some ways to harvest  
5 other animals, without studying them, that you  
6 can drop them very quickly. There is no  
7 stress involved. It's as humane as you can be  
8 when you're slaughtering an animal.

9 MS. FULWIDER: I believe in this  
10 write-up that we had for the slaughter and  
11 transport handling, that it does say `stunning  
12 by captive bolt or fire arm'.

13 MR. CARTER: Okay.

14 MS. FULWIDER: So, that would be  
15 fine.

16 MR. CARTER: Okay, thanks.

17 MR. GIACOMINI: Joe?

18 MR. SMILLIE: I just wanted to ask,  
19 the program, Miles, how do you place pet food  
20 in your priority list, or how are we doing?

21 MR. McEVOY: Okay, origin of  
22 livestock, well, pesticide residue testing is

1 the first one we're taking on, and then origin  
2 of livestock is a very high priority for next  
3 year.

4 After that, there is pet food,  
5 mushrooms, apiculture, that kind of all fall  
6 together, and we're hoping to make some  
7 progress next year, on all of those.

8 MR. GIACOMINI: Also, sort of to  
9 Miles, and the same thing, is there a way,  
10 maybe within this process that we have of the  
11 NOP response, where we can either get an idea,  
12 the Board can get an idea of where you're  
13 coming from, or where you're going, or maybe  
14 an interaction between the Board and the  
15 program, in the situations of the aquaculture,  
16 the pet food?

17 I know in aquaculture, we  
18 requested a separate set of lists, a separate  
19 list for aquaculture on the sections on the  
20 National List.

21 You know, right now, we're looking  
22 at 605. I know as an animal nutritionist, the

1 concept of the nutrients required for pet  
2 food, I have nothing against the handling  
3 committee, but the fact that that's reviewed  
4 by the handling committee is just bewildering  
5 -- would be bewildering to me.

6 So, whether you look to do that in  
7 separate sections, whether you look to -- just  
8 how you look to proceed, I think, maybe some  
9 dialogue between the Board and the program  
10 would be productive.

11 MR. McEVOY: Yes, dialogue between  
12 the Board and the program sounds great. As we  
13 move into developing the proposed rule in  
14 these areas, we can ceratin continue to have  
15 dialogue, ask for clarification from the  
16 Board, of what the intent of your  
17 recommendations on these issues were.

18 So, there can be a lot of  
19 dialogue, during that process.

20 MR. GIACOMINI: Further questions  
21 or comments? Seeing none, thank you.

22 MR. CARTER: Okay, thanks.

1 MR. GIACOMINI: Okay. We are up to  
2 -- I thinks she's -- we're back up on the same  
3 list. Patrick Smith, Harriet Behar and  
4 Patrick Leavy.

5 MR. SMITH: Good afternoon. My name  
6 is Patrick Smith. I'm a fourth generation of  
7 hop growers in the Yakima Valley of Washington  
8 State and the Vice President of the American  
9 Organic Hop Growers Association.

10 Like my colleagues who spoke  
11 earlier, until the petition was filed with the  
12 NOSB, our farm men had had little or no  
13 contact with organic brewers, regarding the  
14 organic hops we were producing.

15 606 may work for other products,  
16 but hops are pretty unique. They have one  
17 commercially viable use, and that's in the  
18 production of beer, as less than five percent  
19 of that end product.

20 So, whereas like carrots, where  
21 purple carrot juice might be on the list, that  
22 doesn't prohibit the production, organically,

1 of carrots. Whereas with hops, when it's on  
2 the list, all organic production is kind of  
3 discouraged.

4 So, I'm going to take some time  
5 and just kind of talk about the mechanics of  
6 the conventional hop market, and how that  
7 relates to the handling committee's  
8 recommendation.

9 In both the craft market and the  
10 generic alpha market, contracting is the norm.  
11 In the craft market, per the Brewer's  
12 Association, which is a trade group of craft  
13 brewers, 99.1 percent of craft beer produced  
14 in the United States is brewed by brewers who  
15 engage in some form of hop contracting.

16 For the largest and most  
17 sophisticated brewers, average contract length  
18 is 3.9 years, and those can sometimes go out  
19 to 10 years.

20 The demand for hops is very  
21 inelastic. Prices fall. Brewers don't go out  
22 and buy more hops. They only buy what they

1        need. So, producing hops for the spot market  
2        is very uneconomical. It's just -- it  
3        actually doesn't happen. The cost of growing  
4        hops is substantial.

5                    Conventional hop production costs  
6        about \$5,000 an acre. Organic hop production  
7        can cost \$7,000 to \$10,000 an acre. So, the  
8        risks of growing organic hops for the spot  
9        market are huge.

10                   So, the reasons for engaging in  
11        the contracting on the growers side is the  
12        high cost of establishment and production,  
13        having a secure outlet for those hops.

14                   For brewers, it's assurance and  
15        availability of their preferred varieties.  
16        You know, right now, in the organic hop  
17        market, it's mostly all spot. Like we  
18        mentioned, there is no contracts for organic  
19        hops currently. Little information from  
20        brewers about what varieties are demanded, and  
21        the result is that, like some of my colleagues  
22        stated, multiple years of production sitting



1 in inventory, right now, with no defined  
2 outlet for them.

3 We've got access to certified  
4 acreage. I've got 17 acres certified on my  
5 farm, only about 10 in production, because the  
6 demand isn't great enough to warrant planting  
7 another seven. So, it just -- right now, the  
8 market is broken.

9 Let's see, yet, in the comments  
10 received from some of the brewers, we see that  
11 they're still making this commercial  
12 availability argument, and it's simply not  
13 true.

14 With over 150 different varieties  
15 of hops, the way that the commercial  
16 availability standard applies to us is that  
17 we're expected to guess which varieties they  
18 want, and then guess the quantities and  
19 produce it for them, and if we get it wrong,  
20 we have no way to sell it, and then they can  
21 just go use non-organic. So, it just doesn't  
22 work.

1                   But the handling committee's  
2                   revised recommendation is a prudent and  
3                   responsible way to get from where we are today  
4                   to a point where organic beer is using organic  
5                   hops.

6                   You know, no variety is immune  
7                   from the laws of supply and demand. If  
8                   brewers tell us, "We want it," we'll plant it  
9                   and we'll grow it, in an organic fashion, and  
10                  can do it, you know, within that two year time  
11                  line.

12                  So, if passed, the January 1, 2013  
13                  date allows two full crop years for these  
14                  discussions to happen.

15                  So, the question came up earlier  
16                  about why the six months from the sunset to  
17                  the January 1st date and -- it just allows  
18                  that extra crop year. If brewers had to start  
19                  using it in June 2012, which is the sunset  
20                  date, that would allow us only the 2011 crop  
21                  to do it.

22                  So, it was kind of a compromise of

1        sorts, to get to, you know, two full crop  
2        years to get the production in line with what  
3        the brewers demand, and get some time for  
4        those discussions to happen. I'll take your  
5        questions.

6                    MR. GIACOMINI: I will go first,  
7        this time. But the -- okay, Joe, the deadline  
8        is what date?

9                    MR. SMILLIE: January 1, 2013.

10                   MR. GIACOMINI: Okay, January 1,  
11        2013, that means on January 2, 2013, you can't  
12        use that previous crop year anymore. That's  
13        my confusion on this date that's being set.

14                   If you want to use the -- that  
15        product for the entire crop year, you need it  
16        until the next August, isn't that right?

17                   MR. SMITH: The way that I  
18        understood the handling committee's  
19        recommendation and the way that we had kind of  
20        crafted it in some discussions with some  
21        brewers about kind of how to get to this 2013  
22        date, was that any beer brewed before January

1 1, 2013 would -- they could use non-organic  
2 hops.

3 On January 1, 2013 and after, any  
4 beer brewed had to use organically --

5 MR. GIACOMINI: Correct.

6 MR. SMITH: -- grown hops. So,  
7 hops being durable, we can grow them in 2011  
8 and 2012, and then for their use, January 1,  
9 2013, and later.

10 MR. GIACOMINI: But if you're  
11 saying that you need it that crop year, in  
12 non-organic form for your transitions, you're  
13 only going to be able to use it until that  
14 January date.

15 MR. SMILLIE: Now, we're talking  
16 about a brewer's transition, not their organic  
17 farm transition. They're organic.

18 MR. GIACOMINI: That's correct.

19 MR. SMITH: And we're already  
20 certified. So, it's up to the certifiers of  
21 the brewers, to say, you know, kind of, "On  
22 January 1, 2013, the hops that you're using

1 and any beer brewed on that date or later,  
2 must use organic hops."

3 MR. GIACOMINI: Okay, I'm just  
4 confused. I just don't understand -- okay,  
5 we'll talk about that tomorrow. Anymore  
6 questions? Joe?

7 MR. SMILLIE: Yes, just to clarify,  
8 again, and I know I'm sounding like a broken  
9 record, but you can only use conventional hops  
10 if you can prove to your certification agent  
11 that the organic varieties that you need are  
12 not available.

13 MR. GIACOMINI: Okay.

14 MR. SMILLIE: And I keep stressing  
15 that, because that is absolutely part of 606.  
16 That's got to be enforced and followed, and  
17 again, we just sort of leap over that.

18 Also, thank you about the  
19 compromise. A lot of it was due to your blog,  
20 Patrick, in particular. The first half of the  
21 blog was a little nasty and the second half  
22 was really good, because we never told the hop

1 growers to drop dead, honestly. I don't  
2 recall that phrase being uttered in our  
3 conversations, at all.

4 I've got a question, though. You  
5 said that -- back to 99.1 percent of brewers  
6 contract hops in advance.

7 MR. SMITH: The Brewer's  
8 Association data -- the Brewer's Association  
9 is --

10 MR. SMILLIE: Is this craft  
11 brewers?

12 MR. SMITH: Craft brewers, yes.

13 MR. SMILLIE: Craft brewers?

14 MR. SMITH: Less than two-million  
15 barrels of annual production, you fall under  
16 the craft brewery.

17 MR. SMILLIE: Right.

18 MR. SMITH: So, the Brewer's  
19 Association trade group, you know, collects  
20 data on hop usage and hop contracting, in  
21 response to some of the market imbalances of  
22 the last five years, and they compiled this

1 data about contracting and found that of the  
2 nine-million barrels of craft beer produced,  
3 99.1 percent of that nine-million was brewed  
4 by brewers who engage in some form of hop  
5 contracting.

6 MR. SMILLIE: Well, my  
7 understanding was that a lot of times, the  
8 brewers don't go to the hops -- this was a  
9 discovery for us -- the brewers don't go to  
10 the hop growers. They go to brokers.

11 MR. SMITH: Right.

12 MR. SMILLIE: And the brokers say,  
13 "We've either got it or we don't," and then  
14 they go to their certification agent and they  
15 say, "I went to hop union, datta-datta-datta,"  
16 --

17 MR. SMITH: Correct.

18 MR. SMILLIE: -- "for brokers,  
19 looking for hops, and they didn't have it, so  
20 I got to use conventional."

21 MR. SMITH: Correct.

22 MR. SMILLIE: So, something is not

1 adding up for me, in that, that seems to be  
2 the approach of many craft brewers to using  
3 hops, is they go to a broker.

4 But you're saying that 99.1  
5 percent of the craft brewers contract for a  
6 contract, and they don't contract with  
7 brokers, do they?

8 MR. SMITH: Yes, they do.

9 MR. SMILLIE: Okay.

10 MR. SMITH: And then often what  
11 happens is the brokers then contract with the  
12 growers, and then brokers are kind of the  
13 middle man that kind of has the information.

14 The problem on the organic side is  
15 that brewers would go to the brokers looking  
16 for the organic form of the variety when it  
17 wasn't available when they're looking to buy  
18 hops.

19 At no point was any communication  
20 to the growers given that these varieties are  
21 demanded organically. We're all listed on the  
22 606 website, but never had brewers come to us



1 directly. They just kept going back to the  
2 same brokers, and the information wasn't  
3 trickling down to the grower level.

4 MR. GIACOMINI: John?

5 MR. FOSTER: In your experience,  
6 are those brokers certified organic?

7 MR. SMITH: Yes, a number of the  
8 brokers are. Some of them are not. There are  
9 certified organic processing facilities. I  
10 know of three, I believe three, of the four  
11 main hop -- or maybe all four, three or four  
12 of the main brokers are certified organic,  
13 that handle the hops off of all of our farms.  
14 They go through certified organic pellet mills  
15 and processing facilities.

16 MR. FOSTER: So, still, it wasn't -  
17 - the message wasn't getting delivered to the  
18 growers, it sounds like?

19 MR. SMITH: No.

20 MR. FOSTER: Okay.

21 MR. SMITH: Absolutely not.

22 MR. FOSTER: Okay, thanks.

1 MR. GIACOMINI: Further questions  
2 or comments? Tracy?

3 MS. MIEDEMA: I had a comment, just  
4 to my colleagues here on the Board.

5 You know, we get into this debate  
6 about 606 every time, and you know, what we're  
7 hearing from the hop growers is that the  
8 "build it and they will come" model that we  
9 hope for, looking at 606 as an opportunity  
10 list, isn't working, and I thought your  
11 comment was so insightful up here, that when  
12 there is a very narrow use for a material on  
13 606 it needs to be, "come and we will build  
14 it".

15 You know, we know that 606 does  
16 different things, to different industries, and  
17 I think that we're starting to gather some  
18 institutional knowledge that will help us  
19 determine when to put items on 606.

20 MR. GIACOMINI: Thank you. Further  
21 comments or questions? Seeing none, thank  
22 you.

1 MR. SMITH: Thank you.

2 MR. GIACOMINI: Next up, Harriet is  
3 ready. Patrick Leavy on podium two and Kim  
4 Deitz, I have for -- oh, we have a different  
5 one up here.

6 MS. BETRCHA: Laura Betrcha.

7 MR. GIACOMINI: Laura Betrcha,  
8 sorry, my list is different. We'll get it  
9 fixed.

10 MS. BEHAR: Okay, hello, everyone.  
11 I just want to first invite everyone to a  
12 wonderful dinner and music tomorrow night at  
13 the Monona Terrace. Organic Value is  
14 providing two buses, to take people from here  
15 to Monona Terrace. It's a Frank Lloyd  
16 designed building, right on the lake, and it's  
17 beautiful, and all the food is coming from  
18 Wisconsin, and organic beer. The only thing  
19 not from Wisconsin that -- is organic wine,  
20 from France.

21 So, at this point, we don't have  
22 organic wine industry here in Wisconsin.

1                   So, that's an invite, and I'm  
2                   going to break from my usual, and I'm only  
3                   going to talk about one topic, and that's  
4                   organic apiculture.

5                   I want to thank the livestock  
6                   committee, Joel and Jennifer, especially, for  
7                   the work that they did and the thoughtful time  
8                   they spent reviewing the recommendations put  
9                   forward by the ACA task force, and I was one  
10                  of the members.

11                  I'm mostly going to speak about  
12                  the -- a response to the Vermont organic  
13                  farmers, and their concerns with the standard.

14                  Most consumers and people feel  
15                  that, well how can you have organic honey or  
16                  bee products because honeybees are free-  
17                  flowing and -- how do you control them? I  
18                  think the standard really does address those  
19                  concerns.

20                  This standard that you have is  
21                  verifiable and it is practical and doable, and  
22                  there is a certified organic honey producer in

1 the audience.

2 It's equivalent with the EU and  
3 Canada, and it's consistent, most of all, with  
4 our current wild harvest standards, and our  
5 current livestock standards.

6 So, the forage zone really needs  
7 to be 100 percent certifiable. I don't think  
8 there should be allowance for home-lawns or  
9 any other area, in that 1.8 forage zone, where  
10 we know the bees are going to be doing the  
11 massive part of their foraging. We need to  
12 have that be either certifiable as wild  
13 harvest, or bee-certified organic land.

14 This is similar to the pasture  
15 regulation. If you cannot meet the pasture  
16 regulation of 120 days and 30 percent dry  
17 matter intake, then I'm sorry, you can't  
18 produce organic ruminant livestock.

19 So, if it's difficult to do this  
20 achievable standard in some regions, then it's  
21 kind of a problem, I guess, but we shouldn't  
22 lower the standards just to allow other people

1 to come into the scope of organic honey  
2 production.

3 Part of the organic management for  
4 all livestock species is providing high  
5 quality feeds, and this standard for  
6 beekeepers is no exception.

7 They must clearly describe all the  
8 forage, the density, the type of forage, the  
9 time of year, all of that is being clearly  
10 tracked in the organic system plan. They must  
11 -- and it's understood, then, weather and  
12 other factors may cause a dearth of good  
13 forage in that forage zone, and that is why we  
14 have that further surveillance zone where we  
15 are tracking risks, to make sure that there  
16 isn't significant risk, and we're leaving that  
17 up to the certifiers to then determine how  
18 significant that risk is in that forage zone.

19 The prohibition of genetically  
20 modified crops within a four mile radius and -  
21 - for non-organic farmers says it's five, but  
22 it's only four -- needs to be deemed as a

1 risk.

2           However, we're letting in that  
3 forage zone -- in that surveillance zone,  
4 because never -- we're not going to be allowed  
5 at all in the forage zone.

6           If there is 10 acres of GMO corn  
7 in that forage zone, the risk may not be as  
8 great as 1,000 acres of GMO canola, and so  
9 we're going to let that certifier decide,  
10 based on what's the forage in the forage zone  
11 that's certifiable as organic, how much risk  
12 is in the further surveillance zone?

13           There is also an understanding  
14 that there is areas where there are  
15 agricultural activities or human habitation  
16 that make it impossible for bee keepers to  
17 produce USDA organic honey, but there are also  
18 many wild acres in our land where we can  
19 produce organic honey.

20           The best food for bees is their  
21 own honey and when you remove all the feed  
22 from the hives, which is, again, requested by

1 the non-organic farmers, you are taking away  
2 their best food, and then you just replace it  
3 with organic sugar and that is not good  
4 husbandry.

5 I don't believe that our standards  
6 should be based on testing. It's a --  
7 sadly, a slippery slope. We don't test  
8 anything else to prove organic. We are based  
9 on a system of production.

10 Lastly, there is -- we really need  
11 to move this standard forward, because there  
12 are a wide variety of organic apiculture  
13 products currently in the marketplace with  
14 very differing standards, and it's very  
15 confusing when there is one organic standard  
16 that causes question of the -- by the  
17 consumers in the marketplace, like, what does  
18 this mean, it casts a shadow on all organic  
19 products.

20 MR. GIACOMINI: Thank you.

21 Questions? John?

22 MR. FOSTER: Thanks, Harriet. So,



1 I know you have some good inspection and  
2 certification experience.

3 MS. BEHAR: Yes.

4 MR. FOSTER: With respect to the  
5 square miles, that are inside that radius --

6 MS. BEHAR: Yes.

7 MR. FOSTER: -- how do you envision  
8 certifiers and inspectors verifying the uses  
9 that are -- you know, the features within that  
10 radius?

11 MS. BEHAR: Well, that would be --

12 MR. FOSTER: Well, getting  
13 verified, at the time of the inspection?

14 MS. BEHAR: Yes, well, there should  
15 be a map, and the map should show either a  
16 plat of who owns what land, and then there  
17 would be affidavits from those land owners.

18 Now, let's say someone does have a  
19 home in that forage zone. I don't see -- and  
20 they're only mowing the lawn. I don't see why  
21 it would be difficult to have that person sign  
22 and affidavit, and if anything then they are

1       then a willing participant in an organic  
2       production system, and that affidavit not only  
3       gives integrity to the organic label, but it  
4       also brings that land owner into an  
5       understanding of they've made an agreement to  
6       not put any prohibited substances on their  
7       land.

8                   MR. FOSTER: I was asking more  
9       about that's going to get verified at the  
10      inspection, because if it's part of OSP, it's  
11      got to be verified at the inspection. I  
12      assume.

13                   MS. BEHAR: Well, you can get in a  
14      car and drive around. There is -- a lot of  
15      it -- it's not that the inspector, even if  
16      they're inspecting a 400 acre corn field they  
17      don't walk every square foot of that organic  
18      corn field. They can see areas of wild area,  
19      and they look at aerial photos to see where  
20      the bordering areas are.

21                   You can get a pretty good idea of  
22      land use, especially if it's a wild area,

1 let's say, out in North Dakota. You might  
2 have Bureau of Land Management land, where  
3 there is 25,000 acres of continuous land  
4 that's all being managed under one agency and  
5 they can sign one affidavit.

6 MR. FOSTER: I'm just checking,  
7 what's the square miles within that radius?

8 MS. BEHAR: For the -- I believe,  
9 for the forage zone, it's about 3,200, but --  
10 it's 6,600 square miles for the full four  
11 miles, which would include the surveillance  
12 zone, and so, then, I believe it's about 3,300  
13 -- I'm sorry, this is acres.

14 MR. FOSTER: Yes.

15 MS. BEHAR: Sixty-six-hundred acres  
16 --

17 MR. FOSTER: Right.

18 MS. BEHAR: -- for the four square  
19 miles and about 3,200 acres in the 1.8 forage  
20 zone.

21 MR. FOSTER: Right, okay, for the -  
22 - that's just a lot of ground, for an

1 inspector to verify it, by some means, and if  
2 it's part of the OSP, then I don't think the  
3 affidavits would be adequate. It should be  
4 verified at the inspection, and I'm just --  
5 I'm wanting to make sure that's getting built  
6 into this.

7 MS. BEHAR: Right, I think most of  
8 it will be wild land, and the affidavits will  
9 be human habitation residence areas, probably  
10 summer homes, that sort of thing, and that's  
11 where the affidavits will be.

12 MR. GIACOMINI: Joe Dickson, first.

13 MR. DICKSON: I just wanted to very  
14 briefly thank Harriet and the ACA task force,  
15 for their incredible work on this process.  
16 They're very largely responsible for our  
17 ability to work productively on it, and we  
18 appreciate it.

19 MS. BEHAR: It was good working  
20 with you.

21 MR. DICKSON: Thank you.

22 MR. GIACOMINI: Joe Smillie.

1 MR. SMILLIE: The discussion we  
2 just had, Miles, is that going to be covered  
3 by your guidance policy on wild crops? Will  
4 that be part of your new wild crop policy  
5 that's -- we're going to receive guidance on  
6 shortly, the five wild crop?

7 MR. McEVOY: The wild crop guidance  
8 is already out. The draft guidance is already  
9 out.

10 MR. SMILLIE: Right.

11 MR. McEVOY: Yes.

12 MR. SMILLIE: Will this -- will the  
13 apiculture be melted into that, as part of  
14 that, because as Harriet said, a lot of it is  
15 going to be wild.

16 MR. McEVOY: Well, if that draft --  
17 when the draft guidance becomes final  
18 guidance, then that would be guidance on the  
19 interpretations of the regulations.

20 MR. SMILLIE: Right.

21 MR. McEVOY: So, with the  
22 apiculture recommendation, we'll take that

1       into rule making. So, that would be the rules  
2       that the -- the guidance would have to comply  
3       with the rules. So, this is a very good  
4       discussion about not just what the standards  
5       are, but how do you verify that the standards  
6       are being met?

7                   MR. SMILLIE: Right.

8                   MR. McEVOY: Are affidavits being -  
9       - would they be accepted, and it's -- my  
10      reading of the recommendation is you don't  
11      address that in the recommendation.

12                   It's not part of a current organic  
13      system plan to have affidavits for certified  
14      organic land. So, this would be a new  
15      concept, to allow part of certified organic  
16      land to be verified through an affidavit? I  
17      think you guys need to think about that,  
18      whether or not you want to go there or not.

19                   Wild land is different than  
20      homeowners land, that there is no real  
21      inspection. Are they home or not, during the  
22      inspection? You know, they could be off at

1 work. You know, they might sign something,  
2 they're not using any prohibited substances,  
3 but how do you -- you know, do they know what  
4 a prohibited substance is? You know, 'weed  
5 and feed', is that prohibited? Lots of  
6 questions there, for me.

7 MR. SMILLIE: Lots of questions.

8 MS. BEHAR: There are currently,  
9 affidavits used for adjoining land use, that  
10 prevent corn growers, let's say, they don't  
11 want to have a buffer, and they get a -- they  
12 get an adjoining land use affidavit. That  
13 person is never personally interviewed, and  
14 then they don't have to have a buffer, because  
15 that person on the other side of the fence is  
16 verifying that they are not using a prohibited  
17 substance, so therefore the organic farmer  
18 doesn't have to have a buffer.

19 So, we already have an affidavit  
20 process in place, for absentee people that are  
21 particularly interviewed.

22 MR. SMILLIE: Harriet, when you

1 said that, you know, some people couldn't meet  
2 the conditions, therefore they're not -- they  
3 shouldn't be allowed to lower the standards so  
4 that they could compete.

5 Do you see a possibility that  
6 North American beekeepers and apiaries could  
7 be at a disadvantage to others in wilder  
8 regions, let's put it, you know, because  
9 that's a lot of -- that's a big foraging area,  
10 and you know, it would seem to me to put North  
11 American, or higher density population area  
12 beekeepers at great risk where we need them  
13 most.

14 Now, remember, bees don't only  
15 make honey. They pollinate our crops and the  
16 bee -- the whole industry is now being  
17 threatened by many things, and having an  
18 overly prescriptive regulation might put a --  
19 might make a honey -- organic honey production  
20 disadvantaged -- you know, not really  
21 applicable to some of our more -- less wild  
22 areas.



1 MS. BEHAR: Well, I believe  
2 actually, currently, there are -- actually,  
3 within the 30 miles of my house there is an  
4 8,000 acre reserve, and if I put my bees right  
5 in the middle of it, I'm in the middle of an  
6 agricultural area.

7 There is lots of areas in North  
8 Dakota. There's areas in Northern Wisconsin.  
9 There's areas in Michigan. It's actually,  
10 6,600 acres is not that much of a big block of  
11 land, especially if you're talking out West,  
12 and so, yes, it puts a disadvantage to people  
13 who currently live in agricultural areas or  
14 suburban areas. It's going to cut out urban  
15 bee keepers, that kind of thing.

16 But I think we do need to think  
17 about being consistent with our own standards,  
18 as well as being equivalent with Europe and  
19 Canada, and to also give the consumer a  
20 product where they can say, "Yes, that forage  
21 area is being tracked. We know where those  
22 bees went."

1 MR. GIACOMINI: Kevin?

2 MR. ENGELBERT: Yes, to follow up  
3 on that, Joe, we understood all of that in the  
4 committee, and we realized that this -- it's  
5 going to be restrictive to certain areas of  
6 the country. It's just an inevitability. No  
7 matter what you do, you're going to restrict  
8 some areas.

9 I don't think that's going to  
10 preclude bee keeping. For example, in my  
11 area, and they may not attain organic  
12 certification in a crowded area, but they'll  
13 still keep bees, they'll still have honey, and  
14 they'll explain to their customers, "I'm  
15 organic, except I can't meet this one  
16 requirement. I can't get this one signature,"  
17 whatever.

18 But I don't think we're going to  
19 be detrimental to beekeeping, in general, but  
20 we wanted to be sure that if there is organic  
21 honey certified, that it does meet an absolute  
22 strict standard, because these are a wild

1 animal, even though they're managed, where the  
2 hives can be transported and, you know,  
3 controlled. So, that was the thought process.

4 MR. GIACOMINI: Further debates?  
5 Discussion? Comments?

6 MS. BEHAR: Thank you.

7 MR. GIACOMINI: Thank you. Next up  
8 is Patrick Leavy, Laura Betrcha and Claudia  
9 Reid, and the whole.

10 MR. LEAVY: Okay, are the  
11 microphones working?

12 MR. GIACOMINI: I think so.

13 MR. LEAVY: Okay, thank you. Good  
14 afternoon. My name is Pat Leavy, and I'm with  
15 the American Organic Hop Grower's Association.  
16 I'm their President, which is not too hard a  
17 thing to do if you get four votes.

18 I want to thank the organic  
19 community, for all of the support on the hop  
20 petition. I think there was maybe almost 25  
21 percent of the comments for this meeting were  
22 regarding hops. Didn't overload the system,

1 but obviously, it was something that people  
2 were concerned about.

3 I'm fairly lucky -- or very lucky  
4 today, in the fact that I knew what the prior  
5 people were going to say, so, I never prepared  
6 any remarks, figuring there may be something  
7 that comes up.

8 So, what I can do is, we can talk  
9 about the relationship between the sunset and  
10 the petition, or I can say 'thank you' and  
11 give you some time back.

12 It's really -- I mean, that's been  
13 sort of a -- we've touched on that, but it's  
14 really up to you. If you want to talk about  
15 it, I can try my effort to explain it, or I  
16 think we've said enough.

17 MR. GIACOMINI: Well, I certainly  
18 have questions on that. But I think we'll see  
19 how that goes in the committee discussion, and  
20 then we have another whole day of -- but I'm  
21 sure there will be someone talking about hops.

22 MR. LEAVY: Yes, okay.

1 MR. GIACOMINI: Or if you're still  
2 here, that would be great.

3 MR. LEAVY: We are here until  
4 Friday morning.

5 MR. GIACOMINI: Okay.

6 MR. LEAVY: Thank you.

7 MR. GIACOMINI: Any other comments  
8 or questions? Steve, one second please.

9 MR. DEMURI: Just a quick comment.  
10 I want to thank you and your organization, for  
11 all the comments that did come in, because  
12 that's how we work. We can't work in a  
13 vacuum. So, that helps us to learn what's  
14 going on in the industry, so we can make  
15 decisions. So, thank you.

16 MR. LEAVY: Okay.

17 MR. GIACOMINI: Okay, next is Laura  
18 and Claudia. Lisa, can you scroll, please, so  
19 they can see who is in the whole room? There  
20 is Kim. Thank you. Go ahead.

21 MS. BETRCHA: Hi, I am Laura  
22 Betrcha, with the Organic Trade Association,

1 and the Board has all of our written comments.

2 So, I'm only going to focus on a few topics

3 right now for you, and then one topic for

4 which we did not provide written comments.

5 So, that will be new.

6 The first area I want to talk

7 about is corn steep liquor. For those of you

8 that are members of the Trade Association,

9 you've probably followed it, but there has

10 been considerable discussion on the OTA farm

11 supplies forum regarding the corn steep liquor

12 majority opinion and minority opinion.

13 While I can't say that there is

14 complete unanimity amongst the membership and

15 stakeholders at OTA involved in this, there is

16 absolutely a consensus amongst the members

17 that supports the minority position that CSL

18 should remain classified as a non-synthetic.

19 The full rationale for what we

20 heard from our members is in our written

21 comment, but just to summarize. I think that

22 two things that sort of emerged from the

1 discussion is concern about the lack of  
2 consistency in the majority position with the  
3 frame work developed previously by the  
4 materials working group that came up, and also  
5 concern about the potential implications on a  
6 lot of other currently allowed crop inputs,  
7 were CSL to be reclassified as a synthetic.  
8 So, those were the two consistent things we  
9 heard.

10 The second area is in regard to  
11 the livestock committee's work on animal  
12 welfare, and you know, first, OTA wants to  
13 commend the committee for pressing forward on  
14 these issues that are fundamental to organic,  
15 including animal welfare and outdoor access,  
16 and we really urge the Board to continue to  
17 take all the time you need to deliberate these  
18 issues, in collaboration with the  
19 stakeholders, to get them right when you pass  
20 your final recommendation, because of the  
21 process that follows once you pass your  
22 recommendation.

1           In that vein, we would encourage  
2           the Board to directly address the potentially  
3           conflicting requirements that FDA and APHIS  
4           may have with the organic regulations. That  
5           way, the Board will have an opportunity to  
6           fully vet those issues before you pass a final  
7           recommendation, rather than passing something,  
8           and then having those issues come up later in  
9           the process, without your, sort of, direct  
10          ability to get involved in that.

11           On the animal transport, handling  
12          and slaughter, again, you know, we thank you  
13          for taking up this issue, since the spring  
14          meeting. We were really encouraged to see  
15          movement on that and progress on that, and in  
16          the same vein, that completing those  
17          recommendations is going to take time, we do  
18          believe that there is an immediate need to  
19          address animal welfare as it relates to animal  
20          slaughter and slaughter facilities. And we  
21          don't believe that that will require rule  
22          making, and we would encourage the Board to



1 encourage the program to clarify in advance of  
2 a final recommendation and rule making that  
3 the livestock living conditions standards  
4 apply until the time of death, particularly  
5 the requirement that animals be maintained  
6 under conditions which provide for a reduction  
7 of stress appropriate to the species.

8 We think this would be a way that  
9 certifiers and inspectors could be immediately  
10 encouraged to verify beyond what, you know, we  
11 think of as a 'hog and ham' out of a slaughter  
12 facility, where most of the work being done to  
13 certify and inspect those facilities is around  
14 audit trail and prevention of commingling, and  
15 we think there is a lot more that could be  
16 done right away to address animal welfare at  
17 the slaughter facilities, and that we have an  
18 obligation to do what we can now in that  
19 regard.

