

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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THURSDAY  
APRIL 28, 2011

+ + + + +

The National Organic Standards Board convened, at 8:00 a.m., in the Emerald I Meeting Room at the Red Lion Hotel, 1514 Fifth Avenue, Seattle, Washington, Tracy Miedema, Chairperson, presiding.

MEMBERS PRESENT

TRACY MIEDEMA, Chairperson  
COLEHOUR BONDERA  
STEVE DEMURI  
JOSEPH DICKSON  
KRISTINE "TINA" ELLOR  
BARRY FLAMM  
JOHN FOSTER  
WENDY FULWIDER  
KATRINA HEINZE  
NICHOLAS MARAVELL  
ROBERT "MAC" STONE  
JENNIFER TAYLOR  
C. REUBEN WALKER

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STAFF PRESENT

MILES McEVOY, Deputy Administrator, National  
Organic Program

MELISSA BAILEY, Director, Standards  
Division, National Organic Program

LISA BRINES, Standards Division, National  
Organic Program

EMILY BROWN ROSEN, Standards Division,  
National Organic Program

LISA AHRAMJIAN, NOSB Executive Director

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

2 8:00 a.m.

3 CHAIR MIEDEMA: Good morning,  
4 everyone.

5 We have quorum, and we will go  
6 ahead and get back in session for day three of  
7 our spring 2011 meeting.

8 We have an announcement this  
9 morning from Deputy Administrator Miles McEvoy  
10 of the National Organic Program.

11 MR. McEVOY: Good morning.

12 We are making progress on more  
13 topics. We do have the proposed residue-  
14 testing rule that will be published in The  
15 Federal Register tomorrow. It goes on display  
16 today. The residue-testing rule meets the  
17 OFPA requirements outlined in the Organic Food  
18 Production Act, was identified in the OIG  
19 audit from last year as a missing piece of the  
20 requirements that certifiers have to conduct  
21 periodic residue testing.

22 The proposed rule will require

1 certifiers to collect and test from 5 percent  
2 of the operations that they certify, provides  
3 flexibility of who they choose to collect  
4 samples and tests. The testing is in addition  
5 to any targeted testing that they may be  
6 currently conducting. The sample collection  
7 must be done by a qualified third party.  
8 Certifiers must pay for the sampling and  
9 testing. We estimate that the cost of this  
10 will be less than 1 percent of their operating  
11 budget. We believe that this is very  
12 important to monitor compliance, to deter  
13 fraud, and to meet consumer expectations of  
14 what the certification process is all about.

15 So, we will have a press release  
16 out later today, and, then, the full rule will  
17 be published in The Federal Register tomorrow.

18 Thank you.

19 CHAIR MIEDEMA: Thank you.

20 Any questions for Miles?

21 (Laughter.)

22 MR. McEVOY: Any questions from

1 the Board?

2 (Laughter.)

3 CHAIR MIEDEMA: I will recognize  
4 Marty Mesh.

5 MR. MESH: What is the effective  
6 date of this proposed rule?

7 MR. McEVOY: There's no effective  
8 date. There's a comment period. So, we have  
9 a 60-day comment period that's open until June  
10 20th, yes, late June.

11 CHAIR MIEDEMA: Thank you, Miles.  
12 All right, let's proceed with  
13 public testimony.

14 The first speaker this morning is  
15 Jackie Von Ruden, and David Will is standing  
16 by.

17 MS. VON RUDEN: Jackie Von Ruden  
18 from MOSA.

19 Livestock guidance versus rule.  
20 The new pasture rule has added time to organic  
21 inspections, even on operations that are  
22 compliant. Although MOSA called for

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1 operations to provide pasture before the added  
2 pasture rule, we have accommodated and  
3 appreciated its elucidation of the  
4 requirements.

5 We have also been faced with  
6 animal welfare issues and confronted them as  
7 non-compliances without additional rulemaking.  
8 But we are still receptive to more  
9 specificity, particularly relating to organic  
10 poultry. There are comments in  
11 regulations.gov from certified poultry  
12 operations that claim their second-story  
13 aviary hens have outdoor access by going down  
14 ladders. Do hens really go up and down  
15 ladders?

16 At the same time we endorse more  
17 specificity so that certifiers and producers  
18 must meet basic tenets of animal welfare, we  
19 want to caution against so much specificity  
20 that a four-hour livestock inspection takes  
21 eight hours. Rule is rule, and guidance can  
22 serve to educate producers and inspectors on

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1 what management practices may need to change  
2 to meet the rule.

3 We do not want inspectors required  
4 to body score or lameness score every animal  
5 on an organic farm. But we believe that  
6 guidance documents like the example that we  
7 provided on sheep could help inspectors and  
8 certifiers identify the causes of an  
9 operation's deficiencies in meeting the  
10 requirements of feed, living conditions, and  
11 handling as related to animal welfare.

12 Transport, handling, and  
13 slaughter. MOSA is concerned that requiring  
14 slaughter plants to meet all FSIS  
15 requirements, including the Humane Slaughter  
16 Act, could eliminate the use of small plants  
17 that operate solely under state inspection.  
18 The Act does not specify the percentages noted  
19 in this recommendation, who is responsible for  
20 verifying those.

21 The Act does not address poultry  
22 slaughter. Poultry are covered in 9 CFR 381,

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1 which requires thorough bleeding and that  
2 breathing be stopped before scalding. Please  
3 consider our handout which describes slaughter  
4 requirements under these two regulations.

5 We also note that it is not clear  
6 who is responsible for verifying the  
7 percentages of livestock slips and falls.

8 Animal welfare. The revised  
9 animal welfare recommendation would require  
10 that calves over two months of age shall not  
11 be tied. This new proposal needs more farmer  
12 input on the impact to calf management. We  
13 have farmers who are doing an excellent job  
14 with calf-grazing systems utilizing tethers up  
15 to six months of age. The contradiction with  
16 the current rule which allows tethering up to  
17 six months would need to be reconciled.

18 More consideration needs to be  
19 given to space requirements. We maintain that  
20 the requirements for hogs and layers are too  
21 low. If organic layers are to go outside,  
22 pullets need to go outside before 12 weeks of

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1 age.

2 Crops. We do not support changing  
3 annotations of materials without adequate  
4 technical review. We support the relisting of  
5 tetracycline and streptomycin to allow for  
6 viable alternatives for fire blight control to  
7 be researched and developed for humid, as well  
8 as arid conditions.

9 And last, we have a pretty good  
10 and well-recognized materials reviews program,  
11 and we would welcome the opportunity to  
12 provide more input.

13 Thank you.

14 Any questions?

15 CHAIR MIEDEMA: Colehour?

16 MR. BONDERA: Thank you.

17 Sorry, but you spoke so fast and I  
18 just sat down. So, I am going to be a little  
19 slower. I apologize.

20 I think that the first thing that  
21 came to me, though, I would like to hear  
22 regarding livestock, because in your quick

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1 comments I didn't hear, at least clearly  
2 enough, how the issues that you raised could  
3 be improved. Like, do you have any  
4 suggestions or recommendations for "therefore,  
5 what?" Like you said something about guidance  
6 versus rules. So, what should happen?

7 And you mentioned how to get  
8 something about farmer input. It's like you  
9 didn't say how. And so, I just wonder if you  
10 could address -- I think my question is, how  
11 or what to improve or address those issues?  
12 That's my question.

13 MS. VON RUDEN: Specific to the  
14 line that was added at this meeting, the  
15 calves over two months of age shall not be  
16 tethered, that was added here. We haven't had  
17 time yet to ask our farmers whether or not  
18 that would impact their farming systems.

19 I have been on several farms -- I  
20 am an inspector as well -- where the tethering  
21 systems that they have are fantastic systems.  
22 I would really hate to see them not be able to

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1 do that.

2 So, I would like the opportunity  
3 to poll our 650 livestock farmers to find out  
4 what kind of an impact this line specifically  
5 would have.

6 But, in general, the added  
7 regulations of all of these specifics into the  
8 rule -- the rule is rule; we have to stand by  
9 it, but guidance could serve to provide the  
10 inspectors and the certifiers with just  
11 additional requirements -- no, not  
12 requirements -- additional guidelines that  
13 would help us assess whether or not the farms  
14 are meeting basic animal welfare principles.  
15 So, we would prefer to see a lot of things in  
16 guidance rather than specifics in the rule.

17 Does that answer your question?

18 Excellent.

19 CHAIR MIEDEMA: Any more  
20 questions? Mac?

21 MR. STONE: So, Jackie, the  
22 changes that we heard yesterday that, as you

1 say, haven't been sort of vetted out, back  
2 out, and in line with the guidance versus  
3 rulemaking, as a certifier, rulemaking is a  
4 deal-breaker versus guidance which allows  
5 certifiers to work with growers to develop  
6 these systems.

7 And I guess I am pretty concerned.  
8 I know we have been talking about it a long  
9 time, but a rush to judgment here can have  
10 such long-ranging impacts on the farm later  
11 and in the certifier office.

12 So, I guess I am mostly concurring  
13 with what you say, as a certifier, because it  
14 is a big deal that will last a long time.

15 MS. VON RUDEN: Yes.

16 MR. STONE: All right. Thank you.

17 MS. VON RUDEN: Thank you.

18 CHAIR MIEDEMA: Reuben?

19 MR. WALKER: You mentioned space  
20 requirement was too low. Was that for all  
21 species or were there any in particular?

22 MS. VON RUDEN: You might have

1 missed me saying layers and hogs.

2 MR. WALKER: Layers and hogs,  
3 okay.

4 MS. VON RUDEN: Those are the two  
5 areas that we feel need some work.

6 CHAIR MIEDEMA: Nick?

7 MR. MARAVELL: Yes, if you do go  
8 back out to your producers, could you also ask  
9 them a little bit about the paperwork  
10 requirements that would be necessary here? We  
11 heard some of that earlier, and I have been  
12 hearing that from farmers. So, if you develop  
13 any information on that, that would be helpful  
14 to the Board.

15 MS. VON RUDEN: Excellent. We  
16 would be happy to provide you with any  
17 information.

18 CHAIR MIEDEMA: Thank you.

19 MS. VON RUDEN: Thank you.

20 CHAIR MIEDEMA: David Will is up,  
21 and Paul Frey is standing by.

22 MR. WILL: Good morning.

1           My name is David Will, and I work  
2 for Chino Valley Ranchers.

3           While we don't own any organic  
4 chickens, we are owned by a husband and wife  
5 that own six different ranches that have  
6 organic layers and, in addition, we source  
7 product from 20 family-owned, single-barn  
8 farms.

9           Just to give you a little  
10 background, we have no aviary systems, and 100  
11 percent of our production is, from 1997, when  
12 we have been certified organic, has access to  
13 dirt or soil at all times.

14           I also want to personally thank a  
15 lot of the NOSB members and the NOP for this  
16 last little time you have gone out and visited  
17 some farms. And I know that you have seen  
18 some different styles of houses, and we  
19 appreciate the fact that you guys have taken  
20 the effort to educate yourself.

21           I really have three things I  
22 wanted to address. The first one was pullets

1 going outside at 12 weeks of age. We know  
2 that the document was originally written with  
3 an age to be out at six weeks, but now it has  
4 changed to 12. And if there is any way you  
5 can provide us, as an industry, any feedback,  
6 what that shift was, we would sure appreciate  
7 it because we still don't feel that 12 weeks  
8 is sufficient.

9           We all operate in different  
10 climates, environments, and have different  
11 challenges from those, due to disease and  
12 other things that can impact the health of the  
13 birds. We have all over years developed a  
14 vaccine program and schedule for our climate  
15 in order to allow us to have a chicken, when  
16 it reaches the environment where it is going  
17 to live for the rest of its life, to be able  
18 to be healthy and productive.

19           That is probably the most  
20 important thing that I wanted to get across to  
21 you guys, is that our goal is to develop and  
22 produce a healthy chicken that can go on for

1 a long and productive life.

2 The tantamount rule in farming is  
3 to take care and stewardship of your animals.  
4 And having us put birds out at 12 weeks is a  
5 new and interesting challenge for us because  
6 all of our experts tell us that it is just too  
7 soon, that the birds haven't worked up their  
8 time to get anything into their blood, and we  
9 still are finishing with major vaccines.

10 Also, Mr. Foster, I wanted to  
11 address a comment that you had made yesterday.  
12 You asked a specific question about what  
13 percentage of the birds would not comply to  
14 the outside access. I would like to challenge  
15 you guys to go and challenge the NOP, as you  
16 did with the Canadian equivalency standards,  
17 and actually go back and ask through the ACAs  
18 all of the producers to answer that question  
19 for you. Because, in my humble opinion, and  
20 just doing a grassroots poll, the number is  
21 shocking. I don't think it's insignificant at  
22 all.

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1           And, then, the last thing is you  
2           have a temperature regulation in there for low  
3           temperature, but you don't have one for high.  
4           We would like to propose you look at somewhere  
5           between 90 and 100 degrees for that.

6           How am I doing? Okay. And that's  
7           it. Thank you very much.

8           CHAIR MIEDEMA: Questions?

9           MS. FULWIDER: We went with the  
10          six weeks originally, and, then, we had  
11          changed it back to 18 for public comment.  
12          And, then, we had a lot of public comment that  
13          they felt it should be taken back to six weeks  
14          because there are producers that get them out  
15          when they are fully feathered and by six weeks  
16          of age without any problems.

17          And, also, the other species, we  
18          don't keep any other species indoors until  
19          they are adults because they might get sick if  
20          they are not fully vaccinated by the time they  
21          go outdoors.

22          And I guess I don't see any

1 problem with putting in a high temp, but I  
2 would assume the birds would choose to go back  
3 indoors or be in the shade when it is a high  
4 temperature. And so, that is why we did not  
5 address that.

6 MR. WILL: Okay. Yes, we just  
7 thought it was interesting you had one range  
8 and not a temperature to the other side. I  
9 appreciate the clarity on that, too, Ms.  
10 Fulwider.

11 CHAIR MIEDEMA: Colehour?

12 MR. BONDERA: Thank you, and thank  
13 you.

14 You know what struck me, and I  
15 want to ask you about, is just to clarify what  
16 I think I heard, which was that it seemed like  
17 what you were saying at the beginning is that  
18 all farms aren't the same, and that you can't  
19 easily just take numbers, whether they are  
20 temperature numbers or weeks, or whatever, and  
21 apply them everywhere.

22 And so, I just want to verify that

1 you were saying, you know, you need to make  
2 sure that this is more flexible and  
3 incorporates the whole range of truths. And  
4 I want to ask if that is an accurate  
5 interpretation.

6 MR. WILL: I think that is. Where  
7 I was going is that our main operations are in  
8 southern California. We don't have the  
9 benefits of freezes. So, we have a much more  
10 aggressive vaccination schedule than perhaps  
11 a company would in the Northeast or in  
12 northern Michigan, just because of the fact  
13 that they have a cleaner environment than we  
14 do.

15 It is also, in part, associated  
16 with who your neighbors are. There's a  
17 variety of different factors. None of us use  
18 the same vaccination schedule. None of us use  
19 the same timing between. We have all had to  
20 add some due to the new FDA egg rule, but we  
21 all have a different program that we have to  
22 follow that works for us.

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1 CHAIR MIEDEMA: Thank you.

2 MR. WILL: Thank you.

3 CHAIR MIEDEMA: Paul Frey is up  
4 next.

5 MR. FREY: Good morning.

6 My name is Paul Frey from Frey  
7 Winery, a winemaker at Frey Winery. We have  
8 been making organic non-sulfide wines for  
9 almost 30 years. I come from a family of 12.  
10 Mother and Father both medical doctors. And  
11 we have won over 300 awards on 100 wines over  
12 the last 13 years.

13 So, we are going to do a three-  
14 minute presentation on the 8,000-year history  
15 of non-sulfide winemaking.

16 (Laughter.)

17 Next slide, please.

18 There's no solid evidence that  
19 sulfur dioxide was really used in ancient  
20 times. Greeks and Romans didn't seem to use  
21 them. Most of the 8,000-year history was  
22 without sulfides.

1                   Many natural plant and mineral-  
2                   based additions were added to help  
3                   preservation, but they still considered the  
4                   best wines to be those without additions.

5                   A quote from Columella, AD 65, "We  
6                   regard the best wine as any that can keep  
7                   without preservatives."

8                   Strabo, AD 18, "Again, our valley  
9                   wine was excellent. It did not need to be  
10                  resinated and could be aged 50 years."

11                  They did use neutral pine resin as  
12                  a mild preservative. Natural preservatives  
13                  were sometimes needed in the past because they  
14                  did not have the use of hot water  
15                  sterilization, micron filtration, and zero  
16                  oxygen bottling, which is what modern organic  
17                  winemakers use today.

18                  Next slide, please.

19                  Sulfur dioxide use was  
20                  controversial from the very beginning. It  
21                  appears that around 1450 AD sulfur dioxide was  
22                  used, mostly to sanitize barrels. They soon

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1 realized that if you put enough sulfur in, it  
2 will stop unwanted fermentations. This isn't  
3 needed in today's world because sterile micron  
4 filtration does the same thing as sulfur  
5 dioxide.

6 After much controversy, they did  
7 allow very limited amounts of sulfur use. The  
8 rule stated you could only use it once because  
9 overuse of sulfur dioxide was hurting regional  
10 wine reputations. Burning sulfur once in a  
11 barrel leaves a small amount of sulfur; after  
12 a couple of years, approximately 10 parts per  
13 million.

14 Prohibitions against the use of  
15 sulfur in Germany in many towns.

16 Next slide, please.

17 From 1450 to the 1970s, sulfur  
18 wasn't really extensively accepted. In 1865,  
19 Jules Guyot says, "I cannot recommend it."  
20 Jules Chauvet, 1960, "Sulfur is not  
21 indispensable. The ideal would be not to use  
22 it."

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1           Organic grape growers and also a  
2 UC Davis professor are some of the early  
3 organic no-sulfur-dioxide winemaking pioneers  
4 of the seventies and eighties.

5           Next slide, please.

6           Conclusion: organic grape growing  
7 and winemaking, an 8,000-year success story.  
8 Total NOP wine grape acreage is about 12,000  
9 acres, equal to about 4 million cases or 50  
10 million bottles of wine, or about 1.5 percent  
11 of all wines sold.

12           Some of the bigger wineries only  
13 mention that it is organic on their websites,  
14 brochures, and tasting rooms because it is  
15 great PR. Other NOP wineries make from  
16 organically-grown grapes and, then, some add  
17 no sulfides just to give consumers a choice.

18           Any changes to organic standards  
19 should strengthen rather than weaken --

20           CHAIR MIEDEMA: Thank you.

21           MR. FREY: -- existing standards.

22           CHAIR MIEDEMA: Thank you very

1 much.

2 MR. FREY: Thank you.

3 CHAIR MIEDEMA: Any questions for  
4 Mr. Frey? Jay?

5 MR. FELDMAN: Can you tell us what  
6 the impact -- I have two questions. One is  
7 the issue of need, essentiality of the  
8 sulfites in producing the wine.

9 And, then, if we were to change  
10 what our existing practices are, what economic  
11 impact do you think that would have on you?

12 MR. FREY: Sulfites isn't needed  
13 in any winemaking in our approximately 30-year  
14 experience.

15 The second part I didn't quite  
16 understand.

17 MR. FELDMAN: If we were to change  
18 the rules as they currently exist --

19 MR. FREY: Meaning?

20 MR. FELDMAN: You know, the  
21 labeling, if the labeling were to change on  
22 wine.

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1 MR. FREY: Right. To where you  
2 had the USDA seal and, then, said contains  
3 sulfite?

4 MR. FELDMAN: Yes. What economic  
5 impact do you think or would that have any  
6 economic impact on those that are currently  
7 not using sulfites?

8 MR. FREY: Well, we believe it  
9 would have an economic impact on all of  
10 organics because it would water down the  
11 entire standards of organics. So, for all the  
12 other people that are making eggs and other  
13 things, the perception of organics would be  
14 harmed.

15 CHAIR MIEDEMA: Mr. Frey, one more  
16 question.

17 Steve?

18 MR. DeMURI: All other things  
19 being equal, if I took two bottles of wine  
20 side by side, everything else was exactly the  
21 same, variety, processing methods, bottling,  
22 everything, the one with sulfites and without,

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1 is there a difference in shelf life between  
2 the two?

3 MR. FREY: Not that we have found.  
4 We have opened 15-year-old Cabernet Sauvignon.  
5 It tastes outstanding. The wine you drank  
6 yesterday at the party, those were both non-  
7 sulfite, organic wines comparable to anything  
8 out there.

9 As I mentioned, 300 awards with  
10 100 wines over the last 13 years. These wines  
11 can stand up to any other wines out there in  
12 the marketplace.

13 CHAIR MIEDEMA: Steve?

14 MR. DeMURI: So, a quick followup.  
15 I want to make sure I understand. You are  
16 saying that there would not be any shelf-life  
17 difference between the two?

18 MR. FREY: Not that we have seen.  
19 And there is a statistic that says most wine  
20 that was drunk between six and twelve months,  
21 actually, a lot of people don't realize that,  
22 that the majority of all wines, a lot of

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1 people don't really hold wines, you know, red  
2 wines, for 10 years much anymore.

3 CHAIR MIEDEMA: Any more  
4 questions?

5 (No response.)

6 Thank you.

7 MR. FREY: Thank you.

8 CHAIR MIEDEMA: Todd Brendlin, you  
9 are up next. And, Christopher Ely is standing  
10 by.

11 MR. BRENDLIN: Good morning.

12 I'm Todd Brendlin, the Organic  
13 Production Manager of Grimmway Farms and Cal  
14 Organic Vegetables.

15 Natural Chilean nitrate or sodium  
16 nitrate has an available form of nitrogen like  
17 no other material and is a complement to other  
18 organic nitrogen sources that contain little  
19 or no nitrate.

20 We grow over 30 different  
21 vegetables year-round in five different  
22 regions of California. Sodium nitrate is

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1 especially crucial to the production of many  
2 of these vegetables during the months of  
3 December through February, when soil  
4 temperatures dip below 60 degrees and  
5 microbial activity slows down.

6 We anticipate that we will not be  
7 able to supply our customers with the quantity  
8 and quality of lettuce, spinach, green onions,  
9 and sprouts because they demand, if we cannot  
10 use the material.

11 I came to this meeting somewhat  
12 baffled by the two sodium nitrate  
13 recommendations from the Crops Committee. The  
14 two different votes seemed to contradict each  
15 other. I was relieved yesterday when I heard  
16 the Crops Committee discussion between, I  
17 believe, Mr. Maravell and others explaining  
18 that the first recommendation to be voted on  
19 will be the one to remove the annotation, and  
20 the second one is merely a backup, should the  
21 first one fail to pass.

22 This explanation relieved my

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1 concerns that the full Board would be robbed  
2 of a fair opportunity to choose whether to  
3 completely prohibit sodium nitrate or to allow  
4 current limited use. Considering the likely  
5 split-vote outcomes, it is easy to see that  
6 reversing the order of voting on the  
7 recommendations would change the entire  
8 situation to one in which the Board members  
9 would no longer have a fair choice, but would  
10 be forced to choose between completely  
11 prohibiting sodium nitrate or allowing  
12 unlimited use. In effect, this is not a  
13 choice at all since no one in the industry  
14 wants to see unlimited use.

15           Regarding liquid fertilizer  
16 alternatives mentioned by the Crops Committee,  
17 we have elected not to use them at this point  
18 in time because of concerns about the past  
19 synthetically-adulterated products on the  
20 market as well as the uncertainty of corn  
21 steep liquor being ruled as a synthetic.

22           The judicious use of sodium

1       nitrate    has proven to be a valuable  
2       contribution to the success of organic ag and  
3       Grimmway Farms.  It allows organic ag to  
4       improve its productivity, sustainability, and  
5       its potential to produce fresh food of high  
6       quality year-round.  Food production of high  
7       quality and in sufficient quantity is one of  
8       the most important objectives of organic ag.

9                We     support     relisting     sodium  
10       nitrate with the annotation.

11               Thank you.

12               CHAIR MIEDEMA:  Thank you.

13               Can we have a clarification from  
14       the Crops Committee Chair, John Foster, on how  
15       you expect the voting to proceed tomorrow?  I  
16       think there might be some confusion.

17               And if you need to, we can refer  
18       back to the process that we have all agreed  
19       on.

20               MR. FOSTER:  I would prefer to do  
21       that.

22               CHAIR MIEDEMA:  Okay.

1 MR. FOSTER: My head is not in the  
2 space of clarifying that kind of thing right  
3 now.

4 CHAIR MIEDEMA: No problem.

5 MR. FOSTER: I mean, honestly, I  
6 know we can get there.

7 CHAIR MIEDEMA: Sure.

8 MR. FOSTER: But, in this moment,  
9 it would not be a good thing, I don't think.

10 CHAIR MIEDEMA: No sweat.

11 (Laughter.)

12 Mr. Brendlin, I believe there's  
13 some confusion, and it resulted from the way  
14 the published recommended was organized. The  
15 voting procedure tomorrow will proceed like  
16 this:

17 All materials that have an  
18 annotation change during Sunset, the Sunset  
19 change has to be voted on after the material  
20 is initially has a chance to be relisted as  
21 is.

22 So, let me recap. Vote No. 1 is

1 to relist the material as is with the current  
2 annotation. Vote No. 2, in this situation,  
3 would be to remove the annotation, which,  
4 because of this place on the National List,  
5 has the effect of making the material  
6 completely prohibited.

7 There's nothing on the table,  
8 there's no motion that anyone has discussed so  
9 far being on the table tomorrow that provides  
10 for sodium nitrate to be used at the 100  
11 percent nutrient level.

12 MR. BRENDLIN: Okay. Thank you.

13 CHAIR MIEDEMA: Sure.

14 Any NOSB members need to check me  
15 on that? Do I have that right?

16 Jay?

17 MR. FELDMAN: I think our process  
18 is to vote first on the annotation and, then,  
19 vote to relist, so as to enable the material  
20 to remain on the list in the case of OMB and  
21 OP not being able to facilitate action before  
22 the expiration of the Sunset.

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1 CHAIR MIEDEMA: Katrina?

2 MS. HEINZE: I believe that is  
3 correct. That is what I had in my  
4 presentation on Tuesday, but I will verify in  
5 the actual policy.

6 CHAIR MIEDEMA: Okay.

7 MS. HEINZE: But I would concur  
8 with your statement that we have nothing on  
9 the table for tomorrow that would allow it  
10 unilaterally. So, I think that is probably  
11 the most important thing that you said.

12 CHAIR MIEDEMA: Right. Okay.  
13 This is a really important question that you  
14 raised. Over the very first break, we will  
15 get absolutely clear on that and make an  
16 announcement because it sounds like there's  
17 some real concern there.

18 MR. BRENDLIN: Okay. Thank you.

19 CHAIR MIEDEMA: Sure.

20 Any other questions?

21 (No response.)

22 Okay. Christopher Ely is up.

1 Steven Frenkel is standing by.

2 MR. ELY: Morning.

3 I am Christopher Ely, co-founder  
4 of Applegate Farms, and I am also a PACO-  
5 certified animal welfare auditor.

6 Applegate welcomes the idea of a  
7 single national organic animal welfare  
8 standard and congratulates the NOSB Livestock  
9 Committee for their hard work in the creation  
10 of the proposed standards.

11 Even though Applegate has posted a  
12 more detailed document regarding the proposed  
13 animal welfare standards, I would like to  
14 reiterate a portion of our posted comments.

15 Applegate has been working with  
16 organic and antibiotic-free livestock and  
17 poultry farmers since 1986. We have seen a  
18 full gamut of animal welfare practices and  
19 have learned what does and doesn't work. In  
20 the end, there are two categories of  
21 standards, science-based and perception-based,  
22 which at times can cause contradictions.

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1                   There is perception amongst the  
2                   general public, and even within the organic  
3                   community, that organic-handling and slaughter  
4                   standards address animal welfare at a much  
5                   higher level than commercial operations that  
6                   follow the AMI guidelines written by Dr.  
7                   Temple Grandin. This is not true.

8                   As much as it would be wonderful  
9                   to greatly distance organic from commercial  
10                  standards, the reality is you would be hard-  
11                  pressed to improve the present system of  
12                  measurable core criteria that is science-  
13                  based. It would not make sense to arbitrarily  
14                  add different audit criteria to slaughter  
15                  operations who are already using the standards  
16                  developed by respected experts in the  
17                  slaughter industry.

18                  Applegate commends the NOSB  
19                  Livestock Committee for recommending the  
20                  proposed livestock standards to adopt these  
21                  AMI standards. Most plants today are already  
22                  participating in at least one, if not more,

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1 third-party animal welfare slaughter audits on  
2 an annual basis. Organic auditors would only  
3 need to verify that the plant has had an AMI-  
4 based animal welfare audit on an annual basis  
5 and that that plant has passed the audit.

6 Our only concern are small state-  
7 inspected plants that generally do not adapt  
8 AMI standards and protocol and may not have  
9 annual animal welfare plant audits nor the  
10 proper resources to comply to these standards.

11 In the NOSB Livestock Committee  
12 document, the Proposed Recommendations Animal  
13 Handling, Transport, and Slaughter, as dated  
14 March 1st, 2011, it is stated in the section  
15 Slaughter Plant Audits that "Organic  
16 certifying agents can review documentation  
17 from these third-party animal welfare audits  
18 and can do an additional auditing as  
19 necessary."

20 Applegate feels this leaves a very  
21 gray open area of interpretation by certifying  
22 agents who are not properly trained in animal

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1 welfare by such organizations as PAACO. This  
2 could lead to unbalanced standards between  
3 certifying agencies who may interpret  
4 established welfare protocol, who may  
5 misinterpret -- excuse me -- established  
6 welfare protocol.

7 Applegate believes that science-  
8 based and perception-based standards are both  
9 important criteria to consider when proposing  
10 animal welfare standards --

11 CHAIR MIEDEMA: Thank you.

12 MR. ELY: -- but there is an  
13 abundance of science -- thank you.

14 CHAIR MIEDEMA: Does anyone have a  
15 question for Mr. Ely? Katrina?

16 MS. HEINZE: I am trying to figure  
17 out what that means you are asking us to do.  
18 It sounded like keep working on it. Am I  
19 correctly interpreting that?

20 MR. ELY: Yes.

21 MS. HEINZE: I know it was more  
22 detailed than that.

1 (Laughter.)

2 CHAIR MIEDEMA: Wendy?

3 MS. FULWIDER: I would like for  
4 you to propose some way to address this.

5 MR. ELY: Well, my biggest concern  
6 is the state-inspected plants. An example  
7 that I will use, that even federally-inspected  
8 plants, the very small ones, do not have the  
9 resources. When I have audited, I have  
10 occasionally failed them because they lacked  
11 the resources to have proper programs to pass  
12 their standards.

13 Having grown up in both the state-  
14 and federally-inspected meat industry, I have  
15 been at many state plants, and they are going  
16 to struggle. The bad part of that is much of  
17 the organic industry, the very small  
18 producers, need somebody like the state  
19 inspectors. It is important so that they can  
20 market their product. But I am not sure the  
21 resources are there for these standards to be  
22 passed by the state or by these state-

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1 inspected plants. So, I think that this is a  
2 real touchy area, and I am not quite sure what  
3 the answer is.

4 CHAIR MIEDEMA: Any other  
5 questions? Colehour?

6 MR. BONDERA: I am going to follow  
7 up on what you just said, which is you are not  
8 really sure what the answer is. And so, the  
9 implication I hear is, so let's figure out  
10 what the answer is or let's address it. Is  
11 that --

12 MR. ELY: Yes.

13 MR. BONDERA: What are you  
14 suggesting by saying that, is my question.

15 MR. ELY: Well, the standards, if  
16 small federal-inspected plants are having a  
17 hard enough time to pass the MI standards, I  
18 am not sure whether the state-inspected plants  
19 are even aware of some of these standards.  
20 They may be. And because they are doing a lot  
21 of what is referred to as "custom kill", they  
22 haven't followed them.

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1                   So, how do we get them onto that  
2 protocol to help the small organic growers?  
3 I don't have the answer to that. I just think  
4 it is something that hasn't been addressed and  
5 needs to be addressed.

6                   CHAIR MIEDEMA: Colehour?

7                   MR. BONDERA: Thank you. I  
8 understand what you are saying. You don't  
9 know how. I guess my followup question is, if  
10 you were in this position, what would you do?  
11 What would you do to seek that or pursue that  
12 or figure out how to deal with it? Any ideas  
13 of what you might do?

14                  MR. ELY: Well, if I was a small  
15 plant and I knew that I now had to follow AMI  
16 standards, I would probably have to hire  
17 somebody to teach me how to do it. So, there  
18 are people out there on occasion because some  
19 of the small federal plants use these people,  
20 and a lot of them are sometimes ex-USDA plant  
21 inspectors who no longer wanted to be  
22 inspector. They are now running this service

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1 and they teach them how to put together HACCP  
2 programs, and they teach them how to put  
3 together these -- can teach them the AMI  
4 standard.

5 But their plant themselves may not  
6 meet the standards, meaning that the equipment  
7 itself may be so archaic that they are going  
8 to struggle, and it is going to be a huge  
9 capital expenditure for them to update their  
10 plants to meet the standards.

11 CHAIR MIEDEMA: Mac, and then  
12 Nick, and then we will need to wrap up.

13 MR. STONE: I guess I would  
14 suggest that that is another additional burden  
15 that the certifier is going to have to take on  
16 to accomplish that on the producer's behalf,  
17 but working through that facility. It is  
18 going to follow the certifier at this point.

19 MR. MARAVELL: Yes, you referred  
20 to what the plants, small plants, state-  
21 inspected and small federal plants might have  
22 to do to come into compliance, so to speak.

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1       What is the possibility that they simply won't  
2       meet these standards and we won't have access  
3       to anything but custom kill, so to speak? Are  
4       you getting my drift here? Am I using the  
5       right words?

6                   MR. ELY: Well, if I understand  
7       it, you are saying that what they need is  
8       capital, and a lot of it, because the  
9       equipment is expensive.

10                   MR. MARAVELL: Right, and what I  
11       am saying is I know the plants I deal with,  
12       you know, they might just say I'm opting out  
13       of this. Then, what do I do?

14                   MR. ELY: Good question.

15                   CHAIR MIEDEMA: Thank you.

16                   Steven Frankel, you're up. Ron  
17       Christensen is standing by.

18                   MR. FRENKEL: Hi. I'm Steve  
19       Frenkel from Organic Vintages.

20                   We are probably one of the largest  
21       organic wine distributors in the U.S. at this  
22       time. We service the New York Metropolitan

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1 Region, licensed in New York, New Jersey, and  
2 Connecticut. And we just celebrated our 23rd  
3 year in business on April 1st. So, we have a  
4 lot of history behind selling and marketing  
5 organic wines.

6 We represent a large portfolio,  
7 representing more than 35 different wineries,  
8 including many that are true organic wines and  
9 have the USDA seal, and, then, many others in  
10 the made-with category.

11 It is my strong contention that it  
12 will be a big mistake to change the rule as it  
13 exists. We find that the majority of the  
14 wines we sell and that the retailers want and  
15 the consumers want are the ones that are  
16 organic with no sulfites with the USDA seal,  
17 the vast majority. Even though we make every  
18 effort to market the wines in the made-with  
19 categories well, and those sales for us have  
20 been growing over the years, we do pretty  
21 well; we represent lots of different made-with  
22 wines that are very, very good, but a lot of

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1 the consumers have tried both or some  
2 consumers who don't mind sulfites buy the  
3 made-with and are satisfied with them. We  
4 sell them to lots of restaurants, lots of  
5 stores as well, but some retailers only want  
6 USDA organic wines on their shelf and none in  
7 the made-with category, a lot of the smaller  
8 mom-and-pop stores, in particular.

9           Larger stores like Whole Foods  
10 that we sell to, they buy a range of our  
11 wines, and they feel that the consumers can  
12 tell the difference. They look at a label;  
13 they can see what they are looking for. If it  
14 says "USDA", that gives them the trust and  
15 confidence that they are buying the wine they  
16 want.

17           Others don't mind the sulfites.  
18 They want to try different wines, and they buy  
19 the made-with, and they are happy to see "made  
20 with organic grapes".

21           I don't think it would make a  
22 difference in sales. I know someone asked

1 about the impact, the economic impact, of  
2 changing the rule. I really don't think it  
3 would help the sales of the made-with category  
4 significantly. And, yet, I think it would be  
5 not a good idea. I think that the made-with  
6 winemakers, hopefully, can move in the  
7 direction of making wines without sulfites  
8 because you can make world-class wines without  
9 sulfites. Currently, that is the way it is.  
10 There are some really good winemakers out  
11 there making these USDA wines with no sulfites  
12 that are really very high quality and winning  
13 awards, and so on.

14 For example, a very small producer  
15 we represent, Coates Vineyards, makes barrel-  
16 aged organic wines with no sulfites that they  
17 are just great. They are European in style.  
18 People really like them. We have a lot of  
19 good fans. They are not inexpensive because  
20 he is using American and French oak.

21 CHAIR MIEDEMA: Thank you.

22 MR. FRENKEL: So, he is spending

1 some money on it.

2 CHAIR MIEDEMA: Any questions?

3 Let's start with Katrina, then Jay, then Nick.

4 MS. HEINZE: I have two questions.

5 MR. FRENKEL: Sure.

6 MS. HEINZE: So, I will give them  
7 both.

8 So, the first is sulfites, do they  
9 have to be labeled or not in wine? We have  
10 covered this before. I just can't remember.

11 And, then, the second is, do you  
12 think consumers -- and this would be a  
13 hypothesis on your part -- prefer the USDA-  
14 certified because it is 95 percent or because  
15 of the no sulfites?

16 MR. FRENKEL: The regulation,  
17 federal regulation, requires that "contains  
18 sulfites" must be put on a label if it  
19 contains more than 10 parts per million  
20 sulfites. So, that is one requirement.

21 And as far as the rule right now,  
22 organic wine must have 100 percent

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1 organically-grown grapes and processed  
2 organically with no sulfites.

3 CHAIR MIEDEMA: Jay?

4 MR. FELDMAN: I am interested in  
5 the comment you made about the industry moving  
6 more toward 100 percent as a result of this  
7 label. If we had, say, started out with the  
8 USDA organic label, allowing sulfites and  
9 disclosure or notification of sulfites, do you  
10 think there would be any pressure to move  
11 toward no sulfites? Or how do you think the  
12 industry would have evolved or would evolve in  
13 that situation?

14 MR. FRENKEL: Well, I think what  
15 you are implying is truth. I think that there  
16 would have been less pressure and less  
17 motivation for a number of winemakers to learn  
18 how to make wines without sulfites. Because  
19 there is a learning curve like in anything,  
20 and more and more winemakers are going in that  
21 direction. We just started marketing some  
22 imported wines from Italy with no sulfites

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1 that are very well made and, also, one from  
2 Spain now that has come out. And Chile has  
3 one coming out. And there are many countries,  
4 and, then, in the U.S. many winemakers are  
5 experimenting with making wines without  
6 sulfites, and I think partly because of  
7 wanting to move in that direction.

8 CHAIR MIEDEMA: Nick?

9 MR. MARAVELL: Yes, you made a  
10 statement that you didn't think this would  
11 make a difference in sales and, then, you  
12 qualified that by saying it would not help  
13 sales of made-with wines. Do you think it  
14 could hurt sales in any way, if a change were  
15 made?

16 MR. FRENKEL: Yes. Possibly what  
17 could happen, what I am afraid of is that the  
18 consumer could be fooled into thinking the  
19 wine that they are looking for that has the  
20 USDA seal on it, and that they know is pure,  
21 100 percent pure as far as they are concerned  
22 without any sulfites, and so on, if it now had

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1 a wine labeled with a USDA seal that did  
2 contain sulfites and it was hidden on the back  
3 label, which nowadays they are putting  
4 "contains sulfites" on the back of the label  
5 instead on the front, and so on, people could  
6 be misled. It could create problems and  
7 confusion.

8 CHAIR MIEDEMA: Nick?

9 MR. MARAVELL: So, I didn't  
10 realize that. So that, made with sulfite can  
11 be on the back of the label and the USDA seal  
12 could be on the front of the label, is that  
13 correct?

14 MR. FRENKEL: Yes. Now I don't  
15 know if -- anyway, yes, that is my current,  
16 saying that the TTB requires "contains  
17 sulfites" on the label, but now many  
18 winemakers are putting it on the back.

19 MR. McEVOY: Point of  
20 clarification: with made-with products, if  
21 you add sulfites to wine, you can't use the  
22 USDA seal.

1 MR. MARAVELL: No, right now, yes.  
2 Would that situation change if we were to  
3 change the rule? That is what I was talking  
4 about.

5 MR. McEVOY: Yes, if you allowed  
6 sulfites in wine, in organic wine, then, yes,  
7 you could use the USDA seal.

8 MR. MARAVELL: And, then, the  
9 "contains sulfite" would be on the back of the  
10 label?

11 MR. McEVOY: We will check into  
12 that.

13 MR. MARAVELL: Thank you.

14 MR. FRENKEL: Thank you.

15 CHAIR MIEDEMA: Ron Christensen is  
16 up. Matthew Miller is standing by.

17 David Gard, are you here?

18 MR. GARD: Yes.

19 CHAIR MIEDEMA: Please come up and  
20 wait in the standing-by section.

21 MR. CHRISTENSEN: If I can direct  
22 your attention to the slides, welcome Idalou

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1 Egg Ranch. I am Ron Christensen.

2 This is our ranch. Some of you  
3 haven't been able to make it, but I will bring  
4 it to you then.

5 In the foreground, we have our  
6 hair sheep ewes and our lambs. We have  
7 organic pecans in the back. We have are baby  
8 chick houses in the back.

9 Next slide.

10 Our ewes and lambs grazing on  
11 winter wheat.

12 Next slide.

13 We compost all our waste.

14 Next slide.

15 What I am here for, though, is  
16 outdoor access. These are our houses  
17 comparing a couple of things. One, we have  
18 10,000 birds on the inside of our houses. You  
19 will not see any more than 2,000 birds, or 20  
20 percent of the birds, out at any one time in  
21 these slides. So, every bird out there is  
22 getting at least five feet per bird or more.

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1           Also, compare house 12, house 31  
2           access doors. House 13 on the right has only  
3           six. We did an experiment to see if access  
4           doors made the birds want to come out more.  
5           It did not.

6           Next slide.

7           This is now nine o'clock. The  
8           birds are out a little more. But, still, it  
9           looks like 13 with six doors has more than 31  
10          with 31 doors. Also, there is no more than  
11          2,000 birds out there.

12          Next slide.

13          This is 10 o'clock.

14          Next slide.

15          Here's indoors, fully lit, sunlit  
16          houses, curtain sided. Birds go up and down  
17          to the water, across the house, inside and  
18          out, as they need. We are really proud of  
19          what we do there.

20          Next slide.

21          Eleven o'clock, 12 and 13, minimum  
22          birds out, over five feet bird you're seeing

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1       there.

2               Next slide.

3               Next slide.

4               One o'clock.

5               Next slide.

6               Two o'clock.

7               Next slide.

8               Three o'clock, the birds are  
9 coming in and out as they desire. Their doors  
10 are always open.

11              Next slide.

12              Sunshine finally comes out today,  
13 and the birds are in and out.

14              Next slide.

15              Remember, we have got 10 feet per  
16 bird right there with the number of birds  
17 outside.

18              Next slide.

19              Indoors at five o'clock, again,  
20 sunlit, beautiful, good air quality. The  
21 birds want to be inside. It is a great place.

22              Next slide.

1                   Six o'clock.

2                   Next slide.

3                   Seven o'clock.

4                   Next slide.

5                   The sun is going down. The birds  
6 are outside more. Still no more than 20  
7 percent of the birds are outside. Five feet  
8 per bird is given.

9                   Next slide.

10                  This slide is thrown out. Some  
11 people say the birds have to be trained. This  
12 is the birds' first day out. These birds are  
13 22 weeks of age, as our vaccination program  
14 and our plan, we can have them inside until  
15 that day. This is the first day out. You  
16 will see they have no problem coming outside  
17 and enjoying the great outdoors.

18                  Next slide.

19                  This is the same houses at four  
20 o'clock. The older birds have learned that  
21 they like to be inside a little more at that  
22 same time of day. The same day, just

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1 different ages.

2 Next slide.

3 Thank you. A beautiful sunset in  
4 west Texas.

5 I would like to just say please  
6 reconsider. Your two feet per bird is based  
7 on birds housed. And as you can see, we would  
8 be totally out of compliance. We only have  
9 1.2 feet per bird outside --

10 CHAIR MIEDEMA: Thank you.

11 MR. CHRISTENSEN: -- and 1.2 for a  
12 bird inside. And the two feet per bird on  
13 birds housed makes us woefully inadequate.

14 CHAIR MIEDEMA: Thank you, sir.

15 MR. CHRISTENSEN: Thank you.

16 CHAIR MIEDEMA: Joe Dickson?

17 MR. CHRISTENSEN: Yes, Joseph?

18 MR. DICKSON: Thank you very  
19 much.

20 You showed us sort of your  
21 experiment where you tried different sort of  
22 amounts of access to the outdoors, like in

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1 terms of like the linear feet of door, and saw  
2 that there was very little difference there.  
3 Have you tried the placement of food and water  
4 outside, and does that have any bearing on the  
5 birds that go outside?

6 MR. CHRISTENSEN: No, we haven't  
7 done anything with the extra feed and water.  
8 That is all in the indoors.

9 MR. DICKSON: Thank you.

10 CHAIR MIEDEMA: Any more  
11 questions?

12 (No response.)

13 Thanks very much.

14 Matthew Miller, you are up next.  
15 Oh, okay, and, then, David Gard is still  
16 standing by.

17 MR. MILLER: Thank you, NOSB  
18 members, for your commitment to organic  
19 standards and allowing me the opportunity to  
20 provide input on the proposed animal welfare,  
21 transit, and slaughtering regulations.

22 I am Matthew Miller from Iowa.



1 For the past seven years, as my full-time  
2 occupation, I have conducted over 1600 organic  
3 inspections of various operations, including  
4 livestock, crops, and processing plants in the  
5 upper Midwest.

6 I do not have a personal vested  
7 interest in this debate. Here's my criticism:  
8 you are turning organic livestock production  
9 into some new form of Puritanism.

10 And here's what I mean by  
11 Puritanism that comes to mind: you are making  
12 a big deal out of something very small. You  
13 are being overly legalistic. The Salem witch  
14 trials, prohibition in the 1920s, and debating  
15 the length of women's dresses are things that  
16 come to mind.

17 Organic production is tiny. Only  
18 1 out of every 100,000 pigs in the U.S. are  
19 certified organic. One Iowa farmer could  
20 raise, if these pigs are conventional, could  
21 raise all the pigs in four typical confinement  
22 barns. There is only 1 in every 10,000

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1 broilers in the U.S. that are certified  
2 organic. Only 1 in 10,000 lambs in the U.S.  
3 are certified organic. For hens, it is a  
4 little higher, 1.5 percent. This is tiny.

5 The other thing that is a problem  
6 is that these proposals are not going to be  
7 criticized too much by our farmers because  
8 they are common sense. It is in the best  
9 interest of the farmers to provide the best  
10 environment for their animals. And I guess  
11 the problem we have is with codifying it.

12 Basically, in order to save time,  
13 Jackie Von Ruden from MOSA, I want to  
14 rubberstamp what her concerns were about 1500  
15 times because she hit the nail on the head.  
16 This is going to increase the cost of  
17 certification for our producers. And  
18 especially small producers are going to be  
19 hurt worse.

20 The man from Applegate Farm  
21 alluded to that by saying that the small  
22 processing plants are going to be hurt the

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1 worst, and he doesn't know if they can comply  
2 with it.

3 The other thing is that these  
4 prescriptive regulations are demeaning to  
5 farmers because they basically imply that  
6 farmers have no common sense that they will do  
7 the right thing. On the other hand, it also  
8 shows how naive some people are about  
9 commercial livestock production.

10 The other thing about Puritans is  
11 they create these false devils to attack. And  
12 this time it is not drinking alcohol, but from  
13 listening to your discussion yesterday on  
14 ethylene gas and, also, reading Cornucopia's  
15 report, our devil is large organic production.

16 From my experience of visiting  
17 large farms and small farms, the large farms  
18 try to more perfectly meet the organic  
19 regulation. And what's going to happen is  
20 that --

21 CHAIR MIEDEMA: Thank you, sir.

22 MR. MILLER: -- the livestock

1 producers, the crop producers --

2 CHAIR MIEDEMA: Thank you.

3 MR. MILLER: -- are going to be  
4 hurt.

5 Go ahead. What are your  
6 questions?

7 (Laughter.)

8 CHAIR MIEDEMA: Jay Feldman?

9 MR. FELDMAN: Well, because of  
10 your enthusiasm, I will ask you a question --

11 MR. MILLER: Sure.

12 MR. FELDMAN: -- which will give  
13 you more time to continue.

14 (Laughter.)

15 MR. MILLER: Okay. Well, the  
16 other thought is --

17 MR. FELDMAN: I haven't asked my  
18 question yet.

19 (Laughter.)

20 MR. MILLER: Okay. Sorry.

21 (Laughter.)

22 MR. FELDMAN: You know, your

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1       comments sort of remind me of 30 years ago  
2       when we sat around and talked about organic,  
3       they told us it was a pipedream and it  
4       couldn't happen commercially. So, it is not  
5       convincing to me to hear that people who have  
6       aspirations and visions about things being  
7       different, that it can't happen. So, within  
8       that mindset, I ask you this question.

9                       MR. MILLER: Okay.

10                      MR. FELDMAN: If we believe our  
11       consumers have expectations for what they are  
12       paying for, and how operations operate, how do  
13       we balance that with your perception of how  
14       things are? How do we balance the perception  
15       or the consumer perception of what organic is  
16       with the reality of how things are going?

17                      So, my point is, could you  
18       envision, despite the way things are, that we  
19       could move closer to consumer expectations or  
20       what we perceive to be consumer expectations?

21                      MR. MILLER: A very good question,  
22       Jay.

1           There is already organizations out  
2 there, such as Global Animal Partnerships,  
3 Certified Humane, and other organizations,  
4 that put a lot of work into animal welfare  
5 standards. And there are organic products out  
6 there that carry both seals.

7           And I think that it makes the most  
8 sense to utilize those type of organizations  
9 to meet that customer demand that you are  
10 talking about. But, remember, organic is  
11 tiny, and so we are nitpicking really. We  
12 want to grow this.

13           Go ahead.

14           Oh, you've got to be called on.

15           I'm sorry.

16           (Laughter.)

17           CHAIR MIEDEMA: Please proceed.

18           MR. MARAVELL: There are other  
19 organizations out there oriented towards  
20 animal welfare.

21           MR. MILLER: Yes.

22           MR. MARAVELL: And as you just

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1 pointed out, some products carry both seals,  
2 organic and a welfare seal.

3 How would that impact on the total  
4 amount of cost to the producer and the total  
5 amount of paperwork, having to carry two seals  
6 rather than one seal?

7 MR. MILLER: I will say this: it  
8 is similar to an organic farm that has crops  
9 and livestock that they are going to certify  
10 versus one farm that just has crops and one  
11 farm that just has livestock.

12 Put the two farms together, and  
13 there is really no cost savings because it is,  
14 for me, two hours on a crop farm alone, two  
15 hours on a livestock farm alone. Put them  
16 together; it's a four-hour inspection.

17 I think that you would see similar  
18 things because, yes, it is just going to  
19 really increase the cost. I don't see any  
20 benefits to packaging it.

21 And the other thing is there's  
22 already animal welfare standards in the

1 regulation. When it is appropriate, I cite  
2 those things, and really they are all  
3 adequate, in my opinion.

4 CHAIR MIEDEMA: Any more  
5 questions?

6 (No response.)

7 Thank you.

8 MR. MILLER: Thank you.

9 CHAIR MIEDEMA: David Gard, you're  
10 up next. Greg Herbruck is standing by.

11 MR. GARD: Could you back up one  
12 slide, please? Or one more?

13 I am speaking today on two topics,  
14 calcium acid pyrophosphate, or CAPP, as a  
15 healthy leavening option and sodium acid  
16 pyrophosphate, or SAPP, for improved quality  
17 in packing of produce.

18 Next.

19 These ingredients provide  
20 opportunities to better meet the expectations  
21 of organic food consumers.

22 Next.



1           Unlike most leaveners, CAPP is  
2 based on calcium and contributes no sodium.

3           Next, please.

4           The USDA and Health and Human  
5 Services are recommending a reduction in  
6 sodium intake because -- next -- 90 percent of  
7 Americans consume too much sodium,  
8 contributing to hypertension.

9           Next.

10          Grain-based foods account for  
11 about 37 percent of the daily sodium intake  
12 for Americans.

13          Next.

14          Currently, monocalcium phosphate  
15 and SAPP are allowed for use in organic baked  
16 goods. SAPP provides a controlled leavening  
17 reaction, but is based on sodium. While MCP  
18 is calcium-based, its use and performance is  
19 quite different from that of CAPP. For most  
20 uses, CAPP cannot be substituted by  
21 monocalcium phosphate as the leavening  
22 functionality is greatly reduced.

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1                   Next.

2                   This slide shows the potential  
3 effect of replacing the leavening agent in  
4 some current organic food products. Use of  
5 CAPP could provide approximately 25 percent  
6 reduction in sodium, and calcium claims could  
7 be advertised for the products.

8                   Next.

9                   In summary, CAPP replaces calcium  
10 for sodium in controlled-release leavening,  
11 providing advantages in the baking operation  
12 and increasing the types of healthy organic  
13 baked goods available.

14                  Also, I wanted to mention the  
15 environmental information in the technical  
16 report is really not representative of the  
17 manufacture of CAPP in the United States. It  
18 is, therefore, very misleading.

19                  Next slide.

20                  The second petition relates to the  
21 use of SAPP, or sodium acid pyrophosphate, in  
22 produce. It improves produce quality and

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1 texture, process efficiency, can provide  
2 potential health benefits, and allows for more  
3 eco-friendly packaging.

4 Next slide.

5 In potatoes, SAPP inhibits  
6 browning after peeling and development of a  
7 gray color after cooking.

8 Next.

9 Currently, organic potatoes are  
10 selectively bred for less color development,  
11 but this potentially reduces the antioxidant  
12 content. Potatoes are now processed quickly  
13 in small batches, and they may be treated with  
14 citric, but it is not very effective for the  
15 gray color and leaves an off-flavor.

16 Products require non-ecological  
17 packaging to restrict exposure to the air; for  
18 example, Mylar bag.

19 CHAIR MIEDEMA: Thank you.

20 Any questions? Katrina?

21 MS. HEINZE: I have a question  
22 about leavening. Can CAPP replace SAPP in all

1 applications or only some applications?

2 MR. GARD: I would say CAPP could  
3 replace SAPP in most applications.

4 MS. HEINZE: But not all?

5 MR. GARD: I am not sure if it is  
6 good in all or not, but at least probably  
7 most.

8 CHAIR MIEDEMA: Katrina, I have a  
9 question for you. In our materials  
10 deliberations, do we use healthier products,  
11 i.e., you know, lower sodium as a yardstick in  
12 materials consideration?

