

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

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MEETING OF THE NATIONAL ORGANIC
STANDARDS BOARD (NOSB)

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MONDAY

APRIL 9, 2013

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The National Organic Standards Board convened at 8:00 a.m. at the Hilton Portland & Executive Tower, 921 Southwest 6th Avenue, Portland, Oregon, Mac Stone, Chairperson, presiding.

MEMBERS PRESENT

MAC STONE, Chairperson

HAROLD AUSTIN

CARMELA BECK

COLEHOUR BONDERA

JOSEPH DICKSON

TRACY FAVRE

JAY FELDMAN

JOHN FOSTER

WENDY FULWIDER

NICHOLAS MARAVELL

JEAN RICHARDSON

ZEA SONNABEND

JENNIFER TAYLOR

FRANCIS THICKE

CALVIN WALKER

STAFF PRESENT

MILES McEVOY, Deputy Administrator, National
Organic Program

MICHELLE ARSENAULT, Advisory Board Specialist

MELISSA BAILEY, Director, Standards Division,
National Organic Program

LISA BRINES, Standards Division, National
Organic Program

TABLE OF CONTENTS

| | |
|-----------------------------------|-----|
| Call to Order | |
| By Mac Stone | 4 |
| Secretary's Report | |
| By Dr. Calvin Walker | 24 |
| National Organic Program Update | |
| By Miles McEvoy | 25 |
| Open Public Comment | 67 |
| Materials Subcommittee | |
| By Zea Sonnabend | 284 |
| Public Comments Related to | |
| Materials Subcommittee | 304 |
| GMO ad hoc Subcommittee | |
| By Dr. Jennifer Taylor | 320 |
| Public Comments Related to | |
| GMO AD HOC Subcommittee | 337 |
| Adjournment | 397 |

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

2 8:01 a.m.

3 CHAIRPERSON STONE: I'd like to
4 have everyone's attention. I'd like to go
5 ahead and get the spring meeting of the NOSB
6 in order. We have a very aggressive agenda,
7 so we're going to be quite diligent at trying
8 to stay on time out of respect for those of
9 you with public comment. We want to get as
10 much as we can from you as we go forward.

11 First, I want to thank the Board
12 for the opportunity to serve as a chair. It's
13 very rewarding to have the opportunity to such
14 diligent and dynamic brain trusts that we work
15 with. I thank the audience and thank all of
16 you all for taking your time and your hard-
17 earned money to be here. It's very important,
18 your written comments, your interest and
19 attention to detail. We take it very
20 seriously.

21 Since the written comment period
22 closed, this group of people has had a lot of

1 very intense conversation based upon your
2 all's input. And, again, we look forward to
3 public in-person input, both from the podium
4 and in the hallway and at dinner, etcetera.
5 So we highly value your all's input.

6 Remind you to please turn your
7 cell phones off, including Board members. We
8 do have a policy. Cell phones that go off get
9 to buy the first round, depending on how many
10 rounds there are.

11 So at this time, we have one new
12 Board member, Francis Thicke, over here. But
13 I think Colehour will start to my left. If
14 you introduce yourself, a little bit about
15 your background, what committees you serve on,
16 and we'll work around the table.

17 MEMBER BONDERA: Okay. Thank you
18 very much, Mac, and thank you all of you being
19 here to help us move forward. My name is
20 Colehour Bondera. I am a very small-scale
21 farmer in the state of Hawaii. I am not at
22 work right now because that's my work is

1 farming.

2 So I serve on -- I was going to
3 give a number, and I can't recall the number,
4 so I'll just list them. I serve on the
5 Livestock Subcommittee. I am chair of the
6 Policy Development Subcommittee. And I serve
7 on the Crop Subcommittee, as well as the Ad
8 Hoc GMO Subcommittee. And I think that that's
9 that. Thank you.

10 MEMBER FAVRE: My name is Tracy
11 Favre. I am currently chair of the Livestock
12 Subcommittee. I also serve on Materials and
13 Handling Committees and the CACS Subcommittee.
14 I spent 18 years as an environmental engineer
15 and, most recently, the last four years, in
16 sustainable ag, training farmers on
17 sustainable management practices. And I'm
18 happy to be here.

19 MEMBER BECK: Good morning. My
20 name is Carmela Beck, and I work at Driscoll
21 Strawberries Associates based out of
22 Watsonville, California. I've been there the

1 past six years. I manage the organic
2 certification program for our independent
3 growers. I sit on the Crops, the Handling,
4 and the Compliance, Accreditation, and
5 Certification Subcommittees. And it's also a
6 pleasure to be here. Thank you.

7 MEMBER SONNABEND: Good morning.
8 My name is Zea Sonnabend from Watsonville,
9 California. I am in the scientist seat. I
10 work for California Certified Organic Farmers
11 as a policy specialist and a farm inspector
12 for California's certification services. I
13 have a small farm, Fruitilicious Farm, where
14 we grow apples and other fruit. And I serve
15 on the review panel and I'm one of the co-
16 founders of Organic Materials Review
17 Institute.

18 MEMBER FELDMAN: Good morning.
19 I'm Jay Feldman. I serve on the Crops,
20 Materials, Policy Development, Ad Hoc GMO, and
21 the Inerts Working Group. I'm the executive
22 director of Beyond Pesticides in Washington

1 D.C. I've been doing that since 1981, where
2 we work with farmers, consumers,
3 environmentalists to reverse some of the
4 environmental and public health problems we
5 suffer from in chemical intensive agriculture,
6 such as autism, learning disabilities,
7 intersexed fish, cancer, hormone disruption,
8 and a whole host of environmental
9 contamination issues related to water quality
10 and food safety. So we have an intense and I
11 personally have an intense desire to grow
12 organic with public trust and integrity to
13 ensure that organic becomes the mainstream
14 form of agriculture in this country. Thank
15 you.

16 MEMBER RICHARDSON: Good morning.

17 I'm Jean Richardson from Vermont. I'm a
18 consumer public policy representative. I
19 serve on Accreditation, Livestock, GMO Ad Hoc,
20 GMO Vaccine Working Group, and Handling. I am
21 an organic maple syrup producer, and we're
22 boiling, probably right now as we speak, and

1 I'm missing out on that, but my kids are doing
2 it. I've farmed a whole range of animals
3 organically in the past. Again, my kids are
4 doing that now. And I'm an organic inspector.

5 MEMBER DIXON: Good morning. My
6 name is Joe Dixon, and I am from Austin,
7 Texas. I occupy the retailers seat on the
8 Board. I am currently the quality standards
9 coordinator at Whole Foods Market. I work as
10 part of a group there that sets the company
11 standards on the products we sell and works on
12 issues of food policy and food integrity and
13 organic certification. I serve on the
14 Livestock Committee, the Materials
15 Subcommittee, the Handling Subcommittee, and
16 the Compliance, Accreditation, and
17 Certification Committee.

18 MR. FOSTER: My name is John
19 Foster. I'm just starting my fourth year on
20 the Board here. I'm in one of the two handler
21 positions. I live in Santa Cruz, California.
22 I'm the director of compliance for quality

1 food safety and organic integrity at
2 Earthbound Farm. I chair the Handling
3 Committee. I'm on Crops, CACS, Policy,
4 Executive. I think that's it. As usual,
5 very, very happy to be here and happy to take
6 part in a great process.

7 CHAIRPERSON STONE: My name is Mac
8 Stone on the certifier seat. Currently,
9 again, honored to be Chair of the Board. I
10 farm with my wife and her family organic in
11 Kentucky, serve on CACS and Livestock this
12 term.

13 MEMBER WALKER: Good morning. My
14 name is Calvin Walker. I'm a native of
15 Louisiana. I serve on the Certification,
16 Policy, Livestock, Materials, and GMO Ad Hoc.
17 My real job is program leader for animal
18 science, plant science, and agriculture
19 economics at Southern University in Baton
20 Rouge. And I have a host of other interests
21 recently, dealing with oil and gas and land
22 development. Thank you.

1 MEMBER FULWIDER: I am Wendy
2 Fulwider, and I am on the Board as a producer.
3 I am currently on the Livestock and Materials
4 Committees. I work at Crop Cooperative as
5 their animal care specialist. I own a
6 certified organic farm in Wisconsin, and this
7 fall my son will be an organic dairy producer.
8 Thank you.

9 MEMBER AUSTIN: Good morning. My
10 name is Harold Austin. I'm the director of
11 orchard administration with Zirkle Fruit
12 Company, a grower. We produce apples, pears,
13 cherries, blueberries, wine grapes, both
14 conventionally and 42 percent of our total
15 production now is transitioned and is
16 certified as organic in Eastern Washington.
17 And I serve also on Washington State
18 Department of Ag's Organic Advisory Board.
19 I'm the Vice Chair of the Handling Committee.
20 I sit on the CACS Committee, and I'm also on
21 the Crops Committee, as well.

22 MEMBER TAYLOR: Good morning. I'm

1 Jennifer Taylor from Florida A&M University.
2 I'm from Tallahassee, Florida, and I am
3 coordinator of small farm programs at Florida
4 A&M University. I serve on the Materials
5 Committee as Vice Chair, the Policy
6 Development Committee, and I am Chair of the
7 GMO Ad Hoc Subcommittee. I represent public
8 interest and consumer interest on the Board.

9 MEMBER MARAVELL: My name is Nick
10 Maravell. I'm a producer representative. For
11 over three decades, I've been an organic
12 farmer: crops, livestock, farm processing,
13 etcetera. I serve on the Crops Committee, the
14 Livestock Committee, the Handling Committee,
15 and the Policy Committee, and the Ad Hoc
16 Committee or the Ad Hoc -- I don't know.
17 Whatever it is. The GMO Vaccine Committee,
18 vaccines made with excluded methods, working
19 group.

20 MEMBER THICKE: I'm Francis
21 Thicke. I'm an organic grass-based dairy
22 farmer from Iowa. We process our milk on the

1 farm and market it all locally. I'm also a
2 soil scientist by training, and I worked at
3 USDA in Washington in the past as a national
4 program leader for soil science for the
5 extension service. I'm on the Crops Committee
6 and the Livestock and the GMO Ad Hoc, and I
7 serve on the environmental position here on
8 the Board.

9 CHAIRPERSON STONE: All right.

10 Thank you very much. If we move on around,
11 and, Miles, just introduce yourself and work
12 through the program here.

13 MR. MCEVOY: Good morning. Miles
14 McEvoy, deputy administrator for USDA's
15 National Organic Program. It's great to be
16 here. I just want to recognize all the
17 service, the countless hours that the Board
18 has put in over the last six months to come up
19 with these proposals. The work that the Board
20 does is really essential to the success of the
21 organic industry and organic agriculture, and
22 you guys deserve a lot of praise for the work

1 that you've done. Thanks.

2 MS. BAILEY: Good morning,
3 everybody. My name is Melissa Bailey. I
4 serve as director for the Standards Division
5 at the National Organic Program at USDA.
6 Great to be here. Glad to see everybody's
7 faces again. Our work in the Standards
8 Division, we work with all of the Board
9 members on their issues. In particular, I've
10 worked with Nick and Jean on the Vaccines Made
11 with Excluded Methods Working Group, as well
12 as on the GM Ad Hoc Committee. But myself and
13 the whole Standards team interfaces with these
14 folks on a daily basis on all of their
15 subcommittee calls, so, hopefully, that's been
16 helpful.

17 The Standards Division is also
18 responsible for all the rulemaking work that
19 goes on, much of the guidance development, and
20 things related to that. So I look forward to
21 a great meeting.

22 DR. BRINES: Good morning. My

1 name is Lisa Brines. I also work in the
2 Standards Division of the National Organic
3 Program as the national list manager. I also
4 work closely with members of the Board,
5 particularly the Materials Subcommittee and
6 also the Inerts Working Group. Thanks.

7 MS. ARSENAULT: Good morning. My
8 name is Michelle Arsenault. I'm in charge of
9 all the logistics for the Board. I'm the
10 Advisory Board specialist. If you have any
11 questions, please come ask me. And I've been
12 in this position just over a year now. I just
13 celebrated my year anniversary, and I want to
14 reiterate what I said at the last meeting that
15 this is the hardest working bunch of people
16 I've ever worked with, very dedicated, very
17 passionate. I talk to them more than I talk
18 to my family. We have weekly conference
19 calls, many weekly conference calls, and they
20 call in from vacation, they call in from their
21 offices, they call in while they're on the
22 road traveling to do inspections, they call in

1 from every bridge in Louisiana. And so it's
2 a great group of people. I love my job. And
3 welcome. I hope we have a good meeting.

4 CHAIRPERSON STONE: Thank you.
5 And Michelle does way more than that. She
6 keeps us with so much on our behalf so that we
7 can concentrate on the issue at hand and the
8 mechanics. We depend on her so very much, not
9 just logistics of the meetings but the
10 documents and the work plan, et cetera. So,
11 Michelle, I want to give a real shout out to
12 you and appreciate so much all the work that
13 you do.

14 I know there are several former
15 Board members in the audience. If you would
16 raise your hand and stand so others may see
17 you. I just want to appreciate all that
18 you've done to make our job what it is. We
19 want to honor the work that you've done
20 getting us to this point. So thank you all
21 for being here, and I'm sure each of us will
22 lean on you at some point in the next few days

1 for advice.

2 At this time, I've asked Jean if
3 she would say a note, say a word, kind of set
4 the tone for this spring meeting. Jean?

5 MEMBER RICHARDSON: Mike asked me
6 to find some sort of quotation that would set
7 the tone for the meeting, as he said. So I
8 found a short "Prayer for Spring" by Robert
9 Frost, who was a farmer and a poet laureate in
10 Vermont. "Oh, give us pleasure in the flowers
11 today and give us not to think so far away as
12 the uncertain harvest. Keep us here all
13 simply in the springing of the year. Give us
14 pleasure in the orchard white, like nothing
15 else by day, like ghosts by night. And make
16 us happy in the happy bees, the swarm dilating
17 round the perfect trees. And make us happy in
18 the darting bird that suddenly above the bees
19 is heard, the meteor that thrusts in with
20 needle bill and off a blossom in mid air
21 stands still."

22 CHAIRPERSON STONE: Thank you,

1 Jean. That was very nice. So work through a
2 little logistics here we wrestled with. We've
3 gone to a three-day meeting. There's some
4 budgetary considerations in that decision. We
5 have an extremely tight schedule. Michelle
6 worked with Executive Committee and
7 individuals and changed it, hourly it seemed
8 like, a couple of weeks ago.

9 So, again, we want to respect
10 everyone's time. We want to have time for
11 open and lively debate and discussion. So
12 just be considerate when it's coming to the
13 podium, et cetera, and the Board members are
14 going to respect that, as well.

15 We did address some special
16 requests because of people's travel schedules,
17 etcetera. So, again, I want to thank Michelle
18 and the Board members. Because we value your
19 input, we did make those special
20 considerations to give each of you all
21 opportunity to address the Board.

22 We have the agenda before us. I

1 ask the Board members is there any amendments
2 or adjustments to the agenda that you
3 recommend? Seeing none, I'll take that as
4 approval of the agenda.

5 So this is our opportunity --
6 working with this Board, we often disagree
7 without being disagreeable. And I think it's
8 really a valuable sort of approach that we
9 have. We're very passionate about our views.
10 So I just want to remind us, as a group, that
11 we may not have full agreement in the voting
12 process, but I would hope that we go away with
13 100-percent acceptance of the decisions that
14 are made here and advance the industry in a
15 united front. I think it can be very
16 valuable.

17 As far as the public comment, in
18 order to get Michelle, we had 150 and some odd
19 people to sign up. We worked it through. So
20 the Board made a decision that last meeting we
21 went to a four-minute public presentation, and
22 we had three minutes, I think, for questions.

1 This agenda is based on five minutes per
2 person, but we left the presentation at four
3 minutes because hearing you all is what's
4 important.

5 So the Board is going to be
6 sitting on their hands a little bit in the
7 questioning. If you don't get a question,
8 it's not that we didn't appreciate or want to
9 follow-up with you. We're sort of managing
10 the time so that everyone will have access.

11 We just wanted you to know the
12 Board unanimously felt like the four-minute
13 presentation to give you all more time than us
14 to ask questions. So we're a little anxious
15 about how that's going to work, so we're sort
16 of, we'll work through that. We're willing to
17 stay a little longer if we need to to work
18 through all of the decision-making that we
19 have before us.

20 If you weren't here in the fall,
21 Michelle has found us the stoplight. So when
22 you come to the podium, you have four minutes.

1 When you see the little yellow light, then it
2 goes to red. I ask you to respect the red
3 light so that you can see -- the yellow light
4 will let you know that you better finish up
5 out of respect to your fellow audience members
6 to have their same four minutes.

7 In the vein of continuous
8 improvement, which is the overarching aspect
9 of the Organic Program -- yes, ma'am?

10 MS. ARSENAULT: I just want to say
11 one thing about when the red light goes off
12 there's also a very loud obnoxious beep, so
13 you'll know.

14 CHAIRPERSON STONE: And Michelle
15 is sitting right next to you, by the way. In
16 the vein of continuous improvement, this
17 agenda, this Board is drilling down further
18 for those Board members that came before us
19 and made some very tough decisions. Now we're
20 in a position at this stage of maturity, we're
21 in our 11th year, I guess, Miles, as a
22 program, that we're drilling down a little

1 deeper. So how we go about further refining
2 the process and the products that we produce,
3 just glad to have the opportunity in how we do
4 that with the times and restraints that hinder
5 us all in doing what we exactly would like to
6 do.

7 There's been some public comment
8 and constant debate among the Board members,
9 if you will, on this declaration of interest.
10 Each of us, as we went around, we declared
11 what group we represent. So there's an
12 inherent interest that we have. There's not
13 an inherent conflict of interest. There's an
14 inherent interest that we bring to our
15 position at the Board.

16 So the Board discusses this when
17 we develop our work plan, which we will post
18 on Thursday, be further refined in committee
19 a little bit. But we want you to know very
20 transparently this is what our work plan is.
21 Each subcommittee works with the subcommittee
22 chair, works with Executive Committee if they

1 declare a certain interest or potential
2 conflict. So we, as a board, discuss this and
3 come to an agreement of where an individual
4 Board member stands on a given material or a
5 given discussion.

6 We also have, because we're a FACA
7 board under the USDA, have strict
8 administrative policy that we work under. And
9 the program sort of has oversight to that and
10 can help guide us if there's some debate in
11 our decision-making as a board. I just wanted
12 you to know that the Board makes its own
13 decision and the program has our back, so to
14 speak.

15 Miles will talk in a few minutes
16 about a Sound and Sensible. Again, as the
17 program matures into its 11th year, we are
18 looking at ways to be welcoming and inviting
19 and make sure we gain as many new operations,
20 handling and farming operations. So I think
21 you'll be excited about some of the work that
22 not just the folks at the table but Miles has

1 a staff of about 30 people in D.C. and around
2 the country that just work equally as hard as
3 Michelle does in their respective areas and,
4 again, making this a more inviting program for
5 all of us because of their hard work.

6 At this time, I'll ask Calvin, as
7 Secretary, we need to approve or accept the
8 minutes of the previous two meetings.

9 MEMBER WALKER: Thank you, Mac.
10 First, we'll do a little housecleaning and we
11 will ask the Board to approve the May of 2012
12 transcript of our biannual meeting in New
13 Mexico, as well as the voting record. And I
14 believe we'll do this by voice vote, as
15 opposed to an individual vote, if that's okay
16 with everyone.

17 CHAIRPERSON STONE: So you all
18 received those transcripts. Is there any
19 clarifications? Okay. All in favor, say aye.

20 (Chorus of ayes.)

21 MEMBER WALKER: The next one will
22 be the October 2012 Providence, Rhode Island

1 transcript and voting record.

2 CHAIRPERSON STONE: Any
3 clarifications, questions? All in favor, say
4 aye.

5 (Chorus of ayes.)

6 CHAIRPERSON STONE: Very good.
7 Thank you. Good. Thank you, Calvin. So,
8 last, I just want to make sure, some of you
9 may not be able to stay until Thursday but to
10 let everyone know that I'll be fortunate to be
11 hosting this meeting in the land of the last
12 two national championship basketball teams in
13 Louisville in the fall. So welcome you to,
14 invite you to Louisville in October. It's a
15 beautiful time to be there, so we look forward
16 to hosting the meeting in Louisville in
17 October.

18 With that, I'll turn it over to
19 Miles. Thank you, Miles.

20 MR. MCEVOY: All right. Just
21 getting set up here. Okay. We're going to
22 start with a celebration of Portland here,

1 just to get everybody in the right mood. We
2 have a little clip from the Portlandia series
3 here. It's both a celebration of Portlandia
4 and the very difficult decisions that you have
5 to do here at the NOSB. So let's let it roll
6 here.

7 (Whereupon, the following video
8 was presented.)

9 FEMALE SPEAKER 1: Thank you for
10 buying me that bag the other day.

11 MALE SPEAKER: Come on. It's more
12 for me than you.

13 FEMALE SPEAKER 1: God, you have
14 beautiful eyes.

15 MALE SPEAKER: Everyone tells me
16 that.

17 FEMALE SPEAKER 1: I'm the only
18 one that told you that.

19 MALE SPEAKER: No, I don't mean,
20 like, in a flirting way. But people, when I
21 was kid, like, you've got great eyes, and it's
22 like I'm just a guy.

1 FEMALE SPEAKER 1: You're my guy.

2 MALE SPEAKER: I am your guy.

3 FEMALE SPEAKER 2: Hey, guys.

4 FEMALE SPEAKER 1: Hello.

5 MALE SPEAKER: Hi, hello.

6 FEMALE SPEAKER 2: My name is
7 Dana. I'll be taking care of you today. If
8 you have any questions about the menu, please
9 let me know.

10 FEMALE SPEAKER 1: I guess I do
11 have a question about the chicken. If you
12 could just tell us a little bit more about it.

13 FEMALE SPEAKER 2: The chicken is
14 a heritage breed, woodland-raised chicken
15 that's been fed a diet of sheep's milk, soy,
16 and hazelnuts.

17 MALE SPEAKER: This is local?

18 FEMALE SPEAKER 2: Yes,
19 absolutely.

20 MALE SPEAKER: I'm going to ask
21 you just one more time: and it's local?

22 FEMALE SPEAKER 2: It is.

1 FEMALE SPEAKER 1: Is that USDA
2 organic or Oregon organic or Portland organic?

3 FEMALE SPEAKER 2: It's just all
4 across the board organic.

5 MALE SPEAKER: Hazelnuts? Those
6 are local?

7 FEMALE SPEAKER 1: How big is the
8 area where the chickens are able to roam free?

9 MALE SPEAKER: I'm sorry to
10 interrupt. I have exactly the same question.

11 FEMALE SPEAKER 2: Four acres.
12 Give me just a second. I'll be right back,
13 okay?

14 FEMALE SPEAKER 2: Okay.

15 FEMALE SPEAKER 1: We're doing the
16 right thing.

17 MALE SPEAKER: I'm too apologetic.

18 FEMALE SPEAKER 1: You are.

19 MALE SPEAKER: I drove way too
20 slow here today, didn't I?

21 FEMALE SPEAKER 1: No.

22 MALE SPEAKER: I am so weird at

1 the gas pedal. The thing that just moves the
2 whole vehicle forward and I --

3 FEMALE SPEAKER 2: All right. So
4 here is the chicken you'll be enjoying
5 tonight.

6 MALE SPEAKER: This is fantastic.

7 FEMALE SPEAKER 2: Absolutely.
8 His name was Collin. Here are his papers,
9 okay?

10 MALE SPEAKER: This is great. He
11 looks like a happy little guy who runs around.
12 A lot of friends, other chickens as friends,
13 putting his little wing around another one,
14 kind of, like, palling around?

15 FEMALE SPEAKER 2: I don't know
16 that I can speak to that level of intimate
17 knowledge about him. They do a lot to make
18 sure that their chickens are very happy.

19 FEMALE SPEAKER 1: When you say
20 "they," I mean, who are these people raising
21 Collin?

22 FEMALE SPEAKER 2: It's a farm

1 that's located about 30 miles south of
2 Portland.

3 MALE SPEAKER: And, and, and, and,
4 and, and you feel like you have a good
5 relationship with this farm?

6 FEMALE SPEAKER 2: We do.

7 MALE SPEAKER: But it's not some
8 guy on a yacht who lives in Miami and --

9 FEMALE SPEAKER 2: Oh, goodness,
10 no.

11 MALE SPEAKER: - who's just saying
12 that he's organic?

13 FEMALE SPEAKER 1: It just tears
14 at the core of my being the idea of someone
15 just cashing in on a trend, like organic.

16 FEMALE SPEAKER 2: No. I know the
17 type. No.

18 MALE SPEAKER: I'll tell you what.
19 We're going to go check it out, if you don't
20 mind, just if you could just hold our seats.
21 Yes, we'll be right back. We just want to
22 make sure.

1 FEMALE SPEAKER 1: Thank you so
2 much Dana.

3 FEMALE SPEAKER 2: Sure, sure.
4 (Whereupon, the video presentation
5 was ended.)

6 MR. MCEVOY: Okay. Welcome to
7 Portland. Okay. So as usual, there's a lot
8 to talk about, and the theme of this is Sound
9 and Sensible, but I'm going to give an update
10 on a number of things going on at the USDA
11 National Organic Program in response to some
12 of the things that we've been doing to
13 implement the National Organic Standards Board
14 recommendations.

15 First of all, I'd like to start
16 with why organic, why are we all here?
17 There's lots of important reasons to support
18 organic agriculture: environmentally-sound
19 farming systems, biodiversity, less toxic
20 inputs. I was in the orchards yesterday and
21 remembering when I was young and would pick
22 fruit in the fall in the orchards. At that

1 point, with a young family, there were, I
2 think, two organic orchards in Washington
3 state. And so, of course, we weren't working
4 on the organic ones. We were working on the
5 conventional ones, and they would spray
6 things. And at that young age, I didn't know
7 what the hell they were spraying, but it
8 certainly made me very uncomfortable, having
9 two young children in the orchard. And the
10 growth in organic agriculture has just been
11 great to reduce the amount of toxic pesticides
12 that have been used on so many acres around
13 the country, especially in apple production.
14 So it's really a testament to the good work of
15 the organic agriculture community.

16 Animal welfare, another really
17 important concept in organics that's part of
18 the standards. And then the economic
19 development opportunities, the rural
20 development. There's 500,000 jobs in organic
21 agriculture in the U.S. and more and more
22 every year, lots of opportunity for young and

1 beginning farmers to get into organic
2 agriculture.

3 Next, why is certification
4 important? So this is the keystone of the
5 whole process, to make sure that those organic
6 claims are verified. Certification allows the
7 use of the USDA organic seal in that organic
8 claim. It empowers those consumers to choose
9 between production methods. So by identifying
10 organic, they can, by the label, they can
11 choose the production methods that they
12 support. It's also a gateway to various USDA
13 services in terms of crop insurance and EQIP
14 funding. It verifies that products meet
15 national organic standards; protects consumers
16 to make sure that when they buy organic they
17 are getting organically-produced and processed
18 products, no matter if it's grown locally or
19 coming in from overseas; and it establishes a
20 level playing field for farmers, processors,
21 and marketers so that they have a fair
22 competition.

1 So there's been ten years, a
2 little over ten years of USDA Organic Program.
3 We currently have 85 accredited certifying
4 agents, 25,000 certified operations across 133
5 countries, so it's a global program, lots of
6 farmers involved, not just in the U.S. but
7 across the globe, to supply products in the
8 organic arena. It's a lot of work for the
9 certifiers and the accreditation agencies and
10 everyone to oversee since it has that global
11 scope. Thirty-one billion dollars in U.S.
12 organic sales in 2011, and tens of thousands
13 of inspections, reviews, and certification
14 decisions that are made every year, so lots of
15 judgments, lots of determinations are made by
16 certifying agents on the farms, on the
17 processors, on the whole process.

18 Just a little bit about the NOP
19 budget. For fiscal year 2013, we have a 5.1
20 percent reduction from fiscal year '12. So
21 everybody in D.C. and the federal government
22 is undergoing some very difficult budget

1 times, so that is difficult for us, as well.
2 We have about one NOP staff person to oversee
3 about \$1 billion in sales, so it's a pretty
4 good return on investment. But it's a lot to
5 do with a very small staff.

6 With the non-passage of the farm
7 bill, there's no national organic
8 certification cost share program for this
9 year. That's kind of a bummer. We have
10 strained resources. And what our question is
11 at the National Organic Program is how do we
12 maintain and support a sustainable program and
13 staff? In the whole spirit of organic
14 agriculture, we also have to take care of the
15 people that are involved in doing the work.
16 And I have an amazing staff that make me look
17 good that do a lot of work on behalf of
18 organic agriculture, but they have an
19 incredible workload. They work very long
20 hours and you've really got to be careful to
21 take care of them, to retain them, and stay
22 away from burnout and have realistic

1 expectations of what we can accomplish.

2 All right. On to National Organic
3 Standards Boards, some feedback or progress
4 reports on implementation of our
5 recommendations and some other matters. First
6 of all, on nanotechnology, in October 2010,
7 the NOSB recommended, made a recommendation on
8 engineered nano materials. We responded to
9 the NOSB that we understand that the NOSB
10 considers that nano materials to be synthetic
11 and that they're prohibited under the organic
12 regulations. In December 2010, we responded
13 to the recommendation and said that it would
14 be difficult to identify and verify the
15 absence of nano materials in organic products
16 and that NOP needed more information about how
17 nano materials are defined, regulated, and
18 used in agricultural products.

19 So we have been involved in a
20 number of efforts to respond to the
21 recommendations. Some of the things that
22 we've done based on this recommendation, in

1 April of 2011 we began participating in the
2 White House Emerging Technologies Interagency
3 Policy Coordination Committee. That's quite
4 an acronym there, ETIPC. That reviews
5 policies and provides to other agencies, like
6 FDA and EPA, on nanotechnology issues as they
7 relate to organic regulations.

8 In November, we briefed these
9 representatives that serve on the ETIPC on the
10 NOSB recommendation on nano materials, and we
11 requested information from them, including any
12 definitions that are currently being used that
13 we could synthesize to inform the Board on the
14 activities on nano materials and
15 nanotechnology at the federal level. We're
16 currently synthesizing that information and
17 will be providing an overview, a summary of
18 that, to the Board later this year.

19 Conflict of interest that Mac
20 mentioned. Just recently, on March 29th, we
21 sent a memo to the Board on conflict of
22 interest guidelines memo. It addresses how to

1 recognize and report conflicts of interest.
2 It reaffirms that NOSB members are
3 representatives, that they're appointed to
4 speak for the interest of a particular group.
5 So that's the whole way that the Board has
6 been set up is to have representatives that
7 have interests. You're supposed to have
8 interests, and you're supposed to
9 representative those interests as you work on
10 the Board.

11 The memo provides guidelines and
12 examples of standards of conduct and
13 procedures for assessing and declaring
14 conflicts. In terms of standards of conflict,
15 it outlines some of the various expectations
16 that the Board members don't accept improper
17 gifts, that you don't use your Board
18 appointments for private gain, that you use
19 government property and time properly, that
20 you don't engage in partisan political
21 activities while you're engaged in Board
22 activities.

1 In terms of acceptable interests
2 versus conflicts of interest, you have
3 interests, there are acceptable interests. An
4 interest of a Board member that's acceptable
5 is one that is done on behalf of a represented
6 group and the member receives no
7 disproportionate benefit. That's the real key
8 here is this concept of disproportionate
9 benefit.

10 A conflict of interest is where a
11 member of the Board would have an interest
12 that directly and disproportionately benefits
13 the member, could impair the objectivity in
14 representing the group's interests, or could
15 create an unfair competitive advantage. So
16 the memo goes into some detail on that.

17 The procedure on conflict of
18 interest is NOSB members identify interests on
19 the various proposals that they're working on.
20 Those interests that directly and
21 disproportionately benefit a member lead to
22 recusal from voting on that proposal at the

1 meeting. The recusals will be announced at
2 the meeting at each subcommittee session, so
3 this will be covered during the course of the
4 meeting at the beginning of each subcommittee
5 session.

6 And in terms of just an overview
7 of the interests that have been represented to
8 the program, there's no expectation for any
9 recusals on the current proposals that are in
10 front of the Board for this meeting. They
11 have interests but no disproportionate
12 interests, and they are expected to represent
13 their interest groups.

14 The Board also has a public
15 communications proposal that would establish
16 a year-round public communication tool so the
17 public can submit comments to the NOSB and the
18 NOP at any time of the year. The NOP supports
19 this proposal as a tool for encouraging
20 openness and transparency. If the proposal
21 passes, we will identify an appropriate tool
22 and develop an implementation plan to launch

1 it. And would plan and launch that public
2 communications mechanism closely. We will
3 coordinate closely with the Board if you pass
4 that proposal.

5 Moving on to aquaculture. We have
6 a team that's working on developing a proposed
7 rule on aquaculture. It's under development.
8 They are currently working on the explanatory
9 text, how we are addressing the NOSB
10 recommendation, the intent of the regulation,
11 how it will be implemented and enforced, and
12 it's a complicated process. So it's still
13 going to take a while before we have a
14 proposed rule that's published. First, we
15 have to finish the work, and then it has to go
16 through clearance. And because of the many
17 agencies that are involved in aquaculture, the
18 interagency clearance could take some time.
19 We are hoping to have a proposed aquaculture
20 rule out by the end of the year, but you know
21 how things go. Sometimes it takes longer than
22 we think.

1 There's been a lot of new guidance
2 and policies that have come out over the last
3 six months. We have a new guidance on the use
4 of kelp in organic livestock feed. Kelp is on
5 205.606. It's identified as an agricultural
6 ingredient that must be organic, unless it's
7 not available in organic form. And so the new
8 guidance says that kelp in livestock feed must
9 be certified organic after March 4th, 2014.

10 We have new guidance on seeds,
11 annual seedlings and planting stock in organic
12 crop production. This is partially
13 implementing NOSB recommendations on organic
14 seeds and commercial availability of organic
15 seeds. It describes equivalent variety and
16 commercial availability requirements, and it
17 outlines substances and types of treatments
18 that are allowed and what needs to be verified
19 by the certifying agent.

20 We also have new guidance on
21 evaluating allowed ingredients in sources of
22 vitamins and minerals in livestock feed. It

1 clarifies the permitted ingredients in
2 livestock feed, addresses how to review feed
3 supplements and additives for compliance.

4 We have a new policy memo on cell
5 fusion techniques that are used in seed
6 production. It clarifies which techniques
7 used in seed fusion are considered an excluded
8 method and prohibited, and that policy memo is
9 consistent with the view of cell fusion in
10 organic agriculture that Canada, the European
11 commission, and Codex have, as well.

12 We have just recently published
13 draft guidance for comment, so this is open
14 for public comment, both on classification
15 materials and materials for organic crop
16 production. These are, especially the
17 classification materials, is an NOSB series of
18 recommendations that we're now putting into
19 guidance. That's in three parts. There's the
20 draft guidance on classification of materials
21 itself and then two decision trees, one
22 synthetic/non-synthetic and one

1 agricultural/non-agricultural decision tree.
2 So we look forward to all the public's
3 comments on the classification of materials.

4 We also have draft guidance
5 published on materials for organic crop
6 production, which has an overview of materials
7 for organic crop production that are allowed
8 and then prohibited materials. This is,
9 basically, analogous to the OMRI generic
10 materials list, and we'll be working on
11 additional materials for organic livestock
12 production in the future.

13 Comments are due by June 3rd. And
14 this particular draft guidance is addressed
15 for NOSB recommendations on classification.

16 We also have new instructions on
17 responding to results from pesticide residue
18 testing. In January, we provided initial
19 overview of this at the annual certifier
20 training, and we published this new
21 instruction on March 4th. The goal is to
22 ensure certifiers interpret and respond to

1 pesticide residue testing results in a
2 consistent manner and facilitate compliance
3 with the new residue testing rule that was
4 effective on January 1st.

5 We also have a report that was
6 just issued on biotech test methods. Last
7 year, the OIG recommended that NOP conduct a
8 study of testing methods that may be used to
9 detect the presence of genetically-modified
10 materials in organic livestock feed. So this
11 report summarizes the current guidance that is
12 available to certifiers and producers
13 regarding the sampling and testing for GM
14 material. It describes testing methods that
15 are currently used to test organic livestock
16 feed products for the presence of GM, and it
17 discusses sampling methods that can be used to
18 back up that testing technology. So this is
19 a very good resource for certifiers to use if
20 they're doing GM testing as part of their
21 residue testing program.

22 We also have a new report on a

1 modernized organic database. We currently
2 post a searchable list of certified organic
3 operations once a year. A more modernized
4 system is needed to provide up-to-date
5 information about certified organic operations
6 across the supply chain. This would help for
7 a lot of different reasons, for better access
8 to information, better marketing information,
9 but also for compliance and enforcement to
10 understand who's doing what.

11 The needs assessment and business
12 requirements analysis report describes the
13 primary needs that would guide the technology
14 design and development efforts for a
15 modernized certified organic operations
16 database. So it really outlines the specifics
17 of what we need in this modernized database.
18 It's a great report. The only problem is that
19 we can't move on this particular project
20 unless we get funding for doing this work. It
21 would cost money that we do not have. But
22 there's great information there.

1 Just wanted to briefly go over our
2 request for the NOSB to review other
3 ingredients. We requested that the NOSB
4 clarify what other ingredients are allowed in
5 non-agricultural substances that are listed
6 under 205.605.

7 The NOSB, in our memo to the
8 Board, the NOSB needs to develop a
9 comprehensive recommendation on other
10 ingredients in 205.605 substances. This is
11 what we requested the Board to do in November
12 2011.

13 In the meantime, the NOSB should
14 include references to other ingredients in the
15 background on their recommendations. Any
16 recommended restrictions should be part of the
17 recommended annotation.

18 And then clarification from the
19 NOSB regarding the allowance or restriction of
20 other ingredients will provide consistency to
21 the organic trade, consumers, and certifiers,
22 as the NOP codifies these recommendations into

1 regulations. So we really appreciate the work
2 that's done on other ingredients and look
3 forward to the discussions on that particular
4 topic, as we work towards clarifying what
5 other ingredients, ancillary substances, are
6 allowed in processed organic food products
7 under 605 and 606.

8 We are going to formalize a memo
9 to the Board on the National List petition
10 guidelines and procedures. The current
11 petition process was finalized in 2007. It
12 was a Federal Register notice. And then
13 there's also the petition process that's in
14 the National Organics Standards Board Policy
15 and Procedures Manual.

16 What we're requesting the Board to
17 do is to look at the annotation changes and
18 removals and to revise that to ensure that
19 there's sufficient information is provided,
20 that the petition process in the Policies and
21 Procedures Manual is updated to reflect
22 current practices, because it's not currently

1 aligned with current practices. We're
2 requesting that the petition process should be
3 revised so that confidential business
4 information is not accepted as part of the
5 petition and that the petition process should
6 be updated to ensure timely technical report
7 requests and approval of those technical
8 reports.

9 So we've sent this information to
10 the Board. We'll be following it up with an
11 official memo that will go on to the
12 correspondence page on the NOP website in the
13 near future.

14 Just a little update on the
15 Organic Literacy Initiative, which was
16 launched in September of 2012. This was the
17 initiative to connect organic producers and
18 handlers with USDA programs. There's a lot of
19 USDA programs that support organic
20 agriculture. The NOP is just one of many. We
21 have an organic 101 and 201 training module to
22 explain the basics of organics. And as of

1 March 2013, over 10,000 USDA employees have
2 completed the training. So this is a really
3 great outreach tool that we've implemented,
4 really trying to get field offices around the
5 country to better understand organic
6 agriculture so that they can support the
7 continued success and growth of organic
8 agriculture.

9 Okay. So a lot of things, we've
10 gotten a lot of things done, and we have a few
11 more things that we have to do. So in terms
12 of focus areas for the somewhat near future,
13 National List rulemaking. We have Sunset
14 2013. We'll have a proposed and final rule
15 out very shortly. We have a sodium nitrate
16 proposed rule that will be out this year.
17 That's past due, as you all know. The sodium
18 nitrate sunsetted or expired in October of
19 last year, and so we're behind on that
20 particular rulemaking docket. We have a new
21 listings proposed rule that will be coming out
22 shortly.

1 In terms of practice standards,
2 we're working on origin of livestock, pet
3 food, aquaculture, and apiculture. And
4 Melissa assures me that all four of these will
5 be out later this year. No, but we've
6 actually made a lot of progress on all four of
7 these practices standards, and there's a good
8 chance that they could be out later this year.
9 Yes. And she says, "I think so." At least
10 some of them is what she said. Okay.

11 Other focus areas: guidance
12 documents; grower groups; inspector
13 qualifications; handling unpackaged organic
14 products which is an NOSB recommendation that
15 we're working on implementing; biodiversity;
16 and materials for organic livestock
17 production. Other focus areas are continuing
18 to verify international trade partnerships;
19 increasing international market access, in
20 particular we're looking at an equivalency
21 arrangement with Japan; and reducing the
22 certification burden on diversified direct

1 marketing operations, which I'm going to talk
2 about with the Sound and Sensible part.

3 So let's just move right into
4 Sound and Sensible: How to Maintain Organic
5 Integrity in a Sound and Sensible manner. So
6 we've been working on this now since, really
7 I think the real starting point was when
8 Bonnie from MOSA was the last speaker at the
9 Providence NOSB meeting, and she's retiring
10 from certification work, going back to being
11 an organic farmer, and just is overwhelmed by
12 the paperwork that she has to fill out to
13 maintain her certification. So it was a very
14 compelling argument that maybe we need to re-
15 look at this whole certification process to
16 make sure that we're focusing on the right
17 parts, verifying organic production but doing
18 it in a way that's not overly burdensome to
19 operators.

20 So the current landscape. We have
21 ten years of implementation of the National
22 Organic Program. We've really created a very

1 complex regulatory scheme. It's a very strict
2 process-based oversight from farm to market.
3 Lots of different elements are components and
4 can make it very complicated and burdensome to
5 operators to comply with.

6 Some of the issues. An
7 inconsistent certification process. We noted
8 this during our accreditation audits. That's
9 gotten better over the last few years, but
10 there's still not complete consistency between
11 certifiers. Maybe some of that is good.
12 There's a focus on record keeping and a
13 corresponding burden. The expense of
14 certification. That's not just the direct
15 expenses of the fees, but it's also the time
16 involved in maintaining the records and being
17 inspected. And we also know that there are
18 many farms that comply with the organic
19 standards, but they avoid certification for
20 various reasons. They don't need it for their
21 marketing purposes. They try to do work-
22 arounds. But there are many farms that comply

1 with the basic requirements but avoid getting
2 certified.

3 So what we're trying to do is move
4 it to a more sound and sensible process. So
5 we have this little chart here where we're
6 trying to stay out of the red. We kind of
7 describe our current state as the blue in the
8 upper left where we have a good process, but
9 it's a bit burdensome and paperwork-intensive.
10 It addresses all the factors involved in
11 organic integrity, but it really needs some
12 streamlining. But what we want to do is avoid
13 going into the red. We don't want to
14 streamline the process and lose integrity, so
15 we're looking to move to the right, to the
16 green, an efficient certification process that
17 focuses on the key elements to preserve
18 organic integrity. Okay. It sounds good.

19 So the goal is to make organic
20 certification affordable, accessible, and
21 attainable for all operations. What we mean
22 by affordable is reasonable fees for all sizes

1 of operations and reasonable compliance costs
2 because it's not the direct costs, it's the
3 other costs, as well. Accessible to
4 certifiers and technical assistants so that
5 those things are available locally. In some
6 areas of the country, there's great resources
7 available. In other parts of the country, not
8 so much. And then attainable so that
9 operators can understand what the standards
10 are. If they understand it, they're more
11 likely to be able to comply. Using plain
12 language with reasonable record-keeping
13 requirements.

14 So we have some current
15 initiatives that we have been working with.
16 We have a business process survey working with
17 Vela Environmental, that they're looking at
18 some of the key certification barriers for
19 small businesses and identifying ways to
20 reduce the paperwork burden. The NOSB is
21 working on this with their Continuous
22 Improvement Initiative, how to certify the

1 process rather than the paperwork. There's
2 been good discussion from the certifiers
3 group. And then we've got many different
4 ideas from certifying agents to help us work
5 towards a more sound and sensible process.

6 We've come up with sound and
7 sensible principles. We'd like the Board to
8 take a look at these sound and sensible
9 principles and look to see is this a way that
10 we should move forward on certification and
11 the whole organic certification process.

12 So those principles include five
13 things: efficient processes, eliminating the
14 bureaucratic processes that do not contribute
15 to organic integrity. We want to keep those
16 processes that do lead to organic integrity
17 but eliminate those bureaucratic processes
18 that do not contribute to integrity.
19 Streamlining the record-keeping to ensure that
20 records support organic integrity and are not
21 a barrier to farms and businesses to
22 maintaining compliance. We don't want to make

1 it so complex that people can't comply.
2 Having practical plans that support simple
3 organic system plans that capture organic
4 practices. Fair and focused enforcement.
5 Focus our enforcement efforts on willful
6 egregious violations and handle minor
7 violations in a way that leads to compliance.
8 Publicize how enforcement protects the organic
9 market. And then integrity first, so maybe
10 that should be number one, but focusing on
11 factors that impact organic integrity the
12 most, building consumer confidence that
13 organic products meet defined standards from
14 farm to market.

15 So those are the principles that
16 we've been working with at the program level,
17 and it really has changed the way that we make
18 decisions on enforcement cases and in our
19 accreditation process.

20 So one of the things that we've
21 done so far is, on the penalty matrix, we got
22 a lot of feedback from certifiers about the

1 penalty matrix. We took another look at the
2 penalty matrix, and we saw that it was really
3 record-keeping focused. We published it last
4 September to provide guidance to certifiers on
5 penalties for various types of violations. It
6 was done in the spirit of progressive
7 corrective action, but it does overly focus on
8 paperwork.