20 I'm going to move onto nutrient,  
21 vitamins and minerals. Just a quick update,  
22 we referenced in our written comments that we

1 have a member task force working on a white  
2 paper on this topic, and that includes an  
3 analysis of the range and scope and economic  
4 impact of fortified organic products and the  
5 organic farm commodities that supply  
6 ingredients to those products.

7           OTA has enlisted a third party to  
8 aggregate and verify this data and the  
9 analysis is due back to us early this week.

10           So, once that's complete we'll be  
11 finishing up that final white paper. We'll  
12 share it with the Board and the program, and  
13 that should be well in advance of the end of  
14 this year.

15           Lastly, I just want to quickly  
16 address this CAC committee recommendation on  
17 certification to USDA guidelines, or  
18 regulations, as you're now calling them.

19           We didn't provide written comment  
20 on this. OTA supports the "made with"  
21 category, certainly, as legitimate, but we  
22 really believe there needs to be a reward for

1 producing a product to the 95 percent level  
2 that remains. More than incremental, it  
3 needs to be significant, in terms of the value  
4 to encourage the marketplace to continue to  
5 strive, to get into that 95 percent level.

6 And we struggled with the  
7 recommendation in that regard, to balance that  
8 with what would be, obviously, a truthful  
9 statement, that the products are certified to  
10 USDA regulations.

11 We also think some of the data  
12 analysis should be justified. The data  
13 referenced in the recommendation needs to be  
14 justified, our internal data about trends  
15 towards the "made with" category doesn't jive  
16 with what we have internally versus what was  
17 in the recommendation. I think that needs to  
18 be explored more. Syndicated data could  
19 answer the question for you. Thanks.

20 MR. GIACOMINI: Okay, questions or  
21 comments? Kevin?

22 MR. ENGELBERT: With regard to your

1 last comments, about trying to get more from  
2 the "made with" category to the 95 percent,  
3 isn't that more -- isn't the economic reward  
4 enough to make that happen, assuming that  
5 people will charge more for an organic or a 95  
6 percent organic product than they would a  
7 "made with" product?

8 MS. BETRCHA: Because, presumably,  
9 the product would be more expensive at retail,  
10 you'd have a higher margin on it. I think  
11 they're more expensive to produce, number one,  
12 and I think the -- you know, at least what the  
13 -- my understanding of what the marketplace  
14 identifies as the reward is the ability to use  
15 the seal and have a distinguishing presence on  
16 the primary display panel that's not allowed  
17 in other labeling categories.

18 MR. GIACOMINI: Jay?

19 MR. FELDMAN: Thank you for your  
20 comments. On the corn steep liquor issue, I  
21 appreciate your comments on that, and the  
22 value that you bring to this as a recycled

1 product that has -- could have value. It does  
2 have value in organic production.

3 MS. BETRCHA: Yes.

4 MR. FELDMAN: Unfortunately, our  
5 task, as we looked at it, is much narrower  
6 than, I think, the focus of your comments may  
7 be, and that is whether the use of an input in  
8 a production process causes chemical change.

9 I mean, that was our charge, as  
10 you know, as a committee, to sort of evaluate  
11 that before we proceeded with an evaluation of  
12 other questions such as essentiality and other  
13 secondary positive effects which this material  
14 may have, or does have.

15 So, that's our challenge, and I'm  
16 not sure that your comments -- and maybe you  
17 can elaborate on this -- really address that  
18 specific question, which is our regulatory and  
19 statutory duty to address.

20 As you know, the law defaults  
21 against synthetics and then enables us to put  
22 materials back on the National List, subject

1 to an evaluation of some chemical change  
2 process.

3 And so, we looked at the  
4 literature, and I'm wondering if you have any  
5 assessment of the chemical change process,  
6 which we identified, and as did the technical  
7 review from USDA identify, as one associated  
8 with the cleavage of disulfide bonds  
9 associated with the introduction of sulfur  
10 dioxide.

11 MS. BETRCHA: So, I'm assuming your  
12 question, Jay, is whether or not we believe  
13 that the breaking of those bonds constitutes  
14 a chemical change.

15 MR. FELDMAN: Yes.

16 MS. BETRCHA: Is that exactly what  
17 you're asking?

18 MR. FELDMAN: Yes, that's it.  
19 That's what I was asking.

20 MS. BETRCHA: There was some  
21 discussion of this yesterday at a meeting, and  
22 I think that I certainly am aware of your

1 position that that would constitute chemical  
2 change. I think that that is not assessment  
3 that is uniformly held.

4 I'm not a chemist. So, I'm not  
5 going to even attempt to answer it. I know  
6 Kim is in line behind me, and maybe as a  
7 representative of the materials working group  
8 might be able to address that, in terms of the  
9 frame work that they developed for assessing  
10 synthetic and non-synthetic.

11 So, I'm going to defer that and  
12 ask you to follow up with my colleague behind  
13 me on that, if that's okay with you, Kim.  
14 Thank you.

15 MR. FELDMAN: Can I have a follow  
16 up with that, as a non-chemist?

17 In a more generalized way, one of  
18 the issues that was -- you referenced the  
19 minority report -- one of the issues that was  
20 brought up I there was the question of --  
21 which this Board has addressed before --  
22 traditional versus more modern corn wet-

1       milling process, and in the literature there  
2       is some discussion about the variability in  
3       the resulting SO-2, or sulfuric acid, in the  
4       steep water, you know, and so there is this  
5       great -- there is this potential variability,  
6       depending on the manufacturing process.

7               As an industry representative, do  
8       you worry, at all, about a product that's  
9       being used that has great variability, and  
10      where you cannot identify the actual levels of  
11      a substance of concern, to perhaps, the Board  
12      and consumers?

13             MS. BETRCHA: Well, that --

14             MR. FELDMAN: Just in a more  
15      general. I'm not asking you scientifically,  
16      but generally.

17             MS. BETRCHA: No, and I think  
18      honestly, Jay, that question is a little bit  
19      too general, to even answer.

20             I mean, are you asking me, is  
21      industry concerned of synthetics ending up in  
22      products because we can't detect them? Of



1 course.

2 I mean, I think there is all kinds  
3 of things that -- the detection is variable  
4 and evolving. So, I'm not really, really  
5 quite getting at the relevance of the  
6 question, and I don't really know how to  
7 respond to that.

8 MR. FELDMAN: Let me reiterate it.  
9 I wasn't asking about levels. I was asking --  
10 I wasn't asking about detection capabilities.  
11 I was asking about variability of actual  
12 levels, defined levels, which are not subject  
13 to the challenges of detection, but which are  
14 identified at different levels, according to  
15 other tests -- other submissions that we have,  
16 as a Board.

17 So, I'm wondering if the industry  
18 would be concerned about identifiable levels  
19 that are quite variable within a large range,  
20 without being able to pinpoint what that range  
21 is?

22 MS. BETRCHA: I would suppose the

1 answer to that would be to -- that would  
2 depend on whether or not that variability  
3 crossed that threshold about whether or not  
4 that substance appeared in finished product  
5 and would render it synthetic.

6 I mean, I think -- I don't know if  
7 you have that threshold --

8 MR. FELDMAN: Okay, thank you.

9 MS. BETRCHA: -- in mind, yes.

10 MR. GIACOMINI: Further comments  
11 and questions? Seeing none, thank you.

12 Next up is Claudia Reid and Kim  
13 Deitz and Bob Durst.

14 MS. REID: Good afternoon. My name  
15 is Claudia Reid. I'm the Policy Director for  
16 CCOF. We are an organization that was founded  
17 in 1973. We're a trade association that  
18 represents about 2,300 certified operations  
19 and 350 supporting members in 35 states and in  
20 three countries.

21 Our sister organization, CCOF  
22 Certification Services, is one of the oldest

1 and largest organic certifiers in North  
2 America.

3 I'm going to be speaking to you  
4 today on two issues. We did submit written  
5 comments on these.

6 The first one is engineered nano-  
7 materials and organic production, processing  
8 and packaging, and the second one is the  
9 sunset review process policy provision.

10 For the nano-tech -- engineered  
11 nano-materials and organic production,  
12 processing and packaging, we want to truly  
13 acknowledge the efforts that the materials  
14 committee went through to integrate technical  
15 information and to present their  
16 recommendation in a very understandable  
17 fashion.

18 We agree with all of the  
19 recommendations, except that we also, along  
20 with one other commenter that you heard  
21 earlier today, really don't think you need to  
22 wait for a symposium to go ahead and make a

1 decision.

2 We're really concerned that  
3 holding up a decision for symposium will just  
4 make the problem that we already have worse.  
5 We feel that this delay just exacerbates the  
6 confusion that's out there already, and we  
7 concur with NOC's comments earlier about  
8 simply classifying it as a synthetic and  
9 making a decision.

10 Secondly, we want to acknowledge  
11 the policy development committee for their  
12 work on the sunset review process policy  
13 proposal. We applaud this proposal to change  
14 the sunset review process of the NOSB, to  
15 allow for changes and annotations.

16 As it says in that policy  
17 proposal, "The ability to add or change  
18 annotations (restrictions) on applicable  
19 National List materials may be important to  
20 the Board sunset decision, given changes in  
21 the use patterns of allowed materials and  
22 scientific understanding."

1           We also urge the Board to consider  
2 a future policy to take up changes in  
3 annotation in between the five year sunset  
4 review.

5           Several materials that were just  
6 reviewed and renewed for five years have  
7 annotations that should be re-examined, for  
8 example, aquatic plant extracts and micro-  
9 nutrients, both of which have annotations that  
10 may benefit from the review of the annotation,  
11 were just reviewed, and they were renewed for  
12 five years.

13           We would like you to consider this  
14 new, sort of, in between look in those kinds  
15 of circumstances.

16           Again, CCOF thanks you for this  
17 opportunity and we welcome your questions or  
18 comments.

19           MR. GIACOMINI: Questions or  
20 comments? Kevin?

21           MR. ENGELBERT: Thank you. What do  
22 you see as triggering the need for an

1 additional review before the five year sunset  
2 period is up? Just a public comment, such as  
3 you just made, or a formal request or a new  
4 petition, or what are you envisioning for the  
5 --

6 MS. REID: That information. So  
7 the colleague that I worked with asked me to  
8 bring that idea up, and I don't have anything  
9 more specific from her other than what I just  
10 read to you.

11 But I can certainly ask her to let  
12 me know whether or not she was responding to  
13 the public comments or to past experiences  
14 that she's had in over 30 years of speaking  
15 before this Board. I suspect it's the latter,  
16 since the public comments were just posted  
17 several weeks ago. Thanks, Kevin.

18 MR. GIACOMINI: Jay?

19 MR. FELDMAN: Thank you. Can you  
20 speak to the enforceability of annotations?  
21 Some people have raised the issue of it being  
22 difficult for certifiers, as we, you know, to

1 suggest that an annotation might be necessary,  
2 and possibly, adopt one, that that increases  
3 the difficulty of enforcing it.

4 MS. REID: I probably could speak  
5 to the enforcement of annotations, but I'd  
6 actually rather defer to somebody on the  
7 certification side, if that's all right with  
8 you.

9 MR. FELDMAN: Sure.

10 MS. REID: They know me well enough  
11 to know that I can speak to just about  
12 anything, but they are the experts. Thank you.

13 MR. GIACOMINI: Further questions  
14 or comments? Okay, thank you. Kim Deitz, Bob  
15 Durst and Ivan Martin.

16 MS. DEITZ: Good afternoon. My  
17 name is Kim Deitz. I'm going to wear a couple  
18 of hats up here, so I'll try to keep them  
19 clear for you.

20 First, I want to just thank the  
21 outgoing Board members. I've been in your  
22 shoes and thank you for all the hard work and

1 the dedication. I know it pays off and again,  
2 it's noted.

3 I'm the Regulatory Manager for  
4 Smucker Natural Foods. So I'm going to give  
5 my comments first on Smucker Natural Foods and  
6 then, as a concerned citizen, over sunset.

7 Smucker Natural Foods, we are in  
8 agreement with the pectin, removal of the  
9 pectin of 605A and B, and to move it to 606,  
10 non-advocated. We do use that form.

11 As far as flavors go, my comments  
12 on flavors, we're still very concerned that  
13 flavors are being sunsetted, as is. We've  
14 converted all of our products to organic  
15 flavors, and we believe that there is -- we  
16 need to do something with those. Another five  
17 years is not something we sit well with.

18 So we do urge you to get a task  
19 force together and to address that soon. I  
20 hear rumblings out there, that there is  
21 petitions out there, already. So I know that  
22 that's coming.



1                   Colors: I think I've commented for  
2                   three years that the CAS numbers are wrong on  
3                   colors, and my comments, I put the correct CAS  
4                   numbers. So if you guys could take a look at  
5                   those. I don't know how people are using the  
6                   wrong CAS numbers, and Jay, that goes to your  
7                   annotations, because if the annotations are  
8                   wrong, I'm not sure how people are using  
9                   those.

10                   Also, with ANOTO, we've switched  
11                   to the organic form, and it works very well  
12                   for us. So we support that as well.

13                   As far as sunset, and I'm going to  
14                   put on my materials hat for sunset. I did  
15                   write public comments. I'm going to hand  
16                   those out to the committee, but I'm just going  
17                   to read them, because I want to make sure that  
18                   people are going to hear what I have to say.

19                   So please accept these comments as  
20                   continued dialogue over the need to clarify  
21                   and adjust the sunset review process.

22                   As many of you know, I served as

1 the NOSB representative from 2000 to 2005,  
2 when the sunset review process was first  
3 established.

4 It was also during my term on the  
5 Board that I chaired the NOSB materials  
6 committee and led the Board through the first  
7 sunset review of the National List of  
8 materials.

9 Ten years later, I agree that  
10 there is a need to clarify the sunset process,  
11 not only for the role of all of you current  
12 and future Board members, but also to ensure  
13 that the public has a process that is  
14 understood by all.

15 So there was two questions. The  
16 first: should those in the organic market, the  
17 users, be required to justify or defend  
18 current materials on the National List, in  
19 other words, burden of proof?

20 So I agree that if there is a new  
21 technology, new material or other alternative  
22 that has emerged since the original vote of a

1 material, that it is the responsibility of the  
2 organic industry to justify that existing  
3 need.

4 It's also -- if there are no new  
5 alternatives to a material, then the burden of  
6 proof should not fall on the industry to  
7 justify continued use. In other words, if  
8 there is no new technology or alternatives,  
9 then a material should be renewed, so long as  
10 public comment supports the continued use as  
11 is.

12 If there is new technical  
13 information, then the burden of proof should  
14 shift to the industry or the user to justify  
15 the existing need.

16 I've also given a couple of  
17 examples. I think the pectin is a good example  
18 of how we are now shifting the burden of  
19 proof. You know, there is a petition that  
20 came in, saying that there is this new  
21 annotation, this new way to look at it. The  
22 handling committee is recommending to sunset

1 the two, 605A and B, and then to go to 606.

2 So, again, if somebody still  
3 needed that pectin, because the non-annotated  
4 wouldn't work for them, they would need to  
5 prove that in some way.

6 I also feel strongly that it's the  
7 role of the NOSB to do their homework and to  
8 ensure that alternatives to existing materials  
9 on the National List are viable. Alternatives  
10 should be supported with documentation, such  
11 as a new petition, TAP or technical research  
12 to provide the industry with the information  
13 that they need to do the research and to test  
14 alternatives.

15 The second question was to what  
16 extent can the limitations on the use of the  
17 listed material be changed to reflect the  
18 current or revised annotation.

19 I provided public comment last  
20 year, and said I do believe that annotations  
21 could change, during sunset, however, I don't  
22 agree with the current recommendation by the

1 policy committee on the procedural aspects of  
2 that.

3 There is one -- in particular,  
4 they're saying that they want to be able to  
5 invent the annotations during the Board level,  
6 during the vote, and I think that's too risky,  
7 for our industry, that if annotations are  
8 changed on the fly, it could be a detriment to  
9 the industry as well.

10 So I request that you delete that  
11 section of the regs, or the proposal, and I  
12 did, in my comments I submitted to you, I cut  
13 and pasted some language and gave you some  
14 specific language with that, and then I put  
15 some comments on why I didn't think it would  
16 work.

17 MR. GIACOMINI: Any questions or  
18 comments? Katrina?

19 MS. HEINZE: Thank you, Kim, for  
20 your comments. I just have a question about  
21 ANOTO.

22 MS. DEITZ: Okay.

1 MS. HEINZE: Do you use a liquid  
2 form or a dry form?

3 MS. DEITZ: We use liquid.

4 MS. HEINZE: Okay, thank you very  
5 much.

6 MR. GIACOMINI: Questions or  
7 comments? Jay?

8 MR. FELDMAN: Thank you, Kim.

9 MS. DEITZ: You're welcome. We'll  
10 get this.

11 MR. FELDMAN: We'll get this, yes.  
12 I appreciate your comments and your insight on  
13 this.

14 One of the challenges, and I'm  
15 curious how we would deal with this, is the  
16 authority of the Board to make the final  
17 decision.

18 You know, clearly this Board  
19 operates with a heavy reliance on the  
20 committee work, and there is a deference to  
21 the committee. But at the end of the day, the  
22 Board has to -- I can't think of any other

1 examples, maybe you can, of where the Board  
2 has been restricted on the parameters of what  
3 it can vote on, vis-a-vis something that has  
4 come out of the committee.

5 So whereas, that is the, I  
6 understand to be the historic process, the  
7 expectation is that if a technical, rather  
8 technical amendment comes out of committee and  
9 is discussed, both with the majority and the  
10 minority report, and perhaps we do have more  
11 transparency on all the information that went  
12 into that decision-making process, which, you  
13 know, we can talk about.

14 At the end of the day, the Board,  
15 it seems to me, has to be able to discuss  
16 that, and vote on it, and under any procedure  
17 that this Board has followed traditionally,  
18 there is always the chance that somebody could  
19 raise their hand and suggest an amendment.

20 It happened in methionine,  
21 actually, where there was a long discussion in  
22 committee, with the step-down process, and

1 somebody, who will remain nameless, who didn't  
2 know that much about it, made a suggestion and  
3 it was discussed and summarily dismissed  
4 because of the work that the committee had  
5 done.

6 So I think that we have enough  
7 experience here, in the past, on issues like  
8 we're suggesting here in this proposal, that  
9 suggest that people may want to tweak things,  
10 but it's not the kind of thing that I think  
11 would result in the outcome that you're  
12 suggesting, that there would be an overall  
13 major overhaul of a committee proposal that  
14 would then not be subject to public comment.

15 So I'm curious about your comments  
16 on that.

17 MS. DEITZ: Okay, just the way the  
18 recommendation is written, it says that -- say  
19 a committee wants to change an annotation, and  
20 it doesn't pass the majority vote at the  
21 committee level prior to an NOSB meeting, and  
22 it fails, so that recommendation doesn't come



1 through public comment, doesn't get posted and  
2 there is no public comment prior to a meeting.

3 The way the recommendation is  
4 written, it says that somebody else can bring  
5 that up at the Board meeting, and that really  
6 concerns me, because it doesn't give the  
7 public an opportunity to one, even know what  
8 you're thinking prior to the Board meeting.

9 So that is where I disagree --  
10 that is one of my disagreements. If the  
11 committee wants to bring an annotation change,  
12 I think that's -- you know, and it's justified  
13 and it's needed, bring it forward, get the  
14 public comment and then vote on it.

15 But again, what I don't agree with  
16 is making those changes at the fly, at the  
17 NOSB level, before the public has an  
18 opportunity to even know what you're thinking.

19 So, yes, the -- your way is, there  
20 is an annotation on the table. Somebody wants  
21 to tweak it a little bit at the Board meeting,  
22 you might have had public comment, then yes,

1 that's going to have to happen, because you  
2 want to get it right.

3 But what I don't agree with is,  
4 something fails at the committee level, any  
5 Board member can bring up an annotation change  
6 and it could go through, if that makes sense.

7 MR. FELDMAN: I guess my question  
8 to you, as a Board member and such, that --  
9 can you prevent a Board member from bringing  
10 up something that a committee rejected? Is  
11 that really a process that would withstand the  
12 kind of democratic input we're suggesting?

13 MS. DEITZ: Yes, I don't think you  
14 can, or you want to, stop a Board member from  
15 making a recommendation.

16 What I'm worried about, again, is  
17 the sunset process, and if we change a  
18 material during the sunset, we could risk  
19 losing it altogether, or it might not -- you  
20 might get an outcry from the public before  
21 it's supposed to sunset.

22 I'm worried about the sunset

1 process here. Yes, you guys could make  
2 changes, but again, be careful what you do.  
3 Make sure that it's right. Get your public  
4 input. That way it flies through, without  
5 having any hiccups in it, and we don't lose  
6 the material, unless it's intentional.

7 MR. FELDMAN: Right, I mean, I  
8 think the whole point here is that all the  
9 committee work, whether in props or handling  
10 or whatever, is subject to review by the  
11 Board. That process is somewhat, or should be  
12 somewhat transparent.

13 That process results in a  
14 background statement that's presented to the  
15 public, on which the public comments. I'm  
16 losing your -- this idea that there isn't  
17 public opportunity to comment on the sunset  
18 and the various ideas that have emerged from  
19 the committee.

20 Yes, it's possible, after the  
21 committee has done all this work, that  
22 somebody could decide to propose either

1 something new or something that had failed at  
2 committee.

3 But essentially, the process we're  
4 proposing will be subject to public comment  
5 and review, and yes, at the end of the day,  
6 someone could seek to amend that proposal, but  
7 again, we would have received, as a Board, the  
8 input on that decision, by virtue of  
9 publishing in the Federal Register, the sunset  
10 document, which --

11 MS. DEITZ: I think in your  
12 recommendation, you specifically say that if  
13 the committee doesn't vote on an annotation  
14 change, and it doesn't go through the  
15 committee, then it doesn't come to the public,  
16 that another Board member could bring it up at  
17 the Board meeting, and recommend that change.  
18 That's where I'm having the difficulty with.

19 MR. FELDMAN: Okay.

20 MS. DEITZ: So, bring it -- if you  
21 have an annotation change, bring it through,  
22 put it through the Federal Register process,

1 vet it out, the way we're doing here today or  
2 tomorrow or the next day, and then let's vote.

3 But don't bring an annotation  
4 change prior to a meeting -- or at the  
5 meeting, without the public knowing. That's  
6 what I mean. That's my intention.

7 MR. FELDMAN: Okay.

8 MR. GIACOMINI: Jay, microphone,  
9 please.

10 MS. DEITZ: And having had them  
11 comment.

12 MR. FELDMAN: Thanks a lot.

13 MR. GIACOMINI: Kevin?

14 MR. ENGELBERT: Yes, just briefly,  
15 Kim, I understand the concern. But I don't  
16 foresee any problems with a committee not  
17 voting on something or voting something down,  
18 and then another member being able to come to  
19 a meeting and, say, get the whole Board to go  
20 along with something.

21 I mean, we all respect the  
22 committee work, and if the committee turned it

1 down, chances of it coming to the full Board  
2 are -- I don't see that happening.

3 But the one thing I want to be  
4 clear on is your concern about annotation  
5 change, and the motion is simply to restrict,  
6 not to remove or not to allow more usage, and  
7 I'm not sure what the true concern is with  
8 that, why -- given that the anticipation is,  
9 materials that are on the list are continually  
10 being found new uses for, and we may need to  
11 react to that quickly at the Board level if we  
12 don't deem it appropriate.

13 And maybe another six months won't  
14 matter, I don't know. But I just want to make  
15 sure I'm clear on what your true concerns are  
16 with that.

17 MS. DEITZ: I don't have any  
18 concerns with changing an annotation during  
19 sunset, okay, as long as there is a process  
20 for it, and as long as everybody understands  
21 that process, and that the public has plenty  
22 of time to comment on that change. That's as

1 plain as I can say it.

2           Whatever you need to do to assure  
3 us of that, then let's put it in your policy  
4 and let's get it right, so that we're all on  
5 the same page with it, okay? I hope that  
6 answers that.

7           MR. GIACOMINI: Just one more  
8 thing, quickly, if you can, Kim.

9           Can you address the part of the  
10 sunset of, if an annotation change is going  
11 through and getting bogged down in rulemaking,  
12 but it wasn't what was reasserted in sunset,  
13 the process -- how you see that process of  
14 bringing it back to the Board, where it's  
15 already on a short time leash?

16           MS. DEITZ: Yes. I think that's not  
17 a very good idea at all. If an annotation has  
18 changed, it's voted on, it goes through the  
19 process, it goes through the Federal Register  
20 Notice, and then we're about six months out,  
21 before materials go to sunset, and for some  
22 reason that annotation has a problem, the

1 public is going to comment and then we have a  
2 risk of that material coming off the list.

3 I would suggest that either we --  
4 I think we talked about doing a couple of  
5 votes, you know, whatever we can do to make  
6 sure that either the material stays as written  
7 on the National List or the annotation goes  
8 through as voted on.

9 I don't think that you'll be able  
10 to -- I mean, we've got materials from 2007,  
11 that were voted on by the committees, and they  
12 still even aren't on the National List. It's  
13 a very long process. And that concerns me,  
14 that we could risk the industry having  
15 materials.

16 MR. FELDMAN: Switching subjects,  
17 did you have something to say on corn steep  
18 liquor or --

19 MS. DEITZ: Yes, actually, Gwen and  
20 I have signed up for comments on Wednesday.

21 MR. FELDMAN: Oh, okay.

22 MS. DEITZ: So we are going to talk



1 about that.

2 MR. FELDMAN: Thank you.

3 MS. DEITZ: And I see Mr. Bob Durst  
4 is right after me. I know he has some things  
5 to say as well.

6 MR. FELDMAN: Okay, perfect.

7 MS. DEITZ: So we'll give you our  
8 comments on Wednesday.

9 MR. FELDMAN: Thank you.

10 MR. GIACOMINI: Thank you, Kim.

11 Next up, Bob Durst, Ivan Martin and Richard  
12 Wood.

13 MR. DURST: Thanks, folks. I'm in  
14 favor of corn steep liquor being listed as not  
15 synthetic. So right up front, let you know.

16 The minority opinion correctly  
17 looks at the definition of the chemical change  
18 and SO-2 and disulfide bonds don't qualify as  
19 causing a chemical change in corn steep  
20 liquor.

21 To look at some of the points that  
22 were brought out in the majority opinion, the

1 second one that came out, just before comments  
2 were due here -- and so a lot of us didn't  
3 have time to react to those in written  
4 comments that went in, you had one that asked  
5 whether it was a molecular change. My answer  
6 to that is, no, as I just said, disulfide  
7 bonds are weak interactions that, when broken,  
8 don't change the chemical structure of the  
9 parent material.

10 On point two there, about  
11 structural changes, yes, they definitely do  
12 cause structural changes, that's the  
13 quaternary structure of a protein, and at the  
14 end here, I give a little bit of an analogy  
15 and see if it makes any sense to anybody.

16 But these are not covalent changes  
17 that are occurring here, and the third point,  
18 it goes way beyond what's strictly CSL, and  
19 following down this path of making CSL  
20 synthetic by simple contact with some kind of  
21 substance like this, whether or not it  
22 promotes a chemical change or not.

1           You've got a lot of food products  
2           which have processing aids associated with  
3           them, even within CSL. You've got legitimate  
4           food products that are coming out of this corn  
5           steeping process, corn starch, corn gluten,  
6           corn oil, those are all perfectly acceptable  
7           right now. Are those going to become  
8           synthetic if CSL becomes synthetic?

9           You've got an exact analogy in the  
10          grape industry and grape and wine, where  
11          grapes are treated right up front with sulfur  
12          dioxide. Wine is -- and allowed, it's -- you  
13          know, made with organic wine, you can add the  
14          added sulfates, but all the pumice and must  
15          and lees that are left over from that are  
16          another agricultural input that is exactly  
17          analogous to CSL.

18          Now, are you going to suddenly  
19          rule that that's now synthetic and it's  
20          unallowed in compost production further down  
21          the line?

22          Lots of other things. Sugar has

1 processing aids associated with it.

2 So, in front of you, from all the  
3 public comments that have been made, are a lot  
4 of literature information. There's a lot of  
5 citations. Richard Thur (Phonetic) did a very  
6 good job of providing literature citations for  
7 things. The later stuff that he provided is  
8 more appropriate and more accurate as to the  
9 status of the CSL and steeping industry right  
10 now.

11 But you're looking at steeping,  
12 lactic acid, sulfur dioxide. None of those  
13 literatures really focus on the exact question  
14 that we need to answer here, because we're  
15 looking -- in those cases, the literature  
16 stuff is all looking to improve the yield of  
17 the so-called important products, which are  
18 starch, corn gluten and corn oil, and CSL is  
19 always just a waste product at the end of that  
20 process.

21 So they're not looking at that and  
22 what the impact of any of this process is on

1 CSL itself.

2           Regarding the solubilization of  
3 protein, sulfur dioxide, lactic acid have an  
4 effect in solubilizing protein. There is no  
5 doubt about that, but the breaking of the  
6 disulfide bonds is what solubilizes proteins,  
7 but it's not a chemical change in the backbone  
8 of the protein.

9           So it doesn't really matter which  
10 of the definitions you use, the November 2009,  
11 April 2010, the materials working group  
12 decision tree, they all should be answered  
13 that the contact with SO-2 and/or lactic acid  
14 and breaking disulfide bonds, does not  
15 constitute a chemical change.

16           This isn't semantics. It's the  
17 way the chemistry really is with these  
18 products. That's what chemistry says happens.

19           So I'll quit with that for a  
20 second, and I'll try this analogy, to see if  
21 we can give you a two minute lesson in  
22 chemistry and stuff, for laypeople.

1           If you had a whole bunch of people  
2           in a room here, like we are here now, and  
3           we're all proteins, and if we all link hands,  
4           that's disulfide bridges being formed, and if  
5           you do that, you can't get through the room.  
6           A waiter can't come in and do anything,  
7           because we're all tangled up and messed up  
8           together.

9           You break those disulfide bonds,  
10          put your hands behind your back, people can  
11          weave through, you can get around. I haven't  
12          changed. You haven't changed. Nobody has  
13          changed. We broke the disulfide bonds.

14          We can still make them again. We  
15          can remake them someplace else. We can tangle  
16          them all up again, but there is no fundamental  
17          change in the chemical nature of those  
18          proteins. We're still who we were when you  
19          first started that.

20          And so, that the same that is  
21          happening with corn steep liquor, and the  
22          sulfur dioxide presence there, and I'll stop

1 with that, and see if there is any questions,  
2 which I suspect there may be.

3 MR. GIACOMINI: Questions? Joe?

4 MR. SMILLIE: Thank you.

5 MR. GIACOMINI: Anything further?

6 Jay?

7 MR. FELDMAN: Thanks, Bob. You

8 mentioned covalent bonds --

9 MR. DURST: Yes.

10 MR. FELDMAN: -- and you said these

11 were not covalent bonds, is that your

12 testimony?

13 MR. DURST: Sulfide bonds are not

14 covalent bonds, that's correct.

15 MR. FELDMAN: Okay.

16 MR. GIACOMINI: Further comments or

17 questions? Hearing none, thank you.

18 MR. DURST: Okay, I'm surprised.

19 MR. GIACOMINI: I'm sure that

20 comment will come back.

21 So right now we have Ivan Martin

22 and Richard Wood and Brian Tennis.

1 MR. MARTIN: My name is Ivan  
2 Martin. I want to thank the Board for giving  
3 me the time to give some opinions.

4 I'm with the Natural Acres Organic  
5 in Millersburg, Pennsylvania. My background  
6 has been in the pharmaceutical, until 1999,  
7 actually, even a little later than that.

8 I was in -- changed rabbit and  
9 guinea pig for laboratories. So I started the  
10 organic farm. We have 525-acre farm in  
11 Millersburg. Started in 1999 with cattle, and  
12 then we had up to about 4,000 chickens. We  
13 had one chicken house that had 1,000 chickens,  
14 and actually that house was used for Oprah,  
15 with the California change of law, with trying  
16 to change the law, with again, the chickens  
17 out of cages.

18 My interest really is in better  
19 eggs, and of course I believe that grass is  
20 really something that really we need to get a  
21 better egg. I am working on a combination of  
22 having the chickens out, designing a new



1 building that can do that, and then also to  
2 make a sprouting machine that I can make  
3 sprouts, grow grass six inches high in six  
4 days.

5 So that is what I'm working on.  
6 But my main interest is to have a better egg,  
7 and you know, we are what we eat, and so is  
8 the chicken. So everything is a transfer of  
9 nutrients.