13 MS. HEINZE: You know, I think  
14 that gets at that tough question about  
15 essentiality, right? So, if a consumer, if it  
16 drives a consumer need, I think that is always  
17 that debate around essentiality.

18 CHAIR MIEDEMA: Steve, did you  
19 have a question?

20 MR. DeMURI: Yes. Do you have any  
21 consumer data available that would show us  
22 that it is something that consumers really

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1 would like to see?

2 MR. GARD: In the handouts, which  
3 has additional information, we do have some  
4 results of studies from the Natural Marketing  
5 Institute. Let's see if I can refer you to  
6 it.

7 But there are results. Let's see,  
8 this would be like around slides 28, 29.

9 They do indicate that about 43  
10 percent of the general population is looking  
11 to reduce or eliminate sodium from their diet.  
12 And if you look at the category they refer to  
13 as well beings, which would probably include  
14 organic consumers, approximately 55 percent  
15 are looking to reduce or eliminate sodium.

16 CHAIR MIEDEMA: Any other  
17 questions?

18 (No response.)

19 Thank you very much.

20 MR. GARD: Thank you.

21 CHAIR MIEDEMA: Please state your  
22 name for the record.

1 MR. HERBRUCK: Good morning.

2 My name is Greg Herbruck, and my  
3 brothers and I are organic egg producers in  
4 Michigan.

5 I also submit to you letters from  
6 some of the hundreds of organic grain  
7 suppliers that sell us their grain and some of  
8 the 25 organic egg producers that are part of  
9 our system.

10 And I wanted to comment on the  
11 Livestock Committee recommendation for animal  
12 welfare.

13 My primary concern is with the  
14 outside access standard that would put the NOP  
15 in direct conflict with the FDA's egg safety  
16 rule. The NOP was required in the 1990  
17 Organic Food Production Act, Part No. 2120(f)  
18 titled "Effective Other Laws," to recognize  
19 and comply with other departmental authority.

20 The FDA issued the final rule in  
21 2009 that requires egg producers to implement  
22 measures to prevent Salmonella enteritidis

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1 from contaminating eggs on farms and from  
2 further growth in storage and transport. They  
3 did this because, quote, "SE is among the  
4 leading bacterial causes of food-borne illness  
5 in the U.S., and shell eggs are a primary  
6 source of human SE infections. The final rule  
7 will reduce SE-associated illness and deaths  
8 by reducing the risk that shell eggs are  
9 contaminated with SE." Unquote.

10 A primary component of the egg  
11 safety rule, 21 CFR 118.4, is biosecurity and  
12 requires producers to, quote, "ensure that  
13 there is no introduction or transfer of SE  
14 into or among poultry houses."

15 Among them is a requirement to,  
16 quote, "prevent stray poultry, wild birds,  
17 cats, and other animals from entering poultry  
18 houses."

19 Science has documented that  
20 rodents are a known transmission vector for SE  
21 infections in birds. The FDA began auditing  
22 poultry farms to this standard in the fall of

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1 2010 and noted non-compliances and cited  
2 numerous farms with 483 warnings.  
3 Specifically, there were citations for holes  
4 in the sides of building perimeter as small as  
5 a half-inch by two-inch.

6 Now, on to the proposal. The  
7 outside access requirement for hens' openings  
8 of 5-foot by 18-inch per 1,000 hens and  
9 directly to the soil, organic producers in  
10 this situation will be in direct conflict with  
11 an FDA rule.

12 The Committee recommendation  
13 specifies that porches would not comply, which  
14 eliminates an effective control point. A  
15 porch is currently accepted and affirmed  
16 through NOP judicial rulings in 2003.

17 So, I ask, how can a federal  
18 agency prescript a production standard that  
19 puts food safety at risk and directly  
20 conflicts with the FDA final rule?

21 Soil-based outside access may work  
22 for some regions, but the farmer needs to be

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1 the one to make the risk determination.  
2 Lethal bacteria make no distinction between  
3 organic and non-organic egg production  
4 systems.

5 Science and legal rulings have  
6 affirmed the porch as a viable outside access  
7 method while according the producer the  
8 ability to comply with an FDA biosecurity  
9 requirement. Therefore, I recommend that the  
10 recommendation from the Livestock Committee be  
11 withdrawn as proposed.

12 Thank you.

13 CHAIR MIEDEMA: Thank you.

14 Any questions?

15 (No response.)

16 I have one. Deputy Administrator  
17 Miles, may I ask you a question? If the  
18 Livestock Committee were to pass this  
19 recommendation and farmers found themselves  
20 trying to figure out which set of rules to  
21 follow, NOP and FDA, and they were at odds  
22 with one another, how would you all sort it

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1 out?

2 MR. McEVOY: Well, we are working  
3 with FDA. Currently, we are working with them  
4 in terms of the implementation of the SE rule  
5 because it will start to affect operations  
6 with more than 3,000 birds. It is currently  
7 in effect for operations that have more than  
8 50,000 birds.

9 And so, nothing in terms of our  
10 conversations with them say that outside  
11 access for birds is prohibited. What they are  
12 concerned about food safety. So, we will  
13 continue to work with them, so that the two  
14 requirements of the organic rules and the food  
15 safety rules that FDA has SE prevention can  
16 work in harmony.

17 MR. HERBRUCK: And I think I would  
18 add that we talk about the consumer  
19 expectations, and food safety is, obviously,  
20 one of the highest. There is no magic bullet  
21 to stop this. This is one of the known risk  
22 vectors, and this is a real problem that any

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1 farmer is going to have to struggle to comply.

2 CHAIR MIEDEMA: Thank you.

3 MR. HERBRUCK: Thank you.

4 CHAIR MIEDEMA: Mac, and, then, we  
5 will go to Melissa. Go ahead, Mac.

6 MR. STONE: A couple of years ago,  
7 it seems like there was a lot of conservation  
8 about avian influenza and birds being outside,  
9 and they were going to make us all put birds  
10 indoors and not allowed outside. What is your  
11 take on that or where is the conversation at  
12 this point?

13 MR. HERBRUCK: Well, the bird is  
14 not a pasture animal, but it does and is at  
15 risk to many of these things. We just had in  
16 one of our operations -- we are in Michigan;  
17 the birds don't go out all winter. It is  
18 below 50 degrees. It freezes. We have frozen  
19 ground for five months.

20 We just started letting them out  
21 in the spring, and it is migratory season in  
22 our part of the world, and we had an ILT

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1 breakout, which is laryngotracheitis.  
2 Fortunately, it was not a strong strain, but  
3 we lost several hundred birds in this strain,  
4 just because we started letting them out, not  
5 me.

6 So, this is the problem with  
7 poultry, forcing them to have this and not  
8 giving the farmer the local -- you talk about  
9 outcomes-based program. The outcome base of  
10 some of these things is a porch helps certain  
11 areas, people that have those high-risk  
12 factors, the ability to prevent some of these  
13 entrances to their farms.

14 CHAIR MIEDEMA: Melissa Bailey?

15 MS. BAILEY: Melissa Bailey, NOP.

16 Just for the Board's  
17 consideration, and we discussed this on the  
18 Livestock Committee call as well, there is  
19 kind of two, I just want to make sure the  
20 Board understands there's two issues going on  
21 here. We have the current issue that the NOP  
22 regulations have always required outdoor

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1 access for poultry. So, aside from what the  
2 Board decides on the animal welfare  
3 recommendation, the program is currently, and  
4 will continue to work with FDA on how to  
5 satisfy that requirement with the current  
6 regulations. And, then, anything that the  
7 Board decides would, of course, complement or  
8 be something that we address following that.

9 So, just to keep in mind that  
10 there are two very related, but kind of  
11 distinct issues at play here.

12 CHAIR MIEDEMA: Thank you.

13 Any more questions?

14 (No response.)

15 Thank you.

16 MR. HERBRUCK: Thank you.

17 CHAIR MIEDEMA: Kim Dietz is up  
18 next. Paul Klingerman is standing by.

19 MS. DIETZ: Good morning.

20 My name is Kim Dietz, and I would  
21 like to welcome all the new Board members and  
22 thank each and every one of you for your

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1 service to our industry.

2 For those new members, I served on  
3 the NOSB as handler representative from 2000  
4 to 2005. During that time, I acted as  
5 Materials Chair and Board Secretary.

6 I am one of the founding members  
7 of OMRI as well as the Materials Working Group  
8 and a manager for Smucker Natural Foods'  
9 regulatory compliance, 14 operations, and in  
10 my spare time I do some consulting.

11 The Sunset process. I chaired the  
12 Materials Committee through the first round of  
13 Sunset review. So, this process is very  
14 important to me.

15 While I agreed with the concept to  
16 change annotations during Sunset, it was only  
17 if alternatives are available to this  
18 industry. Some of the annotation changes  
19 recommended during this meeting are  
20 jeopardizing historical use of our materials  
21 and taking away critical farming tools.  
22 Sunset is not the time to make changes unless

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1 you are absolutely confident that there are  
2 alternatives. You must honor prior Board  
3 decisions and do your best with the ability  
4 and the information you have.

5 Crop materials. The company that  
6 I work for, Smuckers, manufactures organic  
7 pear juice. And without Bartlett pears, we  
8 would not be able to make this product.  
9 Please keep that in mind.

10 Vitamins and minerals. For the  
11 record, I disagree with the removal of the  
12 vitamin and mineral annotation. You heard  
13 public comment from a number of organizations,  
14 OTA, Richard Theuer, the National Organic  
15 Coalition and Cornucopia, all supporting the  
16 same annotation recommendation which you have  
17 in front of you. I encourage you to do the  
18 right thing and support the industry  
19 recommendation.

20 Materials. For the past several  
21 years, I have made public comment urging you  
22 to clarify the definition of "insignificant".

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1 I support the current Materials Committee  
2 recommendation and ask the Board to approve  
3 that document.

4 There was a question yesterday  
5 asking about the difference between technical  
6 and functional. When the Materials Working  
7 Group presented that, we took it directly from  
8 the CFRs. That definition includes both  
9 words, and it is also in the NOP definitions.

10 Decisive votes. There was a  
11 comment made yesterday about some of the  
12 previous NOP votes not meeting a two-thirds  
13 majority. At the time when I was on the  
14 Board, abstentions went with the majority;  
15 today that is different. So, please keep that  
16 in mind as you make those types of comments.

17 For new Board members, if you are  
18 unsure of how to vote or feel you do not have  
19 enough information, please abstain. Your  
20 decisions are critical for this industry.

21 In closing, your role as an NOSB  
22 member is to represent your segment of the



1 industry, and it is your charge to consider  
2 all current and prior information when you  
3 look at an issue. I urge you to refrain from  
4 personal opinion and uphold your duty as your  
5 industry representative.

6 There has been a lot of talk of  
7 scale, which is healthy discussion, but please  
8 remember that --

9 CHAIR MIEDEMA: Thank you.

10 MS. DIETZ: -- that might be a  
11 personal biased opinion.

12 Thank you.

13 CHAIR MIEDEMA: Any questions for  
14 Kim? Jay Feldman, and, then, Reuben Walker.

15 MS. DIETZ: That's tough in three  
16 minutes.

17 MR. FELDMAN: Yes.

18 MS. DIETZ: Sorry.

19 MR. FELDMAN: I have a lot of  
20 questions. Can I ask two questions, please?

21 CHAIR MIEDEMA: No problem.

22 (Laughter.)

1 MR. FELDMAN: Okay. I will start  
2 with my second question, then, and then, if I  
3 can have a chance to ask the other.

4 The whole issue of significance  
5 you know we have talked about.

6 MS. DIETZ: Yes.

7 MR. FELDMAN: It occurred to us,  
8 some of us, that we have a standard for  
9 allowable residues in organic food, you know,  
10 from unavoidable --

11 MS. DIETZ: Right.

12 MR. FELDMAN: -- contamination  
13 such as drift of pesticides.

14 MS. DIETZ: Five percent, up to 5  
15 percent of EPA --

16 MR. FELDMAN: Right. Now that is  
17 5 percent of what?

18 MS. DIETZ: That is 5 percent of  
19 the EPA tolerance.

20 MR. FELDMAN: Okay. So, we, as a  
21 Board, and as an institution, have basically  
22 said that we don't believe that the tolerance

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1 established by EPA is acceptable to the  
2 organic community and have taken a very small  
3 fraction of the allowable level of exposure  
4 identified by the tolerance, right?

5 MS. DIETZ: Right.

6 MR. FELDMAN: That's correct.

7 So, here we have a proposal by the  
8 Materials Committee, a majority of the  
9 Materials Committee, that says we, as a  
10 community, now will allow as insignificant --

11 MS. DIETZ: Yes.

12 MR. FELDMAN: -- the tolerance  
13 that EPA has established. How do you  
14 reconcile those two concepts?

15 MS. DIETZ: Well, my background is  
16 food. So, when the Materials Working Group  
17 worked on this, we really were referring more  
18 to the CFRs and the tolerance levels allowed  
19 for an incidental additive in food. And as  
20 you know, incidentals, they are not labeled.  
21 Sometimes you don't even know that they are in  
22 there.

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1                   And in those CFRs, there's levels.  
2                   So, you know, I agree there's that difference  
3                   of 5 percent of EPA and then what's allowed in  
4                   a food.

5                   You know, we have just begun this  
6                   discussion. I do think we need to define it  
7                   because we do have a lot of critical materials  
8                   pending.

9                   So, I know that didn't answer your  
10                  question, but, you know, we need to just come  
11                  to terms with it.

12                 MR. FELDMAN: You endorse the  
13                 Committee proposal.

14                 MS. DIETZ: I do.

15                 MR. FELDMAN: And now you are  
16                 saying we need more discussion?

17                 MS. DIETZ: I endorse the proposal  
18                 from a food perspective.

19                 MR. FELDMAN: Yes.

20                 MS. DIETZ: And again, my  
21                 background is not in EPA.

22                 MR. FELDMAN: Right, but the

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1 proposal specifically, in the majority  
2 proposal, it specifically says, if you have a  
3 choice between an OSHA standard and an EPA  
4 tolerance, in the scenario described we will  
5 take the EPA tolerance as insignificant. That  
6 is the same tolerance that we take as  
7 unacceptable as a residue on our farm.

8 CHAIR MIEDEMA: Is there a  
9 question in there?

10 MR. FELDMAN: Well, the question  
11 is, am I misinterpreting? You're agreeing  
12 with me.

13 MS. DIETZ: No, you're not. I do  
14 support the recommendation --

15 MR. FELDMAN: Right.

16 MS. DIETZ: -- oops, I knew that  
17 would happen -- to allow any tolerance by law.  
18 So, I do support that.

19 Any other questions?

20 CHAIR MIEDEMA: Do any other Board  
21 members have questions? Reuben, yes. Sorry.

22 MR. WALKER: As a new member, I

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1 appreciate seeing and hearing from past  
2 members. Is there any other suggestion you  
3 have for the new members?

4 MS. DIETZ: Oh, boy.

5 (Laughter.)

6 MR. WALKER: Because I know that  
7 we --

8 MS. DIETZ: We don't have all day.

9 (Laughter.)

10 I know, and we had a nice  
11 discussion last night. It was a pleasure  
12 speaking with you.

13 You know, just, again, I think I  
14 put it in my three minutes. You have to do  
15 the best job that you can with the information  
16 that you have. I know it is a lot of  
17 material. It is a lot of reading.

18 Look at the history of the  
19 regulations. Look at the history of this  
20 industry. All these people out here, most of  
21 us have been to every meeting since the  
22 nineties. So, use us when you can and use the

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1 information you have got.

2 Thank you.

3 CHAIR MIEDEMA: Any other Board  
4 members have questions?

5 (No response.)

6 Okay. Thank you, Kim.

7 We are at our five minutes and our  
8 number of times. Thank you.

9 I am going to go ahead and  
10 announce the person standing by, too. So,  
11 just a moment.

12 We have got Anne Mosness standing  
13 by. Go ahead.

14 MR. KLINGERMAN: Hello. I am Paul  
15 Klingerman, a Washington pork producer.

16 And I understand you have made  
17 some recommended changes last night on your  
18 pig criteria. I do think they look very good  
19 from last night. I can accept that.

20 What I had seen on the internet  
21 before wasn't an acceptable thing because it  
22 didn't even meet what the National Pork

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1 Producers and the National Pork Board was  
2 recommending, and there has been a lot of  
3 research in that.

4 But I think it is very important  
5 that the outside area be looked at from the  
6 standpoint that the animal has enough area to  
7 exhibit its natural behavior and what it likes  
8 to do. And so, I wanted to just say I do  
9 support the changes that were made last night,  
10 and I challenge the Committee to be inspired.

11 Thank you.

12 CHAIR MIEDEMA: Thank you very  
13 much.

14 Any questions for Mr. Klingerman?  
15 Reuben?

16 MR. WALKER: So, I am  
17 understanding that you support the changes  
18 that the Livestock Committee had made?

19 MR. KLINGERMAN: Last night, what  
20 someone showed me this morning.

21 MR. WALKER: So, you are  
22 satisfied?



1 MR. KLINGERMAN: Yes. I cut  
2 myself short. Thank you.

3 CHAIR MIEDEMA: Anne Mosness is at  
4 the podium, and Beth Unger is standing by.

5 MS. MOSNESS: Good morning.

6 My name is Anne Mosness. For 28  
7 seasons, I commercially fished for salmon  
8 locally on the Copper River and in Bristol  
9 Bay, Alaska. I have worked with the Institute  
10 for Agriculture and Trade Policy, Public  
11 Citizen, and other organizations on  
12 aquaculture and wild fish issues, and I a Food  
13 and Society Policy Kellogg Leadership Alliance  
14 Fellow.

15 As an ad hoc advisor to the PCC on  
16 sustainable seafoods, I have written four of  
17 their lead articles in The Sound Consumer, and  
18 I wrote this one in this latest issue, which  
19 will be given to you later on this afternoon  
20 when another PCC representative will be  
21 speaking.

22 This article is titled "Can Farmed

1 Fish Be Organic?" And it outlines only some  
2 of the problems. This is a very complex  
3 issue.

4 As B. James stated in 2008,  
5 "Organic certification of seafood should be  
6 determined on a case-by-case basis." Some  
7 species that are neither migratory nor  
8 carnivorous and are reared in closed  
9 containment systems could be considered.  
10 Salmon and other migratory carnivorous finfish  
11 should not be. Around the world, open-cage  
12 aquaculture is notoriously incapable of  
13 confining fish, pollution, parasites,  
14 pathogens, and chemicals.

15 Since Washington is one of two  
16 states that has allowed salmon farming, we  
17 have experience with the impacts. In four  
18 years, more than 613,000 non-native Atlantic  
19 salmon escaped into our waters. Several  
20 winters ago, we had an outbreak of viral  
21 hemorrhagic septicemia. Dr. Arthur Whitely  
22 has calculated that the farms right across

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1 from Seattle put more than 5 million pounds of  
2 fecal matter annually into Puget Sound.

3 With the FDA considering approval  
4 of genetically-engineered fish, and NOAA  
5 promoting open-cage aquaculture three miles to  
6 our coastline, it would be an additional  
7 bitter blow to thousands of small fishing  
8 businesses if products reared in marine  
9 feedlots were considered for organic  
10 certification which has been denied to wild  
11 seafoods. We would also find it unfathomable  
12 that wild fish could be used in feed for these  
13 organic fish.

14 Many wild fish populations are  
15 healthy and abundant. In Bristol Bay, between  
16 25 million and 65 million sockeye salmon  
17 return in a month. They are harvested by more  
18 than 2500 small boats and set-net operations.  
19 Those who harvest most species of wild fish  
20 appreciate the exuberance they exhibit as they  
21 swim freely around in our oceans and in  
22 healthy and richly-biodiverse coastal regions.

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1 Economic interests want to rear  
2 high-value species in the cheapest way  
3 possible, and they would be replicating the  
4 worst practices of factory farms on land in  
5 our marine environment. They may offer  
6 arguments about feeding the world, but  
7 independent scientists have  
8 demonstrated that --

9 CHAIR MIEDEMA: Thank you.

10 MS. MOSNESS: -- that raising  
11 those carnivorous species results in a net  
12 loss of protein.

13 CHAIR MIEDEMA: Thank you very  
14 much.

15 Any questions for Dr. Mosness?

16 MS. MOSNESS: Would you like me to  
17 pass out the statement that I have then?  
18 There's a couple more sentences.

19 CHAIR MIEDEMA: Sure.

20 MS. MOSNESS: Thank you.

21 CHAIR MIEDEMA: Beth Unger, you  
22 are up, and Didier Jacquet is standing by.

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1 MS. UNGER: Thank you.

2 I am Beth Unger from CROPP  
3 Cooperative.

4 I am not going to go into any  
5 lengthy introductions. I am going to try the  
6 three-minute drill here.

7 I want to thank the Livestock  
8 Committee for considering the public comment  
9 and editing your documents. Those are some  
10 very good improvements. It has been a long  
11 road, and we understand the need that you have  
12 to move forward and go on to other business.  
13 But we strongly suggest that you continue to  
14 listen to public comment today, as you have  
15 thus far, and take what you hear back to the  
16 Committee and come back in the fall with a  
17 blended document that will be easier for the  
18 entire community to understand and comment on.

19 And as you do so, I would strongly  
20 suggest that you take time to consider all the  
21 comments and seek stakeholder input to make a  
22 stronger document. It will be a year from now

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1 before the full impact of the pasture rule  
2 will be known to the organic community, but,  
3 you know, I can tell you that, so far, it has  
4 created a lot of pain and agony and increased  
5 paperwork and what will surely be increased  
6 inspection time. That is a burden  
7 particularly for the smaller family farms  
8 which we so dearly support. So, these are  
9 items that need to be taken into consideration  
10 as you go forward with this document.

11 I briefly want to touch on the  
12 transportation and slaughter doc. I think  
13 there has been some very good public comment  
14 on it today. We appreciate very much the  
15 rewrites that happened. It improved the  
16 document considerably, but there was a  
17 gentleman earlier that made some pretty good  
18 points regarding the effect that it could have  
19 on smaller businesses. These need to be taken  
20 into further consideration.

21 And, also, there was some public  
22 comment online that I wish I could speak to a

1 little more clearly. But I don't remember it  
2 and I have one minute left. I have got to  
3 move along here.

4 (Laughter.)

5 So, you know, talk to some of  
6 these smaller businesses that have been  
7 mentioned in the public comment. See how it  
8 affects and how you could come to something  
9 that is meaningful for the entire community  
10 and doesn't hurt the smaller businesses.

11 Nutrient vitamins and minerals.  
12 Jay, I agree with the suggestion that you put  
13 forth to the Board yesterday about coming  
14 annotation change that clarifies. And to  
15 that, I would like to speak to the Board as a  
16 whole. Please get this work done tomorrow.  
17 It is critically important.

18 I think the best course of action  
19 is to change that annotation to include 109.1  
20 and 107.100. It clarifies and aligns with the  
21 1995 NOSB recommendation that we have been  
22 talking about since the beginning of this

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1 conversation.

2 Thank you.

3 CHAIR MIEDEMA: Thank you, Beth.

4 Mac?

5 MR. STONE: Beth, what percentage  
6 of your all's producers are bumping into the  
7 30 percent, 120-day grazing rule?

8 MS. UNGER: None of them. At  
9 least that is our sincere hope. This has been  
10 a policy on our books for a pretty long time.  
11 So, this was not any news to us.

12 But I will tell you, Mac -- and,  
13 as a certifier, I am glad to have the  
14 opportunity to address that with you -- the  
15 paperwork burden that has come forth as a part  
16 of that pasture rule has been pretty difficult  
17 to deal with.

18 MR. STONE: Good. I was hoping  
19 that was where you were going with that.

20 (Laughter.)

21 CHAIR MIEDEMA: Nick?

22 MR. MARAVELL: I wanted to

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1 address, you to address, rather, some aspects  
2 of the animal welfare standards. You  
3 mentioned, and following up a little bit on  
4 what you just mentioned about the paperwork  
5 requirement from the access to pasture rule,  
6 we are sending things out. Farmers have to  
7 respond.

8 But do you see the animal welfare  
9 aspect as being somewhat comparable in terms  
10 of impact? Or do you see that perhaps the  
11 impact is different, either greater or less?

12 MS. UNGER: Both. Whatever goes  
13 into rulemaking is going to come out to the  
14 certifiers where they are going to have to  
15 adjust their application and renewal forms to  
16 include any additional rulemaking, which goes  
17 off to the farmers in terms of additional  
18 information on their organic system plans,  
19 additional recordkeeping requirements to  
20 assure compliance, and most painful of all is  
21 getting the livestock inspectors up-to-speed  
22 to deal with these issues.

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1 CHAIR MIEDEMA: I saw another  
2 hand. Jay?

3 MR. FELDMAN: Yes, thank you.

4 Thanks, Beth.

5 My question goes to comparability.  
6 The crop standards in terms of animal welfare,  
7 how do they compare with what the Livestock  
8 Committee is proposing?

9 MS. UNGER: I guess to put it in a  
10 summary form -- it was hard to go through this  
11 on a point-by-point basis -- our standards are  
12 higher than what has been presented by the  
13 Committee. And we have a method of internal  
14 inspections, and this is a new program for us.  
15 So, we definitely have a lot of work to do on  
16 it.

17 For instance, on the outdoor  
18 access for poultry, we have a five-square-foot  
19 requirement, and you have two in the document.

20 CHAIR MIEDEMA: Any other  
21 questions?

22 (No response.)

1 Thank you.

2 MS. UNGER: Thank you.

3 CHAIR MIEDEMA: Didier Jacquet,  
4 you are up next, and Dag Falck is standing by.

5 MR. JACQUET: Good morning.

6 So, my name is Didier Jacquet, and  
7 I am a winemaker and quality control  
8 professional, active since 1997 both in the  
9 United States and Europe. And my specialty is  
10 certified organic sparkling wine, which I  
11 pioneered in the U.S. with LaRocca Vineyards  
12 out of Forest Ranch, California.

13 So, quality wine is produced every  
14 day in this country and elsewhere without the  
15 use of synthetic additives such as sulfur  
16 dioxide. I felt it was important for the sake  
17 of the organic wine industry that I address  
18 this Board on that issue.

19 SO2 is an industrially-produced  
20 additive used as an antioxidant and  
21 preservative in many foods and beverages  
22 across the globe. Three main forms are

1 commonly used in wine: pure gas, liquid  
2 solution, and powder known as potassium  
3 metabisulfite, or KMBS.

4 That latter form introduces  
5 potassium, which is another source of concerns  
6 in terms of consumer health. There is no  
7 obligation for producers to disclose which  
8 form of SO2 they use in wine.

9 As a winemaker, I have used SO2  
10 before converting organic. It mandates the  
11 use of cartridge respirator, gloves, and  
12 goggles in the winery. Even with this  
13 equipment, I personally experience discomfort  
14 every time I use these additives.

15 As the winery emitted the product,  
16 we used large extraction fans, as we are  
17 instructed to end all additions one hour to  
18 the first public tour.

19 I have attached the MSDSes of  
20 commonly-used forms of SO2 to illustrate this  
21 topic. They speak for themselves.

22 From an environment, health, and

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1 safety standpoint, these products should be  
2 phased out of the wine industry altogether  
3 sooner or later. In wine, SO<sub>2</sub> has a definite  
4 smell and taste, often described as metallic  
5 and harsh, modifying the natural taste of the  
6 grape, even at relatively-low concentrations.  
7 In excess levels, the aroma is described as  
8 pungent, sharp, and soapy.

9 Heavily-sulfurated red wines often  
10 lack suppleness, delicacy, and exhibit  
11 decreases color properties due to the  
12 bleaching effect of SO<sub>2</sub>. SO<sub>2</sub> has been known  
13 to cause severe allergic reactions, which  
14 prompted legislation to impose labeling for  
15 wine, but not in other food products such as  
16 raisins, for instance.

17 Viable alternatives exist, such as  
18 better cleanliness in the cellar, filtration,  
19 and use of inert gases to protect against  
20 oxidation. Unlike SO<sub>2</sub>, these gases are not  
21 retained in the finished product.

22 There is no credible data to

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1       substantiate that wines produced without added  
2       SO2 have a shorter lifespan, if handled  
3       properly like any wine. There is significant  
4       difference in the evolution of the wine over  
5       time, however, as SO2 is an inhibitor of  
6       enzymatic reactions, which true organic wine  
7       producers believe are essential for the  
8       quality of their wines.

9                If sulfites are allowed in USDA  
10       organic wines, I wonder what will be next,  
11       genetically-modified grapes, yeast, and  
12       bacteria, industrial nutrients such as DAP or  
13       diaminophosphate. They are already being used  
14       in conventional winemaking, which should not  
15       be allowed in a truly natural food product  
16       where only the freshest and unspoiled  
17       ingredients should be included.

18               There is a great risk of  
19       confusion --

20               CHAIR MIEDEMA: Thank you.

21               MR. JACQUET: -- and discredit  
22       from --

1 CHAIR MIEDEMA: Thank you.

2 MR. JACQUET: -- the consumer  
3 labeling laws of their country to be in their  
4 best interest.

5 CHAIR MIEDEMA: Thank you, sir.

6 MR. JACQUET: Yes.

7 CHAIR MIEDEMA: Questions?

8 MR. JACQUET: Absolutely.

9 MR. FELDMAN: Indulge me. As a  
10 Frenchman, how does California wine compare to  
11 French wine?

12 (Laughter.)

13 MR. JACQUET: It would be  
14 comparing pears and oranges.

15 (Laughter.)

16 We grow grapes in very different  
17 places under very different conditions. So,  
18 there's no possible comparison. Your  
19 preference and your taste should be what leads  
20 your choice.

21 (Laughter and applause.)

22 CHAIR MIEDEMA: Thank you.

1 MR. JACQUET: Any more questions?

2 (No response.)

3 All right. Thank you very much.

4 CHAIR MIEDEMA: We will have one  
5 more comment before the break here, Dag Falck.

6 MR. FALCK: I am Dag Falck,  
7 Organic Program Manager for Nature's Path  
8 Food, North America's largest certified  
9 organic cereal producer.

10 We have submitted comments,  
11 written comments, on several of the issues on  
12 the agenda, but now I will cover only two  
13 issues that are not on the agenda, GMOs and  
14 the confusion and threat to organic by the  
15 natural label.

16 GMO. The issue of GMO  
17 contamination has developed over the last few  
18 years to a point where it could threaten the  
19 survival of organic. I am going to make two  
20 points.

21 One, the organic regulations are a  
22 practice standard. We have all agreed that

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1 organic should be ascertained through  
2 prescribed practices, not through testing or  
3 finished product purity for things like  
4 pesticide residue. However, in the case of  
5 GMOs, I argue that effective and appropriate  
6 practices cannot be implemented without the  
7 use of testing and thresholds.

8 My second point is many organic  
9 manufacturers are now aware that GMO  
10 contamination is creeping into organic  
11 products, and there are varying efforts being  
12 made to prevent this. Even though many know  
13 this, many do not and question if there really  
14 is a problem of contamination out there.

15 To establish whether or not  
16 additional measures need to be taken, we  
17 recommend that a thorough industry-wide study  
18 of current levels of GMO contamination in  
19 certified organic raw commodities like soy,  
20 corn, and cotton meal, and canola should be  
21 done.

22 Without such a study to establish

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1 a baseline and more adequately addressing  
2 potential contamination, the organic label is  
3 in danger of losing consumer confidence. This  
4 study must be undertaken by an NOSB and NOP  
5 agreed-upon body in order to provide the  
6 required credibility of a study like that.

7 As random pesticide testing is  
8 being ramped up by the NOP, this is a good  
9 time to also do GMO testing. To bury our  
10 heads in the sand on this issue will not serve  
11 us well when contamination levels get out of  
12 hand and we haven't done anything about it.

13 On the issue of natural claims  
14 infringing on organic markets, according to a  
15 Heartland Consumer study which is in my  
16 handout to you, more than half of consumers  
17 think that a natural claim means more than the  
18 organic claim. This, of course, is not true  
19 as there is no regulation or even a consistent  
20 definition for natural. The consumer then  
21 believes they are getting organic benefits  
22 through buying natural, which undermines the

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1 very industry that we are building.

2 The reason most of us are involved  
3 with building this organic industry is to  
4 provide benefit to environments, people's  
5 health and livelihoods. None of those  
6 benefits are being realized when the organic  
7 industry does not defend its turf.

8 The NOP preamble states that the  
9 final rule was implemented to provide a common  
10 set of definitions on organic attributes. Now  
11 those attributes are being undermined in the  
12 marketplace by inconsistent and unregulated  
13 natural claims.

14 Nature's Path believes that the  
15 NOSB should take responsibility for defending  
16 the organic claim by, one, asking for an NOP-  
17 led campaign for public education about  
18 organic attributes and, two, asking for  
19 enforcement on truth in labeling and require  
20 purported natural attributes to be labeled  
21 specifically.

22 CHAIR MIEDEMA: Thank you.

1 Any questions for Mr. Falck?

2 Nick has a question here in just a  
3 moment.

4 MR. MARAVELL: I have a question,  
5 but I need -- well, let me come out with it,  
6 even though I haven't thought it through and  
7 reviewed your testimony.

8 First, a conflict of interest. I  
9 do eat your products.

10 (Laughter.)

11 But are you saying that you  
12 believe that there should be a tolerance level  
13 for GMO contamination or there should not be  
14 an established tolerance level for GMO  
15 contamination in commodities?

16 MR. FALCK: I think there is a lot  
17 of confusion around that discussion. I would  
18 not call it a tolerance level. I would call  
19 it a threshold level, which I think needs to  
20 be established in order to establish an  
21 appropriate and effective practice.

22 We would have to focus on this

1 being a practice standard, but in order for us  
2 to practice, we do need to see where the  
3 contamination is. We are now practicing  
4 without knowing when something is  
5 contaminated. So, we say, the NOP says that  
6 we cannot knowingly add GMOs in our products  
7 while growing or processing, but we don't know  
8 if it is there. So, it is kind of  
9 meaningless.

10 We cannot apply the practice  
11 without the tool of testing. And if you are  
12 going to test, you need to have a threshold in  
13 order to make it meaningful, so that you have  
14 a goalpost. So, it is not an allowance.

15 CHAIR MIEDEMA: Sure, Nick.

16 MR. MARAVELL: Yes, a followup  
17 question. There are agricultural inputs and,  
18 then, there are agricultural products or raw  
19 commodities -- let's call them raw  
20 commodities -- and, then, there are products  
21 that are produced through the handling  
22 procedures.

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1           You run different places in that  
2 continuum. Are you suggesting that thresholds  
3 be established for all of those areas or just  
4 some of those areas? And would the thresholds  
5 -- well, you can't predict anything about the  
6 thresholds now. But are you suggesting that  
7 we look at all of those areas for potential  
8 threshold situations?

9           MR. FALCK: Yes, I think all the  
10 levels need to be addressed. There might be  
11 some differences in the way it is addressed.

12           Nature's Path has enrolled our  
13 products in the Non-GMO Project because we  
14 feel the NOP is not stringent enough and  
15 effective enough in addressing the GMO issue.  
16 So, we feel like we needed to have an  
17 additional step for consistency in approaching  
18 the issue, and we are hoping that the whole  
19 industry will work together.

20           CHAIR MIEDEMA: Mac?

21           MR. FALCK: And so, we are  
22 suggesting that the NOP address this and

1 incorporate more stringent rules.

2 CHAIR MIEDEMA: Mac Stone?

3 MR. STONE: What is the technology  
4 for screening and/or more definitive levels of  
5 contamination? And is the contamination  
6 coming out of the field or as part of the  
7 handling process?

8 MR. FALCK: Those are some of the  
9 questions that we think really need to be  
10 established. We don't currently know exactly  
11 where the contamination sources are coming  
12 from. Some are coming from seeds in the  
13 fields, and some are coming from handling.

14 And we feel like, without testing,  
15 again, we are not actually applying the tool  
16 that we need to apply in order to find out  
17 where the heights of the most contamination is  
18 coming, in order for us to, then, increase our  
19 efforts to keep it out.

20 So, all of those levels have to be  
21 addressed and looked at. Currently, through  
22 the NOP, we are not driven to do that. There

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1 is nothing that drives us to do that. So,  
2 that is the entirely voluntary thing right  
3 now, if companies want to do that or not. So,  
4 there is no consistency.

5 MR. STONE: And is there a litmus  
6 test that says the presence versus more  
7 analytical definitions?

8 MR. FALCK: We think that there  
9 are two systems of testing out there. One is  
10 a strip test, where it is an operator-applied,  
11 very simple test. It costs about \$3 per test.  
12 But it is not very accurate. And so, it is a  
13 good guideline, but we believe that, like the  
14 Non-GMO Project requires, is a PCR laboratory  
15 test which is much more accurate, that that is  
16 used as a part of the system.

17 CHAIR MIEDEMA: Any more  
18 questions?

19 (No response.)

20 MR. FALCK: Thank you.

21 CHAIR MIEDEMA: Okay, we are going  
22 to take a 15-minute break. That puts us back

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1 here at 9:56. Board members, please be seated  
2 at 9:56.

3 (Whereupon, the foregoing matter  
4 went off the record at 9:42 a.m. and resumed  
5 at 10:04 a.m.)

6 CHAIR MIEDEMA: We're back in  
7 session.

8 First up is Elissa Sosland.

9 MS. SOSLAND: Thank you.

10 My name is Elissa Sosland, and I  
11 am the Farm Animal Program Associate at the  
12 Animal Welfare Institute in Washington, D.C.

13 At AWI, we work on policy issues  
14 that affect the welfare of farm animals. We  
15 support high-welfare family farms, and we work  
16 toward goals to achieve more humane transport  
17 and slaughter.

18 We also operate the Animal  
19 Welfare-Approved Program that I know many of  
20 you are familiar with. Fifty-eight percent of  
21 the farms in the Animal Welfare-Approved  
22 Program are dual-enrolled in the USDA National

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1 Organic Program.

2 We have been following the  
3 progress of NOP's proposed standards for  
4 animal welfare for the past few years, and we  
5 commend your efforts to propose standards that  
6 address animal welfare under USDA organic. We  
7 believe setting standards according to good  
8 animal welfare practices under the Organic  
9 Program will bring the level of the program up  
10 to match what consumers already expect from  
11 the label when they buy organic animal  
12 products and byproducts.

13 We do have some concerns. We  
14 strongly urge the Board to improve these  
15 deficiencies in stocking rates for growing  
16 pigs and chickens, in particular, before  
17 submitting the proposal to the USDA.

18 We are really happy to see that  
19 you have increased the proposed stocking  
20 densities for growing pigs. We note, however,  
21 that the stocking rates are still well below  
22 that of Canada organic.

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1           And one thing we would really like  
2 to see is harmonization between the U.S.,  
3 Canada, and EU organic programs for the sake  
4 of consistency and clarity.

5           The current proposed standards do  
6 not satisfy the U.S. and Canada equivalency  
7 agreement under which U.S. agricultural  
8 products derived from animals must be produced  
9 according to livestock stocking rates, as set  
10 out in the Canada organic standards.

11           The current NOSB proposed space  
12 allowances for chickens and pigs do not meet  
13 the Canadian standard.

14           For poultry, we see a similar  
15 problem. Poultry expert Anne Fanatico has  
16 quoted some organic certifiers looking for  
17 stocking densities of 1.5 square feet per bird  
18 outdoors. So, the stocking rate of 1 square  
19 foot per meat chicken in the proposed  
20 standards seems to be less than what organic  
21 certifiers would look for. These would appear  
22 to be a step down for the welfare of the

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1 birds. We also contrast that with Animal  
2 Welfare-approved program requirements of 4  
3 square feet per bird outdoors, which just  
4 highlights the deficiency there.

5 Thank you for your efforts to  
6 create animal welfare standards to improve the  
7 treatment of farm animals under the Organic  
8 Program. The proposed standards are a great  
9 start, but we do see some problem areas that  
10 we think should be improved.

11 CHAIR MIEDEMA: Thank you very  
12 much.

13 Any questions?

14 (No response.)

15 All right. Next up, Phil LaRocca.  
16 Harriet Behar is standing by.

17 MR. LaROCCA: Good morning.

18 My name is Phil LaRocca. I am the  
19 owner of LaRocca Vineyards. I have been in  
20 the organic industry for over 38 years, 30 of  
21 those in the wine industry, 28 of those  
22 running my own operation. Pretty much my

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1 entire income comes off my organic wine  
2 production. I am a part-time professor at  
3 Butte Community College where I teach  
4 viticulture as well.

5 I also served as Past President of  
6 the California Organic Farmers. During that  
7 time, I worked very close with this Board to  
8 create the present rule that you have today  
9 regarding wine. I was very instrumental in  
10 getting what we have today.

11 This was not an easy thing to do  
12 because the Food and Production Act of 1990  
13 absolutely outlawed the use of sulfur dioxide  
14 in any form of organic production. So, there  
15 was a lot of backdoor politicking.

16 I may add that this rule did not  
17 affect me at the time because I have always  
18 been 100 percent organic in that. But I felt  
19 that those that were growing the grapes  
20 organically should be allowed some form of  
21 recognition. So, we worked very hard. We had  
22 to deal with Senators from the State of

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1 California and Senators from the State of  
2 Kentucky to actually get the Boxer Amendment  
3 which allowed for the made-with organic  
4 category. And that is what it was allowed  
5 for, and that is what this Board passed.

6 And for the last 10 years, it has  
7 been quite successful. There has been over  
8 133 percent increase in wine, organic wine and  
9 those made with organic grapes, since the  
10 adoption of this rule.

11 Being a hot-headed Italian, I am a  
12 little bit angered at having to do this 10  
13 years later because this is working quite  
14 well. There is no need for a change.

15 Earlier today, people were talking  
16 about the label, the label. As a licensed  
17 winemaker, I can use between 112 and 118  
18 different synthetic products in my wine. The  
19 only one that is required by law -- required  
20 by law -- is the use of sulfur dioxide in  
21 wine. This would be an absolute oxymoron to  
22 have a warning label contains sulfites next to

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1 the USDA organic seal. This would be  
2 detrimental to the entire organic community.

3 And if there is anything that you  
4 remember what I say today, it is that this  
5 label represents truth and integrity in  
6 organic. We can never compromise integrity.  
7 You would be hurting the industry to do so.

8 There have also been arguments  
9 which I passed out which say that the organic  
10 industry is not growing. Contrary to that  
11 fact, we see that in the last four years CCOF  
12 showed a 77 percent growth in wine grapes. We  
13 also saw that in the last year, in 2010, which  
14 was a bad year in the economy -- I am talking  
15 so fast here -- that Christine Bushway, the  
16 Organic Trade Association, in her State-of-  
17 the-Union Organic Address at the Annual  
18 Meeting of the CCOF said, "If organic saw a 4  
19 percent growth, that would be considered very  
20 good in this economy." Wine experienced a 12  
21 percent growth, and wine grape production  
22 experienced a 15 percent growth.

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1           Now I have been around here for a  
2 long time. I was the first certified apple  
3 grower. I was told you could never grow an  
4 organic apple. This is not true. This was  
5 told to me by the head of the Pomology  
6 Department at the University of California,  
7 Davis.

8           CHAIR MIEDEMA: Thank you, sir.

9           MR. LaROCCA: You're welcome.

10           (Laughter.)

11           I talk a lot. So, to go three  
12 minutes is hard.

13           (Laughter.)

14           CHAIR MIEDEMA: Any questions for  
15 Mr. LaRocca? Nick?

16           MR. MARAVELL: Just a point of  
17 clarification. Those increases are for  
18 California or nationwide?

19           MR. LaROCCA: Well, let's just put  
20 it this way: 93 percent of all wine  
21 production is from the State of California.  
22 So, when we are talking wine -- I know this is

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1 a new Board. So, if there's any questions of  
2 how we put this rule together, I would love to  
3 share that with you. I couldn't tell you the  
4 whole process in three minutes, but I spent  
5 over a thousand hours working with this Board  
6 to come up with this made-with category and  
7 the certified organic wine.

8 And how we did it was like a  
9 backdoor deal. We actually piggybacked it on  
10 a bill that is something to the effect that  
11 said: allow senior citizens to get a discount  
12 in generic drugs. Oh, and by the way, sulfur  
13 dioxide could be put in the made-with  
14 category.

15 (Laughter.)

16 CHAIR MIEDEMA: Any other  
17 questions for Mr. LaRocca? Melissa Bailey?

18 MS. BAILEY: Melissa Bailey, NOP.

19 I think it was Nick who asked --  
20 pardon me if I am wrong -- about the sulfite  
21 statement, the requirement from TTB. So, we  
22 have a clarification on that, just to

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1 contribute to the discussion that the  
2 requirement for the sulfite declaration is  
3 that it shall be stated on a front label, back  
4 label, strip label, or neck label. So, the  
5 fact that there is so variety there about  
6 where it can be, there is no requirement that  
7 it necessarily be on the front label.

8 MR. MARAVELL: Thank you very  
9 much.

10 MR. LaROCCA: Thank you.

11 CHAIR MIEDEMA: Harriet Behar is  
12 up next. Mohamed Mousa is standing by.

13 MS. BEHAR: Hello, everyone.

14 I have a few -- I know I have to  
15 be announced -- so I have a few comments based  
16 on what has happened yesterday.

17 I want to just ask that the animal  
18 welfare standards go back. I don't feel that  
19 they are ready to be put forward into The  
20 Federal Register for public comment or even to  
21 go to the NOP.

22 I think they need to balance

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1 practicality in that language that provides  
2 consumer confidence. I think there is also a  
3 need to be more in step with the Canadian and  
4 EU regulations because those are our sister  
5 standards.

6 And, then, on another topic, I  
7 would like to talk about yesterday's  
8 discussion, or lack of discussion, among the  
9 Board. Many of us come to these meetings to  
10 hear you discuss, and you are stakeholders  
11 representing many different aspects of the  
12 organic community. And we really need to hear  
13 a discussion.

14 Even if you agree with the  
15 proposal, we need to hear, well, the handler  
16 likes it because it helps with their inputs;  
17 the farmer likes it because it is practice, or  
18 vice versa, the consumers are concerned about  
19 health effects.

20 And yesterday's lack of discussion  
21 makes it very difficult for us here in the  
22 audience to, then, go back to our constituents

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1 and say, "Well, you know, this is why the  
2 decision was made because this priority came  
3 forward from this stakeholder group."

4 So, I just wanted to encourage  
5 you. I think the discussion is very important  
6 for you all to also build community.

7 And I know that you were  
8 discussing in committee, but that is not  
9 transparent. We don't see it out there in the  
10 audience. We cannot, then, pass that on to  
11 our constituents and get by it.

12 And I will tell you that that's  
13 something that I do a lot with my farmers.  
14 People do ask me, "Why was that material  
15 approved?" or "How come it was written this  
16 way?" That is why I come to these meetings.  
17 So, then, I can pass that on. And when I  
18 explain it was a compromise between these  
19 issues, then they have buy-in and we can move  
20 forward as a community.

21 I wanted to also talk quickly  
22 about TAP reviews. I think we need to ask the

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1 NOP to start working with a whole variety of  
2 scientists that are going to be in waiting to  
3 be, when you have handling issues, livestock  
4 issues, pest control, crop issues. We need to  
5 be starting to train these people about what  
6 compatibility with an organic system means  
7 because I think you are having a lot of  
8 problems with your TAP reviews because you  
9 don't have people who are prepared to do the  
10 work that you need to do.

11 And you don't know what is coming  
12 down the pike. So, you need to start  
13 identifying a pool of reviewers. And I think  
14 you really need to go back to the three-person  
15 TAP review.

16 I received a phone call about  
17 sodium nitrate, and I would just say that I  
18 don't believe that my opinion --

19 CHAIR MIEDEMA: Thank you,  
20 Harriet.

21 MS. BEHAR: -- was expressed. And  
22 so, don't believe that whole survey. That was

1 somewhat, from my opinion, a fraud.

2 CHAIR MIEDEMA: Thank you,  
3 Harriet.

4 I see some questions. Let's start  
5 with Katrina, then Jay, then Nick.

6 MS. HEINZE: Okay. Could you  
7 finish that last thought? Because I'm not  
8 sure we want that hanging out there.

9 (Laughter.)

10 MS. BEHAR: I was called by  
11 someone who was hired by a company that  
12 produces sodium nitrate. I didn't write it  
13 down, who it was. And, then, they said, "So,  
14 you agree with keeping sodium nitrate as  
15 written on the National List?"

16 And I said, "Well, no, actually, I  
17 do not."

18 And they said, "Well, we'll mark  
19 you down as being in line with this proposal."

20 And I said, "No, you won't."

21 And, then, they said, "Well, we  
22 really appreciate you giving us your opinion

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1 that you're going to be right there with us."

2 And I was like, "No, I'm not, and  
3 I want my name written down as saying, 'No, I  
4 don't.'"

5 And I don't know what you  
6 received, but I really doubt that my name is  
7 written down as being opposed. So, I don't  
8 know.

9 The questions were very leading,  
10 and I just don't feel like it was a very  
11 objective survey.

12 CHAIR MIEDEMA: Thank you.

13 Any? Jay?

14 MR. FELDMAN: Thank you.

15 Harriet, can you tell us some  
16 more, a little more detail, the elements of a  
17 TAP review, you know, what the various  
18 elements of a TAP review are as compared to a  
19 technical review, which we are getting now?  
20 We are all getting these technical reviews, as  
21 you know. How do you distinguish that? Give  
22 us a little more detail on the composition of

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1 TAP panels and how that would better inform  
2 our decisions at the Committee level and the  
3 Board level?

4 MS. BEHAR: Well, I know in the  
5 past we have had at least three people, and in  
6 those TAP reviews there was written debate  
7 between those, and there wasn't always  
8 agreement between the three people who were on  
9 that TAP panel. That I think helped frame the  
10 issues for the Board, to really see that these  
11 are not black-and-white issues, and the  
12 various competing ideas and science would come  
13 forward. It gave the Board much more of a  
14 broad range of what the issues really were.

15 I just feel, too, that you can't  
16 have one group of scientists being able to  
17 handle handling questions, you know, like food  
18 science versus pest control in an orchard.  
19 You need to start assembling a whole pool of  
20 possible TAP reviewers. So, when you have a  
21 pest control issue in crops, you have got  
22 these people you can pull upon who have

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1 expertise in that area.

2 CHAIR MIEDEMA: Nick?

3 MR. MARAVELL: Yes, I would like  
4 to go back to your comments on the livestock  
5 standards. Is there some other process that  
6 you might envision, other than the one that --  
7 I mean we tried our hardest here to meet  
8 expectations. But is there some other process  
9 that you might suggest that might get us  
10 closer on our first try?

11 MS. BEHAR: Well, I would have  
12 liked to have seen along in the chart the  
13 animal humane standards being compared, but,  
14 also, having EU and Canada up there as well,  
15 so we could see what our sister organic  
16 standards had.

17 I think there were so many  
18 substantial changes yesterday that we really  
19 need to go out to the larger community and  
20 find out what those effects will be.

21 So, I know that you were  
22 listening, but I feel that there's many people

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1 not here that will be affected. So, we need  
2 to kind of go out and give people more chance.  
3 This is way too big of an issue to kind of  
4 feel like we have to get it done right now.

5 MR. MARAVELL: Who is the "we"  
6 when you say, "We need to go out."? Is that  
7 just the NOSB or?

8 MS. BEHAR: The process of those  
9 recommendations will go out. It will give a  
10 chance to certifiers, people like Moses who  
11 are dealing with far more organizations, to  
12 then say, "How do you feel about these new  
13 proposals? Are these more in line with what  
14 you are willing to do or capable of doing, or  
15 how will this affect you in the long-run?"

16 So, I guess the farmer  
17 organizations, NODPA, you know, the organic  
18 dairy producers, et cetera.

19 CHAIR MIEDEMA: Tina?

20 MS. ELLOR: Just to answer a few  
21 of those concerns, we have been working on  
22 this since 2007. It has gone back and forth.

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1 We have gotten our ears pinned back so many  
2 times.

3 (Laughter.)

4 And we also heard from a lot of  
5 constituency that said, "Get something done.  
6 Get some rules that everyone needs to follow."  
7 And we do have a lot of support for this  
8 amongst a lot of farmers.

9 MS. BEHAR: I just feel like there  
10 was a lot of changes yesterday that many of us  
11 haven't had a chance to digest. We need to  
12 ruminate a little more.

13 (Laughter.)

14 CHAIR MIEDEMA: Thank you.

15 Mohamed Mousa is at the podium.  
16 Seri Sedlacek is standing by.

17 MR. MOUSA: My name is Mohamed  
18 Mousa.

19 Thank you very much for giving me  
20 this opportunity to address you.

21 I have been in this business for  
22 35 years, and I am a geneticist by education

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1 and also immune system development in poultry.  
2 I am here today to speak about science, and I  
3 really want you to give the science in your  
4 program. What a great program. My heart goes  
5 out to you and my support to you with  
6 everything you are doing.

7 I want to make sure that I open  
8 that part of science which I see personally  
9 and may be misinformed, but not enough, that  
10 it is missing from what I read about your  
11 program.

12 First, I will talk about bird  
13 welfare. We are here, everybody here, even if  
14 it is a few birds or a thousands or 10,000 or  
15 more, bird welfare is important. Mixing the  
16 birds, the domesticated birds with the wild  
17 reservoir, it is a major, major undertaking.

18 In this country, over 50 years or  
19 so now, the industry developed a system which  
20 can eradicate all diseases. If we leave the  
21 birds outside to be mixed with the wild  
22 reservoir under any reasons, we are going to

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1 impact the organic movement and, also, the  
2 non-organic.

3           The other issue, Greg Herbruck,  
4 when he talked here, talked about ILT. I have  
5 a farm currently, and today, because I leave  
6 the birds out, and geese and ducks from the  
7 wild birds are there, and I couldn't keep the  
8 birds in because the temperature was over 60  
9 degrees, we lost several thousand birds. It  
10 is a big loss.

11           The other issue is the pullets and  
12 vaccination. There are two things happening  
13 in those baby chicks when we receive them, and  
14 we take care of them just like our children  
15 and grandchildren. You vaccinate them. They  
16 are not ready to go outside and fight all  
17 these field viruses and bacteria until we get  
18 them vaccinated.

19           The other issue I want to speak  
20 about is the issue is food safety. The food  
21 safety is a major issue. We operate under a  
22 different climate in the United States. This

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1 is a continent. You know, if you have feed  
2 and water and you put it outside the birds,  
3 like what Mr. Joseph asked the question, what  
4 you do, you are going to invite rats; every  
5 other animal or bird can come down to eat with  
6 those. Then, you are contaminating the feed  
7 and contaminating the birds and, also,  
8 contaminating the eggs.

9 Dr. Peter Holt from USDA in  
10 Watkinsville, Georgia, I have got it in here  
11 in my handout. You are going to have, if the  
12 soil is contaminated for any reason, you are  
13 going to have PCPs, DDT, whatever was in the  
14 soil. Dioxin, north Germany was shut  
15 completely in the last few months because of  
16 only dioxin.

17 Thank you for listening to me.

18 CHAIR MIEDEMA: Thank you very  
19 much.

20 Any questions? Tina?

21 MS. ELLOR: So, what you are  
22 saying is that you don't think birds should be

1 allowed, you don't think chickens should be  
2 allowed to go outside?