9 So in the spirit of sound and
10 sensible, we are reworking or revising the
11 penalty matrix. And we have archived the
12 penalty matrix, taken it off of the active
13 list, and will update that penalty matrix in
14 the future when we finish the revisions.

15 The second thing that we're doing
16 is retraining our auditors. The auditors are
17 the ones that go out and audit the certifying
18 agents to determine that they're meeting the
19 accreditation and certification criteria.
20 We've noted that there's some variability in
21 terms of how auditors have done the audits
22 over the last few years. So we have a week

1 long training in early May for all NOP
2 auditors, both the ones that work out of the
3 grading and verification division and the ones
4 that work directly for the National Organic
5 Program.

6 Some of the topics that we'll be
7 covering are organic system plans, updates,
8 and notification; what is an adequate record;
9 how can certifiers and inspectors provide
10 technical assistance; five steps to
11 certification; what are the requirements
12 around organic certificates; and grower
13 groups; as well as many other topics.

14 We're also working on some new and
15 revised instructions. We have new
16 instructions on technical assistance that was
17 just published yesterday. We're working on a
18 new instruction for organic system plans,
19 organic system plan updates and notifications,
20 and then also on performance evaluations and
21 program reviews. And then revisions to the
22 penalty matrix, five steps to certification,

1 organic certificates, and records. So lots of
2 things going on in this realm of accreditation
3 and certification and more resources for
4 certifiers.

5 In terms of the technical
6 assistance, in 205.501(a)(8), it requires
7 certifiers to provide sufficient information
8 to operations to enable them to comply with
9 the regulations. So certifiers are compelled
10 by the regulations to provide information to
11 farmers, producers, and handlers about the
12 regulations. They're supposed to answer
13 questions, provide help, basically, to the
14 operation so that they can comply.

15 On the other hand, 501(a)(11)(4)
16 prohibits inspectors from consulting. So what
17 we did in this technical assistance
18 instruction is try to make that distinction.
19 Yes, you have to provide information, you have
20 to educate the operations, you have to answer
21 questions. But you can't provide them with
22 specific advice to overcome barriers to

1 certification.

2 So we clarify that in the
3 technical instruction. We'll be deepening
4 that understanding of that instruction with
5 webinars in the future. The instruction does
6 provide some examples.

7 So this tries to make the
8 distinction that technical assistance is broad
9 in general information, educational in form,
10 and it's available to everyone, including the
11 general public, whereas consulting is specific
12 advice directed to an individual operation and
13 not publically available. So technical
14 assistance is allowed and encouraged.
15 Consulting is not allowed by a certifier or an
16 inspector.

17 We also are working on new
18 instructions on organic system plans, organic
19 system plan updates, and notification. We are
20 distinguishing between organic system plan
21 updates and notifications. So an organic
22 system plan is something that an organic

1 operator, producer, and handler needs to have
2 to get their certification started. On an
3 annual basis, once a year, they need to update
4 that plan to keep it current.

5 And then they're also required to
6 notify the certifier for specific situations
7 but only for specific information. In the
8 case of pesticide drift, they have to
9 immediately notify the certifier. For the
10 application of a prohibited substance, they
11 have to immediately notify the certifier. And
12 then there's this other part that says any
13 change that would affect compliance.

14 And so in this new instruction,
15 what we will do is to go into more detail of
16 what are those types of changes that would
17 affect compliance that require immediate
18 notification versus those things that don't
19 require immediate notification that you just
20 update at your next annual update and trying
21 to reduce that burden on the certified
22 operation. So only things that are really

1 important need to be notified.

2 Okay. So, overall, the key
3 message is to certifiers or that certifying
4 agents must ensure organic integrity while
5 setting sensible limits on paperwork. They
6 need to obtain enough information to verify
7 compliance but to minimize the amount of
8 documentation required for certification. So
9 it's that balancing act of doing enough but
10 not too much.

11 But they still, we still want to
12 reemphasize that they have to do enough. I
13 mean, one of the things that we find during
14 accreditation audits is that some certifiers
15 are not doing enough and they need to up their
16 game a little bit. So it's not just that they
17 have to reduce the record-keeping
18 requirements. They have to meet that sound
19 principle to start with.

20 So, in summary, sound and
21 sensible, we say that certification should be
22 sound, verifying and enforcing compliance, and

1 taking action on non-compliances. Certifiers
2 must take action on non-compliances when there
3 are things that need to be improved that are
4 violations. Those things need to be
5 addressed. But it also needs to be done in a
6 sensible way, reasonable records that verify
7 compliance and educating clients on what the
8 requirements are.

9 And then also, in this whole
10 concept of sound and sensible, we're
11 recommending to the Board that NOSB
12 recommendations should embrace this concept,
13 that your recommendations should be sound,
14 maintaining and upholding organic principles
15 of biodiversity, continuous improvement,
16 biological pest management, soil building, all
17 those various principles of organic. But they
18 also should be sensible, really reasonable for
19 producers and handlers so that they can
20 actually be successful in organic agriculture
21 and the recommendations that you make are not
22 overly burdensome on the organic operators.

1 No undue burdens on small businesses. That's
2 something that we, as a program, always have
3 to do in our rulemaking is make sure that we
4 don't have any undue burdens on small
5 businesses. So really think about that as
6 you're working on your recommendations and
7 that they're implementable -- I think that's
8 a word, implementable -- and enforceable so
9 that we can actually enforce the
10 recommendations that you put forward.

11 Okay. So thank you very much, and
12 any questions or comments?

13 CHAIRPERSON STONE: Any questions
14 for Miles? Zea?

15 (Off mic comments.)

16 MR. MCEVOY: Yes, it's on our
17 website. We can send you the link.

18 MEMBER SONNABEND: And what?

19 MR. MCEVOY: We can send you the
20 link for that.

21 CHAIRPERSON STONE: All right.
22 Any other questions for Miles? Thank you,

1 Miles. And on behalf of my brothers and
2 sisters in the certification world, I think,
3 often, people do not appreciate how diligent
4 and how much effort individual staff people at
5 the certification agencies do to verify the
6 integrity of all of their clients. And this
7 Sound and Sensible is a way for them to be
8 more relaxed and helpful in maintaining that
9 without, with maintaining the regulation but
10 also in a way that is very user friendly and
11 welcoming. So we appreciate all the work the
12 Program has put into working through the
13 accreditation of them and helping them become
14 comfortable with a more sound and sensible
15 process. So thank you very much.

16 Okay. We're going to jump right
17 into the public comment period. Michelle,
18 again, we have the -- I see the green light.
19 She has to restart it, the timing. There will
20 be the on-deck circle, which will be kind of
21 over Michelle's right shoulder there.

22 So first up we have Mr. Will

1 Fantle, and Don Finley is on deck.

2 MR. FANTLE: All right. My name
3 is Will Fantle. I'm the co-director of the
4 Cornucopia Institute. I've got some sad news.
5 We're now experiencing a net loss of organic
6 farmers in this country in certain parts of
7 this great nation of ours. The Rocky Mountain
8 states, the Midwest, USDA numbers indicated a
9 decline in organic farmers last year.

10 Ethical organic producers,
11 generally family farmers, cannot compete with
12 massive imports of dubious pedigree from
13 China, India, and former Soviet Bloc
14 countries. Ethical farmers can't compete with
15 large-scale fraud and factory farms with
16 upwards of 10,000 cows or a million laying
17 hens. This is why consumers, in part, have
18 switched to organics for, to try to avoid
19 these types of things.

20 Cornucopia continues to be
21 concerned with improprieties in the execution
22 of the Organic Foods Production Act of 1990,

1 known as OFPA. For example, identities of
2 authors in technical reviews are being kept
3 secret, contrary to the rule in credible
4 scientific publications. In a recent crop of
5 TRs, still our staff was able to identify one
6 scientist who authored the TR, and I wish I
7 was making this up, and also wrote the
8 petition for the corporation involved.

9 Pretending to enforce conflict of
10 interest oversight while letting companies
11 aggressively lobby to ed or retain materials
12 on the National List and allowing employees of
13 these very same corporations who sit on this
14 board to vote in favor of the interest of
15 their corporate employers is a betrayal of
16 ethics in this industry. There's no shame in
17 acknowledging a conflict of interest and
18 recusing yourself to preserve the integrity of
19 this process that we're all part of.

20 The NOP needs to go back to -- the
21 next slide, please. The NOP needs to go back
22 to letting the NOSB set its agenda. Here's

1 the law. This is what OFPA says. It's quite
2 clear. The staff director, in other words Mr.
3 McEvoy's position, is codified in law to be
4 appointed by not the Secretary of Agriculture
5 but by the NOSB itself. This should be
6 followed. It's, perhaps, quite likely that
7 Mr. McEvoy would still occupy the position
8 he's in. He's capable and he understands the
9 ins and outs of organics, but the NOSB should
10 be his boss and they should be setting the
11 agenda for this board.

12 Priorities for new materials that
13 industry wants, like aquaculture, might no
14 longer be Board priorities. Instead, the
15 attention of this board might very well be
16 focused on the review of inert ingredients or
17 animal welfare standards for poultry and other
18 livestock.

19 If this was the case, maybe major
20 league accusations of fraud, investigations
21 still languishing since 2010, would be handled
22 on an expeditious basis because the staff

1 director would serve at the pleasure of the
2 NOSB and the activities of the NOP would be
3 directly accountable to this board.

4 Case in point. I want to draw
5 your attention to a complaint that we have
6 filed with a large egg-laying operation in
7 California. Two years ago this was filed.
8 It's still languishing. The poultry operation
9 freely acknowledges that the birds have no
10 access to the outdoors and look at how they're
11 selling their eggs.

12 Two final points. The pre-meeting
13 agenda of the NOSB needs to be public. Don't
14 try to cut days out of the public agenda. And
15 we want to commend, finally, the current NOSB
16 for materially improved oversight of synthetic
17 materials that took place at the last meeting.
18 Thank you.

19 CHAIRPERSON STONE: Thank you,
20 Will. Are there any questions for Will? All
21 right. Thank you. We've received your
22 written comments. They're very well done as

1 well. Thank you very much.

2 Don Finley is on and Cam Wilson on
3 deck. Don? Is Don here? So Cam Wilson is
4 up, I guess. Thank you much. Which puts
5 Steve Walker on deck.

6 MR. WILSON: My name is Cam Wilson
7 from the company Neudorff, and I'm here to
8 talk about inerts. Dear NOSB, we ask for a
9 clear schedule outlining when each inerts
10 group will be reviewed so resources can be
11 properly planned. Small companies like
12 Neudorff work on set budgets each year, as do
13 you. And without enough lead time,
14 petitioning inerts becomes a serious financial
15 burden to us. We are very concerned about
16 these costs. We cannot afford the same cost,
17 like large companies that have recently
18 entered the organic pesticide market. When
19 will this schedule be available?

20 We ask for a clear, simple to
21 understand criteria as to how inerts will be
22 evaluated, allowed, or disallowed. The

1 evaluation should be based on exposure to
2 humans, animals, and the environment, and
3 based on typical usage levels, not the pure
4 substance. Do you agree?

5 If reformulating of our products
6 is required, we need at least three to five
7 years for the development and EPA approval
8 process. We ask for the evaluation to be done
9 by experts in chemical toxicology evaluation,
10 as they have the most experience in this area
11 and whose opinion is currently used by the
12 EPA. Is this the plan?

13 Finally, we'd like the NOSB to
14 consider that the evaluation of the inerts,
15 the petition, and the attendance of meetings
16 will be a financial burden to smaller
17 companies like Neudorff and will ultimately
18 put the destiny of organic farming in the
19 hands of big ag. Is this fair for our company
20 to carry the cost to petition and defend an
21 inert when it can be used by any company for
22 formulating purposes? Please consider

1 subsidizing an evaluation process. Without
2 your support, U.S. organic farmers may be left
3 with fewer ways to control pests, which will
4 put them at an unfair advantage to imported
5 organic food. Thank you. Any questions?

6 CHAIRPERSON STONE: Thank you,
7 Cam. Any questions? Good. Zea?

8 MEMBER SONNABEND: Not a question
9 as much as a comment, and you'll hear our
10 presentation on this, I believe, on Thursday
11 if you'll stay. You will not be required to
12 petition for individual inerts. There will be
13 a Federal Register Notice where you can turn
14 in your inerts to the Department, if they're
15 not already on the published list but it will
16 not be the same requirements as a full
17 petition.

18 MR. WILSON: Okay. Thanks very
19 much, Zea. Anyone else? Okay.

20 CHAIRPERSON STONE: All right.
21 Thank you, Cam.

22 MR. WILSON: Thank you very much.

1 CHAIRPERSON STONE: Steve Walker
2 and Lianna Hoodes on deck.

3 MR. WALKER: Good morning. I'm
4 Steve Walker. I'm here representing MOSA.
5 We're an accredited certifier of about 1,500
6 operations, primarily in the upper Midwest.
7 We've submitted written comments addressing
8 nine meeting agenda items. I'm going to try
9 to give summaries on our thoughts on all of
10 those here, and then I'd like to tie them
11 together with a word.

12 First, the Materials Subcommittee
13 items. MOSA supports the limited scope
14 technical reviews proposal as a sound,
15 sensible, and efficient approach to review
16 work. Checking threshold issues for deal
17 breakers is a wise use of resources.

18 We also suggest that criteria be
19 considered for similar limited scope reviews
20 for petitions for National List Sections 605
21 and 606. That might involve citing other
22 parts of OFPA, Sections 6517.

1 Regarding confidential business
2 information in petitions, MOSA supports
3 recommendation number two that CBI be allowed
4 but with clear stakeholder responsibilities.
5 Also, when the NOSB reviews CBI, any resulting
6 recommendation must be transparent enough so
7 certifiers know how to rule on our subsequent
8 brand name product reviews.

9 We also suggest that any
10 confidentiality agreements have clear
11 parameters and an organized maintenance system
12 to avoid liabilities. And we believe
13 clarification is needed for defining
14 production aids as used in OFPA 6517. Such
15 clarification should give examples of what's
16 covered and what's not covered by the
17 production aids term.

18 In the GMO Ad Hoc Subcommittee
19 discussion documents on GMOs and seed purity
20 and on excluded methods terminology, we find
21 logistical barriers to certifiers' ability to
22 verify non-GMO status. These include a

1 rapidly-changing technological landscape, lack
2 of disclosure regarding methods used, the
3 expertise required to distinguish between
4 excluded methods types and inability to gather
5 information from back in supply chains. It's
6 not currently clear whether it's possible to
7 establish a method for ensuring genetic
8 purity. We think current NOSB research
9 priorities should consider adding exploration
10 of seed GM issues.

11 In the Vaccine Working Group's
12 interim report, we see similar challenges with
13 changing technology, lack of disclosure, and
14 verifying supply chains. Any expectation of
15 verifying vaccines made with excluded methods
16 will need a clear and practical framework of
17 how to determine compliance. Also, even with
18 a stricter rule regarding GM vaccine use,
19 exceptions may be needed for critical vaccines
20 that are only available from GM sources.

21 We don't usually comment on
22 position materials, but we did comment on

1 oxytetracycline. We recommend consideration
2 of grower input and extending the date beyond
3 2016 to allow enough time for the development
4 of equivalent fire blight control
5 alternatives. Most producers agree that this
6 material is against the spirit of organics,
7 and we find its use is rare but still critical
8 in maintaining the economic viability of the
9 U.S. organic tree fruit market.

10 MOSA supports the Handling
11 Subcommittee proposal on other ingredients.
12 We find this to be clear, enforceable, sound,
13 and sensible. Our comments echo those put
14 forth by the Accredited Certifiers
15 Association. The proposal's definition of
16 other ingredients is helpful in framing the
17 discussion. Any NOP instruction or guidance
18 should include a similar clear definition.

19 And, last, we also support the
20 CACS proposal on calculating percentages. It
21 brings clarity to our work and gets into some
22 finer details than have been presented in NOP

1 training materials.

2 Lots of comments here, but I think
3 there's a bow that ties them altogether. The
4 word is balance. It's our perennial
5 challenge. We must balance consumer
6 expectation of a strong standard with
7 practical, sensible, and achievable
8 verification that keeps organic operators in
9 mind.

10 CHAIRPERSON STONE: Very good
11 timing. Appreciate everyone's respect to
12 that. Questions for Steve, a certifier? All
13 right. Thank you very much. I'm sure people
14 will discuss it with you as we move through
15 the week. Thanks, Steve. Lianna Hoodes and
16 Tatiani Molini is on deck.

17 MS. HOODES: Good morning. I'm
18 Lianna Hoodes with the National Organic
19 Coalition. NOC is a national alliance of
20 organizations working to assure that organic
21 integrity is maintained, consumers' confidence
22 is preserved, and that policies are fair,

1 equitable, and encourage diversity of
2 participation and access.

3 Our coalition brings together
4 differing interests that all have a stake in
5 the future of organic: the farmer growing the
6 food in the regulated system, the consumer
7 buying organic because it represents specific
8 values that they want to purchase, the
9 businesses that get those agricultural
10 products to the marketplace, and
11 environmentalists who see organic as the
12 alternative, providing a clean and healthy
13 environment.

14 That push to meet consumer
15 expectations can be both a gift and a curse.
16 Success of this label in the marketplace has
17 helped to bring major gains in moving our food
18 system towards health and sustainability, yet
19 it can be an issue when the expectation of
20 purity and natural meets the reality and
21 practice of farming and the fact that a
22 wholistic systems approach is about process,

1 not about the final product.

2 But we can lay claim to the food
3 system that is constantly working to get
4 health, environment, and sustainability
5 better. It's often your job, as the NOSB, to
6 bridge that divide and bring transparency to
7 the face of the label, hashing out those
8 differences in the larger community, as well
9 as you hold the torch high to the public, both
10 to the organic consumers and those who aren't
11 buying organic. They know what organic is
12 from your statements.

13 So on your agenda, keep up the
14 momentum on reviewing inerts. Removing toxic
15 inerts from organic is exactly why we're about
16 continuous improvement.

17 Tetracycline. NOC remains neutral
18 on the issue of an extension of use, but we
19 have very strong concerns about the discussion
20 in the subcommittee recommendation because it
21 minimizes the concerns about antibiotic use in
22 organic and misses the point that no

1 antibiotic use must be a central tenet of
2 organic production. This has, obviously,
3 struck a nerve throughout the community.
4 There appears to be polarized positions:
5 farmer versus consumer pitched battle.

6 We don't believe there's that much
7 disagreement. Some of the problems from the
8 marketing of organic products that have been
9 fairly specific in their claims that "organic
10 standards prohibit the use of pesticides,
11 antibiotics, and hormones." That's from a
12 label. Consumers have been shocked and
13 disappointed to hear that antibiotics were in
14 their organic. And truth be told, other
15 materials which were supposed to sunset have
16 just not been coming off the National List.
17 So consumers want and need assurances that
18 antibiotics are absolutely coming off.

19 The farmers have an agricultural
20 problem. Until recently, there have been no
21 inputs, other than antibiotics, to combat fire
22 blight in apples and pears. The new tools are

1 just a couple of years away from being usable
2 in all field conditions.

3 The message in the majority
4 recommendation implies that, while antibiotics
5 will eventually be out, the amounts used in
6 organic aren't really that bad.
7 Unfortunately, in the larger science of
8 antibiotics in our food supply and
9 environment, quantity and residues are not the
10 issue. Any use of antibiotics creates some
11 resistance and end use is incompatible with
12 organic. The NOSB recommendation needs to
13 clearly lead the way with that message, lay
14 out an absolute expiration and lay out
15 specific oversight steps in a directed
16 annotation. Also, from the top, from NOP
17 down, how does that oversight work?

18 I'm going to skip to other
19 ingredients. NOSB already has a policy for
20 all ingredients. They must be organic or they
21 must be on the National List, and they must be
22 reviewed using OFPA criteria.

1 Thank you very much for all of
2 your work, and we hope our comments have
3 helped you.

4 CHAIRPERSON STONE: Thank you,
5 Lianna. Appreciate that. Jay?

6 MEMBER FELDMAN: Hey, Lianna.
7 Thank you for your comments. How do you
8 respond to the argument that the program and
9 the NOSB would be overwhelmed if it had to
10 review all the other ingredients?

11 MS. HOODES: That's difficult. I
12 watch you be overwhelmed. I mean, you have a
13 lot on deck. But, first of all, it's the law.
14 And, secondly, I take a little lesson from
15 inerts. Is there a way, with inerts that look
16 like they were huge numbers and it's been
17 widdled down to what? A hundred twenty-five
18 or so. So through some more investigation of
19 other ingredients, are there ways to batch
20 them together in their review and make it more
21 manageable? I just don't see a legal way
22 around not reviewing every ingredient.

1 CHAIRPERSON STONE: Thank you.

2 Yes, we're trying to figure that out, so
3 appreciate your input on that. Yes, Nick?

4 MEMBER MARAVELL: Lianna, what
5 would -- let me give you the topic first. On
6 the issue of tetracycline, you made a
7 statement that you think that there should be
8 some recognition of a hard and fast ending
9 date. How do you see the NOSB expressing a
10 hard and fast ending date?

11 MS. HOODES: There are two pieces
12 of that. Specifically, on tetracycline, you
13 need to have an expiration date, either 2014
14 or some other. It needs to be firm. Can you
15 guarantee there aren't going to be antibiotics
16 from whatever that point forward is? Can you
17 guarantee that there isn't going to be another
18 petition? No. What you can do is make a
19 public statement that's very clear that takes
20 us into the future, that says that antibiotics
21 don't belong in organic because of the
22 principles of health and environment. And

1 that's -- so in addition to your hard and fast
2 end time, you're stating, for organic, for all
3 time, that it just is not a part of organic.
4 It's not a regulatory or a legal statement.
5 It is a principle statement so that, when
6 other boards are faced with a petition, they
7 have really strong absolute guidance. They've
8 heard it from the community and they've heard
9 it from the Board.

10 CHAIRPERSON STONE: Great. Thank
11 you for that. Okay. Tatiani here? Not
12 seeing her. Deborah Gauthier? Gauthier?
13 Deborah? No Deborah. If you get here, we'll
14 work you back in. Genevieve Perry?
15 Genevieve? No. Going once, going twice.
16 Piotr Swider? Piotr? Going, two, three.
17 Denna Miller? These are signed up under the
18 citizen category. Good. We've got some time
19 for questions, I see. James Garcia? And if
20 there's some confusion, we'll work them back
21 in somehow. James Garcia? No? More
22 questions. Michelle Devlaeminck?

1 Michelle noticed that there was
2 some confusion on some sign-ups that, in her
3 email, she had some issues that we thought we
4 had worked through but apparently not so much.
5 Jeanine Marshall? And they signed up for very
6 specific topics here.

7 Carmen Artigus? Let me get
8 further down here. Kyla, Kyla Smith, you're
9 up. So Michelle will work if these people
10 show up. So if you think, if your sign-up
11 time was later in the day, you can readjust
12 your watch and get ready sooner, like 30
13 minutes sooner. Thanks, Kyla.

14 MS. SMITH: Okay. Good morning.
15 My name is Kyla Smith. I'm the certification
16 program director for Pennsylvania Certified
17 Organic. PCO is an NOP-accredited non-profit
18 certifying agency that certifies about 700
19 operations in the Mid-Atlantic region.

20 I'd like to comment on PCO's
21 support of the Crops Subcommittee's
22 recommendation to extend the expiration date

1 of tetracycline to October 21st, 2016 to
2 ensure that enough research and education on
3 alternatives is available to organic apple and
4 pear producers. Most of the apple and pear
5 producers we certify either use this material
6 or have it on hand to use if models indicate
7 a severe infection is probable.

8 Please consider the following
9 points as you deliberate tetracycline.

10 Research has been underway at the request of
11 NOSB and NOP, but proven alternative practices
12 are not yet available for producers in all
13 geographic regions. The Board must consider
14 that even after alternatives are demonstrated
15 to be effective, it will take additional time
16 for producers to be educated on the
17 alternatives and for the alternatives to
18 become commercially available.

19 Researchers and educators will not
20 have time to complete these steps by a 2014
21 expiration date, as supported by the minority
22 position, and will even be a challenge to

1 accomplish by 2016. A more realistic time
2 line to end the use of antibiotics in organic
3 apple and pear production would be 2017, which
4 would allow current research projects and
5 field testing to culminate and for this
6 knowledge to disseminated to producers in
7 order to be implemented in true on-farm
8 situations.

9 The sunset process established in
10 the Organic Foods Production Act seemed to be
11 appropriate in 1990 and has continued to work
12 for more than 20 years. When materials are
13 taken out of this process, especially before
14 there are commercially-viable alternatives for
15 producers, it creates unnecessary burdens on
16 stakeholders across the organic community.

17 PCO supports the resolution
18 presented by the subcommittee that commits the
19 organic community to phase out this material,
20 provided that the step-down is in a gradual
21 fashion and allows operators to transition
22 their production practices to use alternative

1 methods to controlling fire blight. The use
2 of tetracycline as a disease-control material
3 is already controlled by the regulations.
4 Certifiers are ensuring that antibiotics are
5 only used when other methods in the organic
6 system plans are ineffective. We will
7 continue to uphold these regulations while
8 encouraging more alternatives are tested by
9 producers as they become available until the
10 phase-out is fully implemented.

11 I would also like to provide some
12 comments regarding the Handling Subcommittee's
13 recommendation on other ingredients. PCO
14 strongly supports this recommendation. We
15 would like to reiterate the importance for
16 including prohibitions and/or other
17 restrictions on other ingredients in the
18 annotation or have this included in guidance
19 from the NOP, such as what's provided in the
20 recent draft guidance published by the NOP
21 regarding materials for organic crop
22 production. This would allow consistency and

1 efficiency among certifiers, as we would be
2 able to look to the regulations for guidance
3 from the NOP, as opposed to digging through
4 previous TRs and/or NOSB recommendations in
5 order to find these other ingredients.

6 Additionally, we'd like to
7 encourage the other ingredients be annotated
8 categorically. This will also lead to
9 consistency among certifiers and other
10 material review organizations which will see
11 the gamut of these other ingredients in
12 reviewing brand name materials.

13 Lastly, we support the segregation
14 of non-food substances onto their own list.
15 These non-food substances do not make up any
16 part of the composition of the organic food
17 product and, in the case of several of these
18 materials, do not ever come into contact with
19 food. It would be logical to review these
20 materials according to baseline criteria that
21 are relevant to their use.

22 Thank you so much for all of your

1 time and hard work.

2 CHAIRPERSON STONE: Thank you,
3 Kyla. Questions? Yes, Jay?

4 MEMBER FELDMAN: Thank you for
5 your comments. Has PCO evaluated the
6 potential adverse effects of using antibiotics
7 in apple and pear production?

8 MS. SMITH: Meaning?

9 MEMBER FELDMAN: Well, your
10 testimony is about the need. That's what I
11 heard mostly. Have you guys looked at --

12 MS. SMITH: How many producers
13 would leave?

14 MEMBER FELDMAN: Well, the adverse
15 effects on public health possibly of the
16 chemicals used.

17 MS. SMITH: We believe that there
18 is, yes, certainly a public health issue in
19 using antibiotics. We don't believe that it
20 is aligned with organic principles. But we
21 believe that, you know, you can't just, as Liz
22 discussed at the NOC meeting yesterday,

1 somebody is trying to learn how to walk, rip
2 the crutches right out of them before they
3 have, you know, viable alternatives to help
4 them.

5 MEMBER FELDMAN: Even given the
6 history of the NOSB as it attempts to remove
7 the material over the last decade?

8 MS. SMITH: Yes.

9 MEMBER FELDMAN: Thank you.

10 CHAIRPERSON STONE: Nick?

11 MEMBER MARAVELL: Kyla, the PCO,
12 Pennsylvania Certified Organic, certifies a
13 lot of operators in Pennsylvania and the
14 surrounding areas. Do you have any
15 information on, roughly, how many apple and
16 pear growers you have? And then my second
17 question is are you aware of what the current
18 status is of research that would be
19 appropriate to your region of the country with
20 regard to control of fire blight in apple and
21 pear production?

22 MS. SMITH: Sure. We certify only

1 15, so we have a small pony in the race. I
2 don't know how much research has been done.
3 I think most of it has been done in the West
4 Coast. I do know that one grower that we
5 certify is a research test plot at Penn State,
6 but I'm not familiar with the research that
7 they have, you know, done so far on their test
8 plot.

9 CHAIRPERSON STONE: Great. Thank
10 you, Kayla. Oh, Joe, thank you.

11 MEMBER DIXON: Of your 15 apple
12 and pear growers, do you have a sense from
13 that community, if we were to keep the 2014
14 deadline, what would their response be?

15 MS. SMITH: I'd say a third of
16 them have indicated that they would go out
17 automatically. Most have indicated that it
18 would depend on the year and, if it was a bad
19 year, then they would likely decide to go out
20 of organic production because they would want
21 to save their orchard. I have a quote from
22 one of our growers, when asked if he would

1 continue with his organic production, and he
2 said, "Yes, but I may eventually go out of
3 business. Since I only plan to grow certified
4 organic, my trees would probably die. When
5 the correct weather conditions occurred during
6 bloom, the disease would build in the orchard
7 until, eventually, all the trees would be
8 dead."

9 CHAIRPERSON STONE: Thank you,
10 Kyla. You'll be here the rest of the week for
11 comment?

12 MS. SMITH: Yes, sir.

13 CHAIRPERSON STONE: Thank you very
14 much. Okay. Jake, you're up. And let me run
15 through the list that have not signed in. So,
16 Gwendolyn, you might get your notes ready. Is
17 Ineska Antolos here? Virginia Clinton? These
18 next few people didn't sign in that registered
19 that they were here. Debra Sanders? Brian
20 Baker? Very good, Brian. Nancy Parham?
21 Okay. So, Brian, you're up and Gwendolyn
22 after that. I mean, Brian, you're on deck and

1 Gwendolyn after that. Thank you. Jake, thank
2 you.

3 MR. LEWIN: All right. Thank you.
4 My name is Jake Lewin. I'm the chief
5 certification officer for CCOF Certification
6 Services. We certify more than 2,500
7 operations to the NOP standards. That's more
8 than any other certifier in the world. We
9 appreciate the efforts and dedication of the
10 NOSB, particularly the CACS and the NOP, to
11 both develop reasonable policies and also
12 address unnecessary barriers to certification
13 and paperwork issues.

14 We strongly encourage the NOSB to
15 support the NOP's Sound and Sensible
16 Initiative and to integrate its principles and
17 approach in your work. Sound and Sensible can
18 and does apply to NOSB recommendations.
19 Please continually ask yourself if what you're
20 proposing is affordable, accessible, and
21 attainable.

22 Perfect examples of balancing

1 competing needs are both the CACS items on
2 percentage calculations and other ingredients.
3 These are great starts towards reasonable
4 standards that protect organic label while not
5 binding ourselves, certifiers and the Program
6 or operations, in unattainable paperwork
7 hurdles. The percentage calculation document
8 is very reasonable.

9 The most onerous suggestions in
10 the previous other ingredients proposal have
11 been removed. This makes the approach
12 reasonable and achievable at the regulatory
13 practices and certification levels. By
14 comparison, the approach in situation with
15 tetracycline is the opposite.

16 To be clear, we support the
17 elimination of antibiotics in organic
18 production. We support the majority position
19 to extend the expiration date not because it
20 makes sense but because it's the best bad
21 option.

22 A more reasonable deadline that

1 respects the length of time to actually farm
2 apples and develop and register alternatives,
3 particularly in California, is far more
4 appropriate. Specifically, any material, such
5 as Previsto, which achieves EPA registration,
6 will have to go through a long registration
7 process in California. We fear this time line
8 does not support that.

9 At a more fundamental level, we
10 ask the NOSB to respect the sunset process and
11 review materials and appropriate time frames.
12 Constant and irregular expiration dates are
13 disruptive to us as a community and create
14 ongoing conflict.

15 Further, artificial deadlines
16 created without regard to the science or
17 agronomic realities is creating mistrust in
18 the community and apathy among the farm
19 community. We need look no further than the
20 eloquent comments submitted by Jim Koan of
21 Almar Orchards. In it, he expresses the
22 frustration with the Board and the process.

1 We believe that many, if not most, of our
2 growers feel that the process is a political
3 circus that is ignoring them and, therefore,
4 they're not making their voices heard. That
5 is not a recipe for engagement, much less
6 continued organic certification.

7 As a certifier, we depend on
8 strong standards, clear rules, and reasonable
9 processes. The current approach is frequently
10 not delivering this.

11 The NOP's 2013 Certified Entities
12 List just came out and shows that organic
13 operations in the U.S. grew by only about 25
14 operations. The list basically went from
15 17,000 to 17,025. This stagnation is a
16 serious issue and a result we've never seen
17 before. Implementing policies and processes
18 that don't reverse this trend are a real
19 problem, and we would ask you to consider this
20 and to approach these situations in a
21 different manner so that this trend can be
22 reversed. Thank you.

1 CHAIRPERSON STONE: Thank you,
2 Jay. Questions? John?

3 MEMBER FOSTER: So do you feel,
4 back to the sound and sensible thing, do you
5 feel like those kinds of impediments that
6 sound and sensible practices are trying to
7 address, do you feel like that is the main
8 driver of slower numbers, 17,000 to 17,025, or
9 what other factor, what other features are
10 there that are driving that in your
11 certification experience?

12 MR. LEWIN: In our experience,
13 when economics are easy, many barriers can be
14 overcome fairly easily. When economics are
15 tight, when times are hard, additional
16 barriers, additional barriers around cost,
17 around paperwork, around process, around
18 regulatory process become insurmountable far
19 more easily. And from my perspective, a lot
20 of the barriers that were tolerated before
21 become intolerable as the economic situation
22 becomes tougher for operations. Essentially,

1 things we've done in the past don't work as
2 well when things are tighter.

3 CHAIRPERSON STONE: Nick?

4 MEMBER MARAVELL: Yes, Jake. I'm
5 going to pose, essentially, the same question
6 to you that I did to Kayla. What are,
7 roughly, the numbers of apple and pear growers
8 you have in your universe, which is an
9 extensive universe? And if you could comment
10 on where you see the status and the level of
11 research support to provide alternative
12 methods and materials to control fire flight.

13 MR. LEWIN: Well, with regard to
14 the numbers, we certify 142 apple growers, 69
15 pear growers, 25 Asian pear growers,
16 representing about 2,280 acres of pome fruit.
17 So significant number of operations, primarily
18 in western states.

19 With regards to the research, the
20 victory here is that everybody, the community,
21 there's some consensus about removal of these
22 materials and, finally, the research is being

1 done. A tremendous amount of excellent
2 research is being done and research dollars
3 have finally come in. Unfortunately, the time
4 lines for research and commercialization of
5 viable alternatives which may even benefit
6 conventional production simply don't operate
7 on the time lines being proposed by this
8 board.

9 MEMBER MARAVELL: And so what is
10 your suggestion as an appropriate time line,
11 if you can make such a suggestion?

12 MR. LEWIN: At least respect the
13 normal sunset, normal sunset time lines. What
14 I would rather occur is to look at the results
15 of the research and the time lines for
16 commercialization and the Board to make that
17 decision.

18 CHAIRPERSON STONE: Calvin?

19 MEMBER WALKER: Jake, I believe
20 you probably have already answered it, but you
21 mentioned the best of a bad option. And my
22 question was what would you consider a best of

1 a good option, but I think you probably just
2 answered it with Nick.

3 MR. LEWIN: I would rather see a
4 date that you, as a board, can defend based on
5 the evidence, as opposed to a date that's
6 based on some kind of compromise.

7 CHAIRPERSON STONE: Jean?

8 MEMBER RICHARDSON: Jake, as one
9 of the consumer reps, I obviously have an
10 enormous concern that, by allowing the
11 tetracycline or antibiotic applications to go
12 forward, that there will be residues of
13 tetracycline in harvested fruit. So looking
14 at the risks and the benefits of continuing
15 the tetracycline, as opposed to eliminating it
16 right away, based on your work with CCOF, help
17 me to understand the risks and benefits of
18 following the recommendation the way the
19 majority is proposing it.

20 MR. LEWIN: I am not intimately
21 familiar with the data on residues. It's my
22 understanding that these materials are

1 generally applied during bloom, which, from my
2 way of thinking, would not lead to residues
3 typically. Similarly, certifiers have
4 tremendous latitude to do testing and could do
5 such testing if that was a concern. My
6 concern, actually, would be more around the
7 increased use of other materials and residues
8 from other materials on apples as a result of
9 these 2,200 acres going to conventional
10 production.

11 MEMBER RICHARDSON: So let's just
12 assume, if I may, Mr. Chair, so let's assume
13 I'm going to choose between conventional
14 production with all the inputs that go in
15 there and the organic production which
16 includes the antibiotic. Do you have sort of
17 a sense of the risks and benefits to the
18 consumer consuming the inputs from the
19 conventional apples, as opposed to the limited
20 inputs, including tetracycline, to the --

21 MR. LEWIN: As a consumer myself,
22 I would rather purchase the organic apple and

1 I would rather live next door to the organic
2 apple orchard, particularly considering that
3 antibiotics are used in conventional control
4 of fire blight. We're the ones that are going
5 to solve this over time for the industry as a
6 whole.

7 CHAIRPERSON STONE: And Harold to
8 finish this out.

9 MEMBER AUSTIN: Jake, thanks.
10 With the grower base that you guys work with
11 and certify, the antibiotics that are used,
12 the tetracycline specifically, for fire blight
13 control, is this a prophylactic approach in
14 use of application that they're just, carte
15 blanche, using the material or what's the
16 basis that the applications are being used on?
17 I mean, is every acre getting it, or is this
18 based off of the need and conditions?

19 MR. LEWIN: Well, firstly, I've
20 been on very, very few operations that use
21 materials willy nilly. Materials are always
22 costly. They're always the last resort. No,

1 certain commodities are more susceptible.
2 Certain areas are slightly more susceptible.
3 Certain weather patterns create -- to say that
4 we certify 2,200 acres of pome fruit is not to
5 say that 2,200 acres will receive tetracycline
6 applications. Some will during certain
7 conditions at certain times. It's simply not
8 a standard application measure.

9 CHAIRPERSON STONE: Okay. Thanks,
10 Harold. Jake, thank you very much.

11 MR. LEWIN: All right. Thank you
12 very much.

13 CHAIRPERSON STONE: And you'll be
14 here a few days, I'm sure. Brian Baker is up,
15 Gwendolyn on deck, and then Trudy Bialic after
16 Gwendolyn.

17 MR. BAKER: All right. Thank you.
18 I'd like to comment on three areas, wearing
19 maybe three or four different hats. First, I
20 would like to speak on behalf of the
21 International Federation of Organic
22 Agriculture Movements regarding the use of

1 excluded methods and seed purity. Second, I
2 would like to discuss the use of antibiotics
3 in organic production. And, third, I'd like
4 to make a general comment on the materials
5 review process.

6 IFOAM's mission is to lead and
7 unit the organic world. I'm speaking as a
8 standards committee member of IFOAM. IFOAM
9 views genetic engineering and the related
10 technologies as entirely incompatible with
11 organic principles. In response to the
12 February 6th discussion paper, we acknowledged
13 some gray areas, but there is a global
14 consensus emerging on these issues. And the
15 organic community feels there's no place for
16 genetic engineering in organic production and
17 handling.

18 IFOAM proposes that the NOSB and
19 NOP define genetic engineering in a way that's
20 consistent with IFOAM, Codex Alimentarius, the
21 European Union, other recognized international
22 standards. So as we move forward, the USDA

1 organic means the same thing. We're all on
2 the same page around the world.

3 The term "excluded methods" is
4 considered confusing jargon outside of the
5 United States. IFOAM respectfully requests
6 the NOSB recommend that the USDA adopt the
7 plain English term "generic engineering" to
8 describe the technologies make it clear what
9 is prohibited and that that definition should
10 be consistent with Codex, IFOAM, and the EU.

11 What is decided in the U.S. has
12 consequences throughout the world. Consistent
13 with the principle of care, IFOAM has taken a
14 precautionary approach as to the adoption of
15 novel biotechnologies. IFOAM asks the NOSB
16 and USDA do the same. To do otherwise risks
17 the credibility of the USDA organic label,
18 both domestically and in the global market.
19 This holds true for the seed purity issue
20 where sourcing uncontaminated seed in certain
21 crops, particularly cotton, is a global issue.

22 On the tetracycline, this is

1 speaking as an individual really, I was the
2 certifier representative when the petition was
3 submitted back in 1995 and have a long history
4 of this debate. Organic farmers throughout
5 the world, including in the Pacific Northwest
6 and British Columbia in the Northeast and
7 Ontario and Quebec are producing apples and
8 pears without the use of antibiotics in
9 similar climates under similar conditions.
10 The alternatives exist and are being used
11 successfully outside the United States, so as
12 long as the antibiotics are allowed
13 manufacturers of alternatives are in a catch-
14 22. They're not going to ramp up production
15 and capacity to meet the market need unless
16 they're sure the market is there.

17 So when I was on the NOSB an doing
18 technical reviews in the 90s, the assumption
19 was that the sunset process would be more
20 robust and that, as organic continuously
21 improved, substances would come off as easily
22 as they went on. That's not proven to be the

1 case. So as the NOSB should be aware, once
2 you put something on, it's real hard to get it
3 off.

4 Accelerated sunsets have a dubious
5 history, at best. You look at DL-Methionine.
6 That has -- okay.

7 CHAIRPERSON STONE: Good. Thank
8 you, Brian. Questions? Harold?

9 MEMBER AUSTIN: Brian, thanks.
10 You mentioned that, outside of the U.S.,
11 there's other products that are currently
12 being used and registered for use for fire
13 blight control. Could you name what those
14 are?

15 MR. BAKER: Well, there's one,
16 Blossom Protect. It's aureobasidium
17 pullulans. That's being used in Austria and
18 Germany, other parts of the European Union,
19 and showing results comparable to what's being
20 achieved with antibiotics. That's one
21 example, but it's really an integrated
22 approach. There's no one silver bullet. It's

1 sanitation. It's selection of resistant
2 varieties. It's long-term strategy. It's
3 relying on a number of different techniques
4 and not just relying on a single input.

5 CHAIRPERSON STONE: Nick?

6 MEMBER MARAVELL: Yes, Brian. I
7 appreciate your comments. You said that there
8 were apple and pear producers, East Coast,
9 Canada, West Coast, Midwest, that were able to
10 produce organic tree fruit without the use of
11 antibiotics. And then you also have admitted
12 that there are other producers who are,
13 indeed, using the antibiotics in organic
14 production. I'm just wondering if you have
15 enough knowledge or, you know, personal
16 observation to give us what you feel might be
17 some of the characteristics of the farms, or
18 the orchards, rather, that are not using the
19 antibiotic. Do they have a different
20 characteristic than the operations that are
21 using the antibiotic?

22 MR. BAKER: Well, I mean, that's a

1 good question. And the ones that are not
2 using antibiotics more often are outside of
3 the U.S., so they've never had that option to
4 rely upon. A lot of producers don't use
5 antibiotics as a general rule. They could be
6 -- I think it's somewhat scale dependent and
7 that there appears to be more with larger-
8 scale operations, less likely with small-scale
9 operations, less likely with operations where
10 apples and pears are not the main cash crop
11 but it's part of a system where they're
12 marketing more than tree fruit. Just casual
13 observations. I don't have hard statistics to
14 back that up.

15 CHAIRPERSON STONE: John?

16 MEMBER FOSTER: How are those
17 other materials reviewed in the EU, and what's
18 the relationship between the primary reviewer
19 and certifiers who approve them as part of
20 what's analogous, I assume, to an OSP?

21 MR. BAKER: Well, these are
22 considered microorganisms or biological

1 controls. And on the European Union annex has
2 microbiological products similar to, for
3 example, bacillus thuringiensis or Beauveria
4 bassiana. So they fall into that same
5 category.

6 The certification agents and the
7 competent authorities, you know, evaluate
8 against the annex. Of course, the European
9 Union does not follow the same standard for
10 inert ingredients or formulated products that
11 is followed by the USDA organic program. So
12 there's -- yes, those generic products are
13 permitted. The formulated products follow.

14 CHAIRPERSON STONE: Jay?

15 MEMBER FELDMAN: Brian, you talked
16 about incentivizing transition by sort of
17 suggesting that the Board sometimes has to
18 make difficult decisions that seem onerous or
19 potentially adversely affecting economic
20 position of a particular grower group. Are
21 there historical examples that might be
22 similar to this one in which the Board,

1 because of public health reasons or because of
2 consumer concern reasons, sort of gets out in
3 front of where the industry would prefer to
4 go, given its reliance on a particular
5 material or process or practice?

6 MR. BAKER: Well, I mean, that's a
7 good one. As I said before, once substances
8 go on the National List, it's really difficult
9 to take them off. And the precedents, more
10 often, are the case where the NOSB has acted
11 with caution and has not put things on the
12 National List, forcing the producers to
13 develop alternatives. And I think that's been
14 true for, you know, you can go back and comb
15 through, for example, with treated seed and
16 the petitions to allow EBDC fungicides was
17 rejected: thiram, ziram. Organic farmers came
18 up with alternative treatments. The seed
19 industry came up with alternative treatments.
20 There were, of course, seed companies and
21 certain commodities where seed was just
22 difficult to find untreated and it was an

1 extra burden on those farmers. But,
2 eventually, the untreated seed and seed
3 treated with materials permitted by the USDA
4 organic program came to the market.

5 CHAIRPERSON STONE: Nick, if
6 you'll wrap this up.

7 MEMBER MARAVELL: Brian, I don't
8 know if you'll be able to address this, but,
9 in looking at the use of tetracycline, I'm
10 just wondering, in other countries, are there
11 back-up or emergency situations where an
12 organic producer would be permitted to use an
13 antibiotic, perhaps not being able to market
14 the resulting fruit as organic but being able
15 to maintain certification going forward into
16 a future year? Is there any, have you seen
17 any evidence of that type of provision in
18 other countries?