10 And so, I really -- the Board is  
11 doing a good job in getting manmade toxins out  
12 of our food, but I think that the real  
13 challenge is to get better food, and what we  
14 feed nature, our food, what is happening with  
15 -- you know, I think the egg is under attack  
16 right now, that they want to denature it now,  
17 and I'm concerned about that.

18 So on my card, I have: nutrient  
19 enriched food, and God's microlife heals,  
20 man's manipulation destroys.

21 So we have to, I think, really  
22 start zeroing in a little bit on God's

1 microlife, but that we're not getting.

2 MR. GIACOMINI: Questions or  
3 comments? Thank you. Richard Wood, Brian  
4 Tennis, Beth Unger.

5 MR. WOOD: Mr. Chairman, Members of  
6 the Board, my name is Richard Wood, and I am  
7 the founding member of the Wood Burditt Group,  
8 which is a food and drug law firm based in  
9 Illinois, and I am here representing my  
10 client, the International Formula Council,  
11 which is an association of manufacturers and  
12 marketers of formulated nutrition products,  
13 including infant formulas, and whose members  
14 are predominantly based in North America.

15 These comments are given  
16 specifically on behalf of the IFC member  
17 companies who manufacture organic infant  
18 formulas, as well as the non-IFC member, Hains  
19 Celestial, who will speak later today.

20 We're here to comment on the  
21 contemplated change to NOP's policy on  
22 accessory nutrients in foods, as announced in

1 the April 26th memorandum and discussed in the  
2 document, "The use of nutrient supplementation  
3 in organic foods," which is being considered  
4 at this meeting by the handling committee.

5 With five minutes, if I can  
6 achieve two things, I will try to do so. We  
7 have filed written comments, and I would urge  
8 you to read those, but one objective is to  
9 have you understand the counterproductive  
10 effect the contemplated policy will have on  
11 organic infant formula, and two, illuminate  
12 the NOP's flawed interpretation of FDA's  
13 fortification policy, which is sometimes  
14 referred to as 21 CFR 104.20.

15 Some background: the IFC supports  
16 the position of the American Academy of  
17 Pediatrics, that breastfeeding is ideal and  
18 offers specific infant and maternal benefits.  
19 We also agree with the AAP that in those  
20 instances when a mother cannot or chooses not  
21 to breastfeed, iron-fortified infant formula  
22 is the only safe and nutritious alternative.

1                   In other words, breastmilk is the  
2 gold standard, and organic infant formula  
3 should be as near as possible to that gold  
4 standard. Very important point.

5                   I also want to bring to your  
6 attention the definition of infant formula,  
7 because it will be relevant later to the legal  
8 discussion.

9                   In the Food, Drug and Cosmetic  
10 Act, infant formula is defined as food for  
11 special dietary use, solely as a food for  
12 infants, by reason of, one, simulation of  
13 human milk or two, its suitability as a  
14 complete or partial substitute for human milk.

15                   The effect of the change that is  
16 being contemplated and/or proposed is that the  
17 accessory nutrients in organic formula -- if  
18 the accessory nutrients in organic infant  
19 formula are removed, organic infant formula  
20 will be less of a complete substitute for  
21 human milk than obviously, human milk itself,  
22 or regular infant formula, i.e., non-organic.

1 Very important point.

2 Now, I'm going to move to NOP's  
3 misinterpretation of 104.20. Again, we filed  
4 detailed comments, and I would urge you to  
5 read those. It's a five page document, pretty  
6 heavy legally. So those of you interested  
7 could read that at your leisure.

8 But the fact is, the fortification  
9 policy does apply to infant formula. The  
10 policy was established in January 1980 and  
11 applied to all foods, and infant formula was  
12 a food then. It wasn't yet defined in the  
13 Food, Drug and Cosmetic Act, but it is a food.

14 I am not aware, and I have been  
15 involved with the IFC, since 1976. So I've  
16 been through the whole legislative and  
17 regulatory history, and I am not aware of any  
18 statement by FDA, in all the infant formula  
19 rulemaking, that stated that the fortification  
20 policy does not apply to infant formula.

21 Moving to the next point, FDA's  
22 fortification policy is very much broader than

1 interpreted by the NOP in its April 26th memo.

2 The NOP says that D3, which lists  
3 21 nutrients, and those required by standards  
4 of identity, are the only nutrients recognized  
5 by FDA's fortification policy.

6 This interpretation ignores (e),  
7 that is fortification Section (e), which is,  
8 nutrients may be added to foods to avoid  
9 inferiority and (f), which allows any food,  
10 including infant formula, to be fortified with  
11 a nutrient that is permitted or required by  
12 applicable regulations.

13 Applicable regulations include  
14 grass substances, food additives. So in  
15 short, 104 is much, much broader than  
16 interpreted.

17 Finally, last point, FDA, in its  
18 pre-amble to that policy, that said, FDA has  
19 established, in recent years, a number of  
20 regulations that have included one, special  
21 dietary foods. So reference in the preamble  
22 in 1980 to special dietary foods.

1                   The Infant Formula Act was passed  
2                   ten months later. Infant formula became a  
3                   regulated entity, but still a special dietary  
4                   food.

5                   So two points in summary: organic  
6                   infant formula should be as close to human  
7                   milk as possible, and the NOP must have a  
8                   complete and accurate understanding of the FDC  
9                   Act and specifically 104.20, before it changes  
10                  its rules. Thank you, Mr. Chairman.

11                  MR. GIACOMINI: Thank you.

12                  Questions or comments? Thank you.

13                  Okay, Brian Tennis, Beth Unger,  
14                  Dave Carter, proxy.

15                  MR. TENNIS: Thank you. Good  
16                  afternoon. My name is Brian Tennis. I  
17                  represent the Michigan Hop Alliance, and I  
18                  need to preface my comments before I begin by  
19                  saying that I am far more comfortable with a  
20                  beer in my hand than I am with a microphone in  
21                  my face. So if I stumble, I apologize.

22                  Michigan right now has the second

1 highest rate of unemployment in the nation,  
2 trailing only Nevada, and we desperately need  
3 to bring jobs back to our state, not just  
4 temporary jobs, but good-paying and  
5 sustainable jobs as well.

6 Agricultural in my state is  
7 critical, and currently our second largest  
8 industry, generating over \$60 billion for the  
9 state economy and employing over one million  
10 residents.

11 The Michigan Hop Alliance is an  
12 organization that exists to promote  
13 organically grown hops in our region and to  
14 create sustainable jobs for our state.

15 Currently we have five member  
16 growers and 15 acres of certified organic  
17 hops. While most of these fields are not yet  
18 in full production, they will be within the  
19 next season or two.

20 We believe in sustainability and  
21 we strongly believe in the future of organic  
22 beer. Our farms are currently growing some of



1 the most commonly used hops in the industry,  
2 including Cascade, Centennial, Chinook,  
3 Galena, Mt. Hood and Willamette. Next year,  
4 we plan on doubling our acreage and we are  
5 committed to continued growth.

6 We are also part of a sustainable  
7 hop trial that is being facilitated and funded  
8 by the USDA, Washington State University and  
9 Michigan State University.

10 This trial consists of 20  
11 different hops and it was basically put  
12 together to study the feasibility of growing  
13 hops in an organic and a controlled  
14 environment.

15 I can tell you from personal  
16 experience that it is much more expensive to  
17 grow hops organically. It takes a lot more  
18 labor. The yields can be smaller. However,  
19 the quality of the hops that we can produce  
20 right now, will compete with conventional  
21 hops. In fact, some of our hops are already  
22 going into some of the beers in our state's

1 largest breweries, including Founders and New  
2 Holland.

3 This may not come as a shock to my  
4 colleagues, but I've actually sampled that  
5 beer and it's pretty good.

6 Growing hops in our region is a  
7 new venture, but agriculture in my area, up in  
8 north of Travers City, is a primary industry  
9 and it's strongly supported.

10 Hops are helping us to diversify  
11 that area and will assure continued  
12 agricultural prosperity.

13 The Michigan Hop Alliance is  
14 driving the growth in this area. We are ready  
15 to ramp up organic production to meet the  
16 needs of our brewers. We've even recently  
17 traveled to Yakima and spent time with our  
18 friends there, and we understand why hops made  
19 the exemption a few years ago, but we think  
20 that that need truly no longer exists.

21 I am here today to ask you to  
22 remove the blanket exemption on hops and

1 support not only the organic farmer, but the  
2 organic brewer and the consumer as well.

3 We truly want to see the brewers  
4 succeed, because without them, we don't have  
5 the market. We need those guys to make money,  
6 and we need to provide them with the product.

7 We feel that we can actually work  
8 with the brewers and drive the solution for  
9 this.

10 So in closing, we ask you to  
11 please stand behind the organic label and  
12 allow only certified organics to be used in  
13 certified organic beer. Thanks.

14 MR. GIACOMINI: Thank you.

15 Comments or questions? Katrina?

16 MS. HEINZE: Are you in support of  
17 the handling committee recommendation of  
18 January 1, 2013?

19 MR. TENNIS: Yes, I think that  
20 should be fine. We also passed out some  
21 flyers with the 20 different varieties that  
22 we're growing.

1                   But we feel that that is an  
2                   excellent compromise. We can actually work  
3                   with the brewers, if they can tell us what  
4                   hops they need, we can start planting them  
5                   next spring and make sure they are ready.  
6                   Guaranteed.

7                   MS. HEINZE: Thank you.

8                   MR. GIACOMINI: Okay, further  
9                   questions? I think that is it. Thank you.

10                  MR. TENNIS: Thanks.

11                  MR. GIACOMINI: Okay, Beth Unger,  
12                  Dave Carter, proxy, Rob Serrine.

13                  MS. UNGER: Hello, I'm Beth Unger  
14                  from Crop Cooperative. Glad to see you all  
15                  here in Wisconsin, and I hope that you'll all  
16                  attend the reception in your honor tomorrow  
17                  evening.

18                  The first topic I wanted to cover  
19                  today is the animal welfare stocking density  
20                  discussion document, and I want to start off  
21                  by saying that we support a process that such  
22                  standards that have clear goals and fulfill

1 consumer expectations, not standards as  
2 specified management practices.

3 In other words, just let the  
4 farmers manage their farms, and that's a  
5 mantra that you've probably heard from me  
6 before about these outcome-based standards.

7 Well, this has been in the  
8 discussion phase for a while now, and we are  
9 very much looking forward to seeing the  
10 livestock committee bring this to some type of  
11 conclusion and bring a recommendation forward.

12 We want to see these animal  
13 welfare standards that look at the health of  
14 the animal and assessments that focus on  
15 criteria, such as you so well stated in your  
16 discussion document, body condition, lameness  
17 and other scoring factors.

18 You know, I think that, first of  
19 all, organic farmers do an excellent job, by  
20 and large. We know that. We have somebody  
21 out on the farms looking at the animals and we  
22 know that these are very healthy animals and

1 this is a part of the management practices,  
2 rather than having, you know, inspectors come  
3 out on the farms with tape measures, spending  
4 more time, increasing the cost of inspections,  
5 measuring up, you know, is there enough space  
6 here? Is there enough space there? And then  
7 looking at those tables, which was mentioned  
8 earlier, I don't want to belabor the point.

9 There are certain missing  
10 practices, such as tie-stalls and stanchions.

11 So, you know, I can see where you  
12 want to do a chart. I think it would best  
13 serve as a guidance document to certifiers,  
14 not a part of rulemaking.

15 Also, the livestock committee  
16 should consider: what's the desired outcome?  
17 What are you looking to get done with this  
18 recommendation and eventual rulemaking?

19 Hopefully, it will do something  
20 that will replace other forms of third-party  
21 verification that are very costly for farmers  
22 and additional paperwork, such as the variety

1 of welfare standards that are out here now.

2 If that's the case, boy, we're  
3 going to be right behind you on that one and  
4 champion it every step of the way, and --  
5 let's see -- and the other thing I wanted to  
6 bring up is that I want you to remember that  
7 in the NOP's response to the NOSB there was a  
8 number of questions, regarding the discussion  
9 document, that have not yet been answered. So  
10 please take a good, careful look at that.

11 Now for something completely  
12 different. I am going to say something about  
13 the sunset review policy that nobody else has  
14 mentioned, although I've heard some really  
15 compelling remarks today, but I still have  
16 this one little sticking point that was in the  
17 written comments that were posted online.

18 And that is that you can take a  
19 look at materials on the National List, and  
20 the history of what's gone on, with the  
21 intentions of the various National Organic  
22 Standards Boards, throughout history, and

1       there have been cases where I can see that  
2       this policy is a very good policy.

3                 Perhaps a petition came forward  
4       with annotations that didn't end up on the  
5       National List.  Okay, I'm getting there.

6                 There is also the other side of  
7       that story.  There have been petitions that  
8       came through that did not have annotations and  
9       subsequently, during rulemaking, annotations  
10      were applied that were not the intent of the  
11      National Organic Standards Board, and I think  
12      that you're doing a disservice to previous  
13      Boards by not honoring the work that they have  
14      done and considering that.

15                Okay, and I'm saying, boy, when  
16      that comes back to you, please, get a real TAP  
17      review on that one and I would love to see the  
18      USDA support some research on this topic.

19                MR. GIACOMINI:  Questions or  
20      comments for Beth?  Okay, seeing none, thank  
21      you.

22                Dave Carter, Rob Serrine and Robin



1 Allan.

2 MR. CARTER: Okay, welcome to Pet  
3 Food: the Sequel. I'm Dave Carter,  
4 representing the Pet Food Institute and the  
5 organic pet food producers.

6 In my previous segment, I talked  
7 about the overview of the issue of the  
8 importance of trying to move forward with  
9 rulemaking and why these are not accessory  
10 nutrients for pets, but rather, required  
11 nutrients.

12 So right now, I want to talk about  
13 -- there are really three legs of the stool  
14 that we're really sitting on, as we try and  
15 address this.

16 The first of those is where we  
17 talked about -- and Joe, as you asked Miles,  
18 was the timeframe on the rulemaking.

19 The recommendation was adopted by  
20 this group in November 2008, and we're still  
21 anxiously awaiting. We were encouraged in  
22 April, by Miles' comments, that it has moved

1 up on the list, maybe not quite so encouraged  
2 right now as to where it is on that list.

3 I do want to acknowledge, though,  
4 and thank Miles for coming out to Chicago.  
5 PFI had a meeting in Chicago a few weeks ago,  
6 and Miles came out and did address the organic  
7 producers there and I think that that's very  
8 helpful in that communication.

9 Second, though, and this is really  
10 the key area, is the nutrients, and the  
11 recommendation that was made by NOSB in 2008,  
12 there was an addendum with a list of nutrients  
13 that would probably have to be petitioned for  
14 inclusion on the National List.

15 That list was about 12 nutrients.  
16 There has actually been one added since then.  
17 So there is 13 separate nutrients that, if we  
18 don't have another approach, could come in as  
19 petitions.

20 We've already submitted one for  
21 taurine, although at this point, since pet  
22 foods being under the human food regulations

1 under 605, but the NOSB's recommendation was  
2 to move it to 603, it's kind of like, where do  
3 we petition? We came in under 605, et cetera  
4 and so on.

5 But the key thing is to take a  
6 look at another approach. Because these are  
7 required nutrients and because of the 1995  
8 NOSB recommendation of outside authoritative  
9 sources, we have been in discussion with FDA  
10 and the Center for Veterinary Medicine and  
11 just found out this morning that they  
12 communicated with our folks late last week,  
13 that they agree that really, the best thing to  
14 do would be to reference the National  
15 Academies of Science, National Research  
16 Council listing of required or recommended  
17 nutrients for pets, as a category for those  
18 nutrients.

19 I talked previously about AFCCO and  
20 what they require in terms of complete and  
21 balanced formulas, and what AFCCO does is, they  
22 pull that off of the NRC and as I said before,

1 AFCO may be the viable, but NRC is actually  
2 the original stone tablets that it was handed  
3 down on, in terms of what's defined for pets.

4 So what we're recommending is that  
5 the recommendation that was adopted in  
6 November 2008 be amended, so that under the  
7 recommendation for 205-603(b), or as it's in  
8 the recommendation (e), that in addition for  
9 trace minerals used for enrichment and  
10 vitamins used for enrichment or fortification,  
11 that there be, then, sub-paragraph four, other  
12 nutrients when FDA-approved or recommended by  
13 the National Research Council.

14 So it would quantify that list,  
15 and we feel that that would be a way to bring  
16 those in as a category, rather than having to  
17 individually petition.

18 And then the third thing is that  
19 in April, the program talked about the  
20 transition time and doing that through  
21 rulemaking. I know there are some previous  
22 comments here today about a time certain for

1 a transition time. But until the rulemaking  
2 gets done and until we resolve some of these  
3 other issues, we need to continue to work with  
4 the program, to make sure that that transition  
5 time does not cause serious business  
6 interruption for folks who have been  
7 diligently playing by the rules for the last  
8 eight years and trying to manufacture  
9 certified organic pet food products. Thank  
10 you.

11 MR. GIACOMINI: Questions or  
12 comments? I like where you're going with  
13 that. I don't think it will work.

14 The part that I don't think will  
15 work is that certifiers and the program always  
16 want to fall back to AFCO.

17 The substances in the vitamin and  
18 mineral section for AFCO do not necessarily  
19 contain all of the substances in the right  
20 place in their lists, that you're going to be  
21 needing, that you're -- just included by --  
22 from the list of raw materials, of the

1 specific vitamin, the specific mineral, in the  
2 NRC's, because I'm familiar with how NRC's are  
3 written.

4 I am also concerned that you might  
5 not have some appropriate NRC's that you need,  
6 because some of them are very specific to  
7 certain species and some of them are very  
8 generic, and they may not be found to be  
9 appropriate. So just some things you might  
10 need to work on.

11 MR. CARTER: Yes, no, and I  
12 appreciate that. I mean, when you take a  
13 look, and the reason that we're looking at the  
14 NRC, as I said, AFCO relies on that for when  
15 they develop their complete and balanced. The  
16 FDA also uses that.

17 Now, FDA does not have a list, you  
18 know, of nutrients for pets. So what we're  
19 trying to do is say what would they refer to  
20 on that, and that's what CVM is recommending.

21 There is, in the -- if you look at  
22 the tables in that -- I always want to call it

1 NRCS. Too many years of working with the  
2 producers -- the NRC, there is the specific  
3 table.

4 You know, AFCO is not broken down  
5 by breeds in what they recommend. It's broken  
6 down by growth, healthy growth and then adult  
7 maintenance. There are different things  
8 there, as are the NRC tables that they have on  
9 that.

10 MR. GIACOMINI: But when you look  
11 at -- the other thing is, keeping AFCO up with  
12 NRC -- Dairy NRC added chlorine as a mineral  
13 in their 2001 edition.

14 In talking to the Chairman of the  
15 materials section at AFCO, his response to me  
16 was, "Chlorine isn't a mineral. Who looks at  
17 chlorine as a mineral?"

18 Well, it's been in the NRC for  
19 almost ten years. So there is sometimes, a  
20 slower, more deliberative process than even --

21 MR. CARTER: AFCO.

22 MR. GIACOMINI: -- than much of the

1 government.

2 MR. CARTER: Yes, absolutely.

3 MR. GIACOMINI: Anything else?

4 Thank you.

5 MR. CARTER: Okay.

6 MR. GIACOMINI: Okay, wow, the list  
7 changed. Are you current? Is that you?

8 MR. SIMONSON: Yes. Rob generously  
9 offered to change slots with me, because I  
10 have a plane to make.

11 MR. GIACOMINI: Okay.

12 MR. SIMONSON: So Peter Simonson.

13 MR. GIACOMINI: Okay, Peter  
14 Simonson, Robin Allan and Jake Lewin.

15 MR. SIMONSON: First, thanks to  
16 Rob, for changing slots.

17 I am Peter Simonson. I am a  
18 professor of communication at the University  
19 of Colorado at Boulder. I'd like to comment  
20 on hops, and specifically, the process or  
21 procedure through which the handling committee  
22 made their original and then their revised



1 recommendation, with regard to hops.

2 I want to say that I do support  
3 the revised recommendation and the decision to  
4 sunset hops, and I think that the hop growers  
5 testified eloquently and with excellent facts,  
6 with regard to why that should happen.

7 I'd like to comment instead, about  
8 the process and respond, or refer back to some  
9 of the things that were said first thing this  
10 morning, with regard to transparency,  
11 publicness and communication.

12 I know that both the NOSB and the  
13 handling committee are committed to publicness  
14 and public communication and transparent  
15 deliberation, but I'm not sure that in this  
16 particular case, that they lived up to the  
17 standards that I think that they want to live  
18 up to.

19 So, I'd just like to make a couple  
20 of comments, in that regard.

21 The original handling committee  
22 report made reference to what I'm quoting,

1 "Credible public comments that determined that  
2 there is insufficient supply of organic hops,  
3 to serve the brewing industry," and then, and  
4 I also quote, "A significant number of written  
5 and public comments that supported that  
6 position."

7           These comments were nowhere  
8 available on any public site that I could  
9 determine, and so, I emailed, as a student of  
10 public deliberation and communication, to try  
11 to lay hands on those plentiful public  
12 comments.

13           I was referred to the Freedom of  
14 Information Act, which is well enough, except  
15 that the USDA attorney, or an assistant  
16 attorney in the USDA, in November 2008, gave  
17 a presentation that said, and I quote, "The  
18 public does not have to submit a Freedom of  
19 Information request to obtain Advisory  
20 Committee materials."

21           Now, perhaps, I'm wrong, and the  
22 handling committee doesn't count it as an

1 Advisory Committee, but if they do, then there  
2 is a disconnect between what I think the USDA  
3 wants to uphold and what happened in this  
4 case.

5 So, there were references to  
6 public comments, and plentiful public  
7 comments, at that, but no indication that they  
8 existed from this observer of the public. So,  
9 that was troubling to me.

10 In the revised comments -- or I'm  
11 sorry, the revised recommendation by the  
12 handling committee, and perhaps, in response  
13 to public comments that were posted on the  
14 website, the handling committee clarified  
15 their procedure in making the original  
16 determination, and suggested what those public  
17 comments might refer to, and again, I quote,  
18 "Public comment has been received, objecting  
19 to the removal of hops from 205.606.

20 "Four members of the committee had  
21 conversations with 12 or more brewers, three  
22 certification organizations and multiple hop

1 producers and organizations, about the  
2 availability of organic hops, and the  
3 cultivars of hops needed for different brews."

4 Now, I would submit that while  
5 those 12 people may be members of the public,  
6 in this particular case, those were not public  
7 comments. We don't have either the names or  
8 the specific claims made, by those people, and  
9 so, in this instance, we don't have, I think,  
10 the transparency that we would need to be able  
11 to indicate the credibility of the people who  
12 made these claims, or whether they have, you  
13 know, a particular commercial interest or  
14 whatever it might be.

15 And so, I think that in cases like  
16 this, we need to have better access for  
17 members of the public, in addition to  
18 interested parties, to testimony that has been  
19 made about the recommendation, and I submit,  
20 and I know you guys -- you wouldn't be having  
21 this hearing, unless you were interested in  
22 publicness and public comments, but I don't

1 think that in this case, you quite lived up to  
2 it, and I know it's hard, I know you've got a  
3 lot going on, but the stakes are rather high  
4 here, and in this case, we have determined,  
5 with credible testimony from the growers, that  
6 there are plenty of organic hops, and so, it  
7 doesn't look like the investigation in this  
8 case, which was neither fully public nor as  
9 rigorous as it might have been, led to the  
10 facts of the outcome that should have  
11 happened, though I applaud and appreciate the  
12 fact that you changed your original  
13 recommendation and are voting for sunseting  
14 the regulations. Thank you.

15 MR. GIACOMINI: Steve, and then  
16 Joe.

17 MR. DEMURI: I appreciate your  
18 comments. Unfortunately, sometimes the only  
19 way we can get comments is to put out a  
20 recommendation based on the best information  
21 that we have at that point, and then a lot of  
22 people will come out and make comments, like

1       yourself. So, we appreciate that. Were you  
2       at the last meeting?

3                   MR. SIMONSON: No, I wasn't.

4                   MR. DEMURI: Okay, there was a  
5       brewer that got up and made specific comments  
6       to us, that he wanted -- he needed to have  
7       that relisted. That's in the transcript. I  
8       went back and looked at it, after receiving  
9       your comments. It's in the transcripts from  
10      the last meeting.

11                   So, that is part of the public  
12      record, and there are some other people that  
13      we talked to, just as a committee, that  
14      confirmed his statements.

15                   So, but I'm glad you made comments  
16      and I think that the process works.

17                   MR. SIMONSON: Thank you, and in  
18      all due respect, and I saw that, and I'm sorry  
19      I didn't mention the brewer's comments, that  
20      was a singular comment and the suggestion was  
21      that there were multiple credible comments.  
22      So, but point well taken, thank you.

1 MR. GIACOMINI: Joe?

2 MR. SMILLIE: I liked the last part  
3 of your speech the best, where you realized  
4 the load that was on us and the work that we  
5 had to do, and then we finally came up with a  
6 solution that worked for everybody. That was  
7 good. I liked that.

8 Going back from that, there seems  
9 to be a comment that basically, we didn't live  
10 up to our own standards, and I'll just tell  
11 you exactly what happened, and you are  
12 absolutely accurate, in saying that our --  
13 when we came out with our second -- the  
14 revision, that we clarified our procedure,  
15 because we heard your comment and others,  
16 including fellow NOSB members, who said, "Hey,  
17 what were you guys doing on the handling  
18 committee? You know, look at the uproar this  
19 has caused."

20 So, this isn't just about hops.  
21 This is about committee practices and the  
22 workload of the NOSB, and how we may muddle,

1 but we try and get things right.

2 So, basically, that committee is  
3 like, six people. It's one of the committees  
4 that they serve on, and there was an awful lot  
5 of work this particular term. I'm not looking  
6 for sympathy here, although if you want to  
7 give it, that would be accepted, but we had a  
8 lot of work to do.

9 We had a lot of tricky issues.  
10 These are incredibly complex issues. So, what  
11 we, in the committee do is, we sort of divide  
12 it out and we say, "You take the lead on  
13 this," and you know, "If you need help, let us  
14 know," and some things like, for example, the  
15 pectin thing, we really didn't need a lot of  
16 stuff, but we got it. It wasn't  
17 controversial.

18 The hops one, started to get --  
19 whoa, this is getting complicated, and four of  
20 us, four of the six people of that committee,  
21 actually went out and went to their best  
22 sources, to try and get the story.



1                   We thought we had a pretty good  
2                   feedback from the hop growers. I went back,  
3                   I've got the list, because I kept my notes,  
4                   and it's four pages of notes. We went -- we  
5                   didn't go back to a lot of growers, because we  
6                   had their story. That was clear. I wanted to  
7                   hear what the malters had to say, what the  
8                   barley growers had to say, what the brewers  
9                   had to say, the other side of the story,  
10                  because we've got to look at the entire  
11                  industry.

12                  I mean, yes, the hop growers are  
13                  very, very important, but they're not going to  
14                  exist, as they just told you, without the  
15                  brewers. So, we wanted to get their side of  
16                  the story.

17                  They were a little more reticent,  
18                  because they didn't want to come under attack.  
19                  So, sometimes, we had to get opinion, but the  
20                  only way we'd get an honest opinion was to get  
21                  it off the record, okay.

22                  So, they would give us an honest

1 opinion off the record, and we'd factor that  
2 in, and then go back and look at it again.

3 So, in actuality, that's what  
4 happened in our committee. Four of us on the  
5 committee, which is huge, I mean, usually,  
6 it's not that many of the committee can focus  
7 on the one issue. So, four of us went back  
8 and started to compare notes and came back  
9 with some conclusions that, yes, there is lots  
10 of hops out there, but these brewers are  
11 telling us, man, they've got to have these  
12 specific varieties, you know.

13 So, we said, "Okay, let's, you  
14 know, let's keep it going," and that's why our  
15 first recommendation said, "Well, we see some  
16 issues with the petition and we want to keep  
17 it going."

18 Bingo, democracy in action. Open,  
19 transparent democracy happened, as we've  
20 heard, and we're going to continue to hear,  
21 the hop growers are going to make their case.  
22 The brewers are going to start to back out,

1 the certification organizations are going to  
2 make their comments on how they do commercial  
3 availability, and we start to see the whole  
4 picture. We came back, and I think, according  
5 to just about everyone, we've got it right.

6 Resources, how much -- how many  
7 resources did we have? You know, we would  
8 have needed an economic TR to look at the  
9 brewery industry, the craft brewery industry  
10 and really get a real accurate picture. That  
11 would have taken a lot of time, and our  
12 experience with TR is, even on short simple  
13 subjects, it takes forever to get TR's back.  
14 No criticism intended. That's just the way it  
15 is.

16 So, for us to get a TR back, or do  
17 an exhaustive survey is, I won't say  
18 impossible, but we've got so many things to  
19 do, it's pretty improbable that we could do  
20 that.

21 So, we did that best that we  
22 could, on that committee, by going out and

1 getting these opinions, and that's what we  
2 sort of published, you know, 12 ta-da-ta-da's,  
3 and a partridge in a pear tree, and then we  
4 went to public comment and as Steve said,  
5 that's what this is about.

6 So, is the handling committee's  
7 inter-deliberations totally transparent? No,  
8 probably not, but the end result is that the  
9 entire Board votes on something and the public  
10 votes, and we heard their votes and we  
11 responded.

12 So, I think the process works.  
13 We're a volunteer organization, and as people  
14 on this Board know, you know, it's not our  
15 full-time job. It could be, I mean, it could  
16 very well be a full-time job.

17 So, I'm not making this apology or  
18 anything, just for hops. I just want  
19 everybody to know, because we're facing the  
20 same thing with confining, that we heard this  
21 morning, right, the same story, you know, you  
22 guys didn't do a good enough job, you didn't

1 get enough scientific data, to justify ta-da-  
2 ta-da, to the OMB.

3 We're justifying something to the  
4 OMB, that sounds like a full-time job, to me,  
5 and this committee can only go with their gut  
6 and what they feed back from the industry,  
7 because that's what we are, we are the  
8 representatives of certain segments of the  
9 industry.

10 So, we go back, to our industry,  
11 and get their feedback, and I'm going on too  
12 long, but that's the answer to your question.

13 MR. GIACOMINI: Thank you.

14 MR. SIMONSON: No, I appreciate  
15 that and I do think that the procedure worked  
16 out, in the end.

17 I guess the take-away message is  
18 an advocate of the public and the idea of  
19 publicness might be twofold here, that one,  
20 that I respectfully ask that you don't  
21 represent something as having public support,  
22 if the numbers don't exactly add up. One

1 comment does not a public well-spring make.

2 The second is, I think it's  
3 dangerous to get off the record comments, and  
4 represent those as public comments, because  
5 people will say things that will hold up  
6 publicly, and some of the things they say  
7 privately, frankly, might not hold up.

8 MR. SMILLIE: And vice versa.

9 MR. GIACOMINI: Okay, anything new,  
10 on this topic? Jay?

11 MR. FELDMAN: I would just hate for  
12 this conversation to drop. I mean, I know  
13 there's a lot of work on the table, but it  
14 seems to me that I -- the committee did do the  
15 best it could do, you know, given the  
16 circumstances, but are there practices or  
17 processes that could be adopted, that would  
18 improve the process?

19 I mean, you know, watching this,  
20 not having been a part of the committee, it  
21 seems to me that yes, you follow protocol and  
22 procedure, you even put more resources into

1       it, than we typically do, in terms of  
2       individuals working on this, but it may be  
3       that there are things we could do differently  
4       that would at least be perceived by a  
5       political scientist and you know, others --  
6       you know, other folks and the public, as  
7       thorough a process. I just think it's a good  
8       thing to review. I know we have other things  
9       on the table, but I would just throw that out  
10      there, something to consider.

11               MR. GIACOMINI: Kevin, last one.

12               MR. ENGELBERT: Last one. I have  
13      to concur with Joe. I mean, we did the best  
14      we could. There is one thing that could be  
15      done, and that is to have full-time NOSB  
16      members. That's the only way that I see, that  
17      we can really change what it --

18               MR. GIACOMINI: Paid?

19               MR. ENGELBERT: Paid members,  
20      exactly. I don't see how we can do anything  
21      different, given our workloads, the  
22      responsibilities that we have and as we've all

1 reiterated time and time again, there is just  
2 a tremendous amount of work to do, and we do  
3 the best we can, and I applaud the handling  
4 committee for the way that they adapted to the  
5 situation and sought out information, because  
6 we did the same thing, on the livestock  
7 committee, with regard to that.

8 MR. GIACOMINI: Okay, thank you.  
9 We came back from lunch, I believe, an hour  
10 behind schedule. We are now an hour and a  
11 half behind schedule, but our agenda says we  
12 have a break at 3:30. So, let's do that,  
13 3:45, back.