3 MR. MOUSA: No, I said early I  
4 approve your program. The birds can go  
5 outside and poultry can go outside in a  
6 controlled environment that you know they are  
7 safe and the soil is not contaminated. I have  
8 birds outside, and I apply these rules to  
9 them.

10 CHAIR MIEDEMA: Wendy?

11 MS. ELLOR: If you are letting  
12 organic birds outside on organic soil, I am  
13 not sure what the contamination problem would  
14 be.

15 MR. MOUSA: This is very  
16 interesting. There is in Brazil a test that  
17 the soil was not even used for nine years.  
18 You have it in your packet over here. It is  
19 in the presentation from Victor Hall. They  
20 had 1,000 DDT level toxins in the eggs after  
21 nine years from stopping using it. It is in  
22 the soil because the bird is not a grazing

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1 animal. Birds go down in the soil and dig and  
2 inhale and, also, absorb a lot of what the  
3 soil contains.

4 In a town in south Egypt, a small  
5 village in south Egypt, I have this report, if  
6 anybody wants to see it. They had a gold mine  
7 from the time of the pharaohs, 4 or 5 thousand  
8 years ago. Five percent of every infant that  
9 was born in that village was blind before they  
10 get to 6 years old. They found out that this  
11 is from the chemical that was used, and it is  
12 in the soil.

13 CHAIR MIEDEMA: Wendy?

14 MS. FULWIDER: I believe that is  
15 probably the exception to the rule. But my  
16 concern would be, you know, we have a lot of  
17 organic poultry farms where they do have the  
18 chickens having outdoor access. I don't  
19 believe there has been any significant problem  
20 with Salmonella or anything else.

21 MR. MOUSA: Does anybody check?  
22 And is the soil checked?



1 I will ask the panel over here to  
2 put in all those outside ranches like what  
3 they did over in England and, also, what Dr.  
4 Ken Anderson did over in North Carolina, put  
5 the science in there. You will get more  
6 information.

7 I believe the science has no place  
8 with this panel at this time, and I can prove  
9 that to you from all the research I have. I  
10 have 150 researches from Europe and the United  
11 States.

12 I am not saying the birds don't go  
13 out. I am saying the birds go out under a  
14 controlled, clean environment. That is what  
15 I am saying.

16 CHAIR MIEDEMA: Thank you.

17 MR. MOUSA: Thank you.

18 CHAIR MIEDEMA: Next up, Seri  
19 Sedlacek. Josh Hinerfeld is standing by.

20 MS. SEDLACEK: Hi. My name is  
21 Seri Sedlacek. I work for Badger Mountain  
22 Vineyard and Powers Winery in Kennewick,

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1 Washington.

2 We are unique in the world of wine  
3 because we produce all three tiers, certified  
4 organic with the USDA certified seal, which we  
5 put no sulfites in. We make a made-with-  
6 organic-grapes in which we do add small  
7 amounts of sulfites, and we make conventional  
8 wine under the Powers label.

9 I have worked for this winery for  
10 six years. I can say from my personal  
11 experience that, when I pour all three at a  
12 table, I have given up predicting what a  
13 consumer will call quality or not. It seems  
14 to me the premise of the petition before you  
15 was based a lot on quality wine is better with  
16 sulfites added because it is a preservative,  
17 and I don't find that to be true in my  
18 experience, nor does my winery.

19 I am also an avid organic  
20 consumer, and I serve on the Board of the PCC  
21 Farmland Trust. So, I am definitely an  
22 advocate of organics of all kind.

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1           For the last nine years, our  
2 winery has embraced educating the public on  
3 what that USDA seal means and why we are proud  
4 to have that symbol on our wines. As you  
5 know, educating the consumer takes time.

6           We embrace it completely, and so  
7 do our consumers, as our no-sulfite-added  
8 series has increased 250 percent over the last  
9 nine years. We make just over 30,000 cases in  
10 that category, and it outsells/outpaces the  
11 growth of our other wines.

12           The current standards are easy to  
13 explain. They protect the consumer. They are  
14 clear and they represent pure, authentic  
15 organics with no additives.

16           Consumers who are seeking organic  
17 wines are very savvy and most definitely ask  
18 a lot of questions, as I know Mr. LaRocca  
19 would back me up as well. We get phone calls  
20 every day about what that means, and we are  
21 happy to take the time to explain it.

22           I have sold wines for nearly 20

1 years, and we are storytellers. We talk about  
2 vineyards and trellising and pH and acid, and  
3 we also tell the story of why the USDA symbol  
4 is very important to us.

5 Consumers are getting it. I  
6 encourage you to believe that the consumers  
7 are smart and savvy, and that they can make  
8 decisions based on what is on the label. When  
9 you start adding products like sulfites to  
10 wine, it gets to be very murky. It is not a  
11 black-and-white story to tell anymore. It is  
12 very confusing.

13 I just want to conclude in saying,  
14 in 1986, before it was a marketing buzz, our  
15 owner, Bill Powers, decided to transition our  
16 vineyard from conventional farming to organic  
17 farming. And he did it because he believed in  
18 the process, and now we make the three levels  
19 of wine.

20 It takes courage to be the first.  
21 We were the first certified organic wine grape  
22 vineyard in Washington, way behind Mr.

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1 LaRocca, but the Washington wine history is  
2 fledgling compared to what they are in  
3 California.

4 But the reality is I believe in  
5 authentic, pure organics, and that means no  
6 additives of any kind.

7 CHAIR MIEDEMA: Thank you.

8 Steve?

9 MR. DeMURI: So, are you finding  
10 in your conversations with consumers that  
11 there is a lot of confusion out there  
12 regarding this issue?

13 MS. SEDLACEK: That isn't my  
14 experience at all, and it is quite contrary to  
15 the survey that accompanied the petition. In  
16 the petition, I believe there were 166 people  
17 that were contacted. Sixty-three were in  
18 Minnesota, twenty-three were in Colorado, and  
19 two were on the West Coast. I don't know  
20 where most of the organics are sold in the  
21 nation, but I would speculate that perhaps on  
22 the West Coast we sell a higher percentage

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1 than .01 percent.

2 It is a story to be told, and I  
3 know a lot of wine stores that spend a lot of  
4 time explaining it, but that doesn't make it  
5 any less valuable.

6 CHAIR MIEDEMA: Go ahead, Steve.

7 MR. DeMURI: One other question I  
8 was curious about, organic wines that have the  
9 USDA seal on them, do some winemakers also put  
10 "no sulfites" on that label as well?

11 MS. SEDLACEK: We do. We actually  
12 put "No sulfites added." And ours always test  
13 out below the 10-parts-per-million level. It  
14 is a notification to our consumers, and it  
15 also makes it a difference between our made-  
16 with-organic-grapes label that we do add  
17 sulfites to.

18 CHAIR MIEDEMA: You mentioned that  
19 your no-sulfite portfolio is performing very  
20 well. Do you have no-sulfite conventional  
21 wines or know how no-sulfite conventional  
22 wines are performing out there?

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1 MS. SEDLACEK: I do not have that  
2 statistic.

3 CHAIR MIEDEMA: You don't have  
4 conventionally-grown grapes?

5 MS. SEDLACEK: Yes, I would think  
6 that if the winery is going to go to the  
7 effort of making a wine with no sulfites, that  
8 they would declare it as such.

9 I know that there are a lot of  
10 organic wine grape growers that don't bottle  
11 their wine organically, but it is seldom in  
12 the reverse.

13 CHAIR MIEDEMA: I think I was  
14 asking more conventional grapes, but no  
15 sulfites. Is that a category of wine that is  
16 grown --

17 MS. SEDLACEK: Not that I am  
18 familiar with.

19 CHAIR MIEDEMA: Okay. Okay. Yes,  
20 I was just curious.

21 Thank you.

22 MS. SEDLACEK: Thanks.

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1 CHAIR MIEDEMA: Jose Hinerfeld,  
2 and Kathy Pryor is standing by.

3 MR. HINERFELD: Good morning.

4 My name is Josh Hinerfeld, and I  
5 am the CEO of Organically Grown Company. We  
6 are a certified organic distributor  
7 headquartered in Eugene, Oregon.

8 So, decisionmaking in our company  
9 is guided by our mission, which is promoting  
10 health through organic agriculture as a  
11 leading sustainable organization. And our  
12 four core values; my comments to you this  
13 morning are informed by one of our four core  
14 values, partnerships.

15 We believe that the success of our  
16 business and the organic trade in general  
17 hinges on the cultivation of positive, long-  
18 term relationships that are built on trust.  
19 American consumers have placed trust in  
20 growers, packers, distributors, and retailers  
21 to provide them with safe, high-quality  
22 produce as well as uphold the integrity of the

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1 organic label.

2           Conversely, growers have placed  
3 trust in the government and their trade  
4 partners to provide some measure of  
5 predictability in the market for their crops.

6           I urge the Crop Committee to adopt  
7 the time-limited extension for tetracycline  
8 until January 2014 to create a predictable and  
9 economically-viable way for the domestic  
10 organic pear and apple industry to transition  
11 away from antibiotics.

12           In 2010, our company purchased  
13 approximately 2.2 million pounds of organic  
14 apple varieties that are known to be  
15 susceptible to fire blight. That was about 49  
16 percent of our organic apple purchases from  
17 Washington and Oregon.

18           OGC also purchased about 450,000  
19 pounds of organic pear varieties that are  
20 known to be susceptible to fire blight, about  
21 47 percent of our organic pear purchases from  
22 Washington and Oregon growers.

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1                   So, collectively, these purchases  
2 of susceptible varieties accounted for nearly  
3 3 percent of our total fruit and vegetable  
4 purchases.

5                   According to our apple and pear  
6 buyer, the growers of these crops uniformly  
7 stated that they would transition to  
8 conventional production if tetracycline were  
9 disallowed under the NOP in 2012.

10                   Another one of our buyers returned  
11 last week from New Zealand, where he had  
12 learned about a non-pathogenic bacterium  
13 product labeled Blossom Bless that is used by  
14 apple and pear growers as protection against  
15 fire blight infection. The use of this  
16 product down under suggested that development  
17 of commercially-viable, natural alternatives  
18 to antibiotics may be possible.

19                   Our company believes that  
20 disallowing use of tetracycline after October  
21 21st, 2012, in the absence of a commercially-  
22 viable natural alternative would be bad for

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1 the organic trade and bad for our growers.

2 OGC supports the National Organic  
3 Coalition's recommendation to allow  
4 tetracycline until January 2014, to provide  
5 growers time to get up to the learning curve  
6 on new protectant products.

7 We also support the NOC's proposal  
8 to convene an NOSB Fire Blight Task Force to  
9 monitor progress in various alternatives to  
10 antibiotics.

11 CHAIR MIEDEMA: Thank you.

12 MR. HINERFELD: Thank you.

13 CHAIR MIEDEMA: Jay Feldman?

14 MR. FELDMAN: Thank you.

15 That is interesting data. Let me  
16 make sure I understand what you are saying.  
17 Okay. So, 49 percent of the apples you are  
18 growing are of resistant or non-resistant  
19 varieties? Is that what you are saying?

20 MR. HINERFELD: Yes, let me  
21 clarify that data point, yes.

22 MR. FELDMAN: So, that would mean

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1 51 percent are from resistant varieties or no?

2 MR. HINERFELD: Yes, so what we  
3 did is we looked at the total apple purchases,  
4 organic apple purchases, from Oregon and  
5 Washington growers, and I looked at the subset  
6 of the varieties that are known to be  
7 susceptible to fire blight; namely, Fuji,  
8 Gala, Granny Smith, and Pink Lady. And those  
9 collectively accounted for 49 percent of our  
10 Oregon and Washington organic apple purchases  
11 last year. And we did a similar exercise on  
12 pears.

13 MR. FELDMAN: So, the other 51  
14 percent, presumably, are varieties such as?

15 MR. HINERFELD: Well, the list is  
16 long and I can't tell you with great assurance  
17 that they are not susceptible to fire blight,  
18 but some examples: Jonagold, Braeburn, Cameo,  
19 Cripps Pink, Opal, Red Delicious, Empire,  
20 Golden Delicious, McIntosh, Ginger Gold, Honey  
21 Crisp. The list goes on de nova.

22 MR. FELDMAN: Red Delicious,

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1 nobody is buying those, are they?

2 (Laughter.)

3 MR. HINERFELD: There are not  
4 many. We don't sell a lot of Red Delicious.

5 MR. FELDMAN: Okay.

6 MR. HINERFELD: But we have a  
7 pretty big list that were not on that short  
8 list that we knew as susceptible varieties.

9 MR. FELDMAN: Thank you.

10 CHAIR MIEDEMA: John, and, then,  
11 Tina.

12 MR. FOSTER: I just want to point  
13 out there is a difference between resistant  
14 varieties and less susceptible varieties. And  
15 that is pretty critical. I have a feeling it  
16 is going to be more critical than it has  
17 already. So, when we are using that language,  
18 it is going to be real important to be precise  
19 with that.

20 MR. HINERFELD: And I am not a  
21 scientist. So, I appreciate that, John.  
22 Thank you.

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1 CHAIR MIEDEMA: Tina?

2 MS. ELLOR: Were those apples for  
3 the fresh market or for processing?

4 MR. HINERFELD: These were for  
5 fresh. So, we primarily are a distributor to  
6 resell grocers in Oregon and Washington.

7 CHAIR MIEDEMA: Thank you.

8 MR. HINERFELD: Thank you.

9 CHAIR MIEDEMA: Okay. Kathy Pryor  
10 is up next. Roxanne Green is standing by.

11 MS. PRYOR: Hi. Thank you for the  
12 opportunity to speak with you today.

13 I represent the Washington State  
14 Chapter of Physicians for Social  
15 Responsibility. However, the information I  
16 will be presenting today was actually compiled  
17 and published by one of our partner  
18 organizations, Healthcare Without Harm.

19 I am here today to speak with you  
20 because we oppose the inclusion of any  
21 genetically-engineered foods in any phase of  
22 the production of certified organic foods.

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1 Genetically-engineered foods have not been  
2 adequately accessed for their credible adverse  
3 effects on human or animal health or on the  
4 environment in which they are a part.

5 Also of concern is the threat  
6 posed by genetic engineering to  
7 environmentally-sustainable food production  
8 and the threat to the economic livelihood of  
9 farmers pursuing sustainable production  
10 methods.

11 The health community is  
12 particularly concerned about three primary  
13 human health impacts in the consumption of  
14 genetically-engineered foods, and those are:  
15 allergies, antibiotic resistance, and  
16 toxicity.

17 The first, allergies. Genetic  
18 engineering moves proteins novel to the human  
19 diet into the food supply. For the majority  
20 of genetically-engineered crops, these novel  
21 genes have not been fully assessed for  
22 allergenicity.

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1           And editorial in The New England  
2 Journal of Medicine stated that this is  
3 because FDA requirements to not apply to foods  
4 that are rarely allergenic or to donor  
5 organisms of unknown allergenicity.

6           Secondly, antibiotic resistance,  
7 which you can imagine is of particular concern  
8 to the health community. Most genetically-  
9 engineered foods in production today carry  
10 fully-functioning genes that confer resistance  
11 to one or more antibiotics. This raises  
12 concerns that genes or other determinants of  
13 antibiotic resistance could occur from GE  
14 plants to bacteria living in the animal or  
15 human gut.

16           And third, toxicity. Genetic  
17 engineering can unpredictably increase levels  
18 of a naturally-occurring toxin in foods.  
19 Unexpected changes in food are common with  
20 genetic engineering, and the existing  
21 inadequate safety evaluations could miss  
22 potentially-toxic changes.

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1           Finally, we oppose the use of  
2 genetically-engineered foods due to the  
3 following threats to public health and the  
4 environment: increased herbicide use, threats  
5 to non-target species and soil ecology, and  
6 threats to organic farming.

7           Although industry groups claim GE  
8 crops reduce pesticide use, closer examination  
9 reveals a dramatic increase in the amount of  
10 pesticides used since the adoption of GE  
11 crops, often used to combat herbicide-  
12 resistant weeds. This increase in herbicide  
13 use adds toxic chemicals to our air, water,  
14 and soil and is known to be harmful to the  
15 health of farm workers and farm communities.

16           We are concerned about threats to  
17 non-target species because lab studies and  
18 field trials have shown that GE crops could  
19 harm butterflies and other insects as well as  
20 wildlife and soil ecology.

21           And finally, we are concerned  
22 about threats to the future of organic farming

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1 due to increased weed resistance, increased  
2 insect resistance, and we feel it is unfair to  
3 burden farmers using sustainable practices  
4 with these unpredictable factors.

5 CHAIR MIEDEMA: Thank you.

6 MS. PRYOR: If I can just wrap up,  
7 I will say that, because GE foods are not  
8 labeled in the United States, USDA  
9 certification, organic certification has been  
10 the only standard by which American consumers  
11 are able to avoid GE foods.

12 CHAIR MIEDEMA: Thank you.

13 MS. PRYOR: Please do not weaken  
14 the organic standards resistance to these --

15 CHAIR MIEDEMA: Any questions?

16 Jay?

17 MS. PRYOR: Thank you.

18 MR. FELDMAN: I have a question  
19 for you. Would it be appropriate to put  
20 resistance in a more general context or?

21 MS. PRYOR: What was that?

22 MR. FELDMAN: In a more general

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1 context about antibiotic resistance?

2 MS. PRYOR: Absolutely.

3 MR. FELDMAN: Okay. I wanted to  
4 know, from a public health perspective, if you  
5 could just talk briefly about the issues  
6 around antibiotic resistance and the various  
7 contributing factors. I mean we heard, we  
8 have gotten some data here that we are  
9 deliberating on that speaks to the issue of  
10 lateral transfer of resistant genes and the  
11 contribution that we might be making to the  
12 problem of resistance to antibiotics by  
13 utilizing antibiotics in crop reduction, in  
14 organic crop reduction.

15 Can you enlighten us any further  
16 on that?

17 MS. PRYOR: I would say, let's  
18 see, I am just going to pull from the report  
19 that was done here. They are saying that  
20 concerns have been raised. It is actually  
21 about people who would be consuming the GE  
22 foods while taking prescribed antibiotics.

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1 They are saying that it would weaken the  
2 therapeutic effect of the prescribed  
3 antibiotics.

4 Does that answer your question?

5 CHAIR MIEDEMA: Thank you.

6 MS. PRYOR: Thank you.

7 CHAIR MIEDEMA: Next up is Roxanne  
8 Green. Leslie Zuck is standing by.

9 MS. GREEN: Hello. I am Roxanne  
10 Green. I am a long-time employee at PCC  
11 Natural Markets. Those of you that know  
12 Goldie, I have been there as long as she has,  
13 a long time.

14 But I am talking today as an  
15 organics consumer because I am one of those  
16 allergy people, and we were talking about  
17 allergies a minute ago, and organics really  
18 makes a difference in my quality of life. So,  
19 I am here today just talking about organics  
20 consumers and about animal welfare.

21 So, organic food is now a  
22 mainstream item that can be found in most any

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1 supermarket in the country. It is time for us  
2 to ask ourselves what we want this word to  
3 mean. Without a solid base to stand on, the  
4 word is virtually meaningless.

5 As consumers who want to make  
6 ethical choices in our purchases, we are  
7 willing to pay premium prices. However, we  
8 have expectation that our dollars will be  
9 supporting farmers who are adhering to a  
10 higher standard than the industry average.

11 Along with the regular  
12 requirements of organic certification, organic  
13 feeds, prohibition of using hormones,  
14 antibiotics, or genetically-modified  
15 organisms, we expect that organic livestock be  
16 raised in a healthy, humane environment.

17 To produce animal products with  
18 integrity, the animals should be raised in an  
19 environment that allows them to engage in  
20 their natural behaviors, move about freely,  
21 and be subjected to stressful situations as  
22 rarely as possible.

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1                   The      current      NOSB      Livestock  
2      Committee proposal for organic pork or chicken  
3      does not even come close to the standards of  
4      industrial-scale producers and falls far below  
5      the European Union organic standards.

6                   As      informed      consumers, we are  
7      already growing increasingly suspicious of  
8      label      claims      that      do      not      meet      our  
9      expectations. Consider the recent rash of  
10     Heart   Healthy   labeling   claims   that   were  
11     required to be removed from product packaging.  
12     Humanely-raised, local, natural, free range,  
13     and cage-free don't mean what we have been led  
14     to believe they do.

15                  What   we   want   is   transparency,  
16     integrity, ethics, and honesty. Please give  
17     us some standards that we can believe in.  
18     Just don't pay lip service to organic  
19     standards. Make them mean something.

20                  We   deserve to have access to at  
21     least the same quality organics that are  
22     available in other countries, if not better.

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1 If we hope to ever have a clean, healthy food  
2 supply produced in a respectful way, it needs  
3 to start here, and it needs to start now.

4 Thank you.

5 CHAIR MIEDEMA: Any questions for  
6 Ms. Green?

7 (No response.)

8 Thank you.

9 MS. GREEN: Thank you for your  
10 time.

11 CHAIR MIEDEMA: Leslie Zuck is up  
12 next. Dave Carter is standing by.

13 MS. ZUCK: Hi. I am Leslie Zuck.  
14 It looks like I am here to make general  
15 comments. I will see if I can do that.

16 I am the Executive Director of  
17 Pennsylvania Certified Organic. I am also a  
18 certified organic farmer, which I might not be  
19 much longer if I don't get my renewal  
20 application in by the end of tomorrow.

21 (Laughter.)

22 It may surprise you to know that

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1 Pennsylvania ranks third in total organic  
2 production at the farmgate, after California  
3 and Washington State.

4 As I listened to your discussion  
5 yesterday, I was again reminded of how hard  
6 your job is. You all do your homework. You  
7 work really hard. You want to do the right  
8 thing, and you try to make the right decision.  
9 Then, someone stands up here and says you've  
10 got it all wrong.

11 I am not going to do that because  
12 I really do appreciate all of your well-  
13 presented and differing opinions and  
14 perspectives. The problem is that you have to  
15 all come together and make that decision, and  
16 that is really the hard part.

17 And I don't know if this will help  
18 in your deliberations, but I don't think it is  
19 completely necessary to re-review every  
20 material during the Sunset process with the  
21 same scrutiny that you do if the material were  
22 being petitioned for the first time. That has

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1 already been done, as you know, five or ten  
2 years ago, and even longer in some cases.

3           Organic producers have developed  
4 organic system plans that rely on certain  
5 management techniques and materials which are  
6 allowed under the current organic rules, which  
7 may not be perfect, but they are the here and  
8 now. And when those farmers learn that  
9 certain materials are subject to being re-  
10 reviewed and might disappear on a five-year  
11 interval, it kind of makes them want to run  
12 for the hills.

13           Obviously, if there is a  
14 compelling reason, based on new evidence not  
15 known at the time that the material was  
16 originally petitioned, producers will  
17 understand that, and they will probably agree  
18 with you.

19           An organic livestock producer who  
20 in a very rare situation might resort to using  
21 a prohibited antibiotic to save the life of an  
22 animal can sell that animal on the

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1 conventional market and buy a new organic  
2 animal the very next day. And this is a rare  
3 situation that that happens anyway. The  
4 farmer would not have to take their entire  
5 herd out of organic production.

6 An apple producer who, again, in a  
7 rare situation resorts to antibiotics to save  
8 the life of a block of trees doesn't have the  
9 option to replace those trees with new organic  
10 trees the very next day. If the material used  
11 turns out to be prohibited, the producer would  
12 very likely have to take the entire acreage  
13 out of organic production, not just the trees  
14 actually treated.

15 We have been able to see an  
16 increase in the production of organic tree  
17 fruit in Pennsylvania and New York with the  
18 help of Penn State and Cornell. It has become  
19 a viable means for commercial-scale, family-  
20 owned orchards to remain in agriculture at a  
21 time when conventional tree fruit production  
22 in our area has taken a big hit due to mainly

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1 to competition from the Pacific Northwest  
2 apples.

3 (Laughter.)

4 Most apples are grown for  
5 processing, and the organic applesauce and  
6 apple juice processor plants in Pennsylvania  
7 have had to source organic apples from  
8 Washington State. We would like to see the  
9 trend of organic apples in our area be able to  
10 continue, and I personally have an interest in  
11 eating them.

12 Thanks for that, and those were my  
13 comments as a farmer and a consumer.

14 CHAIR MIEDEMA: Thank you, Leslie.

15 Jay?

16 MS. ZUCK: Why did I think you  
17 were going to ask me a question?

18 (Laughter.)

19 MR. FELDMAN: So, you are telling  
20 me I don't really need to think that much  
21 about sodium nitrate. That is really good  
22 news.

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1 (Laughter.)

2 Do you use sodium nitrate?

3 MS. ZUCK: As a farmer, no, I do  
4 not.

5 MR. FELDMAN: Do you find that  
6 many in Pennsylvania are using it?

7 MS. ZUCK: Yes, we usually find it  
8 in blended fertilizers that come in a bag,  
9 small farmers, vegetable producers. It is an  
10 ingredient in that product.

11 So, it is a little complicated  
12 because we have to figure out not only what  
13 percentage it is in the product, but also what  
14 other nitrogen sources are in there. And we  
15 get a lot of help from the manufacturers to  
16 figure all that out, and we do verify that.  
17 So, there are a lot of those out there.

18 MR. FELDMAN: So, what impact  
19 would it have on Pennsylvania organic  
20 agriculture?

21 MS. ZUCK: The loss of sodium  
22 nitrate?

1 MR. FELDMAN: The loss of it.

2 MS. ZUCK: I don't know enough  
3 about it to know what they would replace it  
4 with, but I do know that it would mean that  
5 there are a lot of products on our list right  
6 now that farmers just automatically know are  
7 allowed, and they could end up making  
8 mistakes. We would have to go through and  
9 review hundreds of products and making sure  
10 that they don't have that in them at all,  
11 because a lot of times it is just a really  
12 small amount. It is not 20 percent of the  
13 nitrogen source in that bag. It is just a  
14 little boost, because I think it is expensive.  
15 So, that's why.

16 CHAIR MIEDEMA: Nick?

17 MR. MARAVELL: Leslie, what would  
18 be the impact of not having tetracycline and  
19 steptomycin for the Pennsylvania fruit  
20 growers?

21 MS. ZUCK: Well, Kyla made some  
22 comments about that yesterday. We did survey

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1 our producers to see who was using it, what  
2 they thought about it.

3 And most of them said, well, they  
4 hardly ever use it, but if they didn't know  
5 that they could when they needed to, they  
6 wouldn't really be wanting to stay in organic  
7 production because that is really scary. They  
8 have contracts they have to meet. You know,  
9 they contract with someone that they are going  
10 to sell their organic apples to. You know, it  
11 kind of has them shaking in their boots a  
12 little bit, I would think.

13 And they are small producers.  
14 They are not the pictures you saw the other  
15 day with these really giant, large farms. We  
16 wouldn't see that in Pennsylvania because it  
17 would be a big hill, for one thing.

18 (Laughter.)

19 Thank you for those questions.

20 CHAIR MIEDEMA: Thanks, Leslie.

21 Ann Schwartz -- oh, yes, here he  
22 is. Thanks, Dave. Ann Schwartz is standing

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1 by.

2 MR. CARTER: Good morning.

3 Dave Carter, National Bison  
4 Association, an NOSB refugee, itinerant  
5 consultant, here today representing the  
6 Organic Pet Food Manufacturers, working  
7 through the Pet Food Institute.

8 We came and testified a year ago  
9 to complain that nothing was being done to  
10 develop the regulations for pet food pursuant  
11 to the action that was taken by the NOSB in  
12 2008. So, having done that, I now am  
13 compelled to come here and thank the NOP for  
14 starting to work on developing the  
15 regulations.

16 The process has begun. Miles and  
17 his crew are doing work, and we are very  
18 pleased and looking forward to seeing some  
19 work, hopefully, later this year.

20 Having said that, I do want to  
21 weigh in. We do have, excuse the pun, a dog  
22 in the fight in the issue of the nutrients.

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1           What I would do, first of all, is  
2       admonish you or ask you that in this  
3       discussion that we eliminate the term  
4       "accessory" when talking about that. There  
5       are some nutrients that are accessory; there  
6       are many that are necessary, and we need to  
7       distinguish that.

8           This is particularly true in the  
9       field of pet food. The recommendation that  
10      you developed in 2008 had an appendix with 12  
11      different nutrients that would have to be  
12      petitioned for organic pet food.

13          And for us, this isn't a game of  
14      horseshoes. We don't get points for getting  
15      close. If any one of those nutrients is  
16      missing from a product, we lose the ability to  
17      label a product as a complete and balanced  
18      diet.

19          And so, you have, then, the  
20      customer that will be going in and picking up  
21      rendered stuff that is labeled as complete and  
22      balanced nutrition or an organic product that

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1 has to be labeled for intermittent and  
2 supplemental feeding only.

3 So, that is why we support the  
4 idea of, to the extent that a category of  
5 nutrients can be backed by regulatory or  
6 statutory reference, in our case, the NRC and  
7 AFCO would both suffice, that we feel that  
8 there is justification, then, to address those  
9 as a category.

10 That being said, I want to welcome  
11 the new NOSB members. This is the most  
12 enjoyable experience that you will ever endure  
13 painfully for the next five years.

14 And I know my time is running out,  
15 but I would have some advice for you, if you  
16 would care to ask a question.

17 CHAIR MIEDEMA: Jay?

18 MR. FELDMAN: I don't want any  
19 advice, but --

20 (Laughter.)

21 I do want some advice on this  
22 issue of having been, sitting around this

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1 table, a former Board member especially. We  
2 are being asked to approve a category --

3 MR. CARTER: Right.

4 MR. FELDMAN: -- say, nutrients.  
5 You are calling it nutrients. And I  
6 appreciate that. I understand that.

7 But getting down to a more  
8 specific level, how do we differentiate, what  
9 is the best way for us to effectively  
10 differentiate between a synthetic form of an  
11 individual compound or substance in that  
12 category and the synthetic form?

13 I mean, do we just assume that if  
14 a commercially-available form of that  
15 particular nutrient becomes available, then we  
16 review a petition? Or can we somehow do that  
17 at the front end in a more effective way?

18 MR. CARTER: Well, I think in the  
19 front end, you know, you will be looking at  
20 all of the nutrients that are part of that  
21 required category. In our case, it is things  
22 like lycine, taurine, you know, the like.

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1           As some things come available,  
2           yes, they could be petitioned individually.  
3           But, you know, essentially, you have got this  
4           in place right now in terms of vitamins and  
5           minerals. And particularly in livestock feed,  
6           you have the categories of vitamins and  
7           minerals that were reviewed back in 1995 and  
8           brought in as a category. This is the same  
9           approach that we would ask to be taken for the  
10          other nutrients.

11           MR. FELDMAN: And a followup. I  
12          am asking, though, was that adequate? Was  
13          bringing that category in sufficiently  
14          reviewed? Was that category sufficiently  
15          reviewed to determine whether there was a non-  
16          synthetic form of any individual nutrient or  
17          vitamin in that category? I am just not  
18          familiar with the history on that.

19           MR. CARTER: Yes, and I wasn't  
20          there in 1995, either. So, we would have to  
21          defer. But, you know, my standpoint is at  
22          least from the terms from the livestock world,

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1 and dealing with the feed that is there, I  
2 mean I think there is satisfaction that the  
3 vitamins, trace vitamins, trace minerals, as  
4 allowed by FDA, is sufficient.

5 CHAIR MIEDEMA: I have a  
6 clarification for my colleague Jay and, then,  
7 a question for the program.

8 Our Handling Committee brought  
9 forward the work of the Pet Food Task Force a  
10 couple of years ago. And we learned that  
11 taurine is only available in nature in raw  
12 heart muscle. So, it is also required in all  
13 dog and cat food to be called a complete and  
14 balanced diet. So, in other words, a  
15 synthetic is really the only way for that  
16 organic category to exist.

17 So, my question is now for the  
18 program, now that you are developing pet food  
19 regulations, it sounds like, organic pet food  
20 regulations, would essential vitamins and  
21 minerals or essential nutrients, I should say,  
22 required for pets need to be petitioned

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1 individually?

2 We have in our Handling Committee  
3 a petition for taurine right now. Will that  
4 become a moot point, based on what the NOP is  
5 working on?

6 MS. BAILEY: Sorry, Tracy, can you  
7 just repeat the question? We were conferring.

8 CHAIR MIEDEMA: Sure. Sure. No  
9 problem.

10 When the NOP develops organic pet  
11 food regulations, will you have essential  
12 nutrients for dogs and cats included? Or will  
13 they still need to be petitioned to become  
14 part of that reg?

15 MS. BAILEY: Melissa Bailey for  
16 NOP.

17 Yes, as Dave mentioned, we are  
18 currently working on the draft proposed rule  
19 for pet food standards. One of the things  
20 under consideration is a regulatory reference  
21 to include those essential nutrients and  
22 vitamins as required for pet food.

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1           So, if there's more clarification,  
2           I guess, needed on that, we can provide that,  
3           but that is what we are looking at right now.

4           CHAIR MIEDEMA: The reason I am  
5           asking it at this meeting is our Handling  
6           Committee is about to embark on the work of  
7           reviewing the taurine petition. I would just  
8           urge that work not to be pointless. If you  
9           are going to have that already being listed,  
10          let's not spin our wheels on that petition for  
11          the next six months.

12          MR. CARTER: And as the writer of  
13          that petition, I would concur. I mean, if  
14          there is an approach that will allow for a  
15          review of these as a category, I would support  
16          that.

17          MS. BAILEY: Yes, the regulatory  
18          reference, my understanding is that it only  
19          covers vitamins and minerals, and that taurine  
20          would be an amino acid that would not  
21          necessarily be covered by that regulatory  
22          reference.

1                   But I agree with you that  
2                   certainly makes sense from a process  
3                   perspective, and we can work with the Board to  
4                   provide that. So, you're not doing work that  
5                   is not really necessary.

6                   CHAIR MIEDEMA: Thank you.

7                   MR. CARTER: Yes, if we can't look  
8                   at them as a category, I mean we are looking  
9                   at a minimum of 12 separate petitions to come  
10                  before this Board. And all of them have to be  
11                  approved. Like I say, it is not horseshoes.

12                  CHAIR MIEDEMA: Thank you.

13                  Anne Schwartz is up. Sam Carruth  
14                  is standing by.

15                  MS. SCHWARTZ: Good morning.

16                  You didn't quite get my subject  
17                  matter on, but I am providing two pieces of  
18                  testimony, one for me and from another farmer  
19                  in eastern Washington. That other farmer does  
20                  refer to that.

21                  Thank you for your service. I  
22                  have been involved in the world of organic

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1 agriculture for over 30 years. I farm about  
2 100 miles from here in eastern Skagit County.  
3 I have been a certified organic farmer since  
4 1980, originally certified by Tilth Producers,  
5 and, then, the Washington State Department of  
6 Ag, starting in 1989.

7 I served on the Board of Directors  
8 for Tilth Producers for over 30 years. We  
9 represent nearly 600 organic farmers,  
10 businesses, and research faculty working to  
11 increase organic agriculture in Washington.

12 Tilth Producers strongly supports  
13 increased outdoor space requirements for  
14 poultry, hogs, and all ruminant classes of  
15 livestock. Sheep and goats should have  
16 similar scale-appropriate requirements as  
17 defined for cattle.

18 Poultry and hogs should be turned  
19 out to living, growing pasture during the  
20 growing season that provides some significant  
21 nutritional fulfillment of the animals' daily  
22 rations.

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1           The European standard provides the  
2 model and creates the opportunity for the  
3 benefits of such exposure to accrue, including  
4 self-selection of insects and plants to eat,  
5 exertion and exercise that will reduce  
6 metabolic, reproductive, and musculoskeletal  
7 diseases, and the opportunities for animals to  
8 seek space from or companionship of other  
9 animals.

10           Organic livestock systems must be  
11 based -- one minute left, really?

12           Anyway, I really agree with  
13 looking at Canadian and European standards for  
14 livestock. If growers that really disagree  
15 with the standard have a problem, then, they  
16 can label their products as fed with  
17 organically-raised feed, but raised under  
18 confinement operations.

19           Tilth Producers members are also  
20 strongly in support of continued availability  
21 to use antibiotics, namely, streptomycin and  
22 oxytetracycline, as recommended by various

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1 regional management strategies to control fire  
2 blight in apples and pears.

3 I have submitted my comments, and  
4 I will just say that, as a 30-year veteran of  
5 organic farming, the margins for farmers to  
6 stay in business are extremely tight. Many of  
7 the farmers that we are hearing from, the  
8 threat of loss of their tree fruit in an  
9 incredibly competitive arena -- the  
10 Pennsylvania growers recognize that it is hard  
11 to compete with Washington tree fruit  
12 producers. Washington tree fruit producers  
13 have a hard time competing with the scale of  
14 tree fruit production here in Washington  
15 State.

16 And I guess I am just going to  
17 urge that you all recognize that the dedicated  
18 farmers that are out there are not getting  
19 rich doing this. The costs of production make  
20 this very difficult.

21 I will take any questions.

22 CHAIR MIEDEMA: Go ahead, Katrina.

1 MS. HEINZE: We ran out of copies  
2 of Mr. McMillan's written for these two folks.

3 MS. SCHWARTZ: Okay.

4 MS. HEINZE: If you could get  
5 them?

6 MS. SCHWARTZ: I can do that. You  
7 bet.

8 MS. HEINZE: Thank you.

9 CHAIR MIEDEMA: Will you please  
10 state your position, then, on streptomycin and  
11 tetracycline?

12 MS. SCHWARTZ: We are in favor of  
13 a continuation of the Sunset clause while  
14 biological alternatives are explored and  
15 researched.

16 And another point I really wanted  
17 to make was that we believe that the NOP and  
18 NOSB should have some agreement with USDA that  
19 links the identified research priorities to  
20 the research community, so there is a flow of  
21 identified priorities that goes to the  
22 research community that really guides their

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1 selection process of research.

2 CHAIR MIEDEMA: Jay Feldman?

3 MR. FELDMAN: Anne, I don't think  
4 you mentioned in your written statement  
5 anything about sodium nitrate. Do you use  
6 sodium nitrate?

7 MS. SCHWARTZ: I have never used  
8 sodium nitrate. I think for most producers in  
9 Washington alternative protein nitrogen  
10 sources are generally available. And that is  
11 even dealing with very cold soils and lots of  
12 rain.

13 MR. FELDMAN: Thank you.

14 CHAIR MIEDEMA: Katrina?

15 MS. HEINZE: We found the two  
16 copies.

17 MS. SCHWARTZ: Oh, great.

18 Thank you for your service. We  
19 really appreciate you being here.

20 CHAIR MIEDEMA: You're welcome.

21 Sam Carruth, you are at the  
22 podium. David Lively, you are standing by.

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1 MR. CARRUTH: Good morning.

2 My name is Sam Carruth,  
3 representing SQM, the producer of natural  
4 Chilean nitrate.

5 It was mentioned yesterday that a  
6 reason to consider removing the annotation was  
7 because natural Chilean nitrate was originally  
8 put on the prohibited list 15 years ago. It  
9 is our understanding that this grew out of a  
10 concern from the certifiers over solubility of  
11 nitrates.

12 To address the concern, initially,  
13 the use was limited to 20 percent. The only  
14 way to limit the use of a natural product in  
15 the system of rules is to put it on the  
16 prohibited list and add an annotation.

17 We would like to point out that  
18 the solubility and leaching of nitrates is a  
19 concern, no matter what the source of  
20 nitrogen. All forms of nitrogen are  
21 eventually converted into nitrate.

22 The key to address this is to

1 manage nitrogen availability carefully and  
2 synchronize it as best as possible with crop  
3 needs. When it comes to impact on soil life,  
4 ample research has shown earthworm populations  
5 depend on interactions between several  
6 factors. Negative influence on earthworm  
7 populations is largely the effect of tractor  
8 traffic, soil acidity, and low soil organic  
9 matter content.

10 Natural Chilean nitrate is not  
11 acidifying and, on the contrary,  
12 transformation of organic, ureic, and ammoniac  
13 sources of nitrogen into nitrate, whether  
14 synthetic or natural, does have an acidifying  
15 effect.

16 Natural Chilean nitrate also  
17 increases yield that, in turn, leaves more  
18 crop residues on the field, increasing soil  
19 organic material, which encourages earthworms.

20 Regarding new information since  
21 the last Sunset review, the Crops Committee  
22 speaks of availability of new, alternative,

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1 rapid shots of nitrogen in the form of liquid  
2 fish or soy products. These are not  
3 equivalent alternatives as they contain little  
4 or no nitrate, consisting mostly of nitrogen  
5 as a component of proteins and amino acids.  
6 As such, they still need conversion into  
7 nitrate mineralization and are not as quick-  
8 acting.

9 In a soil that is below 60 degrees  
10 Fahrenheit, the mineralization is extremely  
11 slow and basically stops below 50 degrees  
12 Fahrenheit. Nitrogen in its organic carbon  
13 form is not available for plant uptake. This  
14 is when farmers use natural nitrate for  
15 available nitrogen in cold soils.

16 Specific to liquid hydrolyzed fish  
17 fertilizers, please note that they also often  
18 contain natural Chilean nitrate as an added  
19 ingredient in order to give a rapid shot of  
20 nitrogen and to overcome the lack of available  
21 nitrogen during cold temperatures. This is  
22 the only way that an alternative liquid fish

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1 product could be an equivalent to natural  
2 nitrate. And I hope that is clear.

3 So, liquid fish or soy-based  
4 protein nitrogen products are not affected  
5 during cool soil temperatures. If growers  
6 cannot use natural Chilean nitrate, U.S.  
7 production of organic cool season vegetables  
8 will decrease dramatically in both quantity  
9 and quality, and foreign imports from more  
10 favorable climates will inevitably take over  
11 to fill the void.

12 Once again, natural Chilean  
13 nitrate provides the farmer more control of  
14 what he is applying to the field, preventing  
15 excess application of other nitrogen sources  
16 that may have nutrient imbalances.

17 CHAIR MIEDEMA: Thank you.

18 MR. CARRUTH: Thank you.

19 CHAIR MIEDEMA: Any questions?

20 Steve?

21 MR. DeMURI: Are you the only  
22 producer of Chilean nitrate?

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1 MR. CARRUTH: No. There is  
2 another producer in Chile that produces it.

3 CHAIR MIEDEMA: Jay, and, then,  
4 Nick.

5 MR. FELDMAN: Do you have any  
6 studies that look at the need for this boost  
7 of nitrogen relative to the percentage of  
8 organic matter in the soil?

9 MR. CARRUTH: The boost of nitrate  
10 nitrogen? I am sure there are several studies  
11 out there regarding availability of nitrogen.  
12 I can certainly dig some up and have them  
13 sent.

14 MR. FELDMAN: I am wondering if  
15 there is a relationship there with higher  
16 organic matter. Would you see less, you know,  
17 the induction of the Chilean nitrate? Or are  
18 you seeing no variability there?

19 MR. CARRUTH: Not off the top of  
20 my head, I don't have a study that relates  
21 organic matter to nitrate.

22 CHAIR MIEDEMA: Nick?

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1                   MR. CARRUTH: But, again, all  
2 nitrogen is eventually converted into nitrate  
3 in time.

4                   MR. MARAVELL: Yes, I was just  
5 wondering if you have any information what  
6 would be the impact of lowering the 20 percent  
7 to, let's say, 10 percent or raising it to 30  
8 percent? I am just trying to get an idea. I  
9 don't know how the 20 percent came around.  
10 This is a product you deal with all the time.  
11 Let me know.

12                  MR. CARRUTH: The 20 percent, from  
13 our understanding, was when it was initially  
14 listed, and the concern was over the  
15 solubility of nitrates leaching. From my  
16 understanding talking to farmers, they  
17 seldomly ever get up to the 20 percent. So,  
18 decreasing down to 10 percent I still think  
19 would be a very valuable method, and in terms  
20 of getting that quick nitrate, because the  
21 majority of the product is, as mentioned  
22 earlier, blended with other sources of

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1 nitrogen, whether it be liquid or dry.

2 And going to 30 percent, it is  
3 hard to quantify the difference of 10 to 20 to  
4 30 percent, but we do feel that is a good  
5 restriction in there, allowing it just to be  
6 a supplemental tool to complement standard  
7 organic breakdown, nitrogen mineralization  
8 processes.

9 CHAIR MIEDEMA: I have a question  
10 for the National Organic Program. This 10  
11 percent allowance that the gentleman is  
12 proposing, does that help with harmonization  
13 issues or international trade and organic  
14 issues? Or is it a zero tolerance that that  
15 program was looking for?

16 MR. McEVOY: What we identified is  
17 that it is a clear difference between the U.S.  
18 organic standards and other organic standards  
19 around the world. The U.S. is the only  
20 country that allows sodium nitrate under their  
21 organic standards.

22 So, it doesn't really matter what

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1 level of allowance in terms of these trade  
2 agreements or getting your products into  
3 foreign countries. Any grower that is  
4 producing crops for export to a foreign  
5 organic standard cannot be utilizing sodium  
6 nitrate in their production. So, 10 percent  
7 wouldn't make any difference.

8 MR. CARRUTH: And again, that is a  
9 decision that should be left to the farmer.  
10 If he wants to export, then he wouldn't use  
11 it. If he wants to serve his local community,  
12 he shouldn't have that tool taken away from  
13 his arsenal.

14 CHAIR MIEDEMA: Any more  
15 questions?

16 (No response.)

17 Thank you.

18 MR. CARRUTH: Thank you.

19 CHAIR MIEDEMA: David Lively is  
20 up. Jake Lewin is standing by.

21 MR. LIVELY: Good morning.

22 My name is David Lively, and I am

1 the Vice President of Sales and Marketing of  
2 Organically Grown Company, a certified organic  
3 produce distribution company headquartered in  
4 Eugene, Oregon.

5 In my comments today, I would like  
6 to respond to the Crop Committee's proposals  
7 on two topics, ethylene and pheromones.

8 Ethylene. OGC sources organic  
9 pineapples from Costa Rica, the United States,  
10 and Mexico. Last year we handled 15,433 cases  
11 of the fruit.

12 OGC respectfully disagrees with  
13 the Crops Committee's recommendation to  
14 prohibit ethylene gas for regulation of  
15 pineapple flowering. We contacted the  
16 producers of the pineapples that we buy and  
17 found that every one of them not only uses  
18 ethylene, they consider the material essential  
19 to their operation.

20 Because pineapple flowering is  
21 commonly delayed or occurs unevenly throughout  
22 a field, growers rely on ethylene to manage

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1 the timing of the plant's flowering and,  
2 therefore, the timing of harvest. Growers  
3 report to OGC that the impact of ethylene is  
4 not only beneficial at harvest, it also  
5 facilitates efficient cultivation, management  
6 of the growing plants, and helps avoid  
7 overproduction in the peak periods.

8 OGC concurs with the information  
9 presented in the Supplementary Technical  
10 Report commissioned for this meeting.  
11 Specifically, we urge the Board to consider  
12 two points from this report.

13 One, that there has been no new  
14 alternatives to the use of ethylene gas  
15 identified since the material was first  
16 reviewed, and, two, that there are methods of  
17 applying ethylene that are both affordable and  
18 practical for use by both large and small  
19 growers.

20 OGC urges the NOSB to continue  
21 listing ethylene gas for regulation of  
22 pineapple flowering.

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1 Pheromones. The Crops Committee  
2 recommends that the NOSB continue listing of  
3 pheromones, but with an annotation that would  
4 restrict their use to, quote, "passive  
5 dispensers without added toxicants and with  
6 only approved inert ingredients".

7 OGC agrees with the Crops  
8 Committee's statement that pheromones, quote,  
9 "have become essential to organic fruit  
10 growing". We consider pheromones to be a good  
11 fit for organic fruit production because, in  
12 general, they are low in toxicity and  
13 eliminate the use of much more toxic products.

14 OGC moves many tons of tree fruit  
15 throughout the marketplace each year. When we  
16 contacted the growers of this fruit about the  
17 Committee's recommendation, they told us that  
18 the impact of prohibition of pheromones as  
19 mating disrupters would have grave impacts on  
20 their operations. One grower noted,  
21 "Pheromones are our first defense for worms.  
22 Without this tool, organic fruit growing would

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1 most likely be impossible. One fertilized  
2 female can lay down 100 or more eggs. At this  
3 time, there is no viable alternative to  
4 pheromones to organic."

5 Another grower stated, "There is  
6 no way to continue organic tree farming  
7 without pheromones. The only alternative  
8 would be to spray Spinosad two to three times  
9 and alternate with horticultural oils.  
10 Burning copious amounts of fossil fuel and  
11 alternately applying three expensive spray  
12 items eight times is worse than dumb.  
13 Pheromone ties allow growers time out from  
14 using their sprayers."

15 We agree with the Crops Committee  
16 that the issue of inert ingredients in  
17 pesticides is very important to address.  
18 However, we urge the Board to address this  
19 topic in a broader way before changing the  
20 current regulations related to the types of  
21 inert materials in pheromone products.

22 We ask the Board to relist

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1 pheromones without the portion of the proposed  
2 annotation that refers to passive dispensers.

3 CHAIR MIEDEMA: Thank you, David.

4 MR. LIVELY: Yes.

5 CHAIR MIEDEMA: Mac?

6 MR. STONE: Would you elaborate a  
7 little more on the cost associated with not  
8 applying the ethylene, whether it is trips  
9 through the field, application of other pest  
10 controls, or aspects of it, not just  
11 efficiency of harvest?

12 MR. LIVELY: I can refer to that a  
13 little, but I am certainly not an expert on  
14 it. But the materials that I have read and  
15 the growers we talked to, in both of these  
16 cases, basically, you are moving from what I  
17 would call a rifle shot to a shotgun in that  
18 it greatly increases the number of passes.

19 What I have been told in the case  
20 of ethylene, cold water, ice water is the best  
21 product, and it is a staggering quantity that  
22 would have to be applied to the field, and the

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1 number of passes is tremendous.

2 CHAIR MIEDEMA: Tina?

3 MS. ELLOR: Not being very  
4 familiar with pheromone use, in a practical  
5 sense, what other kinds of dispensers are used  
6 besides ties?

7 MR. LIVELY: Well, one I guess  
8 that would be allowed -- and a lot of this is  
9 growers' perceptions. One thing that I have  
10 learned is that the growers are getting  
11 information regarding this that is a little  
12 different than what is actually happening.

13 But, you know, basically, there is  
14 a pheromone monitoring trap which would be  
15 allowed. You know, it does not dispense  
16 throughout the orchard. But they regard those  
17 not as a control mechanism, but simply as a  
18 monitoring mechanism. And I am not sure what  
19 other means they would have.

20 CHAIR MIEDEMA: Jay?

21 MS. ELLOR: So, what would the  
22 example of a non-passive dispenser, for

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1 example?

2 MR. LIVELY: To a question like  
3 that, if you would forward that to Zea  
4 Sonnabend, when she speaks on this topic a  
5 little later, that would be great.

6 MR. FELDMAN: Yes, our intent was  
7 not to -- I'm sorry -- our intent was not to  
8 take away the mating disruption tool, which we  
9 understood to be in the form of passive  
10 dispensers. So, I am glad -- we will talk to  
11 Zea when she comes up.

12 MR. LIVELY: Yes.

13 MR. FELDMAN: Thank you.

14 CHAIR MIEDEMA: David, would you  
15 mind reading the full annotation alternate  
16 that you were proposing? I think you got  
17 through about half of it.

18 MR. LIVELY: No, I was complete.

19 CHAIR MIEDEMA: That was it?

20 Okay.

21 John? John and, then, Nick.

22 MR. FOSTER: Do you have an

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1 approximation of how many acres of pineapples  
2 feed your supply chain, and just a ball park?

3 And, then, you mentioned, you said  
4 growers. So, I am assuming more than one.

5 MR. LIVELY: Yes.

6 MR. FOSTER: About how many growers  
7 are you pulling from, give or take?

8 MR. LIVELY: Well, I would have to  
9 get you that information, which I could do  
10 easily enough. I don't know the acreage, and  
11 I don't know that anyone has ever studied the  
12 acreage.

13 And until this, you know, there  
14 are certain growers we work very directly with  
15 and then there are others we move through  
16 brokers primarily, which has been the case in  
17 a lot of what we bring in from out of the  
18 country, where there are people, companies  
19 that we work with, who are really intimately  
20 involved with those growers. And usually, we  
21 uptake information out of those guys.

22 But I know that we contacted

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1 several organizations in Costa Rica and in  
2 South America. I read Dole's testimony, but  
3 we also contacted some of the growers down  
4 there that are fairly small-scale and are  
5 doing fair trade. And they were able to just  
6 quantify literally to the number of families  
7 that were going to be impacted, the number of  
8 people in those families, employees, and stuff  
9 like that.

10 So, I can get you any of that  
11 information you would like. And in fact, one  
12 of the reasons we are here today, and one of  
13 our goals, is to establish a long-term  
14 relationship between this body, the organic  
15 distributors in the United States, of which  
16 there's about 10 -- we operate as a group  
17 called the Organic Produce Wholesalers'  
18 Coalition -- and growers, to where we can  
19 become more active in things such as when we  
20 talk about the antibiotics in apples, we have  
21 the power -- as I understand one of the issues  
22 on that case is that these growers have

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1 actually been moving into varieties that are  
2 creating a problem, Pink Lady, for instance.  
3 You know, the ones that Josh mentioned  
4 earlier, relatively new varieties on the  
5 market. They have a lot of impact and volume.

6 And we are in a position where we  
7 understand where you are going long-term to  
8 actually work with those growers. And you are  
9 walking into a boxed canyon, and you are not  
10 going to be able to get out of it. So, that  
11 is a lot of what we want to be able to do, is  
12 participate in that dialog with them and bring  
13 the monetary aspect to the market which they  
14 understand well.

15 CHAIR MIEDEMA: Nick? Then, we  
16 will wrap it up.

17 MR. MARAVELL: You mentioned that  
18 there were no known alternatives to the use of  
19 ethylene gas for controlling flowering since  
20 this was put into the rule originally. I was  
21 wondering if you could elaborate just a little  
22 bit on how you determine that, particularly

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1 for the farm producers. You know, what  
2 information do you have that shows that there  
3 is no alternatives?

4 MR. LIVELY: In our case, we  
5 relied upon the growers who we believe are on  
6 the ground and trustworthy to tell us what  
7 their capacities are and aren't.

8 MR. MARAVELL: And these were from  
9 both U.S. and foreign sources?

10 MR. LIVELY: Yes. Costa Rican  
11 primarily.

12 CHAIR MIEDEMA: Thank you.

13 MR. LIVELY: Okay.

14 CHAIR MIEDEMA: Jake Lewin is up  
15 next. Joseph Ward is standing by.

16 MR. LEWIN: Hi, everyone.

17 Thank you for this opportunity to  
18 address the Board and for all of your  
19 dedication.

20 My name is Jake Lewin. I am the  
21 Chief Certification Officer for CCOF  
22 Certification Services. CCOF is one of the

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1 oldest and largest organic certifiers in the  
2 U.S. We certify about 2400 operations of all  
3 types and perform about 3,000 inspections  
4 annually.

5 The material reviewed, discussion  
6 paper is complicated. It is important, but it  
7 is a subject I can't really address here.