19 MR. BAKER: Not really. I mean,
20 the countries where the fire blight pressure
21 is the heaviest, there really has not been
22 that turning to antibiotics. When there is a

1 bad outbreak, it's more often they'll resort
2 to other bactericides, other fungicides. And,
3 again, the withdrawal from the market is
4 always an option. It's used much less as an
5 option. I think in Europe people tend to stay
6 in the organic certification longer because
7 it's much harder to move land in and out of
8 organic production under European Union
9 regulations, so they take a hit for a bad year
10 and then they come back the next after pruning
11 heavily and trying to get as much of the
12 infection out as possible.

13 CHAIRPERSON STONE: Thank you very
14 much. Gwendolyn, we're going to take a break
15 after Gwendolyn. I wouldn't dare -- she's
16 been pacing back there. I wouldn't take the
17 break now. She's ready to go. So, Board
18 members, we don't want to get spoiled here.
19 We found a little time and, obviously, I want
20 to run with the expertise at the podium.
21 Gwendolyn?

22 MS. WYARD: Great. Hello. My

1 name is Gwendolyn Wyard, and I'm the
2 regulatory director of organic standards and
3 food safety for the Organic Trade Association,
4 representing over 6,000 members across 48
5 states. My comments today will address
6 oxytetracycline and other ingredients. You
7 have our written comments on six other topics,
8 as well as our two-page summary.

9 OTA agrees that antibiotics should
10 be completely phased out of organic
11 production, and we support all efforts to
12 develop effective alternatives. There are two
13 take-home messages we hope were effectively
14 delivered in our written comments. The first
15 is that the organic industry is acutely aware
16 of the concerns surrounding the use of
17 antibiotics, and I think we all agree for the
18 need for an alternative.

19 The crux of the issue is to get
20 from point A, which is now validated field
21 results of new alternative materials, to point
22 B, which is widespread availability and

1 adoption by organic growers. There's too much
2 to lose if we can't adopt alternative
3 practices while retaining organic acreage.

4 Researchers and orchardists have
5 committed years of research into developing
6 alternatives, and efforts have recently
7 accelerated due to significant USDA funding.
8 Excellent progress is being made, and the
9 prospect that we're actually within a three-
10 to five-year time frame of securing a non-
11 antibiotic program is monumental.

12 This brings me to my second take-
13 home message. The 2014 deadline falls short
14 of critical research that will validate newly
15 developed materials. And 2016 will likely cut
16 short the time needed for grower education and
17 experience. Many growers have not tried the
18 new and emerging alternatives and are
19 concerned about the risk of catastrophic
20 disease in the absence of proven alternatives.
21 When faced with a high-risk fire blight
22 situation, growers will be forced to exit

1 organic production. If we truly want to end
2 the use of antibiotics and retain organic
3 acreage, growers must have alternatives and
4 they must be confident that they will work.
5 Otherwise, we'll effectively increase the use
6 of antibiotics, along with the use of other
7 pesticides, because of the loss of organic
8 acreage.

9 OTA supports a hard deadline of
10 2017 because, unlike 2016, it's tied to a
11 fact-based research-supported time frame. Of
12 course, we'll support a 2016 deadline over a
13 2014 deadline. But as a matter of principle,
14 we need to stop creating deadlines as a course
15 of political compromise. They do nothing but
16 set us up to fail.

17 The 2014 extension and now the
18 petition for another extension are not the
19 result of complacency. We were slow to start,
20 but researchers are now working as fast as
21 they can and they're turning out successful
22 results. It would be a travesty to

1 prematurely pull the plug and set back such
2 great progress.

3 I'll conclude by saying that we
4 urge NOSB to give organic apple and pear
5 growers the time needed to trial and to
6 implement the new and emerging materials into
7 their existing preventative control systems.
8 We have to look closely at the implications
9 and understand that we have an incredible
10 opportunity. If we can succeed with the
11 large-scale adoption of a non-antibiotic
12 program in organic orchards, conventional
13 orchards will also adopt these alternative
14 techniques. We're seeing it happen already.
15 From our viewpoint, this is the road to truly
16 ending the use of antibiotics in all of
17 agriculture.

18 A few take-home messages from our
19 written comments on other ingredients.
20 Historically, NOSB has reviewed other
21 ingredients contained within a substance and
22 they have addressed them through the use of

1 annotations. We have not, however, had a
2 clear written policy or documented procedure,
3 and that has led to inconsistency at the NOSB
4 level and perhaps even more so at the ACA and
5 MRO level. Improvements are needed.

6 Therefore, we generally support the Handling
7 Committee's proposal with a few minor
8 revisions, as suggested in our written
9 comments.

10 And, finally, as stated in the
11 proposal, there are about 13 substances on 605
12 and 606 that require the use of other
13 ingredients. We have a great deal to learn,
14 and the review ahead of us will be challenging
15 and complex. But we believe it's manageable;
16 and with this policy and procedure in place,
17 we will take what is already the most rigorous
18 material review program in the world and make
19 it that much better. Thank you.

20 CHAIRPERSON STONE: Thank you,
21 Gwendolyn. You're close, but Steve still has
22 you on the timing of the button there. So

1 we're thinking of a prize for who gets it the
2 closest. You're second right now.

3 MS. WYARD: Can I try again?

4 CHAIRPERSON STONE: Questions for
5 Gwendolyn? John?

6 MEMBER FOSTER: Could you kind of
7 capture quickly what differences you see now
8 versus when the original 2014 deadline was
9 set?

10 MS. WYARD: Sure, yes. I think
11 the big difference between now and 2014 is the
12 progress in the development of alternative
13 materials. If growers have alternative
14 materials, then they will, in fact, use those
15 materials, but we've got to get -- 2014 was
16 not based on the availability of materials.
17 As soon as that 2014 deadline was set, that
18 petition was in, we knew at the time we
19 couldn't meet that deadline because the
20 alternatives were not there. So that did, in
21 fact, you know, it lit a fire, and we've made
22 incredible progress and it's exciting to see

1 what's out there.

2 So I think the big difference is
3 that we really have these tools. They're new.
4 There's one very critical one that hasn't been
5 registered yet. Hopefully, it will be
6 registered this year. But Blossom Protect was
7 just registered by EPA in 2012, so there's a
8 lot of growers out there that I think would be
9 absolutely willing to use these other
10 materials but they need to learn how to use
11 them. They need to be confident that they're
12 going to work. The risk is too great. It's
13 not, they're not going to decide to just risk
14 their orchards without knowing and being
15 confident that these materials work.

16 MEMBER FOSTER: Okay. Thanks.
17 And nice use of lit a fire. That's really
18 good. It's clever.

19 MS. WYARD: Thank you. It was for
20 you, John.

21 CHAIRPERSON STONE: Nick?
22 Gwendolyn, you're still up. Thanks. We've

1 got a couple of questions yet.

2 MEMBER MARAVELL: Gee, Gwen. I'd
3 like to ask two questions. One is you made
4 the statement that effective use of non-
5 antibiotic control of fire blight could spur
6 that practice in the conventional market. And
7 I was just wondering if that's based on
8 something solid? My impression, and I'll just
9 give you my impression, is that things like
10 alternative practices, non-antibiotic
11 practices, may, indeed, end up being more
12 expensive than antibiotic use. So I didn't
13 know if you had any information on that, and
14 then I'll ask my second question.

15 MS. WYARD: I had the opportunity
16 to visit the trial orchards in Corvallis since
17 that's where I'm from. I visited with Ken
18 Johnson and walked the orchards, and he did
19 say that, you know, we're already seeing
20 conventional growers adopting the use of
21 Blossom Protect because antibiotics, that's
22 running them, that's their highest bill right

1 now. And so they're looking for other
2 materials to supplement the use of the
3 antibiotics to get that cost down.

4 You know, when I started looking
5 into this about six months ago, you know,
6 there was no way that OTA would come up to a
7 podium and promote, request an extension for
8 antibiotics unless we were absolutely
9 confident that there was real progress being
10 made. So the experience that I went through
11 in working with Ken Johnson and discussing
12 this with David Granatstein was a really
13 amazing process, and one thing that I went
14 through, and you'll see, I handed around the
15 organic report, it ended up resulting, it
16 inspired a thematic publication that we put
17 together, the cover story being "Organic Tree
18 Fruit: A Success Story," because David told me
19 a couple of stories and, hopefully, David will
20 talk more about this tomorrow, but a couple of
21 specific stories where the adoption of
22 biological controls were adopted by the

1 conventional where we did, in fact, see this
2 progression happen from adoption at the
3 organic front and adoption from the
4 conventional.

5 So we're already seeing it happen
6 with Blossom Protect, I think Provista.
7 You'll hear more about that product tomorrow.
8 The combination of those two together, in
9 addition, of course, to all the other
10 cultural, biological, mechanical practices,
11 you know, I think it's a win/win situation.

12 The costs, I think the costs and,
13 again, the panel, I appreciate that question
14 being asked to them as far as what the direct
15 cost is, but my understanding is that it can
16 be comparable or less, so it would be a no-
17 brainer because of the need, the desire.

18 Change happens at the marketplace. Nobody
19 loves antibiotics. This request that we're
20 seeing here is going to happen across
21 conventional agriculture if we have those
22 materials available. I think that's the key.

1 MEMBER MARAVELL: My second
2 question was you're advocating an extension
3 through 2017. That would be one year beyond
4 the current Committee recommendation. What
5 specifically would you see happening, in your
6 mind, during that additional year?

7 MS. WYARD: Yes, I think that is
8 the critical year for grower outreach. The
9 OREI project will conclude in 2015. Compiling
10 the results of that project, looking at the
11 new materials, using the new model, putting
12 together, basically, a publication with those
13 results, and then also we're looking at
14 funding a grower publication extension
15 document that would go out to all the growers
16 showing them the results of the OREI project,
17 giving them the time to trial and implement
18 these new materials.

19 So I'd be the first to say that it
20 may take longer. We don't feel like there's
21 room for another extension because we have had
22 an extension and then another extension. I

1 think it's unfortunate how that happened. I
2 think we do feel like there needs to be a hard
3 date to respond to consumers, but I think that
4 it's going to be doable for many. There will
5 be risks. Again, it's not a question of if,
6 it's when.

7 There will be risks, there will be
8 loss. But I think that, in terms of the bell
9 curve and being able to shift as many
10 certified operators over as possible, I think
11 we can capture the most with a 2017 deadline.
12 But the key with that one year, it doesn't
13 sound like much but I think it's a critical
14 year of grower outreach and education.

15 CHAIRPERSON STONE: Jean?

16 MEMBER RICHARDSON: Gwendolyn, I
17 think, I believe that it was about 1957 that
18 fire blight arrived in Europe and the
19 Europeans have a zero tolerance towards
20 antibiotics for controlling it. If they've
21 managed to control it for this length of time,
22 why can't we do without it in the Northwest?

1 MS. WYARD: Right. I hope you ask
2 that question to experts tomorrow, as well,
3 that can talk more about the differences, the
4 climate differences between Europe and the
5 United States because I don't have all that
6 background information. But, you know, we
7 have grown up with the use of tetracycline and
8 streptomycin. That's a key part of what's
9 going on. It's been allowed since the
10 implementation of 2002. It was allowed in the
11 private standards. So that's been a tool in
12 the toolbox, so we haven't learned to do it
13 otherwise. Now is our opportunity to learn to
14 do it in a different manner. We've always had
15 that material.

16 CHAIRPERSON STONE: Harold?

17 MEMBER AUSTIN: Gwen, your bell
18 curve comment that you made just a moment ago
19 talking about the impact that the extension
20 would have going back out to 2017, what do you
21 feel with the various stakeholder groups that
22 you work with that are a part of OTA and that

1 you come in contact with, what would the
2 impact be if we were to allow the existing
3 expiration date of 2014 stay in place, rather
4 than the proposal that we have, not going out
5 to `17 but the proposal we have at `16? What
6 would you see that variation or that impact
7 be, the difference between that, to the
8 organic stakeholders as a whole?

9 MS. WYARD: Okay. I want to make
10 sure I understand this correctly. The
11 difference between a 2016 and a 2017 or the
12 2014?

13 MEMBER AUSTIN: The `14. If we
14 were to allow the expiration date to take
15 place as it's on the books right now of
16 October 21st, 2014, rather than going to
17 either -- right now, I'm just looking at the
18 proposal, 2016.

19 MS. WYARD: So I'm not exactly
20 prepared with numbers, in terms of number of
21 acres and dollar costs, but I know that will
22 be presented. I think the difference, if 2014

1 is the deadline, growers will not have
2 confidence in the use of the alternative
3 material. So going back to, you know, at
4 least speaking in the Northwest and
5 Washington, the survey that was conducted, 93
6 percent of those growers said that they would
7 exit organic production. So you can take 93
8 percent of growers, and then you can
9 extrapolate and figure out, you know, what the
10 market stats are for the amount of organic
11 produce or apples and pears that are coming
12 out of Washington.

13 Ninety-three percent is huge.
14 Ninety-three percent of the growers were to
15 exit organic certification, it speaks for
16 itself.

17 MEMBER AUSTIN: A follow-up on
18 that. Would there be a discrepancy between the
19 commodities, between apples and pears?

20 Because we have heard some indications that
21 the research has lagged a little bit on pear
22 production for the research for fire blight

1 control versus what the inputs being put into
2 the apple. So would you see a difference in
3 the amount of acreage taken out or a
4 percentage of acreage taken out of pears
5 versus apples?

6 MS. WYARD: I think so. I think
7 there's a real concern, and I appreciate you
8 bringing that up. I think we are
9 particularly, we talk a lot about the
10 Northwest because that's a lot of where the
11 research is being conducted, that's a lot of
12 where the information is coming out of. And
13 we talk a lot about apples and maybe not as
14 much about pears, at least in the discussions
15 that I've been hearing about. I don't think
16 that the pear growers, particularly pear
17 growers down in California, they are not as
18 aware of the new and emerging materials and
19 they are not going to have, necessarily, the
20 exposure in the timely fashion that we are in
21 the Northwest simply because of the outreach
22 that's already happening. I mean, I know that

1 Ken Johnson and other researchers, they're
2 already out in the field, going out to all the
3 conferences. People are aware that these
4 materials are out there. They know this issue
5 is happening, but I don't think we can say the
6 same around the country. And I think that
7 there are conditions, particularly in
8 California for pears, where the materials that
9 we have available may not work as well for
10 pears as they do for apples.

11 CHAIRPERSON STONE: Jay, if you'd
12 wrap this up for us.

13 MEMBER FELDMAN: I'll try.
14 Thanks, Gwendolyn. As you know, the Board,
15 the NOSB has responsibility to balance not
16 only need, to address not only need but also
17 hazard and consumer expectations. In the
18 context of this decision-making, we're hearing
19 a lot of comments like yours that there is a
20 tremendous need out there, and I suspect
21 throughout the rest of this meeting we'll hear
22 that multiple, multiple times.

1 I'm wondering, as a trade
2 association and given the interface that you
3 have with the consuming population, in light
4 of your mission to represent the growers and
5 the community producers, have you looked and
6 what have you concluded? Have you looked at
7 the literature on the urgency associated with
8 the bacterial resistance, and have you
9 considered the impact associated with consumer
10 expectation and impacts on long-term integrity
11 or perception of integrity on behalf of the
12 consumer population? And how have you
13 factored that into your positions, given that
14 your oral statements didn't address these two
15 issues, as far as I heard. I might have
16 missed it, but these two issues at all and I
17 didn't see it either in your public comments,
18 written comments, as well. So I appreciate
19 you addressing that.

20 MS. WYARD: Thank you, Jay. Yes,
21 we absolutely share the concerns. We didn't
22 put anything in our comments because we really

1 didn't want to spend any of our breath
2 defending or saying anything good about
3 antibiotics. We want to see their use end.
4 And we believe that if we give the time
5 needed, which is not very much time, we will,
6 in fact, decrease the use of antibiotics,
7 where if we pull the plug too soon we will
8 increase the use of antibiotics because of the
9 number of growers that will exit organic
10 production and not only increase the use of
11 antibiotics but also pesticides. To say that
12 they can no longer be allowed in 2014 in
13 organic production is no guarantee that it's
14 going to decrease or end the use of
15 antibiotics because those growers may very
16 well, based on the data that we see, go to
17 conventional production.

18 So for, you know, to consider
19 where we're at right now, with such success on
20 the horizon, we hear, based on everything that
21 we're looking at, that this, that you have to
22 look at what you lose and what you gain. And

1 we very well could increase the use of
2 antibiotics by putting a deadline at 2014.

3 MEMBER FELDMAN: I appreciate that
4 perspective. I guess my concern, and this
5 goes to the other part of my question, the
6 consumer issue, is how do you measure, as a
7 trade association, the impact on overall
8 public perception of the integrity of organic
9 and what it stands for and what the label
10 means and future growth of the market, given
11 public perception of our resistance perhaps or
12 perceived resistance to seriously address the
13 urgency of the public health issue that we're
14 facing now, not next year, not two years,
15 three years, or four years but right now?

16 MS. WYARD: Yes, yes, that is a
17 tough situation, and it's unfortunate that we
18 are where we're at, that there has been so
19 much public media about these extensions
20 because there's misinformation about why these
21 extensions have occurred. I think that's why
22 we -- I can see where keeping it in the sunset

1 cycle would be preferred, but we also see the
2 concerns in how that hasn't necessarily
3 happened. The reason we are committed to 2016
4 - 2017 as a deadline because we absolutely
5 hear and see the concern from the consumers
6 and we have to commit to that deadline.

7 MEMBER FELDMAN: Thank you.

8 CHAIRPERSON STONE: Thanks,
9 Gwendolyn.

10 MS. WYARD: Yes, thank you very
11 much.

12 CHAIRPERSON STONE: So, Board
13 members, the gavel will fall at 10:30 to
14 restart this session. And, Trudy Bialic, if
15 you will also be ready at 10:30. Thank you.

16 (Whereupon, the above-entitled
17 matter went off the record at 10:18 a.m. and
18 resumed at 10:30 a.m.)

19 CHAIRPERSON STONE: Can the Board
20 members take their seats? We gained a little
21 time in the schedule, but we want to use the
22 extra time. I know the networking and talking

1 amongst yourselves is a critical part of this
2 process, but, out of respect, I'd like to get
3 back in session.

4 So a couple of comments. We're
5 running about 45 minutes ahead, so if you're
6 signed up for public comment you can kind of
7 scootch it up about 45 minutes or so. We may,
8 in fact, if we can maintain that leeway, we
9 may, in fact, adjust the agenda a little bit
10 at this point. I want to ask if two people
11 that are signed up for policy comments
12 tomorrow morning -- excuse me. Let me scroll
13 down here. Is Theo Woods here? Theo. And
14 I'll wait until after lunch and give him time
15 to get in here.

16 So we're about 45 minutes ahead
17 right now, but we may use that up this
18 afternoon. And if you're speaking, if you're
19 signed up to speak with Michelle, there is a
20 sign-up sheet outside that we can verify that
21 you are, in fact, here, made the trip to be
22 here. That might help us with scheduling.

1 And we may, in fact, use 15 minutes of this
2 for an extra 15 minutes for lunch because it
3 is hard for everybody to get out and back and
4 get back in on time.

5 So with that, we're back in
6 session, and we have Trudy with PCC. And let
7 me see who's on deck, Trudy, before you get
8 started. Excuse me. Pat Kane, you're on
9 deck. No, Trudy, you're up. Pat Kane is
10 getting nervous getting ready. And Michelle
11 is not here -- you got it, Lisa? Thank you.
12 Okay, Trudy.

13 MS. BIALIC: Ready to go?

14 CHAIRPERSON STONE: Yes, ma'am.

15 MS. BIALIC: Thank you very much
16 for the opportunity to be here and comment.
17 My name is Trudy Bialic. I am the director of
18 public affairs for PCC Natural Markets. We're
19 a retailer in Seattle. I'm not going to
20 restate the written comments that we
21 submitted, but I do want to comment in general
22 about concerns over what is perceived or

1 appears to be a growing allowance for
2 synthetics.

3 On behalf of the 49,000 people who
4 own our stores, we realize that it is very
5 challenging for you to review every material.
6 But shoppers, especially long-time organic
7 shoppers, are concerned about the synthetics
8 already allowed. Remember back at the point
9 of the Harvey lawsuit in 2005 there were only
10 38, and right now we're at over 200.

11 And many shoppers are just finding
12 out about DHA and carrageenan, and they're
13 puzzled, they're confused, and they want to
14 know how it was that NOSB approved them.
15 We've had to post signage about DHA, and now
16 our nutrition educators say some shoppers are
17 reporting improvements in their
18 gastrointestinal disorders after they stopped
19 eating foods with carrageenan. It's not
20 proof. It's anecdotal. But after reading the
21 available research, customers and even my
22 bosses at my company are asking how it was

1 that NOSB approved these.

2 In fact, I believe it was every
3 consumer organization argued against DHA and
4 carrageenan at the time, against the
5 allowances. But NOSB sided with industry, and
6 that's a perception that carried over, I
7 think, from even with the poultry standards on
8 the space allocations.

9 So that brings me to my request by
10 the Handling Committee for comments on other
11 ingredients. We did a survey in 2011, and we
12 resubmitted that to you, where we found that
13 organic shoppers expect all ingredients,
14 including ingredients of ingredients, to be
15 organic or on the National List. And that's
16 why we support option D, no ingredient of any
17 kind should be in organic food unless it is
18 organic or on the National List. Nothing in
19 OFPA distinguishes between ingredients in
20 other ingredients.

21 As far as tetracycline, which I
22 recognize is not a synthetic, but as far as

1 tetracycline and tree fruit goes, I do want to
2 say that I assumed incorrectly that the
3 consumer empathy for challenges faced by
4 organic farmers would trump concerns about
5 antibiotics, the support for farmers being so
6 high as it is. But I was wrong.

7 I talked with countless shoppers,
8 and all but one of them said antibiotics do
9 not belong in organic food period. Their
10 views did not change when given the arguments
11 for an extension.

12 After talking with our primary
13 apple and pear growers, we had no choice but
14 to change our company position. So now we
15 oppose any extension for tetracycline. We
16 just have to go where our constituents'
17 interests take us. We have to go where the
18 information takes us. Thank you very much.

19 CHAIRPERSON STONE: Thank you,
20 Trudy. Questions for Trudy? Calvin?

21 MEMBER WALKER: Could you share
22 with us your survey? Could you share with us

1 your survey and how it was done and some of
2 the conclusions again?

3 MS. BIALIC: Well, the methodology
4 is included in the report itself. We surveyed
5 almost 1,500 shoppers. We did it through
6 online and through, as I recall, through
7 print, as well. The results were pretty clear
8 and conclusive. There was just no other way
9 of concluding, but the consumer does not want
10 additives and they don't want synthetic
11 additives of any kind. Basically, they
12 believe that organic foods have inherent
13 healthy values as they are. They don't need
14 anything extra to be healthy.

15 CHAIRPERSON STONE: And thank you.
16 They are very detailed in her written comments
17 so appreciate that. We can refer to -- one
18 more. Joe?

19 MEMBER DIXON: Hi, Trudy. Thank
20 you. So you said you talked a lot recently
21 with consumers about concerns about
22 antibiotics in tree fruit. Can you walk us

1 through sort of the methodology and the
2 questions you used in those conversations?

3 MS. BIALIC: Mostly, I would say
4 it was through being in the stores. We were,
5 I was in stores. I took phone calls. I
6 actually did it through outreach, through
7 being at some of the stores, set up tables and
8 just actually greeted people when they were
9 coming in.

10 It's been over, really over the
11 last couple of months, but it began probably
12 two years ago when I first heard about it. It
13 was on a quiet level. We didn't talk much
14 about it but until the last couple of months.

15 CHAIRPERSON STONE: Thank you,
16 Trudy.

17 MS. BIALIC: Thank you.

18 CHAIRPERSON STONE: Pat Kane is
19 up. Micah Frye is on deck. Is Micah here?
20 Not seeing Micah, so that puts Amha Belay on
21 deck.

22 MS. KANE: I would like to thank

1 the Board for this opportunity to provide
2 these comments. I'm Pat Kane. I'm the
3 coordinator of the Accredited Certifiers
4 Association. We did submit written comments
5 on several proposals, and I'm just going to
6 summarize our comments here but also urge you
7 to review our written comments.

8 Regarding the auxiliary and other
9 ingredients -- dear, where'd it go -- we were
10 supportive of the Subcommittee proposal and
11 request that the Board adopt this proposal.
12 We do suggest that the NOSB recommend to the
13 National Organic Program that any instruction
14 or final guidance contain a clear definition
15 of other ingredients, as this is not contained
16 in the regulation.

17 The first three paragraphs of the
18 Subcommittee definition should be included in
19 any instruction or final guidance. Sorry.
20 I'm having trouble here. Oh, dear.

21 ACA agrees with the concept of
22 transition period for operators to bring their

1 products into compliance to prevent the
2 destruction of markets. We also believe that
3 moving cleaners, sanitizers, and
4 disinfectants, and other non-food substances,
5 such as the boiler additives, to their own
6 dedicated section of the National List will
7 provide clarity that these materials are not
8 ingredients. So we did provide some wording
9 in our written comments about that.

10 Regarding the tetracycline
11 petition material proposal, we believe the
12 entire organic community is committed to
13 developing and implementing a non-antibiotic
14 approach to controlling fire blight in apple
15 and pear production. ACA supports the
16 Subcommittee's acknowledgment that any
17 expiration date for oxytetracycline must allow
18 time for research on alternatives to draw the
19 conclusions and for those alternatives to go
20 through the process to become commercially
21 available in the marketplace.

22 We support the new expiration date

1 of October 21, 2016. If effective control
2 tools are not available and fire blight
3 threatens the viability of an orchard, despite
4 preventative efforts, ACA believes that
5 farmers will prioritize their agricultural
6 livelihood over retaining organic
7 certification and access to the organic
8 market. By allowing this time, the
9 Subcommittee will ensure growers have adequate
10 tools to remain in organic production and
11 provide consumers access to organic products.

12 We also support the Subcommittee
13 resolution pertaining to the commitment to a
14 phase-out of the material while asking
15 certifiers to include in organic system plans
16 an annual increase in the extent and/or number
17 of alternative practices and materials that
18 are trial for controlling fire blight. As
19 certifiers, we will do our part to move the
20 resolution forward, and throughout the two-
21 year extension the use of oxytetracycline will
22 continue to be highly regulated.

1 We note that producers may only
2 apply synthetic materials when physical,
3 biological, and cultural practices are not
4 effective, provided conditions are documented
5 and approved in the organic system plan. The
6 certification process effectively verifies
7 that growers are following their plan and
8 operating in compliance with organic
9 requirements.

10 Phasing out antibiotics offers the
11 opportunity for the NOSB to engage in lead
12 agricultural experts, growers, and consumers
13 in a public-private effort to cooperatively
14 strengthen the organic label from farm to
15 table. Thank you very much. I apologize for
16 the --

17 CHAIRPERSON STONE: Thank you,
18 Pat. Question, Jay?

19 MEMBER FELDMAN: Thanks, Pat. I
20 have a question for you.

21 CHAIRPERSON STONE: Question, Pat.

22 MEMBER FELDMAN: Thanks. You've

1 mentioned the organic systems plan both in
2 your written and oral comments. I'm curious
3 as to whether, within those plans, there are
4 any model fire blight-resistant strategies
5 that are viewed as programmatic? In other
6 words, programs that the community of
7 certifiers and inspectors believes are
8 preventive in nature, that are specific, and
9 should be incorporated into every organic
10 systems plan where fire blight may be a
11 threat. Is there such a plan or model
12 programmatic language that is incorporated
13 across the board uniformly in all organic
14 systems plans?

15 MS. KANE: I would doubt that at
16 this point. I would believe that that's
17 something that could be worked on, but it's up
18 to the grower to tell the certifier what the
19 plan is. I mean, you can answer, you can put
20 questions in there, and they can respond to
21 that.

22 MEMBER FELDMAN: And so, as a

1 result, we can expect that there's wide
2 variability in the degree to which preventive
3 measures are adopted in various areas, various
4 farms or range of farms?

5 MS. KANE: Currently?

6 MEMBER FELDMAN: Currently.

7 MS. KANE: I would suspect there
8 is, yes.

9 MEMBER FELDMAN: Okay, thank you.

10 CHAIRPERSON STONE: Zea?

11 MEMBER SONNABEND: Thank you, Pat.

12 Did the ACA talk about how workable they think
13 the other ingredients proposal is in terms of
14 being able to take NOSB deliberations into the
15 field as certifiers?

16 MS. KANE: Yes, we did. It was my
17 glitch that I did not cover that here. We
18 supported the other ingredients
19 recommendation. We thought that the
20 individual other ingredients do not need to be
21 on the National List, but we did want them
22 included on the review checklist so that there

1 was some means of identifying what had been
2 looked at. So, yes, they thought it was
3 workable.

4 CHAIRPERSON STONE: Thank you,
5 Pat. Amha Belay is up. Theresa Griffith? Is
6 Theresa here? Is on deck. Amha?

7 MR. BELAY: Thank you for the
8 opportunity to provide our comment. The
9 comment will be on organic spirulina
10 production. My name is Amha Belay, and I'm
11 senior vice president and chief technology
12 officer of Earthrise Nutritionals, and I'm
13 here representing two companies: Cyanotech
14 Corporation based in Hawaii and Earthrise
15 Nutritionals based in California, the only two
16 past and present producers of spirulina.

17 It will be remembered that
18 Cyanotech Corporation and Earthrise
19 Nutritionals produce organic spirulina until
20 2005, following the regulations of the land-
21 based crop production. The two companies
22 stopped production due to the limitation of

1 the use of Chilean nitrate to only 20 percent
2 of total input.

3 The two companies have now
4 researched and considered the use of
5 alternative organic nutrients and may wish to
6 resume organic production. However, the
7 status of organic spirulina production and
8 certification and the current regulations for
9 crop production has been put into question by
10 NOSB to the extent that separate regulations
11 and aquaculture regulation and/or soilless
12 crop production regulations have been
13 considered and are against being considered.

14 A 2008 document by the NOSB
15 describes that, "The Crops Committee of the
16 NOSB is gathering information and discussing
17 the formation of a recommendation to the NOP
18 for rulemaking on the subject of soilless
19 growing systems in organic production."
20 Spirulina is among three categories of
21 production considered under a soilless organic
22 production. However, the document has raised

1 several questions, as described in the full
2 2008 report. It is also noted that the NOSB
3 was asking opinions of certifiers about this
4 issue for possible rulemaking.

5 It, therefore, appears that there
6 is no regulation regarding organic spirulina
7 production at the moment. Since there is
8 organic spirulina imported into the United
9 States and sold as USDA organic and with USDA
10 logo, the question arises as to what
11 regulation is applied to organic spirulina
12 certification of imported products currently
13 and for those who may wish to produce organic
14 spirulina in the USA, such as Cyanotech
15 Corporation and Earthrise Nutritionals.

16 The answers to these questions by
17 the NOP are pertinent to our future growth and
18 development as spirulina companies in the USA.
19 We would like to have a clear guideline on
20 this matter in order to plan our business
21 strategy on solid grounds with respect and
22 respecting, following the appropriate

1 regulations.

2 We eagerly await for a response.

3 Thank you very much.

4 CHAIRPERSON STONE: Thank you,

5 sir. Are there any questions? All right.

6 Thank you very much.

7 MR. BELAY: Thank you.

8 CHAIRPERSON STONE: While Theresa

9 is getting ready, Bob Durst, you're on deck.

10 And just so you'll know, Michelle is out

11 trying to pick the lock on the cover over the

12 thermostat so she can warm it up in here.

13 Okay. Thank you.

14 MS. GRIFFITH: Okay. My name is

15 Theresa Griffith. I am the president of

16 Somebody Cares, an international relief

17 organization which assists people with chronic

18 illness, autism, and ADHD. This song

19 represents what we have seen and known to be

20 true.

21 (Whereupon, a song was performed

22 by the commenter.)

1 CHAIRPERSON STONE: Thank you very
2 much. Very good. Bob, you going to top that
3 one, buddy? And Natasha Gallegos is up next.

4 MR. DURST: I just wanted to make
5 a couple of comments based on the antibiotic
6 scenario that's going down here. As a
7 consumer, what I see as a real concern on
8 their part is the use of antibiotics primarily
9 in the livestock industry where there's a lot
10 of carryover and a possible health risk of
11 antibiotic resistance showing up in food, the
12 food supply, etcetera, that leads to human
13 health risk. I don't see that same risk
14 showing up at all in the use of tetracycline
15 in an orchard situation.

16 So the loss that's been mentioned
17 of organic orchards and production of organic
18 apples and pears, et cetera, which would be at
19 risk by restricting something used for fire
20 blight control is a real concern to me,
21 whereas I think the consumer perception of
22 antibiotic use just doesn't relate and

1 translate into its use in an orchard where it
2 does in the livestock production. So I'd like
3 to see it extended and see that consumers can
4 still get organic apples and pears without
5 having orchards taken out because of fire
6 blight. Thanks.

7 CHAIRPERSON STONE: Thanks, Bob.
8 Question? Jean?

9 MEMBER RICHARDSON: So, obviously,
10 I'm concerned about residues of antibiotics
11 possibly in harvested fruit, and you said you
12 just don't see that as a problem. Do you have
13 any scientific data to support your statement?

14 MR. DURST: No, I certainly don't
15 have any data along those lines, and I'm not
16 sure that anybody does. But being a food
17 scientist and having a lot of knowledge of
18 this sort of thing in general, the timing
19 between when antibiotics or tetracycline is
20 used for fire blight control in the harvesting
21 of apples is such a long time difference that
22 I can't imagine that there's residue concerns

1 that would lead to health concerns of any
2 kind.

3 CHAIRPERSON STONE: Okay. Jay?

4 MEMBER FELDMAN: Thanks, Bob. I
5 want to follow-up on Jean's comment because
6 we're hoping to have a scientific discussion
7 here. As you know, we're informed, as a
8 board, by technical review documents that are
9 supplied to the Board in its deliberations.
10 Have you had a chance to review the technical
11 review document for tetracycline?

12 MR. DURST: I have not. I'm
13 sorry.

14 MEMBER FELDMAN: Okay. If you do,
15 you have a couple of days, it would be helpful
16 for you to review the documents on the AMS NOP
17 website because there is, there are studies in
18 there that show resistant bacteria. Whether
19 it's commensal bacteria or human pathogen
20 doesn't matter. It's the question of lateral
21 gene transfer that eventually makes its way as
22 resistant genes into human pathogens, which is

1 what the Infectious Disease Society of America
2 is concerned about as a public health crisis,
3 as an extreme public health crisis.

4 So you, as a scientist, it would
5 be helpful if you were to look at that
6 documentation, as well as the Schnabel and
7 Jones citation that's in the TR that shows
8 resistant bacteria in the fields where these
9 materials are used. In addition to that, of
10 course, the American Academy of Microbiology
11 is extremely concerned, as a professional
12 society, about the use of antibiotics in
13 crops, as well as in animal production. If
14 you talk to infectious disease docs, they say
15 by the time you see the problem it's too late.

16 So I guess knowing what you know
17 as a scientist, it would be helpful to get
18 your assessment based on reading the
19 scientific literature. But, also, I'm
20 interested in whether you view the organic
21 statute, given the science, what is known,
22 what is uncertain, what we understand is

1 scientific effects or process, how you apply
2 that in a preventive or precautionary way and
3 how we should apply that under the Organic
4 Foods Production Act. What is your assessment
5 of our duty as a board to try to prevent
6 problems up-front, given scientific
7 uncertainty in balance with what we know about
8 mechanisms that are at play here?

9 MR. DURST: Off the cuff, and it
10 really is just that, and, again, I don't have
11 the data to back it up, is that the amount of
12 resistance that one would find and the
13 transmission routes that one would experience
14 from field crops and orchard crops is
15 significantly different than it is in the
16 livestock realm where we know that there's
17 antibiotic resistance cropping up and they're
18 leading to human pathogens. So, again,
19 without having read the literature that you
20 suggested, which I will go back and do, I just
21 don't see that as a major concern or as a
22 significant factor as it is in the livestock

1 side of things.

2 CHAIRPERSON STONE: Zea?

3 MEMBER SONNABEND: Hi, Bob.

4 Wearing your consumer hat that you came up
5 here with, have you talked with other
6 consumers or what's your sense of how many of
7 your fellow consumers might agree with your
8 opinion?

9 MR. DURST: Quite a number of them
10 have. Because I wear that hat, a lot of
11 people come to me and ask questions about what
12 I think about various organic things, and even
13 animal scientists and livestock people that I
14 work with at the university have said that
15 they're concerned about it from that
16 standpoint but they just don't, they don't get
17 why there's a problem with it in the crop side
18 of things. So my sense is that it's sort of
19 misdirected concern on the consumers' part
20 that they're equating antibiotic use in
21 livestock and antibiotic use in crops and
22 saying they're one in the same when the

1 concerns are really significantly different
2 and the risks are significantly different.

3 CHAIRPERSON STONE: Thanks, Bob.
4 And Natasha Gallegos, are you here? Not
5 seeing Natasha. Sommer Gard? Sommer Gard?
6 Okay. Lynn Huffman? Lynn? Yelena Korchman?
7 Yelena? Albert Strauss? And let me see who's
8 on deck before you start, Albert. Gabriella
9 Nunez? Is Gabriella here? What about Erik
10 Paul? Like I said, we had some confusion
11 about a week or two ago. Laura Reed? Okay.
12 Judith Reedy? No Judith. Amy Wachspress?
13 Okay. We're looking at moving up some of
14 tomorrow's agenda to today to give us more
15 time tomorrow. Kathie Weinmann, Weinmann?
16 Jennifer Wilcox? Michelle could tell that
17 something was going on here. Jessica Zern?
18 Jessica? And we know Terry Shistar is here,
19 so it looks like, Terry, you're on deck.
20 Okay. There you go.

21 MR. STRAUSS: Okay. Thank you for
22 the opportunity to speak today. My name is

1 Albert Strauss. I'm an organic farmer from
2 Northern California, and I'm also the founder
3 of Strauss Family Creamery. We produce
4 certified organic dairy products, including
5 milk, yogurt, butter, ice cream, sour cream,
6 and Greek yogurt. And we distribute in the
7 Western United States. My dairy farm in
8 Marshall was the first certified organic dairy
9 farm west of the Mississippi River, and my
10 creamery was the first 100-percent certified
11 organic creamery in the United States.

12 In 2006, I found my certified
13 organic corn was contaminated with GMOs by up
14 to six percent. In the following two years,
15 I implemented a GMO testing program at our
16 dairies and the creamery to keep GMOs out of
17 our processes and products. In 2010, the
18 creamery and our dairy farms became the first
19 to achieve non-GMO project verification.

20 I'm here to talk about the threat
21 of GMO contamination to organic crops and the
22 importance of non-GMO verification in the

1 organic industry. GMO contamination is
2 occurring in organic crops. A study from the
3 Organic Trade Association in 2011, which I
4 display, found that more than 30 percent of
5 certified organic corn was contaminated and 11
6 percent of that exceeded the EU threshold of
7 0.9 percent.

8 This puts organic dairy farms like
9 mine at risk. It is increasingly difficult to
10 source certified organic feed for my cows, and
11 the prices are continuously rising. The
12 deregulation of genetically-modified alfalfa
13 has added to this problem. The supply of
14 organic feed will only decrease as GMO
15 contamination increases.

16 Our consumers expect our products
17 to be non-GMO. We want to make sure that we
18 want -- excuse me. We want to make sure that
19 what we eat is free of GMOs. I believe that
20 non-GMO verification is essential.

21 Organic practices don't allow for
22 the use of GMOs, and the organic seal should

1 reflect that. I believe that organic
2 certification is the gold standard, and it
3 should include non-GMO verification. I,
4 therefore, suggest that we have a meaningful
5 threshold for GMO contamination that is
6 defined and implemented in the National
7 Organic Program and the National Organic
8 Program requires a testing and verification
9 standard for GMOs.

10 On a different subject, I also
11 want to urge the NOP to make the certification
12 processes easier for farmers. The burden of
13 all the paperwork is tremendous and very time
14 consuming. If there is a way in which we can
15 make the process simpler and more efficient,
16 I, as a farmer, would very much appreciate it.
17 Thank you.

18 CHAIRPERSON STONE: Thank you. Is
19 there questions? Francis?

20 MEMBER THICKE: Thank you, Albert.
21 Do you have any suggestions on the threshold
22 limit for GMOs in organic and also the testing

1 procedures that would be required or
2 frequency?

3 MR. STRAUSS: Well, for feed or
4 for seed, I mean, I think that, as long as we
5 get a testing and verification program in
6 place, the thresholds can start higher and you
7 can tighten them over time. And you have to
8 start with a program. You can't start -- if
9 you get stuck on thresholds or rejection, you
10 know, if you have to reject a load if it's
11 over a threshold, I think you get diverted
12 away from the goal of eliminating GMOs from
13 our food supply.

14 MEMBER THICKE: Would you think,
15 though, that testing, routine testing of feed
16 would be necessary or seed only perhaps?

17 MR. STRAUSS: I think everything.

18 MEMBER THICKE: Everything.

19 MR. STRAUSS: There is all these
20 points of risk. Seed, feed, ingredients in
21 products all need to be tested and verified
22 and have strict analysis on each of them. It

1 could be started with a strip test, but I
2 think we need to start somewhere and get it
3 implemented. And it should be under the
4 organic program.

5 CHAIRPERSON STONE: Jean?

6 MEMBER RICHARDSON: Mr. Strauss, I
7 know you weren't testifying on GMO vaccines
8 for cattle, but I wonder if you would, as a
9 dairy farmer, you would have some opinion or
10 explain to us how you verify that none of the
11 vaccines that you give to your dairy cattle
12 have GMO in the vaccines?

13 MR. STRAUSS: We contact each of
14 the manufacturers and get a letter stating how
15 they manufacture their vaccines and to verify
16 they're not from genetically modified, derived
17 from genetic modification.

18 MEMBER RICHARDSON: And does that
19 work well for you? So you get written
20 documentation to support non-GMO?

21 MR. STRAUSS: Yes.

22 MEMBER RICHARDSON: Yes. Thank

1 you.

2 CHAIRPERSON STONE: Nick?

3 MEMBER MARAVELL: Jean asked my
4 question.

5 CHAIRPERSON STONE: And Jay?

6 MEMBER FELDMAN: Thank you.

7 Thanks for being here. I'm interested if you
8 have any thoughts on GMO contamination
9 prevention and, as we, as a board, try to
10 communicate the views of the organic community
11 to the Secretary of Agriculture, what we
12 should be saying, as a board, relative to
13 prevention of contamination?

14 MR. STRAUSS: So what I think the
15 OTA study showed is, I didn't show all the
16 slides in the whole study, but, once you test
17 and verify a required testing and verification
18 from your suppliers, the contamination level
19 went dramatically down. The corn actually
20 preserved and organic that was tested was only
21 at, I think, 11 percent contamination level
22 above the 0.1 percent, compared to organic

1 that wasn't tested, you know, at the 30
2 percent.

3 So just requiring a testing
4 regiment reduced the GMO contamination. I
5 think there's unintentional -- people aren't
6 paying attention to GMOs if they're not
7 required to. Does that make sense?

8 MEMBER FELDMAN: Yes, it does.
9 I'm interested, though, further down the chain
10 where we have co-existence, say, you know, out
11 in the fields, in terms of production of
12 genetically-engineered crops and conventional
13 organic crops that are not GMO. How we
14 protect the purity of the crop, do you think
15 about that as an advocate for changes in
16 practices that go beyond the scope of this
17 board, certainly, but affect our ability, at
18 the end of the day, to deliver a product to
19 you as, you know, as a user of feed, how we
20 can assure the delivery of a product that is
21 free of GMO contamination?

22 MR. STRAUSS: I think all the seed

1 has to be tested and verified. I don't think
2 there's any way around it.

3 CHAIRPERSON STONE: All right.
4 Thank you. Okay. Terry is up. David Moore,
5 David Moore here? Okay. David Moore is on
6 deck.

7 MS. SHISTAR: My name is Terry
8 Shistar, and I'm on the Board of Directors of
9 Beyond Pesticides. This slide shows some of
10 our current and former board members. We have
11 a long history of involvement with organic
12 production. Our roots are in the problems of
13 agriculture, from poisoning of farm workers to
14 contaminated food, soil, air, and water. We
15 have promoted organic production and the
16 organic model in non-production situations as
17 a solution to pollution.

18 If you visit our website, you'll
19 see a section called eating with a conscience.
20 It's there because, for us, organic production
21 is not only about good, safe food, it's about
22 saving the Earth and those who live there.

1 I'm going to talk about restoring
2 the public's expectations of organic. We've
3 submitted comments on most of the issues
4 before the Board, but I'll focus on three
5 today: tetracycline, inert ingredients, and
6 other ingredients.

7 The public has a strong
8 expectation that antibiotics are not used in
9 organic production. This may be a
10 misconception, but it's one promoted by the
11 organic producers and even the USDA. There
12 are reasons that the public does not want
13 antibiotics used on organic apples, just as we
14 don't want carcinogens used on them. These
15 reasons are based on science and personal
16 experience.

17 The science was presented to you
18 in the minority position of the tetracycline
19 report. My personal experience includes a
20 strep infection that failed to respond to a
21 couple of antibiotics, as well as several
22 bouts of my son's ear infections that required

1 more than one antibiotic. I'm sure all of you
2 have had similar or worse experiences.

3 We were disappointed with the
4 report of the majority of the Crops
5 Subcommittee. It reflects the same kind of
6 blind denial as when conventional apple
7 growers denied, and some still deny, the
8 science concerning alar. We would like to
9 prevent a public revolt against organic apples
10 and organic food in general, similar to the
11 alar rebellion that was so costly to apple
12 growers.

13 From the growers' perspective,
14 there will never be a right time to end the
15 use of antibiotics. There will always be
16 another silver bullet on the horizon, another
17 reason to postpone the decision for another
18 two years. The decision to eliminate them has
19 been put off for too many years. The only
20 decision you can make that will restore the
21 public's expectations is to uphold the 2014
22 expiration date.