14 Oh, you're right, we had already  
15 caught up. Well, no, but what I'm saying is,  
16 Katrina, we were behind on this schedule of  
17 where we should have been, okay. So, break.

18 (Whereupon, the above-entitled  
19 matter went off the record at 3:40 p.m. and  
20 resumed at 3:55 p.m.)

21 MR. GIACOMINI: Okay, let's take  
22 our seats. Any conversations in the gallery,



1 please, take them out in the hallway, please.

2 Okay, Robin Allan, Jay, and who is  
3 the next one after Robin and Jay, Lisa?

4 MS. BRINES: Bonnie.

5 MR. GIACOMINI: Bonnie just went  
6 by. Okay, go ahead.

7 MS. ALLAN: Okay, my name is Robin  
8 Allan. I'm the Director of Grower and  
9 Livestock Certification for CCOF Certification  
10 Services. We currently certify about 2,300  
11 operations, including approximately 140  
12 livestock operations.

13 So, I'm here today to discuss the  
14 work of the livestock committee, and I want to  
15 thank you, first, very, very much, for your  
16 recommendation to change 205.238(c)(2). I  
17 particularly appreciate that you took CCOF's  
18 comments from the previous meetings under  
19 advisement and developed this very reasonable  
20 recommendation, which addresses the inherent  
21 catch 22 that exists in the current  
22 regulations, regarding animal healthcare

1 products.

2 Secondly, we're also happy to see  
3 the discussion documents on animal welfare.  
4 We fully support the direction of the document  
5 on animal handling, transport and slaughter.

6 In my written comments, I had  
7 posed a couple of specific questions about  
8 applicability, which I'm not going to repeat  
9 here.

10 We do applaud the use of  
11 measurable outcome based standards, wherever  
12 they can reasonably be applied for  
13 consistency, and I would reiterate Beth  
14 Unger's comments, I thought she expressed  
15 those very well on this subject.

16 At this time, I do not have  
17 specific comments on the stocking densities  
18 document, other than to note, I believe there  
19 may be an inadvertent numerical error, in the  
20 amount of space allotted to pigs, I'm a little  
21 concerned about the pigs.

22 It doesn't seem rational to me

1 that a 44 pound pig would get two square feet  
2 of indoor space and one square foot of outdoor  
3 space. One eight pound rabbit gets three  
4 square feet of indoor space and ten square  
5 feet of outdoor space.

6 So, anyway, I'd ask you to look at  
7 those numbers really carefully, and see where  
8 the error is.

9 So, I do also ask that the  
10 committee look at the square footage numbers  
11 being proposed, not just from the mathematical  
12 standpoint, but also, from the common sense  
13 and practical standpoint, before those go too  
14 much farther.

15 I'd also like to state that CCOF  
16 agrees that the NOP standards demand  
17 significant outdoor access for poultry. I  
18 just kind of want to put this on the record.  
19 We're working hard in this area. We're  
20 looking to the NOP guidance for support, and  
21 we have not and we will not ever certify an  
22 operation that just has porches.

1                   And so, if there are corrections  
2                   being made to cornucopia documents, we would  
3                   also like to request that such a change be  
4                   made, and state that for the record.

5                   We have encouraged all of our  
6                   livestock producers to comment to you directly  
7                   on the subjects of animal welfare and other  
8                   relevant recommendations.

9                   However, we do believe in this  
10                  area, that it's essential that the Board reach  
11                  out to the producers pro-actively. We have  
12                  found that the vast majority of the producers  
13                  cannot or do not participate in the process at  
14                  critical times, and often, only become  
15                  involved once it is too late.

16                  My finally comments here today are  
17                  not included in our previously submitted  
18                  written comments, as they're regarding the  
19                  September 30th memorandum to the NOSB from  
20                  Miles McEvoy.

21                  The pressing issue that I am here  
22                  to address is the NOP response to the Board's

1 previous recommendation on GMO vaccines for  
2 livestock.

3 According to the NOP memo, the  
4 recommendation passed at the November 2009  
5 NOSB meeting, to allow GMO vaccines only when  
6 non-GMO vaccines are not commercially  
7 available, cannot be acted at all and by the  
8 NOP, as Miles stated earlier.

9 The NOP has recommended that the  
10 NOSB evaluate GMO vaccines to offer up  
11 criteria and then recommend a listing for  
12 205.603, if it is found to be appropriate.

13 Based on the perceived ambiguity  
14 of the regulations as currently written, it's  
15 important to note that many GMO vaccines are  
16 currently being used in organic livestock  
17 production.

18 Vaccines are an essential part of  
19 preventative animal healthcare and can also be  
20 used to help prevent human diseases.

21 Certifiers and producers generally do not know  
22 how many or which of the vaccines currently in

1 use may be from GMO origin.

2 It's unlikely that many of the  
3 pharmaceutical companies, such as Pfizer, are  
4 willing to voluntarily disclose this  
5 information to the organic livestock producers  
6 or the certification agency in the near term.

7 As exemplified by instances,  
8 such as the recent salmonella outbreak in  
9 eggs, which reportedly could have been  
10 prevented by the use of appropriate vaccines,  
11 it would be disastrous and dangerous to  
12 suddenly yank the approval of untold numbers  
13 of vaccines.

14 Therefore, I strongly encourage  
15 the livestock committee to take the  
16 recommendation of the NOP and immediately  
17 initiate action to ensure that all appropriate  
18 vaccines are allowed to protect the health of  
19 both organic animals and organic consumers.

20 Finally, I request that the  
21 livestock committee carefully consider the  
22 response from NOP about the previous

1 methionine recommendation. CCOF would  
2 strongly support re-listing of methionine  
3 without annotation, if specific -- if  
4 sufficient scientific and economic  
5 justification for the step-down levels  
6 proposed cannot be obtained.

7 We really do not want to see this  
8 recommendation get held up and a major  
9 disruption to the industry occur.

10 I appreciate all that the Board  
11 had done thus far, to ensure that the poultry  
12 industry is not unnecessarily, negatively  
13 affected.

14 I would encourage members of the  
15 committee to contact me at any time, to  
16 discuss any of these issues and I thank you  
17 for your time today.

18 MR. GIACOMINI: Thank you. I'll  
19 start with one question. How could you tell  
20 the problem was with the pigs?

21 MS. ALLAN: I looked at the  
22 numbers. Well, we went through and just

1 started looking and said, "How come a pig only  
2 gets this sheet of paper sized outdoor area?"

3 MR. GIACOMINI: Any other  
4 questions, Kevin?

5 MR. ENGELBERT: I appreciate your  
6 comments, Robin, and we're pressed for time,  
7 but one thing I'd like your opinion on is,  
8 what can be done to get producers to be more  
9 active, until it's too late, because that's  
10 something that really needs to be addressed,  
11 individually and as a group?

12 MS. ALLAN: Yes, we've struggled  
13 with that, also. I mean, I have done direct  
14 outreach to all of our livestock producers,  
15 specific about, you know, this meeting and the  
16 issues, and as far as I know, only two out of  
17 the 140 CCOF livestock producers have  
18 commented, submitted written comments, and I'm  
19 not really sure.

20 I mean, I know that a number of  
21 you are living and located and involved in  
22 communities that have a lot of producers and



1 go to regional meetings and such things. We  
2 see Dan around, you know, sometimes, and I  
3 think that kind of interacting one-on-one is  
4 probably the only way that people are really  
5 going to respond.

6 MR. GIACOMINI: Yes, you know, just  
7 going along with that, and just to, you know,  
8 sort of follow up, you know, as an aspect of  
9 that, without dragging this out, you know, I  
10 can't tell you how many conversations I've had  
11 in the hallways, at this meeting, over the  
12 last four years, regarding the methionine,  
13 asking the poultry and methionine task force  
14 when they would -- if they would come with the  
15 recommendation of what they need, rather than  
16 what they want, and that -- they go, "Yeah,  
17 yeah, yeah," and then they get back with their  
18 group and they come back with another  
19 recommendation of what they want, rather than  
20 just what they need.

21 So, there is -- you know, we'll  
22 see how those things develop, to address your

1 issue on how methionine goes.

2 MS. ALLAN: Thank you.

3 MR. GIACOMINI: Any further  
4 comments or questions? Next, thank you,  
5 Robin. Jake, Bonnie and Liana.

6 MR. LEWIN: My name is Jake Lewin.  
7 I'm the Chief Certification Officer for CCOF  
8 Certification Services. I'm ultimately  
9 responsible for the certification operations  
10 at CCOF. As Robin said, we certify about  
11 2,300 operations in 38 states and three  
12 countries.

13 So, I'm going to try to address a  
14 few issues quickly, and maybe if we're lucky,  
15 forego the proxy.

16 First of all, we would like to  
17 thank you all for the efforts you all put into  
18 the organic community. We really appreciate  
19 all the work that's being done by both the  
20 department and the Board. Things have  
21 actually been pretty good and we're really  
22 impressed.

1                   With regards to hops, we provided  
2                   a bunch of detailed comments regarding our  
3                   experiences and varieties and specifics, and  
4                   we'd invite you to look at those, and we  
5                   basically support the revised recommendation.

6                   As a certifier, we feel that  
7                   consumers -- that hops pose a special  
8                   challenge to consumers, and I'm going to  
9                   invite the Board to examine these products,  
10                  right here, these beers, which I would like  
11                  back.

12                  MR. GIACOMINI: Awful late in the  
13                  day, Jake.

14                  MR. LEWIN: These were selected,  
15                  based on proximity, just what beers I could  
16                  find. They are organic beers. One of them  
17                  identifies the presence of organic hops. The  
18                  other does not, regardless of whether or not  
19                  it contains it.

20                  We find it troubling that because  
21                  alcohol labels don't have required ingredient  
22                  panels, when they contain non-organic

1 ingredients, such as hops, they're not  
2 disclosed. This makes it difficult for  
3 consumers, or anybody else, to make an  
4 educated choice.

5 So, we would ask the Board and the  
6 NOP to consider this, as we move forward,  
7 especially as varieties are petitioned, if and  
8 when that occurs.

9 I was thinking about a clearer  
10 standard could be developed, that required  
11 that any product -- any product, to disclose  
12 the presence of non-organic content, next to  
13 the certifier ID statement, if it isn't  
14 already disclosed elsewhere.

15 We just -- basically, full  
16 disclosure and no organic product should have  
17 a non-organic ingredient in it, without it  
18 being fully available for the person buying  
19 the product, to see.

20 Moving on. With regards to  
21 101(b), we really applaud the committee's  
22 efforts. We realize that there are a few

1 items to be addressed there, but overall, this  
2 is a great -- this is great work.

3 It also serves to align national  
4 and some state guidance that we've received,  
5 and it really, really is fine work, and what  
6 we would ask is the NOP to take it on, with  
7 all seriousness and deliberate speed, to adopt  
8 this -- at least, this guidance or rule  
9 making, as you judge appropriate.

10 So, regarding the made with  
11 labeling recommendation, we basically feel  
12 that this recommendation is at its core a  
13 solution in search of a problem. The effort  
14 and regulatory complexities of enacting and  
15 implementing a labeling change should only be  
16 undertaken for significant and compelling  
17 benefits.

18 We feel that companies wishing to  
19 clarify the organic status of their products  
20 have ample opportunity to do so on the romance  
21 language on their labels, on their websites,  
22 shelf-talkers, whatever they need. We really

1 feel as a mandatory element, this is a non-  
2 starter. As an optional addition, we see no  
3 marginal benefit to its inclusion, and more to  
4 the point, and most importantly, we would ask  
5 that the NOP has got far better priorities to  
6 work on, and we would ask that their time be  
7 spent elsewhere, and therefore, this just be  
8 withdrawn. Anything the NOP does will come at  
9 the expense of something else, and this just  
10 doesn't rate.

11 So, onto a new topic, somewhat of  
12 an old topic. We spent a lot of time talking  
13 about packaging aids, and that originally came  
14 out of a request we made at the Spring 2008  
15 meeting, regarding the applicability of the  
16 100 percent organic labeling claim, when  
17 sanitizers or other processing aides are used.

18 We would actually ask that the  
19 Board and/or the department, take that up  
20 again and clarify, once and for all, what the  
21 requirements are when materials on 605, such  
22 as sanitizers or other materials are used,

1       whether or not that negates the use of the 100  
2       percent claim.

3                   The same conflicting  
4       interpretations and differing uses of this  
5       claim are still happening now, as were  
6       happening in Spring 2008, when we still  
7       brought the -- when we brought this up,  
8       originally. So, we would really ask that you  
9       consider that again.

10                   We have the original comments we  
11       made at that time, should anybody want to see  
12       them or refer to them.

13                   So, bottom line, thanks for all  
14       your hard work and dedication. We really  
15       appreciate it and it really is an honor to  
16       work with all of you.

17                   MR. GIACOMINI: Comments and  
18       questions? Joe?

19                   MR. SMILLIE: Especially, thanks to  
20       CCOF for the really excellent hops comment.  
21       That was right to the point, the whole point  
22       about the alcohol labeling. Just read their

1 comment. It's really -- it really makes it  
2 even more of a problem than it was, and I  
3 think we're going to solve that problem. But  
4 it is good work.

5 The other part of their comment,  
6 that I especially like was the -- your answer  
7 to the commercial availability issue, which  
8 has raised its head again in the hops issue,  
9 about commercial availability and how  
10 certifiers have to deal with it, and I thought  
11 your recommendation and your comments were  
12 really excellent.

13 As far as the made with, well,  
14 I'll let Jennifer tackle that. Yes, the NOP  
15 has got a lot to do, and there are more  
16 important things, but you know, we'll talk  
17 more about this issue in the next three days.

18 The last thing was about the 100  
19 percent. I totally agree with you. I mean,  
20 the NOP, their response to our recommendation  
21 was technically accurate. You know, it lacked  
22 compassion, but it was technically accurate,



1 and we will take it back in the work plan and  
2 go at it again, not me, thank God, but  
3 somebody else. We'll go at it again, until we  
4 get it right, because we really don't -- we  
5 really, you know, believe that our intentions  
6 are good and we'll eventually get to the right  
7 language. At least, we'll get the nitrogen  
8 part done right.

9 And as far as Jake goes, we also  
10 still feel that we do have to go back to the  
11 sanitizers issue, because there is  
12 inconsistency with the 100 percent label.

13 Again, our original  
14 recommendation, I think, is our best one. Get  
15 rid of the 100 percent category, but since  
16 that doesn't seem to be a go, we'll work at  
17 getting it right, at the next meeting. So,  
18 thanks, Jake, for all your comments. They  
19 were excellent.

20 MR. GIACOMINI: Katrina?

21 MS. HEINZE: Thank you for your  
22 comments, Jake. For fear of opening a can of

1 worms here, I will admit that when I was on  
2 the Board and we listed hops, this whole it's  
3 not labeled was not on my radar, all right.  
4 So, different than other food products, it's  
5 not as transparent to consumers.

6 So, I'm wondering, Jake, if you  
7 know, outside of alcohol products, are there  
8 other products that have the same labeling  
9 uniqueness associated with them?

10 MR. LEWIN: Off hand, I can't think  
11 of one, but I also don't see why a proposed  
12 regulation would have to be written, with  
13 regards directly to alcohol. It could just be  
14 general and end up covering it.

15 MS. HEINZE: My question was asked  
16 more in the spirit of opening cans of worms,  
17 as opposed to the solution. Thank you.

18 MR. LEWIN: Right, yes, sorry, I  
19 can't think of any.

20 MS. HEINZE: Okay, well, that's  
21 good.

22 MR. GIACOMINI: Okay, Katrina, that

1 can of worms has been opened before. There  
2 are a number of livestock feed additives that  
3 fall into that category, and the program has  
4 already dealt with that, in language, they  
5 included it in the past year final rule.

6 So, are there any other comments  
7 or questions for Jake?

8 I just have one other comment I  
9 want to make. It's not Jake particular, thank  
10 you, Jake. Going back one, to Robin.

11 We really could not have put  
12 together the 238(c)(2) document without the  
13 work of sitting down with Robin and really  
14 understanding what the exact problem was. We  
15 tried dealing with that in a couple of  
16 different times.

17 So, I guess what I'm saying is, if  
18 you don't like 238(c)(2), it's Robin's fault.  
19 But no, understanding the problem, we could  
20 not have done it without her. So, thank you  
21 very much, Robin. I was very grateful you  
22 were able to come and that I'm able to

1 publicly thank you for all the help on that.

2 Thank you.

3 Next up, Bonnie, Liana and -- who  
4 is that? Oh, Richard Matthews.

5 MS. WIDERMAN: I am Bonnie  
6 Widerman. I'm a sheep and beef farmer from  
7 Crawford County, Wisconsin, and in my spare  
8 time, I'm the Director of Midwest Organic  
9 Services, certifier of 1,300 operations, 644  
10 of which are livestock operations. My  
11 comments today are on animal welfare.

12 At the last NOSB meeting, I  
13 expressed the hope that animal welfare changes  
14 would not take the same route as the past year  
15 rule changes. That is, going into final rule  
16 making, for it would be a long and arduous  
17 process, and I don't believe it's necessary.

18 The NOP clarified, just two weeks  
19 ago, for those who had doubts, that organic  
20 poultry are to be provided outdoor access, and  
21 they referenced the 2002 and 2009 NOSB  
22 documents on poultry.

1           There is a comment period, for  
2           those who object, but I believe we've now been  
3           given enough clarification to call for soil-  
4           based outdoor access for hens, pullets and  
5           broilers.

6           The other tools that we need to  
7           evaluate the compliance of poultry operations,  
8           like stocking densities, door requirements,  
9           whether or not a veterinarian's recommendation  
10          provides a valid reason for confinement, those  
11          can be addressed in the NOP's final -- in the  
12          NOSB's final documents.

13          I believe we need further rule  
14          making on a general level, to call for humane  
15          treatment of organic livestock, in housing,  
16          handling and slaughter, and at the same time,  
17          the NOSB can provide details on what  
18          constitutes humane treatment, so that  
19          certifiers and inspectors have the tools to  
20          assess compliance.

21          It's possible, with our current  
22          livestock standards, to take action on animal

1 welfare violations. My agency has done this.  
2 But having a specific standard is needed for  
3 violations that aren't related to confinement  
4 or nutrition.

5 I'd also like to share my  
6 perspective as a farmer, as to why I don't  
7 believe some specifics that have been put  
8 forth should end up in the standards, but  
9 should be presented instead, as guidelines.

10 One of these has to do with  
11 stocking density. The proposed space  
12 allotment for a ewe and her lamb, and this  
13 also goes for a goat and her kid, is 22 square  
14 feet. I don't know where that number came  
15 from.

16 I allow my flock on pasture, but  
17 for those who do barn lambing, traditionally,  
18 they use lambing pens that are four feet on  
19 the side. This is a 16 square foot area, and  
20 they have the lamb and -- the lambs and the  
21 ewe in there for bounding, for one to three  
22 days.

1                   Now, if these stocking densities  
2                   were in the rule, and I had accidental winter  
3                   lambs, and I put my ewe and my lambs in a pen  
4                   like this, the question is, would I lose  
5                   certification on those lambs, or would I be  
6                   given a non-compliance for my total operation,  
7                   for violation of an organic animal welfare  
8                   standard?

9                   At the same time, if we look at  
10                  this 22 square feet, I don't think it's  
11                  adequate space for a ewe and her lambs, if  
12                  they're going to be kept in a pen, in the  
13                  barn, for any length of time.

14                 So, there is another topic in the  
15                 livestock committee's document, which I  
16                 believe is a good principle for humane  
17                 practices, but I would not want to see it as  
18                 a compliance issue, and that is that of  
19                 temporarily confined livestock needing to be  
20                 able to see others of their species.

21                 Now, bulls and rams may be  
22                 accepted from organic management, however, my

1 bull is also an organic slaughter animal, and  
2 I would like to keep him as such.

3 Now, if this were in the rule, my  
4 bull would lose his organic status, if the  
5 rest of the herd were out on a pasture, where  
6 he couldn't see them, and I really don't want  
7 to ruin some steer's summer by putting him in  
8 with the bull, on the barnyard pasture. I  
9 think the bull should be content with the  
10 company of my rams.

11 The same situation would occur if  
12 I had to bring a cow off a pasture, because of  
13 calving difficulties. Would she lose her  
14 organic status? Would her calf?

15 So, these are the questions I  
16 wanted to raise. Thank you for your  
17 consideration and in closing, I would like the  
18 program to let us know how far they believe  
19 rule making will go in animal welfare issues.

20 MR. GIACOMINI: Questions or  
21 comments for Bonnie? Kevin?

22 MR. ENGELBERT: We hear you loud



1 and clear, and as I stated a year ago, because  
2 I missed the Spring meeting, what I thought  
3 was going to be -- naively thought would be a  
4 simple project, this animal welfare thing, is  
5 obviously turning out to be a very complex  
6 issue.

7 So, we're going to listen to  
8 everyone, and we certainly appreciate any and  
9 all comments that we can receive, even  
10 specific situations like that, because they do  
11 need to be addressed.

12 MS. WIDERMAN: Thank you.

13 MR. GIACOMINI: Joe?

14 MR. SMILLIE: Bonnie, you're a  
15 certifier.

16 MS. WIDERMAN: Yes.

17 MR. SMILLIE: So, you know that if  
18 it's a regulation, it's a regulation.

19 MS. WIDERMAN: I know.

20 MR. SMILLIE: And that's why  
21 speaking as both a livestock person and as a  
22 certifier, your input is very valuable,

1 because you understand that compliance is  
2 strictly compliance.

3 MS. WIDERMAN: Right.

4 MR. SMILLIE: And the letter of the  
5 law is the letter of the law, and if we make  
6 those letters so prescriptive, the certifiers  
7 don't get to exercise common sense. They have  
8 to follow the letter of the law.

9 MS. WIDERMAN: Right, and then it  
10 comes down to the farmer. Last summer, I did  
11 have to get a heifer off the far pasture, and  
12 I run a flerd. I have my sheep, my lambs, my  
13 cows, my calves.

14 Now, because this heifer was  
15 stressed and calving, we were able to separate  
16 her and get her off, but if I had to think,  
17 "Well, I'm taking her out of organic  
18 production, if she leaves the rest of the  
19 flock and the herd," I would do so, because I  
20 wouldn't stress hundreds of other animals, but  
21 it can make a farmer a little angry, too.

22 MR. GIACOMINI: Kevin?

1 MR. ENGELBERT: One quick comment.

2 You have to realize, we're responding to  
3 public input on this animal welfare, and we  
4 initiated this because of the public outcry  
5 and as people learn more about how their  
6 animals are raised.

7 So, you know, we were first told  
8 that we can't do anything about it, unless we  
9 had more prescriptive regulations. So, we're  
10 trying to strike that balance. You know,  
11 we're not just going through this as an  
12 exercise, you know, we're doing our best as we  
13 can, and we're trying to find the right way,  
14 where we need the prescriptiveness and where  
15 we don't, and you know, like I said, we need  
16 all the help we can get.

17 MS. WIDERMAN: Right, but in the  
18 end, it will be the program to decide on it,  
19 so, I would like to hear from them what the  
20 plan is.

21 MR. GIACOMINI: Thank you. Any  
22 more comments and questions? I don't see

1 Miles running to the microphone. So, we'll  
2 just move on. Liana, Richard and Hal.

3 MS. HOODES: Hi, my name is Marty  
4 Mesh. Well, not really. It's me, speaking  
5 for Marty, as the Executive Director of the  
6 Florida organic growers. I don't know if I  
7 want to say that, Joe. I wouldn't go that  
8 far.

9 While I miss being there in  
10 person, I thought I would not be able to make  
11 public comments, I'm grateful for this bit of  
12 time and appreciate Lisa's efforts to make it  
13 happen.

14 I want to first and foremost,  
15 express my appreciation to the retiring Board  
16 members, for their years of work and service.  
17 It seems to be an ever-growing job, or more  
18 aptly, volunteer commitment, that may often  
19 times go under-appreciated by both the public  
20 and industry.

21 Thanks, goes as well, to the  
22 program for substantial progress. It is

1 making dealing with unresolved work and tasks,  
2 enabling the program to move ahead.

3           Concerning poultry issues that  
4 face the industry, my hope will be for clarity  
5 from the program, so that rules of the playing  
6 field are known by all.

7           One thing is sure, not everyone  
8 will be happy, no matter what, but having a  
9 standard that growers are able to meet, that  
10 those consuming the eggs can trust, will  
11 enable this ever-growing segment of the  
12 industry to continue to produce organic eggs.

13           Concerning nano-technology, we  
14 believe that once again, unproven new  
15 technology should be evaluated prior to being  
16 utilized and until they are shown to be  
17 compatible with the principles of organic  
18 production. It seems prudent to proceed  
19 cautiously before allowing them to be  
20 considered for use in organic production.

21           Finally, an update from the okra  
22 growing south, where to our knowledge, no

1 outreach, looking for growers to engage in a  
2 fair contract has ever occurred from the  
3 petitioner or other companies wanting IQF okra  
4 to be included on 205.606.

5 We just wanted to update the Board  
6 on the current status, but will continue to  
7 grow vast amounts of okra in the south, as  
8 well as answer the phone, check the mailbox  
9 and email, in case any company wants to fairly  
10 contract with growers.

11 One additional note, to our  
12 knowledge, the recent okra recall was brought  
13 about because of issues involved with the  
14 breeding ingredients labeling oversight, not  
15 from issues related to growing okra.

16 Okay, here is a good one. If it's  
17 possible, I would like either to add my  
18 remaining minutes to the Seattle time, next  
19 meeting, or hope the Board enjoys getting out  
20 early, as a parting gift to the retiring Board  
21 members who in the past, had to hang around  
22 until the end, or give it to another who may

1 be in need of time, and I do not need his  
2 time.

3 MR. GIACOMINI: Questions? We have  
4 a question.

5 MR. SMILLIE: Well, I know you're  
6 not Marty.

7 MS. HOODES: Thank you, I  
8 appreciate that.

9 MR. SMILLIE: But I would posit  
10 that if okra had gone on 606, the certifiers  
11 would have to invoke commercial  
12 responsibility. The companies that wanted to  
13 make that gumbo would have gone ahead and made  
14 it, and the okra growers of the south would  
15 have had leverage to demand that that contract  
16 -- that company making the gumbo, use organic  
17 okra.

18 They would have said, "Well, can  
19 you give us the farm quality quantity we want?  
20 What do you want?," back and forth. There  
21 would have been a petition to remove okra from  
22 the 606. It would have been removed and we

1 would have had organic gumbo.

2 Right now, we don't have organic  
3 gumbo, because that product never got  
4 launched, because they didn't feel they could  
5 get the organic okra.

6 MS. HOODES: Well, Joe, we know  
7 they could get the organic okra, and it's  
8 better that they didn't go through the process  
9 and waste all of your time over that, would be  
10 my answer to that. There is organic okra.

11 MR. GIACOMINI: Okay, Richard, Hal  
12 and Jackie.

13 MR. MATTHEWS: I'm Richard  
14 Matthews, President NOP Solutions,  
15 Incorporated. I'm here to say that I'm a  
16 strong proponent of removing hops from 606. I  
17 think it's pure folly to believe or to put  
18 producers in the position of creating supply  
19 in the absence of demand.

20 Basic economics teaches us that  
21 demand drives supply. Supply does not drive  
22 demand. That's why I also take exception to



1 the idea that 606 creates supply and demand.  
2 It does quite the opposite. It takes away the  
3 incentive to source organically, the products  
4 that are listed.

5 Moving onto the dairy industry,  
6 the dairy industry, in 2008 and 2009, has  
7 suffered greatly. They're just now beginning  
8 to move out of the perfect storm, a perfect  
9 storm created by four factors.

10 Number one was the Harvey law suit  
11 that created a stampede of organic -- a  
12 stampede of dairy operations to organic.

13 The second one was the  
14 proliferation of non-qualifying mega-dairies.  
15 Both of these created a supply that exceeded  
16 demand.

17 The third factor is the recession.  
18 It hasn't been all bad news for the dairy  
19 producers. They continue to grow, only it's  
20 at a single digit growth, rather than a double  
21 digit growth.

22 So, if supply was actually a

1 driver of demand, we wouldn't have seen  
2 transitioning dairies unable to find a market.  
3 We wouldn't have seen cuts in pay price. We  
4 wouldn't have seen quotas on production. We  
5 wouldn't have seen dairy operations, the small  
6 dairy operations, losing their livelihood.

7 Now, that brings me to the fourth  
8 of the factors in the perfect storm. That  
9 fourth criteria, or factor, also contributed  
10 to a drop in demand. It is the loss of  
11 consumer confidence. That loss was driven by  
12 activists, who harmed the dairy sector.

13 I see, today, that that's  
14 happening  
15 again, and I implore upon the activists to  
16 step back and let Miles do his job.

17 Miles has told us today that he  
18 and his team are dedicated to assuring that  
19 producers -- that certifying agents and the  
20 inspectors that they use are qualified to  
21 perform the job. He has a deputy secretary  
22 who has declared an age of enforcement.

1                   He is blessed with a staff that is  
2 twice the size of what it was, just a year  
3 ago. He has three times the budget. Give him  
4 a chance. Let him work to solve the problems.  
5 Don't trash another sector. It only hurts  
6 small producers. Please, let him do his job.

7                   MR. GIACOMINI: Questions and  
8 comments? Thank you. Hal, Jackie and  
9 Michael.

10                  MR. KREHER: Thank you for the  
11 opportunity for input in the process of  
12 defining organic parameters for egg  
13 production. I can appreciate that this is a  
14 difficult item to address.

15                  My name is Hal Kreher. I'm a  
16 third generation egg producer from near  
17 Buffalo, New York. My grandfather started our  
18 business in 1924. We had chickens in range  
19 production until the late 50's, transitioned  
20 to floor production, then into cage  
21 production, starting in the mid 1960's. We  
22 had a floor building right up until the mid

1 1980's. I grew up helping to care for the  
2 hens in this style production, and heard many  
3 stories of challenges that occurred with range  
4 production.

5           You are hearing from several  
6 different people about the right way to raise  
7 chickens. Some of them have experience  
8 raising chickens. Some of them do not. How  
9 do you pick who to listen to? This is a  
10 difficult question.

11           I recommend that you look to the  
12 scientific research that has been done on this  
13 topic. There are many poultry scientists that  
14 do research on poultry nutrition, breeding,  
15 their health and behavior, housing systems,  
16 etcetera.

17           Much of their research is  
18 published in peer reviewed publications, such  
19 as Poultry Science. Peer reviewed means that  
20 they are more than just someone's thoughts on  
21 paper. They are researched, written and then  
22 reviewed by other scientists.

1 I've prepared a CD for you, which  
2 contains much information on animal welfare,  
3 diseases in chickens and wild birds, and food  
4 safety, among other things.

5 One of the topics covered is  
6 sustainability and the reason for including  
7 this is that the studies done on  
8 sustainability review hundreds of other  
9 studies done by poultry scientists. It's not  
10 exciting reading, but there is much  
11 information there.

12 One find on the disk is a study  
13 done of the use of outdoor range in large  
14 groups of laying hens. It can be found in the  
15 animal welfare and also, the space allowance  
16 sub-directories.

17 The study -- this study addresses  
18 the issue of how many hens use the outside  
19 range at one time, and this study is the basis  
20 for the requirements of the American Humane  
21 Certified outside organic farm requirements,  
22 also included on the disk.

1                   When you read the sustainability  
2 studies, something that should stick out is  
3 that many of the areas have conflicting  
4 studies. So, if the studies have conflicting  
5 conclusions, say, several studies conclude  
6 that raising chickens on pasture is better for  
7 the chickens, and several other studies  
8 conclude that raising chickens on pasture  
9 presents a food safety risk, how should you  
10 resolve that? For me, it comes down to risk.

11                   For food safety, we should strive  
12 to keep risk down. People expect their food  
13 to be safe, especially organic food. To pass  
14 standards that would put consumers at risk  
15 does not make sense. For egg production, the  
16 FDA has developed the egg safety rule, to  
17 reduce the incidence of salmonella  
18 contamination.

19                   Key parts of the rule are bio-  
20 security and proper rodent control, to reduce  
21 the risk of salmonella transmission. Wild  
22 birds can also be infected with salmonella.

1 This is fairly common, and I have included on  
2 the CD several quarterly reports from the USGS  
3 National Wildlife Health Center, which detail  
4 their findings of birds which have perished  
5 from salmonella.

6 These reports also show the  
7 presence of other birds, such as -- other  
8 diseases, such as avian cholera, West Nile  
9 virus and Newcastle disease. I wasn't able to  
10 put that on, because we just heard this, this  
11 morning, but there have been cases in the U.S.  
12 of outdoor flocks of turkeys that have  
13 contracted avian influenza in Minnesota.