8 We have submitted detailed  
9 comments that cover our thoughts and ideas for  
10 required best practices in this area, and I am  
11 now asking the Board to form an industry  
12 working group to address this over time or to  
13 work very closely with the commenters as you  
14 deliberate.

15 Meanwhile, we do believe the NOP  
16 can audit material review organizations within  
17 the accreditation process of existing  
18 certifiers.

19 All right, new subject,  
20 unannounced inspections. I am here to ask the  
21 CACC to address this item that was on their  
22 work plan previously.

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1                   Specifically, CCOF is asking the  
2                   CACC to recommend a minimum unannounced  
3                   inspection requirement for all certifiers.  
4                   NOP could, then, enforce this in the  
5                   accreditation process through rulemaking,  
6                   guidance, or some other directive mechanism to  
7                   certifiers.

8                   CCOF's unannounced inspections are  
9                   particularly valuable to the certification  
10                  process. Further, as our community grows,  
11                  this underused practice is increasingly  
12                  important.

13                  CCOF performs unannounced  
14                  inspections representing about 5 percent of  
15                  CCOF's certified operations each year. That  
16                  is about 100 inspections, about 115 a year.

17                  Other organic standards or  
18                  accreditation models have enforceable minimum  
19                  requirements for unannounced inspections.  
20                  CCOF, the Accredited Certifiers' Association,  
21                  and other certifiers also have a wealth of  
22                  tools to support broad implementation by a

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1 variety of certifiers.

2 Due to administration concerns,  
3 cost constraints, and inertia, consistent  
4 application by certifiers is unlikely with an  
5 enforceable federal-level imperative.

6 Therefore, I am respectfully asking the CACC  
7 to pick up this languishing item, address it,  
8 and establish a required minimum number of  
9 unannounced inspections annually.

10 This is really an important  
11 opportunity in front of you to improve the  
12 certification process for years to come. I  
13 would also note that an unannounced inspection  
14 requirement overlap quite well with the  
15 residue-testing requirement that we have  
16 learned about today. I think those two, they  
17 can work together pretty well.

18 So, thank you for your  
19 consideration.

20 CHAIR MIEDEMA: Thank you.

21 Steve and, then, Barry and, then,  
22 John.

1 MR. DeMURI: Isn't there already a  
2 requirement for unannounced inspections in the  
3 regulations?

4 MR. LEWIN: There is the right to  
5 perform them, but no mandate to do so.

6 MR. DeMURI: Okay.

7 CHAIR MIEDEMA: Barry?

8 MR. FLAMM: Jake, who pays for  
9 those unannounced inspections in California?

10 MR. LEWIN: Unannounced  
11 inspections, by and large, are paid for by the  
12 certifier, which ultimately means that they  
13 are paid for by the clients. Functionally,  
14 they are paid for by the clients since they  
15 are ultimately going to have to be reflected  
16 in certification fees. But, as a matter of  
17 per-inspection, 95 percent of the time they  
18 are paid for by the certifier themselves,  
19 absorbed into our cost of doing business.

20 CHAIR MIEDEMA: John and, then,  
21 Katrina.

22 MR. FOSTER: So, my question is

1 about kind of the infrastructure that a  
2 certifier needs to have in order to do this.  
3 How doable is it?

4 MR. LEWIN: It is fully  
5 achievable. The infrastructure is the same  
6 infrastructure you have in existence to  
7 perform the inspections you are already  
8 mandated to do. The additional expense of  
9 performing a minimum number of unannounced  
10 inspections is really not all that  
11 significant. Our current expense for this is  
12 about .45 percent of our expenses to do  
13 unannounced inspections at 100 a year.

14 CHAIR MIEDEMA: Katrina?

15 MS. HEINZE: Just a followup to  
16 the who pays question.

17 MR. LEWIN: Yes.

18 MS. HEINZE: I guess I have always  
19 assumed, as a handler, that we would pay  
20 because it would be, right, it is like our  
21 annual certification; it is just happening  
22 unannounced. I am a huge supporter of that.

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1 I have said this before. It is how we do both  
2 our in-house and third-party food safety  
3 audits. I have just assumed it would be  
4 billed like our annual certification. Is  
5 there a reason it can't be?

6 MR. LEWIN: With this part of the  
7 rule, there is no regulatory reason that I  
8 understand why it could not be paid for by the  
9 operation. Because we do them based on  
10 complaints and random, we do not want to  
11 impose an additional burden on clients  
12 randomly, and so, would rather absorb the cost  
13 ourselves and spread it across the entire  
14 client base as a best practice. But there are  
15 a variety of models.

16 CHAIR MIEDEMA: Katrina, you can  
17 follow up, and, then, we have Nick, Joe, Mac.  
18 Let's be brief.

19 MS. HEINZE: Is there a reason the  
20 annual, in addition to compliance, is there a  
21 reason that the annual recertification audit  
22 couldn't be done unannounced?

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1 MR. LEWIN: There is no reason  
2 that cannot happen. It is not typical since  
3 it is not always fair to expect the operation  
4 to be able to have every last person they need  
5 ready for an unannounced annual inspection.  
6 So, by and large, we use them as spot  
7 inspections and not as annuals, but they do  
8 have the capacity to serve that function. And  
9 all models are doable.

10 CHAIR MIEDEMA: Nick?

11 MR. MARAVELL: Yes, I would just  
12 like clarification on something you said about  
13 the unannounced inspections could overlap with  
14 the residue testing. Maybe I didn't hear it  
15 quite right. Could you just elaborate on what  
16 you were referring to there?

17 MR. LEWIN: My expectation would  
18 be that some percentage of our forthcoming  
19 unannounced inspections would also have a  
20 residue-testing component, and we would be  
21 serving both goals during the same visit.

22 MR. MARAVELL: So, you would be

1 collecting samples on a random, unannounced  
2 basis at that time?

3 MR. LEWIN: Yes, I would expect  
4 so. That would make sense. I don't think  
5 every unannounced inspection will involve  
6 residue testing. However, there will be  
7 overlap for a number of good reasons.

8 CHAIR MIEDEMA: Mac, did you still  
9 have a question?

10 MR. STONE: Yes. Jake, as  
11 certifiers, and I agree with unannounced  
12 inspections, but if you get there and the  
13 owner is at the market and the guys are out in  
14 the field, how do we maintain the right  
15 relationship with our members as a matter of  
16 order?

17 MR. LEWIN: I think it is very  
18 important for certified operations to  
19 understand that they have granted certifiers  
20 the right to perform inspections during normal  
21 business hours. And if nobody is there, you  
22 have other legal matters. However, we have

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1 found that we can very successfully perform  
2 any number of observations without trespass  
3 and can perform unannounced inspections every  
4 single day, regardless of if people are home.  
5 It is very easy to go look at a field to see  
6 whether or not it appears to have herbicide  
7 damage, and that can suffice as an unannounced  
8 inspection.

9 CHAIR MIEDEMA: Thank you.

10 MR. LEWIN: All right. Thank you  
11 very much.

12 CHAIR MIEDEMA: Joseph Ward is up  
13 next. Maggie Lucas is standing by.

14 We are not going to take a break.  
15 I urge members, if they want to take a break,  
16 to go ahead, so long as we maintain quorum up  
17 here. We are going to try to get caught up  
18 before lunch.

19 DR. WARD: My name is Dr. Joe  
20 Ward, and I have a Ph.D. in animal nutrition  
21 and currently serve as the President of the  
22 Iowa Organic Association.



1           I come before this distinguished  
2 Board to voice concerns to the recent  
3 recommendations that outline specific  
4 parameters for animal welfare, transport, and  
5 slaughter. On the surface, these  
6 recommendations appear to address the animal's  
7 behavioral traits as well as physical space  
8 considerations. Unfortunately, the  
9 recommendations do not adequately address the  
10 numerous factors that are associated with  
11 housing considerations, adequate floor space,  
12 biosecurity, or their exposure to disease and  
13 predators.

14           There are too many variables that  
15 influence these decisions to set in stone  
16 specific numbers as absolute requirements  
17 versus recommendations. This Committee cannot  
18 foresee and legislate all combinations and  
19 permutations for raising livestock.

20           If the intent of this Committee  
21 was to increase the awareness of the need to  
22 provide outdoor access and adequate housing,

1 and to provide guidance on these issues for  
2 all species, then we commend you for your  
3 efforts.

4 It would appear that a more  
5 realistic expectation for providing adequate  
6 floor spacing and access of the outdoors based  
7 on temperature considerations should be left  
8 to those that are directly, that are actively  
9 engaged in animal food production.

10 The Chair of the Livestock  
11 Committee provided testimony yesterday  
12 representing numbers for the space and housing  
13 considerations for livestock from the American  
14 Federation of Dairy and Animal Science that  
15 were described as requirements from this  
16 group. These space requirements are used by  
17 this group in the content as a recommendation  
18 and are not viewed as absolute minimum  
19 numbers, as described by the Chair.

20 So, when these numbers are  
21 transposed in the proposed rule by the NOSB,  
22 they move from an industry recommendation to

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1 specific numerical requirements by this Board.

2 We believe that the proposed rules  
3 must be tempered with realistic expectations  
4 and warrant further review and further  
5 discussion. We ask this Board to reconsider  
6 the proposals as a must-do versus proposed in  
7 the content as a guidance or a recommendation.  
8 Let the scientific community composed of  
9 animal behaviorists, animal nutritionists,  
10 veterinarians, and farmers work together and  
11 make the correct recommendations for the  
12 individual operation versus this Board making  
13 sweeping mandates that clearly will have far-  
14 reaching, unintended consequences that would  
15 not serve the highest good of the organic  
16 industry nor its consumers.

17 Respectfully, on behalf of the  
18 Iowa Organic Association and its members, I  
19 thank you for consideration.

20 CHAIR MIEDEMA: Thank you.

21 Wendy?

22 MS. FULWIDER: We were just

1 attempting to show you that we had looked at  
2 a lot of numbers that are put out and  
3 published by other groups. We did look at  
4 other numbers that we did not put up on the  
5 board yesterday in Committee, but we just  
6 wanted to give you an example of the numbers  
7 that we did look at.

8 And we do need to have some base  
9 for enforcement. And that is why we have put  
10 numbers forth, at the request of many that are  
11 in the audience here today.

12 CHAIR MIEDEMA: Nick?

13 MR. MARAVELL: Yes, I would just  
14 like some clarification on two things you  
15 said. Are you saying that, if our  
16 recommendations were put forward as guidance  
17 pending further back-and-forth with the  
18 community, that that would be an acceptable  
19 approach?

20 DR. WARD: Absolutely. I believe  
21 when you put the word "requirement" based on  
22 the NOP rules, they are a must-do. When you

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1 put them as a recommendation, then, when the  
2 certifying agency is on the farm, they can  
3 look at the aspects that affect that  
4 particular rule and make clear recommendations  
5 and clarify why a producer may be doing  
6 something different than the actual  
7 recommendation.

8 MR. MARAVELL: And, then, you said  
9 let farmers, veterinarians, and I think  
10 certifiers, sort of work this out. Are you  
11 referring to on a farm-by-farm basis or are  
12 you referring to looking at our standards or  
13 our proposal here? I am just trying to  
14 clarify what you are saying.

15 DR. WARD: What I am talking about  
16 is, as far as guidance and recommendations,  
17 obviously, the Board has worked very hard to  
18 come up with recommendations. But when we  
19 make them hard, fast rules across all  
20 different types of farming situations, I think  
21 we are in error.

22 We should allow those who are the

1 experts that deal with it at the farm level  
2 make those determinations on actual adequate  
3 floor space or ventilation considerations or  
4 outside access. Those considerations should  
5 be done at that level, not at this level.

6 MR. MARAVELL: And so, the  
7 certifier --

8 CHAIR MIEDEMA: Nick? Wendy, you  
9 had a followup? Okay. All right, just one  
10 more brief one will be fine. Go ahead, Nick.

11 MR. MARAVELL: I will hold.

12 CHAIR MIEDEMA: Steve?

13 MR. DeMURI: So, based on your  
14 proposal, how would you propose that the  
15 certifiers were going to enforce that?

16 DR. WARD: Enforce what?

17 MR. DeMURI: Enforce the welfare  
18 requirements. I mean without any hard, fast  
19 numbers.

20 DR. WARD: Well, we have numbers  
21 as recommendations, but when we put them in as  
22 requirements, then it is an absolute. Then,

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1 the certifying agency has to adhere to that  
2 number, and the farmer may be in violation.

3 When you place them as  
4 recommendations, then, at that point, the  
5 farmer must provide evidence why he does what  
6 he does in his organic system plan. So,  
7 therefore, there are ways to review those  
8 situations and not be a hard-and-fast rule, as  
9 it would be as a requirement.

10 CHAIR MIEDEMA: Do you still have  
11 a followup, Nick?

12 MR. MARAVELL: Yes. It is very  
13 similar to what Steve just asked. But what I  
14 am wondering is, do you have a way to get  
15 together with the other certifiers and come up  
16 with something that we could look at that  
17 would really be workable? We have to have  
18 enforcement, and we have to rely on our  
19 certifiers. So, is there something here that,  
20 a process -- I'm talking about a process, not  
21 a standard here -- is there a process here  
22 that you think all the certifiers would feel

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1 comfortable going forward with?

2 Essentially, the process you are  
3 talking about do you think that --

4 DR. WARD: I believe it is  
5 imperative that you do involve the certifying  
6 agencies and those that are on the ground  
7 because the amount of time and the  
8 implications and understanding it at the farm  
9 level is paramount.

10 So, getting them involved would  
11 sure clarify the issues, as Harriet described  
12 when she is talking with producers or talking  
13 with other organic groups. You are able to  
14 clear up why the NOSB does what it does. So,  
15 I think it would be a great idea, and I would  
16 welcome that opportunity to be involved in  
17 that.

18 CHAIR MIEDEMA: Wendy, last  
19 question.

20 MS. FULWIDER: I think especially  
21 the new Board members need to be aware that  
22 this has been up for public comment for a

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1 number of years, and the Committee has worked  
2 on this for a long time and put a lot of  
3 effort to get these numbers right. And  
4 certifiers and farmers and everyone have been  
5 involved.

6 CHAIR MIEDEMA: Thank you.

7 DR. WARD: Thank you.

8 CHAIR MIEDEMA: Maggie Lucas is up  
9 next. Are you here, Maggie?

10 (No response.)

11 Okay, Dragan Macura is up next.  
12 Tony Dryak is standing by.

13 MR. MACURA: My name is Dragan  
14 Macura. I am the founder and part owner of  
15 AgroThrive, Incorporated. We use corn steep  
16 liquor as part of our process of making liquid  
17 organic fertilizers. This is my third time  
18 presenting on the topical of corn steep  
19 liquor.

20 I support the recommendation by a  
21 majority of the Crops Committee to continue  
22 listing steep liquor as the non-synthetic and

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1 allowed in the use of organic fertilizers.

2 Today I would like to present some  
3 of the scientific information that seems to be  
4 either misunderstood or not interpreted  
5 correctly by some of the opposition who is  
6 advocating the listing of steep liquor as  
7 synthetic.

8 Basically, they are using the  
9 information that is obtained on the basis of  
10 laboratory circumstances, which are totally  
11 different than the industry conditions for  
12 production of corn steep liquor by the  
13 countercurrent corn steeping process.

14 I have presented these before. I  
15 again summarize them in this table.

16 To be sure, I have never advocated  
17 or tried to present that sulfur dioxide does  
18 not break disulfide bonds. Sulfur dioxide, to  
19 be clear, does break disulfide bonds under  
20 certain laboratory conditions, and these  
21 conditions are summarized in the table, in the  
22 left side of this table.

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1           In particular, the corn kernel pH  
2           has to be high, relatively high. The  
3           introduction of high concentration of sulfur  
4           dioxide has to be continued throughout the  
5           process.

6           If you can take a look at the Biss  
7           and Cugin, the best available science, they  
8           have used a high concentration of sulfur  
9           dioxide 11 times during the time that the  
10          process takes place in 50 hours. And, also,  
11          SO<sub>2</sub> must be in its active form. These  
12          conditions absolutely do not exist in the  
13          steeping process in industry, and the  
14          conditions for that are summarized here.

15          Could you have the next slide,  
16          please? Actually, the last slide.

17          This is the process that actually  
18          happens in the industry. And the last slide,  
19          additional information, this is a publication  
20          by Hull, et al., in 1996. That separated  
21          individual components that are important in  
22          determining this sterile water they found

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1 releases as much carbohydrate and protein as  
2 the industrial process. When they add lactic  
3 acid, it has no effect. When they add sulfur  
4 dioxide, it actually levels or decreases the  
5 release of proteins or carbohydrates, proving  
6 that sulfur dioxide does not release proteins  
7 --

8 CHAIR MIEDEMA: Thank you.

9 MR. MACURA: -- or carbohydrates,  
10 as claimed by the opposition.

11 CHAIR MIEDEMA: Thank you.

12 MR. MACURA: Thank you. I would  
13 entertain any questions.

14 CHAIR MIEDEMA: Tina?

15 MS. ELLOR: If sulfur dioxide is  
16 not releasing proteins in varieties, why is it  
17 used then?

18 MR. MACURA: From looking at the  
19 process, it is used to stop the fermentation  
20 -- the process is a biological process; there  
21 is no doubt about that. The fresh corn is  
22 added to steep liquor when it has very high

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1 lactic acid fermentation going on. It is very  
2 well known that lactic acid bacteria are  
3 proteolytic and they hydrolyze pretty well  
4 everything, carbohydrates, starches, and  
5 proteins alike.

6 It is used to help select for  
7 lactic acid bacteria that, then, produce  
8 lactic acid, stabilize the process, and  
9 continue the release of starches during the  
10 initial phase of the process.

11 It is used at the very end, and  
12 you will see in the description of the process  
13 it is used at the very end, only an hour and  
14 a half before the 50-hour process is complete,  
15 to stop the fermentation, so that the  
16 hydrolysis or digestion of the components does  
17 not continue and carry over into the other  
18 components of the process.

19 CHAIR MIEDEMA: Tina?

20 MS. ELLOR: So, just to follow up,  
21 and very briefly, if you could, because this  
22 is such a complicated issue, could you sum up

1 what the essential -- we have two experts here  
2 telling us two different things. Sum up very  
3 simply and clearly and briefly, if you would,  
4 where those differences occur.

5 MR. MACURA: First of all, the  
6 experts, and I don't want to be disrespectful,  
7 but one of the thing, as an expert, as a  
8 science expert, the first thing you need to do  
9 as a scientist is to look at the experimental  
10 design of the research in question.

11 With all due respect, Dr. Johnston  
12 did not read or he misinterpreted the  
13 experimental design of the Biss and Cugin, the  
14 most relevant research in this respect. He  
15 missed, totally missed, the clear explanation  
16 in the materials and methods that very high  
17 concentrations of sulfur dioxide were used  
18 right throughout the process every five hours  
19 in the laboratory conditions that were set by  
20 Biss and Cugin. That is not what happens in  
21 the industry. Biss and Cugin explained that  
22 very clearly, and they showed ample evidence

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1 that that is not what happens. He chose to in  
2 the largest part ignore that.

3 And, also, we have seen testimony  
4 yesterday, or at least the presentation by our  
5 respected member of the NOSB here, that  
6 emphasized some of the things that were just  
7 not expressed in the research. Some of the  
8 comments were made in the introductions and in  
9 the textbooks, but that is not -- as a  
10 scientist, you go to the experiments. You  
11 evaluate whether the experiments were done  
12 correctly. Then, you look at the conclusions  
13 that were made and evaluate them on the basis  
14 of how the experiments were set up. That  
15 wasn't done in the expert opinion, and it is  
16 clear from their --

17 CHAIR MIEDEMA: Any other  
18 questions? John?

19 MR. FOSTER: I was wondering if you  
20 had had a chance to read what Richard Theuer  
21 had provided on this --

22 MR. MACURA: Yes.

1 MR. FOSTER: -- and whether that  
2 informed your opinion any more or less --

3 MR. MACURA: Yes.

4 MR. FOSTER: -- relative, inasmuch  
5 as it might clarify or draw attention to what  
6 you have already said?

7 MR. MACURA: Yes, I did. There  
8 was a question of, if sulfur dioxide was  
9 involved in the breakdown, in the breaking of  
10 disulfide bonds, as we all agreed that it does  
11 under certain conditions, there would have  
12 been an increased sulfur content in the final  
13 product in steep liquor.

14 Richard Theuer did a very  
15 meticulous calculation of whether there is  
16 extra sulfur found in the countercurrent  
17 steeping, resulting steep liquor. He  
18 concluded that there was none.

19 What else? I think that was the  
20 most important.

21 CHAIR MIEDEMA: Thank you.

22 Last question, Jay.



1 MR. FELDMAN: So, not only -- I  
2 just want to make sure I understand this --  
3 Dr. Johnston's misinterpreting the literature,  
4 and the basic textbook Corn Chemistry and  
5 Technology, 2nd Edition, is not telling us the  
6 right thing, is that correct?

7 MR. MACURA: I am not going to  
8 comment to that. I haven't read it. But the  
9 textbooks usually use general statements. I  
10 did not see any discussion of any research  
11 that leads to that, nor did I see any research  
12 published by Dr. Johnston in the area of  
13 sulfur dioxide use.

14 MR. FELDMAN: Well, he has a  
15 paper --

16 MR. MACURA: He has mentioned in  
17 his introductions to all of his papers. His  
18 expertise lies in enzyme use in the steeping  
19 process; it is not in sulfur dioxide use.

20 He also has not published anything  
21 peer-reviewed on the disassociation chemistry  
22 of sulfurous acid. That is where the crux of

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1 the problem is. There is no chemical  
2 environment in the countercurrent process to  
3 allow for disulfide bond breakage by sulfur  
4 dioxide.

5 MR. FELDMAN: Well, you just said  
6 earlier that sulfur dioxide breaks disulfide  
7 bonds.

8 MR. MACURA: Under the conditions  
9 --

10 MR. FELDMAN: Now you are saying  
11 it doesn't.

12 MR. MACURA: No, under the  
13 conditions, laboratory conditions, clearly  
14 outlined by Biss and Cogin, which are not  
15 present in the countercurrent process.

16 MR. FELDMAN: Madam Chair, I am  
17 beginning to think this is the organic  
18 community's evolution debate.

19 CHAIR MIEDEMA: Excuse me. Please  
20 wait to be recognized.

21 MR. FELDMAN: We have got  
22 textbooks that are --

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1 CHAIR MIEDEMA: Jay?

2 MR. FELDMAN: -- respected in the  
3 field which are being --

4 CHAIR MIEDEMA: Okay, let's wait  
5 to be recognized, please. Thank you.

6 I have one final question. It is  
7 actually for our Materials Chair. When we  
8 look at the production of the material, and it  
9 can be produced in a lab one way and it can be  
10 produced at scale for production another way,  
11 are we usually privy to those two different  
12 production methods? And which do we use in  
13 evaluating the material?

14 MS. HEINZE: Well, we need to  
15 review the one that is going into being used  
16 as an input. And, you know, if you go back to  
17 that November of 2009 recommendation, one of  
18 the things we said was we needed to do this  
19 deep dive. So, I think this deep dive is very  
20 important and we need to understand the  
21 process that is being used as an input.

22 And, then, the other thing we said

1 was we needed to use annotations to clarify  
2 that.

3 CHAIR MIEDEMA: Thank you.

4 MR. FELDMAN: Madam Chair, can we  
5 ask OMRI which they have done to evaluate?  
6 Because I have been told that OMRI used our  
7 policy to evaluate the countercurrent  
8 commercial process.

9 And so, you are asking a question  
10 that implies that we are relying on a  
11 scientific study, and we are not.

12 CHAIR MIEDEMA: I asked a  
13 different question, and Katrina has answered  
14 it.

15 Thank you.

16 MR. MACURA: Thank you.

17 CHAIR MIEDEMA: Tony Dryak is up  
18 next. Richard Mathews is standing by.

19 MR. DRYAK: I come here for the  
20 third time to talk about particularly organic  
21 laying hens.

22 My background is I have been

1 farmer for 37 years. I have experience with  
2 all species of livestock. I think, as a  
3 result, I have become pretty qualified to  
4 discuss through observation.

5 I am going to speak from two  
6 perspectives in the three minutes allotted.  
7 I am going to speak from an outsider point of  
8 view. That is, as a farmer that has gone  
9 outside our country to promote U.S.  
10 agriculture output, Asia as well as Europe.

11 When you are in those emergents,  
12 you find out how wholly inadequate the  
13 standard has been up to this point in time.  
14 The standard that is being suggested right now  
15 is a massive improvement, but it is still a  
16 work-in-progress, but it does give us some  
17 guidance.

18 Today, given the USDA standard, I  
19 cannot export an egg in any form to another  
20 country because we simply don't meet the  
21 requirements. The EU has thousands of years,  
22 the area has thousand of years of experience

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1 with laying hens, and they have evolved a  
2 system that works very well. So, it behooves  
3 us, and we can see that the standards that the  
4 Livestock Committee has relied upon really  
5 follows models that have come mainly from the  
6 European continent. The humane farm animal  
7 care standards are modeled after the European  
8 and American farm, the same.

9 My other perspective is I look at  
10 the situation from the perspective of a  
11 chicken and how the consumer perceives what is  
12 being produced for the U.S. market. I would  
13 venture to guess that most organic eggs are  
14 produced in the system you see on the right  
15 and not on the system you see on the left.

16 You can go to the next slide.

17 This would be an example of a free  
18 range.

19 Go to the next slide.

20 This is another example of free-  
21 range organic.

22 Go to the next slide.

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1                   This is another example of cage-  
2 free organic production with no outdoor  
3 access.

4                   Go to the next slide.

5                   This is another example of organic  
6 within the system.

7                   And so, as a consumer, the  
8 consumer perceives they are receiving products  
9 from the example on the left side, which is an  
10 example from Europe where the hens range  
11 freely and they are able to exhibit all the  
12 natural behaviors, including foraging. A  
13 chicken is an omnivore, which means he eats  
14 both plant and animal material.

15                   CHAIR MIEDEMA: Thank you.

16                   Mac, Katrina, and John.

17                   MR. STONE: If your certifier  
18 documents that you would meet EU standards,  
19 can you still, would you be able to export?

20                   MR. DRYAK: Yes, but you first  
21 have to set up a system that meets the  
22 standard. One example is that the EU requires

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1 that you feed grass/plant material to a  
2 chicken through the wintertime. And on our  
3 farm, we have done that and successfully.

4 CHAIR MIEDEMA: Katrina?

5 MS. HEINZE: If I have learned  
6 anything from materials classification, it is  
7 that a rush to do a rule gets you in trouble  
8 really fast.

9 (Laughter.)

10 So, it is a little bit of  
11 declaration of where I stand, since we got a  
12 reminder to do that.

13 But my question for you is, if we  
14 implemented the more prescriptive, the things  
15 that are under debate as guidance, so  
16 certifiers had a line that they were trying to  
17 certify to, but, then, had certifier  
18 discretion to interpret when things weren't  
19 that way, do you feel that is a good first  
20 step, as we grapple with this and try to get  
21 to where you want us to be?

22 MR. DRYAK: Well, could you



1 describe the second condition? Could you  
2 describe your second condition a little  
3 better, please?

4 MS. HEINZE: Okay. So --

5 MR. DRYAK: If you are using the  
6 proposal as a minimum, I am talking about the  
7 discretionary part on the part of the  
8 certifier.

9 MS. HEINZE: I guess my concern is  
10 that I don't fully understand the unintended  
11 consequences if we put this in the rule. So,  
12 if we made it guidance and said this is what  
13 we think is right, certifiers would go audit  
14 to that, and chances are sometimes they would  
15 find things that didn't comply with that.

16 If it is in the rule, they have no  
17 discretion. If it is in guidance, they, then,  
18 dig deeper. They may have to have  
19 conversations, you know, with the NOP,  
20 whoever, for those differences. Some are  
21 going to be clearly not okay, and some might  
22 be okay. You know, another way to get to the

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1 performance standard we are trying to get to.

2 So, that is the discretion.

3 I am starting to think that seems  
4 like a first good first step. I am trying to  
5 figure out if you think that is a good first  
6 step.

7 MR. DRYAK: Okay. As a farmer, I  
8 have been certified by four U.S. certifiers in  
9 the almost 20 years of being a farmer. I have  
10 never found one inspector to interpret, nor  
11 the inspection agency to interpret, the rule  
12 closely and similarly enough.

13 I have been a farmer that has  
14 gotten in trouble three times, I haven't been  
15 decertified, but even though I engage in due  
16 diligence about fertilizer, about chickens,  
17 whether or not they should have a beak trimmed  
18 or a beak left on the bird.

19 And with the bird question, I beak  
20 trimmed mildly. That certifier at that time  
21 said they would not certify my hens.

22 So, I think allowing discretion is

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1 a real slippery slope, and you are not going  
2 to see the kind of change that really needs to  
3 happen out here.

4 CHAIR MIEDEMA: Tina Ellor?

5 MS. ELLOR: With the Chair's  
6 permission, I would like to ask the NOP if  
7 they have a preference, as of this time,  
8 whether they would like guidance or whether  
9 they would like a recommendation.

10 MS. BAILEY: Melissa Bailey for  
11 NOP.

12 We talked about this a little bit  
13 on the Livestock Committee call as well, but  
14 for the benefit of the Board, our preference  
15 would be, as with other sort of practice  
16 standards that the Board may have recommended,  
17 it is a little bit different than the National  
18 List where we are more constrained in  
19 following the recommendation provided by the  
20 Board.

21 With a practice standard  
22 recommendation, we, the agency, has some

1 latitude to look at the recommendation and  
2 decide what, based on the current regulations,  
3 the state of affairs, what is more appropriate  
4 for guidance versus rulemaking.

5 So, what we had discussed was that  
6 the Livestock Committee be clear in their  
7 intent, and that the program could, then, take  
8 that recommendation, sift through it, and  
9 figure out what is most suitable for a rule  
10 change versus more appropriate guidance. That  
11 was my understanding of what we discussed with  
12 the Committee.

13 CHAIR MIEDEMA: Nick?

14 MR. MARAVELL: Just a  
15 clarification. You said the EU requires you  
16 feed grass/plant material through the winter.  
17 Are we talking about a green pasture with  
18 grass with roots in the ground?

19 MR. DRYAK: No, the regulation  
20 talks about feeding a silage grass.

21 MR. MARAVELL: So, this is  
22 something that has been harvested and kept in

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1 silage form?

2 MR. DRYAK: Correct.

3 MR. MARAVELL: And you do that?

4 MR. DRYAK: And I have done it as  
5 an experiment. Right now, I am in a position  
6 where I do not have an ongoing house  
7 operating. But I am in another business that  
8 relies upon eggs from the organic egg  
9 industry. I make liquid egg products and  
10 frozen organic egg products.

11 And so, I look into millions of  
12 eggs' interiors and I get to see what kind of  
13 quality comes through. So, that is a long-  
14 winded answer.

15 CHAIR MIEDEMA: John Foster?

16 MR. FOSTER: Hi. Thanks. I think  
17 you might be just exactly the right person to  
18 ask this question I have been dying to ask  
19 about European models. I was kind of jogged  
20 by the photos you had up there.

21 I am sure that there are hawks and  
22 falcons and coyotes in Europe, too. The last

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1 time I checked, they had all those.

2 MR. DRYAK: Yes. Yes.

3 MR. FOSTER: And they had all the  
4 human pathogens that --

5 MR. DRYAK: Yes.

6 MR. FOSTER: -- not all, but  
7 certainly enough to carry their own.

8 MR. DRYAK: Yes.

9 MR. FOSTER: So, in those systems,  
10 what is either the procedural or the consumer  
11 expectation difference that would allow those  
12 either predators or food safety to not be a  
13 problem? Or are they? Do they have the same  
14 problems and are tolerated differently or have  
15 not the problems? And in the case of the  
16 latter, why don't they have those problems?

17 MR. DRYAK: First of all, in  
18 Europe eggs are not washed and they are not  
19 refrigerated. And so, when you go into a  
20 store, they are in the ambient temperatures.

21 The European poultry people will  
22 argue that you compromise the integrity of the

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1 egg when you wash it because you wash off the  
2 oil film that is there. An egg has 17 to 18  
3 thousand pores in that surface, and when you  
4 wash it, you, then, remove one of the barriers  
5 to the interior of the egg.

6 On the numerous farms I have been  
7 on in Europe for the purpose, I have been  
8 invited there because I go and I have  
9 exhibited in Germany and in London, and I  
10 exhibit U.S. organic eggs, not USDA NOP. I  
11 mean it is on my label, but I strive for a  
12 higher standard. And I do presently move  
13 products overseas, the product part, not the  
14 shell egg.

15 But in being on the numerous  
16 operations, when I show that picture of the  
17 many birds out there in a pasture pretty far  
18 away from a house, that is real. They do it.

19 CHAIR MIEDEMA: Sir, would you  
20 mind addressing the question about the  
21 predators?

22 MR. DRYAK: They appear, the

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1 poultry producers appear to spend more time  
2 with their birds. It is not just feed them  
3 and collect the eggs and move on. And they  
4 appear to use dogs to protect, llama.

5 CHAIR MIEDEMA: Thank you.

6 Last question, Wendy?

7 MS. FULWIDER: Could I ask what  
8 the size of the farms are over there, how many  
9 hens per farm?

10 MR. DRYAK: Well, I can tell you  
11 from my experience that there will be, there  
12 could be a farm with 20,000 hens in four  
13 different groupings of 5,000. They are  
14 divided.

15 Some of the technology like the  
16 electric fences that exist today called web  
17 electric fences, all of that innovation is  
18 from Europe. All the cages, the systems we  
19 use in U.S. barns, most of them, if not all of  
20 them, are made where the innovation occurs,  
21 which is in Europe.

22 CHAIR MIEDEMA: Thank you.

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1 MR. DRYAK: Okay. Thank you.

2 CHAIR MIEDEMA: Richard Mathews is  
3 up next. Julie Weisman is standing by.

4 MR. MATHEWS: Richard Mathews, NOP  
5 Solutions, Incorporated, commenting on the  
6 animal welfare recommendation, all warm  
7 fuzzies removed due to time constraints.

8 Any rulemaking on this  
9 recommendation will be classified as  
10 significant for purposes of Executive Order  
11 12866. It will be reviewed by the Office of  
12 Management and Budget and other federal  
13 departments such as the Small Business  
14 Administration, Environmental Protection  
15 Agency, and the Food and Drug Administration.

16 Executive Order 12866 requires in  
17 part that NOP identify and assess the problem  
18 to be addressed; assess the regulation's costs  
19 and benefits; base decisions on information  
20 concerning the regulation's needs and  
21 consequences; identify and assess alternative  
22 forms of regulation; avoid regulations that

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1 are inconsistent, incompatible, or duplicative  
2 of other regulation; tailor regulations to  
3 impose the least burden.

4 This regulation does not define  
5 the problem, analyze the problem, or develop  
6 possible solutions. It provides NOP with  
7 nothing that enable it to comply with  
8 Executive Order 12866.

9 Passing this recommendation will  
10 signal change in the absence of actual change.  
11 While NOP wrestles with what to do about this  
12 recommendation, some certifying agents will  
13 try to implement its provisions, thereby  
14 increasing the problem of inconsistency in  
15 standards application.

16 Further, those seeking instant  
17 application of the recommendation will  
18 generate illegitimate complaints. These  
19 complaints will incite uncertainty in the mind  
20 of consumers, to the detriment of producers.

21 One example: in May 2002, Analyst  
22 B heard testimony regarding dioxin hazards and

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1 developed a compromise outdoor access  
2 position. They also acknowledged that porches  
3 would comply with outdoor access. What  
4 changed in the past nine years?

5 Please withdraw this  
6 recommendation until you have defined the  
7 problem, analyzed the problem, documented  
8 alternative solutions, and explained and  
9 documented what has changed since May 2002,  
10 thereby, providing NOP with an actionable  
11 recommendation. Use Appendix A of your Policy  
12 Manual as your guide.

13 CHAIR MIEDEMA: Thank you.

14 Any questions for Richard Mathews?

15 (No response.)

16 Julie Weisman is up next. Peggy  
17 Miars is standing by.

18 Our lunch recess today will be  
19 from 12:10 to 1:00 p.m. Actually, we will see  
20 when we start.

21 (Laughter.)

22 MS. WEISMAN: All right. Hello.

1 My name is Julie Weisman. I am a former NOSB  
2 member. I was one of the handling  
3 representatives from 2005 to 2010. I chaired  
4 the Handling Committee for several years and  
5 was also Vice Chair for a year.

6 Despite what is up on the screen,  
7 my comments at this time are my personal  
8 opinions. They do not necessarily represent  
9 those of my companies, Elan Vanilla and  
10 Flavorganics or other groups of which I am a  
11 member.

12 In the runup to this spring 2011  
13 meeting, I am seeing a pattern with regard to  
14 Sunset recommendations that is disturbing to  
15 me and which I fear belies a general attitude  
16 regarding the National List.

17 And I was feeling the need to  
18 question this before I arrived in Seattle.  
19 Even though I have things I would like to say  
20 about lots of specific things, I felt this was  
21 way more important. And sitting in the room  
22 for the past two days has strengthened that

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1 feeling.

2           During my tenure on the Board, our  
3 charge during Sunset, as we understood it, was  
4 to evaluate whether there was any new evidence  
5 that a material was harmful to humans or the  
6 environment or that a more benign material was  
7 available to replace it. If neither of these  
8 conditions was met, we were to respect the  
9 work of previous Boards.

10           It has been long understood in  
11 these meeting rooms that, once a material is  
12 listed and products have entered the stream of  
13 commerce, the disruption of having access to  
14 ingredients, either by handlers or by farmers,  
15 if that is cut off without adequate  
16 replacement, it is detrimental to our entire  
17 organic community.

18           Such disruption would, obviously,  
19 be justified in the wake of credible, new  
20 revelations about human and/or environmental  
21 health and safety. But, short of that, it was  
22 not justifiable; it was not seen that way.

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1           The Crop Committee's packet of  
2           Sunset recommendations and the discussion that  
3           I have witnessed here over the past two days  
4           flies in the face of the work of previous  
5           Boards. Almost half of the 12 synthetic  
6           materials, crop materials, up for Sunset  
7           review, the Crop Committee has recommended  
8           against relisting in situations where no new  
9           information on human or environmental toxicity  
10          or about the availability of alternatives has  
11          emerged.

12           It appears to me that a sentiment  
13          has overtaken some Committees, maybe not the  
14          whole Board, that the mission of the NOSB is  
15          to make the National List as short as  
16          possible, and that a shortened National List  
17          is equated with greater organic integrity.  
18          And I challenge this view.

19           I would like to underscore the  
20          words of our Deputy Administrator McEvoy on  
21          Tuesday morning, that there is no requirement  
22          in the statute to shorten the National List.

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1 I touched on this issue somewhat in my  
2 comments before this Board last fall in  
3 Madison, and I will refer you back to  
4 -- anyway, all I have time to say is that the  
5 idea of adding a material --

6 CHAIR MIEDEMA: Thank you.

7 MS. WEISMAN: -- one material to  
8 the list often results in the most number of  
9 acreage in production, and the beneficial  
10 result of that is the purpose for our being  
11 here at all.

12 Thank you.

13 CHAIR MIEDEMA: Thanks, Julie.

14 Any questions for Julie Weisman?  
15 John Foster?

16 MR. FOSTER: Could you refer us  
17 back to any document or resource, perhaps the  
18 one you were about to refer to a moment ago,  
19 that would help clarify or elucidate, expand  
20 on your opinion?

21 MS. WEISMAN: I was referring to  
22 my comments last fall at the meeting in

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1 Madison, and I made a comment that had mostly  
2 to do with 606 and the issue of commercial  
3 availability. And I guess I would encourage  
4 people to go back over transcripts and  
5 documents written by myself and other people  
6 regarding that because it gives many, many  
7 examples of situations where adding an item to  
8 606, for instance, you know, on the outside it  
9 is making the list longer. It is adding a  
10 material that is not organic. But it is also  
11 providing a way, they are providing ways to  
12 actually increase organic integrity.

13 Colors was an example. Even  
14 though the reason why they came off the list  
15 was a bit unique, people say one item came off  
16 and 18 items went on, but those, the addition  
17 of those 18 items increased the organic  
18 integrity of products because they were  
19 replacing synthetics that had been used.

20 MR. FOSTER: Thank you.

21 CHAIR MIEDEMA: Katrina, did you  
22 have a question?



1 MS. HEINZE: I think Jay was ahead  
2 of me, but, yes, I do.

3 MR. FELDMAN: Yes, first of all,  
4 as you know, when the Committee deliberates on  
5 these things, they look at the record and  
6 transcripts going back to the first Board of  
7 the NOSB, and many of the materials, I would  
8 say a significant number, at that time were  
9 put on the list with an understanding that  
10 they would be reevaluated because there were  
11 concerns about missing data, and so forth.

12 But, just to give you an example,  
13 my question goes to the antibiotics. Are you  
14 including that, antibiotics, which includes  
15 two of our materials, streptomycin and  
16 tetracycline, among those that the Board is  
17 not, in your judgment, following protocol?

18 MS. WEISMAN: I would say yes. I  
19 would say yes.

20 MR. FELDMAN: Okay. Because, as  
21 you know, the Board voted on tetracycline in  
22 2008 --

1 MS. WEISMAN: I was on the Board.

2 MR. FELDMAN: -- to remove it by  
3 2011. So, that would, in effect, force us to  
4 relook at that with a lens, don't you think,  
5 with a lens that would be very critical of its  
6 continued use? And the same would go for  
7 streptomycin, wouldn't you think, because of  
8 the history on the Board where we have seen  
9 numerous votes that either were very close --

10 CHAIR MIEDEMA: Please ask your  
11 question.

12 MR. FELDMAN: The question is,  
13 since the votes were very close, don't you  
14 think the Board has a duty in that context to  
15 sort of evaluate the thing more carefully than  
16 just relying on a very close vote?

17 MS. WEISMAN: Certainly, but I  
18 believe that there are, it feels like there  
19 are factors influencing -- I mean, first of  
20 all, that was a compromise. I was on that  
21 Board. I was part of that vote, and putting  
22 the extension was a compromise.

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1           And I think that I would never  
2 argue against taking a look, but I feel like  
3 the same information can always get  
4 interpreted in different ways. I don't  
5 believe that there is new information from  
6 today from the time that was vote was taken.

7           CHAIR MIEDEMA: Thank you, Julie.

8           Board members, I want to remind us  
9 all what we agreed on at the beginning of this  
10 meeting, and what the NOP published an  
11 emergency Federal Register notice on. That is  
12 three minutes for public comment, and, then,  
13 we agreed two minutes of repartee questions to  
14 clarify.

15           Let's make sure that we don't  
16 debate the public, that what we really do is  
17 respect the fact that people travel long  
18 distances to share their opinion, and we want  
19 to have a chance to ask them questions. But  
20 really let them share their opinion.

21           We have started to drift a bit  
22 from that five minutes. So, we are going to

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1 make sure and tighten that back up in the  
2 second half of the day, and recess now for  
3 lunch.

4 It is quarter after. Let's all be  
5 seated at 10 after 1:00.

6 (Whereupon, the foregoing matter  
7 went off the record at 12:14 p.m. and resumed  
8 at 1:13 p.m.)  
9  
10  
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22



1           The second thing is that yesterday  
2 during the Materials Committee presentation on  
3 classification, Colehour asked me a very good  
4 question which was, is that "and" or "or"?  
5 And I answered incorrectly. And thank you for  
6 Calvin for being persistent.

7           So, the answer is the  
8 recommendation says it is chemical change or  
9 present at a significant level. And I don't  
10 know where my brain was. That was incorrect.  
11 So, either of those two things makes something  
12 synthetic.

13           So, if you have questions, we can  
14 talk about it tomorrow, but I wanted to get  
15 that on the record.

16           CHAIR MIEDEMA: Thank you,  
17 Katrina.

18           Okay. Any other announcements or  
19 clarifications before we proceed with public  
20 testimony?

21           (No response.)

22           Okay. First up, then, is Darren

1 Jones at the podium.

2 And it looks like we will need to  
3 do a little switcharoo here, that Darren is  
4 not quite ready. So, Robin, do you mind going  
5 ahead? Okay.

6 MS. ALLAN: Everybody feel ready  
7 here? Okay.

8 All right. Hello. My name is  
9 Robin Allan. I'm the Director of Grower and  
10 Livestock Certification for CCOF. We are the  
11 largest certification agency in the United  
12 States. So, we are representing a fair number  
13 of livestock producers here.

14 We strongly support the move of  
15 the NOSB towards explicitly addressing animal  
16 welfare in the NOP standards. We are  
17 committed to the long-term development of  
18 enforceable and consistent standards.

19 We believe that organic can be,  
20 and should be, the leading option for  
21 livestock certification, and organic producers  
22 should have no reason to seek additional

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1 humane certification.

2 We thank you for the obvious  
3 effort, Wendy, that you put into taking the  
4 public comment into account and making a  
5 number of the necessary changes to the two  
6 documents that you presented yesterday. From  
7 a non-Board member point of view, it was very,  
8 very difficult to follow the conversation and  
9 the changes that were made, but we really  
10 thank you for making those publicly available  
11 and posting those online, so that we could  
12 look them over.

13 Up until yesterday, I was prepared  
14 to come up here to advocate that the proposals  
15 be withdrawn and not be voted on, and be  
16 reworked. After yesterday's Livestock  
17 Committee presentation, I am able to say that  
18 I think that the proposals can move forward  
19 to the NOP. I don't necessarily think that  
20 these need to end up being fully in  
21 rulemaking, but I do really support, we have  
22 stated this before, and I continue to support

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1 a lot of this to go to guidance. And I trust  
2 that the program can differentiate between  
3 what should be guidance and what should be  
4 rulemaking.

5 I do think that both the proposals  
6 have some significant flaws in the specifics,  
7 but we will be prepared to submit more  
8 detailed comments during a future rulemaking  
9 process where we have more time. This is very  
10 difficult, a short period.

11 I really recognize that the Board  
12 feels you have beat this proverbial horse to  
13 death, that we don't beat the cows, just the  
14 horses, and you are ready to move forward.  
15 You know, Tina said there's a push to do  
16 something, and I really recognize that.

17 So, I do want to say that, as a  
18 general point, organic livestock producers are  
19 really suffering under the weight of increased  
20 burdens of paperwork and increased regulation.  
21 Please let's be very careful about unchecked  
22 increases on requirements for OSP

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1 descriptions, operator documentation, and  
2 inspection requirements. Such requirements  
3 often are unrealistic and do not necessarily  
4 improve animal welfare or ensure organic  
5 integrity.

6 So, thank you very much.

7 CHAIR MIEDEMA: Thank you, Robin.

8 Any questions? Reuben and, then,  
9 Nick.

10 MR. WALKER: I was talking, and I  
11 didn't get your organization. You mentioned  
12 that you were in support of the recommendation  
13 of the Livestock Committee?

14 MS. ALLAN: Yes, I work for CCOF.

15 MR. MARAVELL: Yes, I was just  
16 wondering if you could comment on the  
17 increased paperwork requirements. You are  
18 probably going to hear this from me quite a  
19 bit because I am representing the producers.

20 MS. ALLAN: Yes.

21 MR. MARAVELL: What do you feel  
22 has contributed to that, and is there anything

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1 that the certifiers can do independently?  
2 Just with what is there now, is there anything  
3 certifiers can do to reduce that paperwork  
4 burden? Or do you feel that you can't reduce  
5 it on your own? So, what's contributed to it,  
6 and can you do anything now?

7 MS. ALLAN: Yes. Specifically,  
8 the implementation of the pasture rule for  
9 ruminants over the last year, starting last  
10 June and going through to this June, has  
11 really significantly increased the paperwork  
12 burdens. And a lot of the way that that rule  
13 was written includes all the specifics that  
14 must be described in the organic system plan  
15 and must be documented.

16 So, we find that even for a  
17 completely free-range beef producer that may  
18 feed a couple bales of alfalfa in the winter,  
19 they now have to keep very detailed documented  
20 records of their dry matter intake, dry matter  
21 demand in a way that doesn't really improve  
22 the organic integrity, but is required because

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1 the rule says that it must include that.

2 We would really like to decrease  
3 those requirements, but are not sure how to do  
4 that well, enforcing the rule as it is  
5 written.

6 CHAIR MIEDEMA: Mac?

7 MR. STONE: Which part might you  
8 like to see in rulemaking versus guidance?

9 MS. ALLAN: I definitely think  
10 that guidance is more appropriate for the  
11 specific stocking rate densities. I think  
12 that those are somewhat untested in the  
13 organic community, and that putting those  
14 directly into rulemaking could really be  
15 problematic.

16 I would say the same thing for  
17 some of the requirements, some of the  
18 definition-type items, too, such as soil, the  
19 definition of soil. I think that these things  
20 can have some long-term repercussions that are  
21 often hard to anticipate right away.

22 CHAIR MIEDEMA: Thank you.

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1                   Next up is Darren Jones or, sorry,  
2                   Darren Williams, and Terry Shistar is standing  
3                   by.

4                   MR. WILLIAMS: Hello. Darryl  
5                   Williams with Oregon Tilth.

6                   Let's start with chlorine. We  
7                   agree with the annotation change by the  
8                   Handling Committee for chlorine materials and  
9                   support the relisting of chlorine. However,  
10                  we request that the Crops Committee revise  
11                  their annotation to be consistent with the  
12                  Handling Committee and suggest the annotation  
13                  from the Crops Committee is not clear or that  
14                  the suggested annotation for the Crops  
15                  Committee is not clear in stating that  
16                  chlorine materials are allowed for direct food  
17                  contact.

18                  We concur with the OTA and others  
19                  that the annotations for both handling and  
20                  crop usage should allow for alternative  
21                  intervention steps and/or testing which will  
22                  reduce and verify that the residual will

1 satisfy the Safe Water Drinking Act.

2 We ask that clarification will be  
3 made after this regarding the labeling of  
4 organic commodities, 100 percent organic or  
5 organic, which are sanitized in accordance  
6 with the new annotation.

7 Vitamins and minerals. We support  
8 the renewal of vitamins and minerals to the  
9 National List, but do not support the current  
10 annotation for vitamins and minerals, as it  
11 doesn't support nutrients which were  
12 originally supported by the NOSB.

13 We do not fully support the  
14 revised annotation from the NOSB.  
15 Verification of what is allowed could be  
16 problematic for the certifier. An example, if  
17 we are presented with a nutrient and we review  
18 the regulation and verify compliance based on  
19 our research, and down the road a complaint is  
20 filed because we approved X, Y, Z, how will  
21 the NOP determine if X, Y, Z is allowed or  
22 not? Some certifiers are saying the only way

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1 to know is a prescriptive list, but,  
2 generally, we don't support a closed or  
3 prescriptive list.

4 Additionally, all certifiers will  
5 need guidance and very good communication with  
6 the NOP in making certification compliance  
7 decisions based on this recommendation.

8 Corn steep liquor. We support the  
9 Crop Committee's recommendation listing of  
10 corn steep liquor as non-synthetic. Sulfur  
11 dioxide does not chemically change the corn  
12 steep liquor when consulting the definition of  
13 chemical change.

14 For the proposed annotation, we do  
15 not support the reoccurring process listing,  
16 quote, "via the traditional countercurrent  
17 corn wet milling process" as this causes a  
18 burden on certifiers to determine if the  
19 process follows the exact process denoted by  
20 this statement.

21 Sunset materials, tocopherols.  
22 Agree with the Committee to relist

1       tocopherols, but would like an annotation  
2       change or some sort of clarification be made  
3       that the use of organic rosemary extracts as  
4       opposed to a non-organic source of rosemary  
5       extract.

6                   CHAIR MIEDEMA: Thank you, Darryl,  
7       and my apologies for saying your name wrong  
8       twice.

9                   MR. WILLIAMS: That's fine.

10                  CHAIR MIEDEMA: It looks like a  
11       couple of questions. Steve and, then, Jay.

12                  MR. DeMURI: Can you reiterate  
13       your agreement or non-agreement with the  
14       nutrient, vitamins, and minerals proposal? I  
15       am interesting in what exactly you would like  
16       to see.

17                  MR. WILLIAMS: So, we are not in  
18       current support of the current annotation. We  
19       like the way it is going with the revised  
20       annotation, but we believe that it is not  
21       defined enough. Yet, we don't want a  
22       completely closed list because of the

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1 allowance for anything new in the future that  
2 is found, and, then, you know, if the FDA is  
3 going to list that right away, which is  
4 probably not going to happen.

5 CHAIR MIEDEMA: Steve?

6 MR. DeMURI: No. 2, so a followup.

7 MR. WILLIAMS: Okay.

8 MR. DeMURI: So, you don't like  
9 the annotation as it currently stands. What  
10 if there was no annotation, just nutrient  
11 vitamins and minerals, period?

12 MR. WILLIAMS: Well, from what we  
13 saw yesterday in the list that was brought up,  
14 because of that, we wouldn't necessarily agree  
15 with no annotation, either. I think the  
16 revised annotation that is coming out is the  
17 best one by far, but I think it needs to be a  
18 little more detailed as to where people can go  
19 to find what they need.

20 CHAIR MIEDEMA: I have one more  
21 question, and, then, Jay, we will get to you.

22 So, when you say "revised

1 annotation", did you mean the recommendation  
2 the Handling Committee published to  
3 regulations.gov?

4 MR. WILLIAMS: Yes. Yes.

5 CHAIR MIEDEMA: Okay. Thank you.

6 Yes, we have had a lot of information out  
7 there. I just wanted to make sure --

8 MR. WILLIAMS: Yes.

9 CHAIR MIEDEMA: -- we all knew  
10 what we were talking about.

11 Jay?

12 MR. FELDMAN: Can you give us an  
13 example of -- this relates to the Crops'  
14 motion -- an example of a product or a process  
15 that you would think could be eliminated as a  
16 result of the language that has been proposed  
17 by the Crops Committee?

18 MR. WILLIAMS: I am not really --  
19 could you repeat? I am not really --

20 MR. FELDMAN: I am trying to  
21 figure out if there is a specific -- you said  
22 that you don't think the current language will

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1 allow chlorine products to come into direct  
2 contact with food. I think that is what you  
3 said.

4 MR. WILLIAMS: Yes.

5 MR. FELDMAN: So, I am trying to  
6 ask if you could give us an example of a  
7 product or products or even process that would  
8 be at risk if this language were to be  
9 adopted.

10 MR. WILLIAMS: So, I do agree with  
11 what the Handling Committee is proposing.

12 MR. FELDMAN: The Crops Committee.

13 MR. WILLIAMS: Okay.

14 MR. FELDMAN: I am talking about  
15 the Crops Committee.

16 MR. WILLIAMS: Okay. So, the  
17 Crops Committee, I think that language should  
18 be added to their annotation as well, so it is  
19 clear to the farmers for post-handling harvest  
20 processes that they know what they can use,  
21 and that it is clear to certifiers as well.

22 MR. FELDMAN: Right.

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1 CHAIR MIEDEMA: Thank you.

2 Okay. Next up is -- and, by the  
3 way, I stopped Jay there just because we were  
4 at about the six-minute mark -- let's see,  
5 Terry Shistar is next.