1 As you all know by now, so-called
2 inert ingredients in pesticide products are
3 not biologically or chemically inert. In
4 fact, because OFPA criteria have been applied
5 to active ingredients, these additives,
6 especially those formerly on List 4B, are
7 probably the most toxic ingredients in the
8 pesticide products used in organic production.

9 We congratulate the Board for
10 undertaking the project and reviewing these
11 mostly secret ingredients, and we urge you to
12 start immediately on the review to restore the
13 expectation that hazardous chemicals are not
14 used in organic production.

15 So-called other ingredients, also
16 known as ingredients within ingredients in
17 processed organic foods, did not meet the
18 public expectations, which can be simply
19 stated all ingredients of a product labeled
20 organic must be either organic or on the
21 National List for that purpose. The public
22 has a right to this expectation because it is

1 a law. In place of this very clear policy,
2 the Handling Subcommittee proposes to make
3 distinctions that are not in OFPA but to allow
4 ingredients that do not meet OFPA criteria and
5 to ignore existing law, all, apparently, in
6 order to codify mistakes that have been in the
7 past, that have been made in the past.

8 Again, the Board needs to take
9 action to restore public expectations of
10 organic food. Public expectations are what
11 caused people to buy organic food. You cannot
12 ignore what the public expects without
13 destroying the market for organic food for
14 those of us, and for those of us who place our
15 faith in organic production to heal the Earth,
16 the destruction of the organic brand would be
17 tragic. Thank you.

18 CHAIRPERSON STONE: Very good.
19 Steve, she got you on that one, buddy.
20 Questions? Okay. Thank you very much, Terry.
21 Thank you for your written comments, as well.
22 We've got David Moore is up and Harriet Behar

1 on deck.

2 MR. MOORE: All right. Good
3 afternoon or good morning. I'm David Moore.
4 I'm a California pest control advisor and
5 qualified applicator and I work for Neudorff.
6 For over a year now, I've been speaking to
7 agronomists, organic growers, and extension
8 farm advisors about the issues of organic weed
9 management, and I hear one answer and that is
10 we need more tools.

11 There's already a powerful
12 environmentally favorable and allowed material
13 that should be among those tools, and that
14 material is soap. The environment and
15 toxicological advantages of soap pesticides
16 are very well known and, yet, their use for
17 weed control is illogically and capriciously
18 restricted on food crops.

19 I'm sure you all know the language
20 of OFPA. Soaps are explicitly in OFPA as
21 allowed synthetic materials. If that's not
22 original intent, I don't know what is.

1 Support for lifting the
2 restrictions on herbicidal soaps for food
3 crops comes from growers of all stripes
4 because all growers have problems with weeds.
5 But weed control is the most significant
6 challenge facing not just organic agriculture
7 but all agriculture. It's been an article of
8 faith for many years and, yet, the flimsiest
9 of logic keeps this material from growers of
10 food crops.

11 Organic regulation prides itself
12 on being a process standard, not a product
13 standard. But the restriction on soaps stands
14 in the way of better process.

15 I won't try to detail the many
16 reasons why herbicidal soaps are consistent
17 with sustainable organic production systems.
18 I'm here to encourage each of you to consider
19 this for yourself. Ask somebody from the NRCS
20 about destructive forces of tillage and
21 cultivation, especially the concept of tillage
22 erosion. Ask someone from EPA about soaps as

1 pesticides and read the soap salt registration
2 eligibility document and the fact sheet.

3 Ask the soil scientists about how
4 cultivation affects soil organic matter and
5 ask a certifier about how they enforce the
6 soil fertility standard and about what's
7 happening to the soil organic matter on the
8 farms they certify. Ask a hydrologist how
9 much clean, sweet water we have in the arid
10 West to give to weeds that compete with drops.
11 Ask an orchardist or a vineyard manager what
12 they most need to become or remain organic.
13 Ask David Granatstein about what happens to
14 orchard soils under plastic mulch for years,
15 and ask Carol Dawson about the challenges of
16 managing weeds by flaming.

17 Ask John Foster, Zea Sonnabend, or
18 Carmela Beck what they hear from growers in
19 and around the Salinas Valley. Ask a
20 vegetable grower how much diesel they burn
21 pulling cultivator rigs through their fields
22 and how many hours of hoeing it takes to bring

1 a leafy greens crop to market. Ask a farm
2 worker how much he or she likes hoeing weeds
3 or running a two-stroke weed eater all day.

4 Presumably, those of you all that
5 are not farmers yourselves know your organic
6 farmer. Ask your organic farmer what he or
7 she needs for weed control. Ask your organic
8 farmer how they like competing with a foreign
9 grower that can have weeds pulled or hoed for
10 a few dollars a day. And then ask yourself if
11 it's worth reconsidering this annotation.
12 Thank you very much.

13 CHAIRPERSON STONE: Very good.
14 Questions? Harold?

15 MEMBER AUSTIN: With your
16 description of what the soap material would be
17 competing with as far as the hoeing, the
18 flaming, the other, what would your opinion be
19 the impact of the inclusion of soap as an
20 allowed substance to sustainability to
21 reduction of the carbon footprint, the
22 benefits that it would bring to organic in

1 general?

2 MR. MOORE: I don't have hard data,
3 but we know that growers spend a lot of energy
4 cultivating. We know that cultivation requires
5 a lot of energy. Flaming, as I understand it,
6 is fairly propane-intensive, so it has a
7 fairly large carbon footprint. And you can
8 certainly pull a spray rig on wheels through
9 an orchard or a vineyard with a lot less
10 horsepower than you need to pull a disk or
11 harem.

12 MEMBER AUSTIN: With the research
13 that you guys have done with the material, are
14 there any perceived negative impacts that you
15 could tell us that would be of concern to all
16 of us, as organic farmers?

17 MR. MOORE: EPA loves soaps as
18 pesticides. The registration eligibility
19 evaluation from 1992, all 300 pages of it,
20 exciting reading, gets into a lot of detail
21 about why they like soaps so much. It talks
22 about environmental half lives as short as 24

1 hours, about the fact that the fatty acid
2 chain on a soap molecule is essentially food
3 to almost any living thing, and it's
4 biologically broken down very rapidly.

5 I think the only negative that
6 we've encountered so far is the fact that
7 there's a warning label on most of the
8 concentrates because of the potential for
9 temporary eye damage.

10 CHAIRPERSON STONE: Thank you very
11 much. So Harriet is up, and is Steven Shore
12 here? Steven? What about Bozena Cverckova,
13 if I'm saying it close enough? Ryan Stewart?
14 Ryan? So Michael Sligh? All right. Harriet?

15 MS. BEHAR: I am Harriet Behar with
16 MOSES, and we educate, inspire, and empower
17 farmers to thrive in a sustainable and organic
18 system of agriculture, and we envision a world
19 where all agriculture will be organic and
20 sustainable. I want to say thanks to the NOP
21 for working on the apiculture standards. I'm
22 probably one of the few people who say that.

1 And I want to also say that I support the full
2 review of other ingredients to the OFPA
3 criteria.

4 I'd also like to say, for the
5 vaccines used under excluded methods, that I
6 really would like the NOSB to expedite the
7 process in providing farmers the tools they
8 need to verify that their vaccines are not
9 GMO. This is kind of a travesty that right
10 now we have this non-compliance occurring in
11 the world of organic livestock production, so
12 I encourage you work as quickly as possible.
13 I'm concerned that the market for non-GMO
14 vaccines, that the people who make those non-
15 GMO vaccines need to know that there's a
16 market out there, and the longer we wait and
17 don't provide them with a market, that the
18 vaccines for livestock will move more and more
19 towards GMOs.

20 On antibiotics, I don't feel that
21 there has been an urgency felt by the organic
22 tree fruit community until now, that they

1 really need to be working towards finding
2 another solution. They have matured with the
3 use of these materials, unlike livestock
4 which, from the very beginning, didn't have
5 antibiotics and became, as they grew they
6 learned all those alternatives. I think that
7 -- so I support a 2016 extension, but I would
8 like there to be guidance given by the NOP
9 through their program manual to really spell
10 out all those alternatives.

11 I'd also like to make it clear
12 that our pest control hierarchy includes the
13 use of materials that, at times, there's a
14 problem that, no matter what you do in
15 practices, I support the systems-based
16 approach very strongly, but the use of
17 materials is part of that systems-based
18 approach. And so as you look at all of the
19 materials that you review, I think it's
20 important that you look at the risks involved
21 and the problems that a systems-based approach
22 might not be able to solve, and that's when

1 those materials are important.

2 Look at what's happening in
3 Europe. What they use instead is copper. And
4 so you need to be comparing materials to
5 materials when you're looking at the pest
6 control hierarchy and whether or not to put
7 things on the National List. And we all know
8 that copper is a problematic material.

9 Another thing, too, in my
10 experience, when growers leave organic
11 production, they don't tend to come back. And
12 so we don't want to lose this production. We
13 want to keep these people, whether they're in
14 organic with their soul and their heart or
15 just there for the economic benefits. We want
16 to see organic production remain in organic.
17 I believe antibiotics problematic from a
18 systems approach because they do get
19 resistant. So human health is an issue, but
20 I'm also looking at the farmer side. It's a
21 problematic material from the beginning.

22 So I just encourage you to give

1 the growers a little bit more time. I think
2 they know the urgency now, but don't, I don't
3 want to see it continually extended. Thank
4 you.

5 CHAIRPERSON STONE: Thanks,
6 Harriet. Jean?

7 MEMBER RICHARDSON: Harriet, can
8 you help me with the antibiotics in Europe,
9 the information that you have on that? You
10 said that they've obviously had the fire
11 blight problem for a long time and they've
12 been addressing it with certain forms of
13 copper. As I understand it, the present forms
14 that are being used are different from those
15 that were used in the past in terms of the
16 type of copper, and their rate of accumulation
17 is not the same as it was in earlier kinds of
18 products that were being used. Do you have
19 any sort of factual data that would help me to
20 better understand how they deal with it in
21 Europe?

22 MS. BEHAR: My understanding is

1 that the use of copper to control fire blight
2 is very heavily regulated because they've had
3 issues with copper buildup in the soil. So
4 they've started to regulate that use of the
5 copper, so that's where I see the problem. If
6 they've had to come in because it's been used
7 so heavily, just as you have with your use of
8 copper have had to, over time, make it more
9 restrictive because of the dangers of the
10 buildup, because copper is an element that is
11 not going to go anywhere. It's not going to
12 break down any further.

13 So as far a lot of data, no, but I
14 just know what the European Union is doing in
15 the control of the use of copper because
16 they've seen it to be a problem.

17 MEMBER RICHARDSON: So is copper
18 the primary way in which they're dealing with
19 fire blight in Europe, or are there other
20 products that are being used in an integrative
21 approach?

22 MS. BEHAR: I think there's an

1 integrated approach, but when things get
2 serious they come in with the big guns, which
3 is copper.

4 CHAIRPERSON STONE: Jay?

5 MEMBER FELDMAN: Thanks, Harriet.
6 You know we all love organic farmers, and
7 organic consumers are an integral piece of the
8 growth of the organic industry and the fact
9 that organic consumers dig deeper in their
10 pockets against proclamations of the safety of
11 the conventional food supply by regulators and
12 other agencies. You know that there's
13 tremendous support for organic production and
14 its growth on a consumer side, so I hope
15 that's clear. I know it's clear to you, to
16 everybody else here, as well.

17 However, you also know and have
18 followed the regulatory process for a very
19 long time. And I wonder if you could address
20 the fear that I have that extending, adding an
21 extension to an extension to an extension
22 results in another extension. And what

1 assurance can this board have that, at the end
2 of another two-year period, that we or the
3 future board will, in fact, uphold that
4 extension? Is there any evidence? Point us to
5 some evidence where that has happened in a
6 timely fashion, especially given the urgency
7 that we, at least I and some many others feel
8 about the public health threat that we're
9 facing here and the urgency associated with
10 that.

11 I'm really searching for that
12 assurance because I'm fearful that the
13 consumer community will see this as just
14 dragging its feet, government, USDA overtaken
15 by grower interest, disrespectful of consumer
16 investment in a sector of food production that
17 they have invested their families' resources
18 into. I'm fearful that we will be undermining
19 that trust and faith. So help me out here
20 with assurances that we get to an endpoint.

21 MS. BEHAR: Well, I can't make any
22 assurances that anybody will never bring

1 forward another petition in the future. But
2 as I said, I think that the National Organic
3 Program should put out guidance as soon as
4 possible, considering the centrist position
5 that NOC had put forward listing all of the
6 various systems and other materials that could
7 be used and really having that be up-front and
8 putting the growers' feet to the fire in the
9 two extra years that they are really working
10 on all those other alternatives so that it
11 shows the urgency that they need to be moving
12 forward. I don't feel that their feet have
13 been to the fire until now, and so we really
14 are going to hold them to that that, during
15 that two-year period, they are using all of
16 those tools, experimenting with all of those
17 tools, and moving towards the time when they
18 know that antibiotic is going to be gone.

19 And so that's where I feel we're
20 giving them that urgency and having that very
21 strong guidance from the NOP that not only do
22 they try one, two things that, when the

1 inspector comes, the question is, you know,
2 your spacing is very tight here when you're
3 doing new plantings, are you giving more
4 space, you know, because that's part of the
5 issue is having a very tight planting, that
6 there's not enough air circulation.

7 All of these things I don't think
8 have been pushed as hard as they could have
9 been at the certification level and have
10 really been shown to the growers that they
11 should be doing all of these things. And
12 their feet will be in the fire when they know
13 that in two years, 2016, it will be gone.

14 MEMBER FELDMAN: A quick follow-
15 up. Is there precedent for that kind of NOP
16 guidance holding feet to the fire on practices
17 and performance?

18 MS. BEHAR: Well, I mean, guidance
19 does not have the force of regulation. That's
20 understood by all. But when it's transparent
21 and out there saying this is what we are
22 telling the certifiers to do when they are

1 looking over the organic system plan, I think
2 it does give the growers more impetus to
3 follow through. Rather than just saying
4 cultural, biological, and physical controls,
5 you're actually giving them some of those
6 tools spelled out and it gives the certifiers
7 more direction in what they're looking for
8 when a producer is using the antibiotic for
9 fire blight.

10 CHAIRPERSON STONE: Nick?

11 MEMBER MARAVELL: Harriet, I know
12 you've worked with an awful lot of farmers.
13 What do you feel are the most effective ways
14 to communicate a change in practice to the
15 farming community? And do we, are we in a
16 situation now where that's possible?

17 MS. BEHAR: Well, I think, to the
18 organic farming community, there's many of
19 them who go to conferences and they get
20 newsletters. But really it's when that
21 inspector comes to the farm, and they're
22 concerned about continuing their organic

1 certification. So if they had a guidance
2 document with them when they came with the
3 National Organic Program seal on the top
4 saying have you gone through these various
5 protocols, cultural, biological, mechanical,
6 physical, I think that would really show them
7 that, whoa, here's this, it's got the NOP seal
8 on this, this is what I should be doing.

9 They all really, at this point,
10 have read the rule. But when that inspector
11 shows up or they get a direction from their
12 certifier, they all are looking at that. I
13 can't guarantee they're all reading our
14 newsletter or they're all going, you know,
15 their members of the NOP. That is not as
16 transparent as when they are having that
17 direct visit and their annual certification.
18 That's when they're paying attention.

19 CHAIRPERSON STONE: Harold?

20 MEMBER AUSTIN: Harriet, during
21 your presentation, you mentioned that part of
22 the control process would be integrated past

1 management and control practices. We received
2 a written comment that stated that integrated
3 pest management had no basis for belonging in
4 organic production program at all. What's
5 your interpretation of that? To me, it would
6 appear that the basic fundamental beliefs of
7 what organic really stands for would be that
8 integrated control process using the
9 variation, the various tools that the growers
10 typically would apply, whether it's fire
11 blight control or other. Could you explain
12 your comment and what you feel that that
13 integrated pest management approach to an
14 organic farm systems plan means to the organic
15 grower?

16 MS. BEHAR: I was referring more to
17 the, not integrated pest management but to the
18 pest control hierarchy that's in our
19 regulation, which is that you start with
20 mechanical, physical, and cultural controls.
21 When those are not effective, you move to
22 natural products, biological products. When

1 that is not effective, then you have the use
2 of the synthetics that are on the National
3 List.

4 But to say that producers only
5 have those top two tools and the last one of
6 the synthetics is not part of that hierarchy
7 is really not looking at it holistically and
8 that that last synthetic piece is part of it.
9 It is our last resort, but it is still part of
10 the whole system.

11 And so when you are reviewing
12 products, materials to put on the National
13 List, I think you need to look at the
14 effectiveness of the first two and how strong
15 is the need for that last synthetic that would
16 be the last resort. And we always want to be
17 encouraging that systems-based approach, but
18 in integrated pest management, in the
19 conventional world, really has, it doesn't
20 really fit with organic because it's mostly
21 based in the lessening of the use of toxic
22 materials, not really looking at a systems-

1 based approach for control. It's just, you
2 know, transitioning from one toxic material to
3 something less toxic.

4 MEMBER AUSTIN: But if we were to
5 apply that terminology to organic, organic
6 systems plan, and using the integrated control
7 process and starting at the control points
8 that you just laid out, wouldn't that systems
9 approach then apply, though? I mean, isn't
10 that exactly what an organic systems plan
11 really represents is we are going to start at
12 that lower level and work our way up and use
13 that synthetic material only as that last
14 resort?

15 MS. BEHAR: Correct, yes. And
16 that's why I want to have the National Organic
17 Program give a little bit more direction on
18 what those first two items in the hierarchy
19 really spell it out for people that these are
20 all the tools they should be using, not just
21 we did a little blossom thinning and it didn't
22 work or, you know, whatever it might be, we

1 monitored and we had to use it. I mean, what
2 are they doing in a long-term system in their
3 orchards to lessen the effect fire blight has?
4 Rootstocks, varieties, I mean, these are all
5 things that they should be working on,
6 including working with the consumer base to
7 accept those less problematic varieties in the
8 marketplace, too. I mean, they have responded
9 to consumer demand for the Pink Ladies and the
10 Fujis and the Galas that are, that tend to be
11 more problematic when there's fire blight.
12 But I think they should have been working and
13 need to be working on promoting those
14 varieties that don't need the use of
15 oxytetracycline.

16 CHAIRPERSON STONE: Colehour, if
17 you'll wrap this up for us.

18 MEMBER BONDERA: Yes, I'm going to
19 try to wrap it up with a very specific
20 question, but I just want a little bit more
21 information based on, I guess, mixed messages
22 that I'm getting and something that you

1 commented on, which is relating planting
2 spacing of trees to the need for antibiotics.
3 And I think, on our tour, my understanding
4 was, and it's not very deep so I need help
5 here, my understanding was that bees are the
6 way that this is moved around between the
7 trees and, therefore, to a large degree, the
8 spacing between the trees is not really a big
9 factor. But your comment suggested that you
10 think that the spacing of the trees, from a
11 systems plan, is a factor related to the need
12 for antibiotics, in some way or another. I'd
13 like you to comment further on that part of
14 what you said. Thank you.

15 MS. BEHAR: Well, that's just one
16 of the tools. And when you have that high
17 humidity environment, anything that you can do
18 to move, you know, have more airflow, I think,
19 could be one of the items in a larger toolbox
20 of things that you're doing. Pruning, you
21 know, also provides that airflow, that sort of
22 thing. You know, interspersing in the blocks,

1 you know, not having monocultures of very
2 susceptible varieties altogether. I mean,
3 there's a lot of different strategies that the
4 producers can use.

5 CHAIRPERSON STONE: Thank you,
6 Harriet. So Michael Sligh will be the last
7 presenter before lunch. We are ahead of
8 schedule. We're going to evaluate how we
9 adjust tomorrow's schedule. I'll remind the
10 Board that we were able to have a little
11 latitude today, but we may not have this
12 luxury tomorrow. But some of the folks, we're
13 in the after lunch aspect, so some of these
14 people may be getting here at lunch. So
15 that's why we'll break a little early and then
16 come back on time at one. So Michael?

17 MR. SLIGH: Good morning. I am
18 Michael Sligh with the Rural Advancement
19 Foundation International. I'm a founding
20 member of this body and also an organic farmer
21 since the 1970s. I wanted to start by, well,
22 Miles is not here, but I wanted to really

1 thank him and encourage this urgent action
2 towards sound and sensible certification.
3 This is very timely, very welcomed, and
4 looking forward to that making a big
5 difference in the paperwork burden on organic
6 farms and operations. So thank you for that,
7 and we can help with that in any way you need
8 help with.

9 On the other topic, I think that
10 we had a pre-NOSB meeting yesterday. We had
11 a very productive and high-quality
12 conversation about this issue of antibiotic
13 use in tree fruit and the conundrum that we
14 find ourselves in and how we got here. We
15 found very broad cross-sector support that we
16 should remove antibiotics out of the remaining
17 area of organic production.

18 We also recognize that it is not
19 productive to use scare tactics or distorting
20 information that would lead people to believe
21 that organic fruit is full of antibiotic
22 residue. But we also found it equally

1 damaging that no one here would really be
2 arguing for antibiotic use and would not be
3 recognizing the global implications of
4 antibiotic resistance and that that is a real
5 threat and that organic has built its brand
6 here in the United States around that
7 exclusion and around that distinction and that
8 organic livestock producers had benefitted
9 from that distinction and that we should
10 continue to be that haven where consumers can
11 find a safe and sane alternative to antibiotic
12 use in agriculture.

13 We also recognize that we all take
14 a responsibility for being in this conundrum,
15 that we have encouraged the production and
16 expansion of susceptible varieties and that
17 the marketplace has promoted them and that all
18 of us, as organic apple-eating consumers, have
19 also contributed to this conundrum we find
20 ourselves in. But at the core of this, to me,
21 is, you know, I was leading the NOSB in 1995.
22 We thought we were settling this matter with

1 a two-year extension that would be resolved in
2 1997. So there is this lack of institutional
3 memory both across administrations and across
4 NOSBs that we somehow need to embrace and
5 memorialize. And I strongly urge this board
6 to look at, when you make this decision, to
7 create a process where you reflect on the
8 lessons from this and you memorialize this
9 decision so that you're very clear about that.
10 And future boards can then refer to that
11 clarity of thought because that's part of the
12 difficulty here. I try to go back and parse
13 through that 40-page analysis that was put
14 together about the history of this subject,
15 and it's very convoluted and it's very, you
16 know, frankly, checkered.

17 And we have to be, as a board, we
18 have to be able to send the clear signal to
19 the marketplace that innovation is being
20 encouraged and give the marketplace that time
21 to create that innovation because the model of
22 organic is continued quality improvement over

1 time and that has got to be at the core of it.
2 And if that signal is confused, the market is
3 not going to respond. We're not going to come
4 up with an alternative to antibiotic if we
5 don't signal that correctly. Thank you.

6 CHAIRPERSON STONE: Thanks,
7 Michael. Questions? Jay?

8 MEMBER FELDMAN: Thanks, Michael.
9 I'm curious, given your experience with all
10 this, why you feel it's so difficult to get
11 something off the list once it's on? I mean,
12 even with this recent, relatively recent
13 decision on sodium nitrate, I would argue that
14 it wasn't because of the true analysis that
15 the Board did but more because of
16 international pressure that that was moved
17 off. So even that isn't a good example of the
18 Board removing something based on the
19 criteria, the list of criteria that we utilize
20 for review.

21 Why is it so difficult? I mean,
22 the whole concept of sunset and continuous

1 improvement, it seems hard to operationalize
2 for some reason. Why do you think that is?

3 MR. SLIGH: Well, certainly, in
4 the founding Board, it was our strong
5 understanding that the model we were using was
6 that, as we were encouraging the growth of
7 organic, we recognized there were certain
8 transitional tools or materials that we would
9 need that would -- you know, bottlenecks or
10 deficiencies in our holistic system. And so
11 the idea was that you could have something on
12 a list for a period of time, but it could come
13 off. And, in fact, much of what we voted on
14 in the original list was predicated on that
15 strong assumption that, A, annotations gave
16 you scope and clarity of use; and, secondly,
17 that those materials were not permanent
18 additions and they would come off as better
19 choices were innovated.

20 And so that's the model that this
21 was built on. And why it hasn't worked is, I
22 think is, there are multiple factors as to why

1 it hasn't worked, but one I alluded to was the
2 fact of our institutional memory and the fact
3 that the board rotates and the new board
4 coming in may not share the former board's
5 analysis. There can be new data that comes.
6 The NOP also changes staff, and they have had
7 different interpretations of this over time.
8 So that continuity of thought and clarity has
9 not persisted.

10 And then I think we have also
11 violated our own process probably several
12 times where we failed to follow the process,
13 just for many different reasons. And so, to
14 me, this concept of takings and the economic
15 impact, that was not a part of our thinking in
16 the original analysis of this, and we
17 certainly never thought about that in putting
18 it into the language of how this operated.
19 This is a new factor that has emerged in this
20 debate, and I think it's one that both the
21 Department and the NOSB needs to wrestle to
22 the ground because, indeed, if that is the

1 barrier, that's where you need to have that
2 conversation.

3 I don't want to be between you and
4 lunch.

5 CHAIRPERSON STONE: No, that's a
6 good way to send us off for lunch. Thank you.
7 So I've got about a quarter until 12. We'll
8 break now, and we'll come back promptly at one
9 and -- excuse me. Oh, did you have a
10 question? I'm sorry. Go ahead. Sorry I
11 didn't catch you.

12 MEMBER BONDERA: Thank you.
13 Sorry. I hate to interrupt a break because I
14 want one maybe as bad or worse than anybody,
15 but, Michael, I appreciate what you said and
16 I am intrigued a little bit and inspired a
17 little bit, but I'm, in my brain, thinking
18 about, when you introduced yourself, you
19 mentioned the fact that you're a farmer. And
20 I'm curious if, you know, I wrote down what
21 you said, innovation is being encouraged.

22 As a farmer, do the behaviors of

1 the NOSB or the NOP encourage innovation in
2 your activities at the practical farming scale
3 and/or -- and that doesn't have to be a yes or
4 no answer -- but and/or what could we be doing
5 realistically and in practice that would be
6 encouraging innovation? Because from my
7 perspective, it's a great idea, but I don't
8 know where to go with it. If you could, I
9 don't know, address that. Thank you.

10 MR. SLIGH: Well, I mean,
11 certainly, clarity of standards and clarity of
12 instruction helps to provide, you know, that
13 motivation to do the best practice. But I
14 think where this is broken down has been in
15 this decision-making around encouraging
16 alternative improved products to be developed.
17 If I was a German company and I had a product
18 that might be a solution to the antibiotic
19 issue here that was actually found in this
20 local area, but the message from this body was
21 ambivalent, I'm not sure I would make that
22 investment.

1 And so that's what I'm getting at
2 is that, if you want to encourage better
3 tools, this body has to be clear, you have to
4 be decisive, and you have to set goals, and
5 then you have to follow them out, because
6 every time you don't do that it just, I think
7 it throws a monkeywrench in that ability.
8 Farmers, of course, need time to adapt. I
9 mean, I'm not for taking anything away that
10 doesn't have a better replacement, but we've
11 been at this a long time and we've got to run
12 this railroad better than this.

13 CHAIRPERSON STONE: Thanks,
14 Michael.

15 MR. SLIGH: Thank you.

16 CHAIRPERSON STONE: So Urvashi
17 Rangan will be on first thing after lunch at
18 one. We'll break and return at 1:00. Thank
19 you very much.

20 (Whereupon, the above-entitled
21 matter went off the record at 11:50 a.m. and
22 resumed at 1:05 p.m.)

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(1:05 p.m.)

CHAIRPERSON STONE: If we could have the Board members take their seat, please. We want to get started for the afternoon session. We want to backtrack a little and be sure. Some of those that weren't available when their name was called - - so Urvashi is still on because we asked her to be, but is Gabriella Nunez available? I don't see a hand. What about Erik Paul? Okay. Laura Reed? These are people that were notified of being after lunch, so I'm checking that back. Judith Reedy? No. Amy Wachspress? Kathie Weinmann? Jennifer Wilcox? Okay.

With that, we'll go where we are.

MS. ARSENAULT: Tracy's here.

CHAIRPERSON STONE: Okay. Tracy is here. Okay. Jessica Zern? Okay. So we'll back up to those that we do know. So at this time, let me see who's going to be on

1 deck. One second. So Urvashi is up, and Jo
2 Ann Baumgartner is on deck. Thank you.

3 MS. RANGAN: Thank you. Good
4 afternoon, everybody. My name is Urvashi
5 Rangan. I'm head of the safety and
6 sustainability group at Consumer Reports.
7 I've been there about 15 years, and I'm a
8 scientist.

9 I'm here today to talk about, for
10 the most part, the antibiotics issue in apples
11 and pears. As you know, this has been a
12 controversial issue for the last couple of
13 years. It's something we've known about, too.
14 I spoke with you all at the last National
15 Organic Standards Board meeting in Providence.
16 This is something we don't think that comports
17 with consumer expectations of organic. It's
18 inconsistent in that it's the only product
19 that allows for antibiotics, and it really
20 doesn't comport with what consumer
21 expectations are.

22 But because we've had a lot of

1 dispute about whether it comports with their
2 expectations or not, we actually conducted a
3 poll this month of over a thousand consumers
4 online and asked them the question. And so
5 the first question we wanted to know was
6 whether consumers actually knew about this
7 practice, so the question was are antibiotics
8 used to treat disease in apple and pear trees?

9 So about 70 percent, 67.9, did not
10 know that. They just don't know that these
11 things are being used in agricultural
12 practices, other than sort of what's going on
13 in meat production. Only 15 percent knew, 17
14 percent said they did not know, and 67 percent
15 -- I'm sorry, 17 percent said, no, they are
16 not used and 67.9 percent said they didn't
17 know. So the overwhelming majority of
18 consumers actually don't know that this
19 practice is going on.

20 Then we informed the same
21 consumers who were taking the survey that this
22 was a fact, that these were being used, and so

1 should fruit from these trees be allowed to
2 have the organic label? Fifty-four percent
3 say no, thirty-five percent say they don't
4 know, and only ten percent say yes.

5 So we've got some, at least
6 statistically, significant data here showing
7 what consumer expectations are around this
8 issue. Frankly, it hasn't been transparent.
9 Consumers haven't known about it. We don't
10 talk about. We're part of that issue. We are
11 talking about it now because it needs to be
12 talked about, and it needs to be transparent
13 to consumers for as long as we are using these
14 materials. It is our position at Consumers
15 Union that we would like this oxytetracycline
16 to retire in 2014. We do not want any further
17 extensions on it.

18 So there is a failure sort of of
19 transparency, and there's also a failure of
20 sunset. And I think consumers are weary of
21 materials that are being allowed in organic
22 production. I get calls from reporters all

1 the time about it, about what materials are
2 being used, is that really appropriate, does
3 that comport with consumer expectations? And
4 the answer to these things around this issue
5 is no. And the failure of these materials to
6 sunset is a real problem in creating a real
7 incentive for organic alternatives to be
8 developed.

9 And I think we're all really
10 pleased that we are seeing the emergence of
11 these alternatives. Pamela Coleman from
12 Cornucopia can comment on even how long ago
13 these alternatives were starting to be
14 developed, but the real pressing rush didn't
15 happen until the last year or two. That's
16 because we're at year, what, seventeen or
17 eighteen of this listing on the National List.
18 So this has been a very long time, and because
19 it doesn't sunset we diminish the incentive to
20 actually create commercially-available organic
21 alternatives.

22 But perhaps the most pressing

1 issue of all are the public health concerns we
2 have around the use of antibiotics. And as a
3 scientist who runs safety and sustainability
4 at Consumer Reports, I can tell you that we,
5 as an organization, are simply against the use
6 of antibiotics in agriculture, in farming,
7 except for the treatment of sick animals.
8 And, frankly, the problem with antibiotic
9 resistance is real. There is scientific data
10 around that. Thank you.

11 CHAIRPERSON STONE: Thank you.
12 Questions? Jay?

13 MEMBER FELDMAN: Hi. Thanks for
14 coming to this important meeting. Explain a
15 little bit more about the process that you
16 use, please, to get public opinion, generally.
17 And in addition to that, if you, as an
18 organization, really chose to sort of get the
19 word out, I guess you'd call this preliminary
20 type of work you did with a thousand, a
21 targeted population, what impact do you think
22 that could have, given your preliminary

1 results?

2 MS. RANGAN: Well, we just did
3 this poll about a week ago, Jay, and we have
4 done a press release yesterday, along with
5 Food and Water Watch and Center for Food
6 Safety. We all share the same position around
7 this. We all represent consumers.

8 I think this poll, basically, was
9 conducted online. It's done by our national
10 survey center through Google Online Polls. We
11 actually have an entire survey department
12 dedicated to polling. And this is one of the
13 polls that we've done. It was these two
14 questions. It's more than a thousand
15 respondents, so it's statistically
16 significant. And it's randomized.

17 CHAIRPERSON STONE: Jean?

18 MEMBER RICHARDSON: Hi, Urvashi.

19 MS. RANGAN: Hi.

20 MEMBER RICHARDSON: So as a
21 scientist, could you point me to the direction
22 of any research which has been done which

1 measures the amount of residues of antibiotics
2 left in fruit that have been harvested?

3 MS. RANGAN: So, Jean, it's a good
4 question, and I'll start by saying our primary
5 concern with antibiotic use in these
6 situations is about the resistance and the
7 resistance that can grow and spread in the
8 environment. But residues are certainly
9 important to some consumers. Some consumers
10 don't want to buy things if they think it
11 might have residues.

12 There's no question that you can
13 get residues from the use of this, and there
14 are studies out there to show that. In fact,
15 on page 11 of your technical review from April
16 2011, the EPA 2006 source states there is a
17 high probability that oxytetracycline-
18 resistant bacteria are present in the
19 environment as a consequence of pesticidal
20 use, which may have negative consequences for
21 humans.

22 So they've acknowledged the

1 resistance. In terms of the residues, EPA set
2 a tolerance of 0.35 PPM for oxytetracycline in
3 apples and pears. They did that based on
4 field studies that they did looking at
5 residues and potential residues that may
6 result. The residue levels that they found,
7 in general, were at the limit of detection, a
8 little bit lower, but some were above that.
9 So that suggests that the scientific question
10 of can it be possible is yes. Does it happen
11 all the time? No. And we know this use is
12 somewhat intermittent, so you're not going to
13 see always a residue on there. But the fact
14 of the matter is this practice can, in fact,
15 lead to that, although, like I say, we think
16 that's a secondary issue compared to the
17 resistance problem.

18 There's also other papers out in
19 Europe, but I encourage you to go to those EPA
20 sources, read through the EPA documents for
21 how they arrived at that tolerance level for
22 tetracycline. They have actually looked at

1 the uptake in fruit.

2 MEMBER RICHARDSON: A follow-up
3 question. If it's an issue and there have
4 been alternative ways of controlling fire
5 blight in Europe, why is that we have not used
6 the European materials to control fire blight
7 in the United States?

8 MS. RANGAN: Well, I think that's
9 a really good question, and it's not that
10 we're always the same as Europe, but we began
11 in 1995 by putting these materials on the
12 list. And because we didn't retire things
13 properly like they should have been, it's now
14 almost 20 years later, and so back to the sort
15 of why don't we have these incentives created
16 for commercially-available alternatives? In
17 part, it's because the sunset system is
18 broken, and we don't retire materials when we
19 are really supposed to be retiring these
20 materials. And so we don't see these
21 developed in an adequate amount of time.

22 CHAIRPERSON STONE: Colehour?

1 MEMBER BONDERA: Yes, thank you,
2 Urvashi, for what you've shared. And I
3 actually would like a little bit more
4 information from your perspective because I
5 also am a member of the public, I also am a
6 consumer, even though I'm here representing
7 farmers, and I think the truth is I'm curious,
8 in that survey, did it go the next level of
9 asking what people were concerned about
10 related to this, if you were informed them
11 through the survey that this was a reality?
12 And I guess from a public health perspective,
13 were there questions and how those were
14 answered if they were in that? Thank you.

15 MS. RANGAN: Sure. Colehour, you
16 know, we didn't go into this survey. There
17 was really two questions, and we really wanted
18 to be very targeted about asking about
19 antibiotic use as it relates to organic apples
20 and pears because, after all, that is the very
21 sliver of the issue we are focused on here.

22 So in terms of why consumers care

1 about that, I'd like to offer at least some
2 greater perspective. And we, as an
3 organization, have a whole meat on drugs
4 campaign. We think that no animals should be
5 given antibiotics. We're pushing Trader Joe's
6 to only carry no antibiotic meat. We hold
7 Whole Foods up as a model of providing no
8 antibiotic meats to people.

9 So we think that that is one rung
10 up on the sustainability chain. We say
11 organic gets you a few more rungs up on that
12 chain. And then there's other things, like
13 animal welfare-approved when you add on to
14 that that does even more.

15 And so there's a sustainability
16 continuum. The lack of using antibiotics, at
17 this point in animal production, is now
18 considered the first step up but an incredibly
19 important one.

20 I also want to say that you're
21 going to hear from three physicians over the
22 next 24 hours who are going to speak to the

1 incredible public health threat of antibiotic
2 resistance. It's not about using little bits
3 or comparing that to a lot. Little bits of
4 antibiotic in the environment do create
5 resistance, and you're going to hear from a
6 physician that's working with us at Consumers
7 Union, Dr. Michael Crupain. You've already
8 heard in written testimony from Dr. Bob
9 Lawrence at the Johns Hopkins Center for a
10 Livable Future where Michael teaches classes
11 with him on antibiotic resistance. And you're
12 also going to hear from the Infectious Disease
13 Society from Dr. Morris tomorrow who will also
14 be speaking to this issue.

15 So the public health problems are
16 real. They're scientifically-based. We are
17 concerned about them from a public health
18 community, not just scientists but also
19 medical professionals, as well.

20 CHAIRPERSON STONE: Tracy?

21 MEMBER FAVRE: You've talked about
22 this survey a couple of times, and you

1 mentioned just a moment ago that it's a very
2 narrow sliver that you're looking at about the
3 antibiotic use in apples and pears. I'm
4 curious, I think most of us know that the
5 design of the questions used in the survey
6 have a lot to do with the response that is
7 elicited. So my question is do you believe
8 that consumers understand that, potentially,
9 with a decision to remove the antibiotics, we
10 might be looking at the loss of organic apples
11 and pears in this country so we're faced with
12 either eating conventional apples and pears or
13 getting them imported from other countries who
14 may or may not have the same stringent
15 evaluation? So do they really understand the
16 potential for that if they want to continue to
17 consume those products?

18 MS. RANGAN: Yes. We worked
19 pretty extensively with our survey department
20 to actually structure these questions in a way
21 where we could provide enough information and
22 then give them the factual information because

1 we didn't want this to be an esoteric
2 question. And so, you know, gauging whether
3 they know or not about the practice was
4 important for us because that's been the
5 subject of some debate here over the last few
6 years. Some people say consumers know about
7 it, they don't care, they're paying for it, it
8 doesn't matter.

9 But what we know from this poll
10 data is that consumers don't know. They
11 actually don't know the practice is going on.
12 So now, in a survey, once you get a response
13 like that that you don't know, then you have
14 to provide them the information of what the
15 fact is.

16 And then our next question was
17 really do you think an organic label then
18 should be used on those apples and pears? And
19 it's only ten percent that say yes. The rest
20 either don't know or more than half say no.
21 That's a pretty definitive answer.

22 And, you know, I think, from a

1 consumer point of view, why this product gets
2 antibiotics, why dairy never does, consumers
3 have come to expect that this is a practice
4 not used here. And the fact of the matter is
5 that alternatives are being developed, and
6 there are some producers who aren't using it.
7 And we think the market should reward those
8 people who can truly differentiate themselves
9 as meeting the gold standard here.

10 And the problem here is that
11 there's no way for them to do that. There's
12 absolutely no way. The organic label doesn't
13 distinguish them as actually meeting a
14 standard that they have come to expect from
15 all other organic products that they buy, and
16 that's a problem. And we think there may be
17 some market depression, but there will be a
18 supply that comes in that meets that standard.
19 That is how our market works. And we don't
20 think, by simply saying we need to keep the
21 acreage, we need to keep the subpar products
22 on the market, that that is a reason to

1 continue to do it year after year after year.
2 We're in year 17 or 18 of this listing. It is
3 time to retire it, and that's what we think
4 needs to be done. And we're really looking
5 forward to the alternatives coming onto the
6 market. And at the very least, we need to
7 have a transparent system where consumers can
8 know. And we had a really interesting
9 discussion yesterday with the folks in, I
10 believe it was Washington State University,
11 I'm sorry, Washington State Department of Ag
12 who were actually saying on the certificate
13 they are noting whether they're certifying a
14 block in an orchard, they do it by variety,
15 that didn't use antibiotics.

16 So is there a way now to start
17 differentiating? Is there a way to say, no,
18 these apples didn't get antibiotics, these
19 ones did? Because, frankly, this is where
20 consumers are completely in the dark, and
21 that's not fair, and that's not fair to the
22 market. We need full transparency here

1 because we don't want this label to be
2 undermined. And when consumers are in the
3 dark and feel sort of cheated and they learn
4 about these things, that's when the serious
5 undermining of the label actually happens from
6 a consumer confidence point of view.

7 So we think it is time to
8 recognize what those expectations are and at
9 least make it transparent to consumers and
10 provide a way for growers who are truly
11 meeting the gold standard to be able to
12 differentiate their product as that.

13 CHAIRPERSON STONE: Harold?

14 MEMBER AUSTIN: In your expert
15 opinion, in terms of the potential to induce
16 resistance in the environment, is there a
17 difference between the various antibiotics
18 that are currently being used? And if so, is
19 there an impact on where and how those are
20 used?

21 MS. RANGAN: Yes, it doesn't
22 really matter. I mean, there are a number of

1 different antibiotic classes, and they have a
2 number of antibiotics within each class.
3 Streptomycin and tetracycline are both broad-
4 spectrum, medically-important human
5 antibiotics. So as an antibiotic goes for
6 using it in agriculture, that's a pretty
7 serious decision to use a drug that is
8 critically important in human medicine.

9 Now, when bugs get resistance to
10 these things -- and, remember, you use, when
11 we treat sick people, you want to use
12 pharmacologically-relevant doses that are
13 going to kill that bacteria. When you use low
14 levels in the environment, it's like a perfect
15 recipe for creating resistance in the
16 environment. The bacteria sort of gets pinged
17 with these things, and then it learns how to
18 mutate and, essentially, resist it. And then
19 what happens is those bacteria can pass along
20 that resistance to other related bacteria.
21 They can also, in that genetic resistance
22 pattern, transfer resistance among that class

1 of antibiotic. And in some cases, in certain
2 antibiotics, you can hop classes.

3 The point is really that
4 resistance isn't contained. It isn't just
5 based on the little amount you think you might
6 be using. Once you put that resistance into
7 the environment, into a bacterial gene, you're
8 sending it through. You have a live bacteria
9 now that can, indeed, grow and spread its
10 resistance over time, not only to the fire
11 blight organisms but any of those related
12 organisms that are in the orchard. And there
13 are studies to document that.

14 CHAIRPERSON STONE: Nick?

15 MEMBER MARAVELL: Yes, Urvashi.
16 We've heard some discussion of antibiotics use
17 in livestock and then distinctions made with
18 regard to the amount and frequency of
19 antibiotics used in tree fruit. And then
20 we've heard various suggestions as to what
21 should be a phase-out date. I was wondering
22 if you could comment, just from your

1 perspective, on your distinctions between
2 livestock use and tree fruit use and your
3 sense of urgency to phase this product out,
4 specifically with regard to tree fruits?

5 MS. RANGAN: Sure. Thanks, Nick.
6 I think there's a misnomer that somehow,
7 because less antibiotics are used in apples
8 and pears compared to livestock, it is,
9 therefore, less of a problem. That simply
10 doesn't hold scientific water. The fact of
11 the matter is that wherever you put
12 antibiotics into the environment, you start to
13 create and exacerbate the resistance. I mean,
14 resistance is there, naturally. But you will
15 accelerate that resistance wherever you're
16 applying those antibiotics. These are sprayed
17 onto trees, so they're sprayed in the orchard
18 and all the bacteria, which there many of,
19 that sit in the orchard, once that antibiotic
20 hits them, that resistance can take place.
21 And then that resistance can start to spread
22 and move downstream and do all sorts of

1 things. That mechanism is in livestock
2 production, but it's not dependent on
3 livestock production. It's because, once the
4 bacteria itself is resistant, that is the
5 problem of antibiotic resistance in the
6 environment.

7 So it's not a matter of quantity
8 of antibiotic used. It's once you start to
9 actually put that into the environment, you
10 start to create the dilemma and the resistance
11 problem.

12 In terms of phase-out, because I
13 think we have had this on the list for such a
14 long time and we have testified prior to this
15 in the last round it was re-listed that this
16 was not appropriate and that it was time to
17 retire this material. And at the last re-
18 listing of this material, we were here telling
19 you the same thing, that this really has to
20 stop, this has to be the last listing. And
21 now we're here again having the same
22 discussion. And so for us and for consumers,

1 we think that the phase-out should happen in
2 2014 and that we should start moving towards
3 those alternatives.

4 In the meantime, whatever your
5 decision is, and between now and 2014, if that
6 is the date that is chosen, we want it to be
7 very transparent to consumers that this is
8 going on. And we think, frankly, if the OTA
9 and the industry is saying we all agree that
10 we want to get rid of this, take a pledge, say
11 something, take a position. You guys could
12 write a policy. Let's anchor that down
13 because consumers need to know that, as an
14 organic community, there is commitment to
15 doing away with a practice that they don't
16 want, they don't expect, that has public
17 health ramifications. And I think we need a
18 serious commitment to the closure of this use.
19 And if it's true in this room that everyone
20 agrees with that, and the question is really
21 on date, then I think that can at least begin
22 a public dialogue showing that there is true

1 commitment to end this practice.