14 Back to the concept of risk.  
15 Perhaps, it's okay for a farm that has a few  
16 chickens or a couple hundred chickens, to take  
17 the risk of losing a significant portion, or  
18 their entire flock to disease. They may  
19 choose to roll the dice and have chickens out  
20 on the pasture.

21 For someone who is depending on  
22 the egg business for a significant part of

1 their business, this risk is too great.

2 I think that the way for this to  
3 managed is that they have two-tiered egg  
4 production standard. One set of standards  
5 would apply to free-range production and one  
6 would apply to cage-free, with outdoor access.

7 This is similar to the three-  
8 tiered beef labeling system that has been  
9 proposed by other organizations.

10 There is much more information  
11 available than I have provided on the CD's  
12 that I've handed to Lisa, but I am just one  
13 person, and this type of research review takes  
14 much time. The CD is divided into sub-  
15 directories, each of which has a readme file  
16 that discusses the information contained in  
17 that directory.

18 I would like -- I would also like  
19 to add that the requirement in the animal  
20 handling document for, "Birds should be caught  
21 for loading after they have settled in for the  
22 night," is burdensome, and unnecessary, where



1 light can be controlled or where a farmer is  
2 using birds that do not startle easily, such  
3 as brown birds.

4 I hope that you will take the time  
5 to review this information, before you make  
6 this very important decision.

7 MR. GIACOMINI: Questions or  
8 comments? Seeing none, thank you very much.  
9 We now have Jackie, Michael and Russ.

10 MS. HOCH: Good afternoon. Thank  
11 you for giving me the opportunity to provide  
12 some input on organic tree fruit in the  
13 Midwest.

14 To give you a little bit of  
15 background, my husband Harry and I have a 45  
16 acre organic fruit farm near LaCrosse,  
17 Wisconsin. In the mid 90's, we were  
18 struggling as a conventional fruit farm, and  
19 we found a lot of support from people in the  
20 organic community, to begin a transition to a  
21 certified organic fruit farm. Many of the  
22 people who are here today, helped us.

1           In doing that, we saw that we had  
2           the support from the organic community, but we  
3           also needed to have some support within the  
4           fruit growing community, and again, we worked  
5           with a lot of people to develop a group called  
6           the Organic Tree Fruit Association.

7           That association is a relatively  
8           new association. So, I'm not sure that you're  
9           aware that that group exists. Who we are is,  
10          we're a non-profit grower based member  
11          organization that is dedicated to serve the  
12          interests of organic tree fruit.

13          We have over 50 members. OTFA  
14          also has a listserv that is open to people  
15          beyond the grower members, and we have over  
16          700 members that are involved with that  
17          listserv, and those include people worldwide.

18          We are primarily focused on  
19          organic tree fruit production and the majority  
20          of the growers are either certified organic or  
21          highly interested in becoming certified  
22          organic. The focus of the group is education,

1 research and advocacy.

2           So, in the education component, we  
3 do seminars, field days. We have a quarterly  
4 news letter and various other educational  
5 things, where we have a website and we put out  
6 fact sheets. The Midwest organic MOSES is  
7 very good at helping us develop in our  
8 infancy.

9           Research, we're working on  
10 specific challenges that we see growing fruit  
11 in the humid Midwest locations. I'm here  
12 today to speak a little about the advocacy  
13 component. I'm a little nervous. This is the  
14 first time I've been to this meeting, and so,  
15 again, another learning curve.

16           But one issue that has some  
17 concern to us is the issue related to the  
18 issues being discussed by the crops committee,  
19 related to the antibiotic use in fire blight  
20 control.

21           I realize that the crop committee  
22 felt it necessary to have more updated

1 technical information on other alternative  
2 treatments to streptomycin before completing  
3 its review, and that they are deferring their  
4 vote. We appreciate the careful thought and  
5 the deferred vote.

6 We'd like the NOSB to consider the  
7 following items, when they're discussing fire  
8 blight control in the future.

9 Strep occurs naturally. That's  
10 the first point. The second point is, taking  
11 antibiotics out of an animal food system makes  
12 scientific sense, but not necessarily in the  
13 plant, apple, pear food production system.

14 There is no scientific connection  
15 between field applied strep and human  
16 pathogenic resistance. Strep could be  
17 detected in the plant for only three to four  
18 days and is applied only about 75 days before  
19 the harvest.

20 The third point would be, growers  
21 can do many things to decrease the risk for  
22 fire blight, such as cut out blight in the

1 orchard as much as possible during winter,  
2 scout and remove current strikes, focus on  
3 fire blight resistant root stocks and  
4 varieties, although that focus on fire blight  
5 resistant root stocks and varieties isn't  
6 necessarily that resistance isn't as true as  
7 people might assume.

8 In 1996, there was a perfect storm  
9 that had the right temperature, that had the  
10 right wetness, that had the right mode of  
11 entry, it was during blossom, and many trees  
12 were destroyed in Southwest Michigan, even  
13 though they were considered to be fire blight  
14 resistant. So, there is challenges there.

15 The fourth component is really the  
16 computer modeling and post infection sprays.  
17 That's the one sure way to prevent a serious  
18 loss due to fire blight infection.  
19 Streptomycin is an important post infection  
20 control, especially on the highly susceptible  
21 young dwarf orchards.

22 As a group, we support the

1 continued use of strep for fire blight  
2 control, but we also feel that antibiotics  
3 should be restricted to only post infection  
4 application on high risk orchards, after an  
5 infection has been verified. We do not feel  
6 that calendar prophylactic applications of  
7 antibiotics -- we feel that calendar  
8 applications should be prohibited, just post  
9 infection on high risk orchards. Thank you.

10 MR. GIACOMINI: Thank you. Any  
11 comments, Kevin?

12 MR. ENGELBERT: Thank you very  
13 much. What would happen to you and your farm,  
14 and others in your area, if those were allowed  
15 to sunset, period, and two, if you had a sign  
16 in your farm stand, or your farm driveway,  
17 stating that you use antibiotics, tetracycline  
18 on your fruit trees, what would that do to  
19 your business?

20 MS. HOCH: The first question would  
21 be related to what would happen.

22 In the past four years, we have

1 not used streptomycin on our orchard, but five  
2 years ago, we did not use streptomycin and we  
3 lost a five acre block of honey crisp, due to  
4 fire blight.

5 But my husband basically says, if  
6 we don't have streptomycin, we can't continue  
7 to plant and orchard, and the reason being  
8 that a small orchard, the young trees are the  
9 most susceptible to the disease. The larger  
10 trees, I can deal with the fact that I might  
11 lose part of a tree, but if I spend money on  
12 five acres of honey crisp and lose them all,  
13 because I had the right temperature, the right  
14 wetness and I had a wind event that tore up  
15 the leaves, I had the mode of entry for the  
16 bacteria and lost that, it makes it very hard  
17 to think about investing in that for my  
18 orchard.

19 So, his comment would be that we  
20 wouldn't plant more trees. I might argue with  
21 him and tell him, we'll struggle along and we  
22 might plant more trees, because I like what

1 I'm doing, but that would be his comment.

2 Another comment from a grower in  
3 Michigan, who has 125 acres is, if he doesn't  
4 have the availability of strep, he will drop  
5 the organic certification and he will go with  
6 an equal label. I don't know that to be true,  
7 but that's what he said in his passionate  
8 response to me.

9 The comment about what would our  
10 customers say if we use strep, we have told  
11 the customers that sell to, we're primarily a  
12 wholesale orchard. At least three of the  
13 stores know that this is a concern of ours,  
14 and have -- they have said that they'll do  
15 what they can to help us keep this product  
16 until we find a better product to deal with  
17 the post infection issues.

18 MR. GIACOMINI: Kevin?

19 MR. ENGELBERT: One follow up. Do  
20 you know of any research that's being done for  
21 new products? Has there been any progress,  
22 since the last time the crop committee dealt



1 with these?

2 MS. HOCH: I know that there is  
3 ongoing research. I'm sorry that I can't give  
4 you the specifics of that research. I know  
5 George Sundin, from the MSU has had a lot of  
6 information, and I don't have that information  
7 with me today.

8 But we are looking at other  
9 options. I know -- I believe that if we have  
10 a different option, it would be -- I would be  
11 willing to consider that as a possibility.

12 MR. GIACOMINI: Other comments?  
13 Seeing none, thank you very much, Jackie.  
14 Next up is Michael, Russ and Dean.

15 MR. COX: Okay, my name is Michael  
16 Cox. I'm with Arkansas Egg Company, and I did  
17 have a speech prepared. I hope to get a copy  
18 of it, in your hands, but I think I'll just  
19 take a little bit of that and some comments  
20 that I've put together from what I've seen so  
21 far today.

22 We are an organic egg operation in

1 Sommers, Arkansas. We are fully integrated  
2 and dedicated organic, with 150,000 layers.  
3 We've been certified organic for three years  
4 now.

5 I'd like to start by quoting the  
6 second purpose outlined in the Organic Food  
7 Production Act, and I quote, "To assure  
8 consumers that organically produced products  
9 meet a consistent standard," and I think  
10 today, as an industry, as an egg industry, we  
11 could not be further from meeting that status  
12 and I think to maintain the integrity and to  
13 ensure the future of the program, we have to  
14 strive to meet the framers intent.

15 I'm going to address some -- just  
16 some general information on spacing and  
17 outdoor access, and I'll close with that.

18 Basically, on spacing, there is a  
19 wide variety of options due to the lack of a  
20 standard being set, as far as the amount of  
21 space a bird can have inside.

22 When I first was looking to get

1       into the industry, you know, the difference  
2       between an aviary and a colony system could be  
3       one square foot, all the way to one and three-  
4       quarters, you know, and what does that mean,  
5       in terms of production cost?

6               Well, when you do the math, it  
7       turns out that that's about -- you know, it  
8       could be up to 80 cents a dozen, and that  
9       represents nearly a 100 percent difference in  
10      the cost to produce that naked egg, from one  
11      complex to the next, and you know, that's  
12      clearly, out of context with the purpose of  
13      the Organic Food Production Act.

14             You know, the committee  
15      recommendation of one and a half square feet  
16      to bird, I think is a good one. I think that  
17      that's one that the majority of producers  
18      could comply with, without unmanageable costs  
19      being added onto our cost of production, and  
20      I think the majority of the industry could  
21      adopt to that. Of course, aviary systems  
22      would not, and you know, people have their own

1 opinions on those.

2 I think the cost to the consumers,  
3 I know that was a point brought up early this  
4 morning, with the cornucopia group speech. I  
5 think the cost to consumers would not rise,  
6 very much.

7 We already have a national co-op  
8 brand, distributing and selling nationwide,  
9 with more than the current guidelines or  
10 suggestions, more than 1.5 and more than two  
11 to three square foot outside.

12 So, I don't think that the cost to  
13 producers -- or the cost to consumers is  
14 anything to fret about.

15 I'm going to move onto outdoor  
16 access. We firmly oppose pullets having  
17 outdoor access. We think that they are too  
18 vulnerable. We think it would be  
19 irresponsible. They need the vaccinations for  
20 a healthy start, so that they can live their  
21 outside lifestyle that the standards require,  
22 and the vaccination process goes on well

1 through the end of growth cycle in the pullet  
2 house.

3 We firmly believe that layers  
4 should have access to outdoor access. You  
5 know, the mentality of the industry is kind of  
6 the opposite of that, but we believe that you  
7 know, if welfare didn't matter with this  
8 program, then why don't we just put them in a  
9 cage and feed them organic feed?

10 You know, birds do like to go  
11 outside when they're given the opportunity,  
12 but it's just that, an opportunity, and the  
13 very word 'access' is probably the most  
14 limiting factor. You know, whether you have  
15 one door at the end of a house or whether you  
16 make it opportunistic for the birds to  
17 outside, that's a huge factor, and there are  
18 increased risk with birds going outside. But  
19 you know, what's made this industry attractive  
20 to so many of us, you know, and in some cases,  
21 it makes up -- you know, it's 15 percent of  
22 our production and 25 percent of our sales,

1 and I say that as an industry.

2 You know, it's an attractive  
3 industry to get in, and there are associated  
4 risks, and we knew those risks, going into it,  
5 and the benefits outweigh the risk.

6 As far as the issue of predators,  
7 I mean, there is nobody saying that we're  
8 going to put them outside and then close the  
9 doors. The birds can come and go as they  
10 like, and if we really cared that much about  
11 them, honestly, we wouldn't be scheduling  
12 their slaughter dates at 80 weeks.

13 So, I think it's just another  
14 calculated risk that we take. You know, I  
15 think that consumers do expect birds to go  
16 outside. I think that's an example of where  
17 we're the furthest out of context with what  
18 the consumer perceive to get in a product and  
19 actually, what we deliver to them.

20 We also operate a pastured organic  
21 egg operation, and we have birds that go as  
22 far as 350 feet, and there's a fence there,

1 they might go further. I think it's all in  
2 relation to, you know, what you try to  
3 accomplish as a producer.

4 I mean, producers are you know,  
5 very cleaver, and instead of working to bend  
6 the rules, I think we need some enforcement,  
7 so we can work to operate within the context  
8 of their -- of the framers intent, and I'm out  
9 of time.

10 MR. GIACOMINI: Comments and  
11 questions? Seeing none, thank you very much.

12 MR. COX: Thanks.

13 MR. GIACOMINI: Next up, Russ.  
14 Russ and then, Dean and Suzana. Go ahead.

15 MR. KLISCH: All right. I am Russ  
16 Klisch and President of Lake Front Brewery.  
17 I'm also the owner of -- and founder, it  
18 started in 1987, brewing about 50 barrels a  
19 year, and growing it ever since. This year,  
20 we'll go about 1,500 beers -- or 16,000  
21 barrels, excuse me.

22 Throughout the beginning, we've

1 always felt we've been an innovative brewery.  
2 We've done all those different things with our  
3 stuff. I've packaged the first fruit beer in  
4 the country. I made the first gluten free  
5 beer.

6 We've also been the first organic  
7 brewer in the country, that's brewed our beer  
8 underneath our label, back in 1996, and I'm  
9 here, just to talk about trying to take hops  
10 off the National List, right now. I'll try  
11 making it brief.

12 But we make a lot of different  
13 types of beer. I brought a bunch of different  
14 ones here. We make American Red Ale. We've  
15 got some brown, if you want. We make a French  
16 country ale, and we make a dare-devil ale,  
17 right here, from Evel Knievel. I've got an  
18 organic beer, right here. This is the  
19 original line. We made a beer all with  
20 Wisconsin ingredients, growing with our  
21 Wisconsin hops. I keep on seeing Oktoberfest.  
22 Our wheat mount beer, our pilsner, holiday



1 beer, IPA and a pumpkin beer, and every one of  
2 these beers can be made with hops, organically  
3 made right now.

4 And so, there is no problem at  
5 all, making beer with organic hops, of any  
6 different styles or types that we have, and  
7 that's basically my main message here, that I  
8 was suppose to have.

9 I think there is a very bigger  
10 problem, making it with malts, different  
11 malts. You can't make smoked beer. You can't  
12 make certain weis beers, other things out  
13 there. There's other ingredients that, but I  
14 really don't -- don't really understand why  
15 you want to -- bring out malt, as targeting,  
16 as being the one thing that you want to have  
17 organic on there, because all brewers are  
18 doing right now, are literally, have it on  
19 their labels, because the gentleman talking  
20 before, he was up here, talking about non-  
21 organic ingredients.

22 So, right on the label, made with

1 organic malt, hops, and everybody thinks  
2 that's organic malt and hops, but it's not,  
3 right now. That's the way they have it  
4 worded.

5 To me, it just cheapens the seal  
6 out there, when you have certain ingredients  
7 on certain products, that are not made  
8 organically, and that's what I'm here to tell  
9 you. So, I'm done. Do you have any  
10 questions? Yes?

11 MR. SMILLIE: What are the hops  
12 used in the pilsner?

13 MR. KLISCH: In the pilsner?

14 MR. SMILLIE: Yes.

15 MR. KLISCH: Usually, it's like a  
16 Czechoslovakian style -

17 (Simultaneous speaking.)

18 MR. SMILLIE: I talked to a couple  
19 of brokers and a couple of hops dealers, and  
20 they said there are certain hops that they  
21 really believe would be very, very difficult  
22 to grow organically, because of low yields and

1       susceptibility to fungus, and it seemed to be  
2       -- they seemed to be more about the pilsner  
3       ones, than the ale ones, like -- is that your  
4       experience? I take it, it isn't.

5                   MR. KLISCH: No, in fact, when I  
6       first started in 1987, the only type of hops  
7       you could find were German and Holland-towers,  
8       because that was the only one that was really  
9       making organic hops, was -- they came from  
10      Germany.

11                   So, that was kind of surprising  
12      for me to hear.

13                   MR. GIACOMINI: Questions? Seeing  
14      none, okay. Thank you.

15                   MR. KLISCH: Sure.

16                   MR. GIACOMINI: And then, go ahead.  
17      Dean and then Suzana and Renee.

18                   MR. DICKEL: Hi, my name is Dean  
19      Dickel. I own and operate New Century Farm  
20      organic eggs, here in Shullsburg, Wisconsin.  
21      The Madison area is one of our main markets.  
22      I was up today, delivering eggs. So, this is

1 my every day working clothes, today.

2 I'm here to talk about the outdoor  
3 access for poultry. Probably echo some of the  
4 sentiments of our colleague from Arkansas,  
5 actually, as far as -- we've been going with  
6 the 1.5 square feet indoor space. I think  
7 that's a pretty nice compromise.

8 When I started, I was first  
9 certified when the rule was first passed, the  
10 first chance you could get organic seal on a  
11 carton of eggs, we put them on, for marketing  
12 here in Madison.

13 The reason why I wouldn't go any  
14 higher than 1.5 square feet is, we have to  
15 deal four months out of the year. We have  
16 chance, in this part of the country, that we  
17 could have to deal with 40 degree below zero  
18 wind chill factor, and we depend on the birds  
19 to provide a lot of the heat.

20 My customers want they outdoor  
21 access, but they also want us to be conscious  
22 of energy usage. On our farm, we try to limit

1 the amount of LP gas that we use in the  
2 chickens, and so, that becomes a big factor  
3 for us, in the winter time. In the summer  
4 time, we use all natural ventilation. We like  
5 the idea that the chickens can go outside. We  
6 actually have about nine to ten square feet of  
7 outdoor access space, that's just kind of what  
8 we had room for and but I think our customers  
9 expect that during those parts of the year,  
10 that our chickens should be outside.

11 I also agree with on pullets, six  
12 months and under, one of the practical  
13 concerns with pullets is getting them to nest  
14 train. We tried an experiment with pasture  
15 raised chickens, with a hoop house outside and  
16 we had beautiful pasture there, and the first  
17 thing the chickens wanted to do was lay their  
18 eggs all over the place and in the mud, and  
19 so, we started shutting them inside, and  
20 decided to get them nest trained and we  
21 discovered that they really don't eat very  
22 much grass, and then we had to haul all the

1 feed out to them and all the eggs back, and  
2 so, our compromise is to have -- I guess  
3 they're calling it moon-scape or a dirt lot,  
4 or whatever.

5 But we just got to have a place  
6 where we can find -- I tell my people when  
7 they're out, looking outside for eggs, if you  
8 didn't know that egg was there yesterday,  
9 don't pick it up and put it in, because egg  
10 safety is going to be paramount with this  
11 salmonella thing. So, that's a practical  
12 concern.

13 One possibility, I was thinking  
14 of, for people that are building new  
15 construction, to include in the rules that new  
16 construction should be pre-certified, that you  
17 ought to know ahead of time, what your  
18 requirements are going to be and go ahead and  
19 have a certifier come out and look at your  
20 plans or look at your building and make sure  
21 that it's going to meet the organic standards,  
22 before you start putting chickens in and

1 putting an organic label on the products.

2 The two other issues, quick, we've  
3 been following the methionine thing for a long  
4 time. I've tried replacements. The one idea,  
5 people say, we'll just use more soy beans and  
6 the practical thing about that is if you feed  
7 a higher protein or ration to the chickens,  
8 you're going to end up with more ammonia  
9 inside in the winter time, and I just don't  
10 know any way to -- we've tried the high  
11 methionine corn, it feeds real well, but we  
12 had production problems with corn out in the  
13 field. We grow our own feed. So, that was -  
14 - and we were still interested in trying that  
15 avenue, to see if we could cut back on the  
16 methionine or eliminate it.

17 Another one is on beak trimming.  
18 This was -- I've been involved in that, even  
19 before there were organic certification. I've  
20 raised chickens both way, beak trimmed, not  
21 beak trimmed, and in my opinion, feeling the  
22 beak trimmed chicken is inhumane treatment

1 that catastrophe can have, if something goes  
2 wrong. It's way more inhumane than the actual  
3 beak trimming that you do.

4 So, those are the only comments I  
5 had and I can take any questions, if you --

6 MR. GIACOMINI: Questions? Kevin?

7 MR. ENGELBERT: I didn't hear you  
8 say how many birds you have, how many layers  
9 you raise?

10 MR. DICKEL: Our barn holds 6,000  
11 chickens. It's a 9,000 square foot barn,  
12 6,000 birds.

13 MR. ENGELBERT: Thank you.

14 MR. GIACOMINI: Jeff?

15 MR. MOYER: Yes, Dean, you brought  
16 up the question of methionine. How much are  
17 you using in your feed now and how much can  
18 you live with?

19 MR. DICKEL: It's included in my  
20 pre-mix. I used to know the exact percentage,  
21 it's like a .025, or something like that.

22 MR. GIACOMINI: That's percent of



1 methionine, right?

2 MR. DICKEL: It's according to NRC  
3 recommendations.

4 MR. MOYER: Thank you.

5 MR. GIACOMINI: Further questions?  
6 Okay, thank you. Next is Suzana, Renee and  
7 Urvasni.

8 MS. RAKER: My name is Sue Raker.  
9 Thank you for the opportunity to address this  
10 Board about organic bee keeping, farming and  
11 apiculture. My husband and I own and operate  
12 a certified organic farm, located in  
13 Michigan's upper peninsula, almost directly  
14 overlooking Lake Superior.

15 We have been farming organically  
16 and keeping bees for over 25 years. Our farm  
17 is certified by MOSA and we're also proud to  
18 be members of the grower poll, members of  
19 Organic Valley Crop Cooperative.

20 The proposed standards are  
21 overall, very much in keeping with simple  
22 observation and logic in assuring that honey

1 bees and honey product are as free as possible  
2 from toxic substances.

3 The appeal of honey to consumers  
4 is primarily that of being a pure and natural  
5 substance. It is my belief that if the public  
6 were aware that over 90 percent of the honey  
7 sold in the United States contained  
8 Terramycin, tylosin, sulfa, fluvalinate, as  
9 well as other assorted antibiotics,  
10 pigmidicides and even honey analogs, an outcry  
11 would ensue that would make the Alar apple  
12 concern pale, in comparison.

13 But perhaps, this needs to happen.  
14 Honey bees are in trouble and much of it has  
15 been caused by human interference and  
16 management.

17 Weaken colonies are fed anti-viral  
18 medications and exposed to antibiotics and  
19 pesticides and then, become susceptible to  
20 development problems, as the supposed remedies  
21 are applied and again and again.

22 The days of toss it and leave

1 applications of medicine are done, and good  
2 riddance.

3           During my travels in Europe and  
4 Canada, my believe that biologically sound bee  
5 keeping is vital, but also, requires positive  
6 practices and active involvement of the bee  
7 keeper, in the entire cycle of bee life and  
8 behavior, were strengthened.

9           A commercial bee keeping  
10 enterprise in Sweden or Austria is usually  
11 comprised of 60 to 100 colonies. These bee  
12 keepers are not referred to in derogatory  
13 terms, as side-liners, but are seen as full  
14 fledged agricultural participants.

15           My own experience has led me to  
16 believe that one person cannot adequately tend  
17 more than 150 hives and do it utilizing  
18 organic methods.

19           Currently, my apiary has 47 hives,  
20 had 62 this season, and that is plenty of  
21 work, when other livestock and chores demand  
22 attention. But I believe that non-toxic bee

1 keeping, including organic, encourages one to  
2 become a better bee keeper because of the  
3 requirements for record keeping, monitoring,  
4 labor intensive watching the bees, instead of  
5 simply dumping pallets of hives and inserting  
6 pesticide strips, plopping on two honey supers  
7 and walking away, and that's what currently  
8 happens with the large operations.

9           The process of being a real bee  
10 keeper involves constantly learning, being  
11 aware and often, even experimenting. Many of  
12 the suppliers of bee equipment now carry non-  
13 toxic materials for disease and mite  
14 prevention, that were unheard of in this  
15 country five years ago.

16           Eminent entomologists, such as  
17 Larry Connor, have emphasized regional  
18 breeding and adaptive behavior selection in  
19 queen raising, rather than purchasing queen  
20 bees from hundreds of miles away. In that  
21 respect, the organic movement has brought  
22 about a sea change in how solving insect

1 pollinator problems can be accomplished, and  
2 I believe the committee that worked on this,  
3 the task force and this Board, you give  
4 yourselves deserved credit for these changes.

5           Emphasizing the over-wintering of  
6 bees is part of this. In the area where I  
7 live, there are thousands of acres of forest  
8 and swamp land, which provide a buffer zone  
9 for my bees to avoid exposure to urban  
10 pollution sources. The trade off, long  
11 winter, high winds, huge snow falls and short  
12 field seasons.

13           Each bee keeper must make location  
14 adaptations to their own situation. There is  
15 no right answer. There is no magic solution  
16 to organic bee keeping, in every location, for  
17 all the dilemmas of raising honey bees, there  
18 is only one admonition, pay attention.

19           I am strongly supportive of  
20 measures to be taken to strengthen genetic  
21 traits locally and doing everything possible,  
22 to assure colonies are over-wintered

1       healthily, rather than simply purchasing  
2       replacements. They are livestock. Would a  
3       competent dairy farmer ever dispose of cattle  
4       simply because it was winter?

5                   My experience has led me to  
6       believe that utilization of certified Russian  
7       queens, every three years and approximately  
8       one-third of my hives, or less, assures  
9       introduction of desirable traits, while  
10      maintaining local adaptation, that is, that we  
11      raise our own queens, much of the time.

12                   On the matter of hive materials, I  
13      do feel very strongly that no plastic  
14      foundation should be allowed, whether it is  
15      sprayed with wax, as described, or not. The  
16      wax serves much the same purpose to honey  
17      bees, that our lever serves to us.

18                   German research and sources in  
19      particular, have cited the retention and even  
20      migration of undesirable substances in the  
21      comb. Additionally, bees typically open  
22      travel and communication holes in the comb, as

1 needed and then fill them. Plastic foundation  
2 prohibits this continuous re-forming of the  
3 comb, and seems to hinder both bee health and  
4 efficiency.

5 Storing supers, wax foundation and  
6 other hive equipment requires preventative  
7 measures against the presence of wax mode,  
8 mice and other pests.

9 MR. GIACOMINI: Okay, can you wrap  
10 up? Your five minutes is up.

11 MS. RAKER: Yes, I've used a  
12 variety of botanical's and also herbal oils,  
13 particularly peppermint, and you have a copy  
14 of this, so, you can ask me questions later.

15 Finally, I come to the most  
16 important part of the proposed regulation,  
17 enforcement. My own State of Michigan is  
18 broke. They are beyond broke. The Department  
19 of Agriculture in Michigan does not regard any  
20 enforcement of NOP standards to be their  
21 responsibility and they will not attend when  
22 there are complaints raised. Instead, they

1 are relying upon Federal investigation  
2 enforcement and certification.

3 Matters of fake organic claims  
4 have emerged that include fake certificates,  
5 deceptive labeling, even a speech given a  
6 state wide bee keeping meeting about how to  
7 sell your organic honey as -- or how to sell  
8 your honey as organic, without being organic,  
9 by a bee keeper, so-called, who sells honey,  
10 but has no bees herself.

11 MR. GIACOMINI: Okay, thank you.

12 MS. RAKER: This is -- okay.

13 MR. GIACOMINI: Can you wrap that  
14 up, please? Thank you.

15 MS. RAKER: You can read this.

16 MR. GIACOMINI: Okay.

17 MS. RAKER: Any of you want to get  
18 in touch with, my address and phone number is  
19 on there.

20 MR. GIACOMINI: Okay, Joe?

21 MR. SMILLIE: Thank you for that.

22 That was very interesting.



1                   One of the things that we're  
2                   talking about is the area 66, is it 66?

3                   MS. RAKER: One-point-eight.

4                   MR. SMILLIE: One-point-eight  
5                   miles.

6                   MS. RAKER: And then two miles  
7                   beyond that.

8                   MR. SMILLIE: Yes, how is that  
9                   going to work? Is that going to work for you?

10                  MS. RAKER: You get an areal  
11                  photograph, they'll give them to you for free,  
12                  at NRCS or FSA. Get you place, get your  
13                  neighbors, get the whole area, then get a topo  
14                  map, then get a plat map, starting filling in  
15                  what's public land, what's open and I'll tell  
16                  you something, nothing beats a personal  
17                  appearance.

18                  I have people I've had to get  
19                  affidavits from on something, and you take  
20                  them a jar of honey and you start talking to  
21                  them about organic and organic feed and  
22                  organic bees, and you remember them at

1 Christmas and put a little candle and a little  
2 something in their mailbox, I mean, you know,  
3 hey, my neighbors didn't get the Nobel Prize,  
4 but they -- they don't know a lot about  
5 organic. They're very suspicious and stuff,  
6 when I came with the bees and that's very  
7 helpful, and it also is helpful for catching  
8 them.

9 If they're going to do something  
10 like throw seven out there, you know, oh, I  
11 didn't know that wasn't -- you know, education  
12 has to be a personal thing and it's a full  
13 time thing.

14 MR. SMILLIE: How many different  
15 locations would you utilize? How many  
16 different spots? How many of those 6,600  
17 acres --

18 MS. RAKER: The most that I've had  
19 is three.

20 MR. SMILLIE: Three?

21 MS. RAKER: But again, you have to  
22 draw those concentric circles, just, you know,

1       it's not -- it's about seventh grade geometry.  
2       They got nothing to do in the winter up there,  
3       anyway, right. Just, you know, I mean, I  
4       never heard stuff like this.

5                   I can't be organic. You want me  
6       to keep the bees over the winter? Life is  
7       full of choices. You are or you aren't. Just  
8       stop the fakes. Our big problem up in our  
9       area, because what is the odds that some  
10      Federal inspector is going to make their way  
11      up to the Q&R or Wakefield or some place, and  
12      pop these people? I mean, that's what they  
13      need. They're criminals.

14                   MR. GIACOMINI: Okay.

15                   MS. RAKER: They're making a lot of  
16      money.

17                   MR. GIACOMINI: Jay?

18                   MR. FELDMAN: Thank you for your  
19      testimony. Have you had any problems with  
20      collapse disorder?

21                   MS. RAKER: No, and there are no  
22      other -- I would call them non-toxic. They

1 are not certified organic. There are no other  
2 bee keepers that have, that I know of, either.  
3 We're constantly in contact with each other,  
4 and it's very unheard of in Northern Europe  
5 and Germany.

6 MR. FELDMAN: Thanks.

7 MR. GIACOMINI: Kevin?

8 MR. ENGELBERT: Your comments about  
9 hive materials and plastic foundations, this  
10 is the first we've heard of that, and all the  
11 research that's been done since, this is the  
12 first time this proposed standard was issued  
13 in 2001.

14 Could you elaborate, just a little  
15 bit, on why you think it shouldn't be allowed,  
16 when it's become an industry standard practice  
17 and --

18 MS. RAKER: I know it's an industry  
19 standard practice, but here is the difference.  
20 Why is it a practice? Because it's convenient  
21 for people, that's what I was told to start  
22 with bees with, and particularly at the

1 northern latitudes, the bees hate it. They  
2 tear the wax off, they build other stuff, they  
3 refuse to work it. They will not do it the  
4 way they will, wax.

5 Bees have one way they want to do  
6 things, any bee keeper will tell you this, the  
7 bee way, and we try to, you know, be bee-  
8 havers and have them around and get them to  
9 produce and stuff.

10 But when you're doing it  
11 organically, and you're monitoring and you're  
12 checking for toxification or impediments to  
13 bee production, then you're saying, all right,  
14 my time isn't quite as valuable as I might  
15 have thought it is, and just for the bees, and  
16 I want the bees to be happy.

17 When they're happy, they're  
18 healthy and they're producing honey and when  
19 there is not a nectar flow or something is  
20 wrong with the queen, they come and get me, go  
21 in my hair and bounce off my head, and stuff  
22 like that.

1           I mean, that's why, it's because  
2           there is an impediment to the communication  
3           within the hive, which is very -- I don't to  
4           sound like an oh wow or that I whack my head  
5           on wind chimes, but it's very important that  
6           this integral system of communication.