6 And, Lisa, I didn't quite get who  
7 was standing by on the list. Thank you.

8 Bart Alexander is standing by, and  
9 Mel Gaiman is after that.

10 MS. SHISTAR: Okay. I have got  
11 some slides up there.

12 I am Terry Shistar, and I am on  
13 the Board of Directors of Beyond Pesticides,  
14 and I have been for something like 26 years.

15 And I submitted several written  
16 comments. So, this is going to be fairly  
17 quick.

18 Next slide.

19 The first thing I want to talk  
20 about is corn steep liquor. We support the  
21 minority view that corn steep liquor is  
22 synthetic according to the policies adopted by

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1 the Board because it is the result of chemical  
2 change produced by the introduction of a  
3 synthetic.

4 Every independent scientist the  
5 Board has heard from has found CSL to be  
6 synthetic, including the USDA scientists who  
7 were requested to give their evaluation and  
8 OMRI.

9 Next slide, please.

10 And when the Committee and/or  
11 Board rejects the scientific expert opinion  
12 that they have invited, it makes the decisions  
13 appear arbitrary and capricious.

14 Next slide, please.

15 On to antibiotics. The use of  
16 antibiotics contributes to resistance to  
17 antibiotics in human pathogens, and this is an  
18 important human health impact that I am afraid  
19 that the Board is not taking, well, it has not  
20 been hearing from, hearing about very much.

21 If bacteria on the plants and in  
22 the soil are sprayed with an antibiotic, those

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1 with genes for resistance to the chemical  
2 increase compared to those susceptible to the  
3 antibiotic. And this can be any bacteria,  
4 whether it is the fire blight bacteria or  
5 natural soil-dwelling bacteria, whatever.

6 Those genes may be taken up by  
7 other bacteria by a number of mechanisms  
8 collectively known as horizontal gene  
9 transfer. They include transformation, in  
10 which the bacteria pick up DNA that is free in  
11 the environment, for example, from dead and  
12 degraded bacteria; conjugation from direct  
13 cell-to-cell contact, which may involve  
14 unrelated bacteria and is mediated by plasmids  
15 or transposons, and transduction, the transfer  
16 of DNA via phage.

17 Next slide, please.

18 So, this is just a picture, and I  
19 think you saw it in the Committee's  
20 presentation.

21 Next slide, please.

22 So, once the resistant genes are

1 present in any bacteria, they increase the  
2 pool of resistance genes and the likelihood  
3 that human pathogens will acquire that  
4 resistance. And I passed on an article to  
5 that effect.

6 Next slide, please.

7 The next thing I want to talk  
8 about is the significance of synthetic  
9 residues. And we support the minority  
10 proposed definition.

11 Next slide, please.

12 The majority's reliance on  
13 standards set under other statutes is contrary  
14 to the Organic Foods Production Act.  
15 Standards set under FIFRA, the FFDCA, and the  
16 Clean Water Act rely on risk assessments that  
17 in various ways discount health and  
18 environmental effects.

19 As someone who has taught courses  
20 in risk assessment and hazardous materials  
21 policy, I know that the number of things that  
22 OFPA requires that you consider go far beyond

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1 those other laws.

2 Next slide.

3 And this was covered this morning,  
4 but I thought I would put it up here because  
5 this shows another example of where the actual  
6 tolerances are insufficient.

7 CHAIR MIEDEMA: Thank you very  
8 much, Ms. Shistar.

9 Any questions? Katrina?

10 MS. HEINZE: I am wondering if you  
11 could tell me what makes a scientist  
12 independent, from your perspective.

13 MS. SHISTAR: Well, in this  
14 regard, I think an independent scientist is  
15 one who doesn't stand to benefit from the way  
16 this turns out, the decision turns out.

17 Colehour -- or --

18 (Laughter.)

19 CHAIR MIEDEMA: Colehour?

20 MR. BONDERA: Thank you, Dr.

21 Shistar.

22 I think I want to raise that

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1 question, too, because it is a little  
2 confusing to me. The Crops Committee really  
3 didn't listen to the opinions of the  
4 consultant scientists. And I wonder if you  
5 could expand on that in terms of this process  
6 related to the CSL decision that was made, and  
7 specifically, on the topic, my personal  
8 interest -- and I don't know if you will get  
9 to this or not, but I think this came up  
10 earlier in the CSL dialog -- was related to  
11 the distinction between chemical and  
12 biological change processes going on with the  
13 corn steep liquor issue. I don't know if you  
14 are going to fit that in or not, but  
15 specifically about --

16 MS. SHISTAR: Well, I might be  
17 able to if Lisa will give me the next couple  
18 of slides. Go on.

19 Well, I have some quotes here from  
20 Dr. David Johnston from what he submitted.  
21 And I just wanted to highlight, I am going to  
22 mention the things that are in bold here, so

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1 I can flip through them fast.

2 He mentioned that the breaking of  
3 disulfide bonds does occur as the result of  
4 sulfur dioxide addition.

5 Can I have the next one?

6 There are new chemicals formed due  
7 to the addition of sulfur dioxide, and these  
8 are formed during the breaking of disulfide  
9 bonds.

10 Next slide.

11 And as to whether this is a  
12 necessary part of the countercurrent wet  
13 milling process, he quoted from this text. I  
14 guess that is about it.

15 CHAIR MIEDEMA: Any more  
16 questions, just real quick as we wrap up?

17 (No response.)

18 Thank you.

19 MS. SHISTAR: Thanks.

20 CHAIR MIEDEMA: Bart Alexander is  
21 next. Are you here?

22 (No response.)

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1                   We are going to keep moving. Mel  
2 "Gaiman" or "Gehman"?

3                   George Bass is standing by.

4                   MR. GEHMAN: Good afternoon, Board  
5 and Program.

6                   I am Mel Gehman, Heritage Poultry  
7 Management from Pennsylvania.

8                   I have worked in poultry husbandry  
9 and health and nutrition all my life. I grew  
10 up on a poultry farm that was a layer pullet  
11 farm with cage-free birds. That is the way  
12 the birds were back then.

13                  I later worked, after being  
14 educated in animal science, I worked for USDA  
15 at the Agricultural Research Center,  
16 Beltsville, Maryland, in the Poultry Branch.  
17 I also served on the Pennsylvania Certified  
18 Organic Board.

19                  This public input is a very vital  
20 part of the organic egg program as well as  
21 other organic programs. At this very critical  
22 time, we are making the organic egg program

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1 more relevant to the consumers' viewpoint.

2 At the same time, the egg safety  
3 program is being enforced. This is very  
4 important for us to get this right, and we  
5 must finish the job.

6 Our management company has been  
7 involved in producing organic eggs under  
8 certification since 1997, and we have focused  
9 on doing it right and have anticipated a  
10 strengthening program.

11 Our flocks have been under the Egg  
12 Quality Assurance Program, specifically, the  
13 Pennsylvania Egg Quality Assurance Program,  
14 and our eggs have been under the PEQAP and  
15 certified humane seal.

16 There are two items that I would  
17 like to address in relation to the FDA egg  
18 rule for egg safety. We recommend that  
19 pullets are not put out during the growing  
20 period. The pullets must be grown up, strong,  
21 and healthy with a well-developed immune  
22 system. The hens receive their last SE

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1 vaccination at 13 weeks of age with three  
2 weeks to build immune response and recover  
3 from the handling stress before they are  
4 adapted to a new environment.

5 The other item, the house  
6 openings, to meet the FDA rule of keeping the  
7 house tight, we think there is excess openings  
8 at the five foot per thousand birds. We think  
9 that two foot per thousand would be adequate,  
10 and has been shown to be adequate in our  
11 systems for the birds to go outside and enter.

12 CHAIR MIEDEMA: Thank you.

13 Any questions?

14 (No response.)

15 Thank you, sir.

16 MR. GEHMAN: Thank you.

17 CHAIR MIEDEMA: George Bass is up  
18 next. Trudy Bialic is standing by.

19 MR. BASS: Thank you very much for  
20 all the great work of the past and the present  
21 for the NOP, the volunteers, the NOP staff,  
22 the producers, and the public.

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1                   In Massachusetts, we are the only  
2 large egg farm left, and we have an organic  
3 farm. As you know, the largest egg company in  
4 the United States has about 27 million hens.  
5 I bought an old farm that was out of business.  
6 They had 60,000 hens and pullets. Now we have  
7 about 68,000 hens in one place.

8                   Now we give our hens access to the  
9 outdoors on porches in good weather. The AMS  
10 allowed us to use porches in 2002.

11                  Here are the three points on  
12 porches:

13                  No. 1, there are many diseases,  
14 worms, and rodents on soil. There are five  
15 strong, good veterinarians that told us that  
16 we should not put hens on the soil. Two vets  
17 have Ph.D.s. We have those letters from the  
18 scientists.

19                  We have neighbors on the left, on  
20 the front, on the right, in the back.  
21 Massachusetts has their own area. We just  
22 don't have space. If we had all the hens on

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1 the soil, the manure would put out an awful  
2 stench.

3 No. 3, the Quabbin Reservoir is 65  
4 miles west of Boston and 40 communities use  
5 this for water. Every day they use 200  
6 million gallons of water.

7 There was a small brook close to  
8 the farm. If there were hens on the soil, the  
9 manure would contaminate the brook through  
10 runoff. The brook goes on a river and, then,  
11 goes to a huge aqueduct for nine miles to the  
12 reservoir. I present you with two maps of the  
13 area.

14 Thank you for your time.

15 CHAIR MIEDEMA: Thank you very  
16 much, Mr. Bass.

17 Any questions?

18 (No response.)

19 Thank you very much.

20 Trudy, you are up next.

21 Joan Smiley is standing by.

22 MS. BIALIC: Thank you for your

1 time.

2 Our company, PCC Natural Markets,  
3 has nine certified organic stores, soon to be  
4 ten, 46,000 active member/owners. We are the  
5 largest consumer-owned, consumer-operated  
6 grocery retailer in the country. Today I am  
7 speaking for management.

8 We realize that synthetic nutrient  
9 additives was postponed as a topic until this  
10 fall, but we already have had to face consumer  
11 questions and concerns. So, we feel compelled  
12 to share our experience today.

13 It is very easy to empathize with  
14 the expertise and time needed to review  
15 individual additives; we know that. But the  
16 recommendation to allow any synthetic additive  
17 deemed a nutrient without petition and review  
18 we feel is an abdication of responsibility  
19 vested in NOSB for very good reason.

20 Organic consumers expect that, if  
21 any synthetics are allowed, each one is vetted  
22 through the formal petition and review

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1 process. To surrender that power that we  
2 fought so hard to give you to protect the  
3 consumers' interest, very hard fought and hard  
4 won, to surrender that authority voluntarily  
5 betrays public trust.

6           When a grandmother recently asked  
7 if the DHA and ARA in a certain formula was  
8 safe for her grandson, we had to answer in all  
9 honesty, in the interest of transparency, that  
10 NOSB did not vet those additives. Yes, we  
11 realize there are complaints of side effects.

12           For these reasons, we feel that  
13 companies that have been using DHA and ARA,  
14 knowing the petition and review process,  
15 should not get an automatic pass.

16           PCC has discontinued, suspended  
17 the sale of organic products with these  
18 additives. We pulled the infant formula, flax  
19 oil, and children's vitamins two weeks ago.

20           We support enforcement action that  
21 would require removing these questionable  
22 synthetics from products bearing the organic

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1 seal.

2 We ask you to honor the mandate  
3 given NOSB to protect the consumers' interest.  
4 We sell trust, really, much more than we are  
5 selling individual products. Please ensure  
6 that synthetic additives of any kind, nutrient  
7 or not, are the rarest exceptions, not  
8 business as usual, and that each one is  
9 reviewed individually from a precautionary  
10 position.

11 Consumers are very grateful for  
12 the NOP's age of enforcement.

13 Thank you very much. Any  
14 questions?

15 CHAIR MIEDEMA: Thank you, Trudy.

16 Any questions? Jay?

17 MR. FELDMAN: Thanks, Trudy.

18 So, what do you think we should  
19 do?

20 MS. BIALIC: Enforcement action.?

21 Well --

22 MR. FELDMAN: No, in terms of the

1 issue of moving forward on vitamins,  
2 nutrients, and minerals with open-endedness or  
3 with citations?

4 MS. BIALIC: Vitamins and minerals  
5 seem to be a different category than the basic  
6 nutrient additives.

7 MR. FELDMAN: Yes. Yes.

8 MS. BIALIC: So, I mean, to me, I  
9 am trying to address specifically the  
10 synthetic nutrient additive recommendation  
11 that was put forth by the Committee --

12 MR. FELDMAN: Okay.

13 MS. BIALIC: -- allow any without  
14 review and process --

15 MR. FELDMAN: Right.

16 MS. BIALIC: -- of synthetic  
17 nutrient additives.

18 MR. FELDMAN: Okay. Thank you.

19 CHAIR MIEDEMA: Do PCC consumers  
20 know that most of the essential vitamins and  
21 minerals are synthetic?

22 MS. BIALIC: I don't -- well,

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1 essential vitamins and minerals, I know that,  
2 for example, like vitamin C, for example, we  
3 have discussed that a lot of the vitamin C is  
4 synthetic. Yes, they do know that, for  
5 example. Yes.

6 CHAIR MIEDEMA: Thank you.

7 MS. SMILEY: My name is Joan  
8 Smiley, and I am withy Falcon Lab.

9 I am here to encourage the Board  
10 to expedite the review and approval of the  
11 ammonium nonanoate petition for use as an  
12 herbicide on food crops. To support this  
13 group in determining an appropriate  
14 annotation, we have included recommended  
15 wording in the petition.

16 Ammonium noanoate already has an  
17 EPA exemption from residue tolerance. And  
18 according to the EPA, residue due to the  
19 active application of ammonium nonanoate as  
20 labeled will likely not exceed that already  
21 present in nature and, in fact, would be  
22 indistinguishable.

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1           I would like to acknowledge the  
2 balance this group must consider. USDA has  
3 the goal of increasing organic acreage. To  
4 make this happen, barriers to productivity for  
5 organic farmers, weeds being the biggest  
6 issue, must have better solutions.

7           Organic farmers want to know that  
8 they can be productive within standards.  
9 Machine-driven weed-control methods are costly  
10 in time, money, and soil health, and  
11 currently-allowed methods only include  
12 expensive hand labor or very expensive,  
13 ineffective NOP-allowed herbicides.

14           Consumers want the safety that the  
15 term "organic" ensures for them and deserve  
16 integrity to the standards.

17           So, what is ammonium nonanoate?  
18 It is, by definition, soap. Soap is a  
19 significant part of everyday living. It is in  
20 every household and plays a huge role in most  
21 industries, including healthcare.

22           According to the EPA, residues

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1 from pesticide uses of soap salts are not  
2 likely to exceed the levels of naturally-  
3 occurring fatty acids in commonly-eaten foods.  
4 And the FDA lists ammonium salts, soap, as  
5 allowed food additives.

6 Soap is already allowed as a  
7 synthetic substance, and it is on 205.601 with  
8 restrictions to non-food. Ammonium soap salts  
9 are considered chemically-identical to  
10 potassium and sodium salts, which were placed  
11 on 40 CFR 180.950 in 2006.

12 That ammonium salts did not get  
13 the same placement seems an incongruent  
14 technicality that has significant lost  
15 economic opportunity to organic farmers.  
16 Ammonium nonanoate biodegrades in less than 24  
17 hours and will not translocate in soil. Thus,  
18 environmental persistence is not an issue.  
19 And according to the EPA, ammonium nonanoate  
20 is already on soil and crops naturally.

21 And I would like to clarify. A  
22 petition was submitted for a new substance

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1 addition rather than an annotation change for  
2 the broad category of soap because it has been  
3 discussed at these meetings that, if  
4 substances are considered, it should be in the  
5 specific, not in the general.

6 Ammonium nonanoate is a precise  
7 subset of the broad category of soap with a  
8 distinct CAS number, and is the only ammonium  
9 soap that both occurs in nature and has  
10 herbicidal qualities. Being precise makes  
11 sense for maintaining high standards.

12 Can an organic herbicide be  
13 effective? The answer is yes. Here is one  
14 example of a very persistent crop-draining  
15 weed, lamb's quarters. And less than one day  
16 later, the applied areas are weed-free.

17 It is a no-brainer that weeds are  
18 the most expensive productivity challenge to  
19 organic farmers. This substance would be one-  
20 third to one-fourth the cost of other options  
21 and would provide a much-needed tool for  
22 organic farmers.

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1                   In addition, ammonium nonanoate  
2                   meets all the criteria for all the  
3                   constituencies.

4                   CHAIR MIEDEMA: Thank you.

5                   Any questions? Jay Feldman?

6                   MR. FELDMAN: Okay. So, I have a  
7                   couple of questions. The current listing that  
8                   we have for fatty acids you are saying does  
9                   not include this. And ammonium nonanoate is  
10                  chemically-identical to what exactly?

11                  MS. SMILEY: Potassium and sodium  
12                  salts.

13                  MR. FELDMAN: Okay.

14                  MS. SMILEY: According to the EPA.

15                  MR. FELDMAN: Okay. Now, the  
16                  first question.

17                  MS. SMILEY: The first question is  
18                  soap-based herbicides are actually on  
19                  205.601 --

20                  MR. FELDMAN: Right.

21                  MS. SMILEY: -- with an annotation  
22                  for non-food use.

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1 MR. FELDMAN: I see. So, you  
2 would like, what you are looking for is an  
3 allowance in crop reduction, essentially?

4 MS. SMILEY: Correct, for a  
5 precise subset of what is already on the --

6 MR. FELDMAN: Of the fatty acids?

7 MS. SMILEY: -- allowed  
8 synthetics.

9 MR. FELDMAN: Okay. Thank you.

10 MS. SMILEY: Thank you.

11 CHAIR MIEDEMA: Sure.

12 Joan Smiley is up next.

13 (Laughter.)

14 Oh, I am so sorry. Okay.

15 Thank you, Joan.

16 Patty Lovera is up next. Alexis  
17 Randolph is standing by. We'll get it.

18 MS. LOVERA: Hi. My name is Patty  
19 Lovera. I work for an organization called  
20 Food and Water Watch. We are a consumer  
21 organization, and Food and Water Watch is a  
22 member of the National Organic Coalition.

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1           So, in the interest of time, I  
2 will just say that we support NOC's  
3 recommendation on conflict of interest.

4           And, also, my colleague Tyler  
5 Shannon talked about aquaculture on Tuesday.  
6 So, if folks have questions about aquaculture,  
7 I could answer those as well.

8           Also, I will just say very, very  
9 quickly on the animal welfare issue, you know,  
10 we share the concerns a lot of other groups  
11 have expressed about lining up these standards  
12 with the other standards that are out there  
13 and really taking a good look at that, because  
14 that is a huge, huge concern of the folks who  
15 are our members and supporters. They are very  
16 motivated by the animal welfare issue, and  
17 there is a lot of competition out there in the  
18 marketplace already.

19           I am going to spend a little bit  
20 more time on the nutrients issue. Given all  
21 of the changes and things that have happened  
22 in recent weeks, we are just interested in

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1       figuring out what can we deal with now. And  
2       it seems like the vitamins and minerals piece  
3       we can deal with now. I think there has been  
4       lots of good discussion about that.

5               I think we would echo a lot of  
6       what Trudy was just talking about, even on the  
7       other nutrients issues, about the control and  
8       organic having its own process for dealing  
9       with these, as opposed to kind of a blanket  
10      approval process. Blanket approvals without  
11      the annotations about which foods qualify for  
12      fortification with which vitamins and  
13      minerals, we think would be a mistake.

14             You know, the control that organic  
15      has, that the NOSB and the NOP have to create  
16      these lists with these kinds of conditions,  
17      puts us in a position, hopefully, to then use  
18      these systems to find the natural or non-  
19      synthetic alternatives. And if we give that  
20      control up, we miss that opportunity to use  
21      what is supposed to be this marketplace  
22      incentive about finding those replacements to

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1 keep the number of synthetic materials down.

2 So, I think we are very interested  
3 in tying that list of allowed synthetic  
4 vitamins and minerals to FDA's 104.2 list with  
5 annotations about what products qualify for  
6 fortification and not just letting that list  
7 be eligible for any food in organic, and it is  
8 worth, yes, a second line to talk about infant  
9 formula and to tie that to the 107.100 list.

10 The last think, quickly, I will  
11 talk about is corn steep liquor. Food and  
12 Water Watch supports the minority opinion that  
13 it is synthetic. We think a key component of  
14 that for our members and supporters who are  
15 consumers is being able to explain how that  
16 was decided. A widely-understood definition  
17 is really a basic consumer expectation. So,  
18 we think being able to explain that is  
19 important. We think the minority opinion does  
20 that well.

21 And we understand there are ripple  
22 effects from decisions, and that making this

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1 synthetic might change other materials that  
2 are already in the organic world. But we have  
3 to, when we have these opportunities to set a  
4 good precedent and make the right decision, we  
5 think that has to be the decision that is made  
6 because that is integrity ripple effect is  
7 just as important as the work ripple effect.

8 CHAIR MIEDEMA: Thank you, Patty.

9 Jay?

10 MR. FELDMAN: Thanks, Patty.

11 On the nutrient vitamins and  
12 minerals, what exactly is the proposal that  
13 you are supporting? You mentioned 104.2 and  
14 107 or 107.100. So, do you want those  
15 specified in the annotation? Is that what you  
16 are proposing?

17 MS. LOVERA: Whether the  
18 annotations are coming from FDA's listing,  
19 which for most fortification is --

20 MR. FELDMAN: So, you are asking  
21 for that?

22 MS. LOVERA: Right. As opposed to

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1 just a list of what can be used, the list has  
2 the annotation that says it can be used for  
3 these products that are supposed to be or  
4 qualify for fortification, and that infant  
5 formula seems to be a different list. So,  
6 let's have that as its own item to say we are  
7 tying it to this list from FDA; this is what  
8 is allowed.

9 MR. FELDMAN: Thank you.

10 CHAIR MIEDEMA: Colehour?

11 MR. BONDERA: So, you are here  
12 from Food and Water Watch, right?

13 MS. LOVERA: Yes.

14 MR. BONDERA: I cannot remember  
15 the name of the person who was up here a few  
16 days ago. And I was racking my brain to try  
17 to reformulate my question because I had to  
18 remember it because my question by her was  
19 postponed for when you were up here --

20 MS. LOVERA: Right.

21 MR. BONDERA: -- if I remember  
22 correctly.

1 Ahhhh.

2 (Laughter.)

3 So, my question specifically was  
4 about ocean and organic farmed fish, and I  
5 asked for, because she referred to the newest  
6 information or recommendations that your  
7 organization had on that topic, and she said  
8 that I should ask you that when you were here.  
9 And I think I have now asked you that, please.

10 MS. LOVERA: Okay. So, it was  
11 actually Tyler Shannon, who is a guy, but I  
12 won't tell him that. He's not here; he won't  
13 know.

14 So, he was delivering a memo that  
15 I think you all have now that we tried to  
16 compile what we have seen since 2008 about two  
17 main categories, escapes, environmental  
18 impact, what we have learned about open-net  
19 pens, and, then, also, what we have learned  
20 about wild fish as feed.

21 So, that has been distributed to  
22 you. It is fairly detailed. But, to

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1 summarize, the escapes piece is very -- we are  
2 kind of always adding to our list or our file  
3 of stories about escapes of farmed fish. And  
4 you know, it is all over the world; it is not  
5 one part of the world. It is Europe. It is  
6 South America. It is the Mediterranean.

7 And, then, in terms of the wild  
8 fish as feed, that is just a growing body of  
9 study about the contaminants and things. So,  
10 we tried to summarize some of those studies  
11 and put the cites in there.

12 CHAIR MIEDEMA: Thank you.

13 MS. LOVERA: Thank you.

14 CHAIR MIEDEMA: Alexis Randolph,  
15 you're up.

16 Zea Sonnabend is standing by.

17 Zea, are you here?

18 MS. SONNABEND: Yes.

19 CHAIR MIEDEMA: Okay.

20 MS. RANDOLPH: Good afternoon.

21 My name is Alexis Randolph, and my  
22 comments are on behalf of QAI, an organic

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1 certification agency.

2 QAI supports the Materials and  
3 Handling Committee's decision regarding the  
4 classification of materials to return to the  
5 2009 definition of chemical change. However,  
6 QAI feels that defining a significant level of  
7 a synthetic in the final material needs  
8 further thought. QAI would like clarification  
9 on what the final material refers to.

10 Yesterday the Committee discussed  
11 the definition of technical and functional  
12 effect, but QAI would still like further  
13 clarification of the technical and functional  
14 effect that the final material is, for  
15 example, on a 605(a) material or the finished  
16 product that the 605(a) material is going  
17 into.

18 This written recommendation seems  
19 to be implying the effect is on the material  
20 being reviewed, but discussion yesterday  
21 implied the finished organic product.

22 QAI would like to encourage the

1 Board to prioritize the development of a  
2 guidance document and to move the school  
3 recommendation forward for implementation.  
4 The Board as a whole has asked for input about  
5 the oversight of material review programs and  
6 has successfully identified the challenges of  
7 such an undertaking.

8 The expeditious publication of  
9 materials classification guidance to ensure  
10 this Board, certifiers, and material review  
11 institutes are being consistent when  
12 determining synthetic versus non-synthetic  
13 will be the first, and perhaps most important,  
14 step in attaining the larger goal of uniform  
15 and consistent material review.

16 Our comments regarding chlorine  
17 are addressed to both the Crops and Handling  
18 Committee. QAI supports the Handling  
19 Committee recommendation for chlorine in  
20 general, and we appreciate the Committee  
21 acknowledging in their discussion yesterday  
22 the critical change QAI feels need to be made

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1 in order to accommodate no-rinse sanitizers.

2 In addition to a potable rinse,  
3 there are other methods for ensuring residual  
4 chlorine is at or below the safe drinking  
5 water level of 4 milligrams per liter. These  
6 methods include, but are not limited to, a  
7 product purge, a rinse with another approved  
8 material on the National List, and testing for  
9 residual chlorine.

10 We recommend that the annotation  
11 be modified to require a potable rinse or  
12 other intervening event that is verified  
13 through testing.

14 QAI also supports the Crop  
15 Committee's recommendation and requests the  
16 annotation be amended to further clarify that  
17 chlorine listed on 205.601 applies to pre-  
18 harvest product contact only.

19 Furthermore, we would like to know  
20 -- sorry, three minutes is stressing me out  
21 (laughter) -- to implement either chlorine  
22 annotation successfully as a certifier, it is

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1 necessary to define when the scope of an  
2 operation changes from crops to handling.  
3 Many certifiers currently issue a crop  
4 certificate to operators who perform post-  
5 harvest on-farm washing of produce. Other  
6 certifiers, including QAI, define that  
7 activity as post-harvest handling.

8 We would like to know how much  
9 chlorine will be allowed for edible sprout  
10 production. Even though sprout seeds are  
11 discussed under Crop Section 205.204, in  
12 reality, most sprout production takes place in  
13 a processing facility or building located  
14 adjacent to a farm.

15 If the NOSB cannot address these  
16 conflicts of scope through annotation changes  
17 alone --

18 CHAIR MIEDEMA: Thank you.

19 MS. RANDOLPH: -- the QAI  
20 respectfully requests you work with the NOP to  
21 issue guidance that accompanies the National  
22 List.

1 CHAIR MIEDEMA: Thank you, Alexis.

2 MS. RANDOLPH: Thank you.

3 CHAIR MIEDEMA: Questions?

4 Katrina?

5 MS. HEINZE: Thank you for your  
6 comments on our classification recommendation.  
7 I could not agree with you more that we need  
8 to move forward with guidance.

9 So, my question to you is, or I  
10 guess a preface, the reason we brought the  
11 significant question to a vote is we needed  
12 Board direction on how to move forward. Do  
13 you have any opposition to us passing it as  
14 guidance, so that, then, we can move forward  
15 to get the rest of the guidance completed?

16 MS. RANDOLPH: I don't have any  
17 opposition if the guidance documents give  
18 clear examples of types of materials where the  
19 technical and functional effect are applying  
20 to either the material being reviewed or the  
21 final organic product being created that uses  
22 that material.

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1 MS. HEINZE: I will write it down  
2 right now.

3 MS. RANDOLPH: Okay.

4 CHAIR MIEDEMA: Any other  
5 questions? Jay and, then, Steve.

6 MR. FELDMAN: Thank you for your  
7 comments.

8 I am trying to get a handle on the  
9 scope issue that you mentioned with chlorine.

10 MS. RANDOLPH: Yes.

11 MR. FELDMAN: So, if you could  
12 help me with that, I would appreciate it. So,  
13 you are saying that any post-harvest handling  
14 in the field is considered handling in your  
15 world? Is that field? Because, as you know,  
16 a lot of processing is happening in the field,  
17 right? So, there is the pre-harvest that you  
18 said the Crops Committee recommendation should  
19 apply to. What kind of language would you --

20 CHAIR MIEDEMA: Jay, please repeat  
21 your question for the record.

22 MR. FELDMAN: Yes. Okay. Sorry.

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1                   You have distinguished between  
2 pre-harvest and post-harvest.

3                   MS. RANDOLPH: Yes.

4                   MR. FELDMAN: If you could just  
5 help explain that for me one more time?

6                   MS. RANDOLPH: Sure. The majority  
7 of post-harvest activity that we see at the  
8 farm is actually adjacent to the field in a  
9 shed-type environment, not necessarily always  
10 a shed, but also, you know, a more  
11 sophisticated facility environment, where they  
12 are washing produce and applying, obviously,  
13 chlorine into the wash water.

14                   Some certifiers certify that  
15 entire activity at that location as crops, and  
16 QAI would certify that as two separate  
17 certifications, the second one being post-  
18 harvest handling as a handling standard. And  
19 therefore, in that scenario the chlorine could  
20 be used according to the new annotation at any  
21 level, provided there is a potable rinse.

22                   MR. FELDMAN: Is that common? I

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1 am just trying to get a sense of whether that  
2 is industry-wide. Are you an exception? Or  
3 are you the rule? How does it break out among  
4 the certifiers? Do you know?

5 MS. RANDOLPH: I don't know --

6 CHAIR MIEDEMA: Thank you.

7 MS. RANDOLPH: -- the percentages,  
8 you know.

9 CHAIR MIEDEMA: Thanks. No  
10 problem.

11 Miles has a --

12 MR. McEVOY: A point of  
13 clarification from the program. This came up  
14 during the ACA training in Portland this year  
15 as an area where certifiers are looking at  
16 post-harvest in different ways. The rule is  
17 not clear in this particular area. So, you  
18 have post-harvest materials like floatation  
19 agents like sulfonate and sodium silicate that  
20 are under the 601, and, then, most of the rest  
21 of the handling materials are under 605.

22 So, this is an area that the

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1 program is working on providing clarification  
2 to the certifiers and the organic community,  
3 so that we are all on the same page. We  
4 realize there are some distinctions. The  
5 standards are still being met. It is just  
6 that, where do you draw the line; what do you  
7 call post-harvest handling?

8 MS. RANDOLPH: Can I just respond  
9 to that really quickly?

10 We recognize that not all  
11 materials are up for review at this time, and  
12 therefore, not all materials would be getting  
13 an annotation change. For example,  
14 diatomaceous earth is another example of a  
15 crop material that is allowed for pesticide  
16 application in the crop environment, but not  
17 once the grain moves to the post-harvest, to  
18 the facility processing.

19 So, we just thought at this time  
20 chlorine is an opportunity to clarify the  
21 annotation, but if it is more appropriate to  
22 allow the program to make that clarification

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1 on a larger scale, then we are fine with that  
2 as well.

3 CHAIR MIEDEMA: Okay. Thank you.

4 Jay, did that answer your  
5 question, from the program?

6 MR. FELDMAN: I have a question  
7 for the program.

8 CHAIR MIEDEMA: Okay.

9 MR. FELDMAN: Yes, just quickly,  
10 so in terms of the recommendation coming out  
11 of the Crops Committee, Miles, what would that  
12 apply to, the recommendation that is  
13 currently? Because, as you know, as John  
14 described yesterday, the recommendations  
15 coming out of Handling and Crops are slightly  
16 different. So, I was wondering what the Crops  
17 Committee recommendation would apply to as you  
18 are thinking about the rule.

19 MR. McEVOY: Well, we will be  
20 providing clarification on this in the final  
21 guidance that will be out shortly. So, I  
22 would say we will take the recommendation from

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1 the Crops and Handling Committee about  
2 chlorine into account for providing  
3 clarification.

4 CHAIR MIEDEMA: Thank you.

5 MR. McEVOY: That didn't really  
6 make any sense, did it?

7 CHAIR MIEDEMA: It sounds like it  
8 is to be determined.

9 Okay. Thank you very much.

10 Zea Sonnabend is up next, and  
11 Susan Cheney is standing by.

12 MS. SONNABEND: Good afternoon.

13 I am Zea Sonnabend, Policy  
14 Specialist and Organic Inspector for CCOF.

15 From 1994 to 1996, I was the  
16 original contractor for the TAP reviews. So,  
17 I can try to help if there is any questions  
18 that arise from some of those very old TAP  
19 reviews.

20 Since 1993, I have been standing  
21 here commenting to this Board about the need  
22 for thorough and scientifically-based

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1 materials review. To that end, we are very  
2 grateful to see the materials classification  
3 document finally coming to fruition, and we do  
4 support the language that is now proposed and  
5 hope you can get it through this meeting  
6 because it will affect the whole certifier  
7 community every day in making decisions for  
8 materials.

9 It is also particularly important  
10 that you have good review in considering  
11 changes in the Sunset process because your own  
12 Board Procedures Manual requires you to  
13 consider the force of evidence of new  
14 information that would contribute to any  
15 change in Sunset. If you can't get a current  
16 technical review on time, then please respect  
17 the deliberations of the previous NOSB members  
18 who heard lots and lots of public comment and  
19 deliberated long and hard, not all of which is  
20 captured in the transcripts of that time.

21 That being said, I want to point  
22 out some flaws in the existing crops

1 recommendations. The one for magnesium  
2 sulfate has no technical report, no reasons or  
3 evidence, or no assessment of commercial  
4 availability for non-synthetic sources.

5 The pheromones one has a change of  
6 annotation that is seriously flawed because  
7 the passive dispenser language is currently in  
8 the inert section, and limiting passive to  
9 language for all inerts would thwart a lot of  
10 new technologies with low environmental  
11 footprint and apply a more strict standard to  
12 pheromones than anything else on the list,  
13 while pheromones are one of the safest  
14 materials on the list. Please work with  
15 inerts through the Inerts Working Group and  
16 not through the pheromone annotation.

17 In doing a thorough review, it is  
18 important for you each to be critical thinkers  
19 when it comes to looking at the information  
20 presented to you, and be aware that not all  
21 statements made by everyone are supported by  
22 evidence that backs them up.

1           The TAP reviews should be read  
2 carefully for what they say and what they do  
3 not say. If I had been able to see the  
4 technical report for tetracycline and  
5 streptomycin before the written comment  
6 period, I would have liked to challenge  
7 several assertions that have been made to the  
8 Board in there, but it was not posted on time  
9 for me to incorporate it into my written  
10 comments.

11           And I have three particular things  
12 that I would like to challenge, which if I run  
13 out of time, you can ask me afterwards. Other  
14 people got the benefit of seeing it ahead of  
15 time, and I did not.

16           For instance, the statement that  
17 antibiotic use in pears and apples has been  
18 linked to human pathogen resistance is not a  
19 statement outright made in the technical  
20 report. And I will go back and read the  
21 paragraph to you later. It does specifically  
22 say that, while we can surmise that this

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1 lateral transfer of resistance could occur,  
2 the link between human pathogen resistance and  
3 antibiotic use in apples and pears has not yet  
4 --

5 CHAIR MIEDEMA: Thank you.

6 MS. SONNABEND: -- been made.

7 CHAIR MIEDEMA: Thank you.

8 Any questions for Zea? Tina?

9 MS. ELLOR: Would you be willing  
10 to share the other two with us, please?

11 (Laughter.)

12 MS. SONNABEND: Yes. Thank you.

13 I have one sentence on that one.  
14 In the technical review, the EPA said they  
15 will be reviewing this very issue, with their  
16 review due to come in 2014. And so, I think  
17 you should consider that if you consider a  
18 compromise proposal to keep it going for a  
19 short period of time.

20 Secondly, the assertion that  
21 tetracycline can be taken up by apples and  
22 found in the peel and core is not correct.

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1 The research was done for streptomycin which  
2 could be taken up by apples, and it could be  
3 present in the core at .0019 parts per  
4 million.

5 But if you look at the technical  
6 review carefully, you will see that the  
7 tetracycline and the streptomycin behave very  
8 differently in the environment. The  
9 tetracycline gets into the soil and is bound  
10 to the soil particles and is not that likely  
11 to move. Yet, it degrades very quickly in the  
12 sunlight. Plus, it is only applied at bloom  
13 and is not present in the fruit.

14 So, this would lead us to think  
15 that it stays in the soil and is not going to  
16 be taken up by the trunk as fast. Yet, it  
17 degrades in the light. And so, it is not  
18 going to remain on the twigs and blossoms by  
19 the time the fruit is set.

20 The streptomycin, on the other  
21 hand, when it hits the soil, is fairly mobile,  
22 and they have shown residues taken up by

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1 vegetables. And that is new research since  
2 the last Sunset review of the material. And,  
3 yet, it can be sprayed once the fruit is on  
4 the tree post-infection, and therefore, it has  
5 a much higher likelihood of being taken up by  
6 the fruit. And you would have to determine  
7 whether that level is relevant to your  
8 deliberations for resistance.

9           The third point, the assertion  
10 about resistance transfer in genes. I read  
11 that paper that was cited a little while ago.  
12 And while the concerns or information are  
13 valid in hospital settings and population  
14 settings where there is this horizontal  
15 transfer happening all the time, and in nature  
16 we cannot deny that such things are possible,  
17 in actual practice, from that article it looks  
18 to me like a sick person would have to go into  
19 an orchard that had been sprayed with the  
20 tetracycline and either ingest the soil or the  
21 blooms repeatedly for the resistance factor to  
22 transfer to humans.

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1           The resistance factor is very high  
2           to the fire blight organization, which is what  
3           is present in the field and what is being  
4           targeted repeatedly, and so will have all of  
5           that gene interaction that was discussed in  
6           the article. But we are not there yet in  
7           proving that it actually happens to transfer  
8           to human pathogens.

9           CHAIR MIEDEMA: Thank you.

10           Lisa, what are we at right now on  
11           our count? Okay.

12           Quick, please.

13           MS. SONNABEND: I know people  
14           wanted to ask about pheromone technologies.

15           CHAIR MIEDEMA: Yes, make it  
16           brief, please.

17           MR. MARAVELL: You mentioned that  
18           the language with regard to passive pheromone  
19           dispensers could thwart new technology. Could  
20           you expand on that and say what the new  
21           technology is?

22           MS. SONNABEND: Okay. There are

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1 three relatively-new technologies I am aware  
2 of. The first one is material that is like a  
3 putty or a paste that is designed to be  
4 applied to the tree trunks and/or phone poles,  
5 or anything else, and is impregnated with  
6 pheromones. That material is not designed to  
7 be removed from the field. It is actually a  
8 clay-based sort of material that will fall off  
9 the trunk as it degrades and break down into  
10 clay.

11 At our insistence, because they  
12 were going to use it in our emergency spray  
13 situation for the light brown apple moth, they  
14 reformulated the product to have only List 4  
15 inerts in it. So, it doesn't even need this  
16 whole List 3 exemption thing. But under your  
17 proposed annotation, that would be prohibited  
18 because you cannot really define that as  
19 passive. The definition of passive is  
20 unclear.

21 Second, puffers. Puffers are  
22 things that are in the field, a few per acre.

1 They emit little puffs of pheromone. Over the  
2 course of a season, they actually use less  
3 pheromone and, therefore, less inert  
4 ingredients than the twist ties do.

5 They have been reformulated. So,  
6 some brands are available that are only List  
7 4. Unclear whether that is passive because it  
8 does push it out, but, then, it does  
9 volatilize.

10 And the third one is a product.  
11 It is called microflake, disruption  
12 microflake. And it is a laminated polymer  
13 sandwich or flake that is about one-eighth-  
14 inch square with the pheromone between two  
15 layers of inert polymer that they say  
16 biodegrades.

17 We have not approved, let me say  
18 that we have not approved this for use in  
19 organic farming, because the question of what  
20 it biodegrades into is completely unclear, and  
21 it does not include any List 3. It is only  
22 List 4's. But it is in this polymer matrix

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1 that is very unclear where that falls in the  
2 organic regulation.

3 CHAIR MIEDEMA: Thank you.

4 MS. SONNABEND: So, we have not  
5 approved it.

6 CHAIR MIEDEMA: Thank you very  
7 much.

8 We really do need to keep moving  
9 out of fairness of everyone that is signed up  
10 today.

11 MR. FELDMAN: Can't she get a few  
12 minutes for every year of service to the  
13 organic community?

14 (Laughter.)

15 CHAIR MIEDEMA: We would be here a  
16 lot of minutes today.

17 (Laughter.)

18 Susan Cheney is up next. Andrew  
19 Wilcox is standing by.

20 MS. CHENEY: Hello. Susan Cheney  
21 with Martek Biosciences.

22 Martek supports the continued use

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1 of vitamins, minerals, and accessory nutrients  
2 in organic foods, and we appreciate the work  
3 the Handling Committee is doing to fully  
4 evaluate the information and comments that  
5 have been provided on this topic, so that they  
6 can develop an annotation that takes into  
7 account the 1995 Board recommendation and  
8 continue to protect the integrity of organics.

9           Based on the Board's discussions,  
10 and particularly some of the comments, it is  
11 apparent that the fortification annotation  
12 question involves many different viewpoints  
13 and opinions. We have supported the original  
14 Committee recommendation to replace the flawed  
15 annotation with one that tracks the FDA's  
16 approach on fortification, and we have also  
17 supported the postponement until the fall to  
18 allow the Committee to fully review the record  
19 on that proposal.

20           Yesterday's suggestion to sunset  
21 the flawed annotation by not voting it in  
22 again, but to leave the category of vitamins

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1 and minerals intact and add new annotation  
2 language in the fall, appears to be a good  
3 compromise. The NOP's clarification of how  
4 that would work seems to be reasonable and  
5 acceptable as well.

6 Separate from the fortification  
7 question, several erroneous statements have  
8 been made about Martek's DHA and ARA,  
9 materials that were petitioned last summer and  
10 will be reviewed at the fall NOSB meeting.  
11 Let me give you a quick statement of the  
12 facts.

13 DHA and ARA are safe. They have  
14 been evaluated for more than 15 years in over  
15 200 preclinical and human clinical studies,  
16 including studies with infants.

17 FDA and regulatory agencies  
18 worldwide have reviewed the safety of our  
19 products on numerous occasions, and all have  
20 agreed that these ingredients are safe for use  
21 in infant formula, foods, beverages, and  
22 supplements.

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1                   Our DHA and ARA are products of  
2                   fermentation, a natural biological process  
3                   which provides a non-genetically-modified,  
4                   sustainable vegetarian and allergen-free  
5                   source of DHA and ARA.

6                   Lastly, the health benefits of our  
7                   materials is continually being recognized on  
8                   a global basis, as is evidenced by the  
9                   European Parliament approving a visual  
10                  development claim for DHA earlier this month,  
11                  and the European Food Safety Authority  
12                  recommending several health and nutrient  
13                  content claims relating to DHA last fall.

14                  We look forward to working with  
15                  you during our petition review and trusting  
16                  your ability to separate fact from fiction and  
17                  complete a fair and objective review of our  
18                  materials over the next few months.

19                  Thank you.

20                  CHAIR MIEDEMA: Any questions?  
21                  Steve and, then, Jay. Anyone else? Okay. Go  
22                  ahead.



1 MR. DeMURI: Are you aware of any  
2 studies or data regarding allergic reactions  
3 to your ARA or DHA?

4 MS. CHENEY: Completely unaware of  
5 any.

6 CHAIR MIEDEMA: Jay?

7 MR. FELDMAN: So, just to be  
8 clear, you are good with subjecting your  
9 products to full review outside of the  
10 mineral, nutrients, and supplement category?  
11 Or I always get it wrong. Vitamin, mineral,  
12 and nutrients, is that right? Close enough.

13 MS. CHENEY: I understand.

14 We are. Based on the meeting last  
15 April, it was very clear that these materials  
16 would have to be petitioned. We left the  
17 meeting -- I'm sorry. What did I say?

18 Okay. Yes, we are.

19 MR. FELDMAN: Okay. Thank you.  
20 Thank you. Thank you.

21 CHAIR MIEDEMA: Thank you very  
22 much.

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1 MS. CHENEY: Thank you.

2 CHAIR MIEDEMA: Andrew Wilcox is  
3 up next. Beth Robinette is standing by.

4 MR. WILCOX: Hi. My name is Andy  
5 Wilcox. I am an egg farmer from Roy,  
6 Washington, approximately 60 miles south of  
7 here.

8 We support the new livestock  
9 standards for egg layers. Since 2005, we have  
10 been letting our birds go outside. We really  
11 haven't seen any issues.

12 We understand there is more risk  
13 as far as disease, and it is tougher for  
14 biosecurity, but we have put that into our  
15 cost of production and done as much measures  
16 as we can to prevent those types of issues.

17 The only area, we have started  
18 building our buildings at the five square foot  
19 per thousand. And actually, the cooler  
20 weather and the cooler temperatures haven't  
21 been a problem. The toughest with that square  
22 foot is the higher temperatures. When you are

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1 at 85 or 90 degrees, the ventilation systems  
2 that you are trying to design, it is really  
3 tough when you have that much opening space.  
4 So, it has been very viable, except for at  
5 those really upper temperatures above 85  
6 degrees.

7 The one area we do have a concern  
8 on the standards is the pullets. We  
9 vaccinate, like others, at between 12 and 14  
10 weeks. And what we have seen, and I  
11 understand the reasoning is that you are  
12 encouraging the birds to go outside if they  
13 are pullets and such, what we have seen is, as  
14 long as we are getting the birds outside  
15 between 20 and 25 weeks of age, they are  
16 learning; it takes about two to three weeks.  
17 The birds learn to go outside, and they are  
18 fully utilizing the paddocks or the outside  
19 access.

20 That's it.

21 CHAIR MIEDEMA: Thank you very  
22 much.

1                   Any questions for Mr. Wilcox?  
2 Wendy?

3                   MS. FULWIDER: What age would you  
4 support sending birds outdoors?

5                   MR. WILCOX: At 24 weeks. Like I  
6 said, between 20 and 25 weeks is what we  
7 practice on our farm.

8                   CHAIR MIEDEMA: Mac?

9                   MR. STONE: Is it NPIP that kind  
10 of regulates some of the vaccine schedules or  
11 some other agency or group?

12                  MR. WILCOX: Generally, there is  
13 not necessarily an agency. We just utilize  
14 the advice of our veterinarians. And you  
15 know, there are certain ages. You have  
16 multiple vaccines that you have to utilize.  
17 And so, we are just going off the advice of  
18 our veterinarian at those ages.

19                  CHAIR MIEDEMA: Thank you.

20                  Beth Robinette is up next. Howard  
21 Koozer is standing by.

22                  MS. BETH ROBINETTE: My name is

1 Beth Robinette, and I am a fourth-generation  
2 cattle rancher.

3 I am here today to ask you to  
4 stand in solidarity with farmers and ranchers  
5 who face the imminent threat that GMOs face to  
6 producers.

7 As a young person in agriculture,  
8 the proliferation of the organic standard has  
9 been a beacon of hope. It has convinced me  
10 that an ever-growing segment of consumers is  
11 seeking food that is grown in a way that is  
12 respectful to the earth. I want nothing more  
13 than to produce wholesome food for my  
14 community and be a steward of my land.

15 Everything we do on our ranch is  
16 with an eye toward transparency and the health  
17 of our animals, the earth, and our customers.  
18 But the threat of GMOs could bring all that  
19 crashing down.

20 As I am sure most of you are  
21 aware, the scientific testing of the  
22 environmental and human safety of GMOs has

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1       been anything but rigorous, not to mention the  
2       food security threat that is inevitable when  
3       a small handful of corporations own the  
4       intellectual property contained within the  
5       majority of food grown in this country.

6               Many of my customers buy our beef  
7       because I can guarantee them that our animals  
8       never consume any genetically-modified  
9       organisms. With the release of Roundup Ready  
10      alfalfa, it will be extremely difficult to  
11      guarantee that to my customers any longer. At  
12      some point, the risk of contamination will  
13      become inevitable.

14             Our ranch has recently begun the  
15      process of organic certification as a way to  
16      communicate to our customers that our beef is  
17      raised according to certain standards of  
18      animal and human well-being. Being GMO-free  
19      is a large part of that.

20             Soon I fear I will have to face my  
21      customers in the spirit of transparency and  
22      confess to them that we can no longer provide

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1       them with food that I can morally stand behind  
2       100 percent.

3               As others have stated before me,  
4       and I am sure as many will hereafter, co-  
5       existence with GMOs is not possible. There is  
6       no way for me to prevent GMOs from  
7       contaminating my fields. If nothing is done,  
8       then very soon no farmer or rancher who grows  
9       alfalfa can make a claim that their crops are  
10      GMO-free.

11              In an effort to protect organic  
12      producers, the NOSB has stated that GMOs will  
13      be allowed in organic food as long as they are  
14      the result of contamination and not  
15      intentional introduction. This erodes the  
16      meaning of the word "organic".

17              If no one stands up to the  
18      corporations that release these biological  
19      weapons of capital domination into the  
20      environment, eventually, the contamination  
21      will become so prevalent that consumers can no  
22      longer trust the organic label.

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1                   That is why I am asking the Board  
2                   to craft a letter to Secretary Vilsack and  
3                   President Obama asking that the decision on  
4                   Roundup Ready alfalfa be rescinded.

5                   I also ask that the Board support  
6                   the labeling of any products that contain  
7                   GMOs, whether they be conventional or organic.  
8                   Farmers and ranchers have been robbed of their  
9                   choice to decide whether or not they will grow  
10                  GMOs on their land. Don't allow the same fate  
11                  to fall on consumers.

12                  (Applause.)

13                  CHAIR MIEDEMA: Thank you very  
14                  much, Ms. Robinette.

15                  Any questions? Jay Feldman?

16                  MR. FELDMAN: Do you grow alfalfa?

17                  MS. BETH ROBINETTE: Yes. We  
18                  don't sell hay. We just grow a small amount  
19                  of hay, and, obviously, our cattle graze on  
20                  pasture. We do grass-fed beef.

21                  MR. FELDMAN: How do you do that  
22                  without GMO alfalfa?



1 MS. BETH ROBINETTE: Well, it is a  
2 little-known fact that over 90 percent of the  
3 alfalfa grown in this country does not require  
4 any pesticides to be grown.

5 MR. FELDMAN: I knew that. Thank  
6 you.

7 (Laughter.)

8 CHAIR MIEDEMA: Any other  
9 questions?

10 MS. BETH ROBINETTE: Can I quickly  
11 mention that former Board Member Jennifer Hall  
12 has already stated that she would gladly  
13 support such a letter and would sign it.

14 CHAIR MIEDEMA: Thank you.

15 Howard Koozer is up next.  
16 Elizabeth Fry is standing by.

17 MR. KOOZER: Good afternoon.

18 I am Howard Koozer. I have a  
19 moderate-sized organic chicken egg farm a  
20 little ways north of here.

21 The issue we have is with regard  
22 to the guidelines requiring the pullets to

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1 have outdoor access. And there are three  
2 primary reasons.

3 One, the first reason, which  
4 really was the first one to come to mind when  
5 we were designing our layout, is that one of  
6 the big challenges is to get the body weights  
7 of the bird to the target weight for beginning  
8 of lay by the time, the age they need to be  
9 transferred.

10 So, in order to keep them from  
11 going into lay too early, they developed, they  
12 are utilizing a natural part of the chicken's  
13 repertoire in the wild, and when the birds  
14 grow up during the fall when the day length is  
15 decreasing. When they become adults, they  
16 don't start laying eggs for reproduction  
17 because they can't successfully produce brood.

18 So, we utilize that part of their  
19 genetic repertoire to keep them from going  
20 into lay while their body weight is too low.  
21 You decrease the amount of light they have  
22 incrementally, so that they think that it is

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1 fall. And so, they don't start laying eggs  
2 before their bodies are mature enough to  
3 support it successfully.

4 Then, the next reason that is  
5 quite important is the vaccination program is  
6 not complete. In our program, the last  
7 vaccination takes place at 14 weeks of age,  
8 and it takes a few weeks for the immune system  
9 to fully respond to each vaccination.

10 Some of the vaccinations are  
11 incremental. There is one of them that is  
12 done in three steps, and the last one is  
13 combined with one that is just a single.

14 So, to put them outside when their  
15 immunity is immature is risky to the welfare  
16 of the bird as well the welfare of the farmer,  
17 who has got a large investment in them.

18 So, the population-at-large is  
19 more concerned with the welfare of the bird,  
20 and it is no less the concern of the producer.  
21 However, he also has to be worried about  
22 staying in business.

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1 CHAIR MIEDEMA: Thank you very  
2 much.

3 MR. KOOZER: Any questions?

4 CHAIR MIEDEMA: Wendy?

5 MS. FULWIDER: So, what age do you  
6 support outdoor access?

7 MR. KOOZER: We put our birds into  
8 the adult production rooms at the age of 18  
9 weeks. And at that point, they have access to  
10 the outdoors, weather permitting.

11 The birds that are put out into  
12 these lay barns, at that point in time, take  
13 about a week to learn go out. Significant  
14 numbers of the birds are going out in one  
15 week.

16 CHAIR MIEDEMA: Mac?

17 MR. KOOZER: And as far as nest  
18 training, the only thing that is necessary is  
19 just wait until early afternoon, after they  
20 are done laying, open the doors, and they are  
21 okay. So, that is not an argument.

22 CHAIR MIEDEMA: Mac?

1                   MR. STONE: What season do you and  
2 other pullet producers shoot for? Or is there  
3 a year-round pullet production? What is the  
4 seasonality of your all's operation?

5                   MR. KOOZER: In my operation, we  
6 have six production clocks, and they are in  
7 10-week age steps. So, every 10 weeks, we get  
8 a group of babies. Then, after 10 weeks, they  
9 get moved from the brooder rooms to the pullet  
10 rooms. And, then, in another nine to ten  
11 weeks, we put them into the production rooms.  
12 So, it is continuous all year long.

13                  MR. STONE: So, that is why the  
14 light management is critical to --

15                  MR. KOOZER: Yes.

16                  MR. STONE: -- development at  
17 those various stages --

18                  MR. KOOZER: Right.

19                  MR. STONE: -- depending on the  
20 time of year?

21                  MR. KOOZER: And so, letting them  
22 out with the light pattern makes it very

1 difficult.

2 CHAIR MIEDEMA: Thank you.

3 Any other questions?

4 (No response.)

5 All right.

6 MR. KOOZER: Thank you.

7 CHAIR MIEDEMA: Elizabeth Fry,  
8 you're up next. Cathy Franck is standing by.

9 MS. FRY: Logistics. There we  
10 are.

11 I am Liz Fry. I am the Whole  
12 Foods Market Quality Standards Coordinator for  
13 Animal Products. I have been working on  
14 animal welfare standards for almost nine  
15 years.