2 CHAIRPERSON STONE: Jay, are you
3 going to wrap this up?

4 MEMBER FELDMAN: Thank you. I'm
5 trying to -- and you addressed this, in part,
6 but I'm trying to ask you to help the Board
7 understand its responsibility in this
8 balancing act. Obviously, everybody sitting
9 around the table here is concerned about
10 impacts on growers. How do we integrate the
11 concern about consumers, which is a
12 requirement, actually, of the Board, as we
13 balance and calculate this decision?

14 MS. RANGAN: Well, Jay, you know,
15 on other issues, and it's sort of a similar
16 approach, we look to you all from the public
17 as being guardians of the materials that are
18 allowed and not allowed for use in organic
19 production as a way that maintains the
20 integrity in this program. And we truly
21 believe that your goal is not to maintain
22 acreage, your goals is not to grow it as fast

1 as possible, the goal is not to approve as
2 many materials as possible at all times. The
3 goal is actually to maintain the high
4 integrity of the meaning of these standards,
5 and welcome aboard if you can meet that.

6 But the goal is not to somehow
7 create a lopsided standard that then creates
8 an exception for certain products but not for
9 other products because that is very negatively
10 perceived. And part of the goal of the
11 Organic Food Production Act was to impart
12 consistency in this label. And so
13 consistency, high integrity, and quality
14 improvements over time, that's your goal.

15 And this is a slippery slope,
16 isn't it? I mean, peaches and nectarines,
17 from what I understand, are also, in
18 conventional agriculture, use streptomycin and
19 tetracycline. They don't in organic. So I
20 don't see any organic peach and nectarine
21 growers here, but they're not allowed to use
22 it either.

1 And so, really, this is about
2 leveling the playing field. And if we don't
3 have a certain product on the market because
4 they can't get to that standard quite yet,
5 that's okay. And we're having this whole
6 debate in fish, aren't we? I mean, whether
7 it's the fish meal in the open net pins or
8 even antibiotic use in aquaculture. We're
9 going to get into that. We don't want to see
10 this slippery slope of allowing something that
11 is really incongruent with the organic program
12 and doesn't comport with consumer expectations
13 to then start bleeding into other areas, and
14 we think it is the job of this board to
15 maintain that.

16 CHAIRPERSON STONE: Thank you very
17 much.

18 MS. RANGAN: Thank you.

19 CHAIRPERSON STONE: So I let us
20 run on that one, but just remember we may not
21 have this luxury tomorrow. So, Jo Ann, you're
22 up, and Lisa Bunin is on deck.

1 MS. BAUMGARTNER: Hello. I'm Jo
2 Ann Baumgartner with the Wild Farm Alliance.
3 We're based in Watsonville, California. Thank
4 you for the opportunity to share Wild Farm
5 Alliance's comments. As you might imagine,
6 we're pleased that the NOP is pursuing the
7 development of biodiversity guidance. It
8 comes at an important time now that the NOP
9 checklist used to accredit certifiers
10 addresses the Natural Resource Conservation
11 Standard.

12 To remind you, organic operations
13 must maintain or improve the natural
14 resources, including soil, water, wetlands,
15 woodlands, and wildlife. Biodiversity
16 conservation is part of the definition of
17 organic production. It's in the preamble
18 language, and it's in the crop production
19 standard for perennial systems. Native
20 habitat supports natural enemies of crops and
21 has been estimated to be valued at \$100
22 million in a seven-state region of the U.S.

1 Moreover, habitat supports
2 pollinators, many of which are in decline. In
3 California alone, researchers have estimated
4 that wild pollinators are worth one to two
5 billion dollars and actually provide a third
6 of the pollination services for that state.

7 Soil biodiversity is critical for
8 competition, predation, and eventual die-off
9 of foodborne pathogens. Raptors and four-
10 footed predators help keep rodents in check,
11 which is not only good for yields but also
12 good for food safety. It's better to have a
13 couple of predators in the field than many
14 rodents.

15 In FDA's proposed produce safety
16 rules, they state that the presence of
17 wildlife, in and of itself, is not a food
18 safety issue. And in five areas of their
19 preamble, they say they do not require farms
20 to take measures to exclude animals or destroy
21 habitat.

22 We are happy to see that the NOP

1 is working on sound and sensible project in
2 order to make organic certification
3 accessible, attainable, and affordable. With
4 upcoming guidance on biodiversity, we propose
5 that a slate of examples are given to help
6 farmers see how they can shape biodiversity
7 conservation practices to fit their specific
8 situations in an attainable way. And with
9 help from NRCS, installing practices can be
10 affordable for farmers.

11 Wild Farm Alliance, MOSES, and
12 several other sustainable ag groups are
13 assisting NRCS to better serve organic
14 farmers, and it's starting to pay off.
15 Recently, hundreds of NRCS personnel have
16 participated in our eight webinars, and in
17 Santa Cruz County, where I'm from, the NRCS
18 conservationist says he works now with more
19 organic farmers than conventional farmers.

20 And integrity. Consumers expect
21 organic products to protect the environment.
22 One of the issues that the guidance needs to

1 cover is addressing the conversion of high-
2 value conservation lands, which could give
3 organic a black eye. So by addressing all of
4 biodiversity in the guidance, it will uphold
5 the integrity.

6 Besides guidance, what we need is
7 a concerted effort to train inspectors,
8 certifiers, and operators about biodiversity
9 conservation. Later this year, we'll begin a
10 process working with several partners in hope
11 that, once guidance is out, the NOP, too, will
12 be incorporating this critical issue in their
13 trainings. In regard to the penalty matrix,
14 we're glad that it's back under review because
15 the NOP needs to consistently address the full
16 definition of natural resources in the non-
17 compliance, not just soil and water.

18 Now, to the tetracycline used in
19 apple and pear production. It should be
20 phased out in a way that support those farmers
21 that are diligently using antibiotics
22 sparingly while fostering biodiverse vibrant

1 soils that produce healthy trees, versus those
2 who schedule sprays based on the calendar and
3 don't take a holistic approach to plant
4 nutrition. The spread of antibiotic
5 resistance is troubling. We don't understand
6 all the consequences to the environment and
7 human health.

8 Sulfuric acid. It's very toxic,
9 and it should not be allowed in organic
10 production.

11 IBA. Since we don't know what the
12 environmental effects of it are, the
13 precautionary principles should be used.
14 Finally -- okay. Thank you.

15 CHAIRPERSON STONE: Thank you, Jo
16 Ann. Questions? All right. John?

17 MEMBER FOSTER: So I thought I
18 heard you say the tetracycline and
19 streptomycin were applied on a calendar basis
20 just now. Where did that come from? Because
21 I haven't heard that up until now.

22 MS. BAUMGARTNER: Were you on the

1 tour yesterday?

2 MEMBER FOSTER: Yes.

3 MS. BAUMGARTNER: I had heard that
4 that's what one of the farmers had responded
5 when they were asked about the application.

6 MEMBER FOSTER: Well, the Board
7 can correct me if I'm wrong, but I have no
8 recollection of that.

9 CHAIRPERSON STONE: Nick?

10 MEMBER MARAVELL: Yes, I don't
11 know if you were in here, but, basically,
12 there was one orchard that was pretty much
13 practicing three applications of tetracycline,
14 on average. They could go more or less, but
15 it was not indicated that any individual year
16 would be zero and there was some skepticism
17 voiced with regard to the use of the fire
18 blight models for the exact trigger to start
19 that. That's what I heard.

20 MEMBER FOSTER: That's real
21 different than a calendar basis, to me.

22 MS. BAUMGARTNER: Okay.

1 MEMBER MARAVELL: Yes. Well, I'm
2 not defending the words "calendar basis."

3 MEMBER THICKE: But it was based
4 upon the bloom stage, per se, without the
5 model or weather conditions.

6 CHAIRPERSON STONE: Okay. Thank
7 you. Lisa Bunin is up, and Tracy Miedema is
8 on deck.

9 MS. BUNIN: Good afternoon. My
10 name is Lisa Bunin, and I'm the organic policy
11 director at the Center for Food Safety. CFS
12 oppose extending the use of tetracycline until
13 2016. A growing body of evidence demonstrates
14 the public health threat of antibiotic
15 resistance and warns of the dangers of losing
16 tetracycline considered by the World Health
17 Organization as critically important for
18 combating human infection. This is reason
19 enough to prohibit tetracycline in organic.

20 CFS supports the minority position
21 to maintain the expiration date of 2014
22 because tetracycline used for fire blight

1 control in organic apple and pear production
2 fails to meet the material review criteria.
3 What is most concerning about even low-level
4 uses of antibiotics is that their use can
5 contribute to reservoirs of resistance that
6 can spread to other bacteria and human
7 pathogens through horizontal gene transfer.

8 The Board has repeatedly warned
9 growers that antibiotics would not be allowed
10 in organic indefinitely. Growers who sell to
11 the EU have heeded this warning by finding
12 ways to successfully avoid antibiotics,
13 demonstrating that they are not essential.

14 This extension request has sparked
15 public debate about why antibiotics are used
16 in organic in the first place. Over 30,000
17 people signed CFS' petition to end
18 tetracycline use, and many are asking
19 questions about which varieties are likely to
20 be sprayed so they can avoid buying them.

21 CFS urges the NOSB to deny the
22 extension because allowing it could tarnish

1 both the organic apple and pear industry and
2 the reputation of organic. We further urge
3 the Board to state in its final decision that
4 antibiotics are incompatible with organic.

5 CFS agrees with the GMO
6 Subcommittee that clarity is needed around the
7 median words used in excluded methods, but we
8 support leaving the definition of excluded
9 methods intact. The regulatory history shows
10 that it was never intended to be rewritten
11 but, rather, it was a benchmark against which
12 new and emerging technologies would be
13 evaluated.

14 CFS believes that the term natural
15 condition and traditional breeding should not
16 be replaced. We urge the NOSB to use guidance
17 and policy statements to clarify the rule,
18 instead of regulations. And we urge the Board
19 to confirm in writing at this meeting so that
20 there's no doubt that excluded methods
21 prohibits genetically-engineered organisms and
22 processes.

1 Sugar beet production and beet
2 sugar extraction are chemically intensive and
3 environmentally destruction, and the TR makes
4 that clear. Conventionally grown sugar beets
5 use synthetic toxic fertilizers, pesticides,
6 and soil fumigants that harm the environment.
7 Sugar beets are processed with formaldehyde
8 and generate a large volume of wastewater.
9 Sugar beet seeds are treated with a
10 neonicotinoid pesticide which threatens bees,
11 beneficial pollinators, and birds. This
12 certainly is not the type of production that
13 organic should support under any
14 circumstances, particularly since viable
15 alternatives are commercially available.

16 To meet OFPA requirements,
17 conventional sugar beet seeds would have to be
18 non-GE and identity preserved. This seems
19 unlikely, particularly since 95 percent of all
20 sugar beets grown in the U.S. are genetically
21 engineered.

22 While the petitioner is based in

1 Sweden, granting the petition would open up
2 sugar beet fiber production to all companies,
3 including U.S. producers. We urge you to
4 reject the petition.

5 Transparency is the bedrock of
6 organic. Consumers buy organic food because
7 they know what's in it and how it is grown.
8 Yet for innovation to thrive in organic, some
9 limited and prescribed CBI may be necessary.
10 Some materials ingredients can never be
11 permitted in an organic system, and, for the
12 NOSB to make that determination, all materials
13 and processes must be transparently
14 scrutinized and never be claimed as CBI. CBI
15 may be warranted for protecting formulas,
16 recipes, market research, and financial data,
17 but we oppose allowing the NOSB but not the
18 public to see confidential business
19 information because it could undermine
20 transparent public participation which lies at
21 the core of regulatory development.

22 Other ingredients need to be

1 reviewed, like all other materials. And CFS
2 supports the recommendation to deny the
3 polyoxin-d zinc salt fungicide petition.
4 Thank you.

5 CHAIRPERSON STONE: Very good,
6 Lisa. Questions? Calvin?

7 MEMBER WALKER: Dr. Bunin, could
8 you share with the Board, as well as the
9 organic stakeholders, how the Center for Food
10 Safety survey was done? I did hear you
11 mention --

12 MS. BUNIN: Oh, the petition?

13 MEMBER WALKER: -- quite a large
14 number. Yes.

15 MS. BUNIN: Well, what we do is,
16 in order to get one of our action alerts, you
17 have to sign up. So you either have to go to
18 our website or sign up on a list when we're at
19 a conference. And so then you get your action
20 alert, in this case telling you about how
21 Center for Food Safety viewed the antibiotics
22 issue. You read through our position. We

1 also have a web link to the MSB website where
2 you can read the background information for
3 yourself. And then if you agree with the
4 petition, then you have to click "take
5 action." If you don't click "take action,"
6 you are not signed up on the petition. And
7 then before we submit the petition signatures
8 to the docket, we have a program that goes
9 through and sweeps to make sure that there are
10 no duplicates on our lists.

11 CHAIRPERSON STONE: Harold?

12 MEMBER AUSTIN: Could you clarify
13 for us your position on polyoxin-d zinc salt?

14 MS. BUNIN: We think that it
15 shouldn't be on the list.

16 MEMBER AUSTIN: Rational for that?

17 MS. BUNIN: Because it is a
18 fungicide, and it's toxic and it doesn't
19 belong as a material on the list.

20 CHAIRPERSON STONE: Okay. Thank
21 you, Lisa. Tracy Miedema is up, and Steve
22 Crider is on deck.

1 MS. MIEDEMA: Good afternoon,
2 everyone. Welcome to Oregon. I hope you
3 enjoy our majestic state and have a little
4 time to take in some street food while you're
5 here, maybe get up into the mountains. I am
6 here today to urge us to all look at the
7 tetracycline issue from the perspective of
8 consumers who aren't necessarily answering
9 online answering online polls.

10 My name is Tracy. I'm a mom. I
11 have three kids that are all school lunch box
12 age, and I buy an awful lot of organic apples.
13 I grew up in Washington state, a great apple
14 growing state, and it's been wonderful. And
15 a person very involved in the organic foods
16 industry for the last 15 years. I work for an
17 organic farm. To have seen organic apples
18 really become a bonafide part of the orchard
19 industry and farming.

20 So two years ago, we were in
21 Seattle, a lot of the people in this room. I
22 broke a gavel at that meeting. And I was, you

1 know, I heard a lot of information about
2 tetracycline. Some of it that was just, it
3 was just not true. And I heard Urvashi up
4 here. I heard her ask the question of are
5 there antibiotics in the apples, and I didn't
6 feel like we got a straight answer. The
7 answer is almost none and almost never, ever.

8 And here's the thing.
9 Tetracycline will go away from organic, but
10 two years is just not enough time for
11 alternatives. It's just not enough time. And
12 so the alternative to tetracycline today is
13 conventional apples.

14 I can just barely afford to keep
15 my kids in organic apples. Organic apples are
16 set to become food that only the most elite
17 consumers are allowed to eat. And moms all
18 over just won't be able to put them in lunch
19 boxes anymore. So, you know, just looking at
20 logic, two years is not enough time to do the
21 research. And let's play this through.

22 Last year was the first year that,

1 potentially, field trials could have gone.
2 And we had two years, let's just say two years
3 in a lab working on what these alternatives
4 are to combat fire blight. This spring we
5 might have got out into the orchards. We need
6 another year to get into the orchards for
7 trials, minimum. And my family has some
8 involvement in some of these alternatives,
9 works in the wood products industry, and
10 there's some amazingly promising alternatives.
11 We just don't have enough time to actually do
12 the field trials because this is a crop that
13 we get one shot a year out there to do the
14 testing.

15 So I'm really here today to just
16 urge some balanced thinking and reason around
17 this and give the researchers the time. Don't
18 take the wind out of their sails. And, you
19 know, if tetracycline were to sunset in 2014,
20 as it's set to do, you're going to see
21 orchards go back to conventional. And, you
22 know, it's going to be really disappointing,

1 and that's where they're going to stay.

2 So, you know, let's find a way,
3 let's find something that's balanced where the
4 orchardists, the consumers, and the scientists
5 can work together. And what we're heading to
6 is something that's really, that's not
7 balanced.

8 CHAIRPERSON STONE: Thank you,
9 Tracy. Questions for Tracy? I'll say I have
10 a renewed respect for those that came before
11 me that have to swing this thing around. Zea?

12 MEMBER SONNABEND: Thank you,
13 Tracy. Have you talked to other moms and
14 other consumers about the issue? And do you
15 think they're capable of understanding it and
16 tend to agree with your or not?

17 MS. MIEDEMA: You know, I manned
18 the phones and talk to organic consumers
19 everyday for about six years and realized, you
20 know, the people in this room are probably the
21 most educated people in organic on the planet.
22 It's like a brain trust in this room, and we

1 know a lot. If the study had been fielded
2 that, you know, Consumers Union, I believe,
3 fielded it, asked the same question about a
4 multitude of materials that are on the
5 National List today. There are multisyllabic.
6 They're hard to pronounce. I think we would
7 have gotten a wholesale rejection of a large
8 swatch of the National List. I think we can
9 manipulate consumers into being scared through
10 surveys like that.

11 No, Zea, I haven't gone out and
12 fielded a study. I really come at this from
13 a personal experience and as an insider that
14 knows those details and is thrilled to be able
15 to provide that kind of wholesome food.

16 And I will say one last thing,
17 which is the characterization of the sunset
18 process as a retirement process is not the
19 congressional mandate here. It's to review,
20 not to retire. And nowhere in the OFPA or in
21 the regulation does it say the list should
22 only be six inches long or X number of digits.

1 And so we're starting to promulgate that as if
2 it were true that the sunset equals
3 retirement. It's just not true.

4 So don't let that, you know,
5 vernacular start to work its way in. It will
6 cause you to think something that's not true
7 about the sunset process, which is to review
8 any new information that's come to light.

9 CHAIRPERSON STONE: Harold?

10 MEMBER AUSTIN: Tracy, thanks for
11 coming today. As a mom with kids that you
12 firmly believe in organic and what it stands
13 for, the principles, we hear and we've heard
14 ever since Seattle that some of the
15 alternatives would be to change varieties, go
16 back to those less resistant. As a consumer
17 and as a mom, what dictates the choice of the
18 fruit or the apples that you, as a consumer,
19 a mom, would buy and what would your kids
20 prefer to eat varietal wise?

21 MS. MIEDEMA: Well, you know, I
22 grew up in the sad era of the Red Delicious,

1 knocking around, pithy, mushy. I didn't even
2 know what a good apple tasted like from a
3 store, you know. There were orchards around
4 my house. I grew up here in the Pacific
5 Northwest. We canned food in the summertime,
6 and it was really, you know, it was quite
7 wonderful. However, the grocery store was not
8 a place where you found a decent apple. And
9 the same apple gets put back in the lunch box
10 the next day, just more bruised than the day
11 before, because the kids don't eat.

12 So what dictates, you know, it
13 needs to be tasty. It needs to be wholesome
14 and crunchy and all the wonderful things that
15 the apple growers have done to actually bring
16 apples back to life. And, you know, it just
17 would be a crying shame that, in this room
18 today, we could set back what's going on with
19 organic apples and the inroads that organic
20 has made and reintroduce pesticides onto
21 thousands and thousands of acres.

22 CHAIRPERSON STONE: Jean?

1 MEMBER RICHARDSON: So I'm one of
2 those consumer reps on the Board that is
3 trying to understand consumer perception and
4 concerns. So I'd like to try to understand
5 how you made your decision that you would
6 rather be feeding an apple to your kids that
7 may potentially have a detectable amount of
8 tetracycline antibiotic in it. I'm not saying
9 it does or doesn't, but it may. Balanced off
10 against the -- did you do it by balancing off
11 the risks of all the other things that are in
12 the conventional apple or pear by comparison?
13 So did you look at sort of risk versus risk
14 when you made the decision to, and came here,
15 of course, obviously, to say I'd rather stay
16 with the, for the next couple of years anyway,
17 the pear that had been treated or the apple
18 that had been treated with antibiotic?

19 MS. MIEDEMA: You know, just,
20 again, speaking as a mother, I didn't weigh
21 any of those things, Jean. I would say I'm
22 coming at it much more from the avoidance of

1 the pesticides. And I have tremendous faith
2 in organic apples and quite unquestioned the
3 notion that there is some residual
4 oxytetracycline from a blossom spray. It's
5 more likely somebody handling it, you know,
6 and not having it have been washed. A
7 pathogen from a hand would make me a lot more
8 nervous than a potential diluted
9 oxytetracycline spray six months before the
10 fruit came to market.

11 I don't know that any moms are
12 kind of thinking that way. You go in and
13 there's certain mandates now for organic
14 consumers where we've decided we're going to
15 get as much organic, we're going to buy
16 organic milk. Even if times are tight, we're
17 going to buy organic milk. We're going to buy
18 organic apples. When we can, we're going to
19 buy the meats and the breads and the other
20 groceries. But apples, you know, they're an
21 iconic organic item now. Please, let's keep
22 it here to stay.

1 CHAIRPERSON STONE: Thank you very
2 much, Tracy.

3 MS. MIEDEMA: Thank you.

4 CHAIRPERSON STONE: Next up is
5 Steve Crider with Brady Jacobson on deck.

6 MR. CRIDER: Yes, I'm Steve Crider
7 with Amy's Kitchen. We're a large organic
8 food company based in California and here in
9 Oregon. My comments today may not rise to the
10 same level of controversy as tetracycline, but
11 I'm here to speak on behalf of our company
12 with regards to silicon dioxide, which is
13 currently allowed as a synthetic under
14 205.605. And we appreciate the opportunity to
15 address the Board.

16 Extensive detail and technical
17 background have been submitted by our team in
18 our written statement regarding our concerns
19 with the commercial availability and the
20 sensory issues around silicon dioxide
21 alternatives. But we have one other issue
22 that we wish to raise in our oral comments.

1 At Amy's Kitchen, we use a large
2 amount of rice in our frozen meals, our soups,
3 in our gluten-free line. And we go to
4 extraordinary lengths to protect our product
5 quality, flavor, integrity, and safety. Our
6 brand is found nationally at all levels of
7 retail distribution.

8 Therefore, when news events occur,
9 such as the article by our friends at Consumer
10 Reports highlighting detectable levels of
11 heavy metal arsenic in the U.S. rice products,
12 we receive an enormous response from concerned
13 consumers regarding our products. What is the
14 truth of the matter? Are they safe for us to
15 eat? What risk are we taking in buying Amy's
16 foods? What steps are we taking as a company
17 to assure that the food we produce is as safe
18 as possible?

19 At Amy's, we've been investigating
20 this matter, working with others in the
21 industry, like Lundberg Family Farms, UNFI,
22 the OTA Research Group on arsenic, to better

1 understand this phenomenon and how it might
2 best be prevented or mitigated. In the course
3 of this study, it has come to our attention
4 that rice will uptake and retain detectable
5 traces of arsenic which tend to concentrate in
6 the hulls at levels at up to 1,000 parts per
7 billion. Much more study is needed on this
8 question, but it raises serious concerns for
9 us.

10 We currently use spices with
11 silicon dioxide added to keep them free-
12 flowing. This substance, though synthetic, is
13 neutral, safe, and with proven functionality.
14 It's approved for use in certified organic
15 food system plans throughout North America,
16 Europe, Japan, Asia, all of which are
17 important export markets for Amy's products.

18 We would find it extremely
19 difficult to justify substituting silicon
20 dioxide, something that we know now could add
21 incrementally to possible detectable arsenic
22 levels in our finished product. This flies in

1 the face of the expectations of our large
2 consumer base, who we hear from daily via
3 email and social media. And it places us at
4 increased risk in the marketplace. It also
5 raises serious ethical concerns within the
6 company with our production team.

7 Amy's Kitchen strongly encourages
8 the continued use of silicon dioxide as an
9 improved synthetic while further study of
10 potential alternatives are thoroughly
11 investigated and researched. As outlined in
12 our written comments, it would take Amy's
13 around three or four years for a thorough test
14 of any reformulation of a substitute product
15 for its effect on shelf life, both in storage
16 and in our finished products.

17 So we thank you for this chance to
18 comment on this substance and look forward to
19 the rest of the week with you. Thank you.

20 CHAIRPERSON STONE: Great. Thank
21 you, Steve. Questions? All right. Thank
22 you, Steve. Brady Jacobson is up, and Ib

1 Hagsten is on deck.

2 MR. JACOBSON: Hello. My name is
3 Brady Jacobson, and I am not the enemy. My
4 husband, John, and I are co-owners of Mt. Hood
5 Organic Farms, which is located in the Hood
6 River Valley of Oregon. Our area is
7 responsible for growing about 30 percent of
8 the winter pears in this country. I'm here
9 today representing the interests of the Hood
10 River Valley commercial organic growers.

11 This issue of the use of
12 antibiotics for control of fire blight is of
13 utmost importance to organic tree fruit
14 growers of apples and especially of pears.
15 There is still no acceptable substitute for
16 antibiotics for fire blight control available
17 for commercial organic growers. I know that
18 researchers are working on other biological
19 control options, but they are not thoroughly
20 tested and proven under the variable and
21 extreme conditions that kill orchards and will
22 not be ready by 2014.

1 What I do know is that there's
2 been an orchestrated campaign of fear by
3 certain seemingly well-meaning organizations
4 timed to coincide with this meeting that have
5 distorted and misrepresented this subject, and
6 this I find extremely disappointing. The
7 message has gone out and gone viral that
8 antibiotics are sprayed on the fruit and that,
9 by eating organic apples and pears, you're
10 being exposed to antibiotics. I have
11 personally responded to a number of the blogs
12 and Facebook posts, as well as to many of our
13 wholesale customers who are being barraged
14 with inquiries about this issue.

15 While I understand that the phase-
16 out of antibiotics for organic orchardists is
17 inevitable, the science of this subject is a
18 difficult one to understand. The loss of
19 tetracycline will put organic orchardists in
20 a very precarious position, both in the
21 marketplace and in the continuing existence of
22 our orchards. My hope is to convey to you,

1 the NOSB, the ones who really count in this
2 debate and who are under tremendous pressure
3 by ill-informed consumers and the media, the
4 importance of staying the course with this
5 until there's an acceptable substitute that is
6 generally agreed to be so and is tested by the
7 industry.

8 Our orchard, Mt. Hood Organic
9 Farms, was the first commercial orchard
10 certified organic in Oregon in 1989 and,
11 certainly, pre-dated the NOP. We grow eight
12 varieties of pears and 26 apples. Tree fruits
13 are a specialty crop, and orchardists receive
14 no subsidies. Profit margins are very slim,
15 which makes things all the more difficult for
16 the smaller growers. But it's the small to
17 medium-sized growers who aren't independently
18 wealthy who will be hurt the most by this ban
19 of antibiotics. It's just that in some cases,
20 in extreme fire blight conditions, when you
21 know that you don't have a good tool like
22 tetracycline, which is 85 to 90 percent

1 effective if used properly, that you stand to
2 lose parts or all of your orchard. There's
3 absolutely no fairness or common sense in this
4 approach. Also, the fact that fire blight is
5 the disease issue that is unique in its
6 circumstances and it affects a specialty crop
7 but a crop that takes many years and many
8 thousands of dollars to bring to production.

9 In 31 years, we've probably used
10 antibiotics six times and never on the whole
11 orchard because you spray according to models
12 of open bloom, temperatures, and moisture.
13 All of the orchardists that I'm representing
14 today follow this protocol of antibiotics as
15 the tool of last resort to protect the life of
16 our trees. I can't convey this message
17 strongly enough. There are no fire blight
18 resistant pears, and most of the interesting
19 and good-tasting apple cultivars are also
20 prone to fire blight. So the proposed
21 solution to planting different varieties, as
22 if it were as easy as changing your boots, is

1 no solution at all.

2 Thank you for your time and for
3 listening with an open heart and mind to a
4 passionate, long-time organic farmer and all
5 the other farmers I represent. Thank you.

6 CHAIRPERSON STONE: Thanks, Brady.
7 Jean, question?

8 MEMBER RICHARDSON: Brady, first,
9 thank you very much for visiting your farm
10 yesterday. That was really interesting.

11 MR. JACOBSON: Well, that wasn't
12 my farm, Jean.

13 MEMBER RICHARDSON: Well, all the
14 ones that we went to and you were there. We
15 really appreciated that. We learned a great
16 deal.

17 MR. JACOBSON: Thank you.

18 MEMBER RICHARDSON: In your
19 orchards, have you tried the Blossom Protect
20 that came out last year, 2012? And if you
21 haven't or if you have, will you be using it
22 or trying it this year as an alternative to

1 using the tetracycline?

2 MR. JACOBSON: Well, the Blossom
3 Protect is something that I understand you
4 need to spray multiple times. To my mind,
5 since we have had a devastating episode of
6 fire blight back when we were naive enough in
7 1990 that we did not use any antibiotics and
8 lost almost 25 percent of our pear orchard, I
9 don't think that it's worth the risk. It
10 isn't proven. And when you have had such a
11 devastating loss, you don't want to go with
12 something until it's been widely tested in
13 field trials under all circumstances.

14 And every year is not a fire
15 blight year. As I said, we've used it
16 probably six times. We wait and we watch and
17 we hope that we never have to use it. But
18 knowing that it's something that actually --
19 it's like killing your children, watching your
20 children die. I can't even tell you how
21 devastating it is to have -- it takes 12 years
22 to bring pear trees into production. Twelve

1 years. It's not like some annual row crop.
2 When you plant those trees and you watch and
3 you spend thousands of dollars and so many
4 hours of time, and then you lose those trees
5 because you don't have an adequate tool or
6 you're naive enough to think that you don't
7 have to spray something like an antibiotic.

8 I hope and pray that something
9 like Blossom Protect or some of the other
10 products that are being tested right now will
11 become an adequate substitute. But they need
12 to be tested in field trials on orchards other
13 than people that stand to lose everything.

14 CHAIRPERSON STONE: Harold?

15 MEMBER AUSTIN: Hi, Brady. Six
16 applications, six times you've used it in 31
17 years. When you get to that point in time
18 when you make that determination that you are
19 going to have to use antibiotic or something
20 for fire blight control, what criteria are you
21 using in the field to help you make that
22 determination?

1 MR. JACOBSON: Well, when we
2 started growing organically, there were no
3 Cougar Blight programs. There were no
4 computers in general usage. And so there was
5 the, you get out and you add all the degree
6 days, the highs, the lows. You look at the
7 models. Maybe you all know by now that it's
8 a combination of moisture, vectors, and
9 temperature that create the disease. And so
10 in the old days, we added the numbers, and now
11 we look to the Cougar Blight model. There are
12 weather stations throughout our valley.
13 People are fairly sophisticated now about
14 this. People are also well educated about the
15 overuse of antibiotics.

16 And so we do work with field men
17 and they do tell us, and, you know, it's like
18 the forest fire danger exactly. It goes from
19 low to moderate and then you hope that it
20 never goes to severe. If it goes to severe
21 and they're telling me it's severe, then I
22 would have to spray.

1 Fortunately, we haven't had that
2 many times. As I said, we've probably sprayed
3 six times in all of those years. So it is our
4 tool of last resort.

5 We have done anything and
6 everything that you could imagine as good
7 husbands of the soil and our farm to create
8 biodiversity, to create the kind of
9 environment in our soil that actually produces
10 natural disease-reducing antibiotics produced
11 by the soil. We hope that those bacteria are
12 not out there, and I can't imagine that the
13 usage of tetracycline that I have seen and
14 know that my fellow orchardists, the models
15 that they follow, are going to create any kind
16 of major problem to the health of the consumer
17 or the health of the environment. And I'm
18 standing here as a very longtime staunch
19 environmentalist when I say that. I've built
20 and staked my life on this so --

21 MEMBER AUSTIN: One more question.
22 You mentioned the field men.

1 MR. JACOBSON: Yes.

2 MEMBER AUSTIN: Could you explain
3 to us the role that the field man plays in
4 your operation, as far as do you receive a
5 written recommendation from the certified crop
6 consultant to make an application?

7 MR. JACOBSON: Do I get a good
8 recommendation from them? Are they people
9 that I trust?

10 MEMBER AUSTIN: Well, do you work
11 with a licensed crop consultant, and is your
12 spray program based off of a written
13 recommendation from a certified crop
14 consultant?

15 MR. JACOBSON: I don't know that
16 we actually have a certified crop consultant
17 that you may be describing in our area. The
18 field men are usually the agricultural field
19 men associated with the, they're the ones that
20 actually sell the chemicals. When we first
21 started in this business, we sought out field
22 men that could help us because nobody knew.

1 The research was not there. We had been
2 guinea pigs. We actually had the first
3 pheromone trials ever in existence, happened
4 on our farm.

5 So we've been kind of guinea pigs
6 for this. We've built up a lot of information
7 over the years. So I almost know, without
8 anybody telling me, without looking at a
9 computer model, when I'm going to need to
10 spray for fire blight.

11 So when my field man calls me up
12 and says, "I guess you know that there's a
13 severe fire blight infection happening," I
14 already know that. So there is not, to my
15 knowledge, a certified crop consultant that
16 runs around our valley.

17 CHAIRPERSON STONE: Nick?

18 MEMBER MARAVELL: Yes. We
19 appreciate you going with us yesterday on our
20 field visits. You've been at this a long time
21 and have been a pioneer in the field. Could
22 you give us just a few little details about

1 what you've discovered along the way in trying
2 to manage your orchard so that fire blight
3 would not be a devastating occurrence? And
4 where do you see, where do you see the future
5 of this going, particularly with regard to
6 pear production, which we understand is
7 different in terms of its innate ability to
8 resist the fire blight?

9 MR. JACOBSON: Well, there's all
10 these things that you balance, being an
11 orchardist. Economics is, unfortunately, a
12 really important part of that. So we've tried
13 and done a little bit of everything over the
14 years. We, at one time, had 150 acres of
15 high-density organic orchard. We took a
16 century-old farm, and, when we came, we
17 followed European models. We planted high-
18 density orchards. They were only doing it at
19 that point. There were a couple of people in
20 Washington state that were doing it. We
21 actually got bud wood from this fellow. His
22 name is Grady Auvil in Washington who

1 introduced Gala apples in this country. We
2 actually grew the first commercial Gala apples
3 in the state of Oregon. We're now taking out
4 a lot of our Gala apples because they've
5 become a commodity. It's not because they're
6 prone to fire blight. It's because they've
7 become a commodity item, and they aren't worth
8 as much money. So that's part of the reality
9 of being an orchardist. You have to make
10 money to stay alive.

11 So as beautiful as our farm is,
12 the land use laws in the state of Oregon are
13 extremely restrictive. If you live on
14 farmland, you grow farm crops. That's kind of
15 the way it works.

16 So we have gone to high-density
17 blocks on dwarfing rootstocks for a number of
18 reasons. I actually think that the airflow is
19 actually -- and we have, we're on a slope, so
20 we have a great sight. We get a lot of air
21 drainage, natural air drainage, which makes
22 us, in theory, relatively frost-free, although

1 the frost fans were going this morning, which
2 reminded me of the difficulties of being an
3 orchardist when you have one shot at a crop.
4 Fortunately, we're not yet quite in bloom.

5 But we've gone with high density
6 because that's the quickest way to actually
7 get your money back. It also reduces the
8 volume of spray that you use, and we found
9 that early on. It's also a better usage of
10 the land. We have 200 acres, and of that,
11 now, we've downsized. We have about 50 acres
12 of that of orchard, and so we have huge pools
13 of biodiversity on our property. We have
14 ponds and lakes, insectaries. I planted wild
15 flowers all throughout the property. The
16 central core of our property is all open
17 space, gardens, lawns. We also pack and ship
18 all our own fruit. So we're kind of
19 vertically integrated. We were actually
20 forced to do that because there was nobody
21 packing organic fruit. We naively came and
22 said we're here, we're going to grow

1 organically, but then nobody would pack our
2 fruit. So we actually spun off a number of
3 marketing companies. There was no
4 distribution system set up. You know, this
5 was kind of back in the beginning stages.

6 So we have gone with varieties now
7 that are more heirloom varieties. It doesn't
8 mean that they are not prone to fire blight.
9 That's the unfortunate thing. So we've gone
10 with things that I think that the consumers
11 are much more interested in, and we also sell
12 directly to the public. We wholesale. We're
13 big enough that we wholesale and always have.
14 But we also go to farmers' markets. We have
15 people come directly to our farm to buy our
16 fruit. We have worked at all the major
17 markets sampling apples and pears. We have
18 our finger on the pulse of the consumers.

19 So as I said, we now have eight
20 varieties of pears. We have 26 varieties of
21 apples that we've planted. For labor shortage
22 reasons, for ease of picking, and for reduced

1 spray volume, for light penetration, and for
2 the fact that there are no true dwarfing
3 rootstocks for pears, so it takes a long time,
4 a much longer time for pears to come to
5 production than it does for apples. Apples
6 are more precocious on the dwarfing rootstocks
7 and maybe it takes five years before you can
8 start to pick some fruit for sale.

9 Pears is a different story. But
10 with apples still you have to imagine that it
11 takes a long time to not only grow them, to
12 pay yourself back. If you're talking about
13 starting to introduce varieties into the
14 public sphere for consumers, it takes years
15 and years and millions of dollars, campaigns
16 to actually make consumers want to buy certain
17 items. But from my knowledge, the consumers
18 really love what we grow. And we have Cox's
19 Orange Pippin, Ashmead's Kernel, Newtown
20 Pippin, these are ancient varieties, as well
21 as we have Swiss Gourmets, Rubinettes. We
22 have Honey Crisp. We have some Galas. We

1 have Jonagolds. I could go on and on. Sierra
2 Beauties. I mean, 26 varieties. That would
3 test my 65-year-old brain to have to tell you
4 those.

5 But economics is really important
6 and working with the consumer and giving them
7 what they want is really important, as well.

8 CHAIRPERSON STONE: Jay?

9 MEMBER FELDMAN: Hi. Thanks again
10 for joining us yesterday.

11 MR. JACOBSON: You're welcome.

12 MEMBER FELDMAN: You know, we saw
13 a snapshot yesterday of different growers and
14 practices, perhaps. I'm wondering if you felt
15 we saw the range of variability in terms of
16 management practices that go on or did we see
17 some outliers, or how would you characterize
18 what we experienced yesterday in terms of
19 typical practices?

20 MR. JACOBSON: Well, I'm glad you
21 asked that. And I have to be really careful
22 as to how I answer that. I was not contacted

1 about that tour. I had no idea that that was
2 going to happen until two days before the
3 tour. And I was actually gone for three
4 weeks. I don't think anybody tried to contact
5 me.

6 But when I found out where you all
7 were going, I kind of looked askance at that
8 because I did not think at all that that was
9 representative of our industry. So one of the
10 growers actually, he was certified the year
11 after we were, so he's a longtime grower, as
12 well. But you'll notice that he had about
13 five acres of pears left. They decided, they
14 were struggling to make a living as a pear
15 grower, and they took their orchard out and
16 they planted wine grapes. So that's one of
17 the -- it's almost like that voice doesn't get
18 to be counted because the trees are standard
19 trees. They're old trees, and there's only
20 five acres of them. And I don't think that
21 that's what we're talking about when we're
22 talking about somebody that actually makes

1 their living as a pear or apple grower.

2 And the third person on the tour,
3 the third group on the tour was a conventional
4 orchard. And I think that our extension
5 agent, who is not particularly well-versed in
6 anything to do with organics, who actually set
7 the tour up or was one of the people that set
8 the tour up, thought maybe that that was a
9 good idea to take you there because that
10 particular orchard, and they have 700 acres of
11 conventional orchard, and, of that, 20 acres
12 are organic. They have had a history of
13 problems with fire blight, and I think, in his
14 mind, he was thinking, well, I should show
15 them what the reality of what fire blight can
16 do. And it is true. They've been devastated
17 by fire blight, and it can do that. The same
18 year that they lost a lot of trees to fire
19 blight was the same year that we lost 25
20 percent of our pears to fire blight. And the
21 world's experts in fire blight convened at our
22 orchards, both of our orchards, talking about

1 the subject, trying to get more information
2 about the subject.

3 But what I knew that you were
4 going to pick up on and I already heard that
5 asked was that they said that they had a spray
6 program, that they use antibiotics as part of
7 a spray program. And you notice that their
8 spray person that was talking had been
9 spraying, he had been their guy for 40 years.

10 So I don't think that they come
11 from my perspective of being organic growers.
12 They are conventional growers that were trying
13 it organically and had been disappointed
14 because it's so very challenging. And that
15 part, I guess, I wish you would pick up on
16 that it is very challenging. And he said they
17 had, as part of their regular program -- I
18 don't know any other truly dedicated organic
19 orchardists that include that as part of their
20 regular preventative program.

21 CHAIRPERSON STONE: Thank you very
22 much for your time and your input.

1 MR. JACOBSON: You're welcome.

2 Thank you for having me.

3 CHAIRPERSON STONE: Ib Hagsten is
4 up. While Ib is coming up, is Angie Crawford
5 here? Anthony Kritikos? Diane Brighton?
6 Lisa Stoke? Stoke? Stoke? I got the Lisa
7 part. Dave Murphy? Okay. Ib?

8 MR. HAGSTEN: Thank you. Good
9 afternoon. My name is Dr. Ib Hagsten. I'm an
10 independent organic inspector and chair of the
11 IOIA Board. IOIA means International Organic
12 Inspectors Association. During the dialogue
13 about sound and sensible organic
14 certification, we have seen NOP focus on
15 improving communication, and thank you, Miles,
16 for coming to our annual meeting.

17 The ACA is focused on reducing
18 paperwork, and we are pleased to learn of some
19 of the changes that are being done by the
20 people behind me. During the focus on making
21 certification simpler for the client and the
22 certifier, there is little mention of

1 meaningful life for organic inspectors. Let
2 me remind us that the organic inspector is the
3 only onsite, on-the-ground, eyes and ears and
4 nose for the certifier and for the entire
5 verification process.

6 NOP oversees the organic program.
7 The NOSB makes recommendations to the NOP.
8 And while I'm here, I want to thank each of
9 you for the often thankless job you do as an
10 NOSB Board member.

11 The ACA manages the organic client
12 certification, and the organic inspector is
13 expected to visit the operation, observe,
14 verify, collect, and summarize in the shortest
15 possible time. In recent years, inspectors
16 have tooled up to meet new NOP needs, like
17 pasture rule verification, dry matter intake
18 calculations, food safety verification,
19 enhanced mass balance calculations, animal
20 welfare assessments, and now pesticide
21 sampling. Dialogue among inspectors in
22 reference to Sound and Sensible, often we

1 heard moans relative to the issues that bother
2 well-trained seasoned inspectors who have
3 uniform IOIA training coupled with ample
4 commonsense. Let me share two examples.

5 An inspector sits at a kitchen
6 table to dialogue the review letter. Three of
7 the six minor non-compliance issues are
8 referenced to a missing tag or invoice that
9 happens to apply to three sections in the OSP.
10 When we allow one missing paper to result in
11 three non-compliances, the farmer gives up,
12 while the inspector is embarrassed on behalf
13 of the ACA.

14 Example two. The inspector opens
15 his clipboard to look at a farm map prior to
16 the farm walk-around. The farmer says,
17 "That's a two-year-old map. I sent a new one
18 this spring." Now we're scrambling. How can
19 we be sure we work off the same page?

20 In summary, please do not forget
21 to consider your inspectors, your on-the-
22 ground eyes, ears, and nose, when you try to

1 make organic certification sound and sensible.
2 IOIA-trained inspectors are capable of seeing,
3 hearing, interpreting, evaluating, assessing
4 the OSP, the farm, the livestock, the fields,
5 and the direct and indirect answers and cues
6 received from the operator. However, when the
7 paperwork gets too cumbersome, one, the farmer
8 gives up, and, two, the inspector becomes a
9 paper pusher rather than what was intended: an
10 inspector.

11 Thank you for your consideration
12 of the IOIA inspectors. Thank you.

13 CHAIRPERSON STONE: Thank you, Ib.
14 I have a question. So in the vein of sound
15 and sensible, apparently many inspectors use
16 the checklist type of inspection form that
17 somewhat mimics OSP sort of generically. How
18 can inspectors using technology, if you do
19 inspecting as you describe it, visual, that if
20 the inspector sees it, it's the same as seeing
21 it and checking it on a list, so how can we
22 reduce paperwork but ensure, use your skills

1 as an inspector and convey that back to the
2 certifier?

3 MR. HAGSTEN: Obviously, we have
4 to write it down. We have to say it. He or
5 she said the following; we can state that. We
6 can write right on the paperwork. And, again,
7 we can say we saw things, we heard things, but
8 just to spend lots of time checking C tags or
9 those type of things. Some of that is work
10 that is just way too tedious that doesn't
11 really serve very much of a purpose.

12 And, of course, we need to get out
13 and walk around before we start looking at
14 paperwork. How can we verify what the person
15 is doing if we haven't seen the place? Forty-
16 five minutes in a pickup truck with a guy, go
17 out and checking the fence and checking the
18 fields and digging the heels in the dirt, it's
19 amazing how much you know about him and his
20 operation versus trying to sit at a kitchen
21 table and just flip pages and think that you
22 know what's going on.

1 It's a good question, Mac.

2 Thanks.

3 CHAIRPERSON STONE: All right.

4 Thank you very much. Thanks for your time and
5 attention and being here today.

6 MR. HAGSTEN: Thanks.

7 CHAIRPERSON STONE: So I think
8 with -- Zea, I'll get you a little warning
9 that we're ahead of schedule. My
10 recommendation would be is if we can take a
11 break now. If you need a few minutes to
12 prepare for the Materials Committee, yes or
13 are we ready to go? So what we have is we're
14 about an hour and a half ahead, even though
15 we're in two and a half hours into public
16 comment time. So let us run a little long.
17 We had some great resources at the podium.

18 So if we work through the
19 materials in the GMO Committees, as are
20 scheduled this afternoon, then I want to
21 double back and make sure that some of these
22 folks were delayed or got here that were

1 scheduled for sometime during today. We'll
2 run back through the list and be sure that if
3 anybody had opportunity that they're here, and
4 we'll get them back up to the podium, as they
5 were scheduled.

6 So, Zea, can you -- ready, or do
7 you want to take a break to get ready? Okay,
8 okay. Well, let's take a 15-minute break.
9 I've got 5:30, but, actually, it's 2:30. So
10 we'll come back at 2:45.