7           And then the second thing is, you  
8           know, it just really doesn't belong in there,  
9           except for convenience, and it not only  
10          impedes the communication, but the German's  
11          have said, again and again and again, and in  
12          Austria and Eastern Europe, they talk about  
13          this, that it's not -- they keep saying, not  
14          a bee product, not a bee product, and there  
15          does seem to be a great deal of validity.

16          Now, I understand that in Florida,  
17          some of the southern states, that they have  
18          huge nectar flows going a lot of the year and  
19          the bees will draw it out and stuff, but my  
20          experience, and people in up-state New York  
21          and Ontario and Quebec, is that no, and --

22          MR. ENGELBERT: What do you use for

1 foundation?

2 MS. RAKER: Wax, the bees make it.  
3 It works. They've been doing this for a long  
4 time. So, it's -- I don't mean to just be  
5 felicitous and down grade what you are saying,  
6 but you know, like, the more I learn about  
7 bees, the less I know, the more I learn.

8 MR. ENGELBERT: I understand. I  
9 didn't take that felicitously.

10 MS. RAKER: Okay.

11 MR. ENGELBERT: I appreciate your  
12 comments, and I know you're sincere.

13 MR. GIACOMINI: Jeff?

14 MR. MOYER: You said that your  
15 number one priority really was enforcement,  
16 and I'm curious what Miles has to say about  
17 your comments, about people teaching classes  
18 on how to sell organic honey, without being  
19 organic. Miles?

20 MR. McEVOY: Yes, are those in your  
21 comments? Do you have those details in your  
22 comments?

1 MS. RAKER: They're in here and I  
2 mentioned it. I mean, we just -- we raised  
3 Cain for over six months. We got a hold of  
4 MOSA. There were conventional bee keepers  
5 that were upset and disgusted and one of the  
6 things I see happening, as a result of the  
7 working group and some of the people in this  
8 room, and the community, is that this has  
9 really caused a paradigm shift with  
10 conventional bee keepers that were laughing at  
11 organic ten years ago, and all this stuff.

12 Now, they're like, well, you know  
13 what? Those chemicals, the bees, or the mites  
14 or whatever, there is a different interaction  
15 right away, but, yes, that was in there and  
16 I'm also concerned that there is a certified -  
17 - there is a certification process. The  
18 inspectors that I have dealt with have been  
19 extremely professional, and very thorough, and  
20 then you see beyond organic, certified  
21 naturally grown.

22 But these were actually saying



1 organic, in some cases, copying the seals,  
2 some cases, flashing fake certificates --

3 MR. McEVOY: Okay, we'll be in  
4 touch.

5 MS. RAKER: Good.

6 MR. McEVOY: Right.

7 MS. RAKER: Great, that's nice.

8 Thank you.

9 MR. GIACOMINI: Thank you. Next  
10 up, Urvasni, Will and the back end of the  
11 switch there, with Rob. Thank you.

12 MR. RANGAN: Good afternoon. My  
13 name is Urvasni Rangan. I'm Director of  
14 Technical Policy at Consumers Union. We  
15 publish 'Consumer Reports' magazine.

16 I want to thank the Board. I want  
17 to thank the NOP. It's been a really  
18 interesting year. A lot of improvements have  
19 been made and it's been really heartening to  
20 see it.

21 I'm here to talk about a couple of  
22 issues. The first one is nano-technology.

1       Wouldn't be a meeting if I weren't commenting  
2       on that. We really appreciate the work and  
3       where the recommendation is. It's really  
4       looking pretty good.

5                 We don't see any need to wait for  
6       a symposium before you put that through. We  
7       think there ought to be a strict and explicit  
8       prohibition on nano-materials and engineered  
9       nano ingredients.

10                We think the symposium ought to  
11       not be a free for all, but really, focused on,  
12       for example, where the NOP whacks the  
13       statutory authority around nano-engineered  
14       ingredients, especially around packaging,  
15       given Harvey, given the 2002 food contact  
16       substance clarification.

17                So, we see a symposium as being  
18       particularly useful to you all, to identify  
19       where the gaps are, and where those need to be  
20       filled to make sure that a prohibition is  
21       really meaningful.

22                In terms of animal welfare, we're

1 really glad to see that document moving. I  
2 appreciate the comments that Bonnie made and  
3 I do think that the challenges to be able --  
4 to create quantitative standards may be within  
5 'at least' space requirement, so that we don't  
6 get exploitation of stocking densities, and  
7 other things, and one board member asked  
8 earlier today, about whether consumers in  
9 interested in whether the chickens go outside,  
10 do they care?

11 We have some interesting survey  
12 data from 2008, where we were asking about the  
13 naturally raised claim. Some of you may be  
14 familiar with that initiative, over it, USDA,  
15 as well, and we asked about 1,000 consumers,  
16 it's a nationally representative survey, what  
17 they would come to expect from a product that  
18 they bought with a naturally raised claim  
19 about the animal itself.

20 Eighty-five percent want it to  
21 come from a natural environment and from an  
22 animal that ate a natural diet. Seventy-seven

1 percent want it from animals that had access  
2 to the outdoors, 76 percent want humane  
3 treatment and 68 percent want to make sure  
4 that the animals were not confined.

5 So, if that gives you any kind of  
6 vector, in terms of understanding what  
7 consumer expectations might be, I think you  
8 can take a clue from the results from that  
9 survey work.

10 In terms of outdoor access, we  
11 have a lot of problems with confined animal  
12 feeding operations. The last salmonella  
13 outbreak on eggs was due to filthy conditions  
14 and a confined animal operation. So, I don't  
15 think the outdoor/indoor is a black and white  
16 issue and I think definitely, more work needs  
17 to be done on that. We think it can be done  
18 properly without outdoor access, and some of  
19 our chicken studies in the past pathogens have  
20 illustrated that.

21 With regard to the "made with," I  
22 don't see a time. I'm sorry, I don't know

1 who is keeping time. Time? Tina? Thanks.

2 "Made with organic" seal, I mean,  
3 we also think the biggest problem here is  
4 about the mis-use of the organic label. I can  
5 see the efforts trying to differentiate to  
6 show that `made with' fits in the NOP, whereas  
7 others don't fit into that.

8 We don't think you have to go to  
9 all the trouble. We really think that dealing  
10 with the mis-uses of the organic label are  
11 what are key to reducing consumer confusion in  
12 the marketplace. The Federal Trade Commission  
13 has a proposed green guide out now, and I'd  
14 encourage anyone who is interested, to make  
15 comment to the FTC, to ask them to help  
16 enforce against organic claims that are made  
17 on products that do not meet the national  
18 organic program.

19 We really -- that is the crux of  
20 the consumer confusion out there, sewerage  
21 sledge, labeled as organic, personal care  
22 products that don't even meet the minimum

1 requirements, labeled as organic, that's what  
2 is confusing and this, while interesting, is  
3 not going to address those problems.

4 If we do go forward with this  
5 recommendation, we would like to advise that  
6 we do additional differentiation to say some  
7 additional statement about what tier of  
8 organic label is it certified to, so that  
9 consumers are not then led to believe that  
10 'made with' organic and 100 percent are all  
11 the same thing.

12 The recommendation is written in a  
13 way where the same effort and the same  
14 inspection level goes on. They're not the  
15 same. They're value tiers and we should  
16 continue to educate consumers about that.

17 Finally, on corn steep liquor, the  
18 gentleman who was up here before, I just  
19 respectfully disagree. Disulfide bonds are  
20 covalent bonds. When you break a disulfide  
21 bond, you have a chemical change.

22 There is a patent out there,

1 covalent attachment of nucleic acid molecules,  
2 onto solid faces, via disulfide bonds. This  
3 controversy over whether a disulfide bond is  
4 a covalent bond or not is nonsensical. It is  
5 a covalent bond, and you need a reducing agent  
6 to break that bond. That's what the sulfur  
7 dioxide is doing, and protein structure and  
8 folding, I have curly hair, and much to my  
9 mother's chagrin, I wanted to straighten it  
10 all my life.

11 So, I would take a hair dryer and  
12 straighten it. I wasn't breaking a disulfide  
13 bond. If I got get a chemical straightener  
14 with the smelly stuff on my hair, that's  
15 what's going to break the disulfide bond, and  
16 make it straight, and that will happen in a  
17 permanent way.

18 This isn't about a loosey-goosey  
19 coming loose, coming together. This is about  
20 breaking a covalent bond, doing it  
21 deliberately and therefore, we think that corn  
22 steep liquor, with the use of sulfur dioxide

1 is, in fact, a synthetic substance and the  
2 residue variability at the end is definitely  
3 an issue that's got to be dealt with and in  
4 the face of uncertainty, you all need to  
5 grapple with that, as to whether or not you  
6 want to approve it as a synthetic or not, for  
7 that purpose. Thank you.

8 MR. GIACOMINI: Questions or  
9 comments? Jay?

10 MR. FELDMAN: Thank you. Thank  
11 you. Do you have any consumer data on nano-  
12 tech, or can you derive any sense of consumer  
13 expectations, regarding nano-tech and organic?

14 MR. RANGAN: Jay, I am going to go  
15 take a look at the poll. We did ask a couple  
16 of questions around nano-engineering. At the  
17 time, it was a little bit tricky, because they  
18 don't -- consumers don't know what it is. So,  
19 it's a hard to do survey work around things,  
20 where consumers lack knowledge all together.

21 But let me see what I do have, and  
22 I'll submit that.



1 MR. FELDMAN: I haven't heard any  
2 proposals coming up in this area, but I'm  
3 wondering how you would view, you know --  
4 there are several proposals in there, in terms  
5 of the committee report or committee  
6 recommendations, and one is to list as an  
7 excluded method.

8 Do you see any analogies here, to  
9 other technologies that the Board has dealt  
10 with, historically --

11 MR. RANGAN: Well, I think  
12 certainly, in terms of genetic engineering,  
13 it's comparable and it's something, when it  
14 comes to consumer expectations, it's going to  
15 be really hard to explain to consumers that  
16 some organic products have a little bit of  
17 nano-materials and some don't, because some  
18 were allowed to and some weren't.

19 This is a case where consumers  
20 don't want nano-engineering in the organic  
21 products they buy. It's an opportunity for  
22 organic to provide that kind of product in the

1 marketplace, which is -- there is not  
2 guarantee right now, for consumers, and I  
3 guess I'd just like to add one other thing,  
4 which is that while I'm not up here to dispute  
5 the size that you've allocated in the  
6 recommendation, that the FDA's center for drug  
7 evaluation and research has released a policy  
8 statement, defining nano 1,000 nano-meters or  
9 under.

10 So, you are going to have to  
11 grapple with that too, at some point,  
12 especially if FDA decides to take that on with  
13 food, and Michael Hansen, who submitted  
14 comments, on this, you'll see the specific  
15 language that we've recommended, so that it  
16 can include the FDA philosophy that's building  
17 around this and the guidance that they're  
18 building, so, you can be in step with the FDA,  
19 as well.

20 MR. FELDMAN: And knowing what you  
21 know about nano, do you think we're going to  
22 have enforcement problems, in terms of keeping

1 nano out?

2 MR. RANGAN: I think that if you do  
3 restrict prohibition that that's the way to  
4 keep it out, versus sometimes, it's okay,  
5 sometimes, it's not. It may be on a piece-  
6 mail basis. I think to do it on a piece-mail  
7 basis is to invite the confusion in the  
8 marketplace, and really, inconsistencies among  
9 organic products.

10 MR. FELDMAN: Thanks.

11 MR. GIACOMINI: Joe?

12 MR. SMILLIE: Back to chemistry  
13 101.

14 MR. GIACOMINI: Go ahead.

15 MR. SMILLIE: Okay, back to  
16 chemistry 101. Instead of the people holding  
17 their hands together, right, and they're still  
18 people, your hair was still your hair, after  
19 you washed out, right?

20 MR. RANGAN: My hair was straight,  
21 not curly, though --

22 MR. SMILLIE: But it was still your

1 hair, right? You know, the analogy is, in  
2 other words, that the chemical change didn't  
3 change your hair. You can change it,  
4 physically, as well as -- as with the perm, or  
5 whatever, right?

6 So, the argument comes down to a  
7 strictly scientific argument, whether it's a  
8 covalent bond or not, am I getting this right?

9 MR. RANGAN: If you have proteins  
10 that are gummed up together and tangled up  
11 with starches, and you're trying to say you  
12 don't need a chemical reaction to happen, to  
13 un-do that, to release the starch, that is  
14 incorrect chemistry 101.

15 You do need to break covalent  
16 bonds, and you do need to do that, in order to  
17 release the starch from the protein matrix,  
18 and that is happening through break in  
19 disulfide bonds, Joe, and any chemistry  
20 textbook you'll check out, sulfur to sulfur  
21 bonds are not ionic. They're not weak. They  
22 are strong covalent bonds. They are weaker

1 than a carbon/carbon, but they are strong  
2 covalent bonds, and they can't be broken, just  
3 like that. It's not just holding hands. It  
4 has to actually be chemically cleaved.

5 MR. FELDMAN: And you are a  
6 chemist, correct?

7 MR. RANGAN: I actually majored in  
8 chemistry, Joe, yes.

9 MR. FELDMAN: Right, I do remember  
10 that.

11 MR. RANGAN: Yes.

12 MR. FELDMAN: I remembered that.

13 MR. RANGAN: I'm glad you did.

14 MR. GIACOMINI: Anymore questions  
15 or comments? Thank you. Next up, Will, Rob  
16 and Ryan.

17 Before you start, Will, could you  
18 start giving us an estimate count of how many  
19 we'll probably have after 5:30 p.m., when  
20 we're going to need to be looking at another  
21 break? Lisa, please. Thank you.

22 MR. FANTLE: Actually, you can go

1 to Rob. I'm going to give my time back. I  
2 think I have another opportunity on Wednesday.  
3 So, I'll speed things up. Go ahead.

4 MR. GIACOMINI: Thank you. Rob,  
5 Ryan, and Jackie.

6 MR. SERRINE: Thanks. I appreciate  
7 the time. Thanks, to the Board, for this  
8 opportunity. My name is Rob Serrine.

9 I think hops should be removed  
10 from the exemption list. I'm from Michigan,  
11 America's high five, and a state well on its  
12 way to becoming America's leading hop  
13 producer. My friends in Washington are awake.  
14 Just joking.

15 I work for Michigan State  
16 University extension, with specialty crop  
17 producers up in Northwest Michigan, the tip of  
18 the pinky, and I've been the point person for  
19 hops, for MSU, for the last couple of years.

20 Hops are definitely a fledgling  
21 industry, in Michigan, but growing with strong  
22 interest and a great partnership with local

1 brewers, as well.

2 But working with a group of five  
3 organic growers who make up the Michigan hop  
4 alliance, you heard from one of their member,  
5 Brian Tennis, today, and I would that the  
6 economic viability of these farmers is  
7 directly related to the decision to take hops  
8 off the exempt list.

9 I have a few points to make, in  
10 terms of the hops 606 status. First, the  
11 AOHGA in their petition suggests that, and I'm  
12 quoting, while a brewer may believe that one  
13 particular variety in parts unique  
14 characteristic or flavor profile to beer, the  
15 fact that a brewer's preferred variety is not  
16 currently grown or potentially -- cannot be  
17 grown organically should not be a reason for  
18 hops to remain on the National List, and I  
19 completely agree with this.

20 And I'll just give you an example  
21 from Michigan, and see if it fits. There is  
22 also a hard cider industry in Michigan, from

1 apples, and different cultivars of cider  
2 apples are grown because they in part specific  
3 flavor profiles.

4 For example, a common mix might  
5 include a 60 percent neutral base, sweet low  
6 acid apple, like a wine sap, 15 percent tart  
7 apples, medium acidity, like a Rhode Island  
8 green, 15 percent aromatic, like a winter  
9 banana apple, and 10 percent astringent  
10 apples, with a high tanning level, like a  
11 newton apple.

12 Now, not every single variety of  
13 cider apple is grown in quantity to support  
14 the entire hard cider industry, in terms of  
15 organic. Yet to my knowledge, hard cider  
16 producers can't just substitute a conventional  
17 apple variety and slap the USDA organic label  
18 on their bottle. So, why should hops be held  
19 to a different standard?

20 My second point relates to the  
21 comments made by the handling committee, in  
22 their Spring decision, and the quote is,



1 Public comments indicate that although the  
2 organic hops industry has grown, there is  
3 still the form, quantity and quality available  
4 to serve the entire beer industry.

5 So, I guess I pose the question,  
6 if one brewer suddenly desires a specific  
7 variety, out of the 150+, perhaps, it's a  
8 proprietary variety that's only grown  
9 conventionally on one farm. Should this then,  
10 be reason enough to leave hops on the  
11 exemption list? I don't think so.

12 Third, and Pete covered this very  
13 eloquently, I'm not really fully aware of the  
14 handling committee recommendation making  
15 process, or the NOSB Board's decision making  
16 protocol, but I did have a concern about the  
17 handling committee's original recommendation  
18 based upon the Spring 2010 meeting.

19 As I mentioned, Pete covered that.  
20 I don't want to rehash that, and I really do  
21 appreciate all the work you do and the time  
22 you put in.

1 I did have one specific question,  
2 though. Can't you just base your decisions on  
3 the public comment? Again, coming from a  
4 novice, in this field, and I guess, if that's  
5 not a gauge of how people feel, then I don't  
6 know what is.

7 So, based upon the public comment,  
8 from September 24th to October 18th, I counted  
9 more than 100. Of these, only four supported  
10 leaving hops on the list, two breweries, a  
11 consultant that was hired by one of the  
12 breweries, and CCOF, and two of these have  
13 actually agreed with the recommendation to  
14 remove hops from the list in January 2013. So,  
15 that's two, out of greater than 100.

16 In all, I added 11 brewers, with  
17 only one objecting. There were 16 farmers  
18 represented on that list, as far as I could  
19 count, all in favor of removing hops, several  
20 home brewers and dozens of private citizens,  
21 all of whom brought forth issues of  
22 credibility of the USDA organic label, and

1 want hops removed from the list.

2 I'll also encourage you to,  
3 please, at least consider the words of the  
4 many brewers. We just heard from one a few  
5 minutes ago, and I'll just read a quick quote  
6 here, Fremont Brewing Company, for the  
7 continued vitality of the American craft  
8 brewing sector, Fremont Brewing Company  
9 advocates the National Organic Standard Board,  
10 approves the petition of AOHGA, to remove hops  
11 from the list.

12 Another quote in the written  
13 comments was from Wolaver, in 2009, Wolaver's  
14 organists committed to quantities and pricing,  
15 so that our organic grower could plant the  
16 hops, to help further develop a steady supply  
17 of organic hops. The decision by Wolaver's to  
18 use 100 percent organic hops has created  
19 higher costs to produce our beer. We made a  
20 financial sacrifice at accepting reduced  
21 profit for our products, so we can help build  
22 a reputation for organic beer and ales brand

1 that has integrity.

2 This decision also gives the  
3 organic crop growers an opportunity to grow  
4 and produce consistent hops at a fair price.

5 In closing, this will be my last  
6 thing, brewers who have a perceived problem  
7 sourcing specific varieties of organic hops  
8 should take the example of this brewery and  
9 others, and take it upon themselves to  
10 communicate with the AOHGA, hop brokers and  
11 even the growers themselves, to make  
12 arrangements to purchase organic hops.

13 In fact, I would contend that if  
14 they were serious about organic, they would  
15 have already done so. With the majority of  
16 brewers, growers and all the citizen comments  
17 in support of removing hops, it's obvious to  
18 anyone, which side the significant number of  
19 public comments favors, and that is to remove  
20 hops from the list and provide economic  
21 benefits for farmers, enhance environmental  
22 quality and restore credibility to the USDA

1 organic label. Thank you for your time.

2 MR. GIACOMINI: Comments and  
3 questions? Okay, hearing none, thank you very  
4 much.

5 Just received notice from our --  
6 from Lisa, we're still looking at  
7 approximately 17 more commenters signed up for  
8 this evening. We're going to do one more,  
9 before break, but let's all just keep in mind,  
10 Board members, commenters, we're not going to  
11 cut anybody off. The people signing up at the  
12 end are as valuable and as important as the  
13 people who were signing u at the beginning.

14 But if we can avoid redundancy, if  
15 we can avoid other issues that don't need to  
16 be covered, we would appreciate any  
17 consideration for time that you would allow,  
18 and we will try and do the same.

19 But we probably had an hour and a  
20 half, after we come back from break, before we  
21 break for dinner.

22 So, we're up to Ryan, Jackie and

1 Loren. Go ahead. We're going to -- Ryan, and  
2 then we'll break.

3 MR. MILLER: I want to thank you  
4 for this time today. My name is Ryan Miller,  
5 and I'm from Farmers' Hen House, and we are  
6 located in Kalona, Iowa. We contract with a  
7 number of local organic farmers. It depends  
8 on the year, because whether we have some in  
9 transition or not, but we contract with around  
10 20 layer houses.

11 Also in our community, we have 12  
12 barns of hens for Organic Valley. We do the  
13 processing for those. We also work with 10  
14 farmers in Illinois that have 15,000 birds  
15 each or organic hens.

16 Our barns range from 1,200 to  
17 around 9,000. The average is about 6,000. A  
18 lot of these farms -- the original farms in  
19 our area, the bulk of them are within 10 miles  
20 of our plants. Another group of them are  
21 about 100 miles away, and the first one  
22 started probably 13 years ago, and most of

1       them in the last eight years, but there has  
2       been a good number in our community, and  
3       everyone has been able to do outside access,  
4       plenty of outside access, at least one and a  
5       half square feet inside, for a long time.

6               Our certifier, GOA, Global Organic  
7       Alliance, had two square feet inside. It's  
8       worked really well. Obviously, we think that  
9       the guidelines of providing the birds outside  
10      access for organic is very important. That's  
11      what the consumers are expecting.

12             We have a long history of doing it  
13      there in Kalona. We've never had any problems  
14      with birds getting sick because they go  
15      outside, because of factors they encounter on  
16      the outside.

17             So, we would be in favor of the  
18      one and a half square feet inside and the two  
19      square feet outside, and we'd like to see  
20      those specific guidelines put into the  
21      regulations, so that we can all, in the  
22      organic industry, like Mr. Cox mentioned

1 earlier, so, that we all know what those  
2 guidelines are and we can all follow those  
3 same guidelines and I don't really see a  
4 reason why people producing organic eggs  
5 anywhere in the country, wouldn't be able to  
6 fall into those same things we've seen at work  
7 for a long time in our area, and that's one of  
8 the things that's important to our farmers,  
9 and to us, and that's pretty much all I'd like  
10 to say.

11 MR. GIACOMINI: Thank you.

12 Questions or comments? Okay, thank you.

13 It's 5:30 p.m. We have another  
14 hour, possibly hour and a half to go, but we -  
15 - recess was scheduled now, but I believe we  
16 need to take a break. So, 15 minutes and  
17 let's get back and please, try to be prompt.

18 (Whereupon, the above-entitled  
19 matter went off the record at 5:30 p.m. and  
20 resumed at 5:45 p.m.)

21 MR. GIACOMINI: Lisa, are we on  
22 Jackie?

MS. BRINES: You're on



1 Jackie.

2 MR. GIACOMINI: Is Jackie in?

3 You're in, okay. We lost you, okay.

4 All right, we'll come back to  
5 order. We have a -- I guess we have  
6 everybody. So, we're going to -- we're ready  
7 to go. Jackie is here, followed by Loren and  
8 Natasha. Are they both here? Okay, go ahead,  
9 Jackie.

10 MS. VON RUDEEN: My name is Jackie  
11 Von Ruden. I'm a farm certification manager  
12 at Midwest Organic Services Association.  
13 We're based in Wisconsin. We have over 1,300  
14 clients with the highest concentration here in  
15 Wisconsin, but we stretch out, reach out into  
16 11 other states, as well. Half of these  
17 operations are livestock.

18 My comments are primarily in  
19 regard to the animal welfare discussion  
20 document on stocking density.

21 Earlier this year, at the request  
22 of the NOP, we surveyed our livestock

1 producers to see what space they provided on  
2 their operations. Comparing the survey  
3 responses to the space recommendations of the  
4 livestock committee, we see that our producers  
5 are pretty much meeting the requirements in  
6 most situations.

7 The following are areas that  
8 either present difficulties or need further  
9 clarification in our eyes.

10 The first one is indoor bedded  
11 space for dairy cattle. That was brought up  
12 earlier today, but the chart indicates that  
13 cows should be provided with an indoor bedded  
14 space of 10 square foot per 220 pounds. A  
15 small breed of dairy cows, like Jerseys, would  
16 have to have 50 square feet, and a large breed  
17 would have to have 64 square feet. That's far  
18 larger than any space provided in tie-stalls  
19 or stanchions, and we all know that cows don't  
20 roam about the barn freely in those type of  
21 barns.

22 There is no way our producers

1       could meet these requirements and we'd like to  
2       point out that it would be pretty radical to  
3       prohibit stanchions and tie-stalls.

4                 However, it would be in keeping  
5       with the direction that you are going, to  
6       specify how much time for fresh air and  
7       exercise, should be provided in the winter  
8       months, in climates like ours.

9                 A last thought on cattle, it seems  
10       that the discussion alludes to bedding being  
11       required. We wondered where cow mats and  
12       comfort mats fit into that part of the  
13       discussion.

14                We typically don't see bedding in  
15       conjunction with comfort mats.

16                Poultry requirements. Although  
17       most of our producers already would meet the  
18       indoor space provision, we feel that there are  
19       some areas where clarification is needed.

20       Would this be a requirement, that all poultry  
21       operations provide liter? The chart seems to  
22       be suggesting that perches would be required

1 for pullet, but optional for layers. Is that  
2 the case?

3 How would square footage be  
4 calculated in an aviary style system? We  
5 would -- what inspectors need to do, testing  
6 of air quality to assess ammonia levels, and  
7 if so, how would that be done?

8 We have other comments and  
9 questions about outdoor requirements. Our  
10 layer operations already could meet the  
11 proposed outdoor requirements, but in many  
12 cases, the outdoor access is being provided,  
13 but it's not being utilized.

14 We believe that the specific door  
15 opening recommendation of six feet per 1,000  
16 hens would make a difference in the  
17 utilization of outdoor space by birds, but  
18 there are other factors to consider, as well.

19 Currently, we do not require  
20 pullets to be provided with outdoor access  
21 until they're acclimated to the lang barns.  
22 There is some sentiment in the industry that

1 pullets need to learn to go outside, learn  
2 that the outside world exists, in order to  
3 utilize it as hens.

4           However, there are concerns among  
5 pullet raisers that exposing the pullets to  
6 the outside environment, before they're  
7 vaccinations fully kick in, would heighten the  
8 risk of salmonella, showing up in pullet  
9 flocks, which would, with the new FDA  
10 requirements, preclude them from producing for  
11 the whole egg market.

12           MOSA does not have a stance on  
13 this issue, but it has been on that has been  
14 expressed by our major pullet raisers, so, we  
15 ask that it be considered and we be provided  
16 with some guidance.

17           As mentioned before, I think that  
18 you need to give even more consideration to  
19 this question of why birds aren't utilizing  
20 the outdoor access they are being provided  
21 with. As mentioned before, is part of it that  
22 they don't learn to go outside as pullets? If

1 you consider dairy animals and grazing, cows,  
2 dairy cows are taught to go outside at a young  
3 age, to graze. Pullets, maybe that would be  
4 the same case.

5 Do birds need some kind of outdoor  
6 -- overhead shelter to feel safe from  
7 predators, and how prescriptive do you want to  
8 get? Can a note from a vet keep birds inside?  
9 We'd prefer it didn't.

10 Is the temperature -- what is the  
11 temperature -- when is the temperature high  
12 enough for birds to go out? Right now, we say  
13 around 50 degrees. How long of an adjustment  
14 period should layers -- should the pullets be  
15 given for adjustment to laying? We say three  
16 to four weeks.

17 One final point. The document  
18 suggests that the two square foot allowance  
19 outside would allow for rotating outdoor  
20 access areas. We don't see that most of the  
21 poultry operations are -- have a set up that  
22 allows for rotating, and one final comment on

1 -- one final comment on animal welfare.

2           The sentence that says, "No  
3 animals should have broken tails," stood out  
4 to me. We feel that it would be more  
5 appropriate to consider the incidents of  
6 broken tails, in an overall animal welfare  
7 evaluation that takes into consideration, any  
8 signs of mistreatment, mortality rate, body  
9 condition, locomotion and cleanliness. Thank  
10 you.

11           MR. GIACOMINI: Thank you. Just, I  
12 believe as far as the tie-stall and stanchion,  
13 I think that was covered in the previous  
14 animal welfare document, where we require one  
15 stall per animal.

16           So, I don't think the intent is  
17 for -- we've heard a couple other comments on  
18 that. The intent on this not for it to  
19 include --

20           MS. VON RUDEN: To override that.

21           MR. GIACOMINI: Yes, this is --

22           MS. VON RUDEN: We would hope not.

1 MR. GIACOMINI: -- more the open  
2 pen.

3 MS. VON RUDEN: Excellent.

4 MR. GIACOMINI: Okay, comments or  
5 questions? Okay, thank you.

6 MS. VON RUDEN: Thank you.

7 MR. GIACOMINI: Loren, Natasha and  
8 Trudy. Go ahead.

9 MR. YODER: My name is Loren Yoder.  
10 I'm not much of a talker. I live in Iowa, and  
11 I have around 9,000 to 10,000 organic  
12 chickens, is what I have.

13 I run five square foot per bird,  
14 on the outside. I leave my chickens out 24  
15 hours a day, seven days a week, all summer.  
16 So, therefore, when September 1st comes, I got  
17 at least one square foot per bird, on the  
18 outside around the building, that's totally  
19 bare and scratched, and I think the chickens  
20 are very healthy.

21 When they run outside, there is  
22 less stress inside, if they loosen up and run



1 around outside. The other four square foot of  
2 grass is pretty chewed up, from running around  
3 all the time. For me, I guess I would wish  
4 that the National Organic Board would make a  
5 rule and it would solve a lot of problems.

6 If they would make a rule that  
7 every chicken inside has -- is, by September  
8 1st, is going to have one square foot on the  
9 outside around the building and have one  
10 square foot that is bare and scratched. If  
11 the inspector checks it, first of September,  
12 there is proof that the chickens was outside,  
13 and they were running outside.

14 My experience is, if the chickens  
15 are turned out, that they can go out whenever  
16 they want to. They will learn to go and they  
17 will go out.

18 My building is 200 feet long. I  
19 got a 14 foot door, at one end. So, they only  
20 can go out. They got a 14 foot door and it's  
21 200 foot from the other end. But to me, it's  
22 amazing, when they're out 24 hours a day,

1 seven days a week, how they run out and how  
2 that whole five square foot per bird in the  
3 evening, it just full of hens. The chicken  
4 lot does need to be tiled out. The roof needs  
5 to be -- have spouting on it. It only takes  
6 one day and then it's all dried out again, and  
7 I never had any health problems.

8 In Iowa, we have about 30 to 40  
9 chicken houses that the Amish people own and  
10 they have no electricity. So, all the hens  
11 houses have curtains on each side, with a  
12 ridge on top, and all them have no lights or  
13 forced air or anything inside.

14 So, the chicken is used to light,  
15 and air movement. When they go outside, it is  
16 not a different world.

17 So, I think that also helps that  
18 they run outside a little better. So, I don't  
19 really have too much more to say about it,  
20 except I wish if there be a rule made, that  
21 the chickens have to have about one square  
22 foot per bird, that's bare and scratched, then

1 everybody is going to be scrambling to make  
2 enough holes in their buildings, so the  
3 chickens can get out, so, that it will be  
4 scratched. If they don't provide holes that  
5 they can't get out, and don't leave them out,  
6 whenever it's raining or whatever reason, then  
7 the chickens are kind of slow in going out and  
8 there is just not going to be any bare scratch  
9 area outside.

10 So, I would wish that there would  
11 be made a rule how much bare scratch has to be  
12 by the 1st of September, because everybody is  
13 going to try hard to get the chickens out, if  
14 it would be a rule like that, because it's  
15 proven to me, it does work.

16 MR. GIACOMINI: Okay, Kevin?

17 MR. ENGELBERT: Thank you for your  
18 comments. Where do you market the majority of  
19 your eggs, and do you trim beaks?

20 MR. YODER: My eggs go to Organic  
21 Valley, Farmers' Hen House processed eggs.  
22 My chickens, I trim beak them at five weeks

1 old.

2 In our area, where you have  
3 curtains, the curtains are light. I mean, they  
4 leave the light go. So, in winter time, you  
5 got plenty of light inside. We have to trim  
6 beak them because if you don't, with more  
7 lighting, they will be a little more prone to  
8 peak, but if you got them turned out 24 hours  
9 a day, then they'll loosen up.