16 In the preamble to the proposed  
17 animal welfare standards, it states that you  
18 seek to make these standards the gold  
19 standard. Whole Foods Market agrees with this  
20 goal. The incredible amount of work that the  
21 Livestock Committee has done is a huge step in  
22 this direction.

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1           From listening to our shoppers who  
2           are looking for the best food for their  
3           families, we know the prevalent belief is that  
4           organic certification is already the gold  
5           standard when it comes to animal welfare.

6           We believe that the standards  
7           should coincide with consumer expectations.  
8           Especially with emerging transparency into  
9           animal production systems, it is essential  
10          that the national organic standards truly  
11          impact the welfare of farm animals.

12          Whole Foods Market has recently  
13          launched the Global Animal Partnership Five-  
14          Step Animal Welfare Rating, which is an animal  
15          welfare program that rates farms according to  
16          welfare practices to six different levels.

17          With the level of transparency  
18          this program provides, the customers'  
19          assumptions about animal welfare practices  
20          will be supported or not. This is the first,  
21          but judging from the enthusiastic consumer  
22          response, will not be the last program of its

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1 type.

2 The most frequently-asked question  
3 in the area where we have had this program  
4 rolled out the longest is, why is the organic  
5 chicken in these particular stores only a Step  
6 Two? And our answer to that up to this point  
7 has been because the organic standards are  
8 looking at inputs and surroundings rather than  
9 animal welfare; these standards focus  
10 specifically on animal welfare.

11 We believe that the current  
12 proposed standards are too general. Laying  
13 hens and broilers have different welfare  
14 needs. Under the proposed standards, beef  
15 cattle welfare is addressed by the same  
16 standards as dairy cattle, but the two types  
17 of cattle are raised in very different  
18 environments and have very different welfare  
19 issues and different needs.

20 There are different types of  
21 animal production that should be included in  
22 the standards. Each of these types of

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1 production should be identified with different  
2 standards that will provide transparency to  
3 the consumer.

4 On Tuesday, we heard Matt O'Hare  
5 point out that two square feet of outdoor  
6 space is insufficient for laying hens on  
7 pasture. Two square feet is appropriate for  
8 outdoor access from an indoor system. But,  
9 yet, there are no standards for what a pasture  
10 system should look like.

11 We heard Ashley Swaffar talk about  
12 the problem that transport time limits don't  
13 pertain to poultry, and they don't even  
14 pertain to, you know, they are not exactly  
15 right for all the mammals. Twelve hours is  
16 not right for everybody.

17 Different types of production  
18 require different standards. Different  
19 species require different standards. And the  
20 same species bred for different purposes  
21 require different standards.

22 CHAIR MIEDEMA: Thank you.

1 MS. FRY: These complexities need  
2 to be considered in the developing standards  
3 for animal welfare, so they are clear and so  
4 there are not more loopholes created by  
5 lumping very different animals and situation  
6 into the same overarching set of principles.

7 CHAIR MIEDEMA: Thank you, Liz.

8 Any questions? We will start with  
9 Nick, and, then, Jay.

10 MR. MARAVELL: I have seen the  
11 Whole Foods stratification on animal welfare,  
12 but I don't recall, do you manage to do what  
13 you are asking us to do, which is to look at  
14 species-by-species type of production and,  
15 then, final product? You are able to sort  
16 that through and make different standards, if  
17 you will, or different criteria for the  
18 different classifications?

19 MS. FRY: Yes, the different step  
20 levels are focused on different types of  
21 production systems, and there is a set of  
22 standards. Right now, the Global Animal

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1 Partnership, they are not Whole Foods  
2 standards. Global Animal Partnership  
3 standards are finished for three species, and  
4 they are working on standards for other  
5 species, but, yes, essentially.

6 CHAIR MIEDEMA: Jay?

7 MR. FELDMAN: I think my question  
8 was the same. I am trying to get at how you  
9 operationalize the standards in your buying  
10 practices, which is I think a similar  
11 question, so that you are adhering to these  
12 global standards, these global international  
13 standards, and you are applying those to your  
14 purchasing decisions when you go out and  
15 source the product. You are currently  
16 applying those standards?

17 MS. FRY: Currently applying the  
18 standards for beef, chicken, and pork because  
19 those are the only ones finished.

20 MR. FELDMAN: And are you having  
21 trouble applying those standards?

22 MS. FRY: What Whole Foods did was

1 they asked all of the current producers to  
2 become certified to the Global Animal  
3 Partnership Program. They gave them a year of  
4 lead time.

5 And the producers have stepped up  
6 to the plate. There was a little bit of  
7 resistance initially because of cost. I have  
8 heard a lot of concerns about cost. There  
9 have been concerns that we would lose  
10 producers. I have heard that concern voiced,  
11 too.

12 But what we have found is that the  
13 producers step up to the plate. The producers  
14 have been much more innovative than we  
15 expected, and they have come up with novel  
16 ways of producing animals. They have changed  
17 their practices, and it has been quite  
18 effective.

19 CHAIR MIEDEMA: Thank you.

20 Cathy Franck, you're up. Steven  
21 Moore is standing by.

22 MS. FRANCK: Hi. My name is Cathy

1 Franck, and I sell real estate for my  
2 livelihood, but I try to eat daily and I am  
3 very concerned about our nation's food supply,  
4 so concerned I have created a consumer-  
5 oriented project called the Real Food Watch  
6 Club Biodiversity Project.

7 I have owned a farm, but was so  
8 busy with work, I didn't farm that  
9 extensively.

10 The Real Food Watch Club's main  
11 concern is GMOs that reproduce or in some way  
12 spread their DNA in the open environment. The  
13 only federal GMO-free label we have in this  
14 country is the USDA certified organic label.

15 You all have an awesome task, and  
16 this a complex puzzle. My hope is that you  
17 keep the program logical for the farmers, so  
18 they do not get frustrated or discouraged with  
19 the program.

20 We consumers want to see more  
21 organic labels, not fewer. When you remove or  
22 restrict an existing material, tool, or

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1 practice method from the program, for that one  
2 farmer you find whose livelihood depends on  
3 that material or practice usage, can he or she  
4 be grandfathered in to continue that practice  
5 until he or she is able to successfully  
6 replace that practice with an alternate  
7 acceptable method or material?

8 Is there a way that you can  
9 educate him or her in alternate methods? And  
10 is there a way you can look to the European or  
11 even Canadian models for guidance, if you have  
12 a need to change the program?

13 From a consumer choice standpoint,  
14 I recommend keep it simple. Advanced organic  
15 buyers understand the range of farming  
16 philosophies, but, in general, parents want  
17 healthy food for their kids; people want  
18 healthy food for themselves and loved ones.

19 The target market should be huge.  
20 Keep the consumers in mind. We want organic  
21 and more of it. Though we are very educated  
22 in label reading, we are still at our core

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1 simple people and gratefully buy organic for  
2 simple reasons. No synthetic pesticides,  
3 herbicides, and fungicides, and we understand  
4 that there are limited exceptions. No sewage  
5 sludge. No irradiation, and no GMOs.

6 Thank you all for your work in  
7 protecting this label, keeping it simple for  
8 the farmers who, for whatever reason, choose  
9 to produce such healthy food and carrying the  
10 torch forward this label, so we can eat food  
11 with genetic makeup as Nature created and  
12 intended.

13 CHAIR MIEDEMA: Thank you very  
14 much.

15 Steve?

16 MR. DeMURI: So, from a consumer  
17 standpoint, would you support mandated GMO  
18 testing of organic products?

19 MS. FRANCK: That is a question I  
20 haven't really totally thought through. I  
21 will get back with you on an answer for that.

22 CHAIR MIEDEMA: Fair enough.

1 Nick?

2 MR. MARAVELL: From the consumer  
3 standpoint, you said that keep it simple, no  
4 synthetics, but with limited exceptions. How  
5 do you feel that is understood by the  
6 consumers that are buying organic products?  
7 Do you think that is how they view it, no  
8 synthetics, but limited exceptions? How well-  
9 known is that, I guess is what I am getting  
10 at. Just your opinion.

11 MS. FRANCK: Well, I can only  
12 speak for myself and people I talk to, but we  
13 understand there are exceptions.

14 CHAIR MIEDEMA: Thank you.

15 John Foster?

16 MR. FOSTER: Hi. You had kind of  
17 used air quotes there --

18 MS. FRANCK: Yes, yes.

19 MR. FOSTER: -- earlier, early on,  
20 where I believe you quoted GMO-free. And so,  
21 I wonder if you could clarify what the air  
22 quotes meant specifically.

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1 MS. FRANCK: On that, it is just  
2 that is what I had in my paper. Okay? I just  
3 had that written down.

4 (Laughter.)

5 MR. FOSTER: Okay. So, that was --  
6 okay.

7 MS. FRANCK: So, it didn't mean --

8 MR. FOSTER: Okay.

9 MS. FRANCK: -- but it could. But  
10 it could.

11 (Laughter.)

12 MR. FOSTER: Right. I guess maybe  
13 I was reading too much into it, then, because  
14 that is a hard term, as you obviously know.

15 MS. FRANCK: We understand, well,  
16 I understand there is an issue, yes, but it  
17 wasn't for that. Yes.

18 CHAIR MIEDEMA: Thank you.

19 Steven Moore, you're up next. Is  
20 Steven Moore in the audience?

21 (No response.)

22 No? Okay.

1 Gwendolyn Wyard, you are up next.

2 Eli Penberthy is standing by.

3 Go ahead, Gwendolyn.

4 MS. WYARD: All right. Good  
5 afternoon.

6 My name is Gwendolyn Wyard. I am  
7 the Associate Director of Organic Standards  
8 with the Organic Trade Association. I also  
9 co-chaired the Materials Working Group with  
10 Kim Dietz.

11 OTA's complete and detailed  
12 comments were submitted in writing. Today I  
13 will highlight several points on multiple  
14 topics.

15 OTA supports the recommended  
16 definition of chemical change, and we support  
17 separate guidance documents for crop,  
18 livestock, and handling.

19 In regards to significant and  
20 insignificant, we support the direction of the  
21 majority to base allowable levels on  
22 applicable regulatory limits and the lack of

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1 a technical or functional effect in the final  
2 product. This was the language originally  
3 recommended by the 2005 NOSB. It was  
4 incorporated into the 2006 NOP framework  
5 document and, then, supported by the Material  
6 Working Group in their 2009 presentation.

7           OTA requests the NOSB pass the  
8 recommendation and, then, provide further  
9 guidance by detailing the applicable  
10 regulatory agencies and examples of limits  
11 that would be used for crops, livestock, and  
12 handling.

13           Corn steep liquor. OTA urges this  
14 Board to respect and support the decision of  
15 the 1995 Board and their classification of  
16 cornstarch as non-synthetic. Corn steep  
17 liquor is produced using the same process as  
18 cornstarch.

19           And in 1995, Dr. Richard Theuer  
20 and his Committee asked the same questions  
21 that are being asked today: does the process  
22 chemically change the cornstarch? And does a

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1 significant amount of SO2 remain in the  
2 cornstarch? The answers were no and no, and  
3 the same applies to corn steep liquor.

4           OTA is pleased that we do not  
5 observe anyone arguing the classification  
6 criteria per se. Instead, we observe a  
7 difference in scientific opinion. It is  
8 extremely complicated. Therefore, OTA  
9 supports your choice as an individual Board  
10 member to abstain if you are not ready to  
11 vote.

12           Nutrient vitamins and minerals.  
13 OTA supports a Committee vote to retain  
14 nutrient vitamins and minerals with the  
15 current annotation. And we thank the  
16 Committee for recognizing this first and very  
17 important step.

18           While we understand the concerns  
19 of adopting a new annotation at this meeting,  
20 we prefer and encourage a second vote to adopt  
21 OTA's clarified annotation referencing  
22 specific CFRs. The annotation is certifiable

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1 and enforceable and has received broad support  
2 at this meeting.

3 Crops. Three take-home messages.  
4 NOSB decisions need to be scale-neutral. The  
5 National Organic Program is a globally-applied  
6 standard, and neither an operation's location  
7 nor its size should be a factor when deciding  
8 the essentiality or fate of a material.

9 Decisions should not be made in  
10 the interest of reducing the number of  
11 materials used in organic production. Growers  
12 rely on the NOSB to make decisions that are  
13 based on factual evidence and a thorough  
14 evaluation to all of the criteria for organic  
15 materials review. If a viable alternative is  
16 not commercially-tested and available, a  
17 material should not sunset.

18 NOSB recommendations need to be  
19 based on the force of evidence. If new  
20 information is needed and a technical review  
21 is not received, the Committee should not  
22 recommend the removal of a material.

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1 CHAIR MIEDEMA: Thank you,  
2 Gwendolyn.

3 MS. WYARD: Thank you very much.

4 CHAIR MIEDEMA: Thank you.

5 Any questions for Gwendolyn Wyard?  
6 Okay, let's start with John and, then, Jay.

7 MR. FOSTER: On the ever-popular  
8 corn steep liquor discussion, when you said  
9 something about differing scientific opinion,  
10 could you clarify that or at least get more  
11 specific about what you meant by that?

12 MS. WYARD: Absolutely. So, one  
13 thing that has been really encouraging, I  
14 think a great thing that is coming out of the  
15 discussion is that what I see in both the  
16 minority and the majority is everybody is  
17 asking the questions that are in the  
18 classification document as far as the criteria  
19 for determining synthetic and non-synthetic.

20 The difference of opinion, the  
21 main differences of opinion that have been  
22 discussed today have been between Dragan

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1 Macura and Dr. David Johnston from ARS, the  
2 ARS researchers that have been referred to.  
3 But there are also other scientists that are  
4 involved.

5 And I get concerned because a lot  
6 of the discussion has been about whether or  
7 not the scientists have a horse in the race.  
8 I think that, based on the research that I  
9 did, that Dr. David Johnston, he holds a  
10 patent in enzymatic process for corn wet  
11 milling. I think that Dr. Johnston also has  
12 a horse in the race. But I also know of  
13 another individual, a very well-respected  
14 scientist, that doesn't necessarily have a  
15 horse in the race, but he has certainly been  
16 going to the horse races and he understands  
17 the context extremely well.

18 (Laughter.)

19 I would say that he doesn't even  
20 have a nickel to gain. That would be Dr.  
21 Richard Theuer.

22 Thank you.

1                   He was the TAP reviewer in 1995.  
2                   He knows the process very well, and he has  
3                   submitted multiple comments on corn steep  
4                   liquor. And he has determined corn steep  
5                   liquor to be non-synthetic.

6                   So, I think if there is a  
7                   scientific opinion out there that has weighed-  
8                   in on this, Richard Theuer would be a great  
9                   one to focus on, and his determination focuses  
10                  on corn steep liquor and the chemical change  
11                  has not occurred in the corn steep liquor.

12                  CHAIR MIEDEMA: Okay. Thank you.

13                  MS. WYARD: Thank you. Yes.

14                  CHAIR MIEDEMA: All right. Can  
15                  you make it brief, Jay? We are overtime.

16                  MR. FELDMAN: Yes. Thanks, Gwen.

17                  You have mentioned Theuer now.  
18                  You have impugned the reputation of David  
19                  Johnston. So, I am wondering what the  
20                  reputation of OMRI is and why, you know, the  
21                  new Board members should know and have your  
22                  explanation for this because this is critical.

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1 OMRI, who we rely on as a community --

2 CHAIR MIEDEMA: What is your  
3 question?

4 MR. FELDMAN: -- has a 10-member  
5 Board, a Technical Advisory Board that reviews  
6 all these materials, and seven of three --

7 CHAIR MIEDEMA: Please ask your  
8 question. NOSB members, please ask your  
9 question.

10 MR. FELDMAN: Okay. Why do we not  
11 hear your critique of the OMRI decision and  
12 history on the corn steep liquor decision,  
13 which was very strong, extremely strong and  
14 technical? Why does that not come up in your  
15 analysis?

16 MS. WYARD: It didn't come up in  
17 this analysis. It could come up. I would be  
18 more than happy to do that.

19 MR. FELDMAN: But you are telling  
20 us we should rely on Richard Theur; whereas,  
21 the entity, the institution this community  
22 relies on for technical information, it just

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1       seems --

2                   CHAIR MIEDEMA: Jay, you have  
3       asked your --

4                   MR. FELDMAN: It just seems like  
5       you are leaving that out.

6                   CHAIR MIEDEMA: Okay. Let her  
7       answer. Jay?

8                   MR. FELDMAN: I am trying to  
9       figure out why you are leaving that out.

10                  MS. WYARD: I did not --

11                  CHAIR MIEDEMA: Let her answer  
12       your question, please. Okay? Let's not  
13       badger the public and let them answer the  
14       questions we ask.

15                  MS. WYARD: Again, it comes down  
16       to scientific opinions. I would really need  
17       OMRI to speak for their decision that they  
18       made. I believe that their decision came down  
19       to whether or not there was a change in  
20       functional properties, and I would have to go  
21       back and reexamine that.

22                  But I did choose to focus on

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1 Richard Theuer primarily because, again, I  
2 want us to respect the decision of a past NOSB  
3 Board. And I think that Richard was an  
4 appropriate person to look at because the  
5 Board had already made a determination that  
6 cornstarch is non-synthetic. And I think that  
7 that was the area I chose to focus.

8 And I would have to ask OMRI to  
9 discuss their determinations. I am aware of  
10 them, but I am not prepared to go into them in  
11 detail.

12 Thank you.

13 CHAIR MIEDEMA: Okay. Thanks very  
14 much.

15 Next up is Eli Penberthy or  
16 "Ellie" Penberthy. John Ashby is standing by.

17 MS. PENBERTHY: Hi. My name is  
18 Eli Penberthy, and I am here speaking as a  
19 consumer as well as the seafood advisor at PCC  
20 Natural Markets here in Seattle.

21 The Board's recommendation to  
22 certify farmed fish is flawed as written and

1 must be revised. The marine feedlots of open  
2 ocean aquaculture violate fundamental organic  
3 principles. I ask you to revise the  
4 recommendation, so that only vegetarian  
5 species in closed land-based systems may be  
6 certified organic.

7 Carnivorous fish, such as salmon,  
8 tuna, cod, and halibut, raised on pellets made  
9 from wild fish must not be eligible to be  
10 certified organic. The dioxins, PCBs, and  
11 other contaminants concentrated in the feed  
12 are passed along to consumers. The  
13 Environmental Working Group found farmed  
14 salmon have 16 times more PCBs than wild  
15 salmon.

16 The Board's recommendation for  
17 farmed salmon would allow up to 25 percent of  
18 the feed to be wild-caught fish. This  
19 violates the principle that organic animals  
20 must be raised on 100 percent organic feed.  
21 It also results in an unsustainable loss of  
22 protein. To add a pound of weight to farmed

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1 salmon requires three to nine pounds of small  
2 fish. Cod, halibut, tuna, and other  
3 carnivorous species may need up to 15 to 20  
4 pounds.

5 One-third of the ocean's harvest  
6 is herring, anchovies, mackerel, and other  
7 small fish which are made into fish meal and  
8 oil for fattening farmed fish and animals.  
9 The aquaculture industry already uses more  
10 than half of the world's fish meal and more  
11 than 80 percent of the fish oil. This is  
12 simply unsustainable and violates the core  
13 organic principle to restore, maintain, and  
14 enhance ecological harmony and balance natural  
15 systems.

16 Floating feedlots endanger native  
17 marine species, flushing unfiltered fish waste  
18 into the environment, while sea lice and other  
19 parasites and diseases are rampant and linked  
20 to die-offs of juvenile wild salmon and other  
21 fish. Sea lice are showing resistance to  
22 chemical pesticide treatments.

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1                   Confining migratory wild fish with  
2 strong instinctual drives, such as salmon, in  
3 cages prevents them from exercising their  
4 natural behaviors, violating another core  
5 organic principle.

6                   Current recommendations are too  
7 broad and should not automatically include all  
8 species. They fail to meet the high standards  
9 that organic consumers expect. A better  
10 approach would be to consider for  
11 certification closed land-based systems that  
12 recirculate water, collect waste for  
13 fertilizer, can provide organic feed for  
14 vegetarian fish, and do not threaten wild  
15 stocks. Catfish and tilapia would be a good  
16 place to start.

17                   I also brought copies of PCC's  
18 newsletter, "The Sound Consumer", and the  
19 cover story this month is about organic  
20 aquaculture, the question of whether it is  
21 feasible.

22                   CHAIR MIEDEMA: Thank you, Ms.

1 Penberthy.

2 Any questions?

3 (No response.)

4 John Ashby is up next, and, then,  
5 we will go to a short break.

6 MR. ASHBY: I am John Ashby with  
7 California Natural Products.

8 Last time I gave comments, I gave  
9 them in the form of haiku, and I got so much  
10 grief for it that I swore I would never do it  
11 again.

12 (Laughter.)

13 But I figure the iambic pentameter  
14 format of the Elizabethan sonnet, that should  
15 be safe.

16 (Laughter.)

17 Hence, what silicon through yonder  
18 window doth flow? In our mortal lives, we  
19 aren't always able to sagaciously ferret the  
20 fact from the fable. To make a powder seems  
21 simple enough, though to make a powder, you  
22 must make it flow.

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1 (Laughter.)

2 I've been making powders for 20  
3 years more. The one biggest fear is that it  
4 won't pour.

5 (Laughter.)

6 A powder food maker has three  
7 tools in their kit. There's fiber and silicon  
8 and calcium; that's it.

9 (Laughter.)

10 There's so many forms of these  
11 three simple types. Sometimes one works;  
12 sometimes others. You need them all. Yipes!

13 (Laughter.)

14 One thing ain't the answer. That  
15 never will work. To think otherwise is to  
16 just be a -- unknowledgeable product  
17 developer.

18 (Laughter.)

19 The petitioner's item is rice  
20 hulls. Yahoo! C&P is rice. But it's 70  
21 percent fiber, 17 silicon, that's true. It's  
22 fiber, not mineral. So, what will it do?

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1 Will work in some cases; in others, no, no.

2 Alas, though a fiber just isn't a  
3 rock, it acts like a fiber, not silicon.  
4 What? Shocked?

5 It don't defoam liquids because it  
6 ain't  $\text{SiO}_2$ . It acts like a fiber. The foam,  
7 it won't do.

8 Without having silicon, my solids  
9 will stick. I'll be out of business. I can't  
10 sell a brick.

11 (Laughter.)

12 A fiber won't do it. Don't know  
13 other tricks. Need silicon dioxide, so my  
14 powders don't stick.

15 (Applause.)

16 CHAIR MIEDEMA: Thank you.

17 Katrina?

18 MS. HEINZE: I get one off-the-  
19 cuff one. Do you teach that as a skill?

20 (Laughter.)

21 MR. ASHBY: I'm not sure. Okay?

22 CHAIR MIEDEMA: All right. Thank

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1 you very much.

2 We will take a 10-minute break.  
3 Five minutes after the hour, please, Board  
4 members.

5 (Whereupon, the foregoing matter  
6 went off the record at 2:56 p.m. and resumed  
7 at 3:13 p.m.)

8 CHAIR MIEDEMA: We're back in  
9 session.

10 Next up is Dave Martinelli. Dave,  
11 are you in the room?

12 MR. MARTINELLI: Here.

13 CHAIR MIEDEMA: Thank you.

14 Brynn Arborico, you are standing  
15 by. Brynn, are you in the room?

16 MS. BRYNN ARBORICO: I am.

17 CHAIR MIEDEMA: Thank you.

18 Go ahead, Mr. Martinelli.

19 MR. MARTINELLI: Dave Martinelli,  
20 Coleman Natural Foods.

21 I want to thank Madam Chair for  
22 allowing a break between John Ashby and I. He

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1 would be a tough act to follow.

2 (Laughter.)

3 So, this time I am actually not  
4 going to speak to you all about methionine, so  
5 you get a break from that topic. I know it's  
6 a disappointment.

7 But I have a very kind of detailed  
8 comment about one aspect of the animal welfare  
9 slaughter/transport document. There is a  
10 provision in there, Item 5 under Section (a).  
11 "Slaughter plant management shall coordinate  
12 with transporters to assure that waiting time  
13 on the shipping container is no more than one  
14 hour." And my understanding is that would be  
15 the wait time of the delivery truck with the  
16 live animals at the processing facility.

17 I think for certain species that  
18 may be appropriate. I would tell you for  
19 poultry it is completely unworkable. And the  
20 reason for that is those animals are not put  
21 in any other holding area prior to slaughter.  
22 They go immediately from the truck to the

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1 slaughter facility. It is physically  
2 impossible to schedule with that degree of  
3 accuracy, that the birds would never be on the  
4 truck for more than one hour after they arrive  
5 at the plant.

6 Really, it is also a significant  
7 disadvantage for smaller processors who, by  
8 virtue of the size of their facility and the  
9 speeds of their line, often it takes them  
10 multiple hours to process a single load of  
11 birds. So, they would be in violation of the  
12 standard virtually all the time.

13 I would tell you that producers in  
14 general have a significant disincentive from  
15 keeping birds or any livestock for an extended  
16 period of time in a holding, a shipping  
17 container. You do have yield loss that occurs  
18 on the animal, and purely from an economics  
19 perspective most processors will self-regulate  
20 and try to keep the birds or other livestock  
21 in a shipping container for the minimum amount  
22 of time that is possible.

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1                   That being said, in the case of  
2 poultry specifically, the birds do need a  
3 certain amount of calming and settle time  
4 after transport. So, you would probably leave  
5 them on the trailer for maybe an hour, up to  
6 a max of six or eight hours would probably be  
7 a better maximum, if you felt you needed to  
8 have a maximum number in the regs.

9                   One thing I would like you to  
10 consider is maybe, rather than focusing  
11 strictly on the amount of time that the  
12 animals are waiting, is maybe beefed-up  
13 language -- a bad pun -- stepped-up language  
14 around the conditions under which the animals  
15 are held, so the environment that they are in.  
16 You know, to maybe add some more language  
17 around the fact that they need to be  
18 sheltered; they need to be adequately cooled  
19 or heated, dependent on the outside  
20 conditions. That might be a more appropriate  
21 way to address the welfare of the animal  
22 during that period of time.

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1           And lastly, a question that came  
2           up yesterday, I believe, around whether we are  
3           going down the path of having this be a  
4           regulation or a guidance document. You know,  
5           one concern that we would have is whatever  
6           wait time is determined to be appropriate, and  
7           let's say it's eight hours, and there is a  
8           breakdown in the facility that requires that  
9           those birds stay on the trailer for a longer  
10          period of time, nine hours. Technically, at  
11          that point the processor is in violation of  
12          the organic standard. I mean, are those birds  
13          able to be sold as organic at that point is  
14          the question.

15                   CHAIR MIEDEMA: Thank you.

16                   Any questions for Dave Martinelli?

17                   (No response.)

18                   Thanks very much.

19                   MR. MARTINELLI: Thank you.

20                   CHAIR MIEDEMA: Brynn Arborico is  
21           up next.

22                   Mark Kastel, you are standing by.

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1 MS. BRYNN ARBORICO: So, hi. My  
2 name is Brynn Arborico, and I am 16. I am a  
3 tenth-grade student at Seattle Academy, as  
4 well as being a five-year chicken owner.

5 So, I have four hens. It is  
6 generally my job to let them out of their coup  
7 where they spend the night every morning. It  
8 is a pretty hard job to forget because, if I  
9 do, they will just kind of kick up a ruckus  
10 and start clucking and yelling.

11 And as soon as I let them out,  
12 they all just kind of pour out of the coup.  
13 Then, they will go to like different parts of  
14 the yard and do whatever I guess it is that  
15 chickens do best.

16 (Laughter.)

17 And I just say this because I  
18 think that for me it is a really definitive  
19 just example of how much space is important to  
20 chickens. I know that my hens just really  
21 aren't too happy when they are in something  
22 like one square foot or two square feet per

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1 bird.

2           So, my chicken ownership hasn't  
3 made me a vegetarian or anything. I still  
4 like my beef and my chicken. But I think it  
5 has really drawn my attention to the welfare  
6 of these birds and to the fact that,  
7 basically, all this livestock is being raised  
8 and is kind of sacrificing its life so that I  
9 can eat it. I think that that makes me feel  
10 like I have a responsibility towards making  
11 sure that its life is as good as it can be.

12           So, like different animals require  
13 different things for happiness. So, I don't  
14 know. As a human, you might require a fun job  
15 and a plane ticket around the world, but as a  
16 dog, you might require two walks a day. As a  
17 cow, you might require pasture.

18           And I think that, given my  
19 experience as a chicken owner, the things that  
20 chickens need most or value most is outdoor  
21 access and space. So, this kind of brings me  
22 to the label organic. It is that whenever I

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1 bug my parents or housemates to buy organic,  
2 it is generally not out of like a health  
3 concern for myself or something like that, but  
4 it is more that I feel it is an ethical  
5 choice. Because I believe that doing so  
6 results in, it contributes to having like  
7 happier small-scale farms, a better  
8 environment, and, then, also, more humane  
9 treatment of livestock.

10 I think that the same thing could  
11 be said about a lot of people I know who buy  
12 organic. So, for me, since happy animals is  
13 such a big part of that, I just think that  
14 happy animals is really more than one square  
15 foot per chicken.

16 So, thank you.

17 (Applause.)

18 CHAIR MIEDEMA: Thank you very  
19 much.

20 MS. BRYNN ARBORICO: Okay.

21 CHAIR MIEDEMA: Any questions?

22 (No response.)

1 Thank you.

2 Mark Kastel, you are next.

3 MR. KASTEL: Hello. My name is  
4 Mark Allen Kastel. I am Co-Director of the  
5 Cornucopia Institute. We are based in  
6 Cornucopia, Wisconsin. I am here today  
7 representing over 4,000 members, most of whom  
8 are organic farmers, and I have a proxy from  
9 Cornucopia's newest Board member and former  
10 NOSB member, Kevin Engelbert.

11 The Chair and Executive Committee  
12 has broken tradition this week and broken the  
13 rules governing the conduct of this body, as  
14 articulated in the Procedure Manual. Although  
15 the language would indicate that the Chair has  
16 the authority to deviate from the specified  
17 five-minute public testimony, past Board  
18 members have said when it was promulgated, it  
19 was clear that it was written with the intent  
20 to give people more time, not less.

21 But what is not open to debate is  
22 that the Manual requires the use of proxies,

1 taking testimony in the order of regulation.  
2 It does not give the Chair the authority to  
3 limit questions by the Board and selecting who  
4 is going to get two minutes of questions and  
5 who is going to get five to ten minutes of  
6 questions.

7 We understand the challenges, but  
8 other alternatives could have been developed  
9 to provide the maximum amount of information  
10 exchange between the community and these  
11 valuable Board members.

12 Hogs. Although the Committee  
13 modifications are an improvement and  
14 acceptable in many regards, the space  
15 requirements for small pigs are still woefully  
16 inadequate and in line with the standards for  
17 major CAFO groups in the United States. We  
18 would recommend adopting the European  
19 standards, and they are delineates in one of  
20 the handouts I just spread out.

21 Poultry. The proof is in the  
22 organic pudding. Hundreds of commercial-scale

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1 certified organic poultry producers around the  
2 country are complying with the law and  
3 letting their birds outside.

4 Birds are not dropping dead.  
5 Avian influenza and other pathogenetic  
6 outbreaks are not occurring. Consumers are  
7 willing to pay premiums for nutritionally-  
8 superior eggs that are safe.

9 The testimony of Mr. Greg  
10 Herbruck, who called himself a, quote,  
11 "farmer" and his staff member represents other  
12 industrial producers, Herbruck with well over  
13 somewhere between a million and 2 million  
14 birds, he called himself an organic farmer.  
15 Conventional, mostly in cages, sold to  
16 Eggland's Best or McDonald's. These folks  
17 should not be setting the standard for this  
18 industry. They own one corporate-owned farm  
19 with four buildings with 100,000 birds per  
20 building that never go out in the legitimate  
21 outdoor access. And even though this debate  
22 is taking place, they are building two more

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1 buildings at that same facility in the same  
2 model.

3 I have no reason to question their  
4 sincerity, but this is a voluntary program.  
5 If they truly believe their birds are better  
6 off and their eggs are healthier that's fine;  
7 keep them inside. Just don't put the organic  
8 seal on there.

9 CHAIR MIEDEMA: Thank you, Mr.  
10 Kastel.

11 MR. KASTEL: So, I am open to  
12 questions. I didn't get a chance to cover the  
13 FDA rule, outdoor access for pullets, and the  
14 vaccine protocol.

15 And here is the total of 2,000  
16 signatures on the latest petition, just since  
17 we gave you our signatures the other day.

18 CHAIR MIEDEMA: Thank you, Mr.  
19 Kastel.

20 Any questions?

21 MR. KASTEL: Thank you.

22 CHAIR MIEDEMA: Jay Feldman and

1 Nick.

2 MR. FELDMAN: So, in terms of  
3 outdoor access for pullets, what are you  
4 saying about the safety proposal on the table?

5 MR. KASTEL: Well, I would respond  
6 two ways. One is, since there is the  
7 contention that outdoors in this beautiful  
8 planet of ours is soiled and spoiled, and that  
9 we can't safely let the birds out, I guess we  
10 shouldn't be growing organic crops outdoors,  
11 either. So, we should sterilize the soil,  
12 grow them within greenhouse structures. You  
13 know, we have to deal with the environment,  
14 and, hopefully, we are all contributing to  
15 improving the environment.

16 There are widespread problems with  
17 avian influenza and other disease outbreaks,  
18 but they haven't happened at homes, like our  
19 last testifier. They haven't happened on  
20 hobby farms, and they are not happening on  
21 commercial-scale organic production facilities  
22 for poultry.

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1           They have happened on CAFOs where  
2           the birds' immune systems are compromised,  
3           where they are being fed medicated feed, where  
4           they are under tremendous stress because they  
5           are not able to exhibit their natural  
6           instinctive behaviors.

7           But, more specifically, I would  
8           tell you that before I came here, I was asked  
9           by a certifier the same question. And I  
10          called Ryan Miller, who runs Farmer's Henhouse  
11          in Kalona, Iowa. They manage 35 flocks.  
12          Their eggs are marketed both by Farmer's  
13          Henhouse and Organic Valley.

14          They have had over the years one  
15          positive Salmonella outbreak that was traced  
16          to rodents inside a building. I visited all  
17          35 of these farms during our research study  
18          that we have shared with you folks, and they  
19          all legitimately get their birds outside,  
20          mature birds.

21          They raise their own pullets.  
22          Depending on the producer I talk to, they are

1       somewhere between six and twelve weeks. No  
2       disease problems, no positive SE swabs.

3               MR. KASTEL: Nick Maravell has a  
4       question, too.

5               MR. KASTEL: I'm sorry.

6               CHAIR MIEDEMA: Do you mind if we  
7       get to our second --

8               MR. KASTEL: Yes.

9               CHAIR MIEDEMA: -- Board member's  
10      question.

11              MR. KASTEL: Yes, Tracy, I was  
12      done. Thank you.

13              CHAIR MIEDEMA: Okay. Nick?

14              MR. MARAVELL: Mark, I don't think  
15      anybody on the NOSB is trying to limit debate,  
16      but we are trying to get the job done and it  
17      is taking some time.

18              What I would like some input on is  
19      how you and other members of the community  
20      might be able to help us out here. Are there  
21      ways in which we can still get the information  
22      in the way that you would like to see us get

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1 it and still not make our Board meetings  
2 longer than they are now? I think,  
3 historically, Board meetings may have started  
4 out at two, two-and-a-half days, and now we  
5 are up to four days.

6 So, if there are some constructive  
7 things that we can do here, things that would  
8 put people's mind at ease, if there are things  
9 that technology can help us with, bring us  
10 something. Nobody wants to limit debate. We  
11 need all the input that we are getting. We  
12 just need to be able to do other things in  
13 life.

14 MR. KASTEL: Nick, we sympathize  
15 because we are in here, at least one of us  
16 from Cornucopia, the whole time.

17 We will send the Board members  
18 some ideas. But one would be to cut off  
19 debate at some point or cut off registration  
20 at some point. We were an hour ahead of time,  
21 and I would testify that that would equal all  
22 the proxies from past years at five minutes,

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1 not three minutes.

2 And, for instance, the three of us  
3 at Cornucopia, if we are tight on time, we  
4 don't require all three of us to have proxies  
5 and 10 minutes apiece. But I can tell you,  
6 some of the people that didn't show up were  
7 our farmer members who said, after it was cut  
8 down to three minutes, they said, "This is so  
9 disrespectful. I can't invest five hours each  
10 way to drive into this event to speak for  
11 three minutes." They just didn't show up.

12 So, there is a happy medium  
13 somehow here. The most egregious aspect of  
14 this, in my opinion, is cutting off your  
15 questions. I want to hear Marty Mesh talk  
16 about Oprah.

17 MR. MILLER: Thank you, Mr.  
18 Kastel. You did receive much more than the  
19 five minutes, and it is time for --

20 MR. KASTEL: Yes, I did, but not  
21 everyone did.

22 CHAIR MIEDEMA: -- our next

1 speaker.

2 MR. KASTEL: I appreciate it.

3 CHAIR MIEDEMA: Let's go ahead and  
4 move on to Marley Arborico.

5 MR. KASTEL: Thank you.

6 MS. MARLEY ARBORICO: Hi. So, I  
7 am Marley Arborico. I am a freshman at  
8 Seattle Academy of the Arts and Sciences.

9 When I was little and I had pets  
10 like guinea pigs and rabbits, my mom, who is  
11 in a psychology, taught me that the only way  
12 that you can tell whether an animal is happy  
13 or whether it is experiencing discomfort is to  
14 give it freedom and see what it is attracted  
15 towards and what it avoids.

16 And I have owned lots of chickens.  
17 I have owned them for five years. Right now,  
18 we have four. And when our chickens are let  
19 free in our yard, they never choose to go in  
20 the coup. And they are never static; they are  
21 always moving, and they are changing the sites  
22 of their dirt baths and changing the sites of

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1 where they are eating. And they are never  
2 close together, either. They are always  
3 spread out. They know where each other are,  
4 and they communicate, but they don't choose to  
5 be packed body to body.

6 And at my house, the two things  
7 that agitate my chickens the most are when a  
8 cat comes in the yard or when we force them to  
9 be in their coup all day.

10 Sometimes we take our chickens up  
11 to our island. We have a cabin on an island.  
12 There they can roam basically as much as they  
13 want. When we bring them back to our home in  
14 the city, they always are agitated by the fact  
15 that they can't get beyond our fences. I  
16 think that this really shows how important  
17 freedom and space is to them.

18 To me, the idea of a chicken  
19 having only one foot inside or two feet  
20 outside is just horrifying. I know that when  
21 I sit down at my dinner table I want to be  
22 able to feel good about what I am eating. I

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1 personally don't want to buy food or eat food  
2 that I feel is inhumane. I don't think that  
3 two feet or one foot is enough.

4 Thank you.

5 (Applause.)

6 CHAIR MIEDEMA: Any questions for  
7 Ms. Arborico?

8 (No response.)

9 Thank you.

10 Hal Kreher is up. Eiko Vojkovich  
11 is standing by.

12 MR. KREHER: Hi. My name is Hal  
13 Kreher. I am a third-generation poultry  
14 farmer from Buffalo, New York. My family has  
15 been raising chickens for over 87 years.

16 I am submitting an entire packet  
17 of information I hope you will give careful  
18 consideration to. There are a few letters,  
19 most noticeably, one from a parasitologist  
20 from Cornell University Veterinary College  
21 that details the parasites that are now rare,  
22 which will become increasingly a problem for

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1 organic flocks with exposure to soils.

2 These are things that my  
3 grandfather and my father had to deal with.  
4 Unfortunately, they are no longer with us to  
5 come and talk. I sure wish they were.

6 Pardon my voice. I am a little  
7 upset after a previous speaker who claimed  
8 that the avian influenza is a problem of  
9 CAFOs. There are currently two avian  
10 influenza cases in the United States, do you  
11 know that, right now?

12 There is one on a turkey farm in  
13 Missouri. They have 30,000 turkeys. That is  
14 technically not a CAFO. Okay?

15 And, then, there is another, and  
16 this is in the packet of information that I am  
17 sending around, there is another one in  
18 Nebraska in backyard flocks. So, yes, it does  
19 happen in backyard flocks.

20 You know, I am a little upset when  
21 somebody would come and spread misinformation  
22 like that. It is very upsetting to me.

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1                   There is a handout, a fact sheet  
2                   from the USDA on avian influenza. One of the  
3                   things it shows is that in 1983-84 we were hit  
4                   by a tsunami, the outbreak of high-path avian  
5                   influenza in Pennsylvania and Virginia.  
6                   Seventeen million birds were euthanized to  
7                   control it. We must prevent this from ever  
8                   happening again. It is the right thing to do  
9                   for proper animal care.

10                   There are also two handouts. I  
11                   talked about those already. There is a  
12                   handout that is a USDA biosecurity guide which  
13                   is recommended by NOP Policy Memo 11-12. This  
14                   memo directs organic producers and certifiers  
15                   should review APHIS guidance on this issue and  
16                   determine any action necessary to protect  
17                   organic poultry flocks.

18                   The guidance contains a section on  
19                   steps to disease prevention. The first step  
20                   is to keep your distance, to keep flocks in  
21                   the best of health, editor's note, highest  
22                   animal welfare, you need to isolate your birds

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1 from visitors and other birds. Here's how; it  
2 goes on.

3 "Game birds and migratory  
4 waterfowl should not have contact with your  
5 flocks because they carry germs and diseases.  
6 If your birds are outdoors, try to keep them  
7 in an enclosed area with a solid roof" -- it  
8 is on there right from APHIS -- "and wire mesh  
9 or netted sides."

10 I also included a chart that was  
11 developed as part of the European research  
12 into the welfare implications of different  
13 housing systems for laying hens, known as the  
14 "Lay Well Study".

15 It is a study of the research that  
16 is done on poultry welfare. What they  
17 basically found was that all these different  
18 housing systems had tradeoffs. There were  
19 various risk factors for animal welfare, and  
20 the amount of risk for each particular welfare  
21 indicator varied, depending on the system.  
22 There was no one system that ensured that the

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1 hens were cared for in the best way.

2 So, the system that is used in  
3 order to address these risks has to be  
4 managed. And I suggest developing a list of  
5 the various humane care standards, American  
6 humane farm animal care, and let the farmers  
7 choose a system off that. All of these are  
8 third-party audited to ensure compliance and  
9 continuous improvement in the management  
10 system.

11 CHAIR MIEDEMA: Katrina?

12 MS. HEINZE: Animal welfare is  
13 turning out to be a tough one at this meeting.

14 MR. KREHER: Yes.

15 MS. HEINZE: You know, we have  
16 heard from so many people that they want us to  
17 move forward. So, my question for you is, if  
18 we move forward indicating a strong desire  
19 that much of this be in guidance, so that it  
20 could evolve as we learn, what does that mean  
21 for you?

22 MS. ALLAN: Well, first of all,

1 let me say that there are no producers that  
2 are against animal welfare. We all depend on  
3 these animals for our livelihoods. We take  
4 excellent care of them. Their health is  
5 paramount to our success.

6 To me, the best thing that you  
7 could do would be to develop this list. And  
8 it shouldn't be just one. It should be a list  
9 of American humane certified, humane farm  
10 animal care, food alliance. You know, if you  
11 want, that GAP five-step program.

12 And let the farmers choose off of  
13 that list which one. They have all looked at  
14 so many more things than you have looked at.  
15 They have looked at not just perch space, but  
16 they have looked at feeder space. They look  
17 at nesting space. There are so many more  
18 issues.

19 For American Humane care, you have  
20 to look at your mortality every day and write  
21 down a cause of death, so that they know you  
22 looking at that, and if you have got a

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1 problem, that you are addressing it.

2 Maybe it wouldn't be appropriate  
3 for a small farm, but over a certain size a  
4 third-party system seems to me to be a good  
5 idea.

6 CHAIR MIEDEMA: Katrina?

7 MS. HEINZE: I think that meant  
8 no. Is that correct?

9 (Laughter.)

10 MR. KREHER: No to?

11 MS. HEINZE: If it moved forward  
12 as guidance, you don't like that option?

13 MR. KREHER: Well, I could see it  
14 moving forward as guidance.

15 MS. HEINZE: Oh, I'm glad I asked.

16 (Laughter.)

17 CHAIR MIEDEMA: Any other  
18 questions?

19 (No response.)

20 MR. KREHER: Thank you.

21 CHAIR MIEDEMA: Thank you, Mr.  
22 Kreher.

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1                   Eiko Vojkovich is up next. Zareb  
2 Herman is standing by.

3                   MS. VOJKOVICH: Hello. My name is  
4 Eiko Vojkovich. My husband and I own Skagit  
5 River Ranch, and we sell about 200 head of  
6 organic grass-finished cattle, about 20,000  
7 dozen eggs, 200 hogs a year.

8                   We have been farming organic 12  
9 years now. I also sit on the Washington State  
10 Organic Advisory Board.

11                   I want to thank you for bringing  
12 the meeting to this area, the only reason I  
13 could be here this week. I hope you continue  
14 to go around the country for NOSB meetings.

15                   Sitting through this week, I  
16 realize I am one of those minute and  
17 insignificant group of farmers that Mr. Miller  
18 from Iowa talked about. And we are also proud  
19 to be making a minute living. And I am proud  
20 of the fact that our eggs scored the highest  
21 number 5 in the Cornucopia organic egg  
22 scoreboard. We sell to about 500 families

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1 through four local farmers' markets, eight  
2 restaurants, five health food stores on a  
3 weekly basis.

4 With due respect, I disagree with  
5 Mr. Miller that we are an insignificant group.  
6 I would even venture to say it is these small  
7 organic farmers that keep the backbone of this  
8 organic industry.

9 Today I want to focus on the  
10 consumers' aspect of this industry, since my  
11 farm mostly does direct marketing, and I know  
12 knowing what my customers want directly  
13 affects our farm's survival. The consumers  
14 are the ones who are demanding this animal  
15 welfare. And as a sustainable farmer, I fully  
16 support the movement.

17 I would also like to appeal to the  
18 common-sense approach of food safety,  
19 providing a more healthy environment that  
20 Nature intended. Therefore, increasing the  
21 immune system of the animals is what leads to  
22 food safety, not confining them any further.

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1           If USDA regulation, that conflicts  
2           with the welfare of the animals, then perhaps  
3           it is a USDA regulation that needs to change  
4           and not the advancement of animal welfare.

5           As this country grapples with an  
6           epidemic of obesity, we know that USDA is  
7           changing their recommendation of what we eat.  
8           So, they are also evolving.

9           I urge you to go forward with this  
10          animal welfare proposal. Have courage to come  
11          up with the best plan and go forward.

12          Yesterday I heard two mothers on  
13          this Board speak about their kids' eating  
14          habits of apples. That was the most real  
15          connection to the real consumer base that I  
16          saw in the entire meeting that I deal with  
17          every day. I feel that is the heart of the  
18          mothers we all need to have to advance this  
19          program forward. Our customers seek -- they  
20          are very educated customers -- they seek  
21          nutrient-rich whole foods that are humanely  
22          raised.

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1                   Thanks to Deputy Director Miles  
2                   McEvoy and his crew, I see some violators are  
3                   being penalized to keep the integrity of the  
4                   program. The law has to be sound and  
5                   reasonable to keep farmers' and consumers'  
6                   faith in the system.

7                   I urge you to go forward with the  
8                   animal welfare, and I appreciate your keeping  
9                   small farmers like us and consumers in mind  
10                  while you are making the deliberation.

11                  Thank you so much for your time.

12                  CHAIR MIEDEMA: Thank you.

13                  Any questions for Ms. Vojkovich?  
14                  Yes?

15                  MR. FELDMAN: I'm curious what you  
16                  think the large commercial industry can learn.  
17                  We have heard from the younger generation what  
18                  they feel the large commercial industry can  
19                  learn from their experience with chickens.  
20                  What can we learn from you?

21                  MS. VOJKOVICH: You know, I think  
22                  in many ways our chickens are -- you know, I

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1 was calculating the requirements, stall  
2 requirements, and ours is about six to seven  
3 square feet per chicken. And they're happy.

4 (Laughter.)

5 I encourage you all to go visit  
6 the poultry farms because there are happy  
7 chickens and there are unhappy chickens,  
8 period. End of story. There is no BS there.

9 So, I hope you listen to those  
10 young folks because they consumers are very  
11 knowledgeable. They want to eat humanely-  
12 treated animals. That is what we want to do.

13 And it is our farmers'  
14 responsibility to make them happy while they  
15 are in care. I think that is our primary  
16 goal.

17 Thank you.

18 MR. MILLER: John Foster?

19 MR. FOSTER: Thank you.

20 I had a question. If you have a  
21 general sense of about how far away are your  
22 consumers from you?



1 MS. VOJKOVICH: They're about 100  
2 miles.

3 MR. FOSTER: Just ball park?

4 MS. VOJKOVICH: A hundred, 150  
5 miles.

6 MR. FOSTER: That helps me. Thank  
7 you.

8 MS. VOJKOVICH: Yes.

9 CHAIR MIEDEMA: Thank you.

10 One more. Barry?

11 MR. FLAMM: I can tell you are  
12 very in tune with your customers and  
13 consumers. I wonder if you have an opinion on  
14 the use of antibiotics and how your consumers  
15 would react if they knew that the apples they  
16 were eating were treated with antibiotics.

17 MS. VOJKOVICH: You know, that is  
18 interesting. I think I know where you are  
19 going, but I don't think I am going to bite to  
20 the bait.

21 (Laughter.)

22 Because let me tell you something.

1 That is why I said about the mothers talking  
2 about that. And I am going to get back at you  
3 with the questions because what you talk  
4 about, the kids not eating inedible apples are  
5 the real story. Unless we can satisfy the  
6 consumer who wants to eat Fujis and Galas,  
7 we're out of business. So, I hope you keep  
8 that in mind.

9 It might be great to have a  
10 McIntosh, but it is going to take millions and  
11 years to develop that marketing change. So,  
12 that is a marketing problem.

13 Thank you.

14 CHAIR MIEDEMA: Thank you.

15 (Applause.)

16 Zareb Herman is up at the podium,  
17 and Maurice Robinette is standing by.

18 Maurice, are you in the audience?

19 (No response.)

20 MR. HERMAN: Okay. Thanks.

21 Good afternoon.

22 My name is Zareb Herman. I am a

1 nutritionist with the Hain Celestial Group.  
2 Prior to my employment there, I worked as a  
3 research scientist for the Agricultural  
4 Research Service, which is part of the USDA.  
5 And I am addressing the Board on the subject  
6 of nutrients in organic foods.

7           Regarding the 205.605(b) listing  
8 of nutrient vitamins and minerals, it is  
9 coming up for Sunset review. Our company  
10 supports any action that allows the continued  
11 use of vitamins and minerals in organic foods.  
12 We would also agree with the clarification to  
13 the annotation that includes the nutrients  
14 listed in other portions of the CFR.

15           And very importantly, we would  
16 support any action by the Board that allows  
17 the continued use of so-called accessory  
18 nutrients until those nutrients can go through  
19 the petition process.

20           Now accessory nutrients are not  
21 unimportant nutrients. They just are not  
22 classified as vitamins and minerals. Examples

1 include amino acids, nucleotides, carotenoids,  
2 fatty acids such as DHA and ARA. And we  
3 understand that any of these substances will  
4 need to go through the National List process  
5 to be evaluated by this Board.

6 Now, for women who cannot breast  
7 feed, my company offers organic infant formula  
8 that contains some of these accessory  
9 nutrients. And so, why do we add them? The  
10 answer is that they naturally occur in breast  
11 milk. They are natural ingredients. They are  
12 absolutely safe. They are backed by numerous  
13 clinical studies, and their use is supported  
14 by leading pediatricians, infant formula  
15 experts, and sound scientific research.

16 And most importantly, they provide  
17 the best possible nutrition for babies. If I  
18 had a baby that had to be on formula, you can  
19 be assured that baby would receive these  
20 accessory nutrients in that formula.

21 Now a question: do consumers want  
22 fortified organic products? A recent OTA

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1 survey showed that 78 percent of the  
2 respondents said choosing fortified foods for  
3 their family is either very important or  
4 somewhat important. So, many organic  
5 consumers do want to have this option, and we  
6 say let the consumers decide.

7 And lastly, this Board is going to  
8 be evaluating petitions on these nutrients.  
9 We recognize it is a very emotional issue for  
10 some persons, and you are going to be  
11 bombarded with conflicting opinions. You know  
12 how many opinions in public comments you have  
13 already received.

14 We just strongly urge the Board to  
15 make the decisions based on scientific  
16 evidence that comes from scientists, doctors,  
17 and other credible sources.

18 Thank you.

19 CHAIR MIEDEMA: Thank you, Mr.  
20 Herman.

21 Any questions?

22 (No response.)

1 Thank you.

2 Maurice Robinette is at the  
3 podium. Fritzi Cohen is standing by.

4 MR. MAURICE ROBINETTE: Thank you  
5 for this opportunity to exercise my right to  
6 comment on a very serious issue.

7 I am a rancher, and I am  
8 transitioning to organic certification for my  
9 pasture and my beef. The USDA is helping me  
10 do this.

11 I hope my comments can be helpful  
12 to address a very divisive issue in  
13 agriculture and lead to a constructive  
14 solution.

15 I mention my rights because I  
16 think my right to grow what I want to is being  
17 jeopardized by the introduction of GMO  
18 alfalfa. GMO alfalfa pollen will eventually  
19 find its way to my field as long as bees fly  
20 from field to field. When this happens, I  
21 will be growing GMO alfalfa, and I don't want  
22 to. I cannot stop the bees from pollinating

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1 my alfalfa.

2 This genetic trespass is a  
3 violation of my right to grow what I want. If  
4 my bull trespassed onto a neighbor and bred  
5 his cows, I would be responsible and I would  
6 accept that responsibility.

7 I go to great lengths to prevent  
8 this. I can stop my bulls, but not my bees.

9 (Laughter.)

10 When I cows eat GMO alfalfa, my  
11 customers will no longer buy my beef. I may  
12 lose my pending organic certification. I will  
13 be damaged due to someone else's actions. I  
14 won't blame the farmer that grew the crop. I  
15 will blame the multinational corporation that  
16 made the genes in the first place and our  
17 government organization that allowed them to  
18 be released. This is the United States  
19 Department of Agriculture, the same  
20 organization that is paying me to transition  
21 to organic certification, the same  
22 organization that violated the law and ignored

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1 thousands of comments in the Environmental  
2 Impact Statement about GMO alfalfa, that  
3 allowed them to be released, and its potential  
4 damages to our livelihoods.

5 I know this is a simple version of  
6 reality, and the underlying issues and  
7 politics are very complex. But the basic  
8 problem is simple. I am being denied the  
9 right to grow what I want. Consumers are  
10 being denied the right to buy what they want.

11 Simple problems often have simple  
12 solutions. And I am asking this Board to help  
13 with that simple solution. Please consider  
14 doing whatever is in your power to establish  
15 mandatory labeling of all GMO food.

16 (Applause.)