11 (Whereupon, the above-entitled
12 matter went off the record at 2:27 p.m. and
13 resumed at 2:47 p.m.)

14 CHAIRPERSON STONE: Board members,
15 we're going to go back in session. We're
16 taking up the materials. We are ahead of
17 schedule, so we still want to respect that
18 some of those that may have emailed a
19 scheduled time may have planned their schedule
20 very tightly around that. So we want to honor
21 those, and we'll double back and check, even
22 some of those that have scheduled to speak for

1 materials or GMO. So if we get a little bit
2 out of order, we certainly want to get the
3 feedback from those that are planning to give
4 it to us.

5 So at this time, I'll turn the
6 microphone over to Zea Sonnabend, the chair of
7 the Materials Committee.

8 MEMBER SONNABEND: Thank you, Mac.
9 Okay. We have three things we're going to
10 discuss today. We have the confidential
11 business information and petitions, the
12 limited scope technical reviews, and the
13 definition of production aids. So, first, Jay
14 will talk about the production aids discussion
15 document. We just need a logistical second
16 here.

17 MEMBER FELDMAN: Thank you, all.
18 Okay. And thank you for everybody that
19 commented on this discussion document. I'm
20 going to walk you through a PowerPoint here
21 that gives you some of the justification for
22 this, the legal basis for pursuing this issue.

1 And then, at the end, I'll summarize the kinds
2 of comments we got. Obviously, being a
3 discussion document, we will take all this
4 information under advisement, and we will make
5 a determination as to whether we need to do
6 anything. And if so, we will come back to the
7 Board and the community with a proposal.

8 Okay. The basis for this and the
9 definition of this as an issue stems from OFPA
10 Section 6517(c)(1)(B)(I), which allows
11 substances to be added to the National List.
12 And as everybody knows, there are categories
13 of substances, the last one being the section
14 there in bold that says "and production aids,
15 including netting, tree wraps and seals, and
16 set traps to keep barriers, row crops, and
17 equipment cleansers."

18 So the question is what is,
19 because that's a list of, perhaps, examples,
20 that is a list, and what is the definition?
21 So the next slide is what is a production aid?

22 The examples in OFPA suggest that

1 production aids are meant to include materials
2 that have a minimal impact on food, soil, or
3 the ecosystem. A bit of history here. In
4 2005, the NOSB recommended a much broader
5 interpretation that was referred to the NOP
6 for legal interpretation, and nothing has
7 happened since then really.

8 In 2005, the recommendation read
9 as follows "carriers, stabilizers, adjuvants,
10 fillers, extractants, excipients, solvents,
11 that do have an active function in the
12 formulations of farm production aids, such as
13 fertilizers, soil amendments, compost,
14 inoculents, sanitizers, aquatic plant
15 extracts, and fish emulsions, and active
16 substances used in pest control, disease,
17 weed, insects, nematodes, that do not fit into
18 other OFPA categories."

19 So I think we agree pretty much in
20 the Materials Subcommittee that there is a
21 need for clarity in the NOSB practice. Only
22 one substance, microcrystalline cheesewax for

1 use in log-grown mushroom production, is
2 listed as a production aid on the National
3 List. However, several items listed as crop
4 or livestock impacts inputs on the National
5 List do not fit into any of the OFPA category,
6 and some recommendations for these materials
7 refer to them as production aids. And, in
8 fact, many of the petitions that are passed
9 from the NOP onto the NOSB for review are
10 identified as production aids.

11 So on this document, we received
12 four comments. Wolf DiMatteo and Associates
13 said that it does not support continued work
14 on such a definition. NOC said, National
15 Organic Coalition said the terms should be
16 strictly limited to physical items with
17 minimal direct interaction with crops and
18 livestock, as well as chemical substances that
19 are used on equipment but not directly on
20 crops or livestock.

21 And then we received comments from
22 Cornucopia and Beyond Pesticides that said

1 production aids include physical items used in
2 production but not leaving any residues in the
3 aquatic or terrestrial ecosystem and chemical
4 substances used on equipment but not used on
5 crops or livestock. And it also, these two
6 groups also said production aids do not
7 include any substances taken up by plants,
8 chemical substances dispersed into soil,
9 water, air, or plant surfaces.

10 So there you have it. We didn't
11 get a lot of comments, but I think I captured
12 them all. Thank you.

13 MEMBER SONNABEND: Thank you, Jay.
14 So next we'll take up the confidential
15 business information and petitions. This was
16 also a discussion document, and I was the lead
17 person on this. As we stated, this was
18 brought before you because the procedure that
19 we have now has not really served either the
20 petitioner or the NOSB particularly well, and
21 it's also been cumbersome for the Department.

22 The petitioners usually don't

1 realize what happens to their confidential
2 information or what doesn't happen. And
3 before I was appointed to this board, I found
4 myself in the awkward position of talking to
5 petitioners many times and being the one to
6 tell them that the NOSB themselves hadn't seen
7 their confidential information, which they had
8 just assumed that people would see it before
9 making their decisions.

10 Furthermore, we've been in
11 dialogue with Lisa Brines from the Department
12 who handles the petition process, and she
13 informs us that many people don't even
14 understand the instructions. And so it
15 results in petitions having to be sent back
16 and forth a number of times until they can get
17 the correct format for the confidential
18 business information and address all of the
19 issues that are actually in the guidelines.

20 So we thought, well, we want to
21 start reforming this process. And we realized
22 that, in fact, as Miles mentioned this

1 morning, that, indeed, the whole petition
2 guidelines and associated parts of the policy
3 manual that govern how petitions are accepted
4 and reviewed and TRs happen probably needs to
5 be revised, and you will see that on our work
6 plan when we get to the last day.

7 So we had put out a proposal, we
8 had worked on a proposal. To make it clear to
9 people in each subset of stakeholders in this,
10 petitioners, the USDA and the TR contractors,
11 the NOSB and the public, all are very clear
12 about what happens, what can be kept
13 confidential and what happens to anything
14 confidential once you submit it. And that
15 ended up in our discussion document as
16 possible recommendation two.

17 Shortly before we were finalizing
18 this, the Department came to us and said,
19 well, why accept CBI at all? And we had, up
20 until that point, just assumed that there was
21 some reason why CBI had to be accepted, but we
22 didn't really know what it was. And so we

1 thought, well, we might as well ask the public
2 if they, what they think about that. And so
3 that turned out into possible recommendation
4 one, and this turned into a discussion
5 document rather than a recommendation.

6 So we received ten comments on
7 this specifically. Unfortunately, almost none
8 of them were from people who actually had
9 petitioned anything. In a few cases, they
10 were groups who had helped support petitions
11 for things, but especially not crop input
12 petitioners. We didn't hear from any of them.

13 We did, however, have some good
14 insight from the comments into what people
15 would like to see. And I think everyone
16 believed that this is needed. I think that
17 was universal, which was our first question:
18 is there a need to -- oh, let me scroll down
19 here. Well, is there a need to refine the
20 process? That wasn't our first question, but
21 everyone agreed that this is valuable to work
22 on.

1 People disagreed about whether CBI
2 should be prohibited categorically or not.
3 But everyone agreed, as is already the case
4 but not so clearly spelled out, that the
5 actual ingredient that may be contained within
6 a petitioned item cannot be held confidential.
7 So there's no such thing as confidential main
8 ingredients, other ingredients, et cetera.
9 The only thing that's confidential at the
10 moment is inerts when they're used with a main
11 ingredient that may be petitioned. And as you
12 all know, we are planning to start the review
13 of inert ingredients. But those are,
14 generally, not submitted with the petitioned
15 item directly.

16 So there was, the main differences
17 in the comments submitted included whether
18 manufacturing processes could be held as
19 confidential or not. And some of the groups
20 think, you know, most of the groups
21 understood, and commenters, understood the
22 reality that a lot of times your manufacturing

1 process is what's proprietary and not just the
2 formula, which, of course, we would expect
3 could be kept proprietary, but the steps and
4 what order those steps occur might be
5 confidential. And they have the right to this
6 under the trade secrets law, but, in many
7 cases, it doesn't serve us very well if we're
8 trying to make a decision on whether something
9 is synthetic or non-synthetic, agricultural or
10 non-agricultural, and which section of the
11 National List it belongs in.

12 We've also received a number of
13 petitions which had significant CBI in the
14 question about human health effects, and many
15 petitioners, many commenters commented that
16 this should never be allowed. You know, I,
17 personally, when I look at a petition that has
18 that, I will then look to a TR to see if
19 there's public information that would come in
20 about that that would not make the petitioner
21 have to disclosure. But, further, if it's
22 clearly a petition that probably isn't going

1 anywhere anyway, I'm less inclined to send it
2 back for more work of the petitioner on the
3 human health if there's really other things in
4 the petition that make it clear I would vote
5 against it in the first place. And we will
6 see at least one petition on our agenda in the
7 future that that was the case.

8 So on the issue of whether there
9 could be an affidavit that would alleviate the
10 need for absolutely full disclosure, we had
11 mixed reactions, although nobody was violently
12 against it and the certifiers tended to be the
13 most supportive because they're used to
14 dealing with affidavits in the context of
15 excluded methods and other situations in
16 reviewing certifications. And so the main
17 comment we got on that was the wording had to
18 be really tight so that the affidavit could
19 really mean something because there's no point
20 having a meaningless affidavit.

21 So, you know, people recognize
22 that, some people recognize that, even if they

1 don't like it, they could see situations in
2 which confidential information is appropriate.
3 Recipes and formulas is the main one, but,
4 perhaps things like market research data, if
5 a company paid for their own market research
6 and doesn't really want it confidential, or
7 things that directly relate to financial
8 matters of a business are appropriate things
9 for CBI.

10 And then we received a comment
11 from OTA to make sure that the policy would
12 not be applied retroactively to when we adopt
13 it, and I'm sure that will be the case when we
14 do it. It will be only going forward and not
15 backwards.

16 So we received good input, and we
17 are going to take it back to our subcommittee
18 and work further on CBI. And you will be
19 seeing a recommendation from us probably at
20 the next meeting. So thank you.

21 Next, Jay is up again to discuss
22 limited scope TRs.

1 MEMBER FELDMAN: Okay. Thank you,
2 Zea. This policy we actually propose as a
3 policy. I think we're going to, for purposes
4 of this meeting, turn this into a discussion
5 document and take back the comments we
6 received and consider reissuing this as a
7 proposal for the next meeting. But I'd like
8 to walk everybody through it just so you know
9 our perspective on this and why we thought we
10 should propose a policy at this time.

11 The current policy on TRs is in
12 the Policy and Procedures Manual, and it
13 allows flexibility in topics, questions
14 considered in a technical review. The NOSB
15 committee assigned for the review must decide
16 whether there's sufficient information to
17 petition. The committee can reasonably
18 research any pending technical information or
19 there is the need to secure a technical review
20 from a third-party expert, and that's where we
21 get the TRs.

22 In addition, when requesting the

1 assistance of a third-party expert to evaluate
2 a material, a committee must identify the main
3 technical review issues needed to be
4 addressed, including but not limited to all
5 uses of the petition material, all uses beyond
6 what the petitioner has requested, all uses of
7 the petition material in combination with
8 other materials that have already been
9 approved, interactions of the petition
10 material not addressed by the petitioner, all
11 possible manufacturing methods for a petition
12 material, potential effects on public health
13 and biodiversity, environmental risks, and
14 hazards including but not limited to. This is
15 our checklist, essentially.

16 So the purpose of this proposal
17 goes like this: since the three criteria of
18 environmental and health effects, essentiality
19 and compatibility, so it's environmental
20 health effects, essentiality and compatibility
21 with organic production practices, all must be
22 met in order for the material to be listed.

1 A full technical review is unnecessary if
2 certain threshold issues are not met. Should
3 those threshold issues not be met,
4 considerable resources of time and money could
5 be saved by conducting a first-stage TR that
6 would be allowed by, that would be followed by
7 a complete TR.

8 Now, you know, this was really
9 viewed, at least initially when we put this
10 together, as something that would create
11 efficiencies and reduce costs associated with
12 these rather expensive technical reviews. The
13 process applies in those cases in which the
14 NOP's review of the petition is unable to
15 assign the substance petitioned for a crop or
16 livestock use to an OFPA category and when the
17 material comes to the NOSB because of a
18 question of its synthetic/non-synthetic
19 classification.

20 So the proposal was to incorporate
21 into the manual, the PPM, basically, a
22 procedure in which, before requesting a

1 complete TR, the reviewing subcommittee would
2 receive a more limited review that would
3 answer the questions below, and we put three
4 questions there that would be answered. And
5 the following checklist questions there,
6 number one, two, and three: what categories in
7 OFPA does the substance fall under; number
8 two, describe the most prevalent processes
9 used to manufacture or formulate the processes
10 or the petition substance; number three, is
11 the substance synthetic?

12 And we sort of had unanimous
13 agreement on moving this forward. But then we
14 received ten comments, which suggested we had
15 more work to do on this. So total supporting
16 proposal was four. This is from the public
17 comments. And total opposing the proposal was
18 six. But it's interesting, of all of them,
19 there seemed to be an underlying support for
20 doing something to streamline the process.
21 MOSA supports the proposal as a sound and
22 sensible approach to moderating technical

1 review work. We agree that checking threshold
2 issues ahead of a more complete technical
3 review is a wise use of time and technical
4 resources. Beyond Pesticides, National
5 Organic Coalition, Cornucopia supported the
6 proposal but thought there was some clarity
7 needed. And OTA said, "While we agree with
8 the intent of the proposal and we believe
9 there may be instances where a limited scope
10 technical review would be useful, we believe
11 the proposal, as written, is too prescriptive
12 and is unnecessary at this time. We
13 respectfully request that this proposal be
14 withdrawn." We always do what OTA asks us to
15 do, so we've withdrawn the proposal. No,
16 seriously, we agree with that.

17 And then CCOF said, "We agree with
18 the concept behind this proposal in that some
19 petitioned items do not need to have a full TR
20 for the subcommittee to decide on a course of
21 action. However, the whole petition and TR
22 process in the Policy and Procedures Manual

1 should be rewritten," which is basically what
2 we're going to do when we bring this back to
3 the subcommittee, "with a step-by-step process
4 with the roles of the NOP and NOSB clearly
5 spelled out in the initial assessment of each
6 petition."

7 Now, I should note -- that's the
8 last slide -- that NOP, I hope I'm
9 representing this accurately, believes that we
10 already have this authority, that we can ask
11 the contractor to do a limited TR based on the
12 subcommittee's request. And we will do that.
13 We have done that, actually, in the Crops
14 Subcommittee already. This was really an
15 attempt to codify that process, to put it in
16 our PPM, and to affirm it. So we will do that
17 and bring it back to you all, hopefully, next
18 time as a proposal again. Thank you.

19 MEMBER SONNABEND: And that's the
20 end of the Materials Subcommittee presentation
21 today.

22 CHAIRPERSON STONE: Do any of the

1 Board members want to comment or question on
2 either of those? Okay.

3 MEMBER FOSTER: It just occurred
4 to me last night when I was thinking about
5 this on the production aids one, kind of the
6 broad description or potential definition of
7 what constitutes a processing aid. And this
8 gets to a question I've wondered for a long
9 time. Where does PVC pipe fit in? Where does
10 hoses fit in, plastic trays for transplants
11 things? And as I was reading those
12 definitions, there's a fair amount of latitude
13 there. And what I would not like to see is
14 needing to petition plastic trays for
15 transplants and hoses and greenhouse film and
16 aluminum or steel or rebar or things that do
17 have contact in a variety of, you know,
18 situations. Historically, like stainless
19 steel, well, it's synthetic. I just want to
20 kind of get that into the discussion at some
21 point because I don't want the definition to
22 be so broad that it immobilizes us as farmers

1 and handlers and livestock producers. That's
2 all.

3 MEMBER FELDMAN: Well, the broader
4 the definition, the more materials we can let
5 in. So it is a category, as you know, in
6 OFPA, so the question is does it need to be
7 constrained in any way and, if so, how, you
8 know, so that the Board has the authority to
9 review these materials in that category and
10 knows the sort of range of materials that fit
11 into that category or types of materials or
12 types of interactions with soil and food. So
13 that's what we are struggling with. And, you
14 know, I really do hope if there's more input
15 out there in the community that we could
16 receive that as we take this back to the
17 subcommittee because we really didn't get,
18 like your comment just now, I mean, we need
19 that kind of comment as a part of this
20 discussion. We didn't get a lot of it.

21 CHAIRPERSON STONE: Any other
22 thoughts around any of those material

1 discussion documents? Okay. Jennifer, a
2 little heads up, depending on if these people
3 are here before they're allotted time, you may
4 start getting ready. Signing up for the
5 materials public comment, we have Carol
6 Boutard. Is Carol here? Craig Baker? And
7 we'll come back at this, at their official
8 scheduled time in case they're local and just
9 dropped the kids off at soccer and they're on
10 their way here. Christine Hall? Anthony
11 Boutard? Peggy Miars? I see Peggy. And
12 Darryl Williams? I saw him here earlier.
13 Yes, you're on deck, Darryl.

14 MS. MIARS: Good afternoon. I'm
15 Peggy Miars, executive director of OMRI, the
16 Organic Materials Review Institute. My brief
17 and non-controversial comments today address
18 the proposal for limited scope technical
19 reports, or TRs. And, Jay, I think you must
20 have missed OMRI's comments in your summary,
21 so I'll highlight them here.

22 We do agree with the intent of the

1 proposal to allow for limited or reduced scope
2 TRs, and we agree that a recommendation is
3 unnecessary at this time. OMRI currently has
4 a contract with the USDA that authorizes our
5 organization to bid on TRs, as requested, and
6 it does include the fact that TRs may be
7 limited in scope, including initial assessment
8 reports and supplemental reports, as needed.

9 In addition, the categories in the
10 evaluation question number one of the proposal
11 seem to only address crop and livestock
12 materials, and the Handling Subcommittee may
13 have other questions for limited scope TRs for
14 handling materials. And we do agree that the
15 proposal should be withdrawn until a more
16 comprehensive proposal can be drafted that
17 possibly includes the other issues that are
18 being discussed, such as review of other
19 ingredients and whether to require
20 confidential business information in
21 petitions.

22 And on the topic of production

1 aids, since OMRI wasn't mentioned, I want to
2 mention that OMRI did submit comments that
3 included the definitions that we use for both
4 crop and livestock products for production
5 aids. In general, OMRI considers production
6 aids to be substances, rather than devices.
7 And, therefore, we limit the scope of review
8 for production aids to be those that are
9 generally meant to be applied directly to or
10 come into contact with either directly or
11 indirectly with organic crops, soil, animals,
12 and food. And you can read our written
13 comments for the specific definitions that we
14 provided.

15 And that's it. And in my
16 remaining time, I want to invite everyone to
17 our reception tomorrow night hosted by OMRI
18 OTA, organically-grown company, and Oregon
19 Tilth. And we're going to start at 5:30 with
20 organic apple and pear tasting so that we can
21 all taste the fruits that have been discussed
22 today, and we'll have more information on that

1 tomorrow. Thank you.

2 CHAIRPERSON STONE: Thank you,
3 Peggy. Question, Jay?

4 MEMBER FELDMAN: Apologies for
5 leaving you guys out. I remember reading
6 those. I don't know how that got left out.
7 I really apologize. And so we will take those
8 comments back and look at them. I guess I'm
9 trying to figure out, because we do, as a
10 board, have a Policy and Procedures Manual and
11 it does address technical reviews, and, in
12 fact, your contract with NOP should reflect
13 our board policy, to some extent, since it's
14 a materials issue and sort of how we go about
15 the process of conducting materials review.
16 Is there a problem in memorializing that in
17 our PPM?

18 MS. MIARS: No, there's not a
19 problem with it. In fact, I think that the
20 NOSB and the NOP should work together to
21 include that information. I'm just saying
22 that the specifics in the proposal are not the

1 same as what's in the contract.

2 MEMBER FELDMAN: Okay.

3 MS. MIARS: So you've got more
4 detailed and prescriptive information than
5 what we provided.

6 MEMBER FELDMAN: Right. But do
7 the details in the proposal preclude you
8 carrying out the contract, as you've agreed
9 to, with NOP?

10 MS. MIARS: If it was changed to
11 reflect the proposal? I'd have to go back and
12 look because our proposal -- well, we haven't
13 been awarded a TR at this point. So if we
14 were and if our proposal was based on the
15 information that we had at the time, it might
16 be different based on if we had to put in more
17 hours to answer more questions and do more
18 research and that sort of thing.

19 MEMBER FELDMAN: Right. Since you
20 mentioned that, do you, knowing what you know
21 at this point, do you think that a two-part
22 contract, a two-part process, say two stages

1 of a process where a committee might ask for
2 a determination or a recommendation or
3 interpretation of synthetic/non-synthetic
4 classification of material assessment, and
5 then you come back with that assessment to the
6 subcommittee and the subcommittee says, well,
7 because it was determined synthetic, we need
8 now a full TR, do you think that will be in
9 the aggregate, a more expensive final document
10 than if we were to do it in one full shot?

11 MS. MIARS: I would say that it
12 might be slightly more expensive but probably
13 not too much more. As you can imagine, it's
14 easier to do the work all at once, rather than
15 putting it aside and then two months later
16 pick it up and have to work on it again.

17 MEMBER FELDMAN: Yes, that was my
18 only question. Okay, thank you.

19 CHAIRPERSON STONE: Okay. Other
20 questions for Peggy while we have her? All
21 right. Thank you very much. Appreciate
22 offering the reception tomorrow night. Darryl

1 is up.

2 MR. WILLIAMS: Good afternoon.
3 Darryl Williams with Oregon Tilth. You're
4 invited to our reception tomorrow too. So
5 some of my comments, a couple of them are
6 materials based, others are for the NOP and
7 calculating organic percentages.

8 So the limited scope technical
9 reviews, we concur with OTA and OMRI on the
10 proposal for the process for limited scope
11 technical reviews.

12 Other ingredients. It's been said
13 that evaluating other ingredients individually
14 will make less work for the NOSB. We do not
15 agree with this statement, as all of the other
16 ingredients accompanying the material on the
17 National List would need to be evaluated one
18 by one separate from the material in question.
19 This makes more technical reviews and more
20 recommendations for the NOSB to accomplish.

21 The NOSB can evaluate the other
22 ingredients while looking at the general

1 material, which allows a well-rounded decision
2 to be made without revisiting the original
3 materials' technical review and recommendation
4 the other ingredients reside in. The other
5 ingredients in a material may very well reside
6 and be needed in multiple materials on the
7 National List. So every time a material is
8 added to the National List or reevaluated, the
9 annotation for the other ingredient would need
10 to be changed. This seems to be an arduous
11 task and may not be feasible.

12 The annotation can hold
13 information as other materials on the National
14 List do to show the allowance of carriers,
15 solvents, preservatives, et cetera, or a list
16 of allowed other ingredients could be listed
17 in the technical review or other location for
18 reference.

19 Labeling of dietary supplements
20 and body care products. In the marketplace,
21 you can find many organic claims on body care
22 and dietary supplements that are not certified

1 and, thus, not produced according to the Act.
2 The lack of scrutiny in the organic labeling
3 of these types of products has been
4 substantiated by the preamble former NOP
5 guidance and various articles. However, it
6 seems as though the ones under scrutiny are
7 the businesses that are certified, as
8 certifiers are looking carefully at the
9 labeling claims in their facilities.

10 Recently, we were told by the NOP
11 that products of these types can make organic
12 claims, but the organic claim may not modify
13 an agricultural ingredient. So organic
14 multivitamin is okay, where organic
15 multivitamin with herbs is not allowed as a
16 claim because of the word "herbs."

17 As an organic certifier, we see
18 the way the NOP is looking at these products,
19 but our concern is that not all certifiers
20 have heard this the same way from the NOP.
21 Because of this, we are asking for guidance
22 from the NOP for labeling of dietary

1 supplements and personal care products. We
2 see this as not only a way to align
3 certifiers, but it will also alleviate unfair
4 advantages for uncertified manufacturers, as
5 well as increase market surveillance for non-
6 compliant labeling in the marketplace.

7 We understand that the NOP and the
8 NOSB are currently undertaking numerous
9 guidance documents and has to prioritize the
10 need for each. But we hope that this becomes
11 a priority in the near future.

12 Calculating percentages. Oregon
13 Tilth provided comments on the topic for
14 calculating the percent organic in multi-
15 ingredient products. Please see our comments
16 for details about the necessary changes or
17 clarifications to that document.

18 Aside from the proposal, we would
19 like to see water be counted towards the
20 organic percentage in ingredients other than
21 those in the FDA standards of identity when
22 they can be supported by sound science. The

1 FDA standards of identity is a stagnant list
2 in a world of ever-growing ingredients for use
3 in many types of organic products. We see
4 that handlers are utilizing dehydration and
5 concentration of ingredients to save in the
6 transportation costs, ethics behind carbon
7 footprint, and, most importantly, food safety.
8 I have more but --

9 CHAIRPERSON STONE: Thanks,
10 Darryl. Is there questions for Darryl? I've
11 got one. Describe how, and I'm going to the
12 other ingredients topic here, describe how the
13 certifier cross-references currently if other
14 ingredients within a National List item, how
15 that verify that that item is compliant or
16 not.

17 MR. WILLIAMS: Well, some TRs have
18 listed the other ingredients that were looked
19 at. Other ones don't. So the way Oregon
20 Tilth looks at it is that these other
21 ingredients were looked upon by the NOSB when
22 that material was petitioned. Of course,

1 those other ingredients have to have a
2 technical or functional effect in that
3 material you're looking at, and they can't
4 have any technical or functional effect in the
5 product they're going into. So we, basically,
6 allow the other ingredients as long as they
7 have a technical or functional effect, and we
8 do look at the TRs to make sure that, you
9 know, to see if there were some that were
10 recommended along with it.

11 CHAIRPERSON STONE: So if you saw
12 a product X was in the TR for a given
13 substance, do you then extrapolate that it
14 must be okay in some different application,
15 some different product?

16 MR. WILLIAMS: So you're saying
17 that if I see an other ingredient in a TR for
18 one material, would I expect it to be okay in
19 another? No, I wouldn't be able to
20 extrapolate that.

21 CHAIRPERSON STONE: Jay?

22 MEMBER FELDMAN: How often do you

1 not see a TR address other ingredients, or do
2 you see them consistently addressing other
3 ingredients?

4 MR. WILLIAMS: It varies. I
5 couldn't really say, I mean, with all the
6 technical reports out there, how many do and
7 how many don't. I could say, you know, maybe
8 half and half, I could guess. You know, it's
9 really hard to say. I see a material, and
10 then I evaluate it, and I look at those to see
11 if there was anything mentioned in there.

12 MEMBER FELDMAN: And you may have
13 already said this, but if you don't find it in
14 the technical review, then what's the process
15 from there?

16 MR. WILLIAMS: Again, that it has
17 a technical or functional effect in that
18 material and that it doesn't in the finished
19 good.

20 MEMBER FELDMAN: Okay.

21 CHAIRPERSON STONE: Jean?

22 MEMBER RICHARDSON: Back to the

1 calculating percentage organic comments, could
2 you expand on the comments that you were
3 making there verbally and that are also in
4 your written materials with regards to
5 extracts, hydrosols, flavors, and the water-
6 related issues in standards of identity?

7 MR. WILLIAMS: Sure. That one has
8 been a really difficult one to figure out.
9 Like I said, the standards of identity are
10 very slim in the FDA standards, and a lot of
11 them don't have what natural water occurred
12 prior to the process to make the ingredient
13 that has the standard of identity for.
14 Currently, it's been interesting to try and
15 evaluate an extract or a hydrosol to figure
16 out what the organic, the contributing organic
17 percent would be of that. It's extremely
18 hard, and we've looked at -- so we do
19 certification for NSF-305, cosmetic and body
20 care. And they actually do have calculations
21 for different fresh extracts, you know, an oil
22 extracted from a fresh herb or a dried. And

1 even those are, they're hard to take in as
2 accurate. You can end up with these
3 calculations with a negative contributing
4 factor depending on a scenario.

5 And I've been starting to do more
6 and more research with other certifiers to see
7 what a sound approach is to an extract. I've
8 even talked to a body care professional that
9 said in some of these extracts you could even
10 consider tea an extract and that the
11 contributing organic percent would be less
12 than ten percent. So it's difficult. It's
13 something that we're trying to figure out a
14 sound approach to on extracts.

15 Fortunately, we don't see a lot of
16 them going into other products where we have
17 to pull out the water because the organic
18 contribution of all the other ingredients is
19 way more than the non-organic. So a non-
20 organic may be in there at one percent, where
21 you don't need to question that water content.
22 You could just say that that qualifies as

1 organic.

2 So we haven't gotten ourselves
3 into any situation where we wondered whether
4 or not that calculation was correct. But I
5 can see it coming in the future.

6 MEMBER RICHARDSON: Thanks. That
7 was very helpful.

8 CHAIRPERSON STONE: Colehour? All
9 right. Thanks, Darryl.

10 MR. WILLIAMS: Thank you.

11 CHAIRPERSON STONE: Okay. Again,
12 we'll double back to make sure that anyone's
13 name that wasn't here when we called their
14 name for the entire day, we'll check at the
15 end of the program here. So with that, Ms.
16 Jennifer will begin the GMO Ad Hoc Committee
17 Subcommittee discussion.

18 MEMBER FELDMAN: Mac, I have a
19 question.

20 CHAIRPERSON STONE: Jay?

21 MEMBER FELDMAN: Are we going to
22 discuss some of these proposals we'll be

1 voting on? I'm trying to figure out when
2 that's going to happen on the, like other
3 ingredients, for instance.

4 CHAIRPERSON STONE: Yes, during
5 the Handling Committee.

6 MEMBER FELDMAN: Okay.

7 CHAIRPERSON STONE: We just got
8 opportunity --

9 MEMBER FELDMAN: Okay. So he was
10 commenting, right. Sorry.

11 CHAIRPERSON STONE: Yes.

12 MEMBER TAYLOR: Okay. Thank you,
13 Mac. And good afternoon. I'd like to start
14 with a slide about the mission of the GMO Ad
15 Hoc Subcommittee, please. Thank you. The
16 National Organic Standards Board believes that
17 genetically-modified organisms must be kept
18 out of organic food and accepts responsibility
19 for making recommendations on policies that
20 can strengthen the rule's approach to excluded
21 methods.

22 The NOSB GMO Ad Hoc Subcommittee

1 will undertake examination of all the areas
2 where GMO contamination poses a threat to
3 organics and will attempt to provide
4 leadership in clarifying what excluded methods
5 actually are and how compliance to the
6 provisions of the rule can be monitored. So
7 we've received hundreds of comments from our
8 public and organic consumer communities that
9 address growing concerns for GMO contamination
10 in their produce in their fields that affect
11 and impact the food system and the need to
12 keep a high organic standard.

13 Organic stakeholders are concerned
14 about keeping genetically-modified organisms
15 out of organic livestock feed, crops, and
16 foods. These are some of the comments that we
17 have collected from your comments.

18 Please do not allow the
19 introduction, by contamination or otherwise,
20 of organics by genetically-modified organisms
21 and seeds. Maintaining the trust of the
22 public and the integrity of the organic

1 standards is imperative.

2 Please keep our food safe. There
3 is no reason to allow synthetic chemicals or
4 genetically-modified organisms into the
5 growing or processing of organic food
6 production. I count on the certified organic
7 label on the food I eat. I, along with many
8 millions of humans, depend on organic food for
9 our health and well being.

10 Preserving food planting and
11 organic methods of integrity is of utmost
12 importance to me personally, as well as
13 protecting my private land from negative
14 invasive techniques used by neighboring farms.
15 Thank you for reading this.

16 Another comment. Keep GMOs out of
17 organic food. The USDA is responsible for
18 contamination prevention. Organic farmers and
19 the NOSB and the Program must hold USDA
20 accountable.

21 Consumers choose to buy certified
22 organic food because they want to support

1 systems of production that protect and enhance
2 human health and the environment. They also
3 expect their organic food to be grown without
4 the use of antibiotics, growth hormones,
5 genetically-engineered organisms, and
6 synthetic herbicides and pesticides.

7 Preventing contamination of organic crops by
8 genetically-engineered organisms is important
9 to maintain the organic integrity.

10 Other comments. Harmful
11 synthetics and GMOs must stay out of organic
12 foods. We are on the verge of a very serious
13 food crisis if we don't act now. Please
14 listen to your voting public. You are our
15 voice.

16 The hardworking members of the GMO
17 Ad Hoc Subcommittee include the list that you
18 have there. And we have before the public two
19 discussion documents, one on dealing with
20 excluded methods terminology and Zea Sonnabend
21 will provide the discussion and summary of
22 public comments, and then we have another

1 document that has been revamped, so to speak,
2 and we've received additional comments on GMOs
3 and seed purity. It's also a discussion
4 document, and Colehour and Jay Feldman will
5 provide a summary of the comments that we have
6 received in regard to those documents. Thank
7 you, Colehour.

8 MEMBER BONDERA: Okay. Thank you,
9 all. So at the last meeting, we had put forth
10 a discussion document on GMOs and seed purity.
11 And we decided to extend that opportunity for
12 additional public comment on this same
13 discussion document. It's still as a
14 discussion document but looking for more
15 suggestions from -- sorry -- what did we say?
16 Sorry. I'm a little bit distracted there.
17 From seed and crop producers, ideally, to
18 carry forth with this.

19 So I don't really, like I just was
20 suggesting, it's not a brand new process. I
21 don't want to take you through too much of the
22 details, but I'll still quickly go through the

1 eight discussion questions that are in this
2 discussion document that we did put forth.
3 The first one is, essentially, is there a need
4 to establish a seed purity standard? What's
5 currently known about the contamination from
6 GMO contamination? What testing methods are
7 appropriate? How would some of the
8 possibilities that we had put forth in the
9 discussion document affect your farmer
10 business? Is some of the suggestions that we
11 put forth, you know, do you have better ideas
12 or options? What's known about sampling,
13 testing, and detection levels to be able to
14 implement such a standard? What training,
15 guidance, or resources do certifiers need to
16 verify compliance for such a standard? And
17 also what could organic seed producer do to
18 safeguard against GMO contamination? So
19 that's, very briefly, the different questions
20 that are in the discussion part of the
21 discussion document that we put forth.

22 So, yes, like I said, we extended

1 the deadline. So let me figure out how to
2 make this carry on for me. There it is.

3 Let me just quickly mention what
4 had happened in the previous public comment
5 very briefly. I would say, generally
6 speaking, like was said at the last meeting,
7 there was general support received in
8 response. And it is perceived as a piece of
9 the whole process to protect organic from GE
10 contamination. In other words, if, you know,
11 the seeds are a critical component of that.

12 I think that I realized a few
13 minutes ago that, from my perspective at
14 least, this is a subcategory, to some degree,
15 and I think I sort of suggest that there, of
16 the concept or definition or explanation of
17 excluded methods in OFPA, which is the topic
18 that Zea is going to be addressing. So at
19 some level, this is, because I think it's
20 related directly to that need for an update of
21 excluded methods, which is, generally, what
22 people said. Really, to consider the other

1 pieces of the picture, since many organic
2 producers, as we all can and should be aware,
3 and, you know, it's not exclusively true but
4 it's true, are using conventional seed in
5 organic production.

6 So, quickly, I'll just talk about
7 the highlights, in my opinion anyway, my
8 review with help from Jay, of what has come
9 from the written comments that we have
10 received. And I'm not going to quote and cite
11 a lot of details, but I think it's,
12 nonetheless, important to go through it. And
13 some of them are just generally taken,
14 essentially, do not make organic seed less
15 available is a concern that came up several
16 different places in a couple of different ways
17 but I think is very important for people to be
18 cognizant of the fact that would testing mean
19 that there's less organic seed available or
20 would this process constrain that? And I
21 think that that's important.

22 But I think, like I already said,

1 generally speaking, testing is needed, is
2 really, in summary, what people said. But
3 several people commented on a slow phase-in of
4 what's already happening in terms of systems
5 for looking at seed is important.

6 We put in the discussion document
7 the -- yes, I'm not ready to review it, but we
8 did put forth this zero in 3,000, yes, it's
9 item number seven in our discussion points,
10 seed sample, and we did get one public comment
11 on corn seed that went into that, and that's
12 important, I think, as one approach. I think
13 that several people, several comments refer to
14 the co-existence issue, and I think it's worth
15 noting Mark Lipson has been working with AC
16 21. AC 21's mandate is to look at co-
17 existence, which, you know, seeds is part of
18 that. And I think that it comes to that
19 concept of working together, but it comes to,
20 you know, how to get there. And I think that
21 co-existence of conventional and GMO
22 production relates directly to the opportunity

1 to have seed that isn't GMO contaminated. I
2 think that that's a significant and important
3 issue, and I think Mark has been participating
4 in our discussions within this subcommittee on
5 this topic, and I think we will continue
6 working with and trying to move that forward.

7 I think I realize right now, and I
8 think in my last point it sort of referred to,
9 but I think that in this point, as well. You
10 know, some of the commentary suggests, and one
11 of the comments, and I'm not looking at it so
12 I'm not going to cite it specifically, refer
13 to the concept that the USDA really should be
14 gathering and reporting ongoing data,
15 including sources of contamination and things
16 like GE production sites must be a matter of
17 record where contamination trends are mapped
18 and really things like that technical support
19 should be given for remediation. And I think
20 my point is putting it back to the USDA to
21 enforce containment but also that the NOSB and
22 the NOP can and should be holding the USDA

1 accountable, and organic farmers, holding the
2 USDA accountable to ensure that, not
3 specifically or necessarily, but this relates
4 to the co-existence topic, that it's possible
5 to have organic seed.

6 And I think that that's my final
7 sort of point, and then I'll get to the final
8 point on there very briefly, which is I think
9 it starts out with, I think our discussion
10 document starts out with the concept of how
11 can we go about this or how can we pursue
12 this, and I think that that's sort of where
13 we're at right now. And I think from the
14 public comments that have come, and I was
15 happy that there have been some, and, in my
16 preliminary look through our oral testimony,
17 there was going to be even more people at
18 least including in their subject areas the
19 seed purity topic, I think that people are
20 definitely interested. I think that what
21 we've seen is that we need more information on
22 next options so that, as a subcommittee, we

1 can really take this information and figure
2 out how to pursue either further research
3 communications, maybe do a study. I think my
4 personal general sense and from discussing it
5 with the Subcommittee, it doesn't seem like
6 we're going to be coming up with a
7 recommendation prior to seeking more
8 information, but I really think what I put
9 there of adding it to the NOSB's research
10 priorities is necessary.

11 And I think, at this point in
12 time, if other Subcommittee members,
13 especially Jay, if anybody has anything to add
14 to what I've shared, I think that that would
15 be fine. But I do personally look forward to,
16 you know, any oral testimony at this meeting
17 that we get on this topic. I think it will
18 help guide our direction, so thank you.

19 MEMBER TAYLOR: Zea? Thank you.

20 MEMBER SONNABEND: Thank you,
21 Jennifer. Well, as Jennifer provided in the
22 introduction to the GMO Subcommittee, Ad Hoc

1 Subcommittee, consumers are united in not
2 wanting any GMOs in their organic food. And
3 as one of the commenters that she quoted
4 stated, we are their voice and it's our
5 obligation to help keep the GMOs out of
6 organic food. So in trying to think
7 strategically about how we do that, we have to
8 deal with the areas that we can do something
9 about and try to raise the level of visibility
10 of these issues and keep putting pressure on
11 the powers that are imposing GMO dominance
12 onto the world and try to resist them to be
13 able to keep organics free of GMOs.

14 So for all of those positive
15 consumer comments who recognize this, and we
16 very much appreciate the reinforcement, there
17 are a few who commented about things that we
18 can't really do anything about. Much as I
19 think we universally would support labeling of
20 GMOs on conventional food, we can't really do
21 anything about that. That's a state-by-state
22 issue, and we will support them in our own

1 states, as we see fit. And we feel that
2 organic food already does not contain GMOs,
3 and that's more of our responsibility to try
4 and keep GMOs out.

5 We also are accused by some
6 commenters of the ulterior motive of trying to
7 sneak them in without their knowledge. And
8 believe me, while I can be as paranoid as the
9 next person, but I really hope that we're all
10 on the same page here and we are not trying to
11 sneak them in by opening up these subjects,
12 some of which are very complicated, for
13 discussion. We're trying to air them out, air
14 out the issues with a goal of strengthening
15 keeping GMOs out of organic food.

16 So, that being said, we proposed a
17 very complicated and ambitious topic, and that
18 was is the term "excluded methods," which is
19 used for genetic engineering in the rule,
20 really sufficient as a definition? Our paper
21 is fairly complicated. It analyzes the actual
22 words of the definition word-by-word and

1 phrase-by-phrase. Then it suggests a number
2 of other possible terms that may or may not
3 belong in the definition. It takes no stand
4 either way on whether something should be or
5 shouldn't be in the definition but asks the
6 public for their input on what should and
7 shouldn't be in the definition.

8 It also takes no stand on how
9 we're going to achieve a new definition. We
10 did not specifically say that we are going to
11 open up the rule and actually change the
12 definition in the rule. We didn't
13 specifically say we were going to have
14 guidance or some interpretation of it through
15 guidance or any other format. All of that is
16 still a ways away, and we will be looking at
17 all of our options in the future.

18 So, you know, I hope those of you
19 who objected to the whole idea based on the
20 fact that it was opening the rule understand
21 that that isn't necessarily the outcome of
22 this, and we do, we expect this will be a

1 long-term project until we come to this stage
2 of a recommendation about this.

3 So we asked several questions of
4 our public about what they thought of what we
5 had put forth. We got more questions back
6 then we got answers to those questions, and we
7 got a lot more questions back. And they were
8 really good questions, and they were sort of
9 all over the place, which is why I haven't
10 tried to summarize them with slides.

11 But suffice it to say that we
12 appreciate very much that some of you turned
13 in articles with your comments that brought up
14 more terms that we hadn't considered. We got
15 lots of good information about what other
16 countries are doing. A group in Switzerland
17 talked about their situation in Europe, which
18 was very helpful to us, as well as we heard
19 from Canadian stakeholders and others
20 concerned with international equivalency on
21 this issue.

22 So I'm not going to be, you know,

1 highlight specific comments like we've done in
2 many of the other presentations here but just
3 say that we are going to thoroughly digest
4 each and every one of them and we will come
5 back in the future with probably a few more
6 discussion documents before we come to a
7 recommendation on this subject.

8 Also, later today or, not today,
9 later in the meeting, you will hear that we're
10 hopefully finally ready to pass a
11 recommendation about public communication.

12 The public communication document is designed
13 so that we can have an open docket year-round
14 so people can provide input, not just in the
15 three to four weeks before each meeting. And
16 we're hoping that that is going to be able to
17 be used two ways so that, because, really, for
18 a document as complicated as this excluded
19 methods document, we should have been able to
20 have it up for six months to get comments from
21 everyone. And so we're hoping, in the future,
22 we can have a long-term document that can

1 really have a chance to get out there and get
2 comments in for a long enough period so that
3 everybody can properly review it.

4 So that's what we're anticipating.
5 And we expect a lot more work on this issue to
6 come. Thank you.

7 MEMBER TAYLOR: Thank you, Zea.
8 Mac?

9 CHAIRPERSON STONE: All right.
10 Thanks, Jennifer. We have, I believe, 11
11 people signed up to comment as part of the GMO
12 Committee. First up is John Tanzi. John is
13 available. And, again, we're a little ahead
14 of schedule, so we'll double back if we have
15 the opportunity. Kelci Bynum? Laura Batcha,
16 I know you're here. Dag Falck, I know you're
17 here. Dag is on deck.

18 MS. BATCHA: Hi and thanks. I'm
19 Laura Batcha with the Organic Trade
20 Association. I serve as a vice president of
21 the Trade Association, and I serve on two
22 federal advisory committees that are relevant

1 to some of the areas I'm going to comment on.
2 One is the AC 21 that advises the Secretary of
3 Agriculture on issues related to co-existence.
4 And then the second is the Agricultural Policy
5 Advisory Committee, which is an international
6 trade advisory committee to the Secretary of
7 Agriculture and the U.S. Trade Representative.

8 I have signed up to primarily talk
9 about the seed purity document, but I just
10 wanted to clarify a couple of things that I'm
11 hearing about the difference between the use
12 of alternatives in the European Union versus
13 the U.S. in terms of practices and
14 alternatives and antibiotics. So I'll just
15 quickly address that and then move on.

16 I think, primarily, the difference
17 is to keep in mind that what we're talking
18 about for alternative protocols that are under
19 research here is a combination of a yeast
20 product and a copper product. In the case of
21 what the trials are looking at, it's the
22 Blossom Protect and the Previsto.

1 In the United States, the Blossom
2 Protect was first tested in `08, registered
3 with the EPA in 2012. So it was not available
4 for growers to use until 2012. The copper
5 product, the Provista, which is a 3-percent
6 copper solution versus the more widely
7 available copper product that's a 50-percent
8 solution, is not yet registered with the EPA.
9 We expect that that process could be completed
10 in 2013. It could get kicked out further.

11 So one of the primary differences
12 between the way U.S. orchardists and European
13 orchardists have been able to manage this is
14 that they have had these tools available to
15 them to use, the yeast product and copper
16 products, in the management of fire blight.
17 To date, the alternatives that are under
18 research have not been available to U.S.
19 growers, so it's not just as simple as the
20 fact that they're used to antibiotics and that
21 was they've just grown up with them and so
22 they like to use them. The tools we're

1 talking about and the research have been
2 available in the European Union and they
3 haven't been available here.

4 And I think the only other thing
5 that I'll note about that is that keep in mind
6 the European Union standards for copper
7 applications are a little bit different than
8 they are here. They typically will use that
9 higher solution of copper, the 50 percent, and
10 the requirements in the EU for restrictions on
11 copper have to do with kilograms applied per
12 hectare per year that you cannot exceed over
13 an annual basis in terms of application. They
14 do not have the restrictions that we have
15 around accumulation in soil and requirements
16 to test for copper accumulation.