10 The other thing I do, Organic  
11 Valley requires six inches for a perch. I got  
12 9,000 foot of perch. So, my chickens have  
13 almost -- well, they'd have like 11 inches per  
14 hen, and I watch the chicken already. I spent  
15 some hours already, watching them. Each  
16 chicken, when it jumps up on a perch, it will  
17 turn around. They won't just jump up.

18 So, one chicken needs at least  
19 eight to ten inches of a perch, where they can  
20 jump up, and if you provide a lot of perches,  
21 a lot of chickens will jump up, then they'll  
22 be less, they won't be as full on the bottom,

1 and they can rest and they're not -- it's just  
2 like human beings. If everybody is crowded in  
3 a room, I think everybody will get a little  
4 crabby too.

5 But if they can jump on a perch  
6 and some run outside, mine go out, in April  
7 when it starts getting above 40 or 50, they  
8 start running outside and once Fall comes,  
9 seems then they're extra tougher, and they'll  
10 be out until Thanksgiving.

11 Once it gets under 40 degrees or  
12 so, then -- and the wind blowing, then they  
13 don't go outside anymore, and I wish the rule  
14 would be made that so much square foot has to  
15 be bare and scratched outside the building  
16 because all the big companies that want to  
17 have like, 50,000 or 80,000 or 100,000 birds,  
18 then they would have to do that also, because  
19 that is what the consumer is looking for.

20 The consumer is thinking the  
21 chickens are outside and what happens is, the  
22 bigger guys, if they don't -- if they cheat

1 that rule on the pasture, then they raise so  
2 much eggs that they supply the market and then  
3 a small family farmer have to -- can't  
4 increase.

5 Right now, we have several people  
6 on the list with Organic Valley and Farmers'  
7 Hen House. We would -- there would be more  
8 people that would build about like, six,  
9 seven, 8,000 house, if they could. But for  
10 us, we have to have the chickens outside and  
11 we have to have our pullets outside access  
12 with pasture, and I think if the consumers --  
13 if that's what the consumer is expecting, then  
14 I think all the bigger guys and anybody else  
15 should do that the same way.

16 Outside porches don't pass for  
17 nothing to me.

18 MR. MOYER: Loren, I want to thank  
19 you for your comments. I think they are very  
20 well taken and you've given the livestock  
21 committee some different things to think  
22 about, and I would disagree with your earlier

1 comment, that you're not a good talker.

2 You're a very good talker.

3 But I do have one question for  
4 you. What would happen to the system if you  
5 had more than five square foot per bird? I  
6 mean, I don't think we want to limit people in  
7 the upper end. If you had 10 square feet per  
8 bird, you would not get that same amount of  
9 scratching. So, you may not get that bare  
10 ground, and then you might penalize somebody  
11 for doing something too good.

12 MR. YODER: I disagree with you,  
13 because the chicken comes out the door first,  
14 she will play around outside, before they go  
15 further out.

16 Now, if I would have 10 square  
17 foot per bird, the further out one around, the  
18 grass would get a little taller. At five  
19 square foot per bird, my grass, this Fall, is  
20 only about this tall, at the farther off, and  
21 they got to walk at least about 200 to 250  
22 feet to the further end.

1                   And I wish the rule would be made  
2                   that all organic chicken houses, the grass  
3                   can't be more than about this tall, unless  
4                   they go over five square foot, but if a rule  
5                   would be made that they have to have one  
6                   square foot of bare ground around the  
7                   building, that's bare and scratched, that's  
8                   proof that chickens are turned out. They are  
9                   turned out. They have enough holes, enough  
10                  places that they can go out and they got 24  
11                  hours access to get out.

12                  Whenever you see a chicken house,  
13                  if you go down the road and check chicken  
14                  houses, whenever you see a chicken house that  
15                  is not very bare, you know that that door is  
16                  being shut. There is ways to try to convince  
17                  the chicken not to go out.

18                  MR. MOYER: Okay, thank you. One  
19                  follow up question. Predators, what do you do  
20                  for predators if your chickens are out 24/7?

21                  MR. YODER: We have hawk problems.  
22                  We have hawks that try to pick up a chicken,



1 but they can't. The chicken is too heavy.

2           They will get our pigeons and out  
3 pullets, we don't -- I don't let the pullets  
4 out until they're 12 weeks old, because before  
5 that, they're too young and the hawks come and  
6 carry them off.

7           About any other predators, if you  
8 make a good solid fence, netting fence, and  
9 you make a good solid in the bottom around,  
10 with two by sixes and you dig a little trench  
11 around it, there is no coon, skunk, possums,  
12 nothing else can get in.

13           MR. MOYER: Thank you.

14           MR. GIACOMINI: Okay, thank you.  
15 Natasha, Trudy and Mark with a proxy, go  
16 ahead.

17           MS. GILL: Hello, my name is  
18 Natasha Gill and I am the education and  
19 outreach director at the Marquette Food Co-op.  
20 We are consumer owned natural and organic  
21 grocery, located on the south shore of Lake  
22 Superior in Michigan's Upper Peninsula.

1                   We're owned by 3,000 households in  
2                   a city of 30,000 people. We're averaging one  
3                   new owner per day. We're growing, and this  
4                   success comes in the midst of an economic  
5                   downturn, in state wrought with financial  
6                   crisis.

7                   We currently have 44 employees,  
8                   yearly sales of \$4 million and a service area  
9                   of 16,452 square miles.

10                  We believe in and promote  
11                  certified organic products. In fact, it's  
12                  written into our purchasing policy. Myself  
13                  and my three employees in the education and  
14                  outreach department give multiple  
15                  presentations and teach classes, several per  
16                  week, to educate consumers on the importance  
17                  of purchasing organic.

18                  We also help consumers navigate  
19                  the ever changing and ever confusing world of  
20                  food labeling. I love my job. But I must  
21                  tell you that it's becoming harder and harder  
22                  to convince people that organic is the best

1 choice.

2 Consumers truly believe that by  
3 purchasing certified organic eggs, they're  
4 supporting a system in which the animals have  
5 access to pasture.

6 Whenever I talk to a group, I ask,  
7 "What does certified organic mean to you?"  
8 Animal welfare always comes up. They believe  
9 that they are making a choice, that benefits  
10 their personal health, the health of their  
11 families, the health of the planet, and the  
12 health and welfare of animals.

13 People purchase organic food  
14 because they want to be part of a different  
15 paradigm, one that does not support an  
16 industrialized food system.

17 I don't have hard and fast data or  
18 scientific evidence that consumers are losing  
19 confidence in the organic label, but I can  
20 tell you that this is, in fact, the case.

21 Our owners and customers are  
22 moving away from certified organic, when they

1 find out that organic doesn't mean what they  
2 thought it did. They feel misled. They're  
3 choosing to purchase local pastured product  
4 that comes from animals that are fed GMO feed,  
5 because access to pasture and humane treatment  
6 of animals is important.

7 Animal welfare standards and  
8 particular, those related to stock densities  
9 to pasture are absolutely critical in  
10 maintaining the integrity and encouraging the  
11 growth of an organic food system, and that's  
12 important, encouraging the growth of an  
13 organic food system.

14 We would like the NOSB Board to  
15 propose a new rule, prohibiting porches as  
16 outdoor access. This includes similar set ups  
17 with surfaces other than soil, such as wood,  
18 metal, concrete. This is not the outdoors.

19 Standards need to be adopted  
20 regarding mandatory access, as well as  
21 stocking densities.

22 In addition to working with

1 consumers, I am also the local farmer liaison  
2 for our co-op. Our office publishes the Upper  
3 Peninsula Farm Directory, supports countless  
4 farmers' markets, co-sponsors the Upper  
5 Peninsula farm conference. We're very involved  
6 with farmers. We're seen as being the  
7 authority on both local and organic issues in  
8 our area.

9 In fact, we even do site  
10 inspections at our local farms, so that we can  
11 stand behind the food and ensure its  
12 integrity.

13 Just last week, our grocery buyer  
14 traveled to Minnesota, to visit Larry Schultz  
15 farms. He is our only certified organic egg  
16 supplier. The cornucopia report that's been  
17 talked about today, actually, we have made a  
18 copy of that, blown it up and put it on the  
19 front of our egg cooler, because Larry Schultz  
20 actually was one of the farms that rated very,  
21 very highly in that particular report.

22 But we went there to see for

1       ourselves, what's going on at that farm. His  
2       birds do have access to pastures. If they  
3       didn't, we wouldn't sell them in our store.

4                I want you to know that I have a  
5       really hard time convincing, also, our local  
6       growers to become certified organic, because  
7       often times, they say to me, "Natasha, we feel  
8       like we're going above and beyond what's being  
9       expected of certified organic."

10               So, in many cases, they're  
11       believing that they set the bar higher. I  
12       find this to be incredibly disheartening. I  
13       want them to get to that status. I want them  
14       to understand the importance.

15               The bottom line is the health and  
16       safety of both the consumer and the animal.  
17       I think we can work together to set clear  
18       standards that set us apart from  
19       industrialized operations.

20               Thank you very much, to you, as a  
21       Board, for all the work that you do on behalf  
22       of organic growers, as well as consumers. I

1 really appreciate the opportunity to be here  
2 today and to share with you. It's very nice  
3 to have the public input. I've never been  
4 part of this process before, so I really  
5 appreciate this opportunity. I've learned a  
6 great deal, and I am more than happy to answer  
7 any comments or questions that you may throw  
8 at me.

9 MR. GIACOMINI: Comments or  
10 questions? Okay, thank you very much.

11 Trudy, Mark Kastel, the proxy and  
12 Greg Herbruck.

13 MS. BIALIC: Thank you, Miles.  
14 Thank you, and members of the NOSB. I'm glad  
15 for the opportunity to come and I've never  
16 been here, to an NOSB meeting before, but the  
17 matters that I want to talk about were so  
18 compelling to us that they put me on a plane,  
19 and here I am.

20 Trudy Bialic. I'm Director of  
21 Public Affairs at PCC Natural Markets. I've  
22 been there 18 years. I've been a dairy buyer.

1 I've been a merchandiser, member relations,  
2 marketing. My job now is consumer concerns,  
3 education and quality standards.

4 We started in 1953, as a buying  
5 club of 15 families in a basement and now, we  
6 have nine stores in five cities, with 47,000  
7 active member households, making us the  
8 largest consumer owned grocery retailer in the  
9 United States.

10 We have a very strong history of  
11 commitment to organic standards. During the  
12 1990's, I'm citing this as an example, when  
13 the standards were being developed, our  
14 members sent 27,000 comments to the USDA,  
15 about 10 percent of the national total.

16 Our commitment to organic remains  
17 strong. About 94 percent of our produce sold  
18 is organic now, 65 percent of our bulk is  
19 organic, and the reason is, is that is what  
20 consumers are demanding.

21 They're demanding to know the  
22 living conditions of livestock. They're



1 demanding pastured meat, pastured dairy,  
2 pastured eggs. This is where the market is  
3 already, and it's where it is going,  
4 increasingly.

5 Like Natasha said, we also are  
6 losing sales to pastured eggs. At farmers  
7 markets, I see familiar faces from our stores,  
8 faces that I've seen for years, shopping in  
9 our stores, who still shop in our stores, but  
10 they go to the farmers market, they go to the  
11 cheese monger shop in town, to buy pastured  
12 eggs, fed GMO corn and soy, but the questions  
13 are asking, what they want is that pasturing -  
14 - the living conditions are so paramount to  
15 them.

16 I read some of the claims being  
17 made to the NOSB over the past year, from some  
18 of the producers, that hens are confined  
19 indoors, for health, that being on soil,  
20 eating insects has no benefit, they don't have  
21 enough land to meet space requirements and  
22 because they've invested so much, they should

1 be grandfathered in.

2           Organic consumers generally are  
3 very sympathetic to challenges facing organic  
4 farmers. But the aversion to this confined  
5 feed lot model, which these operations are,  
6 exceeds any tolerance for compromised  
7 standards.

8           The NOSB's 2002 and 2009  
9 recommendations and the NOP's recent draft  
10 guidance are wholly in line with market demand  
11 and consumer expectations. Their surfaces  
12 other than soil, don't meet the intent of the  
13 standards. Hens must be encouraged to go  
14 outside. Exits must be distributed around a  
15 building, so that all of the birds can be  
16 outside and that all the birds may not be  
17 confined indoors, due to only the threat of  
18 disease.

19           So, our assessment is that  
20 consumers do not and will not accept such  
21 confinement of any organic animals, even if  
22 that makes it very difficult, if not

1 impossible, for some producers to keep their  
2 organic status.

3 Mis-judging the organic standards  
4 does not justify changing the standards to  
5 accommodate mistakes and wrong thinking. If  
6 a producer does not have enough land, it has  
7 a stocking and density problem.

8 Product labeling also has to be  
9 truthful. It is absolutely deceptive and  
10 misleading to show a little red barn and a  
11 pasture with chickens on grass, if that is not  
12 a fair representation of the operation, and I  
13 would ask the NOSB and the NOP to inquire with  
14 the FTC, about such deceptive advertising.

15 Finally, organic consumers do  
16 expect organic standards to address an animals  
17 time in transport and in slaughter conditions.

18 I'd love to share some more  
19 thoughts about what our supplier has been  
20 doing, considering that it is an industrial  
21 scale supplier with 125,000 chickens, but I do  
22 want to mention two other things, inerts.

1                   We know that they may be anything  
2                   but inert, and we feel that these compounds  
3                   must be reviewed to ensure their use does not  
4                   contaminate crops, soil or water, and we  
5                   encourage you to vote, to expedite  
6                   implementation of the guidance adopted by the  
7                   Board in April, and to limit use of former  
8                   list-for inerts to a three year time frame,  
9                   not five.

10                   Regarding nano-technology,  
11                   consumers are increasingly aware of this, and  
12                   I've been getting emails and calls about it,  
13                   for about a year or so. They're asking what  
14                   products and what packaging contains nano-  
15                   particles since they aren't labeled.

16                   It's contrary, nano-technology, we  
17                   feel, is absolutely contrary to the spirit and  
18                   the intent of OFPA, and we feel that it must  
19                   be declared a prohibited method of production,  
20                   and final, we feel that in general, consumers  
21                   should be able to know that organic is a safe  
22                   haven. Thank you.

1 MR. GIACOMINI: Thank you.

2 Questions or comments? Thank you. Next up,  
3 Mark Kastel with a proxy.

4 MR. KASTEL: Thank you, Mr.  
5 Chairman. Again, I'm Mark Kastel. I'm the  
6 Co-Director of the cornucopia institute. I  
7 have a proxy from Merrill Clark, who was a  
8 charter member of the NOSB livestock committee  
9 and its Chairman in 1992 to 1996, and she  
10 served on the cornucopia advisory panel.

11 First, I'd like to address the  
12 pointed comments by an industry consultant and  
13 former USDA employee.

14 What really hurt organic dairy  
15 farmers was the corporate take-over of organic  
16 dairy. Factory farms are now producing 30 to  
17 40 percent, I'm talking about dairies with  
18 over -- with 2,000 to 7,000 cows, 30 to 40  
19 percent of our nation's organic milk supply.

20 We're getting that under control  
21 and we do trust the current management at the  
22 USDA's organic program.

1           The family farmer scoff laws and  
2           the great recession is what hurt family  
3           farmers and drove some of them out of  
4           business, and worse.

5           We now, as a community, need to  
6           address the problems in the egg business,  
7           similar problems.

8           Before my shift to organic, I was  
9           involved in the corporate business. I worked  
10          for J.I. Case International Harvester, and in  
11          the mid 1980s, I owned and operated my own  
12          Case I.H. implement dealership in southeast  
13          Michigan.

14          I had a parts manager at the time,  
15          who had a bumper sticker on his truck, that  
16          said, "Dumb farmer. Dumb farmer."

17          If you diss the cornucopia  
18          institute, you are dissing Helen Kees, who  
19          stood here, our Board member today, multiple  
20          generation career farmer, who believes in  
21          organic, and you're dissing Bill Welch, who  
22          served on the Organic Standards Board and

1 Merrill Clark, and you're dissing our 4,000  
2 members at cornucopia.

3           These are not dumb farmers, and  
4 you can under estimate them at your own peril.  
5 I'm honored to follow Trudy and Natasha at  
6 this podium. This is a higher authority than  
7 the USDA in these matters, and that's the  
8 consumers in this country, and we better  
9 listen to them because no matter if you're a  
10 big company involved in organic or a small  
11 farmer, their confidence is what we live on.

12           Trudy, I don't know if you  
13 mentioned, represents the largest co-op in the  
14 United States with 40,000 members -- 47,000  
15 members. Natasha, as she said, is the go-to  
16 place for organics in a wide geographic area  
17 in the Upper Peninsula of Michigan. These are  
18 the folks that we need to retain their  
19 confidence.

20           So, I lost my place, I'm sorry.  
21 So, you can under estimate these folks, at  
22 your own peril. We're highly impressed, I

1 want to add this, with the current new  
2 management at the National Organic Program,  
3 and the Veteran and the new staff members.  
4 There is a heck of a team being assembled.  
5 We're governmental and corporate watch dogs.  
6 We're not lap dogs. So, we'll continue to have  
7 interaction, but for once, we have folks that  
8 not only respect the organic community, but  
9 are in turn, respected by the organic  
10 community.

11 This is a light year step forward  
12 to what we have had during the last -- during  
13 the Clinton and the Bush years.

14 I want to clarify a few things  
15 from earlier testimony. Charlotte, you asked  
16 her, there was a question from the Board, how  
17 much space, three square foot is a starting  
18 spot.

19 We already know that Organic  
20 Valley, which might be the largest name brand  
21 producer of eggs in this country, are  
22 requiring their farmers to have five square



1 feet. There is nothing wrong with that, and  
2 we know in Europe, it's considerably higher.

3 So, part of your narrative talked  
4 about rotating outdoor access to maintain  
5 cover and not become an environmental hazard.  
6 That can't be done at two and three square  
7 feet.

8 There was a question about the  
9 cost of eggs. Loren Yoder is making a fair  
10 profit, but they can't expand their business  
11 down at Farmers' Hen House, because they can't  
12 compete with these phony boloney confinement  
13 operations.

14 We will create opportunity for  
15 family farmers, and we will fill the  
16 marketplace with legitimate organic eggs, if  
17 you folks act, and I'm sure you're going to.

18 Consumers do expect organic birds  
19 to be outside, because many of them are  
20 sophisticated to know that's the law. So, we  
21 haven't done that research and hopefully,  
22 somebody else will, at some point, but Urvansi

1 said obviously, there is some data out there.

2 I wanted to add that we have a lot  
3 more of those photographs that I had, and they  
4 didn't reproduce very well on the projector.

5 If any Board members want to look at them on  
6 my laptop or have me email them to you, I'd be  
7 happy to, and the last point, if I can make  
8 it, on accessory nutrients is, vitamins and  
9 minerals were explicitly talked about by the  
10 Board, as being permitted and accessory  
11 nutrients, if they were one of two things,  
12 either required by Government EDIT, or  
13 recognized by an authoritative medical body  
14 and the oils by Martek, the synthetic oils  
15 that are in question, have never been  
16 recommended by an independent body and they  
17 are not required by law. Thank you.

18 MR. GIACOMINI: Questions or  
19 comments? Thank you. Greg Herbruck, Lisa  
20 McRoy, and who is after Lisa, Lisa? Diedre  
21 Birmingham, okay.

22 MR. HERBRUCK: Good afternoon. My

1 name is Greg Herbruck. I'm an organic egg  
2 producer with my brothers and sister in  
3 Michigan.

4 I'd like to comment on the animal  
5 living standards that you're proposing. I  
6 would like to state that we concur with the  
7 recommendations that some of them have been  
8 made in the 2009, specifically, where you were  
9 requiring formal relationship with a  
10 veterinarian.

11 We also agree with the prohibition  
12 of practices, such as debeaking and de-toeing,  
13 and feed withdrawal molting. These practices  
14 reflect appropriate review of science and  
15 acceptable practices.

16 And then the most recent  
17 discussion document, where it was suggested  
18 that 1.5 square foot of living space inside  
19 and 1.2 was adequate herd space was provided,  
20 again, is in step with the appropriate science  
21 and what goes on in the world.

22 I think as we look at what outside

1 standards should be, we need to consider  
2 potential conflicts with an FDA and safety  
3 rule that just went into effect in July of  
4 this year.

5 Specifically, 21 CFR 118.4, where  
6 the FDA is requiring farms to prevent access  
7 to rodents, and in the recent egg recall,  
8 Wright County was cited for not preventing --  
9 for having access holes in the sides of their  
10 building and allowing rodents access to the  
11 poultry inside.

12 I fear that some of the standards  
13 that we have set for, or then proposed, that  
14 the six square foot per 1,000 birds is perfect  
15 portal for access from rodents to easily go  
16 inside the poultry house and can be in direct  
17 conflict of what -- when an FDA inspector  
18 shows up, to inspect the farm, and then --  
19 that will include all farms over 3,000 hens.

20 I won't go over some of the other  
21 things that were submitted in my written  
22 comments. I would like to add that we were --

1 we had produced part of the research data for  
2 the methionine task force, for -- we did one  
3 test where we provided different stage levels  
4 of methionine inclusion and three square feet  
5 of outside access.

6 In each of these situations, it  
7 was mentioned earlier about the scratch area,  
8 the grassy area was completely denuded of all  
9 grass. This was a full summer long experiment  
10 and I guess if that's the goal for outside  
11 access, what is the goal of outside access?

12 If it is to provide these kind of  
13 areas, then this is a perfect petri dish for  
14 future infections. There was some science  
15 presented in my written comment for that.

16 If we're going to look at  
17 appropriate outside access, maybe we look at  
18 the European standards. It was mentioned  
19 earlier, we should follow them, 43 square  
20 foot, that's what they recommend. Is that a -  
21 - what's wrong with that?

22 I guess that would be the

1 challenges, if you need appropriate amount of  
2 area that does not become denuded of grass,  
3 then we should be thinking about supplying it.

4 I have just a couple of other  
5 comments. It was mentioned earlier today about  
6 GMO vaccines. I did kind of a check with some  
7 of the producers around and the suppliers.  
8 About 80 percent of the current vaccines that  
9 all of us are using would qualify as GMO and  
10 therefore, they protect against such viruses  
11 as salmonella, Marek's, infectious bursal  
12 disease, laryngeal tracheitis, Newcastle, pox  
13 and Mycoplasma gallisepticum.

14 The only ones not currently to be  
15 considered GMO would be for bronchitis and  
16 encephalomyelitis.

17 So, I guess as we look at -- as  
18 the committee considers where they're going to  
19 go with outside access, consider what every  
20 producer over 3,000 birds will receive, an  
21 inspection from the FDA and have to explain  
22 how they're preventing access of rodents and

1 non-poultry foul to their birds, and that's my  
2 conclusion.

3 MR. GIACOMINI: Thank you.

4 Questions or comments? Thank you very much.

5 Lisa McCorey, Diedre Birmingham and Troy  
6 Aykan. I don't see Lisa. Is Lisa here? Okay,  
7 moving on. Diedre and Troy, move one up and  
8 then John Baker.

9 MS. BIRMINGHAM: Thank you for the  
10 opportunity to address the committee on three  
11 materials that are critical to organic apple  
12 production among other tree fruits. These are  
13 pheromones, fixed copper and streptomycin.  
14 Your voting on these is deferred until further  
15 technical information is obtained.

16 I speak as a certified organic  
17 apple grower and one committed to organic  
18 integrity. For example, I'm President of the  
19 Board of the Organic Farming Research  
20 Foundation, and former Executive Director of  
21 Georgia Organics.

22 Pheromones. It is important to

1 first, distinguish between the use of  
2 pheromones in traps used to monitor insect  
3 populations and its use to control codling  
4 moths.

5 Traps are critical to determining  
6 if and when specific insect pests are present  
7 in orchards, such as codling moth, leaf-  
8 rollers and leaf-miners. The pheromone  
9 attract males to the traps, where counts can  
10 be taken weekly or daily. They are a key  
11 management tool to help us determine if and  
12 when any intervention should occur.

13 Pheromones are also used in  
14 codling moth control, a major pest of apples.  
15 Without the use of pheromones, you would not  
16 have apples produced organically in the upper  
17 Midwest and perhaps, the U.S.

18 For example, Professor Larry Gut  
19 at Michigan State University told me that all  
20 organic apple producers in Michigan rely on  
21 pheromone based main disruption for codling  
22 moth, and they would not be there if it were



1 removed.

2 Pheromones are not commonly  
3 sprayed, but are gradually released by  
4 dispensers that resemble a twist tie or  
5 puzzle piece placed in the upper limb of  
6 perimeter trees. The pheromone wave through  
7 the air and confuse males in their efforts to  
8 find a female.

9 The unmated females cannot lay  
10 eggs in the trees, which would hatch and eat  
11 into the fruit. To use natural pheromones, it  
12 would take extracting the pheromones from  
13 about four-million female codling moths to  
14 produce enough pheromone for one acre. This  
15 is cost prohibitive, thus we rely on  
16 synthetically produced ones.

17 Pheromone mating disruption allows  
18 growers of specialty crops with high pest  
19 populations to lower them in a non-toxic way  
20 and to decrease the use of other off-farm  
21 inputs to manage pests, such as codling moth.

22 Pheromones present no

1 environmental concerns and do not affect other  
2 animals in the system. They have no impact of  
3 our beneficial insect populations and they  
4 only confuse males of a specific insect pest.

5 Now, for fixed copper and  
6 streptomycin. These are two important tools  
7 to control fire blight. Fire blight is a  
8 lethal disease throughout the U.S.

9 When an 800 tree block that I  
10 graphed four or five years ago started -- or  
11 four or five years earlier, started to bloom,  
12 I lost about 100 of those trees in the first  
13 year of bloom.

14 Fixed copper is used if fire  
15 blight has been present in an orchard within  
16 the last two years. During winter, one cuts  
17 out the cankers, visible, and branches and  
18 trunks. A fixed copper spray, which is a  
19 slow release material, is applied only once in  
20 the early Spring, as buds swell. It kills  
21 fire blight that -- bacteria, that might be  
22 oozing from any remaining cankers or cuts, as

1 Spring progresses.

2 It is also effective against a  
3 major fungal disease, apple scab, by  
4 inhibiting the fungal sporulation in leaf-lair  
5 on the orchard floor.

6 As it is used only once a year in  
7 orchards warranting such, it does not bio-  
8 accumulate in the soil.

9 While fixed copper helps,  
10 streptomycin is the only effective tool to  
11 prevent fire blight. Fire blight attacks  
12 through the blossoms and proceeds into the  
13 branches and can go all the way to the tree  
14 roots, killing the tree, as it moves.

15 It is important to note the  
16 streptomycin is used only during bloom, when  
17 weather conditions warrant.

18 Growers feed temperature and  
19 moisture data into one or two computer based  
20 models to help predict when an infection will  
21 occur and the relative risk of the infection,  
22 such as low, medium or high. It is the only

1 product that works effectively because it's  
2 the only material that actually kills the  
3 bacteria.

4 Other biological materials  
5 available, whether allowed in organic systems  
6 or not, do not.

7 When other products are used, as  
8 my data, I have a handout available to you,  
9 from Michigan State University, shows more  
10 blossom and shoot light results. Infection  
11 spreads throughout the season, as pollinators,  
12 wind and rain progress.

13 One infection can keep an orchard  
14 at high risk for years to come, as I have  
15 found out. Streptomycin is an antibiotic  
16 derived from soil. It is not used in human  
17 health. It biodegrades in 72 hours. It does  
18 not leave any residue on the fruit, as it is  
19 used only at bloom. It does not impact other  
20 organisms in the orchard system. It may just  
21 sound bad to hear that an antibiotic is used  
22 in an organically managed system.

1                   While I have -- okay.

2                   MR. GIACOMINI: Questions or  
3                   comments? Joe?

4                   MR. SMILLIE: We had a previous  
5                   speaker that just talked about post infection  
6                   use of streptomycin. Is that your advocacy  
7                   position, also?

8                   MS. BIRMINGHAM: I actually like to  
9                   have it also available before an infection.  
10                  It's very hard to -- often, when you're going  
11                  to have a storm, you're having high winds and  
12                  you can't spray in the wind, and you have to  
13                  get it on in 24 hours.

14                  So, it's better to get it on  
15                  beforehand. You have -- it will be good for  
16                  72 hours. After that, you're no longer --  
17                  it's no longer reliable.

18                  When I see an infection coming, if  
19                  I'm going to have high winds prior to that  
20                  infection period, I put it on. If I can, I  
21                  might go in and apply it again, if I felt like  
22                  that 72 hour window was -- I was getting to

1 the end of it, and I'm trying to get some back  
2 action.

3 MR. GIACOMINI: Kevin?

4 MR. ENGELBERT: These materials  
5 that you're talking about haven't been  
6 available forever. What has caused these  
7 problems to suddenly surface and be unable to  
8 be dealt with, without them now?

9 I mean, is there any -- could  
10 there be any indications that there is  
11 something wrong with the soil that needs to be  
12 addressed, and therefore, these trees are  
13 weaker, because of their, you know, unhealthy  
14 soils, or anything like that? What's changed  
15 over the last 50 years, that all of the  
16 sudden, we no longer can have fruits grown  
17 without these three synthetics?

18 MS. BIRMINGHAM: I've never picked  
19 up that fire blight has not been an issue.  
20 Fire blight is endemic, even in your wild  
21 hosts, such as wild hawthorne, wild apple and  
22 other related species.

1           So, it's endemic in our natural  
2           environment. There are some resistant apple  
3           varieties, but they're very few and they're  
4           relatively unknown to consumers.

5           I mean, copper has traditionally  
6           been used and now, I -- my knowledge of the  
7           use is that it's only used in the early  
8           Spring, when buds swell, because if you use it  
9           later, you would get fruit damage.

10           MR. SMILLIE: I just wanted to add  
11           that before we had pheromone mating  
12           disruptions, we had worms in the apple. I  
13           mean, that was like sort of the old joke about  
14           organic, you know, and then pheromone matings  
15           were -- absolutely landmark decision by the  
16           OFPA to allow a synthetic pesticide, that was  
17           totally non-toxic and species specific, and  
18           it's the poster child of a good synthetic, and  
19           there has been no evidence the other way, and  
20           we all now have really great honey crisp  
21           apples with no worms in them.

22           MR. GIACOMINI: Okay, Jay?

1 MR. FELDMAN: Are you seeing any  
2 resistance to the antibiotics, to  
3 streptomycin?

4 MS. BIRMINGHAM: In Michigan, they  
5 have found pockets where there has been strep  
6 resistance developed. So, that's an issue and  
7 growers have to use it, very sparingly, and  
8 that's why you use it only when the conditions  
9 warrant, and should never spray it just to  
10 have it out there.

11 MR. GIACOMINI: Program?

12 MR. McEVOY: Yes, just as a point  
13 of reference, in Washington State, when I  
14 started as an organic inspector, in 1988,  
15 there were four certified organic orchards in  
16 the state, having about less than 100 acres in  
17 certified organic production.

18 Now, there is almost 10 percent of  
19 the apple acreage in Washington State is  
20 organic, tens of thousands of acres of organic  
21 fruit and a lot of that is because of mating  
22 disruption.



1           Without mating disruption, it was  
2 impossible -- well, not impossible, but very,  
3 very challenging to grow any quality organic  
4 apples, and the alternative, at the time, what  
5 the organic growers were using was Rainenia  
6 (phonetic), and Rainenia was sprayed a  
7 botanical, not very effective and they were  
8 spraying it ten to 14 times a year.

9           So, mating disruption has made a  
10 huge difference, in terms of reducing the  
11 amount of pesticides used in the Pacific  
12 Northwest.

13           MS. BIRMINGHAM: And just getting  
14 back to your question about the fire blight,  
15 and that when --I mean, one thing that we  
16 don't do in organic systems is supply a lot of  
17 nitrogen to the tree because you don't want a  
18 fast growing, because it particularly affects  
19 fast growing trees, and that's where it's hard  
20 to get an orchard started, because it's  
21 affecting young growing material.

22           So, your trees of like, three to

1 eight years of age are especially vulnerable.  
2 So, as orchards come into production or  
3 orchards are spreading or people are starting  
4 the orchards or replacing old varieties with  
5 new varieties, such as, everyone has to grow  
6 honey crisp, you know, then you do have this  
7 issue with young orchards.

8 I can't wait to get past the eight  
9 year stage and maybe some of my trees will  
10 survive. But if I -- the issue here also, is  
11 that you're going to back growers into a  
12 corner, saying either, it's my orchard or my  
13 certification.