17 You may think this is outside your  
18 job description. However, isn't a label, the  
19 organic label, the end product of everything  
20 you do?

21 Thank you.

22 (Applause.)



1 CHAIR MIEDEMA: Thank you very  
2 much, Mr. Robinette.

3 Any questions? I see a couple.  
4 Let's start with Nick Maravell and, then, Jay  
5 Feldman.

6 MR. MARAVELL: I think we have  
7 exited from the statutory authority of the  
8 NOSB. So, you can rule me out of order here,  
9 Madam Chair, if you like.

10 Secretary Vilsack addressed a  
11 group of us concerning the GMO alfalfa  
12 decision, and he raised an issue that you are  
13 also raising. I am not quite sure how to  
14 respond to him. So, let me ask you.

15 He said non-organic farmers want  
16 the right to grow what they want to grow. I  
17 mean that is the argument he used with us.  
18 Therefore, he has to respect their right if  
19 they want to grow GMO alfalfa.

20 So, I have been thinking about  
21 that. And if you could help with some input  
22 on that, on what to say back to Secretary

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1 Vilsack on that matter, it would be helpful,  
2 I think, to a large number of us in this  
3 community.

4 MR. MAURICE ROBINETTE: Well,  
5 while I don't like the idea, I think if the  
6 product was labeled and everything that the  
7 product consumed was labeled, I would be happy  
8 with letting the consumer make the decision  
9 and the end result to that.

10 MR. MARAVELL: So, you are saying  
11 that the end product being, let's say, because  
12 consumers don't eat alfalfa, the end product  
13 being beef, let's say, in this case, that as  
14 long as it were all labeled, then the consumer  
15 could decide whether or not they wanted to buy  
16 --

17 MR. MAURICE ROBINETTE: Yes.

18 MR. MARAVELL: -- beef that had  
19 consumed GMO --

20 MR. MAURICE ROBINETTE: Yes.

21 MR. MARAVELL: -- alfalfa? I  
22 don't know if that gets to me where I need to

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1 be to convince the Secretary. But thank you.

2 CHAIR MIEDEMA: Okay. Thank you.

3 Fritzi Cohen is at the podium.

4 MS. COHEN: Hi. I'm -- excuse me.

5 CHAIR MIEDEMA: Sorry. One more.

6 Mabell Rivas is standing by.

7 MS. COHEN: I am Fritzi Cohen,  
8 speaking as a mere mortal and tax-paying  
9 citizen, but, also, a victim of pesticide  
10 drift on my oyster beds in Willapa Bay.

11 Supporting organic agriculture is  
12 not a new interest. In the eighties, the  
13 Tabard Inn had a market garden in Virginia  
14 that provided organic vegetables to our  
15 restaurant there and others in D.C. My  
16 husband's philosophy was no synthetics.

17 In a nutshell, I believe that my  
18 family, including my animals, have a right to  
19 good drinking water, to eat food that we know  
20 is free of pesticides, pharmaceuticals, not  
21 GMOed, and that the animals that we eat have  
22 been treated humanely, and that the fish are

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1 wild.

2 Our small farmers should not  
3 become endangered species. It is critical  
4 that organic regulations distinguish between  
5 large agricultural entities and small farms.  
6 The notion of the family farm is as American  
7 as apple pie.

8 The organic label should mean that  
9 the product is produced in ways that are  
10 compatible with organic principles. That is,  
11 adhering to practices that restore, maintain,  
12 and enhance ecological harmony.

13 We know maintaining integrity is  
14 not as uncomplicated as it should be. If the  
15 consuming public cannot trust the organic  
16 label, then there is no point in having it.

17 That is why, as USDA and the NOSB  
18 consider amendments to the soil and additives  
19 to products, and I am sure there are other  
20 things, they must apply sound, independent  
21 science case by case. This is the only way to  
22 guarantee that decisions are consistent with

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1 the basic notion and science of what is  
2 organic.

3 I always knew that soil was  
4 everything, and that point was driven home  
5 when we started gardening at the Moby Dick  
6 Hotel and Oyster Farm. The soil in Virginia  
7 was very different from that in Nahcotta,  
8 Washington, but the method of building soil  
9 with natural nutrients and compost was very  
10 similar. What you put into the soil winds up  
11 in the crops that grow in the soil, winds up  
12 in the animals that eat those crops, winds up  
13 in the people that eat those animals, and,  
14 ultimately, winds up in everything.

15 And all of the pollutants that end  
16 up in our waters from agricultural runoff,  
17 storm water runoff, and direct pesticide  
18 application, which is happening, tons of  
19 pesticides that is too common all over the  
20 State of Washington, and which I have  
21 personally observed in Willapa Bay, and,  
22 basically, I think are likely to be in the

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1 fish, mollusks, and crustaceans that we  
2 consume.

3 Keeping carbon in the soil, rather  
4 than letting it escape into the atmosphere,  
5 makes for healthier crops and combats global  
6 warming.

7 The USGS has found pesticide  
8 residues in almost all of the rivers and  
9 streams in the United States. Maintaining  
10 soil free of pesticides is the only way to  
11 reduce pesticide runoff into our streams and  
12 rivers, and to --

13 CHAIR MIEDEMA: Thank you, Ms.  
14 Cohen.

15 MS. COHEN: Excuse me?

16 CHAIR MIEDEMA: Thank you very  
17 much.

18 MS. COHEN: All right. Well, I  
19 would like to just mention one thing because  
20 I haven't attended all of the things. But,  
21 you know, the President's Council found,  
22 basically, that the true burden of

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1 environmentally-induced cancers has been  
2 grossly underestimated. I think that, based  
3 on that, we really need to be very careful.  
4 It is time to go organic and save our planet  
5 and ourselves.

6 CHAIR MIEDEMA: Thank you.

7 (Applause.)

8 MS. COHEN: And I have something.

9 Where do I --

10 CHAIR MIEDEMA: Okay. Any  
11 questions for Ms. Cohen?

12 (No response.)

13 Thank you.

14 Okay. Mabell Rivas is at the  
15 podium. Margaret Wittenberg is standing by.

16 MS. RIVAS: I am Mabell Rivas,  
17 Certification Program Director of Pennsylvania  
18 Certified Organic.

19 First of all, I would like to  
20 thank the Livestock Committee for the changes  
21 that have already been incorporated into the  
22 document, based on the written comments that

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1 were submitted by the organic community a few  
2 weeks ago. I can see a few changes that were  
3 suggested by ACA that have already been  
4 incorporated.

5 I would also like to say, for the  
6 record, that we support this recommendation in  
7 general, as we feel that it does clarify many  
8 issues that are not clear in the pasture rule.

9 Today, instead of making specific  
10 comments, I would like to take this  
11 opportunity to suggest two general  
12 improvements to the process of making changes.  
13 We feel that these two process improvements  
14 will ensure the best possible outcome for all  
15 our stakeholders.

16 One process improvement is simply  
17 that we need more time to collect more  
18 comments from the industry. We support ACA's  
19 comments that points toward a more careful  
20 multi-step process, first, incorporating all  
21 NOSB recommendations into the pasture rule  
22 and, then, polishing a cohesive, integrated,

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1 new document for public written comments. And  
2 after receiving another round of comments,  
3 doing a final overall revision and presenting  
4 a final recommendation in the fall.

5 The main reason we suggest this is  
6 that the voice to be heard in response to the  
7 new overall system that is being proposed by  
8 this new document in its totality.

9 The other process improvement that  
10 we would like to see is a strong commitment to  
11 an economically-reasonable transition time for  
12 certified operators/corporations to build any  
13 needed new infrastructure.

14 The document incorporated specific  
15 measures as part of the rule, and being so  
16 specific ties adjustment to the operators'  
17 systems currently in place.

18 When talking about indoor and  
19 outdoor areas space requirements, for example,  
20 we are talking about potentially significant  
21 and expensive changes in infrastructure. It  
22 would be programmatic as well as unfair for a

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1 certifier to start enforcing these densities  
2 immediately without giving the existing  
3 operators a reasonable timeframe in which to  
4 make these changes. Some time for adjustment  
5 of a specific system that is already in place  
6 is absolutely necessary.

7 Thank you very much for  
8 considering these ideas.

9 CHAIR MIEDEMA: Thank you.

10 Mac?

11 MR. STONE: How do you communicate  
12 with your growers on an issue like this and  
13 get info back and forth, but, then, also, a  
14 final recommendation to them?

15 MS. RIVAS: Well, in Pennsylvania,  
16 the vast majority of our membership is  
17 actually Amish farmers. So, the way that we  
18 communicate is actually very retro, I would  
19 say. We use mail. Our process includes a lot  
20 of handwritten forms, to be honest. So, it  
21 does take time to communicate these changes  
22 and receive information back and their

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1 suggestions and comments. And that is why we  
2 feel that there should be more time given to  
3 them.

4 CHAIR MIEDEMA: Thank you. Thank  
5 you, Ms. Rivas.

6 MS. RIVAS: Thank you.

7 CHAIR MIEDEMA: Margaret  
8 Wittenberg is up next. Richard Reese is  
9 standing by. Thank you.

10 MS. WITTENBERG: Okay. Good  
11 afternoon, and thank you for the opportunity  
12 to provide comment today.

13 My name is Margaret Wittenberg,  
14 and I am the Global Vice President of Quality  
15 Standards and Public Affairs for Whole Foods  
16 Market.

17 As a former retail representation  
18 on the National Organic Standards Board from  
19 1995 to 2000, I highly appreciate the enormous  
20 amount of time and dedication it takes for you  
21 to fulfill your duties as Board members, as  
22 well as I highly regard the public national

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1 organic standards development process,  
2 including the opportunity for the new material  
3 petitions process for the National List and  
4 the accompanying five-year Sunset review.  
5 Accordingly, I would like to offer a couple of  
6 suggestions to the Board.

7 First and foremost is a reminder  
8 that everything you do goes far beyond a  
9 philosophical discussion. Each of your votes  
10 highly impacts real people's lives and  
11 livelihoods as well as the continued  
12 opportunity for the organic industry to  
13 develop and learn as it goes along.

14 I know how difficult these  
15 decisions can be to make, especially on topics  
16 that may or may not be in someone's particular  
17 expertise. Ask any former NOSB member. You  
18 will be learning a lot of new information  
19 while on the Board on topics you never thought  
20 you would have to know.

21 So, thorough listening and  
22 reading, asking questions, and being totally

1 engaged is critical. A lively Board  
2 discussion during the meeting, includes each  
3 of you, is one of the most important parts of  
4 the process, and dare I say can even be more  
5 important than ending on a prescribed time.

6 While it can sometimes seem  
7 intimidating being on a stage, so to speak, it  
8 is often the one who knows the least about a  
9 subject that comes up with the best questions  
10 that can be beneficial for the group.

11 Good decisionmaking requires a  
12 step beyond your own personal opinions,  
13 utilizing many filters within your decision  
14 matrices, including stepping back and looking  
15 at the big picture, and remembering we want to  
16 have more land, animals, and products being  
17 developed as organic rather than the  
18 alternative.

19 This includes making sure  
20 decisions are reasonable, not overly  
21 burdensome, scale-neutral, rather than  
22 judgmental, as well as honoring that there are

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1 many ways to achieve a desired outcome.

2 Voting in a Sunset review also  
3 includes the understanding that the industry  
4 is ever evolving with continued research and  
5 experimentation, with the intent that, when  
6 possible, it will provide new or additional  
7 avenues and tools that could mean that along  
8 the way that few materials wouldn't need to be  
9 relisted or, on the other hand, underscore why  
10 a material needs to be continued. In other  
11 words, the five-year review provides the time  
12 for that continued evolution of the organic  
13 industry to occur.

14 I appreciated Katrina's material  
15 guidelines presentation yesterday which  
16 highlighted both the established process for  
17 determining the classification material and  
18 determining synthetic and non-synthetic that  
19 Board members are expected to follow to ensure  
20 consistency in the standardization process.

21 I can ensure you that these definitions and  
22 procedures which we former NOSB members helped

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1 establish many years ago were formed with a  
2 great deal of effort and deliberation, using  
3 the expertise many of us had in standards and  
4 process development.

5 There is something to be said for  
6 maintaining and honoring foundational work.  
7 It provides assurance and consistency for all  
8 stakeholders.

9 Thank you very much.

10 CHAIR MIEDEMA: Thank you.

11 Any questions for Margaret  
12 Wittenberg?

13 (No response.)

14 Thank you.

15 MS. WITTENBERG: Thank you.

16 CHAIR MIEDEMA: Richard Reese is  
17 up next. Keith Stavrum is standing by.

18 MR. REESE: I wanted to address  
19 the question about Secretary Vilsack, and I  
20 apologize for my sarcasm. But perhaps the  
21 Secretary would like to be reminded that wind  
22 is a vector of GMO contamination in crops.

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1 I don't feel that there has been  
2 enough science about using GMO in the first  
3 place. What about runoff? What about the  
4 effect on fish? What about the effect of our  
5 own digestive bacteria? We just don't enough  
6 to have it planted out.

7 And I am chagrined and quite  
8 depressed that there is so much GMO crop in  
9 the world today. So, one of my concerns about  
10 the use of GMO currently, the way it is being  
11 done, is its effect on small communities.  
12 Small communities have a delicate economic  
13 tapestry that is shredded by the predatory  
14 business and legal practices of companies like  
15 Monsanto. There may be other countries who  
16 are involved in GMO dissemination, but I don't  
17 know what they are.

18 There is a book that was written  
19 by two guys, Miller and -- what's his name? --  
20 Conko, I think it was. It was called The  
21 Frankenfood Myth. And I quote here, "USDA's  
22 rules for organic production which bar the use

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1 of genetically-engineered crops are based on  
2 process, not outcomes. In other words, as  
3 long as organic growers adhere to permissible  
4 practices and do not intentionally plant  
5 genetically-engineered seeds, unintentional  
6 cross-pollination by genetically-engineered  
7 plants does not cause those crops to lose  
8 their organic status."

9 In other words, it doesn't matter  
10 about the integrity of Nature. It only  
11 matters if we can follow the rules and if we  
12 can create the rules to follow in the first  
13 place.

14 In the recent tsunami and  
15 earthquake disaster, the amount that a person  
16 could, of radiation exposure they could handle  
17 was raised the morning of the disaster from  
18 100 millirems to 250 millirems. So, that is  
19 a lot of what is happening with these large  
20 corporations whose predatory practices in  
21 small communities, you know, a small farmer  
22 cannot go up against Monsanto. They don't

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1 have the money. They don't have the time.

2 They would like to do it. They  
3 would like to be able to think that they could  
4 win their case against Monsanto, but can they  
5 really? It's tough. It's expensive. Often,  
6 it just shreds their ability to continue doing  
7 business.

8 I I hope that you are hearing the  
9 same dang thing all over the country, that  
10 consumers are concerned about food safety;  
11 that, as citizens, we have lost faith in the  
12 government oversight of GMOs.

13 I mean, when GMO first came along,  
14 I ignored it, you know. It is too crazy for  
15 words. It is not going to happen. But here  
16 it happened.

17 And I feel that labeling is a  
18 short-term solution to give consumers some  
19 sort of voice, but in the long-run I would  
20 like to see GMOs withdrawn from planting in  
21 the first place.

22 CHAIR MIEDEMA: Thank you.

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1 MR. REESE: Thank you.

2 CHAIR MIEDEMA: Thank you.

3 Any questions?

4 (No response.)

5 All right.

6 MR. REESE: Okay. So, in answer  
7 to the previous question about Secretary  
8 Vilsack --

9 CHAIR MIEDEMA: I'm sorry, I don't  
10 think there was a question. Was there a  
11 question posed to Mr. Reese?

12 MR. MARAVELL: Yes, if you have  
13 got something that could elucidate that for  
14 us, that would be helpful, because he said all  
15 farmers have the right to plant what they  
16 want, whether you an organic or non-organic  
17 farmer.

18 I might add, I don't think that  
19 Secretary Vilsack feels that this issue is  
20 over.

21 CHAIR MIEDEMA: Nick, can you  
22 please ask your question? Would you mind?

1 MR. REESE: Thank you.

2 MR. MARAVELL: So, what do we have  
3 to go back with him on that?

4 MR. REESE: Well, my concern is  
5 that there is not enough science, that the  
6 decision to promote and plant out GMO is an  
7 economic-based decision, rather than a  
8 decision which promotes the integrity of  
9 nature.

10 So, thank you. Thank you.

11 (Applause.)

12 CHAIR MIEDEMA: Keith Stavrum is  
13 at the podium, and Pat Kane is standing by.

14 MR. STAVRUM: Hello. My name is  
15 Keith Stavrum. I am the President of the  
16 Independent Shellfish Growers of Washington  
17 State.

18 We don't belong to the Pacific  
19 Coast Shellfish Growers Association, which are  
20 a big industry that sprays poisons all over  
21 the waters in this State.

22 One of the things that I am here

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1 to talk about is the integrity of the tilth,  
2 which I support totally. You know, we had a  
3 problem in this State where they called it  
4 this invasive grass, spartina, and all of our  
5 members mowed this grass, got rid of this  
6 grass. We didn't use any poisons whatsoever.

7 But there was this wonder chemical  
8 called Amazapeer that was sold and said, look,  
9 Washington State, USDA, all of the Pacific  
10 Coast oyster growers, let's spray and kill  
11 this horrible grass, which is loved on the  
12 East Coast, by the way.

13 Well, it turns out that in 2008  
14 Federal EPA, actually, and I have the document  
15 and I have handed these out to you, the  
16 document states, you know, to remove estuary  
17 and marine from applications of this chemical.  
18 This was in 2008, and there was a loophole in  
19 the law that says, hey, you've got 16 months  
20 to get rid of this stuff, though, if you  
21 already have it.

22 And each and every one of those

1 entities I talked to -- and in the back you  
2 will see -- all over Puget Sound, Hood Canal,  
3 this whole State, all the waters, the Nature  
4 Conservancy, everybody sprayed this chemical.

5 These people have done something  
6 that none of us do as the independents. We  
7 have 327 members.

8 So, I am kind of here to piss in  
9 my corner, to tell you the truth. I would  
10 like to be up here and let you know, if you  
11 are going to do something with shellfish,  
12 whether it be clams, geoducks, whatever, you  
13 need to deal with us small farmers, the ones  
14 that don't poison everything, the ones that  
15 get double the price for our stuff. Our  
16 shellfish don't take like mud.

17 It isn't Taylor Industry, Northern  
18 Oyster, Coast Hilton. These people will  
19 infiltrate, and I am afraid of this, the  
20 Board, as they did for the people of Puget  
21 Sound, and start giving fundraisers. And in  
22 doing the fundraising, all of a sudden,

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1 they're loved and hugged and everything.

2 The integrity of the tilth has  
3 something to do with something that goes back  
4 to the farmers. I am going to address a  
5 question that you kept asking. Let me say  
6 this: years ago, if you stole something, you  
7 know, you might have got beat up or something,  
8 you know, hundreds of thousands of years ago.  
9 But somewhere along the line someone said  
10 we're going to cut your arms off now. If you  
11 steal something, we're cut your arms off.

12 So, if you go back to the  
13 beginning of time, nobody had GMOs. When GMOs  
14 come, that's the problem. We have to remember  
15 it that way. Answer it that way to the man.

16 But, you know, to sum this thing  
17 up, I want to make sure that we are involved  
18 in any aquaculture. And there is an MPDS  
19 permit that comes out where people actually  
20 go, hey, you know, we're going to spray  
21 poisons in the waters of Washington. If  
22 anyone has applied for that in the last five

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1 years, they should have nothing to say to this  
2 tilth Board.

3 But, again, to get back to the old  
4 farmers, say two farmers are there. One has  
5 a bull. "Hey, you raise my bull, and we are  
6 going to split it in two when it comes up."  
7 They don't line it up and cut it down the  
8 middle with two legs over here and two legs  
9 over here, and, you know, the bull back end  
10 and the front end. They saw it down the  
11 middle and they do it equally.

12 So, let's make sure we take care  
13 of that, and the integrity of the tilth is  
14 with a handshake, and we keep it. All right?

15 Thank you.

16 (Applause.)

17 CHAIR MIEDEMA: Thank you.

18 MR. STAVRUM: Any questions?

19 CHAIR MIEDEMA: Any questions for  
20 Mr. Stavrum?

21 (No response.)

22 Pat Kane is next, and Nicole Dehne



1 is standing by.

2 MS. KANE: Thank you all. I am  
3 Pat Kane. I am the Coordinator of the  
4 Accredited Certifiers Association.

5 I would just like to briefly thank  
6 you for all your work.

7 I would like to provide comment on  
8 the CACC discussion document regarding NOP  
9 oversight of the Materials Review  
10 Organization. ACA did provide written  
11 comments. They were posted. So, I hope you  
12 have had a chance to look at them.

13 In 2010, ACA had a working group  
14 that did prepare a white paper regarding  
15 materials review, and this identified many of  
16 the same issues that the CACC discusses.

17 In our comments, we stated that we  
18 believe that the development of a separate  
19 accreditation scope is a long-term process and  
20 should not be the primary focus at this time.  
21 We believe that, prior to the establishment of  
22 the scope of accreditation for review of

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1 materials, the National Organic Program should  
2 provide detailed guidance describing the  
3 appropriate process and procedures desired for  
4 review of materials.

5 We believe that increased  
6 enforcement oversight by the National Organic  
7 Program of all organizations reviewing  
8 materials is needed prior to the establishment  
9 of the scope of accreditation for reviewing  
10 materials.

11 Our members have stated that  
12 accreditation auditors had generally not  
13 reviewed the materials review process or  
14 procedures with the same scrutiny that the  
15 certification process receives.

16 We do believe that there are two  
17 distinct types of materials review  
18 organizations, ones such as OMRI, WSDA, who  
19 conduct material reviews for manufacturers and  
20 publish a list of materials, and, then,  
21 accredited certifying agents who conduct  
22 materials review as an integral part of the

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1 certification process at the request of the  
2 client, but do not publish a list of approved  
3 materials.

4 It is also noted in our comments  
5 that in Europe, it is quite common for  
6 certification agencies to conduct a review of  
7 materials on behalf of a manufacturer and  
8 publish a list. So, we have got all kinds of  
9 schemes going on.

10 ACA believes that ACAs and  
11 organizations that review materials  
12 independent of the certification process  
13 should not be considered similar when it comes  
14 to regulation. ACAs review materials for use  
15 by a specific client in a specific situation  
16 rather than provide a blanket product approval  
17 for a manufacturer.

18 We do believe that all forms of  
19 review programs should receive scrutiny. That  
20 is not to except ACAs that review for clients.

21 We encourage the formation of a  
22 task force or working group with broad

1 stakeholder participation, including the  
2 National Organic Program staff, the National  
3 Organic Standards Board, ACAs, non-  
4 governmental organizations, and  
5 representatives of the input sector --

6 CHAIR MIEDEMA: Thank you. Go  
7 ahead.

8 MS. KANE: -- should be formed to  
9 assist with the further development of this  
10 process.

11 CHAIR MIEDEMA: Thank you very  
12 much.

13 Any questions for Pat Kane? Joe  
14 Dickson?

15 MR. DICKSON: Thank you, Pat.

16 Just a quick clarifying question.  
17 I think I understand your comments. Do you  
18 have a position on whether non-ACA materials  
19 review organizations should be accredited in  
20 the long-term picture?

21 MS. KANE: I think our group felt  
22 that, yes, they should be. The concern with

1 our group was that ACAs who review materials  
2 for clients, who may choose not to proceed  
3 with a scope of accreditation, how would that  
4 affect the review system? They don't feel  
5 that the review of materials can be taken out  
6 of the certification process. So, that was  
7 our concern.

8 CHAIR MIEDEMA: Mac Stone?

9 MR. STONE: Pat, do you have any  
10 idea or guesstimate how many lists there are  
11 floating around the among the ACAs or how many  
12 thousands of products are floating around  
13 being used in this world?

14 MS. KANE: Many.

15 (Laughter.)

16 Since the lists aren't public -- I  
17 mean every certifier reviews materials. So,  
18 the assumption is every certifier has a list.  
19 But, no.

20 CHAIR MIEDEMA: Thank you.

21 MS. KANE: Thank you all.

22 CHAIR MIEDEMA: Nicole Dehne is

1 next.

2 Carrie Little, you are standing  
3 by.

4 MS. DEHNE: Hi. My name is Nicole  
5 Dehne. I am the Certification Administrator  
6 for Vermont Organic Farmers, and I am  
7 representing 580 certified organic farms and  
8 processors today. And I appreciate the  
9 opportunity to speak, and I am going to try to  
10 be quick.

11 It is clear that the NOSB feels,  
12 as we do, that animal welfare is an essential  
13 component to organic regulations, but it not  
14 a regulation that we feel that should be  
15 rushed.

16 And we suggest the following  
17 modifications to the current proposed  
18 regulations. I want to say I was able to  
19 scratch out some of my modifications due to  
20 changes that the Committee already made. So,  
21 I want to say thanks for that.

22 But we recommend more specific

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1 language regarding minimizing pain during  
2 dehorning cattle. We suggest a requirement  
3 for using local anesthetics when dehorning  
4 calves older than 12 weeks.

5           And in regards to stocking rates,  
6 it is important to assure the consumer that  
7 organic regulations require animals to have  
8 more than the minimum required space. So, we  
9 recommend increasing stocking rates for  
10 poultry and small grower pigs to require more  
11 space that is the minimum of what is  
12 considered acceptable.

13           We also believe all beak trimming,  
14 in addition to beak removal, should be  
15 prohibited. And currently, all of our VOF-  
16 certified poultry producers do not practice  
17 beak trimming of any kind.

18           As far as the welfare handling,  
19 transport, and slaughter standards, we are  
20 concerned about the practicality of these.  
21 There is a shortage of slaughter facilities in  
22 Vermont, and it is not a problem that is

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1 unique to our State. Slaughterhouse owners  
2 have so many customers to choose from that  
3 they often don't see the value in getting  
4 certified for a few organic producers that  
5 need them to be certified.

6 If we make the regulations  
7 unachievable or too burdensome, we are afraid  
8 that our three slaughterhouses that are  
9 currently certified will decide to drop,  
10 leaving certified livestock producers in a  
11 pretty serious situation. We suggest working  
12 with maybe the USDA and state inspectors  
13 already present in the facilities to audit  
14 animal treatment, but we worry without a  
15 comprehensive approach that slaughterhouses  
16 will decide not to pursue organic  
17 certification due to an overly-burdensome  
18 system of verification.

19 And we do not support a  
20 recommendation that expands the number of  
21 unreviewed or ill-defined accessory nutrients  
22 in organic food. And we support the Joint

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1 National Organic Coalition and Cornucopia  
2 position in regards to those materials.

3 And finally, we support a limited  
4 extension of the use of streptomycin and  
5 tetracycline for management of fire blight in  
6 organic orchards. For our producers,  
7 successful and profitable organic apple  
8 production in Vermont requires access to, and  
9 occasional use of, those products. But we do  
10 support the National Organic Coalition's  
11 phaseout strategy for those materials.

12 MR. MILLER: Thank you.

13 Any questions? Joe Dickson?

14 MR. DICKSON: Nicole, you said  
15 that some of the stocking rates were lower  
16 than VOF would like to see them. I am  
17 wondering if you can tell us which ones  
18 specifically --

19 MS. DEHNE: Yes.

20 MR. DICKSON: -- and if you have  
21 suggestions for specific values.

22 MS. DEHNE: Specifically, for

1 poultry, we thought that Cornucopia had some  
2 good details as far as large the stocking rate  
3 should be and, also, for small grower pigs.  
4 Those are the ones specifically we thought  
5 were too small.

6 CHAIR MIEDEMA: Mac Stone? Sorry,  
7 one more.

8 MR. STONE: Nicole, what percent  
9 of your membership direct markets and has  
10 direct contact for communication about how  
11 their animals are raised?

12 MS. DEHNE: I would say the  
13 majority of our livestock producers direct  
14 market, and we have about 200 dairy and maybe  
15 50 livestock producers, or maybe a little bit  
16 more.

17 CHAIR MIEDEMA: Thank you.

18 Carrie Little, you're up next.

19 Julianne Lamsek is standing by.

20 MS. LITTLE: Greetings. My name  
21 is Carrie Little, and I come on behalf of the  
22 ecosystems of two farms, Mother Earth Farm, a

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1 project of Emergency Food Network, which grows  
2 75 tons of fresh produce annually for hunger  
3 organizations here in Pierce County,  
4 Washington.

5 In addition, I go home to a farm  
6 called Little Earth, and we just became  
7 certified organic as of a week ago.

8 (Applause.)

9 We raise pasture poultry, sheep,  
10 pigs, and bees, as well as mixed vegetables,  
11 berries, hops, and fruit trees there.

12 Thank you for taking the time to  
13 hear our voices, especially of those on the  
14 ground deeply involved in the actual work of  
15 organic farming. It is our hope that our  
16 collective voices impact your decisionmaking.

17 I have four areas of concern  
18 regarding possible changes. First, please do  
19 not weaken standards in regards to animal  
20 welfare where stronger rules about allowing  
21 animals on pasture is needed.

22 Second, please do not weaken

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1 standards allowing human waste in organic  
2 farms. Until our culture learns to value  
3 water usage and respect the end result, we  
4 can't have contamination of heavy metals or  
5 pharmaceuticals in our soils.

6 Third, we would like to see a much  
7 stronger emphasis on the use and sourcing of  
8 local materials. The petroleum factor should  
9 be a top consideration when enforcing the use  
10 of certain materials.

11 I find it troubling that Chilean  
12 nitrate is an approved material when there are  
13 local sources of nitrogen that are not  
14 strongly encouraged.

15 And lastly, I would like to speak  
16 to the plight of the seed. It is clear the  
17 battle lines are drawn. Multinational  
18 corporations like Monsanto are aiming to  
19 control the seed supplies of food.

20 Seed savers like myself are  
21 fearful for what is in store. GMOs, once  
22 released in nature, will never go away. So

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1 critical is your job in not allowing  
2 contamination of GMOs, that the entire food  
3 web depends on this decision. If we falter  
4 here, we will fail as stewards of the earth  
5 and as members of this planet.

6 Thank you.

7 CHAIR MIEDEMA: Thank you, Ms.  
8 Little.

9 Any questions?

10 (No response.)

11 Thank you.

12 (Applause.)

13 Julianne Lamsek is next. Dave  
14 DeCou is standing by.

15 Dave, are you here?

16 (No response.)

17 Jim Koan is standing by.

18 MS. LAMSEK: I am Julianne Lamsek,  
19 speaking as a concerned consumer.

20 I am here to comment on animal  
21 welfare recommendations for poultry and swine.  
22 I understand the pressure you are facing from

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1 the nation's largest livestock producers to  
2 make organic production as cost-efficient as  
3 possible. At the same time, I expect that all  
4 organic livestock be treated humanely.

5           When I buy organic eggs or  
6 chicken, I expect those hens to spend a good  
7 portion of their lives outdoors, foraging a  
8 vegetated range with sunshine. When they are  
9 indoors, I expect them to be in a healthy  
10 environment, not wreaking with ammonia. I  
11 expect hogs to be able to roam about freely  
12 and socialize.

13           It is hard for me to understand  
14 why the space recommendations are so low,  
15 especially compared to the standards of other  
16 animal welfare certifiers.

17           Standard factory farming practices  
18 in this country are inhumane. It is not  
19 acceptable for organic standards for the  
20 living conditions of poultry and swine to be  
21 a little above the average conventional except  
22 for organic feed.

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1           For these reasons, I advocate at  
2           least two square feet per bird indoors for  
3           layers and broilers. I am aware of the EU  
4           standard for 43 square feet, and I am dismayed  
5           that the United States is so far behind. I  
6           advocate for at least five square feet per  
7           bird outside, since Organic Valley recommends  
8           it as feasible.

9           I am pleased the NOSB is  
10          attempting to control ammonia levels, but the  
11          25 parts per million level cited in the  
12          recommendation as high should not be  
13          acceptable at any time. Chronic exposure at  
14          20 parts per million affects the health and  
15          welfare of chickens.

16          Research shows a precautionary  
17          guideline for prolonged ammonia exposure at 10  
18          parts per million. So, I believe farm plans  
19          must demonstrate control at this precautionary  
20          level.

21          I ask the Livestock Committee to  
22          adopt these recommendations as the highest

1 animal welfare standards in the nation. They  
2 are what I and other organic consumers want  
3 and expect.

4 CHAIR MIEDEMA: Thank you.

5 Mac?

6 MR. STONE: I hope this comes off  
7 right. So, as a consumer, I raise eggs on my  
8 farm, and if I told you that the chickens that  
9 are roaming free and in their grass all the  
10 time, that if they scratch through the cow  
11 manure and eat the larvae of insects from  
12 that, is that repulsive to you or a good idea?

13 MS. LAMSEK: That is not  
14 necessarily repulsive to me, if it is a humane  
15 environment that those chickens are existing  
16 in, and the cattle are also in a sustainable  
17 environment.

18 MR. STONE: Which is the case, but  
19 the customer that I told that to has never  
20 bought an egg from me again.

21 (Laughter.)

22 CHAIR MIEDEMA: Thank you.



1 MS. LAMSEK: Thank you.

2 CHAIR MIEDEMA: Jim Koan is next.  
3 Jeremy Shapely is standing by.

4 MR. KOAN: I have been here all  
5 day. I am tired. I learned a lot. I know  
6 you have learned a lot, more than I have. My  
7 brain is slow.

8 I learned one important thing  
9 today, and that is the people that get up here  
10 and they talk fast, they are talking a foreign  
11 language. I can't integrate it anymore. So,  
12 I hope you can integrate what I am saying.  
13 So, I am going to talk really slow.

14 I am an apple grower in Michigan.  
15 I should be home right now on my farm trying  
16 to grow apples and fighting scab. It has been  
17 raining about two weeks.

18 But I decided I needed to come  
19 here and talk to you and tell you my story  
20 because, if you let streptomycin sunset, I  
21 won't have a farm to fight apple scab with  
22 anyhow.

1                   So, I grow about 150 acres of  
2                   apples. That is about 2.5 million pounds. I  
3                   also grow some crops.

4                   Barry, I retail to local citizens  
5                   as well as wholesale. We process, and I even  
6                   do a few hogs and greenhouse.

7                   I have been growing apples for 35  
8                   years, 20 years conventionally, the last 15  
9                   years organically.

10                  I worked with Michigan State  
11                  University for years, and a plant pathologist,  
12                  and I am here to tell you that we in the East,  
13                  North, and South cannot grow apples without  
14                  antibiotics sometimes. If you understand the  
15                  science, if you understand the biology and how  
16                  this works, once in a while, we have to have  
17                  that or we are going to lose our crop.

18                  If we lose our crop, we are also  
19                  going to lose our trees. As a businessman, it  
20                  is impossible to recover from that. It is  
21                  just a given that we will phase out of the  
22                  business and we go into something else.

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1                   In the last six years, I probably  
2                   used the streptomycin three times. We use a  
3                   computer model that tells us how fast that  
4                   biology is building, that bacteria, and, then,  
5                   it predicts by plugging in weather exactly  
6                   when you are going to have an infection and if  
7                   you need to go in and spray that, so that you  
8                   are just not whimsically spraying this.

9                   There is a lot of science out  
10                  there that tells you that it is not in the  
11                  fruit and that it is not traceable. And  
12                  there's a lot of people telling you a lot of  
13                  things that aren't true.

14                  The most important thing to  
15                  remember here is that the growers on the East  
16                  Coast, Central, South regions, without  
17                  antibiotic, are going to have to get out of  
18                  the business over time.

19                  Any questions?

20                  (No response.)

21                  CHAIR MIEDEMA: Thank you, sir.

22                  (Applause.)

1                   Jeremy Shapely is next. Lauren  
2 Yoder is standing by.

3                   Lauren, are you here?

4                   (No response.)

5                   Luis Monge is standing by.

6                   MR. SHAPELY: Hi. As you guys  
7 have heard, my name is Jeremy Shapely, and I  
8 am going to speak real fast.

9                   I am a wine importer, and I have  
10 been such since 2003. I currently import  
11 conventional wines, wines made from organic  
12 grapes, and 100 percent organic wines.

13                  My largest supplier is the world  
14 leader in no-added-sulfate, organic wines.  
15 They also are the first organic certified  
16 winery in the world. The 2010 production saw  
17 384,000 cases of wine globally. In 2012, we  
18 should see about a 30 percent increase on  
19 that. So, by standard wine volumes, they are  
20 probably considered a mid-sized winery.

21                  Although most folks in the wine  
22 industry will tell you that there is a growing

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1 market in the U.S. for all three of these wine  
2 categories, the U.S. is now the No. 1 wine  
3 consumer in the world.

4           There are wine drinkers who could  
5 care less about any organic farming or  
6 production methods. There are consumers who  
7 like the idea of supporting pesticide-free  
8 products through their purchasing habits,  
9 whatever is convenient to them. And there are  
10 consumers who 100 percent solely want to  
11 consume 100 percent organic products, which is  
12 largely where my consumers fall.

13           Although we have seen the organic  
14 industry and the FDA struggle to end up where  
15 we are today with organic labeling, I believe  
16 that the labeling rules provided today in the  
17 wine industry provide truth in labeling for  
18 wine drinkers for the wines that fall into  
19 these three categories.

20           The allowance of wine made with  
21 organic grapes to be labeled as such by TTB on  
22 the front and back of their labels ensures

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1 that any brand-owner who wants their consumer  
2 to know that their wines are made from organic  
3 produce can very easily do so.

4 And we have seen in the farming  
5 practices in both this country and throughout  
6 the world, the organic farming practices that  
7 is, explode, and it is downright false to  
8 imply that the current FDA labeling standards  
9 in wine do anything to discourage organic  
10 grape farming. If anything, they are  
11 encouraging the explosion, one that I, as a  
12 wine importer, see daily with new organic  
13 wineries approaching me trying to get  
14 importation and distribution into the U.S.

15 Some have argued that the  
16 disallowance of SO2 in organic winemaking has  
17 held the organic wine industry back. But as  
18 someone who works daily beside retailers and  
19 consumers, I wholeheartedly disagree with this  
20 assertion.

21 After eight years of talking to  
22 wine drinkers, I believe the consumers who buy

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1 organic milk, organic meat, and organic  
2 produce, then, buy conventional beer and wine  
3 because they somehow believe all wine and beer  
4 to be inherently organic. Why do they believe  
5 this? I believe this is because the FDA does  
6 not require ingredient labeling on either beer  
7 or wine. So, many consumers have no idea that  
8 synthetic or artificial ingredients are being  
9 added to their beer and wine.

10 They are always surprised to know  
11 that there is oftentimes much more added to  
12 beer and wine other than fermented grapes,  
13 hops, and malt. If consumers could see what  
14 else was in their wine and beer besides grapes  
15 and barley, I believe that the organic wine  
16 industry would mirror that of the organic milk  
17 industry, which still definitely booming.

18 All of us in this room have seen  
19 the organic industry evolve over the past  
20 couple of years and seen large commercial  
21 interests trying to weaken the labeling  
22 standards in an attempt to gain more of this

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1 growing organic market share without having to  
2 change their farming or production practices  
3 to follow organic guidelines.

4 But other consumers --

5 CHAIR MIEDEMA: Thank you, Mr.  
6 Shapely.

7 MR. SHAPELY: Okay. Thank you  
8 much.

9 CHAIR MIEDEMA: Any questions?

10 (No response.)

11 MR. SHAPELY: Thank you.

12 CHAIR MIEDEMA: Luis Monge, you  
13 are up next.

14 Dain Craver is standing by.

15 MR. MONGE: Good afternoon.

16 She is Penelope Pineapple. I am  
17 Luis Monge. We are both from Costa Rica.

18 (Laughter.)

19 She is obviously an organic  
20 pineapple.

21 I am the Manager of the Organic  
22 Program at Dole Fresh Fruit International.

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1 Today I am not only representing my company,  
2 but, also, the organic pineapple industry from  
3 my country.

4 We have read the Supplemental  
5 Information Report on the use of ethylene gas  
6 and we strongly support such document in most  
7 of its conclusions and, also, would like to  
8 provide the following information:

9 We agreed when the report when it  
10 stated that controlled flower induction allows  
11 for the best possible management of  
12 plantations and results in better production,  
13 taking the concept of management to its  
14 broadest meaning, which includes, among  
15 others, pest management, decision management,  
16 fertilization, culture practices, et cetera.

17 We also support the report on its  
18 main conclusion to this question. It says,  
19 "It can be concluded that the use of ethylene  
20 gas remains important to organic pineapple  
21 production."

22 In fact, EcoLogica, a

1 certification agency for Costa Rica, has  
2 stated on its full-length comment that  
3 ethylene has shown to be indispensable for  
4 organic pineapple production.

5 About the current use pattern for  
6 ethylene, Costa Rica is by far the largest  
7 pineapple supplier for the U.S. market. It is  
8 a good example for small, medium, and large  
9 production entities producing high-quality  
10 organic pineapples for the international  
11 markets.

12 In all the scales of production,  
13 the use of ethylene is, without a doubt, a  
14 major need, and it represents less than 2  
15 percent of the total production cost. What  
16 the farmers cannot afford is the production of  
17 organic pineapples without an induction agent.

18 About the topic of other  
19 alternatives, we fully concur with the report  
20 when it stated that the commercially-available  
21 treatments worldwide have not changed since  
22 the 1999 TAP review for ethylene gas. The

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1 alternative methods have not proven to be  
2 efficient and/or consistent.

3 The report mentioned an  
4 investigation made in Taiwan with a totally  
5 different pineapple cultivar and under  
6 conditions that did not reflect the reality on  
7 the fields that supplied the organic  
8 pineapples for the U.S. consumers.

9 Please take into account that,  
10 according to this investigation, the  
11 alternative to ethylene will mean that a small  
12 grower of 1 hectare will need 1 million pounds  
13 of ice during this flowering.

14 Finally, we want to state that,  
15 from the farmers' point of view, successful  
16 organic pineapple cultivation is not possible  
17 at the present time without the use of  
18 ethylene.

19 Therefore, we, the Costa Rican  
20 organic pineapple industry, Miss Penelope  
21 Pineapple, and myself respectfully ask the  
22 NOSB to continue the releasing of ethylene gas

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1 under 205.601(k) on the National List.

2 Thank you.

3 CHAIR MIEDEMA: Thank you.

4 Tina and, then, Barry.

5 MS. ELLOR: Do you have some  
6 numbers at your disposal? It would be really  
7 helpful. What percentage of organic pineapple  
8 producers in Costa Rico use ethylene? And  
9 what percentage of the import market are Costa  
10 Rican pineapples to the U.S.?

11 MR. MONGE: Okay.

12 MS. ELLOR: Do you have that?

13 MR. MONGE: Yes. One hundred  
14 percent of the organic pineapple producers in  
15 Costa Rica. It doesn't matter the scale.  
16 From 1 hectare to 500 hectares, they use  
17 ethylene gas for the induction of flowering.

18 And Costa Rica represents,  
19 according to one report from the United  
20 Nations in 2002, more than 82 percent of the  
21 organic supply of pineapple for the U.S.  
22 market. And it was in 2002 when the

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1 production in Costa Rica was still too low.

2 CHAIR MIEDEMA: Barry?

3 MR. FLAMM: Luis, you made the  
4 remark that there was no reasonable  
5 alternatives at this time, suggesting perhaps  
6 that you see something down the road. Could  
7 you elaborate on that?

8 MR. MONGE: Yes. It was a  
9 previous question to Mr. David Lively today,  
10 asking what other alternative has been proven  
11 in Costa Rica, a list. We tried everything.  
12 And you have to read the public comment from  
13 Gabriella Soto from EcoLogica because it is  
14 really in there.

15 There is an experience of two  
16 American ladies opening organic pineapple  
17 farms in Costa Rica, and they tried everything  
18 because it was previous to the approval of the  
19 ethylene and the NOP. And they failed. They  
20 are no longer organic farmers there.

21 They tried the cold-water  
22 treatments because it is nothing new, by the

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1 way. It is there since several years now.  
2 So, they tried the cold-water treatment. They  
3 tried a horse urine, everything, almost  
4 everything, and they failed.

5 CHAIR MIEDEMA: Yes, real quick.  
6 We are running -- Barry, we do have one other  
7 Board member that has a question, too. So, go  
8 ahead.

9 MR. FLAMM: So, I guess I  
10 misinterpreted your comments. So, from you  
11 have just said, you don't see a viable  
12 alternative?

13 MR. MONGE: No. At this point,  
14 no, not today.

15 CHAIR MIEDEMA: Thank you.

16 No? Okay. All right.

17 MR. MONGE: Thank you for the  
18 opportunity to speak on behalf of so many  
19 people that couldn't put their comments in  
20 front of you today.

21 And it says Gibberellic acid. We  
22 will talk about Gibberellic acid in Georgia

1 with Bobby Banana.

2 (Laughter.)

3 CHAIR MIEDEMA: Thank you.

4 Dain Craver is coming to the  
5 podium. Diane Dempster is standing by.

6 Diane, are you here?

7 (No response.)

8 Robert Beauregard? Robert  
9 Beauregard, are you here?

10 MR. BEAUREGARD: Yes, I'm here.

11 CHAIR MIEDEMA: Thank you.

12 Mr. Craver, please proceed.

13 MR. CRAVER: Okay. Thanks. I  
14 appreciate you guys letting me talk today.

15 I think it was great that we put  
16 together this national Board because there  
17 were so many times when some states would have  
18 regulations and other states wouldn't, and it  
19 was a nightmare. So, I am glad this thing is  
20 put together.

21 I am glad Miles is in charge of  
22 it. I worked with him on the Organic Advisory

1 Board here in Washington State. He did a  
2 marvelous job.

3 I appreciate the time you guys put  
4 in. I have been on boards and commissions.  
5 You are pretty much probably brain-dead by  
6 now, and I feel for you. I have been there.

7 But what I want to talk to you  
8 today about is the tetracycline. I am an  
9 organic farmer and have been for 19 years.  
10 Every spring break, my daughters will go out  
11 and we plant 15 acres. I have seven  
12 daughters, and we would plant 15 acres and we  
13 were organic. And that's how our farm got  
14 started.

15 I am also a consultant, and I  
16 consult on 10 organic growers. I also do  
17 conventional, but I do 10 organic growers,  
18 myself included. Nine of those 10 use  
19 tetracycline. Only one doesn't, and that's  
20 me. You can ask me that, why, later.

21 What we do, though, is I wanted to  
22 tell you how we control fire blight. You

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1 know, you have heard a lot of comments about  
2 it. But this is from a grower's standpoint.  
3 This is what I tell my guys.

4 First of all, we have to have  
5 cultural practices. We have got to keep our  
6 vigor down low. The disease will spread real  
7 easy. We have got to keep moisture out of the  
8 orchard. That triggers the whole problem.

9 And so, we come in and we try to  
10 do those things. And, then, we come in right  
11 as we start to bloom and we spray an  
12 antagonist bacteria. We spray it at 20, 50,  
13 and full 100 percent bloom.

14 We use this material, and, then,  
15 we come in. If we get a bad infection, we use  
16 a blight model, just like my bro there from  
17 Michigan was talking about. We use a computer  
18 model from WSU. And when we see that coming,  
19 we come in and we spray and we use  
20 tetracycline.

21 And, then, we do a lot of scouting  
22 through the orchard to cut out any of the

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1 blight strikes, infect the cutting materials  
2 each time so that we don't have that spread.

3           And this is how we pretty much  
4 control it. It is like building a house. You  
5 have all these tools in the toolbox. Well, if  
6 you look at one of the most important tools,  
7 it is a hammer. And that's what tetracycline  
8 is for us.

9           It is a product that I think we  
10 can use, and I think it would be a shame if we  
11 took it out. Like I said, nine of my growers  
12 would drop out.

13           I am the only European-certified  
14 grower out of the bunch, and the reason why is  
15 because I chose not to use the tetracycline.  
16 But I still think it is a product that we need  
17 really bad.

18           I heard somebody ask, well, do the  
19 consumers like to eat that? Well, I go and do  
20 in-store demos across the United States. I go  
21 from Minnesota to Washington to Idaho. I grow  
22 14 different varieties and some of my own.

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1 So, I want to get those out in there.

2 And I show them exactly how we  
3 take care of it. And do you know that the  
4 consumer doesn't have a real issue when I tell  
5 them what we spray for fire blight. Their big  
6 issue is when I tell them we spray a virus for  
7 codling moth control. That gets them a little  
8 kinked. And so, I just want you to know that  
9 consumer preference on this I think would be  
10 okay.

11 I want you to know that we do not  
12 spray the fruit. We spray the flowers only.  
13 And we only spray when we have the problem.  
14 So, when you see a usage that says only five  
15 out of ten, 50 percent of the growers used it,  
16 well, the reason that is because we didn't  
17 have an infection period.

18 So, my time is up. I appreciate  
19 it. If you have any questions --

20 CHAIR MIEDEMA: Thank you.

21 MR. CRAVER: Yes.

22 CHAIR MIEDEMA: Steve and, then,

1 Jay.

2 MR. DeMURI: So, on an average,  
3 how many times every five years would a grower  
4 have to spray it?

5 MR. CRAVER: Well, my growers  
6 right now, I would say we spray it seven out  
7 of ten years because of the chance with the  
8 fire blight.

9 CHAIR MIEDEMA: Jay?

10 MR. FELDMAN: My first question  
11 is, why? Right? You said we could ask you  
12 why you're --

13 MR. CRAVER: Oh, why I don't?  
14 Yes, I'll tell you.

15 MR. FELDMAN: And, then, my second  
16 question is for you and your bro from  
17 Michigan, who was speaking so slow that my  
18 brain slowed down, and I forgot my question.

19 (Laughter.)

20 That is, why -- you know, we are  
21 talking about some modeling here that goes to  
22 the question of a prediction, predicting a

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1 problem that you are spraying for. And we  
2 have heard statements in terms of strep that  
3 that can be more of a curative application  
4 after -- that's what I meant to ask him --  
5 after the disease expresses itself.

6 MR. CRAVER: Once the disease  
7 expresses itself, there is nothing you can do  
8 but cut it out of the tree. There is nothing  
9 that is going to cure it.

10 The guys back East might have a  
11 little different idea on that. But if you  
12 have got fire blight, if you have got an  
13 infection period, the only way to get rid of  
14 it is through sanitation and cutting it out  
15 and making sure you don't have any things  
16 later.

17 And again, it is a bloom spray.  
18 And after that, if you missed it and you got  
19 fire blight, then you have got to go through  
20 and cut it out.

21 And the other thing about fire  
22 blight is a neighbor can have a really bad

1 infection next door to you, and you could be  
2 the cleanest, greatest grower, but those  
3 bacteria can move throughout the orchards.

4 MR. FELDMAN: So, why aren't you  
5 using it?

6 MR. CRAVER: Why aren't I using  
7 it? Okay. My orchard was, you know, I  
8 started 20 years ago. My orchard is located  
9 around a game preserve. And so, I am very  
10 isolated. Isolation is important for  
11 organics.

12 At that time, I wanted to get into  
13 Europe. I felt that was where the demand was  
14 for apples, smaller fruit, and whatnot. So,  
15 I made the choice to go European certified.

16 Like I said, I grow 14 varieties  
17 of apples, five of cherries, and I used to  
18 grow three varieties of pears. Two of them  
19 became infected with fire blight, and I made  
20 the decision to cut my trees out instead of  
21 spreading it to some of my apple varieties.

22 I use all of the other care that I

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1 have talked to you about of doing it. And I  
2 just made that choice not to spray Mycoshield  
3 and I want to stay in the European Union.

4 But the growers that I consult on,  
5 they don't care. I think if you pull this  
6 off, they are just going to immediately drop  
7 out of the program.

8 We can't go on in pear production  
9 and some varieties of apples without it. I  
10 just made a personal decision on that. I  
11 think my orchard is located in a situation  
12 where that is able to do it.

13 CHAIR MIEDEMA: Thank you, Mr.  
14 Craver.

15 MR. CRAVER: Okay. Thanks.

16 CHAIR MIEDEMA: Robert Beauregard  
17 is up next.

18 Is that Diane Dempster?

19 Come on up and work that out with  
20 Lisa while Mr. Beauregard goes.

21 MR. BEAUREGARD: Hi. My name is  
22 Bob Beauregard, and I am with the Country Hen.

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1 We are organic egg producers.

2 We here at the Country Hen would  
3 like to thank you for the opportunity to  
4 comment on the proposed recommendations for  
5 animal welfare. We greatly appreciate the  
6 time and effort that goes into creation of  
7 improved standards and are happy to provide  
8 our comments from a producer's point of view.

9 We do, however, have very serious  
10 concerns about the challenges we face as  
11 organic egg producers, based upon suggested  
12 recommendations to free-range poultry at two  
13 square feet per bird directly on soil.

14 I have included several  
15 attachments with regards to our primary  
16 concerns of disease, internal and external  
17 parasites, and the health and safety of the  
18 hens.

19 The Country Hen respectfully  
20 suggests that the Livestock Committee  
21 reevaluate the recommendations and consider  
22 both the intended and unintended consequences

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1 that may occur as a result of pursuing these  
2 recommendations.

3 During this process, we hope you  
4 will take the following into consideration:

5 Will or should the recommendations  
6 overlap other federal, state, or local agency  
7 regulations with regards to food safety,  
8 environmental protection, drinking water  
9 quality, and/or storm runoff pollution?

10 The risk involved for poultry  
11 producers with regards to potential health and  
12 disease issues that will increase nationwide  
13 due to the increase of poultry exposed to the  
14 presence of geese, ducks, and shorebirds,  
15 coupled with the inability to ensure these  
16 birds against these diseases.

17 As far as food safety concerns, is  
18 the anatomy of the chicken prepared to handle  
19 the possible contamination of soil dioxins and  
20 internal parasites which could be incorporated  
21 into the egg during the shell-forming process?

22 The financial impact that

1 currently-certified organic producers would  
2 incur in either attempting to adhere to these  
3 standards or as a result of being unable to  
4 adhere because they cannot possibly  
5 accommodate these changes to their production  
6 model due to space, building size,  
7 environmental issues, and/or topographical  
8 location to watersheds.

9 A science-based study that would  
10 clearly demonstrate the viability of soil-  
11 based runs at two square foot per bird and how  
12 many rotational paddocks would be required at  
13 this density to maintain soil integrity.

14 And finally, in an effort to  
15 resolve these issues and work together to  
16 improve the standards in a safe and viable  
17 manner, should an organic poultry symposium be  
18 formed, as was formed with the organic dairy  
19 producers before those recommendations were  
20 made?

21 Again, we thank you for the  
22 opportunity to comment on these

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1 recommendations and for your hard work and  
2 efforts.

3 CHAIR MIEDEMA: Thank you, Mr.  
4 Beauregard.

5 Any questions? Nick Maravell has  
6 one.

7 Mr. Beauregard? Mr. Beauregard?  
8 We have one question for you. Thank you.

9 MR. MARAVELL: You are suggesting  
10 an organic poultry symposium be formed.

11 MR. BEAUREGARD: Yes.

12 MR. MARAVELL: So, obviously,  
13 because of your background, your concern is  
14 only for poultry. How would that work in your  
15 mind, and how would that help?