17 And then, lastly, in the European
18 Union, the standards allow for the member
19 states to issue derogations or what are
20 temporary variances on that restriction. So
21 you only have to hit that load rate on copper
22 of kilograms per hectare on average over a

1 five-year period. And we've heard about fire
2 blight coming in cycles, so you could actually
3 use all of it in one year in a bad fire blight
4 year and still meet the requirements in the EU
5 standard.

6 So I just think there's a little
7 bit of difference in terms of what is allowed
8 and not allowed in the standards that may
9 provide a little bit more color to the
10 difference in how those practices have
11 developed.

12 So the first thing I want to do,
13 as I change gears, is to do a shout-out to
14 NOP. We just completed our consumer survey
15 for the fifth year in a row, and this is the
16 first year that we have seen a statistically
17 significant increase in the consumers' trust
18 in the organic seal. So a ten-percent
19 increase over where we've been tracking as a
20 flat line historically, where we'd see 32
21 percent of parents report in that top box that
22 they had high trust that if it was labeled

1 organic it was organic. We saw that jump by
2 ten percentage points in the last 12 months,
3 and so I think that that's important as we
4 take a step back because you guys do all the
5 hard work on the leading edge of continuous
6 improvement where you're challenging the
7 things that need to be pushed forward.

8 So if anybody wants to ask me
9 about seed purity, please do.

10 CHAIRPERSON STONE: Well, that was
11 one way to time it good with the light but not
12 -- I think Terry still gets the prize on that.
13 Zea?

14 MEMBER SONNABEND: I'm going to go
15 a little bit beyond seed purity, but this
16 might enter into it. What I'd like to hear
17 is, from your AC 21 perspective, how our work
18 can best support your work on AC 21 and
19 whether that might include seed purity issues
20 at all.

21 MS. BATCHA: Thanks, Zea. I think
22 if you all are not familiar with the final

1 recommendations from the AC 21 to the
2 Secretary, they were, in large measure,
3 disappointing. It was a tough debate in terms
4 of stakeholders that represented organic and
5 identity preserved agriculture. We had about
6 5 of 22 seats on the committee, so it was a
7 very tough discussion in terms of getting our
8 point across about fair, equitable solutions
9 to prevent gene flow and contamination.

10 There were a few highlights in the
11 recommendations that were delivered to the
12 Secretary that called for USDA to engage in
13 data collection about the state of genetic
14 purity of the seed stock as a whole and also
15 a request for seed providers to give data to
16 USDA about the contamination levels of their
17 non-genetically-modified seed that they're
18 selling into the marketplace.

19 So there's a piece in the AC 21
20 recommendation that could further this
21 discussion if that data is actually collected.
22 I like the idea that Colehour suggested about

1 adding that to the NOSB research priorities
2 because I think that could signal to the
3 Secretary that the NOSB agrees that that data
4 collection is critical in terms of getting the
5 conversation off the ground. So I think I
6 would fully support that.

7 One of the challenges that we
8 faced over and over again in the discussions
9 at AC 21 was, no matter how we presented the
10 information, the response we got was, well, it
11 doesn't matter in the organic standards how
12 much GMO contamination you have in terms of
13 your certificate, there are no consequences.
14 Therefore, we are not taking seriously your
15 communication to us that there are economic
16 consequences of contamination.

17 So I share that because that's
18 what we heard repeatedly. So I think you saw
19 it in some of the public comments from other
20 groups. I think, in fact, ASTA weighed in
21 saying there are no consequences, so we
22 shouldn't even be talking about this. So

1 that's an underlying debate that, you know,
2 is, quite frankly, challenging because you
3 don't want to see people losing their
4 certificates for things that are beyond their
5 control. But at the same time, the forces
6 that don't want to see those hard restrictions
7 on gene flow use our processed-based standard
8 without a threshold as a rationale for not
9 taking action.

10 CHAIRPERSON STONE: Calvin?

11 MEMBER WALKER: Would you finish
12 your comments on seed purity and, two, the
13 survey? That is very good news. Could you
14 give us a little bit more on the 58 percent
15 and the sample size?

16 MS. BATCHA: Sure. Happy to.
17 I'll do the seed purity first, and I'll try to
18 do a short version of it. You have my written
19 comments. This is the second time we've
20 commented on it. I think it's clear to the
21 Board that OTA's official policy, unanimously
22 adopted by our board, is that we think it's

1 time for the organic standards to evolve vis-
2 a-vis GMO. And that includes looking at a
3 seed purity standard as the first place to
4 start, in terms of controlling the
5 contamination of GMOs in organic products. We
6 see the consumer data showing regular upticks,
7 statistically significant, every year about
8 consumers' concern about GMO in products.
9 They want to look to organic as the gold
10 standard in terms of avoiding GMOs.

11 What we hear from our members and
12 the reason we've gotten involved more deeply
13 in this discussion is that our members are,
14 quite frankly, frustrated. They're seeing a
15 consumer expectation out there for organic,
16 and they're seeing marketplace requirements to
17 not have GMO contamination. So there's a
18 whole set of external requirements on the
19 marketplace right now, whether you're an
20 international trader or selling into retail,
21 that expects that there's testing and limits
22 on the amount of GMO that's in the product.

1 It's not required in the standard, but it is
2 becoming de facto in the marketplace.

3 So whether you're a farmer or a
4 grain elevator operator or an exporter or
5 processor, your interacting with an ad hoc
6 testing system that is existing outside of the
7 organic standards. And whenever you have an
8 ad hoc solution that requires testing, it gets
9 very expensive. The same crop of corn could
10 get tested numerous times throughout the
11 system, and so the costs become burdensome.
12 People are frustrated, and they've committed
13 decades to their organic program, and we're
14 hearing a lot of people fed up. We want to
15 know that our organic certificate is enough to
16 demonstrate that we're meeting this
17 expectation in the marketplace. So it just
18 kind of gets that simple. So it's not about
19 -- I completely understand and we advocated
20 for it at AC 21 the perspective that the
21 makers of the technology need to take
22 responsibility for their products moving into

1 other people's products where they're not
2 wanted, and we're in full agreement with that.
3 But the reality is our members and the farmers
4 and the operators are already taking
5 responsibility because they're having to do
6 the testing, they're having to do the
7 controls. And if you look at seed as a place
8 to start, you could see how rationally then
9 certifiers could engage with growers around
10 the practice standards.

11 So a certifier can't come in and
12 test a crop and say, oh, we're detecting GMO
13 in the corn, and have any idea about how to
14 work for continuous improvement because you
15 just don't know what was in the seed when it
16 was planted. If you can eliminate that from
17 the equation, then the variables are much more
18 discrete. It's buffer zones and it's
19 commingling prevention in the supply chain.
20 And then you can work towards improvement in
21 those areas, and I think it's a very basic
22 concept and I know there's all kinds of

1 details that have to get worked out. We
2 wouldn't want any farmers left behind. We
3 would want to know it was feasible. We
4 wouldn't want to drive people away from
5 choosing organic seed. We want farmers to be
6 able to save their own seed. But, ultimately,
7 if that standard came through on the seed bag,
8 the farmer would know they had a chance to
9 meet the market expectations when they planted
10 it and harvest their crops and moved into the
11 supply chain.

12 And they wouldn't have to be
13 testing the seed. It could come in like the
14 other standards of analysis that come in on
15 seeds, and certifiers could use the five-
16 percent testing requirement to, if they
17 choose, determine whether or not the label is
18 true and the farmer wouldn't have to be
19 testing. So that's sort of the concept, and
20 we'd like to see you all sort of push
21 yourselves to, you know, we know it's going to
22 take a long time, but we encourage you to make

1 a commitment in that regard.

2 CHAIRPERSON STONE: Jean?

3 MEMBER RICHARDSON: Laura, thank
4 you for clarifying the situation with regards
5 the lack of availability for commercial
6 alternatives to the tetracycline antibiotic.
7 What about the situation with Canada? Are you
8 aware from the OTA what is used in Canada for
9 fire blight control? Is it any different to
10 the Europeans?

11 MS. BATCHA: They're not allowed
12 to use antibiotics. We know that, so I would
13 imagine their protocols are similar. They
14 tend to sort of differ that way. I don't have
15 the specifics on that. I could find out for
16 you, Jean. Their tree fruit production is a
17 little bit more geographically limited. A lot
18 of their consumption of tree fruit comes from
19 the U.S. in Canada.

20 CHAIRPERSON STONE: John?

21 MEMBER FOSTER: So I like this
22 union of analytics and process. So what would

1 you guess is the, you know, the final outcome?
2 Are we looking at more organic seed or less
3 organic seed as the seed purity standards
4 moves forward? As you know, many in the
5 audience know, that's kind of what I'm about
6 is more organic stuff, so that's what I'm
7 interested in here with respect to seed --

8 MS. BATCHA: Yes, you know, I
9 think you guys hear us. Sometimes, you don't
10 like it, but consistently we say take the time
11 you need so we don't leave farmers behind.
12 That's what we're saying on antibiotics. So
13 we wouldn't take a different position than
14 that on this. We don't want to see farmers
15 left behind, and we don't want to see acreage
16 move out of organic.

17 I think, to answer that question,
18 you'd have to really look at and ask the
19 question of the farmers that are planting
20 those row crops because you're talking about
21 a pretty small set of crops that would be
22 impacted, at least out of the gate, on this:

1 corn, soy, cotton, a couple of others.

2 So the extent to which people are
3 already using organic corn and soy versus
4 commercially-available non-GMO alternatives,
5 I can't answer that question. But I think
6 that's important because it may have a
7 different organic use rate than, say,
8 vegetable crops, John.

9 So I think you'd have to start
10 with that, and you would want to make sure
11 that you didn't lose growers. But I know that
12 one of the most dramatic drops in acreage for
13 organic and the difference between the '08 NAS
14 census and the 2011 USDA production survey is
15 in the area of corn and soy. We're already
16 losing organic acreage.

17 CHAIRPERSON STONE: Nick?

18 MEMBER MARAVELL: Yes, Laura, just
19 to play devil's advocate, and I know you know
20 I've never done that before, why not let the
21 marketplace handle this specifically within
22 the seed industry? And, that way, the cost

1 would be restricted to the seed industry, and
2 it would be handled on a market basis.

3 MS. BATCHA: You could certainly
4 do that, and that's already happening. There
5 are private contracts that are being put into
6 place. You know that. So there's certain
7 blocks that are not purchasing seed unless it
8 meets that standard. So I think to codify it
9 gives a level playing field for all organic
10 farmers to be buying seed that's disclosed and
11 labeled so that they can, you know, again,
12 sort of have a fighting chance to get out the
13 other side. And I think what you don't gain
14 by that is preventing what a lot of folks are
15 concerned about, which is the erosion of the
16 seal as the gold standard in the minds of the
17 consumer for avoidance of GMOs if it's
18 happening outside of the organic standards
19 itself. But by the time you all get that work
20 done, the private sector will have moved and
21 you'll probably have something that's more
22 feasible and viable by the time you wrestle

1 all the details on it.

2 MEMBER MARAVELL: Well, and this
3 is a little bit more of a statement than a
4 question, but are we transferring the cost and
5 the effort to the organic community here? And
6 in the interest of full disclosure, I'm a corn
7 and seed, organic corn and seed producer. Are
8 we transferring that to the organic community
9 here? Has that meant that we are giving up on
10 looking for other ways to handle this
11 situation?

12 MS. BATCHA: You know, I would
13 really hope that that doesn't mean that we're
14 giving up on other ways to handle that
15 situation, and I think there are ways for the
16 Board to continue to articulate that to the
17 Secretary and keep the pressure on because
18 there's what USDA perceives as legal
19 limitations through their ability to put real
20 teeth into contamination prevention protocols.
21 That absolutely has to get addressed.

22 What we're hearing from our

1 members is the difference is symbolic more
2 than it is, in some, actual. They're already
3 taking responsibility. They're already having
4 to test. They're already having to meet the
5 market requirements. So the cost burdens are
6 already falling on the organic community in a
7 way that is not as controlled as it could be
8 were it to happen through the regulatory
9 framework.

10 So that's sort of the top level
11 what I hear from our members is they're
12 bearing the cost.

13 CHAIRPERSON STONE: Thank you,
14 Laura.

15 MS. BATCHA: Thanks.

16 CHAIRPERSON STONE: So in the
17 effort of trying to be in respect to people's
18 schedules, we're going to back up to the folks
19 that were here for materials, a little closer
20 to their actual time they were advised to be
21 here. Carol Boutard, you're here. And Craig
22 Baker is on deck.

1 MS. BOUTARD: Should I start? Hi.
2 My name is Carol Boutard, and I'm speaking on
3 behalf of Marcus Kastel who can't be here
4 today. I'm a member of the Cornucopia
5 Institute and here today as a citizen
6 lobbyist. Together with my husband Anthony,
7 we run a certified organic farm in the
8 Willamette Valley.

9 Although it is not on the agenda,
10 Cornucopia would like to comment on the
11 conflict of interest issue. We disagree in
12 several ways with the memo by USDA's Mr.
13 McEvoy to the NOSB chair, which appears to
14 attempt to highjack the process of developing
15 an improved conflict of interest policy,
16 historically, under the purview of the Board.

17 In light of this recent memo, we
18 urge the Board to reclaim authority. This is
19 especially important given the USDA's severely
20 guidelines for determining whether a conflict
21 of interest exists. The NOP essentially
22 states that no conflict of interest exists if

1 at least one other business entity has an
2 interest in the vote, as well. This ignores
3 the very basic definition of a conflict of
4 interest, which has nothing to do with whether
5 others have a conflict of interest, as well.
6 Two conflicts of interest do not cancel the
7 other out.

8 A conflict of interest exists when
9 a Board member has an interest that would
10 impair his or her objectivity when voting. A
11 Board member's primary responsibility is to
12 the entire organic community and to organic
13 integrity. Yet, the USDA has changed the
14 definition of a conflict of interest by adding
15 the criterion of disproportionate benefit. A
16 conflict of interest has nothing to do with
17 whether others stand to benefit, as well. It
18 is about whether a secondary interest impairs
19 a Board member's objectivity and
20 responsibility to the organic community as a
21 whole.

22 If a Board member's employer,

1 including its CEO, lobbies NOSB members for
2 their vote, as happened prior to last year's
3 carrageenan vote, how does that Board member
4 not have a conflict of interest? Was that
5 Board member able to look objectively at the
6 science and make an objective decision, given
7 her employer's clear interest in the outcome
8 of the vote? Just because another Board
9 member has a conflict of interest doesn't mean
10 she didn't. It means there were two Board
11 members with a conflict of interest.

12 Again, this is about whether a
13 secondary interest unduly influences a Board
14 member's ability to look objectively at the
15 material and vote in the interest of the
16 entire organic community. It has nothing to
17 do with whether others benefit, as well.

18 We are also concerned that the
19 USDA sets different standards for for-profit
20 business employees and non-profit employees.
21 A for-profit business employee, according to
22 the USDA, can vote as long as others stand to

1 gain from the vote, as well. But a non-profit
2 employee is expected to recuse him or herself
3 if a donation was received, regardless of
4 whether other non-profits are also the
5 recipients of charitable donations by a
6 petitioner. This double standard is not
7 acceptable.

8 For the upcoming tetracycline
9 vote, we believe two Board members involved in
10 organic apple and pear production have a
11 conflict of interest and should recuse
12 themselves to protect the integrity of the
13 process. Our aggressive pursuit in this
14 matter is not an attempt to embarrass any
15 Board members. It would reflect a highly
16 ethical approach to voluntarily step away from
17 such a vote. Thank you.

18 And as a farmer who has carefully
19 followed organic standards for many years, I
20 was personally insulted by the memo from
21 Director McEvoy because anything that
22 challenges the quality of the USA organic mark

1 is unacceptable. Thank you. And I'm sorry I
2 read that so fast.

3 CHAIRPERSON STONE: Thank you. Is
4 there questions? Zea?

5 MEMBER SONNABEND: I'm one of
6 those people you're accusing. How do you know
7 I have a conflict of interest?

8 MS. BOUTARD: I personally do not
9 know if you have a conflict of interest. In
10 a direct question like that, I would like to
11 refer to Charlotte Vallaeys, who would
12 probably have a clearer notion of that.

13 MEMBER SONNABEND: No, no
14 referrals.

15 MS. BOUTARD: Okay.

16 MEMBER SONNABEND: But you did
17 accuse me in your statement, and I submit that
18 you have no idea if I have a conflict of
19 interest or not.

20 MS. BOUTARD: I have great
21 confidence in Mark Kastel's impression of the
22 events that occurred, and I would refer, I

1 would stand behind any statement that he made.

2 CHAIRPERSON STONE: Thank you for
3 you being here. Thank you.

4 MS. BOUTARD: Thank you.

5 CHAIRPERSON STONE: Dag, sorry I
6 stepped around you. And that puts Craig Baker
7 on deck.

8 MR. FALCK: Hi. I'm Dag Falck,
9 organic program manager for Nature's Path
10 Foods. Thank you for this opportunity to
11 comment. Nature's Path Foods is North
12 America's first and still largest certified
13 organic breakfast cereal producer, and our
14 highest priority is to keep organic standards
15 strong and to prevent GMO contamination.

16 We support tightening the excluded
17 methods language to be more accurate. Rather
18 than using specific examples, we propose broad
19 but accurate descriptions. And I'll just give
20 you a very brief example. I drafted a
21 rewording of it. Methods that change the
22 genetic material of an organism through

1 recombining DNA in ways that are not dependent
2 on the use of conjugating sexual or asexual
3 reproduction methods. And there's some more
4 detail in my written submissions.

5 In general, we feel that the
6 current standard does prohibit GMOs in organic
7 food production, but it does not prescribe the
8 necessary tools to prevent GMO contamination
9 from increasing in organic. This must be
10 addressed so we don't allow uncontrolled
11 contamination to start creeping into organic
12 food production.

13 GMOs cannot be seen. Therefore,
14 we must use testing for a farmer to know if he
15 or she is planting a GMO-contaminated crop or
16 not. Without mandated testing for GMOs in
17 organic, there is no way to stop GMO
18 contamination increasing year by year.

19 We strongly propose that the NOP
20 should prescribe the using of PCR testing and
21 to set a maximum contamination level for the
22 protection of the farmers. In our experience

1 as a manufacturer, 0.9 percent in ingredients
2 is achievable but not easy for organic
3 products. To achieve 0.9 ingredients, seed
4 thresholds probably need to be set at 0.5
5 percent.

6 On the issue of how to express the
7 levels, the proposal from the committee talked
8 about a number of seeds in the sample, and we
9 propose that that's not the best way to
10 express. We think it should stay with the
11 percentage because that's what's being used
12 currently, and it's not confusing. And we
13 think that using seeds in the sample would be
14 confusing.

15 We do not think that organic
16 should accept or tolerate any level of GMO
17 contamination. A threshold is only a
18 practical way to ensure farmer protection and
19 to make it possible to measure and achieve
20 continuous improvement. And as soon as
21 possible, the threshold should be reduced
22 until the day GMOs are eradicated in organic.

1 A different topic. Nature's Path
2 also wishes to comment again on why we need
3 nanotechnology regulated in the NOP. The
4 urgency of this is increasing daily as the
5 field of applied nanotechnology is increasing
6 at a fast pace. Only April last year, the FDA
7 came out with a draft guidance document for
8 comment, including nanotechnology. It's in my
9 written documentation comments so you can look
10 up the link to it.

11 This guidance is moving in the
12 direction of treating substances that are
13 intentionally reduced to nano size in a
14 different way than their macro-sized
15 equivalents. Organic, at this point, does not
16 differentiate that. We believe it's not
17 difficult to clearly define and regulate
18 nanotechnology in organic without causing
19 unintentional disruption.

20 And, last, we feel, Nature's Path
21 feels that it's time to ensure that
22 tetracycline used in organic is ended. And

1 the only way to accomplish this is to ban it
2 as quickly as we're possibly able to do so.
3 Thank you.

4 CHAIRPERSON STONE: Thank you.
5 Questions? Nick?

6 MEMBER MARAVELL: I was wondering,
7 you refer to a threshold of GMO contamination
8 in organic product at 0.9 percent. This is
9 currently a standard used in Europe. Do you
10 have any thoughts on whether or not the U.S.
11 should just fall into line with that or create
12 its own threshold separately? And then the
13 second question I have is you indicated that,
14 for seed, the threshold should probably be 0.5
15 percent, and I was just wondering if you could
16 explain a little bit of your rationale basis
17 for that.

18 MR. FALCK: Okay. Yes, I do
19 believe we should stay with the 0.9 percent
20 threshold for food, both because the EU has
21 set that and also because the Non-GMO Project
22 has several years' history with working with

1 that threshold. And so we know it's
2 achievable. We know it's hard, so we know
3 it's not an easy slam dunk kind of thing,
4 anybody can do it. We know it's actually very
5 difficult to do it. We reject product in our
6 supply stream with that threshold.

7 So we think it's tough, but we
8 think it's achievable. And we think that's
9 kind of exactly where we need to be because
10 the idea here, the objective is to use a tool
11 to drive contamination down. So we have to
12 set it where we can live with it and then
13 drive it down. If we don't set it now and we
14 wait another few years, that level, that
15 balanced level is going to be higher than it
16 is today. So the sooner we set it, I think
17 the sooner we have the tools to start reducing
18 it.

19 And so I think that is the level
20 that we found from our experiences that is
21 achievable. And, of course, it's handy to
22 have the same level as the EU, as well.

1 The reason I recommended 0.5 for
2 seed is because if you plant contaminated seed
3 in a field, the contamination increases
4 because what a GMO is is it's a technology
5 tied to a living organism, a living and
6 reproducing organism. So it's not like a
7 pesticide where you put it on and it
8 diminishes over time, you know, it dilutes in
9 the environment. What a GMO does is it's tied
10 to a living organism that breeds and
11 reproduces, and pollen that is spread from
12 that one plant goes and affects other plants.
13 And then more seeds are genetically engineered
14 going forward.

15 So, you know, theoretically at
16 least, we know that chances of increased
17 contamination, so if you start with a certain
18 percentage of contamination in the field,
19 chances are you're going to have a higher
20 percentage of contamination at the end.

21 That's why we need to start at a low level in
22 order to achieve because there's other sources

1 of contamination, as well, in seed cleaning
2 and so on.

3 MEMBER MARAVELL: I can understand
4 that rationale. Are you aware of any studies
5 or data on this? There's also a possibility
6 that the GMO, I'm not saying this is true, but
7 there's also a possibility that the GMO will
8 not be as selectively adapted in a particular
9 area and actually won't increase. It could go
10 either way. But chances are, you are correct,
11 it will continue to increase. But I was just
12 wondering if you're aware of any data, any
13 studies, or anything on that that would be
14 helpful to us?

15 MR. FALCK: I believe there are
16 some references to it in the Myths and Facts
17 on GMO. Is that the right term for it? I
18 think there's a paper by John Fagan and some
19 other scientists. I think they treat that
20 issue there, but I'd have to go back to find
21 the specific source of it.

22 But some studies have been done,

1 but what we do know from experience, for
2 instance with flax in Canada, you know, ten
3 years ago there was some flax used and then it
4 was taken out of the system because the
5 farmers decided they didn't want to have it or
6 the Flax Council of Canada decided that they
7 wanted to end it. And so they did. They
8 thought they got rid of it, and then years and
9 years later the Europeans found it in Canadian
10 organic flax shipments. So we know even with
11 the best intentions, it got out of, you know,
12 it grew.

13 So we do have some experience with
14 that. Canola is another example where we know
15 it started out being there, and then the
16 contamination increased to the point where no
17 certifier was willing to certify organic
18 canola in Canada.

19 CHAIRPERSON STONE: Thank you very
20 much. We have Craig Baker, and Christine Hall
21 is on deck.

22 MR. BAKER: Hello. My name is

1 Craig Baker, and I'm a consumer, along with my
2 family, of organic foods. I'm a member of the
3 Cornucopia Institute, and I'm here today as a
4 citizen lobbyist. I volunteered to help
5 present testimony because I want to ensure the
6 integrity of organic food. Today, I will
7 comment on two items: production aids and
8 limited scope technical reviews.

9 As more farmers switch to organic
10 certification, more materials have been
11 petitioned for use in organic crop
12 productions. The approved materials give
13 farmers more tools to use in their organic
14 toolbox, but, at the same time, the NOSB must
15 be careful to adhere to the categories of
16 substances allowed via the Organic Foods
17 Production Act.

18 One of these categories, the
19 production aids, has been used as a catchall
20 for any material that does not fit into any
21 other category. But it is not intended to be
22 used as such. We urge the NOSB to clarify

1 this term. The examples given in OFPA are
2 clear. Production aids are materials that are
3 not dispersed in the environment and are not
4 taken up by plants.

5 We request that the NOP adhere to
6 a strict definition of production aids. We
7 also request that the NOSB adhere to a strict
8 definition of production aids as they are
9 asked to review the petitioned materials. The
10 production aids category includes only
11 physical items used in production without
12 leaving any residues on the crop or in the
13 environment. Production aids can also include
14 chemicals used to clean and sanitize equipment
15 but not used on crops or livestock. Materials
16 that do not fit that description should not be
17 called production aids. It may mean that some
18 petitioned materials will not be reviewed for
19 addition to the National List.

20 Using this strict definition will
21 reassure consumers about the integrity of the
22 organic label. It will also save time. The

1 NOSB need not review materials that do not fit
2 the strict definition.

3 We support the proposal to
4 establish a process for limited scope
5 technical reviews. We support the proposal as
6 a way to save time and resources in cases
7 where certain threshold criteria are not met
8 and a full TR would not be warranted.

9 I personally was shocked earlier
10 today to learn that antibiotics are still
11 being used in organic pear and apple
12 production. Myself, as a consumer and father,
13 am outraged that this has gone on for as long
14 as it has. I'm asking you to please keep the
15 2014 deadline and remove tetracycline.

16 Lastly, I expect all ingredients,
17 including ingredients of ingredients, to be
18 either organic or on the National List. Thank
19 you for your time.

20 CHAIRPERSON STONE: Thank you.
21 Questions? All right. Thank you very much.
22 Christine Hall is up, and Anthony Boutard is

1 on deck.

2 MS. HALL: Hi. Good afternoon.
3 I'm Christine Hall. I am a member of the
4 Cornucopia Institute and here today as a
5 citizen lobbyist. I would like to comment
6 specifically on the proposed recommendation
7 number two and the confidential business
8 information discussion document and why such
9 a policy would be unacceptable and likely
10 illegal in the sense that it would facilitate
11 violations of the Organic Food Production Act
12 of 1990.

13 The subcommittee asked the
14 following question, "Provision one and
15 possible recommendation two is about using an
16 affidavit to supplement a CBI petition.
17 Comment on whether this is valuable." Under
18 no circumstances should a petitioner be
19 allowed to sign an affidavit stating that its
20 ingredients and processing aids comply with
21 the OFPA, which is, essentially, a proposal to
22 allow manufacturers to regulate themselves.

1 Such a provision would prevent NOSB members
2 from fulfilling their legal responsibilities
3 under OFPA.

4 Manufacturers are allowed to
5 police themselves by the FDA, which allows
6 manufacturers to make their own determination
7 regarding the safety of new food additives
8 called the GRAS system. This system has come
9 under heavy criticism, rightfully so, from the
10 Government Accountability Office, the Pew
11 Trust, and the media.

12 The organic system was designed to
13 offer an alternative where independent panels,
14 the NOSB, independent scientists, the
15 technical reviewers, and public collaborate on
16 determining whether ingredients, additives,
17 and inputs are appropriate in food production
18 and processing. Allowing manufacturers to
19 sign affidavits would be asking them to
20 essentially perform their own technical
21 reviews, which is entirely unacceptable both
22 in the terms of OFPA and the consumer

1 confidence in the organic label.

2 The subcommittee also asked,
3 "Should procedures, such as the
4 confidentiality agreement, be developed that
5 would allow NOSB but not the public to see any
6 CBI?" The Cornucopia Institute believes that
7 this would be unacceptable for several
8 reasons. First, the NOSB, which is not a
9 scientific body, benefits from public input.
10 NOSB members depend on research and a
11 diversity of opinion from professionals in the
12 organic community to help them in their
13 decision-making process. If certain
14 information is withheld from the public, it
15 weakens NOSB's abilities to solicit and
16 consider public input from the public.

17 We oppose the proposal to
18 introduce confidentiality agreements designed
19 to keep the public in the dark. Second, the
20 NOSB members need to be able to speak freely
21 and discussions during public meetings must be
22 uninhibited. It would be impossible for NOSB

1 members to discuss a petition if they have
2 information that is confidential and protected
3 from public disclosure and could potentially
4 open up these volunteers or the USDA to civil
5 action if confidentiality is inadvertently
6 breached.

7 For these reasons, Cornucopia
8 supports recommendation one. Possible
9 recommendation two appears to be an attempt to
10 keep the NOSB and/or the public in the dark.
11 We need to move towards more transparency, not
12 more secrecy. Thank you.

13 CHAIRPERSON STONE: Thank you.
14 Questions from the Board? John?

15 MEMBER FOSTER: What's the source
16 of the information you're drawing, you're
17 commenting on here?

18 MS. HALL: It's Cornucopia
19 Institute. Okay? Okay.

20 CHAIRPERSON STONE: All right.
21 Thank you very much.

22 MS. HALL: Thank you very much.

1 Appreciate it.

2 CHAIRPERSON STONE: Anthony
3 Boutard? I hope I'm pronouncing that at least
4 close enough for you to recognize it.

5 MR. BOUTARD: Precisely. Thank
6 you. Good afternoon. My name is Anthony
7 Boutard. I'm a certified organic farmer here
8 in the Willamette Valley, about 35 miles due
9 west of here in Gaston, Oregon. And I am part
10 of the extended voice of Cornucopia this
11 afternoon, so I'll be reading some prepared
12 remarks.

13 I'm going to be, I'm commenting on
14 the Materials Subcommittee discussion document
15 on confidential business information. The
16 Organic Foods Production Act of 1990 specifies
17 that materials may only be added to organic
18 foods or to the National List if certain
19 criteria are met. The NOSB is not able to
20 make an informed decision whether a material
21 meets these criteria if critical information
22 is missing. I think this is really important

1 stuff, and this is from the heart.

2 The only acceptable recommendation
3 in terms of ensuring that the NOSB decisions
4 are in compliance with the federal organic law
5 is proposed recommendation number one, and it
6 should be right there up there in the front
7 for you when you make your decisions.

8 Information necessary to make an
9 informed decision based on OFPA's -- I hate
10 those acronyms -- criteria includes the full
11 list of ingredients, sub-ingredients,
12 processing aids, manufacturing processes, and
13 complete disclosure of all known human and
14 health environmental impacts. OFPA
15 specifically states that NOSB must work with
16 manufacturers to obtain a full list of
17 ingredients of petitioned materials. OFPA
18 also states that materials cannot be added to
19 National List if they're harmful to human
20 health or the environment. The only way to
21 determine whether a material is harmful to
22 health or to the environment is by considering

1 all the available data, including knowing
2 which processing aids are used and having
3 access to results from all safety studies, and
4 I say this, once again, from my heart as a
5 scientist.

6 Therefore, petitioners should not
7 be able to withhold any information regarding
8 processing aids or studies on human health
9 effects or environmental impacts. The
10 discussion document mentions the Trade Secrets
11 Act, but it is important to note that OFPA is
12 not subordinate to the Trade Secrets Act, nor
13 does it state that any information necessary
14 to carry out the requirements of OFPA is
15 exempt under the Trade Secrets Act. Clearly,
16 the Trade Secrets Act does not supercede OFPA
17 or the responsibility of the NOSB to carry out
18 their responsibilities.

19 Participation in the organic
20 industry is voluntary. If a manufacture is
21 unwilling to share information about
22 ingredients, processing aids, or human

1 health/environmental impacts to protect trade
2 secrets, the USDA is under no obligation to
3 make an exception for such manufacturers.
4 Manufacturers who wish to keep the public in
5 the dark about their ingredients and
6 processing aids can sell their products in
7 conventional food stream. They can also apply
8 for patent protection if they have a truly
9 unique product.

10 The organic label is an
11 alternative to conventional foods, an
12 alternative food system marked by transparency
13 and careful scrutiny. Manufacturers cannot
14 have it both ways. Transparency is a
15 prerequisite to participation in the organic
16 food system. And that includes me, too, as an
17 organic farmer. I can't go to Tilth and tell
18 them, well, you know, some of this stuff I
19 like to keep under my wings because I, you
20 know, but it is organic. That transparency
21 should carry through the system from the
22 farmer all the way up to the processor.

1 Any petition with ingredients or
2 processing aids with human
3 health/environmental impact withheld as
4 confidential should automatically be sent back
5 to the petitioner by the NOP without wasting
6 the time of the NOSB. And I hope I haven't
7 wasted your time this afternoon. Thank you.
8 Good day.

9 CHAIRPERSON STONE: Thank you.
10 Any -- we'll take that slip of the tongue. It
11 happens all the time. Any questions? All
12 right. Thank you very much. Kathy Felch?
13 Kathy is here. Pam Larry? I think it's not
14 Larry Pam, but if there's a Larry Pam we got
15 it backwards. Very good. Jennifer
16 Forthmuller will be on deck. If you'd state
17 your name and relationship, please.

18 MS. LARRY: Sure. My name is Pam
19 Larry, and I am a grandmother from Chico,
20 California, and my business card says I am the
21 initial instigator and chief rabble-rouser for
22 Prop 37, the California ballot initiative to

1 label genetically-engineered foods. This is
2 the first time I've been to the National
3 Organic Standard Board meeting. I tried to
4 come the last two times but was very busy with
5 the campaigning stuff. Even though we did not
6 prevail at the ballot, I can tell you that the
7 movement to label genetically-engineered foods
8 has increased exponentially around the
9 country.

10 I come here representing myself,
11 the people of California. I'm also a member
12 of a nationwide coalition. I do not speak for
13 them, but I have talked to many of them and I
14 want to share with you some of the things that
15 are concerns.

16 I was very happy to see that OTA
17 had done a study on, a survey on confidence in
18 organics, but I'm wanting to know if people
19 know what the organic symbol means because I
20 have learned quite a bit today and I can tell
21 you that I trust the organic seal a lot less
22 after having been here.

1 So what does it mean here? It
2 means a lot, and it seems like it's a
3 constantly moving target. I can tell you what
4 it means out in the field, which is what I
5 call the general public that I come in contact
6 with, hundreds and thousands of mothers and
7 fathers and grandmothers and grandfathers.
8 It's a purity, it's a purity of food. They
9 don't think that there are antibiotics or
10 genetically-engineered stuff or pesticides or
11 chemicals or synthetic stuff are in there.
12 They think natural food is organic. So, you
13 know, their concept of organic is nothing what
14 it is. And I can tell you that if they knew
15 they would be even less trustful than they are
16 now. And I worry about that because I would
17 like to see there be integrity in the seal.

18 I'm asked constantly during the
19 campaign and I continue to be asked by moms,
20 "Well, if I buy organic food, I'm safe, right?
21 I know that that means that there's no
22 genetically-engineered products in there."

1 And at the beginning of my journey down this
2 rabbit hole, I would have said yes. But now
3 I cannot answer them truthfully that way.

4 What I have to say to them is that
5 if you buy USDA certified organic, you've got
6 a lot more chance of there not being GMOs, of
7 it not being contaminated. If you buy
8 products that are Non-GMO Project certified,
9 you have the knowledge that there's 0.9
10 percent or less in there. But just because
11 you buy something organic does not mean it
12 doesn't have genetically-engineered products
13 in it, and I think that's the little secret
14 that I don't hear talked about a whole lot.

15 Albert Strauss showed the chart up
16 there earlier today. I've spoken with farmers
17 in Jackson County who grow chard and who have
18 plowed under their organic seed chard
19 businesses because they are afraid that their
20 product is contaminated with Syngenta's sugar
21 beet stuff. I don't know anymore. I'm
22 considering not even buying chard anymore or

1 table beets because I don't know what's even
2 in my own area of Bute County because we grow
3 a lot of sugar beets there. I no longer eat
4 corn because I don't trust that it's not
5 contaminated.

6 I would like to trust the USDA
7 organic symbol. I would like to be able to
8 tell other people to trust it. And we count
9 on you folks to establish that gold standard
10 that I've heard about so much here before.

11 Along those lines -- oh, my God,
12 four minutes. Okay. So AC 21, I would like
13 to please say that we do not, I have not
14 talked to one person who thinks that just
15 offering farmers insurance is a good idea.
16 Organic farmers must be protected. You must
17 hold a line, or you're going to be talking
18 about the same kind of stuff to clean up the
19 mess that I've been hearing about today with
20 the antibiotics in five years. Please,
21 establish the standard and then get it to zero
22 tolerance. Thank you.

1 CHAIRPERSON STONE: Thank you.

2 Any questions? Jay?

3 MEMBER FELDMAN: Hi. Thanks for
4 coming.

5 MS. LARRY: Yes.

6 MEMBER FELDMAN: One, thanks for
7 your good work on Proposition 35.

8 MS. LARRY: Seven.

9 MEMBER FELDMAN: Thirty-seven. I
10 saw the statistics on the level of involvement
11 from different groups, demographic groups of
12 people, and the level of Hispanic population
13 involvement in voting for, the level of
14 African-American community is extraordinarily
15 high. We tend not to appreciate that when we
16 talk about people in different communities
17 concern about food safety and purity, but it's
18 even higher than the percentage of white
19 educated women. So we have, we have a
20 community out there that cares about their
21 food and, certainly, your work has shown that.

22 What I'm interested in asking you

1 is about engaging the public more in this
2 process as a process that takes what is a very
3 sound and protective statute, which I hope you
4 have a chance to sit down and read, the
5 Organic Foods Production Act. It's a really
6 interesting law but, without public
7 involvement, cannot achieve the spirit and
8 intent because, like any law, it can be
9 overrun by special interests that want a piece
10 of the pie, from an economic perspective, but
11 don't necessarily buy into the core values.

12 So my question to you is, doing
13 what you did in terms of organizing people in
14 different demographic groups that care about
15 what's in their food, what would you see as
16 the opportunity to engage the public more in
17 the process that we're engaged in here?
18 Because I can tell you if you were sitting at
19 a meeting like this of conventional food
20 producers growing food in the chemical-
21 intensive industrial, you know, side of the
22 equation, the story is much, much, much worse.

1 So we need the help of people like yourself
2 and your advice to this board as to how to
3 better reach out and engage the public so that
4 the standards that are in this statute, which
5 are incredible standards of protection of
6 human health, biodiversity, beneficial
7 organisms, air, water, land, etcetera, how do
8 we engage the public so that what you just
9 communicated to us is really felt by this
10 board so that it can, you know, adopt the
11 right positions that enable it to grow?
12 Because we want, everybody here wants it to
13 grow. Everybody that's sitting at this table
14 wants it to grow --

15 MS. LARRY: I believe that.

16 MEMBER FELDMAN: -- and are
17 bringing their own perspective to that. But
18 we can't do it without your involvement and
19 kind of the people that you have worked with
20 so effectively.

21 MS. LARRY: I would suggest you
22 have town hall meetings where you get out --

1 I know it sounds like you guys work
2 tremendously hard and when would you fit it
3 into your schedule. I get it. And I also
4 want to really express that I appreciate all
5 of your very difficult, your hard work and
6 your commitment to this. And I know that many
7 of us have different definitions of stuff, and
8 I want to honor that.

9 But town hall meetings. I think
10 it's really important to not just do surveys
11 because surveys, you're asking the questions,
12 you're not listening to people and allowing
13 them to just speak from their perspective
14 without your direction. This is not to say
15 never to do a survey. I'm just saying there
16 are two ways of communicating. One, you only
17 give -- I never can answer a survey because
18 it's never my answer. You know, you only give
19 me certain options or something like that. So
20 get out and meet and talk to the people on the
21 ground. You know, internet activism is really
22 important. It's a crucial piece of what we

1 do, but not everybody is on the internet. A
2 lot of people aren't.

3 There's a huge gap between what
4 exists -- again, I've been working in this,
5 like, double full time for two years now, and
6 I still have a lot to learn. A mother doesn't
7 have time to go out and learn, like I call it
8 a college-level course of trying to figure out
9 what's in our food supply. And so we count on
10 things like this symbol to be that gold
11 standard, not just, oh, well, you know, at
12 least it's not as bad as conventional. That's
13 the option that I'm seeing right now with USDA
14 certified organic, and I would like to be able
15 to go into my store and know that, when I pick
16 this item up, I'm not going to, you know, in
17 the future, we've got to figure out
18 definitions. You know, RNAI, DSRNA, you know,
19 the nanotechnology thing. Thank God you're at
20 least looking at that. Synthetic biology.
21 What are we doing to our food, and when did it
22 become elitist to want real food? I mean, I

1 don't get that part.

2 But I would do a town hall meeting
3 or five in each county. I'm just saying, I
4 realize that that's cost prohibitive, but
5 really listening to people.

6 MEMBER FELDMAN: Thank you.

7 CHAIRPERSON STONE: Nick?

8 MEMBER MARAVELL: Yes, I want to
9 thank you for your wonderful efforts and the
10 fact that those efforts have spawned more
11 efforts in other states. You told us a little
12 bit about your education, your evolution about
13 finding out about GMOs and somewhat of their
14 use or non-use in organic products. But you
15 stopped short of saying what happens now when
16 you tell those consumers that, well, it's not
17 exactly like I thought it was with USDA
18 organic? What is their reaction now? What is
19 it that they are saying to you?

20 MS. LARRY: Well, first of all, I
21 look at their faces, okay, and their faces,
22 they're shocked. They have trusted this

1 symbol, and they feel betrayed. I mean, I
2 don't mean to be overly dramatic here. I am
3 an Italian Leo, so I tend towards the
4 dramatic. But I'm just saying they feel
5 betrayed, and many of them are angry. So
6 that's what happens when you feel betrayed.
7 You get angry.

8 Now, many of them are reasonable
9 people, and they want to at least have
10 something better than conventional, so they
11 may still buy. But I am concerned that, as
12 time goes on and the erosion of the trust, why
13 would somebody go out and, if all they have is
14 an option to get organic food is to go to
15 Whole Foods, why would they be willing to
16 spend three times more on something and then
17 find out it's very little, there's very little
18 difference between it and conventional? And
19 that's kind of what's starting to happen more
20 and more is different things are allowed in
21 or, like, I'm finding out, I had no clue
22 antibiotics were on apples or pears. I'm not

1 going to eat them anymore unless I ask and I
2 find out directly from the producer.

3 So that's what happens, and
4 they're getting angry and they're starting to
5 really get angry. And the good news is is
6 they're starting to get out on the streets
7 more. Mothers who voted no on Prop 37 because
8 they listened and they believed the PR,
9 they're now so angry they're becoming leaders
10 in their areas in California to fight this.
11 And I want to know why it is that moms who are
12 busy just trying to raise their family and
13 have healthy families have to do this kind of
14 work on top of everything else?

15 You know, I would like to see,
16 we've got to hold the line at some point. At
17 some point, you're going to have the same
18 kinds of discussions with GMOs that I've been
19 hearing about with antibiotics today. The
20 sooner the line is drawn the less difficult
21 and complicated it's going to be to remedy on
22 the other side. You're not going to have to

1 do a whole bunch of clean-up along with
2 establishing new protocols if you establish
3 protocols now and stick with them.

4 And, really, I mean, 0.9 percent
5 is fine, but, I mean, I think that truth is a
6 very difficult thing for us to grasp
7 sometimes, but what is this for? And maybe we
8 just have to let go of some products as being
9 organic, and that's the truth because if we
10 don't tell the truth about the corn -- and the
11 corn is contaminated. It just is. There's no
12 amount of hiding, and I know we want to
13 protect farmers and I want to protect farmers
14 because I love farmers. Some of my best
15 friends are farmers. But we have to tell the
16 truth because if we don't tell the truth about
17 this now then what else is going to be so
18 contaminated -- and I realize that this board
19 is not trying to sneak things in, okay? I
20 don't believe that at all. But I do believe
21 that there are interests out there that are,
22 and the longer this board takes to fight, you

1 know, draw a very strong line, the more you
2 leave yourselves open to being seen as
3 colluding, whether you are or not. Does that
4 make sense? I mean, not that I would agree
5 with it, but I'm just saying, you know, I'm
6 just saying.

7 CHAIRPERSON STONE: Thank you very
8 much for saying it.

9 MS. LARRY: Sure. Okay.

10 CHAIRPERSON STONE: We were
11 listening very closely. I was watching the
12 Board members. Any other questions? Great.
13 Thank you --

14 MS. LARRY: Thank you so very much
15 for listening.

16 CHAIRPERSON STONE: Thank you for
17 being here. Jennifer Forthmuller? I didn't
18 see any movement a minute ago on there. Is
19 there anyone that got an email that was
20 scheduled to be here today that wasn't here
21 when your name was called? Okay.

22 So, Board members, there were

1 several no-shows today. I let the
2 conversation run because we had the
3 opportunity. I think it was a great
4 opportunity to ask questions and allow some
5 positioning of the questions, which took a
6 fair bit of time. So tomorrow we may not have
7 that luxury. We heard a lot. We were able to
8 ask a lot of questions on different topics
9 today that we'll have to be a little more
10 reserved tomorrow.

11 So I just sort of put that out
12 there. If you acted like I was in a bad mood
13 tomorrow, it's not that. It's just that it's
14 a time factor here.

15 So we're scheduled to be back at
16 8:00 in the morning. Is there any other --
17 Michelle, do we have anything you need to let
18 us know? So I appreciate all the input today,
19 thank the audience. The audience, again,
20 appreciate your participation. If you were
21 one of those that got to stand here longer and
22 I cut you off tomorrow, again, it's not

1 personal. It's I'm cutting the audience off,
2 as well as Board members, depending on how the
3 schedule unfolds.

4 So thank you. We will recess
5 until tomorrow morning at 8:00.

6 (Whereupon, the above-entitled
7 matter went off the record at 4:54 p.m.)