14 I do grow some disease resistant  
15 varieties of apples. I have two varieties and  
16 I could just hug those trees, but I am  
17 producing apples to press and ferment juice,  
18 to hard cider.

19 So, I'm also growing some English  
20 and French cider varieties. They are like the  
21 wine grapes of apples. Those are susceptible  
22 to fire blight, and so, if I had strep taken

1 away from me now, I would probably lose that  
2 entire orchard. It is that variant, and we  
3 have just great conditions here for it to  
4 spread, and I'm also enhancing the pollinators  
5 in my orchard, the native pollinators, and  
6 they help spread the disease, unfortunately,  
7 too. Thank you.

8 MR. GIACOMINI: All right, Troy  
9 Aykan, John and Michael. Either Mike, we'll  
10 let you go on, either one is --

11 (Off the record comments.)

12 MR. GIACOMINI: Troy, you're up  
13 next. Go ahead.

14 MR. BAKER: My name is John Baker.  
15 My company, Giving Nature, contracts with  
16 organic producers in Central Pennsylvania, and  
17 then sells them under the Given Nature label  
18 in regional markets.

19 I have previously commented on  
20 consumers expectations, that organic eggs come  
21 from hens who have access to pasture. Today,  
22 I would like to take this opportunity to

1 address the Board on some of the concerns  
2 raised by those who would thwart the effort to  
3 allow organic laying hens access to true  
4 pasture and outdoor activity.

5 Mostly the concerns raised by  
6 those opposed to pasture layer organic  
7 production cite three issues, increased cost,  
8 the financial hardship that would come from  
9 making their current organic production layer  
10 operations obsolete and greater risk of avian  
11 diseases.

12 As attested to by those resistant  
13 to a strong pasture rule for organic laying  
14 hens, pasture layer operations cannot be  
15 supported in a large concentrated animal  
16 feeding operation or KFO production facility.

17 I couldn't agree more. It would  
18 cost more to do pasture organic egg  
19 production. Large KFO style production  
20 creates efficiencies of scale with which small  
21 pasture farmers cannot compete.

22 Many such small pasture farmers

1 have been driven out of the market by mono-  
2 culture of large scale organic egg producers.  
3 They are relegated to less lucrative markets,  
4 gone out of business, or worse, bankrupt.

5 Also, as a result of this large  
6 KFO organic egg production, new smaller bio-  
7 diverse farms are not being created, as there  
8 is no growing market to provide them  
9 opportunity.

10 This truth is self-evident in that  
11 the major of organic eggs sold on the market  
12 today come from large scale KFO facilities,  
13 all of it, a direct result of the vague  
14 outdoor access standards that some in this  
15 room successfully strove to create and some in  
16 this room are striving to change today.

17 The outside limit of number of  
18 laying hens per pasture facility appears to be  
19 around 12,000 layers. Medium to large KFO  
20 organic egg production of 32,000 hens, to the  
21 sky is the limit, allows for efficiencies of  
22 production that true pasture production cannot

1       achieve, due to economies of scale.

2                   But unlike bolts and screws,  
3       organic food is not a widget, even though in  
4       my opinion, this is what the current outdoor  
5       access standards have allowed many of the  
6       organic eggs produced in this country to  
7       become.

8                   Organic consumers increasingly  
9       recognize most current organic egg production  
10      as false and artificial at what it attempts to  
11      represent. There are those here today who  
12      will say that if well vegetated pasture  
13      becomes a mandated standard for organic egg  
14      layer operations, then the cost of organic  
15      eggs will be too high.

16                  However, it seems clear to many,  
17      who are also here today, that the issue is not  
18      cost, but rather integrity, and unless  
19      integrity comes from first in criteria of  
20      judging what is organic egg production, then  
21      the integrity of what it means to produce and  
22      sell organic eggs will be compromised.

1                   If we allow integrity to be  
2                   compromised, in such blatant ways as to raise  
3                   standards that support mono-culture factory  
4                   farming, then we have sacrificed our  
5                   credibility as producers of organic food.

6                   Current medium and large KFO  
7                   organic egg production cannot hope to meet an  
8                   organic pasture layer standard. Such an egg  
9                   production model is artificial in its intent,  
10                  when applied to organic values, and creates  
11                  artificially low cost of production.

12                  Current outdoor access standard  
13                  aids those who seek to make a false impression  
14                  by using the word `organic' to master a real  
15                  method of egg production, a method of  
16                  production that clearly, organic consumers  
17                  feel is not the way they expect their organic  
18                  eggs to be produced.

19                  It is my hope that the Board see  
20                  the issue before it clearly. The only thing  
21                  that could make organic eggs and organic  
22                  foods, in general, too costly is if the word

1       `organic' becomes nothing more than a  
2       marketing tool to void any real meaning and  
3       intent, that is to say, the void of integrity.

4               Next is the issue of financial  
5       hardship, that those with large scale  
6       production facilities say they will endure, if  
7       the standards are changed to require well  
8       vegetated pasture for organic laying hens.

9               The general consensus among these  
10       folks is that they will have no use for their  
11       very expensive cage-free egg production houses  
12       and will suffer such huge losses as to drive  
13       some of them into financial ruin. This, I  
14       find to be a false argument.

15               These same folks are very well  
16       aware of the growing cage-free egg market,  
17       which their facilities are perfectly suited.  
18       They're also aware that the State of  
19       California has mandated that all eggs produced  
20       and sold -- emphasis on sold, must come from  
21       cage-free eggs.

22               Now, Ohio is filing suit. Burger



1 King claims they cannot get enough eggs to  
2 fill their modest mandate that their annual  
3 egg purchase be comprised of at least five  
4 percent cage-free eggs.

5 The size of organic production,  
6 egg production, that the large scale organic  
7 egg producers represent seems large, when  
8 viewed through an organic perspective. But  
9 it's minuscule when viewed through mainstream  
10 business perspective.

11 California's new law and Burger  
12 King's needs alone are enough to absorb all  
13 the current large scale organic egg  
14 production, currently in operation into the  
15 cage-free egg market, if such care to make the  
16 effort.

17 Their current production capacity  
18 will hardly make a dent in cage-free egg  
19 demand, if they convert their production to  
20 that model. It is a market with more demand  
21 than supply. The only glitch seems to be a  
22 curious dynamic of retailers saying there

1 isn't enough and producers saying that there  
2 isn't a market.

3 I submit that cries of financial  
4 damages and hardship be balanced against this  
5 reality, and I have a little more, but I'll --

6 MR. GIACOMINI: Okay, thank you.

7 Questions or comments? Okay, seeing none.

8 You are -- is this -- I'm sorry?

9 (Off the record comments.)

10 MR. GIACOMINI: Who is this, again?

11 Is this Troy? Okay, Troy, Michael and Matt.

12 MR. AYKAN: Hi, my name is Troy  
13 Aykan. I'm a food scientist and a lawyer. I  
14 work for the Hain Celestial Group. I also  
15 teach food laws and regulations at Pomona and  
16 Chapman Universities in the Los Angeles area.

17 I just wanted to talk about  
18 briefly, access or nutrients that we -- a few  
19 speakers before, so, I'm not going to repeat  
20 the same stuff that they talked about.

21 As we know that under D3, we have  
22 21 nutrients, and under the proposed

1 interpretation of this section, only these  
2 nutrients would be allowed, and we know that  
3 under the 21 CFR 104.20, there are other  
4 sections that -- other nutrients may be added,  
5 as well. So, I'm not going to repeat the same  
6 stuff.

7 And so, just nutrients with  
8 established daily values, that are listed  
9 under 101.9, but don't exist under D3,  
10 examples, case study, infant formula, there  
11 are federally mandated nutrients, such as  
12 vitamin K and choline. These are also not  
13 under the D3 list, but federally mandated.

14 Then federally permitted  
15 nutrients, and widely accepted, recognized and  
16 expected by consumers, such as taurine,  
17 nucleotides, DHA and ARA, and there are also  
18 nutritionally inferiority argument, they are  
19 the organic food is the right way of the same  
20 nutrients as the conventional part, and the  
21 moms always the one to best nutrition for  
22 their babies.

1                   And the solution is that to allow  
2                   the correct interpretation of the section, or  
3                   defined the nutrients, as proposed here. All  
4                   nutrients listed under D3, all nutrients with  
5                   established daily values, under sub-section F,  
6                   E and other nutrients that may be properly  
7                   petitioned to the Board, and as such, if we  
8                   require companies to do petitions for each and  
9                   every nutrient, this would be really, an undue  
10                  burden on companies, on the NOSB and NOP, as  
11                  well, and the petition process could take  
12                  years, and the nutritional advances may be  
13                  found in conventional products, but not in  
14                  their organic counterparts, which may place  
15                  them in unfairly advantaged situation.

16                  So, that's my presentation. Any  
17                  questions?

18                  MR. GIACOMINI: Questions or  
19                  comments? Seeing none, thank you.

20                  MR. AYKAN: Thank you.

21                  MR. GIACOMINI: Okay, Joe?

22                  MR. SMILLIE: Was that posted, this

1 presentation, was that posted some place?

2 MR. AYKAN: No, I have all the  
3 copies, but miscalculated the time, so,  
4 they're in my room. I'll just bring it down.  
5 But they are not posted anywhere.

6 I made public comments, but this  
7 presentation, I have 20 copies. I'll just  
8 bring it down now.

9 MR. GIACOMINI: Okay, we'll be here  
10 for the next four days -- three days.

11 MR. AKYAN: Yes, yes, thank you.

12 (Off the record comments.)

13 MR. GIACOMINI: All right, Michael.  
14 Thank you, Troy, thank you. Michael?

15 MR. ARMY: Thank you. I would like  
16 to thank the National Organic Standards Board  
17 for this opportunity to comment today. I'm  
18 Michael Army. I'm President of Leonardo  
19 Academy. We're a charitable, non-profit,  
20 based here in Madison, dedicated to advancing  
21 sustainability. We work nationally and  
22 internationally, and my purpose today is to

1 give you an update on what we're doing.

2 We're working on a standard for  
3 sustainable agriculture, using the ANSI  
4 process and the work you've done and are doing  
5 is sort of a parallel of inter-connected  
6 universe.

7 The committee that -- to what  
8 we're doing. The committee we've put together  
9 is balanced across producers, users,  
10 environmentalists and also, general interest  
11 category, and we are working on developing a  
12 standard for sustainable agriculture that will  
13 be completed by some time in 2012.

14 The objective of our work is to  
15 establish a comprehensive, continual  
16 improvement frame work and a common set of  
17 economic, environmental and social metrics, by  
18 which to determine whether an agricultural  
19 crop has been produced in a sustainable  
20 manner.

21 We seek to deliver the completed  
22 standard, like I said, by 2012, and which

1 farms and producers in the U.S. can put to  
2 immediate use.

3 Additional agriculture sectors  
4 will be addressed in subsequent phases of our  
5 development process.

6 The benefits of this standard will  
7 be that agriculture producers will benefit by  
8 having access to a recognized sustainability  
9 set of tools and metrics for continued  
10 improvement in environmental, social and  
11 economic performance, which supports  
12 competitive advantage in the evolving global  
13 marketplace.

14 Secondly, rural communities will  
15 benefit from agricultural activities that  
16 build economic viability, support social  
17 justice and positively impact the environment.

18 Finally, buyers of agricultural  
19 products, such as processors, retailers and  
20 consumers will benefit from a national  
21 standard that reduces marketplace confusion  
22 associated with the proliferation of

1 sustainability standards and claims.

2 And in the materials I have  
3 provided, there are links to the wiki that has  
4 information on our process, as well as on our  
5 website, and if is interested in learning more  
6 about what we're doing, we'd be happy to hear  
7 from you. So, thank you for your time.

8 MR. GIACOMINI: Any questions or  
9 comments?

10 MR. MOYER: Thank you, Michael. I  
11 appreciate you being here and bringing that --  
12 and talking to us about that.

13 I guess one of the questions I  
14 might have, the Board might finding  
15 interesting, is how do you see this standard  
16 playing out in the marketplace, in terms of,  
17 we have an organic seal, we have some  
18 recognition in the marketplace, how are  
19 producers going to be rewarded? Is that going  
20 to be yet, another sticker that's stuck on a  
21 product? How do you see this playing out?

22 MR. ARMY: Sure, well, you know,



1 ultimately, all of these standards and  
2 certifications, etcetera, are evaluated and  
3 valued in the marketplace. I mean,  
4 ultimately, that's where these things get  
5 decided.

6 We think that one of the important  
7 values of this kind of standard is that  
8 purchasers of agricultural products are  
9 starting to put together many different  
10 standards of their own. Walmart is an  
11 example, but there are many others on this  
12 list, and we think in the end, the marketplace  
13 will be well served by standards that address  
14 the whole range of interests in the social,  
15 environmental and economic arenas, to find  
16 something that sort of works for all of the  
17 players, and I don't see this as displacing  
18 organic. It's just a different set of  
19 metrics, and I think it will, in the end,  
20 simplify life for producers, because instead  
21 of having to respond to, you know, 30 or 40 or  
22 50 different standards produced by particular

1 purchasers, saying, "This is what I want you  
2 to tell me about how you produce things," if  
3 we can make this a successful standard, and I  
4 believe we can, it will simplify that, so that  
5 there is a predominant standard or two, that  
6 can be used across the board in the  
7 agricultural industry.

8 MR. GIACOMINI: Joe?

9 MR. SMILLIE: For example, once the  
10 standard becomes live, would an organic --  
11 someone that's certified organic, would they  
12 have -- what kind of credentials does that  
13 count for, in compliance to your standard?

14 Is there any space in your  
15 standard that recognizes what they've already  
16 gone through in the organic certification  
17 process?

18 MR. ARMY: What we expect to happen  
19 is, once, you know, this is -- we have, you  
20 know, stronger people on the committee, and I  
21 see them moving forward, developing a standard  
22 that they think and believe, appropriately

1 addresses all the aspects of sustainability,  
2 once that's done, I think sort of the next  
3 step will be to look at the other standards  
4 out there, like the organic standard and other  
5 standards that are out there, and figure out  
6 which parts match up and which parts don't, so  
7 that there would be the ability to say, "Well,  
8 if you do -- you know, meet this standard,  
9 you've met maybe two-thirds of the  
10 sustainability standard."

11 I think ultimately, to make this  
12 work, we really have to simplify things for  
13 all of the players in the marketplace and that  
14 sort of translation is going to be really an  
15 important part of that, to make it practical.

16 MR. GIACOMINI: Anymore questions?

17 Okay, thank you.

18 MR. ARMY: Thank you.

19 MR. GIACOMINI: Next up is Matt,  
20 Renee and -- that's it? Okay, Matt, take the  
21 time you need.

22 MR. O'HAYER: My name Matt O'Hayer,

1 and I am the CEO of Vital Farms. Vital Farms  
2 is based in Austin, Texas. We are a group of  
3 family farms, producing a pastured raised  
4 organic egg.

5 What that means is that our birds  
6 live outside, during all daylight hours, on  
7 grass. They are not kept inside, with access  
8 to outdoors. They're kept outdoors, with  
9 access to indoors, in-climate weather and for  
10 night time predator production.

11 These birds, we currently have  
12 22,000, roughly, laying hens. They live on  
13 pasture. They eat pasture. They eat lots of  
14 grass. They are moved periodically, anywhere  
15 between two days and a week onto fresh  
16 pasture, and they leave behind well trimmed  
17 grass, -- with -- they eat just about anything  
18 in their sight, like birds love to do.

19 They are moved weekly, not only  
20 because they consume the grass, but to get off  
21 the pathogens, the manure that's left behind,  
22 and with one single rain, that pasture pops

1 right back.

2           These farmers that are working  
3 with us are for the most part, family farms.  
4 The flock sizes run anywhere from a small of  
5 about 200 to 300 birds in a single flock, up  
6 to possibly a maximum of about 2,000 birds.

7           Each one of the farms must follow  
8 our pasture raising procedures, which are very  
9 detailed, in order to be considered and to  
10 sell eggs to Vital Farms.

11           I believe it's really important  
12 that birds that are producing our income are  
13 treated as living creatures and not just as  
14 egg laying machines, and I see that happening  
15 a lot in the egg industry, as a whole, and I  
16 think our customers agree.

17           Treating birds with respect costs  
18 a lot more money. It's not a cheap process,  
19 and so, our eggs sell for more money, they  
20 cost more money to produce, to get them into  
21 the stores.

22           I believe that the industrial

1 producers that really believe that the  
2 consumers expect that organic eggs come from  
3 hens that are housed in barns or warehouses of  
4 10,000 to 100,000 each, with less than one  
5 square foot of space, barely able to spread  
6 their wings, that they really believe that  
7 these consumers believe that the birds are  
8 breathing air filled with ammonia gas and  
9 fecal dust all day long, standing on masses of  
10 their own manure, never having access to green  
11 pastures, unfiltered sunlight, then they  
12 should put pictures of these scenes on their  
13 labels and on their websites, because if  
14 that's what they really believe the consumer  
15 expects, then why not advertise that?

16 That's not what I see. What I see  
17 instead are scenes of bucolic farms with red  
18 barns and green pastures on their labels, with  
19 names like -- I'll change this a little bit,  
20 but 'My Grandma's Backyard Nest Eggs', there's  
21 no grandma, there's no backyard, or 'Uncle  
22 Louie's Wild Hen Ranch', that's another

1 favorite of mine, another industrial  
2 operation. There is no Uncle Louie, and the  
3 names go on and on.

4 They are all named ranches and  
5 farms. They're not named factory, you know,  
6 `So-and-So's Egg Factory', which is what they  
7 really should be.

8 So, if they really believe this,  
9 then that's the way they ought to be promoting  
10 it, but they don't believe it. They don't  
11 believe that's what the consumer is getting.

12 So, in other words, what they're  
13 doing is, they're lying to the consumer, and  
14 by supporting these lies, the NOSB and all the  
15 organizations are complacent in it.

16 I would implore the Board to set a  
17 requirement for equal space in outdoors and  
18 indoors, as a good start for organically  
19 certified laying hens. I'd also like to see,  
20 personally, that producers, that we do  
21 something about the phraseology, like `free  
22 roaming' or `free range', which are described

1 -- which are currently described as birds that  
2 are in warehouses, with little or no access to  
3 outside pasture, nothing but -- really, just  
4 nothing but a lie, and meant to mislead the  
5 consumers.

6           These types of things should be  
7 prohibited. The organic consumer expects to  
8 be told the truth. Any lies and misleading  
9 statements on labeling or hidden in the name  
10 itself, undermine the consumers' confidence in  
11 organic products, and hurts us all. Consumers  
12 aren't stupid. They ultimately find out  
13 what's going on.

14           They look at it today. They  
15 believe it at first. I've stood in egg  
16 departments in Whole Foods and in stores all  
17 over the country, and watch consumers, and I  
18 ask them, "Why did you buy those eggs?"  
19 "Well, they're organic. Tell me about that."

20           Well, the birds are outside, and  
21 we heard today, the testimony from -- I didn't  
22 get the woman's name, but she was with organic



1 -- consumer reports, 85 percent believed that  
2 the birds live in a natural environment.  
3 Seventy-seven percent of the consumers  
4 surveyed believed that they -- the birds have  
5 outdoor access, and are not confined. Sixty-  
6 six percent said they were not confined. I  
7 wrote those figures down. There was another  
8 couple of them. I'd love to get that report.  
9 But that's what consumers believe.

10 MR. GIACOMINI: Okay, questions or  
11 comments? Kevin?

12 MR. ENGELBERT: Thank you. Do you  
13 have any accurate estimates on what percentage  
14 of your birds feed comes from pasture and how  
15 much of it you provide through grain, and two,  
16 would you be willing to share your standards  
17 with the livestock committee?

18 MR. O'HAYER: There is no way to  
19 estimate how much. We like to think they're  
20 getting about a third of their diet from  
21 grass, but there is no -- obviously, no way to  
22 scientifically measure that.

1                   They go through there and they  
2                   eat, and sometimes -- and by cracking a dozen  
3                   of our eggs, you can see which birds are  
4                   eating more grass than others, because of the  
5                   color of the egg yolk and other measures.

6                   But there really isn't any good  
7                   way, but we know that when we put them on a --  
8                   we've put them in a small area, maybe a half  
9                   acre, 300 birds, with our fenced area, and we  
10                  move them constantly around the pasture in the  
11                  new areas, and they mow it right down. We'd  
12                  be happy to share whatever data we have.

13                  MR. GIACOMINI: Is your ration  
14                  formulated -- supplemental ration formulated  
15                  as complete feed, or do you make an assumption  
16                  for pasture?

17                  MR. O'HAYER: No, we make no  
18                  assumption for pasture.

19                  MR. GIACOMINI: So, it's as a  
20                  complete feed?

21                  MR. O'HAYER: Complete feed.

22                  MR. GIACOMINI: Okay, all right,

1 Kevin?

2 MR. ENGELBERT: So, do you add  
3 synthetic methionine then, to your rations?

4 MR. O'HAYER: There is a small  
5 amount in the product we're getting right now,  
6 from our supplier.

7 MR. ENGELBERT: Just as a safety  
8 precaution or do you know that you need it?

9 MR. O'HAYER: It's probably more of  
10 a safety precaution, because we don't know  
11 exactly how much they're getting from the  
12 pasture itself, and we've been told -- and  
13 quite frankly, we've been told that our layer  
14 eggs will drop precipitously, if we don't have  
15 it in there. It would be a great test, to  
16 find out.

17 MR. ENGELBERT: How much do you  
18 add, then, of that into your --

19 MR. O'HAYER: I don't add it. I  
20 think it's two pounds per ton, something like  
21 that.

22 MR. GIACOMINI: Katrina?

1 MS. HEINZE: Sorry, I can't face  
2 you. We heard earlier today that with the new  
3 FDA egg safety rule, that that would be a  
4 problem for egg farmers, like you. Do you  
5 have anything to say about that?

6 MR. O'HAYER: I find it hard to  
7 believe that a rat needs a six inch door -- a  
8 six foot door to get through to get into any  
9 building, anywhere. Any of us who have seen  
10 mice and rats in our houses, know that they  
11 don't need that kind of doorway to get in.  
12 They're going to get in, no matter what, and  
13 the filthier the conditions, the more likely  
14 they are to go in.

15 MS. HEINZE: I guess more my  
16 question, I have read the FDA inspection for  
17 the salmonella incident that happened this  
18 summer, and while FDA is trying to figure out  
19 how deal with eggs, they did comment on rats,  
20 and it's hard to imagine not having rats out  
21 in a field.

22 So, I'm just trying to figure out

1       how to reconcile those two things, or trying  
2       to figure out if you think that's going to be  
3       a concern or not.

4                   MR. O'HAYER: You know, I think  
5       rodents are always a concern, and you need to  
6       do what you can to trap them.

7                   We have never seen much problem at  
8       all in our farms with rodents, and just in the  
9       outdoor conditions.

10                   I believe in the case of Iowa,  
11       they had walls that were being pushed out by  
12       manure, piled six feet high, and that was  
13       creating an opening for rats to get in.

14                   MR. GIACOMINI: Jeff?

15                   MR. O'HAYER: But again, I don't  
16       know if I accurately answered your question,  
17       but it is a difficult -- we've read the  
18       standard and from what I can tell, they have  
19       an exception for pasture, in terms of their  
20       rules.

21                   MS. HEINZE: So, I just want to --  
22       here is what I heard you say, and you can tell

1 me if you agree or not.

2 What I heard was, you're aware of  
3 the egg safety rule. You don't think it will  
4 be a concern for facilities like yours?

5 MR. O'HAYER: That's correct.

6 MS. HEINZE: Okay, that's what I  
7 wanted to know. Thank you.

8 MR. GIACOMINI: Jeff?

9 MR. MOYER: I was just going to  
10 comment to Katrina, rather than a question.  
11 Typically, the rats aren't in the field,  
12 they're in the buildings. Rats don't live out  
13 in the open fields. They live in facilities,  
14 actually, under facilities, more likely that  
15 just in a field.

16 MS. HEINZE: I was just trying to  
17 get someone to say they didn't think it was  
18 going to be a concern.

19 MR. GIACOMINI: Jay?

20 MR. FELDMAN: Are you the folks  
21 that use the term `progressive pasture'?

22 MR. O'HAYER: Negative, in fact, I

1 was just looking at that label yesterday, and  
2 wondering if they -- if there was any validity  
3 to the pasture part of that. I saw that in a  
4 store -- progressive pasture, okay.

5 So, possibly, it is. You'd have  
6 to ask the people that use it.

7 MR. FELDMAN: Okay.

8 MR. O'HAYER: Any other questions?

9 MR. GIACOMINI: Interjection  
10 allowed, but no one comments about the Giants  
11 hat.

12 No more questions, I believe.  
13 Yes, final, Renee Randall.

14 MS. RANDALL: Hi, and good evening,  
15 and thank you for taking public comments.

16 I hope just because I'm last, this  
17 isn't the least of the considerations, because  
18 what I want to talk about is very generic, but  
19 very overarching to organic production, and  
20 what I'm going to do is just read what I  
21 wrote, first, and then hope for some  
22 interaction.

1                   My farm was first certified  
2                   organic in the early 70's. Even before I  
3                   started farming, I sought out organic product,  
4                   which was difficult then. The only assurance  
5                   in a marketplace that an apple was organic was  
6                   as somebody commented, up here, the basic  
7                   attractiveness of it and a handwritten sign  
8                   over the bin.

9                   The organic movement has come a  
10                  long way from that time and because it has  
11                  been a long and hard-won position, we  
12                  certainly need to protect its integrity.

13                 The rubber meets the road in the  
14                 marketplace when the consumer still, either  
15                 values the concept of organic or has at least,  
16                 a vague understanding of why it should be a  
17                 priority. If not, we've worked all these  
18                 years, only to find ourselves in a rather  
19                 small club of believers.

20                 As a producer, that sells into the  
21                 Chicago area, I have witnessed the countless  
22                 misuse of the word organic over the last



1 years. I believe we now had a situation, at  
2 least in that marketplace, where the value of  
3 organic production has been greatly  
4 diminished.

5 Words like sustainable and local  
6 that have really, yet no official definition,  
7 are trumping certified organic in the  
8 consumers mind.

9 Farmers are calling themselves  
10 organic when they are not certified and  
11 because there is no oversight and the consumer  
12 is left confused, they're doing so with  
13 impunity.

14 Reasons for not certifying are  
15 ones that consumers commensurate with, the  
16 Government took over again, thinking it's a  
17 lot of red tape and paperwork, or it costs so  
18 much. The result is now that there is a  
19 consumer base that feels being certified  
20 organic is understandably to be avoided by  
21 many farmers and businesses, if they are  
22 producing organically anyway.

1           In the past, if a producer called  
2 themselves organic, the consumer could always  
3 ask, "Are you certified," and that would be CS  
4 -- more, direct contact, CSA contact, farmers  
5 market contact.

6           Now, vendors at some of my best  
7 markets, and I'm in three markets in Chicago,  
8 are gaining certifications just as nebulous as  
9 the words `local' and `sustainable'.

10           There is now a certifier that is  
11 using farmers that are certified organic to  
12 certify a farm under their certification.

13           So, it's no wonder that the  
14 consumer is confused. I shared an event with  
15 -- I shared an event last year, with the  
16 business that boldly advertised local organic,  
17 in print advertising and on their delivery  
18 trucks. They told me, when I talked to them  
19 about this, that when they went to a farm,  
20 looked around, looked the farmer in the eye  
21 and the farmer said that they grow  
22 organically, well, then that was good enough

1 for them, and this was a business that was  
2 prospering and growing in leaps and bounds in  
3 Chicago.

4 To the other side of me, at the  
5 same event, was the largest CSA in Illinois,  
6 no longer certified organic, although organic  
7 is part of their business name. Their  
8 management was considering having their  
9 shareholders certify them.

10 So, what I'm seeing is a consumer  
11 that's confused and disillusioned with the  
12 idea of certified organic. I believe we need  
13 a campaign to remind and re-educate the  
14 consumer, as to why they want to seek out  
15 certified organic product.

16 Furthermore, there is no even  
17 playing field when certified organic growers  
18 and producers are the only ones held  
19 accountable for their organic standard status  
20 and there is really no enforcement for the use  
21 of the word `organic' outside the organic  
22 community.

1                   That's for sure, under five  
2 minutes.

3                   MR. GIACOMINI: Okay, questions or  
4 comments? Kevin?

5                   MR. ENGELBERT: Maybe I've read it  
6 and didn't get it. What's causing this lack  
7 of trust in the consumer -- the organic label?  
8 There are certifier's out there doing their  
9 job. There is a lot more enforcement taking  
10 place, as we know. What's caused the  
11 degradation of the word -- of the US --

12                  MS. RANDALL: I'm not saying that  
13 this is happening in all markets. I know it's  
14 happening in the area in which I sell to, and  
15 there is just no respect. There is -- they  
16 don't see the difference between certified  
17 organic and trusting a farmer that they see as  
18 growing -- I grow veggies, I grow produce.

19                  So, there doesn't seem to be any  
20 way they can ascertain what the difference is.  
21 There is just, I think, a lack of -- outside  
22 the organic community, a lack of education for

1 consumers, and right now, as I said on this  
2 little piece, local and sustainable is  
3 trumping certified organic.

4 I actually did a little survey  
5 this weekend at the markets, and nobody cared.  
6 There were two newly certified organic vendors  
7 at one of the biggest high end markets in the  
8 city, and their workers had no idea who  
9 certified them, couldn't talk much about what  
10 was going on, but they used the word organic  
11 very boldly. They were certified organic.

12 One of those vendors has a split  
13 operation and doesn't differentiate between  
14 what is coming from the certified organic farm  
15 and what isn't. The other vendor -- I want to  
16 use the term 'fake it until you make it', and  
17 that's happened a lot in this marketplace.

18 People are calling themselves  
19 organic until they get certified, and the  
20 consumer really doesn't know what to ask.  
21 They're just --

22 MR. ENGELBERT: Well, even though

1 this is the age of enforcement, the NOP can't  
2 put on a police staff and have you reported  
3 these to your certifier, these instances?

4 MS. RANDALL: Yes, yes.

5 MR. ENGELBERT: And did they deal  
6 with it?

7 MS. RANDALL: No.

8 MR. ENGELBERT: Because?

9 MS. RANDALL: Because they are not  
10 enforcing outside the organic community. They  
11 will enforce a certified organic grower --

12 MR. ENGELBERT: Does your certifier  
13 realize that these people are breaking the  
14 law, if they're claiming to be organic --

15 MS. RANDALL: Yes, in fact, I've  
16 gone to p- when this one business was  
17 advertising, and a now defunct free  
18 publication in Chicago, that Jim Slamo family  
19 farm once owned, it's called Conscious Choice,  
20 and this business was constantly advertising  
21 local organic and when I talked to the  
22 publisher, he said it wasn't his business to

1 please them.

2 He felt badly about this, but that  
3 wasn't his job. So, he continued to run the  
4 ads, in a publication called Conscious Choice.

5 MR. McEVOY: I would encourage you  
6 to file a complaint, or file multiple  
7 complaints. It sounds like you have many  
8 organic claims that are unsubstantiated.  
9 We've already issued six civil penalties of  
10 thousands of dollars, to uncertified  
11 operations that are making organic claims.

12 So, I would encourage you to file  
13 a complaint, at NOPcompliance@usda.gov, and  
14 we'll follow up on these.

15 MS. RANDALL: I just have a  
16 question about that. If it's a casual p- how  
17 would you place it, aside from the advertising  
18 part, where you can see it in print, or on a  
19 delivery truck? How would you p-

20 MR. GIACOMINI: That would be  
21 something you can deal with, with the program.  
22 That's their department of taking care of

1 those kinds of issues.

2 MS. RANDALL: Okay, thank you.

3 MR. GIACOMINI: Further questions  
4 or comments? Okay, we have no more speakers.  
5 Thank you very much. Any announcements or  
6 other things to deal with, before we recess,  
7 Tina?

8 MS. ELLOR: For those of you  
9 attending the Board dinner and the NOP, the  
10 restaurant, I have some maps here, if you're  
11 going to drive. Otherwise, there are shuttle  
12 leaving in five minutes, from the lobby. So,  
13 you know, that's the -- I've already postponed  
14 it once, and moved up the reservation. So, if  
15 everyone could be in the lobby as soon as  
16 possible, otherwise, get a map from me, if you  
17 want to find your own way there.

18 MR. GIACOMINI: Okay, 8:00 a.m.  
19 tomorrow morning, otherwise, we're in recess.  
20 Everyone, have a nice, safe evening.

21 (Whereupon, the above-entitled  
22 matter concluded at approximately 7:10 p.m.)



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Before: US Department of Agriculture

Date: 10-25-10

Place: Madison, Wisconsin

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*Neal R Gross*

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Court Reporter

**NEAL R. GROSS**

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