16 The Committee has heard a lot.  
17 So, what did we miss here that --

18 MR. BEAUREGARD: Well, I don't  
19 think the Committee has heard everything. And  
20 in three minutes, that is almost impossible to  
21 do.

22 Our concerns, basically, are all

1 based on internal and disease control. When  
2 you put chickens at two square feet per bird,  
3 and with no recommendations or guidance as far  
4 as how they should be rotated in order to  
5 maintain the soil -- we are right on the  
6 Boston water supply. So, I would have to  
7 rotate, in my own point of view, based on  
8 European standards at 43 square feet per bird,  
9 if I am going to put them at two, I would have  
10 to move those birds on a daily basis in order  
11 to maintain that soil integrity. So, that  
12 means I would need over 800 acres of land in  
13 order to move my birds. I just couldn't do  
14 that. There is no way that we can move those  
15 birds around.

16 I mean we are considered as a  
17 factory farm from consumer advocate groups.  
18 And my largest flock size is 7,000 birds. We  
19 base our standards --

20 MR. MARAVELL: I don't think you  
21 are addressing my question, but I appreciate  
22 the input. And in the interest of time, Madam

1 Chair, should we move on?

2 CHAIR MIEDEMA: Thank you, sir.

3 Melissa?

4 MS. BAILEY: I think Nick raised  
5 the issue of a poultry symposium. Just to  
6 follow up on Bob's comment, and for the  
7 benefit of the Board, the program is currently  
8 considering for poultry conducting a symposium  
9 early this summer. So, that is something that  
10 is on our radar.

11 CHAIR MIEDEMA: Wonderful. Thank  
12 you.

13 I just want to do a quick  
14 housekeeping check-in here. I would like to  
15 go ahead and call out the names of everyone  
16 still scheduled today to provide public  
17 comment, just so I can plan whether or not we  
18 should take a break.

19 And, then, I also had a question  
20 for the program. This is very general. I  
21 received a concern from a member of the public  
22 who wished to refute something that was said

1 about them or their organization. We don't  
2 provide a forum for sort of cross-postings  
3 here at the Board level.

4 And I wanted to just make a  
5 general announcement for members of the public  
6 how they can put on the record in some other  
7 way a response, if they feel their reputation  
8 has been impugned and they don't have a chance  
9 to get up and speak again.

10 MR. MILLER: I am sorry. This is  
11 a full --

12 CHAIR MIEDEMA: Sir --

13 MR. MILLER: I need to correct it  
14 in the public. I'm sorry.

15 CHAIR MIEDEMA: You're out of  
16 order. You are out of order, sir.

17 But, Miles, the Deputy  
18 Administrator, please reply.

19 MR. McEVOY: Yes, I think we need  
20 to think about this a little bit because there  
21 could be many people that want to submit  
22 comments in response to things that were

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1 submitted. So, it is all part of the public  
2 record. As the Board continues to work on  
3 things, as the program continues to work on  
4 things, there is ample opportunity to provide  
5 continued public input and comments into this  
6 process.

7 So, we will think about it.

8 CHAIR MIEDEMA: Might we suggest  
9 the next comment period as one forum for that?  
10 Would that be something appropriate?

11 MR. McEVOY: You are suggesting  
12 that there be one forum just for people to  
13 respond to --

14 CHAIR MIEDEMA: Not at all. Not  
15 at all.

16 (Laughter.)

17 No. We will have a comment period  
18 again before our next meeting.

19 Okay. So, I am going to go ahead  
20 and call out the names of everyone signed up.  
21 If you would mind waving, so we can find out  
22 how many of you are still here?

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1 Diane Dempster, I see you are  
2 here.

3 Jerry Bartlett?

4 Matthew -- John Baker? John  
5 Baker, are you here? Okay. Thank you.

6 Jenise Silva? Jenise Silva, are  
7 you here? Or has anyone seen her? Okay.

8 Bob Durst?

9 MR. DURST: Here.

10 CHAIR MIEDEMA: Okay. Herwig  
11 Opdebeeck? Mr. Opdebeeck?

12 MR. DURST: He's here.

13 CHAIR MIEDEMA: Okay. All right.  
14 Well, we have already said enough names that  
15 a break will be appropriate.

16 Board members, please be seated,  
17 again, in 10 minutes. Thank you.

18 (Whereupon, the foregoing matter  
19 went off the record at 4:57 p.m. and resumed  
20 at 5:11 p.m.)

21 CHAIR MIEDEMA: We're back in  
22 session. The NOSB is back in session.



1                   Diane Dempster is coming to the  
2 podium. Jerry Bartlett is standing by. Thank  
3 you.

4                   MS. DEMPSTER: Hi. My name is  
5 Diane Dempster, and I am delivering public  
6 comments on the Crop Committee's proposal on  
7 ethylene on behalf of Melody Meyer, Vice  
8 President of Global Initiatives at Albert's  
9 Organics, who is unable to be here today.

10                  Albert's is headquartered in  
11 Bridgeport, New Jersey, and has been a pioneer  
12 of the organic fresh foods industry since  
13 1982. They have grown to become America's  
14 largest organic produce distributor with  
15 centers in California, Colorado, Florida, New  
16 Hampshire, Minnesota, North Carolina, and New  
17 Jersey. They have their own national,  
18 regional, and international buying centers,  
19 creating longstanding relationships with  
20 organic farmers locally, regionally, and  
21 globally.

22                  Albert's Organics maintains an in-

1 stock status of over 300 seasonal fruits and  
2 vegetables, providing product to over 5,000  
3 natural food stores and supermarkets.

4 Albert's sources organic pineapple  
5 from Ecuador, Costa Rica, the USA, and Mexico.  
6 Last year they sold over 65,000 cases of  
7 organic pineapple. In 2010, they began  
8 directly importing pineapple from Ecuador and  
9 Costa Rica, developing direct relationships  
10 with small and medium-sized growers.

11 Most of the growers are in  
12 underprivileged areas of the central and  
13 southern hemisphere where organic agriculture  
14 and international trade is the only means of  
15 achieving financial stability.

16 In visits to these growing  
17 regions, it is evident that good roads,  
18 electricity, and running water are the  
19 benefits that would not be achieved without  
20 the organic agriculture activities.

21 Albert's Organics respectfully  
22 disagrees with the Crop Committee's

1 recommendation to prohibit ethylene for  
2 regulation of pineapple flowering. Melody  
3 just made a trip to Latin America last week  
4 and talked to many pineapple producers. Every  
5 grower uses ethylene and considers it  
6 essential to their operation.

7 From the mouth of one producer,  
8 "If ethylene use is eliminated in organic  
9 pineapple production, it is the end of organic  
10 pineapple."

11 This, then, would result in the  
12 loss of thousands of labor jobs on farms and  
13 scores of additional jobs in the community.

14 It is the very essence of  
15 pineapples for the flowering to be delayed and  
16 occur unevenly throughout the field. Organic  
17 pineapple growers rely on ethylene to manage  
18 the timing of the plants' flowering and,  
19 therefore, the timing of harvest.

20 The impact of ethylene is not only  
21 beneficial at harvest, it also facilitates  
22 efficient cultivation, size management, and

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1 helps to avoid over- and underproduction.  
2 Without even ripening and size consistency, a  
3 grower cannot fill containers to ship to our  
4 northern climates.

5 Good management includes pest and  
6 disease management, fertilization, and  
7 cultural practices. Plant uniformity during  
8 harvest reduces the incidence of worker injury  
9 and accidents.

10 Allowing the organic pineapple  
11 producer to maximize all management and  
12 cultural practices, including ethylene, will  
13 result in healthier plants, prosperous people,  
14 a sustainable crop, and a vital U.S. sales  
15 market.

16 The result of banning ethylene  
17 will mean more conventional pineapple and,  
18 hence, more pesticides, herbicides, and  
19 fertilizers in the soils and waters. The  
20 organic produce market will be less vital as  
21 a result.

22 Please also reference the

1 information presented in the Supplementary  
2 Technical Report commissioned for this meeting  
3 that supports our position that there have  
4 been no new alternatives to the use of  
5 ethylene gas identified since the material was  
6 first reviewed, and that there are methods of  
7 applying ethylene that are both affordable,  
8 practical for use by large and small growers.

9 CHAIR MIEDEMA: Thank you, Ms.  
10 Dempster.

11 Any questions?

12 (No response.)

13 Thank you.

14 Oh, we have one. Barry Flamm?

15 MR. FLAMM: Did I understand that  
16 you say that you are getting organic from  
17 Ecuador?

18 MS. DEMPSTER: Ecuador and Costa  
19 Rica.

20 MR. FLAMM: I understood from  
21 previous comments that all the shipment to the  
22 United States was from Costa Rica. So, I just

1 wanted to make sure I understood.

2 What percent of the total  
3 production is from Ecuador?

4 MS. DEMPSTER: You know, I don't  
5 know because I am speaking on behalf of  
6 someone else.

7 MR. FLAMM: Okay.

8 CHAIR MIEDEMA: Barry, you are  
9 referring to a statistic earlier. It was 82  
10 percent that Luis Monge said, not 100 percent.

11 MS. DEMPSTER: I also want to just  
12 say quickly that we support the tetracycline  
13 in apple and pear production.

14 CHAIR MIEDEMA: Thank you.

15 Jerry Bartlett is up next.  
16 Matthew Grieshop is standing by.

17 MR. BARTLETT: Thank you.

18 I am Jerry Bartlett. I am the  
19 Chief Environmental Sustainability Officer for  
20 Cedar Grove Composting, and I am also  
21 representing the Washington Organic Recycling  
22 Council today.

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1 I am a composter in this State and  
2 have had a registered compost product for over  
3 a decade.

4 The issue before us today has to  
5 do with the types of feedstocks that we take  
6 into our composting business. As the food  
7 waste recycling or food waste diversion  
8 programs have intensified in the United  
9 States, particularly in the Seattle area, we  
10 have also been kind of forced with the issue  
11 of taking in lots of compostable food or  
12 dinnerware, compostable bags, and those types  
13 of products. And we take those feedstocks in  
14 and we compost those.

15 There are a couple of test methods  
16 that I think that you should look at as  
17 adopting as rules for feedstocks going to  
18 composting. They are ASTM methods. There are  
19 three of them that do heavy-metal analysis,  
20 vital toxicity, and microbial disintegration  
21 of the material.

22 Now, remember, these products

1 aren't applied directly to agricultural lands.  
2 They are feedstocks for composters.  
3 Composters turn them into compost, and, then,  
4 that product is then sold. Currently, we  
5 separate out all of these materials from our  
6 feedstocks that are going to organic compost  
7 production.

8           So, I wanted you to be aware of  
9 that, and I also wanted to turn in kind of a  
10 letter from the Washington Organic Recycling  
11 Council that kind of explains the test methods  
12 a little bit more clear and more in detail.

13           It also happens to be the time  
14 with the ASTM methods that are being opened up  
15 for changes as well. So, I think that it is  
16 important, if you are likely to approve an  
17 ASTM test method as opposed to having each  
18 product individually petitioned, which takes,  
19 obviously, months, and as I found out in this  
20 conference, years, it would probably save the  
21 Committee a lot of time by adopting these  
22 methods. And if there is something wrong with

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1 those methods, maybe advocating some changes  
2 in those methods that would satisfy the  
3 organic growers.

4 Thank you.

5 CHAIR MIEDEMA: Thank you.

6 Any questions?

7 (No response.)

8 Okay. I guess not.

9 MR. BARTLETT: Okay. Can I turn  
10 them into you? Great. Thank you.

11 CHAIR MIEDEMA: Matthew Grieshop,  
12 and please correct my mispronunciation.

13 MR. GRIESHOP: It gets pronounced  
14 all kinds of ways, but usually "Greeship" or  
15 "Gership". But it is just fine.

16 So, my name is Matt Grieshop. I  
17 am the Assistant Professor of Organic Pest  
18 Management at Michigan State University. I am  
19 also on the Board of MOFA, the Michigan  
20 Organic Food and Farm Alliance.

21 I am here to talk about  
22 streptomycin and its importance to organic

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1 apple production in Michigan and, really, the  
2 more humid part of the country, so the eastern  
3 portion of the country.

4 The reason I brought MOFA up is  
5 really, to a large extent, I think this is  
6 also an issue of the production of local  
7 organic food.

8 I was going to talk a lot about  
9 management, but Dain did a much better job  
10 than I was in that regard. Growers typically  
11 do a good job of doing that.

12 But I will talk a little bit about  
13 fire blight. Fire blight is really a concern  
14 when we hit an epidemic. To give you a point  
15 of reference, in 2000, in Michigan, in  
16 southwestern Michigan primarily, we had a fire  
17 blight epidemic. We lost 400,000 trees. Many  
18 of those trees were Red Delicious, which is  
19 one of the most resistant fruiting varieties  
20 to fire blight. That translates to \$42  
21 million.

22 Now this wasn't organic acreage,

1 but it was significant to the Michigan fruit  
2 industry. And essentially, we lost 18 percent  
3 of our acreage in Michigan. We also lost 15  
4 percent of our farmers. They just weren't  
5 able to come back. They lost their massive  
6 investment in their trees, and that was it for  
7 them. They had to roll up the carpet.

8 And that epidemic was due to some  
9 very unusually warm, wet weather followed by  
10 winds and hail. And it is when we get these  
11 kinds of conditions that fire blight is truly  
12 a threat, and really farmers without an  
13 antibiotic treatment are one epidemic away  
14 from crop loss and total farm failure.

15 I was going to talk about  
16 management at this point, but, as I said, Dain  
17 did a good job.

18 I did want to clear what sounded  
19 like some confusion about resistance. When we  
20 talk about resistance in fire blight, it is  
21 not total resistance or a complete resistance  
22 or what oftentimes plant pathologists call

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1 qualitative resistance. It is quantitative  
2 resistance.

3 To the best of my knowledge, all  
4 commercially-produced apples are susceptible  
5 to fire blight. The level of susceptibility  
6 is what is variable.

7 Fujis are very susceptible. Pink  
8 Ladies are very susceptible. Things like  
9 Liberty -- how many people here have eaten a  
10 Liberty apple? Okay, we've got two people.  
11 Hey, that's good. Jim will like that. He  
12 likes those apples, yes.

13 (Laughter.)

14 At any rate, those are quite  
15 resistant, but the problem is that consumers  
16 don't have a good recognition of that fruit.

17 So, that is an important thing to  
18 think about. We don't have true resistance in  
19 the sense that there is a gene-to-gene or even  
20 multi-gene-to-gene relationship that is well  
21 understood.

22 So, why streptomycin? So, I think

1 Dain said it best. He talked about early on  
2 in the season in Washington he asks his  
3 growers to make sure they keep things dry.  
4 The reason that is is that fire blight  
5 develops under moist conditions and under warm  
6 conditions.

7 Now I don't know how many of you  
8 are familiar with Michigan. We get rain all  
9 the time. I mean the natural landscape there  
10 is a temperate forest.

11 So, we can't keep our trees dry.  
12 I mean it is, like this time of year, we have  
13 had two weeks of rain. Right now, in bloom is  
14 coming up, when we are susceptible to fire  
15 blight.

16 And I can stop there.

17 Does anyone have any questions?

18 CHAIR MIEDEMA: Mac Stone?

19 MR. STONE: Matthew, we, the  
20 Board, has been hesitant just to automatically  
21 renew a Sunset, and what is the incentive for  
22 growers? But could you speak to potential

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1 resistance to tetracycline? Like, how long do  
2 the growers have or is there work being done?  
3 Because, regardless of this Board, isn't there  
4 work being done because of the fear of lack of  
5 efficacy of tetracycline anyway?

6 MR. GRIESHOP: That is a really  
7 good question. I would say, yes, I think both  
8 conventional and organic growers are dreading  
9 the day that we see resistance to  
10 tetracycline. Its mode of action is not quite  
11 as extreme as streptomycin. So, it has been  
12 slower to develop. That said, you know, it is  
13 going to happen.

14 As far as I know, there aren't any  
15 organically-acceptable antibiotic replacements  
16 on the pipeline. And Dr. George Sundin, my  
17 colleague who is a plant pathologist, a tree  
18 fruit plant pathologist at MSU, has informed  
19 me of that. I think there may be some  
20 products for the conventional market, but that  
21 is not going to do our organic growers much  
22 good.

1           To segue a little bit, but,  
2           hopefully, not too much, and I am not trying  
3           to butter my own bread here as a researcher  
4           because I am not a microbiologist by training,  
5           but we really need research funding for fire  
6           blight management. And this really crosses  
7           the line between organic and conventional.  
8           Right now, our management strategies are very  
9           unified across the two, these two types of  
10          cropping, crop production systems.

11           I would say that a good place to  
12          start would be to look at integration of some  
13          of the biological tools that Dain mentioned.  
14          So, competitive organisms with antibiotics,  
15          and some early work that George Sundin has  
16          done has shown that you can actually  
17          potentially reduce antibiotic use by doing  
18          that.

19           But, beyond that, I think we need  
20          new biologicals that produce antibiotics, like  
21          Serenade. Not everyone realizes that, but  
22          Serenade is an antibiotic product as well. It

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1 is an unknown antibiotic, but it is an  
2 antibiotic produced by that organism. But we  
3 need to move in that direction.

4 CHAIR MIEDEMA: Thank you.

5 Jay Feldman?

6 MR. FELDMAN: Thank you.

7 Do you see any difference in terms  
8 of susceptibility to the infection between  
9 conventional orchards and organic orchards?

10 MR. GRIESHOP: Well, there  
11 definitely is. I think, again, I mean Dain  
12 touched on it. And, to me, it was a good  
13 explanation, but maybe to someone who is not  
14 in orchards a lot it wouldn't be.

15 What it really comes down to there  
16 is nutrient management. Fire blight does well  
17 on young nitrogen-rich foliage, and it does  
18 even better when that foliage gets a little  
19 torn.

20 So, typically, in an organic  
21 nutrient management plan, you are not putting  
22 on a lot of nitrate or straight ammonium.

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1 Well, I guess there might be a little Chilean  
2 nitrite, but you should be putting on compost  
3 or manure, depending on your management plan.  
4 And that usually cuts down on tree vigor and  
5 you don't see as much susceptible tissue to  
6 fire blight.

7 Pruning is also important. If you  
8 prune at the wrong time of the year, and I  
9 have learned this in my orchard, if you prune  
10 around bloom, you are asking for it because  
11 you get a lot of young foliage coming back and  
12 some nice wounds, and if any bacterial ooze  
13 gets on that, then you are going to have some  
14 fire blight problems.

15 CHAIR MIEDEMA: Thank you.

16 MR. GRIESHOP: All right.

17 CHAIR MIEDEMA: John Baker, please  
18 come up to the podium. Jenise Silva is  
19 standing by.

20 Jenise, are you here?

21 (No response.)

22 Bob Durst, please come on up and

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1 in the standby area.

2 Go ahead, Mr. Baker.

3 MR. BAKER: Okay. Hello. My name  
4 is John Baker, President of Giving Nature  
5 Foods. My company contracts for and markets  
6 organic eggs in the Mid-Atlantic and the  
7 greater New York City regions of the United  
8 States.

9 I am also the founding member of  
10 PATHS, Progressing Agriculture Towards Healthy  
11 Sustainability, a sustainable farmers'  
12 advocacy group.

13 I am here to tell the story of two  
14 studies regarding laying hen diseases.  
15 Specifically, these studies examine frequency  
16 of certain disease occurrence under different  
17 housing formats. Both studies were done in  
18 Europe, and the results were published in the  
19 mid-2000s.

20 The first one I will present is  
21 often used to condemn outdoor pasture access,  
22 and the second one is used to promote it.

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1 These studies are often referred to in  
2 comments and press releases, but are not  
3 specifically named. So, it is likely you have  
4 not heard of them and do not know their  
5 sources.

6 This study, most often cited by  
7 anti-pasture advocates, was done in Sweden.  
8 The source for its results -- excuse me a  
9 second; okay -- the source for its  
10 results -- okay, it was done in Sweden. The  
11 source for its results were extrapolated from  
12 mortality records and were not a result of  
13 laboratory research.

14 The study was carried out by  
15 Sweden's National Veterinary Institute. This  
16 data research found a higher incidence of  
17 mortality and evidence of various diseases in  
18 cage-free and free-range flocks when compared  
19 to caged layer houses. The incidence of live  
20 SE Salmonella were not studied because the  
21 results were gleaned from mortality records  
22 and not live samples.

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1           While the conclusions reached by  
2           the study found litter-based and free-range  
3           systems to be the culprit, it also concluded  
4           that poor knowledge of best or good management  
5           practices to be the biggest reason for the  
6           higher mortality. This is because many  
7           operators of the flocks studied had only  
8           recently converted from cage systems to cage-  
9           free or free-range systems and lacked the  
10          husbandry knowledge needed to be successful.

11          The study that supports greater  
12          outdoor access and, indeed, pasture  
13          availability as an important component of that  
14          access comes from a study commissioned by the  
15          European Union. For this study, the EU  
16          directed their food safety and disease control  
17          agencies to collect data on laying flocks in  
18          EU countries phasing out barren cages, using  
19          a live sample laboratory research model.

20          The EU study is far more focused,  
21          more vast in scope of sample taken, and was a  
22          live culture study. For example, the total

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1 size of the samples taken number 30,000 while  
2 the Sweden only examined 914 samples.

3 While the anti-pasture advocates  
4 often cite the Sweden study to defend their  
5 position, you can see that this study didn't  
6 even examine occurrence of SE in its research.  
7 It is used often to support concerns about  
8 compromising food safety as it relates to  
9 greater outdoor access for laying hens.

10 The results of that study were  
11 this: 43 percent lower SE odds in cage-free  
12 barns than in caged; 95 percent lower SE odds  
13 in organic than in caged; 98 percent lower SE  
14 odds in free-range than in cage.

15 My personal conclusion: make eggs  
16 safer to eat. Get the layer hens out of the  
17 cages and barns. Get them outside in pasture.  
18 It is a public health issue.

19 CHAIR MIEDEMA: Thank you.

20 Any questions?

21 (No response.)

22 Thank you very much.

1                   Bob Durst? Herwig Opdebeeck is  
2 standing by.

3                   Mr. Opdebeeck, are you here?

4                   MR. DURST: Bob Durst, Simple  
5 Organic Solutions, a consultant.

6                   I support the majority decision to  
7 determine that CSL is a non-synthetic. I know  
8 that the Board is quite polarized on this  
9 issue. And while as a chemist, I could go  
10 into the chemistry involved, you have heard  
11 from many others about that and have a number  
12 of detailed resources in front of you.

13                  While the decision process for CSL  
14 that has been recommended to be non-synthetic  
15 may not be perfect, and to some this seems to  
16 be a one-off decision, there are significant  
17 ramifications to this decision, and it might  
18 be useful to straighten out the decision  
19 process before many more similar decisions  
20 have to be made. But don't delay this anyway.

21                  When agricultural waste is  
22 composted, the synthetic/non-synthetic

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1 decision tree from the Materials Working  
2 Group, which I know has not been adopted yet,  
3 is not a suitable tool to determine the  
4 acceptability of composted material.

5 I heard earlier today that  
6 consumers want an explanation of how one can  
7 justify acceptance of CSL. The answer is the  
8 composting process. This has been deemed to  
9 be an acceptable intervening step for a wide  
10 variety of nasties that are present in green  
11 waste.

12 There is no debate about the GMO  
13 status of the input corn. Composting makes it  
14 acceptable. There is no debate about the  
15 presence of herbicides and pesticides in the  
16 corn or with bifenthrin in yard waste, as an  
17 example, that gets composted. It is  
18 acceptable.

19 Sulfurous acid, which is SO<sub>2</sub> and  
20 water, made on farm has been accepted,  
21 601(j)(9), for direct soil application as a  
22 soil amendment. Yet, exposure at

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1 insignificant levels to SO2 early in the  
2 process of producing corn steep liquor is  
3 deemed to make it synthetic. This just does  
4 not seem consistent or justifiable.

5 Remember that CSL is not being  
6 applied directly to the soil. It is an input  
7 which undergoes further microbial digestion  
8 and blending with other ingredients to  
9 formulate a suitable soil amendment.

10 The fallout from CSL being deemed  
11 synthetic would have wide-ranging adverse  
12 impact on farmers' ability to provide adequate  
13 plant nutrition to an organic farm.

14 Since I have a little more time, I  
15 am going to talk about pheromones for a quick  
16 second. Don't change the annotation. The  
17 suggested language for "added toxicants or  
18 substantially similar to" are not definitive  
19 language. The current rule and language  
20 noting acceptance of EPA List 3 and List 4  
21 items are more than adequate to define the  
22 acceptability of pheromone materials.

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1 Thank you.

2 CHAIR MIEDEMA: Any question?

3 Okay, Jay Feldman?

4 MR. FELDMAN: Thank you.

5 A great way to end the day, Bob,  
6 huh?

7 (Laughter.)

8 MR. DURST: Why not?

9 MR. FELDMAN: Our favorite topic.

10 (Laughter.)

11 I was wondering if you are  
12 familiar with the OMRI decision tree when --

13 MR. DURST: The OMRI decision  
14 tree?

15 MR. FELDMAN: What did I say?  
16 OMRI. See, it is late. The OMRI decision  
17 tree on CSL, which, as you know, found it to  
18 be synthetic because of the breaking of bonds  
19 in portions of the process, although  
20 biological --

21 CHAIR MIEDEMA: Question, please.

22 Question.

1                   MR. FELDMAN: Well, these are the  
2 decisions. Include a chemical change process.  
3 Are you familiar with the decision tree of  
4 OMRI?

5                   MR. DURST: Yes, I am.

6                   MR. FELDMAN: And so, what do you  
7 think about it?

8                   MR. DURST: Again, just like the  
9 Materials Working Group decision tree, I don't  
10 think it adequately captures the process that  
11 composting goes through and is used when  
12 making a decision. There's too many really  
13 close or knife-edge kinds of decisions that  
14 have to be made in that decision tree about  
15 whether something is synthetic or not, when  
16 there is this massive biological process of  
17 composting going on which is massively  
18 changing the chemical structure of the  
19 material, which is deemed acceptable.

20                   CHAIR MIEDEMA: I have a followup  
21 question, and, then, Nick. Okay. Then, if we  
22 have time, we can do round two.

1 I have a question on a different  
2 topic. You mentioned during a break that the  
3 prestigious Linus Pauling Institute wished to  
4 weigh-in on the nutrient vitamins and minerals  
5 material for relisting on 605(b), and that  
6 they decided not to attend the meeting once  
7 the NOP announcement was put forth.

8 Do you have any idea what their  
9 comments would have been, had they known to  
10 come?

11 MR. DURST: I don't know exactly  
12 what the comments would have been, but I will  
13 read you what the mission statement is just  
14 real quickly from the Pauling Institute.

15 It is "To determine the function  
16 and role of vitamins and essential minerals,  
17 micronutrients, and chemicals from plants,  
18 phytochemicals, in promoting optimum health  
19 and preventing or treating disease."

20 We strongly weigh-in in favor of  
21 these kinds of materials.

22 CHAIR MIEDEMA: Okay. Thank you.

1                   We are at five. If we can make  
2                   our followup questions from Nick and Jay very  
3                   quick, we can indulge them.

4                   MR. MARAVELL: In stating that we  
5                   need to look at compost feedstock a little bit  
6                   differently than we might look at other  
7                   agricultural inputs, because it goes through  
8                   a composting process, is your argument  
9                   basically that the composting process would  
10                  ameliorate or remediate anything that was  
11                  coming in that might be deemed objectionable?

12                  MR. DURST: Yes.

13                  MR. MARAVELL: I am just saying I  
14                  just want to know if that is your argument.

15                  MR. DURST: Yes, absolutely.

16                  MR. MARAVELL: Okay.

17                  MR. DURST: The kinds of materials  
18                  that are going in would never be deemed  
19                  acceptable if they had not gone through a  
20                  composting process which is degrading them and  
21                  breaking them down.

22                  CHAIR MIEDEMA: Jay, do you have

1 a -- okay.

2 Thanks.

3 Herwig Opdebeeck, and Cheryl Van  
4 Dyne is standing by.

5 MR. OPDEBEECK: Good afternoon.

6 My name is Herwig Opdebeeck. I am  
7 a scientist. My company is Opdebeeck  
8 Consulting from Switzerland.

9 Eight years ago, on my own  
10 initiative, I started looking into natural  
11 nitrate, trying to understand why there was so  
12 much dramatically-charged opposition against  
13 it in Europe.

14 I found that the origin of the  
15 sentiment was based on fundamental  
16 misunderstandings about crop nutrition related  
17 to organic principles, which I explain in the  
18 book I wrote based on more than 100 peer-  
19 reviewed references, about half of them  
20 originating from organic research institutes.  
21 That is the book.

22 These misunderstandings that led

1 to the total prohibition of natural nitrite in  
2 Europe did have, and still has, its negative  
3 consequences. For example, in Switzerland,  
4 over 90 percent of organic wheat is imported  
5 from overseas, where it is the case for only  
6 40 percent of conventional wheat. The reason  
7 Swiss organic wheat has such a poor baking  
8 quality is because of lack of protein caused  
9 by too low of nitrogen availability during  
10 critical growing stages in the early spring.

11 As explained by people that  
12 preceded me, similar nitrogen availability  
13 problems exists in this country for all the  
14 crops. Such unintended consequences would not  
15 have happened if the EU wouldn't have been  
16 married to the outcome, but would, instead,  
17 have looked more carefully into scientific  
18 evidence.

19 For example, the conclusions of a  
20 recent study on the renown DOC trial plots,  
21 the Swiss Organic Research Institute reached,  
22 "The nitrogen use efficiency of any fertilizer

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1 can only be increased by better  
2 synchronization of the nitrogen supply, and  
3 that this is best achieved by combining animal  
4 manure and other carbon sources with mineral  
5 fertilizer."

6 This and other evidence are,  
7 indeed, relevant new science-based information  
8 since the last Sunset review.

9 Equivalency may be an underlying  
10 concern, but it shall be up to the farmer to  
11 decide if it could be used for the local  
12 market or to export overseas. In any case,  
13 the non-use of natural nitrate in organic  
14 agriculture in Europe is not a done deal.

15 Wouldn't it be ironic that maybe a  
16 synthetic soluble liquid, but less efficient  
17 nitrogen source such as CSL and other inputs  
18 would replace the natural soluble and more  
19 efficient nitrogen source? Let's not take  
20 away from farmers a tool that exists for over  
21 150 years --

22 CHAIR MIEDEMA: Thank you, sir.

1 MR. OPDEBEECK: -- and replace it  
2 with a non-natural and less effective source.

3 Thank you.

4 CHAIR MIEDEMA: Any questions for  
5 Mr. Opdebeeck?

6 (No response.)

7 Thank you, sir.

8 MR. OPDEBEECK: Thank you.

9 CHAIR MIEDEMA: Cheryl Van Dyne is  
10 coming to the podium, and Peggy Miars is  
11 standing by.

12 MS. VAN DYNE: Hi. My name is  
13 Cheryl Van Dyne. I am representing J.M. Huber  
14 and, also, a couple of organizations. One is  
15 SASSI, and the other one is DITA. SASSI is an  
16 organization about silicon dioxide, and SASSI  
17 is a defoamer institute. The organizations  
18 have provided some data for us as well as from  
19 Huber.

20 We are here to talk about the  
21 difference between ground-up rice hulls and  
22 silicon dioxide, and to provide you with some

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1 facts for helping you make your decisions. We  
2 are hoping that you will decide not to delist  
3 silicon dioxide because there is a need for it  
4 in the industry.

5 You asked for information about  
6 its approval status and its use. This  
7 presentation is very long, and I don't intend  
8 to give it all to you. But I did want to  
9 provide it to you, so that you had an  
10 opportunity to review it after the meeting is  
11 over and at your leisure.

12 Next slide, please.

13 Silicon dioxide is approved by the  
14 FDA in all kinds of areas, defoamers. It goes  
15 into dried egg yolks, animal feed, feed  
16 additives, drinking water.

17 The FCC monograph provides the  
18 purity criteria for silicon dioxide, and it is  
19 very important to understand that the purity  
20 criteria, as an international standard, allows  
21 for the prevention of adulteration and  
22 impurities. The FCC also lists the functions

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1 for silicon dioxide as anti-caking, defoaming,  
2 carrier, conditioner agent, et cetera.

3 Next slide, please.

4 These are some of the lists of  
5 applications on the left side. And, then, as  
6 you can see, across the top are different  
7 products that Huber offers. Based on the  
8 particle size, the particular application of  
9 the ingredient will call for a particular  
10 particle size of the silicon dioxide.

11 Some of the typical properties are  
12 available for you to read. These are a little  
13 bit of eye charts. So, we won't stay here.

14 Next slide.

15 There is a long history of safe  
16 use of silicon dioxide in the food industry,  
17 and it provides anti-caking and free-flow  
18 solutions. And without adequate anti-caking  
19 and free-flow properties, certain organic  
20 certified products would not be able to move  
21 through the conditions in use of commerce and  
22 arrive to the consumer of the organic

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1 products.

2 As you can see, there is just some  
3 more information about clumping, lumping, and  
4 what our silicon dioxide will do as an anti-  
5 caking, free-flow agent.

6 We did some comparisons. Just in  
7 all fairness, we are not asking silicon  
8 dioxide to replace rice hull, ground-up rice  
9 hulls. We are just saying take a look at what  
10 the differences are.

11 The ground-up rice hulls are 14 to  
12 21 percent silicon and up to 22 percent ash.  
13 This comes from their specifications online.  
14 Silicon dioxide product is a pure -- I'm done?

15 All right. Can we do just one  
16 more picture? One more. One more. There.

17 (Laughter.)

18 Okay. I wasn't sure where it was.

19 On the lefthand side is the  
20 control, and on the righthand side is the  
21 silicon dioxide. In the middle are two new  
22 flow products. And as you can see, there

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1 really isn't anti-caking going on in this.

2 So, with that, I will end.

3 CHAIR MIEDEMA: Thank you.

4 Any questions?

5 (No response.)

6 I guess we're set.

7 Ms. Van Dyne? Ms. Van Dyne, the  
8 court reporter had a question for you.

9 Is that what he is called, court  
10 reporter? Transcriber?

11 (Laughter.)

12 Sorry. I just elevated our entire  
13 proceeding to something else. Okay.

14 Peggy Miars, come on up to the  
15 podium.

16 And, Lisa, who is standing by?

17 And then Garth Kahl.

18 Go ahead, Peggy.

19 MS. MIARS: Next slide, please,  
20 Lisa. Thank you.

21 Good afternoon.

22 I am Peggy Miars, using my time to

1 present comments on behalf of Bill Wolf who  
2 was unable to attend this meeting at the last  
3 minute.

4 And I want to make it clear that  
5 these comments are neither mine nor OMRI's.  
6 I am the messenger, and I will be speaking  
7 quickly.

8 For those of you who don't know him,  
9 Bill is President of Wolf DiMatteo and  
10 Associates, the oldest organic consultancy in  
11 the United States and maybe even the world.  
12 He has been involved in organics for 40 years.

13 And now in his words, "Colleagues,  
14 I've got to be blunt. I don't like where this  
15 train is headed.

16 Many of the recommendations on the  
17 table, such as Epsom salts and nickel are,  
18 quite frankly, an embarrassment to Bill. He  
19 smells a combo of bad science and misguided  
20 intention, and in some cases a dubious  
21 process, all which add up to trouble for the  
22 organic farmer and, ultimately, if this trend

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1 continues, for the organic consumer.

2 The National List is central to  
3 the NOP regulations, and everybody in the  
4 supply chain depends on it. And the National  
5 List has to provide organic farmers with a  
6 complete and up-to-date toolbox for providing  
7 nutrient-dense organic foods.

8 Whenever we are recommending a  
9 product for or against inclusion on the  
10 National List, it has to be based on both good  
11 science and organic principles.

12 This slide shows two of the most  
13 important questions we should be considering  
14 when making our decisions. There was never  
15 any intention to bring the National List to  
16 zero. Its purpose is to support organic  
17 farming and to do it responsibly. Removing  
18 materials when there are no viable  
19 alternatives does not support better organic  
20 farming. It threatens organic.

21 And this new concept that having  
22 materials on the list is bad is hamstringing

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1 the organic farmer, and if it continues, will  
2 halt research as well.

3 Let's look at a couple of the  
4 recommendations. How many people in this room  
5 like organic apple pie? Well, guess what?  
6 There we go. Okay. The way we are headed,  
7 this may be a -- oh, he was going to actually  
8 have apple pie and serve it to you. So, too  
9 bad for you.

10 (Laughter.)

11 So, if he had, he would say this  
12 would be among your last slice of apple pie,  
13 organic apple pie, and it's no joke.

14 Without tetracycline and  
15 streptomycin, organic apple pie and pear crops  
16 are hugely vulnerable to the devastating fire  
17 blight disease. In an ideal world, would we  
18 want to stop using these items? Sure, but  
19 there is no fully proven alternative.

20 So, we have a choice here. We can  
21 hamstring the organic farmer and stop making  
22 organic applesauce for our kids or we can

1 ground this discussion in both science and  
2 reality. The choice is clear to Bill. These  
3 are essential tools as part of an integrated  
4 pest control strategy and can be used  
5 responsibly, so organic farmers can bring  
6 apples and pears successfully to market.

7 Does anyone in this room still  
8 have a nickel in your pocket? Well, according  
9 to the recommendation on the table, you are  
10 putting yourself at risk. So, please go put  
11 your nickels in the toxic nickel collection  
12 containers out in the hallway.

13 But, seriously, pecan pie is the  
14 same story. It is well understood that pecans  
15 need trace amounts of nickel. And when pecan  
16 trees are suffering a deficiency --

17 CHAIR MIEDEMA: Thank you.

18 MS. MIARS: -- they need to  
19 receive it quickly and efficiently.

20 CHAIR MIEDEMA: Thank you, Peggy.

21 MS. MIARS: Oh, I'm sorry.

22 CHAIR MIEDEMA: That's okay.



1 MS. MIARS: Sorry.

2 CHAIR MIEDEMA: Okay.

3 MS. MIARS: I thought it was my  
4 one-minute warning.

5 CHAIR MIEDEMA: Any questions?

6 (No response.)

7 MS. MIARS: Thank you.

8 CHAIR MIEDEMA: Thank you.

9 Callyn? And Garth Kahl, you are  
10 standing by.

11 MS. KIRCHAR: My name is Callyn  
12 Kirchar. I am Farm Program Technical  
13 Specialist for Oregon Tilth, and today I will  
14 be commenting on the Livestock Committee  
15 proposed recommendations.

16 We greatly appreciate the  
17 Committee's work and their willingness to  
18 discuss these proposals with us during this  
19 week. We have talked during breaks, lunches,  
20 dinners, and one impromptu discussion that  
21 occurred in the bathroom.

22 Oregon Tilth's written comments on

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1 these subjects detailed the specific sections  
2 of the proposals that we found to be in some  
3 cases unclear and conflicting. I will not go  
4 into those specific examples today.

5 Today I wanted to bring to light  
6 the far-reaching effects of these proposed  
7 recommendations and the need to obtain all of  
8 the necessary industry input.

9 Oregon Tilth notified all of our  
10 organic producers of the Livestock Committee  
11 recommendations, but, due to the short  
12 timeline and the time of year, we,  
13 unfortunately, received very little  
14 correspondence from them.

15 We appreciate that the Committee  
16 is willing to incorporate input from those  
17 folks that are here prior to the Friday  
18 voting. However, we would like to see that  
19 all organic producers have the ability to  
20 comment on these proposed recommendations.

21 It was noted by the Board that we  
22 have discussed this issue for a long time, but

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1 we have had changes to the recommendations  
2 themselves as recently as yesterday, which  
3 gives producers no time for input prior to the  
4 vote.

5 The producers' perspective is very  
6 important to this decision. Robin from CCOF  
7 said it very well, and I would agree that we  
8 have found with the pasture rule regulation we  
9 have clients that clearly meet the regulation,  
10 but are having difficulty keeping up with the  
11 amount of paperwork in order to prove it.  
12 And we all know as auditors that, if it wasn't  
13 written down, it didn't happen.

14 For significant rule changes such  
15 as this, where modifications will need to be  
16 made to all organic operations and  
17 recordkeeping and time, there needs to be a  
18 look at the industry impact. Looking at the  
19 economic viability of organic producers is not  
20 counter to the intentions of organic  
21 agriculture.

22 I have heard commenters also this

1 week state that it is the end consumer that is  
2 the most important. However, looking at  
3 producer viability is very important as well.  
4 Without organic farmers, processors, and  
5 handlers, there is no organic food.

6 We wholeheartedly agree with MOSA  
7 who stated that they could have a producer  
8 poll about the impacts of these  
9 recommendations and provide any other data  
10 that you would like to see. If this is done,  
11 please include Oregon Tilth in this effort.

12 We also agree with other  
13 commenters today. Please take all of the  
14 public comment into account, put it into one  
15 document, so that we can see everything  
16 together, including have it combined against  
17 as it was when it was first presented and  
18 bring it back to the fall 2011 meeting. We  
19 can drum up more comment from our producers by  
20 then.

21 Thank you.

22 CHAIR MIEDEMA: Thank you.

1 MS. KIRCHAR: Thank you.

2 CHAIR MIEDEMA: Any questions for  
3 Callyn?

4 (No response.)

5 All right. Garth Kahl, you're up  
6 next.

7 Jason Woulfin, you're standing by.

8 MR. KAHL: Hello. My name is  
9 Garth Kahl.

10 And I, first of all, want to thank  
11 all you brain-dead people for suffering  
12 through this. You are probably, well, almost  
13 undoubtedly, more brain-dead than all the rest  
14 of us in here put together. So, thank you.

15 (Laughter.)

16 Since 1996, I have worked as an  
17 organic inspector, consultant, and hired  
18 policy wonk for over a half dozen certifiers,  
19 including my current employer, Oregon Tilth,  
20 whose views are not necessarily reflected in  
21 my comments.

22 As regards my current comments, I

1 am also co-owner of Common Treasury Farm, a  
2 diversified crop and livestock operation that  
3 has been certified since 1993. Common  
4 Treasury Farm produces certified organic  
5 blueberries, vegetable starts, seeds, locker  
6 lambs, and eggs.

7 Today I want to specifically  
8 address a number of issues: the vote to allow  
9 magnesium sulfate to Sunset and, secondly, the  
10 impact of any proposed change to the rule,  
11 especially animal welfare standards, and what  
12 they would have on producers and inspectors.

13 Magnesium sulfate. This material  
14 with its current annotation requiring  
15 documented soil deficiency is a valuable tool  
16 for producers. On my own farm we use cover  
17 crops, vermicompost, kelp, and dolomite to  
18 supply micronutrients, including magnesium.  
19 Even so, on particular crops, especially  
20 garlic and onions, we have found foliar  
21 applications of this material to be a very  
22 valuable tool.

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1           In spite of the lack of a complete  
2           technical review and the fact that there does  
3           not at least appear to be any widespread human  
4           health, environmental, or other adverse  
5           effects from the use and manufacture of this  
6           product -- heck, thousands a people a day soak  
7           their feet in it -- the Crops Committee chose  
8           to recommend its removal from the list.

9           This would result not only in the  
10          loss of another tool for organic producers,  
11          but an additional burden on producers,  
12          inspectors, and certifiers who will then have  
13          to document that only non-synthetic sources  
14          are used.

15          An uninformed observer might,  
16          watching the proceedings this week, conclude  
17          that there is a rampant attitude of, hey,  
18          let's whack some low-lying synthetics because  
19          we can.

20          I would urge that the Board please  
21          remember that every change to the National  
22          List represents in the aggregate massive

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1 additional hours for inspectors, reviewers,  
2 and certifiers, and an additional cost to  
3 producers in the form of longer inspections,  
4 discarded materials, and possibly responses to  
5 non-compliances or even the loss of certified  
6 ground. The National List should not be  
7 changed without taking into full account the  
8 economic effects on all parties involved,  
9 particularly growers.

10 With respect to the animal welfare  
11 standards, I would just conclude that my farm  
12 could easily comply with them, but I will also  
13 conclude that this year I spent more time  
14 doing animal and crop OSPs than I did filling  
15 out my taxes, which included a 1040, a  
16 Schedule C, and a Schedule F. And I am an  
17 "organicrat". I have been doing this for 15  
18 years for multiple certifiers on multiple  
19 continents in multiple languages.

20 It is a burden. It is coming down  
21 on producers, and they are going to leave.  
22 They are going to go to natural certified.

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1 They are going to balk.

2 So, we need to do something about  
3 this. Please consider that as you make  
4 changes.

5 Thank you.

6 CHAIR MIEDEMA: Thank you, Garth.

7 (Applause.)

8 MR. KAHL: Any questions?

9 CHAIR MIEDEMA: Nick Maravell?

10 MR. MARAVELL: Yes, I would just  
11 like you to fill in a little more detail.  
12 What makes you say that organic producers  
13 might go to other certification-type programs?

14 MR. KAHL: They already are. In  
15 my experience, I know -- sorry.

16 MR. MARAVELL: You actually have  
17 examples, anecdotal examples?

18 MR. KAHL: I have anecdotal  
19 examples of at least two who have abandoned  
20 organic certification in favor of natural,  
21 particularly beef production, because they  
22 didn't want to deal with the pasture rule.

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1 And there's others. I mean, you know, in our  
2 area Farm Alliance here in the Pacific  
3 Northwest, they are strong and there's a lot  
4 of people that think that Farm Alliance is  
5 better, although they still allow glyphosate.

6 I mean it is happening. People  
7 are leaving. Producers are leaving. And the  
8 recordkeeping requirements and the burden of  
9 certification is part of it.

10 CHAIR MIEDEMA: Jay Feldman?

11 MR. FELDMAN: If I understand you  
12 correctly, you are saying the proposal before  
13 the Board is too stringent for growers?

14 MR. KAHL: With respect to which?

15 MR. FELDMAN: Animal welfare.

16 MR. KAHL: Animal welfare, I would  
17 echo the comments that other people have been  
18 making all afternoon. It needs to be done  
19 very carefully. I agree that there needs to  
20 be an improvement in animal welfare standards,  
21 but it needs to be handled very carefully and  
22 it needs to be done in a way that does not

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1 unduly burden producers, and that producers  
2 have a lot of notice, like a big sign that  
3 says, "This is coming. By the way, this is  
4 coming. Oh, yeah, this is going to come."

5 It needs to be implemented slowly  
6 and carefully. Producers need that because  
7 they are busy doing other things. They are  
8 not watching what policy is doing. They are  
9 trying to farm. And, then, the inspector gets  
10 out there and says, "You're non-compliant.  
11 You have 30 days to respond to this non-  
12 compliance or, boom, you're suspended." It  
13 has just got to be more sensitive to the folks  
14 on the ground out there.

15 Thank you.

16 (Applause.)

17 CHAIR MIEDEMA: Thank you.

18 Jason Woulfin?

19 MR. WOULFIN: Well, good  
20 afternoon, and I commend all of you on your  
21 stamina today. This has been an impressive  
22 process for me as a first-time attendee to see

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1 all of this.

2 My name is Jason Woulfin. I am  
3 with SQM and, as you probably know, we are a  
4 producer of natural sodium nitrate.

5 I simply wanted to shed some light  
6 on SQM's stats and claims of statements of  
7 support and petitions that have been presented  
8 to the NOSB so far at this meeting.

9 Regarding the statements of  
10 support, we did hire a company to contact  
11 people within the organic community,  
12 specifically targeting organic farmers as  
13 certified on the documents we found. This was  
14 done specifically because users of natural  
15 Chilean nitrate began contacting us with  
16 statements of support, asking how to  
17 communicate this properly to the Board.

18 We felt that, as significant  
19 industry support was cited as a reason for  
20 considering the removal of the annotation by  
21 the Crops Committee, we felt we needed to find  
22 an effective means for displaying that there

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1 is actually significant industry support for  
2 keeping the annotation regarding the use of  
3 natural Chilean nitrate and bridging the  
4 communication gap we felt existed in  
5 portraying this information.

6 The intention of this program was  
7 to contact individuals within the organic  
8 community, capture statements of support as it  
9 relates to the continued use of natural  
10 Chilean nitrate. Upon confirming if the  
11 individual wished to make a statement of  
12 support, the individual was informed that they  
13 would be recorded and their comment would be  
14 shared with the NOSB.

15 Via this process, 273 individual  
16 comments of support from up to 40 different  
17 states were recorded and transcribed to the  
18 regulations.gov web page.

19 For anyone concerned as to  
20 misrepresentation, you can clearly search the  
21 web page to view a statement. These  
22 statements range from quite technical to

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1 general and were not edited or reviewed by SQM  
2 in any way prior to being submitted via a  
3 third-party company to the NOSB web page.

4 If needed, we can also provide  
5 full copies of the recordings for any  
6 statement of support that was submitted to the  
7 NOSB on behalf of one of these individuals.

8 Separately, the petition that was  
9 formally submitted to the NOSB on Tuesday by  
10 Emmanuel De Marez with a little over 500  
11 signatures was a written petition that went to  
12 individual organic farmers throughout many  
13 states for their signatures, if they chose to  
14 support it. These were sent back to SQM  
15 through various channels prior to submitting  
16 to the NOSB.

17 Referring to another comment made  
18 earlier regarding usage in the State of  
19 Washington, I would like to just note that  
20 close to 20 percent of the signatures did come  
21 from the State of Washington in support of the  
22 Chilean nitrate.

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1 Thank you.

2 CHAIR MIEDEMA: Thank you very  
3 much.

4 Any questions for Mr. Woulfin?

5 (No response.)

6 Thank you.

7 We are almost done. We asked the  
8 Materials Committee last meeting to take a  
9 look at flavors and the notion of forming a  
10 Flavors Task Force. In the shuffle of  
11 priorities, it was not deemed something that  
12 NOP could take on right now, forming a task  
13 force. And the industry came together to form  
14 their own Flavors Task Force.

15 We have asked if we could get a  
16 quick update from the Flavors Task Force.  
17 This wasn't on the agenda, however. And so,  
18 just to make sure we are following our  
19 processes, it would take about three minutes,  
20 and I would ask NOSB members if they would be  
21 willing to make this change to the agenda with  
22 a show of hands.

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1 All in favor of hearing from the  
2 Flavors Task Force?

3 All opposed?

4 We have two representatives from  
5 the Flavors Task Force, Gwendolyn Wyard and  
6 Julie Weisman. Please approach the podium.

7 Mac?

8 MR. STONE: While they are coming,  
9 I need to acknowledge that I was asked by  
10 Steve to represent the Board in their Task  
11 Force and listen into the phone calls, and I  
12 was not able to do so. So, I wanted to  
13 acknowledge that.

14 Sorry about that, Steve.

15 CHAIR MIEDEMA: No problem. You  
16 can catch up.

17 (Laughter.)

18 MS. WYARD: Hello. My name is  
19 Gwendolyn Wyard.

20 MS. WEISMAN: My name is Julie  
21 Weisman.

22 And we co-chair the OTA Flavor



1 Task Force.

2 This was originally signed up for  
3 public comment because we knew we were not on  
4 the agenda, and we relinquished that spot.  
5 But we are going to keep it to three minutes,  
6 which we are going to use to introduce the OTA  
7 Flavor Task Force and draw your attention to  
8 the comments that we submitted to  
9 regulations.gov regarding what is a non-agenda  
10 item for this meeting.

11 And I think people who have been  
12 on the Board for a while have heard some of  
13 this dilemma and discussed it. So, for those  
14 of you who are new, basically, flavors are  
15 allowed, non-agricultural, non-synthetic  
16 ingredients, under 205.605(a) of the National  
17 List since the National Organic Program's  
18 inception, with no requirement to source  
19 organic alternatives.

20 At the same time, we have a  
21 steadily-increasing number of certified  
22 organic flavors. And while the percentage of

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1 organic flavors compared to their conventional  
2 counterparts is very small, and for certain  
3 types don't exist at all, organic flavors are  
4 available, and they have been for a long time.

5 So, the issue, then, becomes one  
6 about, because flavors are a broad category,  
7 of agricultural ones and non-agricultural  
8 classification, so, therefore, commercial  
9 availability requirements.

10 The National Organic Standards  
11 Board at the October 2010 meeting in Madison  
12 recommended the formation of a Task Force on  
13 Flavors, and the NOSB responded to their  
14 request in a December 17th, 2010, response  
15 memorandum which stated the following:

16 MS. WYARD: Now it is my turn.

17 "The NOP concurs with the need for  
18 a more extensive review of the category of  
19 flavors currently listed on 205.605(a) to  
20 determine if there are flavors that should be  
21 considered agricultural and required to be  
22 organically-produced. The NOP does not

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1 believe there is a need for an NOP-sponsored  
2 task force on flavors at this time. The NOP  
3 believes the formation of an informal industry  
4 group to develop a flavor recommendation for  
5 the NOP to consider would be accomplished more  
6 effectively through an industry-formed group."

7 In response to the NOP and the  
8 need for an information industry task force,  
9 OTA invited interested parties to join such a  
10 group. The OTA Flavor Task Force is comprised  
11 of 12 members and has been meeting once a week  
12 since February 18th of 2011.

13 We have the list of participants  
14 up on the slide there. As you can see by this  
15 list, we have an experienced, knowledgeable,  
16 and well-rounded representation, including  
17 former NOSB members, current NOSB member.  
18 Thank you, Mr. Mac Stone; we will look forward  
19 to you on the next calls. We have got flavor  
20 manufacturers and end-users, consultants, and  
21 the primary trade association for the flavor  
22 industry.

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1           We have completed our first round  
2 of work, accomplishing our first  
3 recommendation. Understanding that flavors  
4 are not on the agenda for this meeting, again,  
5 we simply want to make the Board aware of the  
6 OTA Flavor Task Force and draw your attention  
7 to our written comments and our  
8 recommendation.

9           Additionally, we respectfully  
10 request that the treatment of natural flavors  
11 on the National List becomes a Handling  
12 Committee work plan item for the fall meeting.

13           The Task Force plans to continue  
14 our work, and we look forward to providing the  
15 NOSB with a complete presentation at the fall  
16 meeting.

17           Our comments can be found at  
18 regulations.gov, Comment No. -- time to write  
19 this own -- AMSNOP1100143182. And you also  
20 should have them in your book.

21           So, thank you very much.

22           CHAIR MIEDEMA: Thank you.

1 MS. WYARD: We really appreciate  
2 your time.

3 CHAIR MIEDEMA: Thank you.

4 Any questions for representatives  
5 of the industry Flavors Task Force? Steve?

6 MR. DeMURI: Not so much a  
7 question, but a comment. You guys did a  
8 tremendous amount of work in two months. So,  
9 thank you very much. You have made great  
10 progress already.

11 CHAIR MIEDEMA: All right. Super.

12 Before we recess for the day, I  
13 want to remind NOSB members that we may have  
14 some edits to do in Committee based on the  
15 last few days. Please make sure you check in  
16 with your Committee Chairs before you leave  
17 the room this evening.

18 And we will reconvene at 8:00 a.m.  
19 tomorrow for voting.

20 Thank you.

21 (Whereupon, at 6:06 p.m., the  
22 above-entitled matter went off the record.)

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This is to certify that the foregoing transcript


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Before: USDA

Date: 04-28-11

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was duly recorded and accurately transcribed under my direction; further, that said transcript is a true and accurate record of the proceedings.

  
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