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19
20
21
22

| A | | | | |
|----------------------------|----------------------------|----------------------------|----------------------------|---------------------------|
| abilities 375:15 | 363:16 | 106:12 212:22 | 323:17 331:22 | 263:5,11 |
| ability 75:21 | acceptable 39:1,3,4 | acknowledges 70:9 | 347:5,8 | ADHD 153:18 |
| 167:17 204:7 | 257:15 259:5 | acknowledging | adapt 204:8 | adhere 370:15 |
| 268:7 354:19 | 359:7 378:2 | 68:17 | adapted 368:8 | 371:5,7 |
| 358:14 | acceptance 19:13 | acknowledgment | add 216:13 255:20 | Adjournment 3:22 |
| able 25:9 28:8 | accepted 49:4 | 145:16 | 264:5 331:13 | adjust 137:9 195:9 |
| 55:11 68:5 90:2 | 290:3,21 | acre 104:17 | added 162:13 | adjustments 19:2 |
| 110:9 114:8,13,14 | accepts 320:18 | acreage 117:3 | 255:11 264:10 | adjuvants 286:9 |
| 127:9 149:14 | access 20:10 46:7 | 118:3,8 131:3,4 | 285:11 311:8 | administration |
| 180:22 195:10 | 51:19 70:10 79:2 | 220:21 228:22 | 377:17 378:18 | 11:11 |
| 198:18 222:11 | 146:7,11 379:3 | 351:15 352:12,16 | adding 76:9 184:20 | administrations |
| 245:18 248:14 | accessible 54:20 | acres 28:11 32:12 | 331:9 344:1 | 198:3 |
| 315:19 325:13 | 55:3 95:20 233:3 | 100:16 103:9 | 357:14 | administrative |
| 332:13 336:16,19 | accompanying | 105:4,5 129:21 | addition 85:1 125:9 | 23:8 |
| 339:13 349:6 | 310:16 | 250:21 268:14 | 157:9 210:17 | administrator 2:12 |
| 358:5 365:2 | accomplish 36:1 | 270:10,11 274:13 | 296:22 305:9 | 13:14 |
| 375:20 377:19 | 88:1 310:20 365:1 | 274:20 275:10,11 | 371:19 | admitted 110:11 |
| 379:7 385:7 | Accountability | acronym 37:4 | additional 44:11 | adopt 107:6 117:2 |
| 390:14 396:7 | 374:10 | acronyms 378:10 | 87:15 99:15,16 | 119:13 144:11 |
| aboard 229:5 | accountable 70:3 | act 63:9 67:22 | 126:6 324:2,12 | 295:12 388:10 |
| above-entitled | 322:20 330:1,2 | 88:10 158:4 228:8 | Additionally 90:6 | adopted 124:22 |
| 136:16 204:20 | accredit 231:9 | 229:11 312:1 | additions 200:18 | 149:3 345:22 |
| 283:11 397:6 | accreditation 7:4 | 323:13 370:17 | additives 43:3 | adopting 123:20 |
| absence 36:15 | 8:19 9:16 34:9 | 373:11 377:16 | 142:10,11 145:5 | adoption 107:14 |
| 117:20 | 53:8 57:19 58:19 | 379:11,12,15,16 | 171:5 374:7,16 | 117:1 119:11 |
| absolute 82:14 85:7 | 60:2 63:14 66:13 | 387:5 | address 18:15,21 | 124:21 125:2,3 |
| absolutely 27:19 | accredited 34:3 | acted 113:10 | 95:12 99:7 114:8 | advance 19:14 |
| 29:7 81:18 122:9 | 74:5 77:14 144:3 | 396:12 | 116:5 132:16 | Advancement |
| 124:8 133:21 | accumulation | action 58:7 64:1,2 | 133:14 135:12 | 195:18 |
| 136:4 220:12 | 182:16 340:15,16 | 172:9 196:1 | 184:19 203:9 | advantage 39:15 |
| 260:3 294:10 | accurate 318:2 | 242:16,19 243:5,5 | 234:15 253:15 | 73:4 |
| 354:21 | 361:17,19 | 300:21 345:9 | 289:18 304:17 | advantages 173:15 |
| AC 328:15,16 | accurately 301:9 | 376:5 | 305:11 307:11 | 313:4 |
| 338:2 342:17,18 | accusations 69:20 | active 58:12 171:5 | 316:1 321:9 | adverse 91:6,14 |
| 343:1,19 344:9 | accuse 360:17 | 286:11,15 | 338:15 | adversely 112:19 |
| 347:20 385:12 | accused 333:5 | activism 389:21 | addressed 44:14 | advice 17:1 60:22 |
| ACA 120:4 144:21 | accusing 360:6 | activities 37:14 | 64:5 119:22 228:5 | 61:12 388:2 |
| 145:15 146:4 | achievable 78:7 | 38:21,22 70:2 | 297:4,10 354:21 | advised 355:20 |
| 149:12 277:17 | 96:12 363:2 366:2 | 203:2 | 362:10 | advisement 285:4 |
| 278:11 279:13 | 366:8,21 | actual 292:5 | addresses 37:22 | advises 338:2 |
| Academy 157:10 | achieve 161:19 | 333:21 355:2,20 | 43:2 54:10 231:10 | advisor 173:4 |
| accelerate 225:15 | 334:9 363:3,19 | acutely 116:15 | addressing 41:9 | advisors 173:8 |
| accelerated 109:4 | 367:22 387:7 | ad 3:16,20 6:7 7:20 | 74:7 133:19 | advisory 2:14 |
| 117:7 | achieved 109:20 | 8:19 10:16 12:7 | 182:12 234:1,3 | 11:18 15:10 |
| accept 24:7 38:16 | achieves 97:5 | 12:15,16 13:6 | 316:2 326:18 | 337:22 338:5,6 |
| 193:7 290:19 | acid 178:1 235:8 | 14:12 75:18 | adequate 59:8 | advocate 167:15 |
| | acknowledged | 319:16 320:14,22 | 146:9 214:21 | 352:19 |

| | | | | |
|----------------------------|-----------------------------|---------------------------|--------------------------|--------------------------|
| advocated 347:19 | 160:11 209:12 | 137:5,16 195:7 | 322:3 340:18 | 88:14 89:8 92:3 |
| advocating 126:2 | 211:3 218:1 | 202:10 282:9,14 | 362:10 373:22 | 97:2 101:5 108:10 |
| affairs 138:18 | 244:20 326:13 | 283:16 300:2 | 375:5 396:4 | 108:13 113:13 |
| affect 62:13,17 | 369:3 395:18 | 337:13 | allowance 47:19 | 116:12 117:6,18 |
| 167:17 321:10 | agree 72:4 77:5 | aid 285:21 287:2 | 139:1 311:14 | 117:20 118:3 |
| 325:9 | 116:17 159:7 | 302:7 | allowances 140:5 | 121:20 145:18,19 |
| affidavit 294:9,18 | 227:9 243:3 | aids 75:14,17 | allowed 42:18,21 | 180:6,10 186:10 |
| 294:20 373:16,19 | 247:16 286:19 | 284:13,14 285:14 | 44:7 47:4 48:6 | 209:7,11,13,21 |
| affidavits 294:14 | 300:1,7,16,17 | 286:1,12 287:7,10 | 61:14,15 71:22 | 214:16 220:5 |
| 374:19 | 304:22 305:2,14 | 288:1,6 302:5 | 75:3 108:12 128:9 | 221:5 227:3 |
| affirm 301:16 | 310:15 395:4 | 306:1,5,6,8 370:7 | 128:10 134:12 | 240:15 245:11 |
| afford 71:16 | agreed 259:6 | 370:19 371:2,6,8 | 139:8 173:12,21 | 246:3,8,10 249:15 |
| 245:14 | 291:21 292:3 | 371:10,13,17 | 176:20 208:1,21 | 253:21 256:10 |
| affordable 54:20 | 308:8 | 373:20 378:12 | 228:18,18 229:21 | 338:12,14 339:17 |
| 54:22 95:20 233:3 | agreement 19:11 | 379:2,8,22 380:6 | 235:9 238:9 | 350:6 352:4 |
| 233:10 | 23:3 299:13 348:2 | 381:2 | 245:17 253:13 | altogether 78:3 |
| afraid 384:19 | 375:4 | air 17:20 168:14 | 293:16 298:6 | 195:2 |
| African-American | agreements 75:10 | 187:6 269:20,21 | 311:16 312:15 | aluminum 302:16 |
| 386:14 | 375:18 | 288:9 333:13,13 | 341:7,8 350:11 | amazing 35:16 |
| afternoon 137:18 | agrees 116:9 | 388:7 | 370:16 373:19 | 124:13 281:19 |
| 173:3 205:6 206:4 | 144:21 227:20 | airflow 194:18,21 | 374:4 392:20 | amazingly 246:10 |
| 237:9 244:1 277:9 | 239:5 344:3 | 269:18 | allowing 68:12 | ambitious 333:17 |
| 282:20 304:14 | agricultural 36:18 | alar 170:8,11 | 102:10 146:8 | ambivalent 203:21 |
| 310:2 320:13 | 42:5 79:9 81:19 | Albert 160:7,8 | 230:10 238:22 | amendments 19:1 |
| 373:2 377:6,11 | 146:5 147:12 | 161:1 163:20 | 241:17 374:18 | 286:13 |
| 381:7 | 207:11 266:18 | 384:15 | 389:12 | America 157:1 |
| ag 6:16 72:19 | 293:9 312:13 | alert 242:20 | allows 33:6 88:21 | 255:15 |
| 221:11 233:12 | 338:4 | alerts 242:16 | 206:19 285:10 | American 157:10 |
| age 32:6 244:12 | agricultural/non-... | alfalfa 162:12 | 296:13 311:1 | America's 361:12 |
| agencies 34:9 37:5 | 44:1 | align 313:2 | 374:5 | Amha 143:20 |
| 41:17 66:5 184:12 | agriculture 1:1,1 | aligned 49:1 91:20 | alluded 201:1 | 150:5,6,10 |
| agency 86:18 | 8:5,14 10:18 | Alimentarius | all's 5:2,5 | amount 32:11 63:7 |
| agenda 4:6 18:22 | 13:21 31:18 32:10 | 106:20 | Almar 97:21 | 101:1 130:10 |
| 19:2,4 20:1 21:17 | 32:15,21 33:2 | alive 269:10 | alternative 79:12 | 131:3 158:11 |
| 68:22 69:11 70:13 | 35:14,18 43:10 | alleviate 294:9 | 87:11 88:22 | 212:1 214:21 |
| 70:14 74:8 80:13 | 49:20 50:6,8 | 313:3 | 100:11 113:18,19 | 224:5,18 251:7 |
| 137:9 160:14 | 64:20 69:4 105:22 | alliance 78:19 | 116:18,21 117:2 | 254:2 302:12 |
| 294:6 356:9 | 119:17 125:21 | 231:2 233:11 | 119:13 121:12,13 | 346:22 394:12 |
| agent 42:19 275:5 | 166:11 168:13 | Alliance's 231:5 | 123:10 130:2 | amounts 82:5 |
| agents 34:4,16 56:4 | 174:6,7 178:18,19 | allocations 140:8 | 146:17 151:5 | ample 279:3 |
| 58:18 63:4 112:6 | 197:12 210:6 | allotted 304:3 | 197:11 199:4 | AMS 1:1 156:16 |
| aggregate 309:9 | 223:6 229:18 | allow 77:3 88:4 | 203:16 214:4 | Amy 160:12 205:14 |
| aggressive 4:6 | 338:3,7 343:5 | 89:22 113:16 | 245:12 261:22 | Amy's 253:7 254:1 |
| 359:13 | agronomic 97:17 | 129:2,14 145:17 | 338:18 374:13 | 254:15,19 255:17 |
| aggressively 68:11 | agronomists 173:7 | 162:21 172:3 | 380:11,12 | 256:7,12 |
| ago 18:8 70:7 124:5 | Ag's 11:18 | 279:10 305:1 | alternatives 77:5 | analogous 44:9 |
| 128:18 143:12 | ahead 4:5 120:14 | 315:6 321:18 | 87:3,14,17,17 | 111:20 |

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| analysis 46:12 164:22 198:13 199:14 201:5,16 349:14 | 102:2 215:14 299:4 | 196:16 206:10,19 207:7 210:2,6 212:1 216:5,16 218:9 220:2 221:15,18 222:17 223:2,5 224:2,16 224:19 225:7,12 225:16 234:21 238:4,9,12,15 239:4 242:21 245:5 257:12,16 258:8,10,16 259:19 260:10,14 262:7 264:15 265:10 276:6 323:4 338:14 339:20 350:12 351:12 372:10 383:9 385:20 392:22 393:19 | 88:3 91:7 92:15 92:20 93:11 100:7 100:14 103:22 104:2 110:8 119:4 131:2 141:13 145:14 170:6,11 207:8 234:19 238:1 239:1 244:13 250:2,8,9 250:15 251:6,12 251:17 260:19 275:1 306:20 359:10 372:11 | 364:5 applies 298:13 apply 95:18 147:2 158:1,3 190:10 192:5,9 279:9 380:7 applying 225:16 appointed 38:3 69:4 289:3 appointments 38:18 appreciate 16:12 16:17 20:8 48:1 66:3,11 78:11 83:5 84:3 95:9 110:7 125:13 131:7 133:18 135:3 142:17 163:16 202:15 253:14 267:19 309:21 332:16 335:12 377:1 386:15 389:4 396:18,20 appreciated 261:15 approach 19:8 74:15 79:22 95:17 96:11,14 98:9,20 104:13 107:14 109:22 145:14 180:16,18,21 181:18 183:21 184:1 190:13 191:17 192:1,9 228:16 235:3 260:4 299:22 318:7,14 320:20 328:12 359:16 appropriate 40:21 88:11 92:19 97:4 97:11 101:10 152:22 209:2 226:16 295:2,8 325:7 374:17 approval 19:4 49:7 72:7 approve 24:7,11 |
| analytics 350:22 analyzes 333:21 anchor 227:12 ancient 272:20 ancillary 48:5 and/or 89:16 90:4 146:16 151:11 203:3,4 376:10 anecdotal 139:20 Angie 277:4 angry 392:5,7 393:4,5,9 animal 10:17 11:5 32:16 69:17 157:13 159:13 216:13,17 278:19 animals 9:2 72:2 210:7 216:4 232:20 306:11 Ann 206:2 230:21 231:2 235:16 annex 112:1,8 anniversary 15:13 annotated 90:7 annotation 47:17 48:17 82:16 89:18 176:11 311:9,12 annotations 120:1 200:15 announced 40:1 annual 42:11 44:19 62:3,20 146:16 189:17 263:1 277:16 340:13 answer 60:12,20 148:19 173:9 203:4 209:4 219:21 245:6,7 273:22 299:3 308:17 351:17 352:5 384:3 389:17,18 answered 101:20 | answering 244:8,9 answers 152:16 280:5 335:6 Anthony 277:5 304:10 356:6 372:22 377:2,6 antibiotic 80:21 81:1 102:11 103:16 110:19,21 114:13 117:11 123:5,12 154:5,11 154:22 158:17 159:20,21 170:1 186:18 188:8 196:12,21 197:2,4 197:11 199:4 203:18 210:8 212:5 215:19 216:6,8 217:1,4 217:11 218:3 223:1,5 224:1 225:19 226:5,8 230:8 235:4 237:14 251:8,18 263:7,19 350:6 antibiotics 81:11 81:13,18,21 82:4 82:8,10 84:15,20 88:2 89:4 91:6,19 96:17 104:3,11 106:2 108:8,12 109:20 110:11,13 111:2,5 114:22 116:9,17 118:2,6 119:16 123:21 124:3,8 125:19 127:20 134:3,6,8 134:11,15 135:2 141:5,8 142:22 147:10 154:8 155:10,19 157:12 169:8,13,21 170:15 179:20 180:5 181:17 182:8 194:2,12 | anticipating 337:4 Antolos 94:17 anxious 20:14 anybody 155:16 185:22 202:14 267:8 274:4 283:3 331:13 342:8 366:4 anymore 245:19 384:21,22 393:1 anyone's 319:12 anyway 251:16 294:1 327:7 apathy 97:18 apiculture 51:3 178:21 apologetic 28:17 Apologies 307:4 apologize 147:15 307:7 apparently 86:4 172:5 280:15 appear 190:6 appears 81:4 111:7 139:1 152:5 356:13 376:9 apple 32:13 87:3,4 | 88:3 91:7 92:15 92:20 93:11 100:7 100:14 103:22 104:2 110:8 119:4 131:2 141:13 145:14 170:6,11 207:8 234:19 238:1 239:1 244:13 250:2,8,9 250:15 251:6,12 251:17 260:19 275:1 306:20 359:10 372:11 apples 7:14 11:12 81:22 97:2 103:8 103:19 108:7 111:10 130:11,19 131:5,13 132:10 154:18 155:4,21 169:13 170:9 206:10 213:3 215:19 218:3,10 218:12 219:18 221:18 225:7 244:12,17 245:5 245:13,15,15 249:18 250:16,19 252:2,18,20 257:14 258:9 259:12 269:1,2,4 271:17,21 272:5,5 272:10 392:22 apple-eating 197:18 application 62:10 104:14 105:8 236:5 266:6 315:14 340:13 applications 102:11 104:16 105:6 236:13 263:16 340:7 applicator 173:5 applied 103:1 152:11 171:4 235:19 295:12 306:9 340:11 | |

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 111:19 229:1 | articles 312:5 335:13 | 287:12 | 249:10 263:15 265:21 266:2,10 | aye 24:19 25:4 |
| approved 139:14 140:1 147:5 255:14 297:9 370:12 | articulate 354:16 | association 77:15 116:3 133:2 135:7 144:4 162:3 277:12 337:20,21 | Austria 109:17 | eyes 24:20 25:5 |
| April 1:8 37:1 212:15 364:6 | artificial 97:15 | assume 103:12,12 111:20 | authored 68:6 | A&M 12:1,4 |
| aquaculture 41:5,7 41:17,19 51:3 69:13 151:11 230:8 | Artigus 86:7 | assumed 141:2 289:8 290:20 | authorities 112:7 | A-F-T-E-R-N-O-... 205:1 |
| aquatic 286:14 288:3 | asexual 362:2 | assumption 108:18 200:15 | authority 301:10 303:8 356:18 | a-vis 346:2 |
| archived 58:11 | Ashmead's 272:19 | assurance 185:1,12 185:20,22 | authorizes 305:4 | a.m 1:10 4:2 136:17,18 204:21 |
| arduous 311:10 | Asia 255:16 | assurances 81:17 185:20,22 | authors 68:2 | <hr/> B <hr/> |
| area 28:8 72:10 196:17 203:20 257:6 266:17 352:15 368:9 385:2 | Asian 100:15 | assure 78:20 167:20 254:17 | autism 8:6 153:18 | B 116:22 |
| areas 24:3 50:12 51:11,17 55:6 92:14 105:2,18 106:13 149:3 230:13 232:18 321:1 330:18 332:8 338:1 348:21 393:10 | aside 309:15 313:18 | ASTA 344:20 | automatically 93:17 381:4 | bacillus 112:3 |
| arena 34:8 | askance 274:7 | attainable 54:21 55:8 95:21 233:3 233:8 | Auvil 268:22 | back 23:13 28:12 30:21 45:18 52:10 68:20,21 76:5 85:14,20 99:4 108:3 111:14 113:14 115:10,16 119:1 128:20 130:3 137:3 138:3 138:4,5 139:8 158:11,20 181:11 195:16 198:12 202:8 205:14,21 214:14 234:14 246:21 249:16 250:9,16,18 262:6 270:7 271:5 272:12 281:1 282:21 283:2,4,10 283:15,21 285:6 289:15 294:2 295:17 296:5 301:2,17 303:16 304:7 307:8 308:11 309:5 316:22 319:12 329:20 335:5,7 336:5 337:14 342:4 355:18 368:20 381:4 396:15 |
| argue 199:13 | asked 17:2,5 93:22 125:14 166:3 205:9 207:4 236:5 248:3 273:21 276:5 335:3 371:9 373:13 375:2 383:18,19 | attends 51:4 | availability 42:14 42:16 116:22 121:16 253:19 350:5 | available 42:7 45:12 55:5,7 61:10,13 71:19 76:20 87:3,12,18 89:9 125:22 132:9 139:21 145:21 146:2 205:8,10 240:15 257:16 327:15,19 337:13 339:3,7,14,18 340:2,3 379:1 |
| argued 140:3 | asking 139:22 146:14 152:3 215:9,18 238:18 312:21 372:14 374:19 386:22 389:11 | attendance 72:15 69:15 70:5 167:6 189:18 255:3 282:5 | available 42:7 45:12 55:5,7 61:10,13 71:19 76:20 87:3,12,18 89:9 125:22 132:9 139:21 145:21 146:2 205:8,10 240:15 257:16 327:15,19 337:13 339:3,7,14,18 340:2,3 379:1 | Avenue 1:12 |
| arguing 197:2 | asks 107:15 300:14 334:5 | audience 4:15 16:15 21:5 351:5 396:19,19 397:1 | average 236:14 340:22 | avoid 53:19 54:1,12 67:18 75:12 238:12,20 |
| argument 52:14 83:8 | aspect 21:8 195:13 | auditors 58:16,16 58:21 59:2 | avoidance 251:22 353:17 | avoiding 346:10 |
| arguments 141:10 | assessing 38:13 280:3 | audits 53:8 58:21 63:14 | await 153:2 | awaited 308:13 |
| arid 175:9 | assessment 46:11 157:18 158:4 301:5 305:7 309:4 309:5 | aureobasidium 109:16 | aware 92:17 109:1 116:15 131:18 132:3 327:2 350:8 368:4,12 | awful 188:12 244:12 |
| arises 152:10 | assessments 278:20 | Austin 1:15 9:6 11:9,10 104:9 109:9 128:17 129:13 130:17 176:15 177:12 189:20 192:4 222:14 243:12,16 | awful 188:12 244:12 | awkward 289:4 |
| arounds 53:22 | assign 298:15 | | | |
| arrangement 51:21 | assigned 296:15 | | | |
| arrived 127:18 213:21 | assistance 59:10,16 60:6,17 61:8,14 297:1 | | | |
| Arsenault 2:14 15:7,8 21:10 205:18 | assistants 55:4 | | | |
| arsenic 254:11,22 255:5,21 | assisting 233:13 | | | |
| article 174:7 254:9 | assists 153:17 | | | |
| | associated 133:7,9 185:9 266:19 290:2 298:11 | | | |
| | Associates 6:21 | | | |

| | | | | |
|----------------------------|----------------------------|----------------------------|---------------------------|----------------------------|
| 381:15 | based 5:1 6:21 20:1 | beautiful 25:15 | 333:8 337:10 | Bialic 105:15 |
| back-up 114:11 | 36:22 72:1,3 | 26:14 269:11 | 359:9 364:16 | 136:14 138:13,15 |
| bacteria 156:18,19 | 102:4,6,16 104:18 | Beauveria 112:3 | 365:19 368:15 | 138:17 142:3 |
| 157:8 212:18 | 121:16 123:7 | Beck 1:16 6:19,20 | 388:15 394:20,20 | 143:3,17 |
| 223:13,16,19,20 | 134:16,20 150:14 | 175:18 | believed 291:16 | biannual 24:12 |
| 224:8 225:18 | 150:15,21 154:5 | becoming 347:2 | 393:8 | bid 305:5 |
| 226:4 238:6 | 157:18 169:15 | 393:9 | believes 146:4 | big 28:7 72:19 |
| 265:11 | 191:21 192:1 | bedrock 241:5 | 148:7 239:14 | 121:11 122:2 |
| bacterial 133:8 | 193:21 199:18 | beep 21:12 | 301:9 320:16 | 184:2 194:8 196:4 |
| 224:7 | 213:3 224:5 231:3 | bees 17:16,18 194:5 | 375:6 | 271:13 |
| bactericides 115:2 | 235:2 237:3 | 240:10 | bell 127:8 128:17 | bill 17:20 35:7 |
| bad 82:6 93:18 | 240:22 253:8 | beet 240:1,1,9,17 | belong 84:21 141:9 | 123:22 |
| 96:20 101:21 | 266:12 301:11 | 241:2 384:21 | 243:19 334:3 | billion 34:11 35:3 |
| 115:1,9 202:14 | 308:14,16 310:6 | beets 240:4,7,20 | belonging 190:3 | 232:5 255:7 |
| 341:3 390:12 | 334:19 378:9 | 385:1,3 | belongs 293:11 | binding 96:5 |
| 396:12 | baseline 90:20 | began 37:1 143:11 | benchmark 239:11 | biodiverse 234:22 |
| bag 26:10 349:7 | basic 54:1 190:6 | 214:10 | beneficial 240:11 | biodiversity 31:19 |
| Bailey 2:16 14:2,3 | 348:21 357:3 | beginning 33:1 | 388:6 | 51:15 64:15 231:7 |
| Baker 94:20 | basically 44:9 | 40:4 180:4 181:21 | benefit 39:7,9,21 | 231:15 232:7 |
| 105:14,17 109:15 | 60:13 98:14 | 271:5 384:1 | 101:5 357:15,17 | 233:4,6 234:4,8 |
| 110:22 111:21 | 126:12 142:11 | behalf 16:6 35:17 | 358:17 | 265:8 270:13 |
| 113:6 114:19 | 211:8 236:11 | 39:5 66:1 105:20 | benefits 39:12 | 297:13 388:6 |
| 304:6 355:22 | 298:21 301:1 | 133:11 139:3 | 102:14,17 103:17 | biological 64:16 |
| 361:6 369:20,22 | 315:5 | 253:11 279:12 | 176:22 181:15 | 111:22 124:22 |
| 370:1 | basics 49:22 | 356:3 | 375:9 | 125:10 147:3 |
| balance 78:4,5 | basis 14:14 62:3 | Behar 172:22 | benefitted 197:8 | 188:4 189:5 |
| 132:15 158:7 | 69:22 104:16 | 178:15,15 182:22 | best 96:20 101:21 | 190:22 257:18 |
| 228:13 268:10 | 190:3 235:19 | 183:22 185:21 | 101:22 109:5 | biologically 171:3 |
| 278:19 | 236:21 237:2 | 187:18 188:17 | 203:13 255:2 | 178:4 |
| balanced 246:16 | 284:22 285:8 | 190:16 192:15 | 342:18 363:9 | biology 390:20 |
| 247:3,7 251:9 | 340:13 353:2 | 194:15 | 369:11 394:14 | biotech 45:6 |
| 366:15 | 365:16 | behaviors 202:22 | betrayal 68:15 | biotechnologies |
| balancing 63:9 | basketball 25:12 | Belay 143:20 150:5 | betrayed 392:1,5,6 | 107:15 |
| 95:22 228:8 | bassiana 112:4 | 150:7,10 153:7 | better 21:4 46:7,8 | bird 17:18 |
| 251:10 | batch 83:19 | beliefs 190:6 | 50:5 53:9 80:5 | birds 70:9 240:11 |
| ballot 381:22 382:6 | Batcha 337:15,18 | believe 24:14 73:10 | 120:19 174:14 | bit 5:14 20:6 22:19 |
| ban 259:18 365:1 | 337:19 342:21 | 75:12 81:6 91:17 | 182:20 200:18 | 27:12 34:18 54:9 |
| barely 245:14 | 345:16 350:11 | 91:19,21 98:1 | 204:2,10,12 | 63:16 130:21 |
| barraged 258:13 | 351:8 353:3 | 101:19 120:15 | 232:12 233:13 | 137:9 182:1 |
| barrier 56:21 | 354:12 355:15 | 127:17 134:4 | 254:22 270:9 | 192:17 193:20 |
| 202:1 | Baton 10:19 | 140:2 142:12 | 325:11 388:3 | 202:16,17 210:15 |
| barriers 55:18 | battle 81:5 | 145:2,11 148:16 | 392:10 | 213:8 215:3 |
| 60:22 75:21 95:12 | Baumgartner | 162:19 163:1 | beyond 7:22 77:2 | 268:13 284:1 |
| 99:13,16,16,20 | 206:2 231:1,2 | 181:17 196:20 | 126:3 167:16 | 286:3 324:16 |
| 285:16 | 235:22 236:3,22 | 218:7 221:10 | 168:9 287:22 | 340:7 341:7,9 |
| base 104:10 193:6 | bearing 355:12 | 228:21 248:2 | 297:5 300:4 | 342:15 345:14 |
| 256:2 | Beauties 273:2 | 249:12 300:8,10 | 342:15 345:4 | 350:17 354:3 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 365:16 382:20 391:12 396:6 bits 217:2,3 black 234:3 blanche 104:15 bleeding 230:13 blight 77:4 81:22 89:1 92:20 104:4 104:12 109:13 114:20 117:21 123:5 127:18 130:22 145:14 146:2,18 148:10 154:20 155:6,20 182:11 183:1,19 188:9 190:11 193:3,11 214:5,6 224:11 236:18 237:22 246:4 257:12,16 259:20 260:4,17,20 262:6 262:15 263:20 264:3,11 267:10 267:13 268:2,8 269:6 271:8 275:13,15,17,19 275:20,21 339:16 341:2,3 350:9 blight-resistant 148:4 blind 170:6 Bloc 67:13 block 221:14 blocks 194:22 269:17 353:7 blogs 258:11 bloom 94:6 103:1 237:4 260:12 270:4 blossom 17:20 109:16 122:6 123:21 125:6 192:21 252:4 261:19 262:2 263:9 338:22 339:1 blue 54:7 | blueberries 11:13 board 1:5,10 2:14 4:11 5:7,12 9:8,20 10:9 11:2,18 12:8 13:8,17,19 14:8 15:4,9,10 16:15 18:13,18,21 19:1 19:6,20 20:5,12 21:17,18 22:8,15 22:16 23:2,4,7,11 23:12 24:11 28:4 31:13 37:13,18,21 38:5,10,16,17,21 39:4,11 40:10,14 41:3 47:8,11 48:9 48:14,16 49:10 56:7 64:11 68:14 69:11,14,15 70:3 85:9 87:13 97:22 101:8,16 102:4 112:17,22 115:17 132:14 136:12,19 144:1,11 148:13 156:8,9 158:5 166:9,12 167:17 168:8,10 169:4 171:9 172:8 185:1 185:3 195:10 198:5,17 199:15 199:18 200:4 201:3,3 205:4 206:15 228:6,12 230:14 236:6 238:8 239:3,18 242:8 251:2 253:15 277:11 278:10 283:14 285:7 289:3 302:1 303:8 307:10,13 320:16 345:21,22 354:16 356:16,18 357:9,11,19,22 358:3,5,8,10,13 359:9,15 376:14 382:3 388:2,10 394:18,22 395:12 395:22 397:2 | boards 36:3 85:6 198:10 board's 201:4 Bob 153:9 154:2 155:7 156:4 159:3 160:3 217:8 body 195:20 203:20 204:3 237:13 311:20,21 317:19 318:8 375:9 boiler 145:5 boiling 8:22 bold 285:14 bonafide 244:18 Bondera 1:17 5:17 5:20 193:18 202:12 215:1 324:8 Bonnie 52:8 books 129:15 boots 260:22 boss 69:10 bosses 139:22 bother 279:1 bottlenecks 200:9 Boutard 304:6,11 355:21 356:1,2 360:8,15,20 361:4 372:22 377:3,5,7 bouts 169:22 bow 78:3 box 244:11 250:9 341:21 boxes 245:19 Bozena 178:12 Brady 253:5 256:22 257:3 261:6,8 263:15 brain 4:14 202:17 247:22 273:3 brainer 125:17 brand 75:8 90:12 172:16 197:5 254:6 324:20 breached 376:6 bread s 252:19 | break 115:14,17 183:12 195:15 202:8,13 204:18 282:11 283:7,8 breakers 74:17 breakfast 361:13 breath 134:1 breed 27:14 breeding 239:15 breeds 367:10 Brian 94:19,20,21 94:22 105:14 109:8,9 110:6 112:15 114:7 bridge 16:1 80:6 brief 304:16 361:20 briefed 37:8 briefly 47:1 325:19 326:5 330:8 Brighton 277:5 Brines 2:18 14:22 15:1 289:11 bring 22:14 79:17 80:6 144:22 175:22 176:22 185:22 250:15 260:8 262:22 301:2,17 bringing 131:8 388:17 brings 77:21 79:3 117:12 140:9 British 108:6 broad 61:8 196:15 223:3 302:6,22 361:18 broader 286:4 303:3 broke 244:22 broken 178:4 203:14 214:18 brothers 66:1 brought 288:18 335:13 bruised 250:10 bud 268:21 buddy 154:3 | 172:19 budget 34:19,22 budgetary 18:4 budgets 71:12 buffer 348:18 bugs 223:9 build 94:6 building 57:12 64:16 buildup 183:3,10 built 197:5 200:21 265:19 267:6 bullet 109:22 170:16 bummer 35:9 bunch 15:15 394:1 Bunin 230:22 237:7,9,10 242:7 242:12,15 243:14 243:17 burden 51:22 53:13 55:20 62:21 71:15 72:16 114:1 163:12 196:5 burdens 65:1,4 88:15 355:5 burdensome 52:18 53:4 54:9 64:22 347:11 bureaucratic 56:17 bureaucratic 56:14 burn 175:20 burnout 35:22 business 46:11 49:3 55:16 75:1 94:3 152:20 241:18 266:21 284:11 288:15 289:18 295:8 305:20 325:10 357:1 358:20,21 373:7 377:15 381:20 businesses 55:19 56:21 65:1,5 79:9 312:7 384:19 busy 382:4 393:12 Bute 385:2 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-----------------------------|---------------------------|---------------------------|----------------------------|-----------------------------|
| butter 161:5 | 371:17 374:8 | cares 153:16 | 370:21 371:10 | 60:1 345:4 |
| button 120:22 | 395:21 | 386:20 | cattle 165:8,11 | certification 7:2,5 |
| buy 5:9 33:16 | calls 14:15 15:19 | Carmela 1:16 6:20 | cause 249:6 | 7:12 9:13,17 |
| 172:11 212:10 | 15:19 143:5 | 175:18 | caused 172:11 | 10:15 33:3,6 |
| 220:15 241:6 | 208:22 267:11 | Carmen 86:7 | causing 364:18 | 34:13 35:8 51:22 |
| 244:12 249:19 | Calvin 1:23 3:5 | Carol 175:15 304:5 | caution 113:11 | 52:10,13,15 53:7 |
| 252:15,17,17,19 | 10:14 24:6 25:7 | 304:6 355:21 | CBI 75:3,5 241:9 | 53:14,19 54:16,20 |
| 271:15 272:16 | 101:18 141:20 | 356:2 | 241:14,14 290:19 | 55:18 56:10,11 |
| 322:21 383:20 | 242:6 345:10 | carrageenan | 290:21 292:1 | 58:19 59:11,22 |
| 384:5,7,11 387:11 | Cam 71:2,3,6 73:7 | 139:12,19 140:4 | 293:13 295:9,18 | 60:3 61:1 62:2 |
| 392:11 | 73:21 | 358:3 | 373:16 375:6 | 63:8,21 66:2,5 |
| buying 26:10 79:7 | campaign 216:4 | carried 140:6 | CCOF 95:5 102:16 | 86:15 95:5,5,12 |
| 80:11 238:20 | 258:2 383:19 | carriers 286:9 | 300:17 | 96:13 98:6 99:11 |
| 254:15 353:10 | campaigning 382:5 | 311:14 | celebrated 15:13 | 112:6 114:15 |
| 384:22 | campaigns 272:15 | carry 72:20 216:6 | celebration 25:22 | 115:6 130:15 |
| Bynum 337:15 | Canada 43:10 | 324:18 326:2 | 26:3 | 146:7 147:6 151:8 |
| | 110:9 350:7,8,19 | 379:14,17 380:21 | cell 5:7,8 43:4,9 | 152:12 163:2,11 |
| C | 369:2,6,18 | carrying 308:8 | census 352:14 | 187:9 189:1,17 |
| C 281:8 | Canadian 335:19 | carryover 154:10 | center 211:5,10 | 196:2 233:2 |
| CACS 6:13 10:3,11 | 369:9 | carte 104:14 | 217:9 237:11 | 277:14,21 278:12 |
| 11:20 77:20 95:10 | cancel 357:6 | case 62:8 69:19 | 242:9,21 | 280:1 317:19 |
| 96:1 | cancer 8:7 | 70:4 90:17 109:1 | central 81:1 270:16 | 370:10 |
| calculate 228:13 | canned 250:5 | 113:10 242:20 | centrist 186:4 | certifications |
| calculating 77:20 | canola 369:14,18 | 292:3 294:7 | century-old 268:16 | 294:16 |
| 310:7 313:12,14 | capable 69:8 | 295:13 304:8 | CEO 358:1 | certified 7:10 11:6 |
| 317:1 | 247:15 280:2 | 338:20 | cereal 361:13 | 11:16 34:4 42:9 |
| calculation 96:7 | capacity 108:15 | cases 57:18 224:1 | certain 23:1 67:6 | 46:2,5,15 54:2 |
| 319:4 | capriciously | 259:19 291:9 | 105:1,2,3,6,7 | 62:21 86:16 92:12 |
| calculations 96:2 | 173:17 | 293:7 298:13 | 107:20 113:21 | 94:3 98:11 127:10 |
| 278:18,19 317:20 | capture 57:3 121:7 | 372:6 | 182:12 200:7 | 161:4,8,10,12 |
| 318:3 | 127:11 | cash 111:10 | 224:1 229:8 230:3 | 162:5,10 255:14 |
| calendar 235:2,19 | captured 288:11 | cashing 30:15 | 252:13 258:3 | 259:10 266:5,13 |
| 236:21 237:2 | carbon 176:21 | casual 111:12 | 272:16 298:2 | 266:16 267:15 |
| California 6:22 7:9 | 177:7 314:6 | catastrophic | 353:6 367:17 | 274:10 311:22 |
| 7:10 9:21 70:7 | carcinogens 169:14 | 117:19 | 372:7 375:13 | 312:7 322:6,21 |
| 97:3,7 131:17 | card 381:20 | catch 108:13 | 377:18 389:19 | 356:7 361:12 |
| 132:8 150:15 | care 11:5 27:7 | 202:11 | certainly 32:8 | 377:7 384:5,8 |
| 161:2 173:4 231:3 | 35:14,21 107:13 | catchall 370:19 | 91:18 155:14 | 390:14 |
| 232:3 253:8 | 215:22 219:7 | categorically 90:8 | 167:17 177:8 | certifier 10:8 44:19 |
| 381:20,22 382:11 | 311:20,21 313:1 | 292:2 | 200:3 201:17 | 61:15 62:6,9,11 |
| 393:10 | 317:20 318:8 | categories 151:20 | 203:11 212:8 | 74:5 78:12 95:8 |
| California's 7:12 | 387:14 | 285:12 286:18 | 240:12 259:11 | 98:7 108:2 148:18 |
| call 3:2 15:20,20,21 | careful 35:20 | 299:6 305:9 | 284:2 353:3 | 175:5 189:12 |
| 15:22 210:19 | 273:21 370:15 | 370:15,18 | 386:21 | 277:22 278:4 |
| 383:5 390:7 | 380:13 | category 85:18 | certificate 221:12 | 281:2 312:17 |
| called 168:19 205:8 | carefully 312:8 | 112:5 287:5 | 344:13 347:15 | 314:13 348:11 |
| 319:13 343:12 | 359:18 | 298:16 303:5,9,11 | certificates 59:12 | 369:17 |

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| certifiers 34:9 44:22 45:12,19 47:21 53:11 55:4 56:2 57:22 58:4 59:9 60:4,7,9 63:3 63:14 64:1 75:7 75:21 77:14 89:4 90:1,9 96:5 103:3 111:19 144:3 146:15,19 148:7 149:15 152:3 187:22 188:6 231:9 234:8 294:12 312:8,19 313:3 318:6 325:15 348:9 349:15 | 70:19 73:6,20 74:1 78:10 83:4 84:1 85:10 91:2 92:10 93:9 94:9 94:13 99:1 100:3 101:18 102:7 104:7 105:9,13 109:7 110:5 111:15 112:14 114:5 115:13 120:20 121:4 122:21 127:15 128:16 132:11 136:8,12,19 138:14 141:19 142:15 143:15,18 147:17,21 149:10 150:4 153:4,8 154:1 155:7 156:3 159:2 160:3 163:18 165:5 166:2,5 168:3 172:18 176:13 178:10 182:5 184:4 188:10 189:19 193:16 195:5 199:6 202:5 204:13,16 205:3 205:19 210:11 211:17 214:22 217:20 222:13 224:14 228:2 230:16,19 235:15 236:9 237:6 242:5 243:11,20 247:8 249:9 250:22 253:1,4 256:20 261:6 263:14 267:17 273:8 276:21 277:3 280:13 282:3,7 283:14 301:22 303:21 307:2 309:19 314:9 315:11,21 316:21 319:8,11,20 320:4 320:7,11 337:9 | 342:10 345:10 350:2,20 352:17 355:13,16 360:3 361:2,5 365:4 369:19 372:20 376:13,20 377:2 381:9 386:1 391:7 395:7,10,16 challenge 78:5 87:22 174:6 challenges 76:12 141:3 175:15 344:7 359:22 challenging 120:14 139:5 276:14,16 342:6 345:2 championship 25:12 chance 51:8 156:10 256:17 337:1 349:8 353:12 384:6 387:4 chances 367:16,19 368:10 change 62:13 125:18 141:10,14 188:14 249:15 334:11 341:13 361:21 changed 18:7 57:17 308:10 311:10 357:13 changes 48:17 62:16 167:15 201:6 277:19 313:16 changing 76:13 260:22 characteristic 110:20 characteristics 110:17 characterization 248:17 characterize 273:17 chard 384:17,18,22 | charge 15:8 charitable 359:5 Charlotte 360:11 chart 54:5 384:15 cheated 222:3 check 30:19 232:10 283:21 319:14 checkered 198:16 checking 74:16 205:13 280:21 281:8,17,17 300:1 checklist 149:22 231:9 280:16 297:15 299:5 cheesewax 286:22 chemical 8:5 72:9 287:18 288:3,8 387:20 chemically 171:3 240:2 chemicals 91:16 171:13 266:20 322:3 371:14 383:11 cherries 11:13 chicken 27:11,13 27:14 29:4 chickens 28:8 29:12,18 Chico 381:19 chief 95:4 150:11 381:21 children 32:9 262:19,20 Chilean 151:1 China 67:13 choice 141:13 249:17 choices 200:19 choose 33:8,11 103:13 322:21 349:17 choosing 349:5 Chorus 24:20 25:5 chose 210:18 chosen 227:6 Christine 304:10 | 369:20 372:22 373:3 chronic 153:17 circle 66:20 circulation 187:6 circumstances 240:14 260:6 262:13 373:18 circus 98:3 citation 157:7 cite 327:10 329:12 citing 74:21 citizen 85:18 356:5 370:4 373:5 civil 376:4 claim 33:8 80:2 312:12,16 claimed 241:14 claims 33:6 81:9 311:21 312:9,12 clarification 47:18 75:13,15 clarifications 24:19 25:3 313:17 clarifies 43:1,6 clarify 47:4 61:2 239:17 243:12 338:10 370:22 clarifying 48:4 321:4 350:4 clarity 77:21 145:7 198:11 200:16 201:8 203:11,11 239:6 286:21 300:6 class 223:2,22 classes 217:10 223:1 224:2 classification 43:14 43:17,20 44:3,15 298:19 309:4 clean 79:12 175:9 371:14 385:18 cleaners 145:3 cleaning 368:1 cleansers 285:17 clean-up 394:1 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| clear 69:2 71:9,20 75:4,10 76:6,16 77:12,18 84:19 96:16 98:8 107:8 120:2 142:7 144:14 152:19 172:1 180:11 184:15,15 198:9 198:18 204:3 240:4 290:8,11 294:4 345:20 358:7 371:2 | coincide 258:4 Colehour 1:17 5:13 5:20 193:16 214:22 215:15 319:8 324:4,7 343:22 Coleman 209:11 collaborate 374:15 collect 278:14 collected 321:17 343:21 collection 343:13 344:4 college-level 390:8 Collin 29:8,21 colluding 395:3 color 341:9 Columbia 108:6 comb 113:14 combat 81:21 246:4 combating 237:18 combination 125:8 264:8 297:7 338:19 come 13:18 15:11 20:22 23:3 26:11 42:2 56:6 90:18 101:3 108:21 115:10 124:6 129:1 159:11 181:11 183:6 184:2 195:16 199:3 200:12,18 202:8 220:3,14 235:20 248:12 249:8 255:3 271:15 272:4 276:10 283:10 285:6 293:19 304:7 306:10 309:5 327:8 330:14 335:1 336:4,6 337:6 348:11 349:13,14 374:8 382:4,10 383:5 | comes 174:3 187:1 188:21 201:5 220:18 231:8 298:17 328:18,19 350:18 comfortable 66:14 coming 18:12 33:19 50:21 81:16 81:18 130:11 131:12 143:9 201:4 210:14 221:5 249:11 251:22 277:4,16 319:5 331:6 341:2 386:4 commend 70:15 commensal 156:19 comment 3:8 4:9 4:21 19:17 22:7 43:13,14 66:17 73:9 76:21,22 86:20 94:11 100:9 105:18 106:4 128:18 137:6 138:16,21 150:8,9 156:5 190:2,12 194:9,13 209:12 224:22 256:18 282:16 294:17 295:10 302:1 303:18,19 304:5 322:16 324:12 326:4 328:10 337:11 338:1 356:10 361:11 364:2,8 370:7 373:5,17 commentary 329:10 commented 194:1 284:19 293:15 328:3 332:17 345:20 commenter 153:22 commenters 292:21 293:15 332:3 333:6 | commenting 320:10 376:17 377:13 comments 3:12,19 4:18 40:17 44:3 44:13 65:12,15 70:22 74:7 77:13 78:2 83:2,7 89:12 91:5 97:20 110:7 116:5,7,14 119:19 120:9 132:19 133:17,18,22 137:4,11 138:20 140:10 142:16 144:2,4,6,7 145:9 148:2 154:5 169:3 172:21 231:5 253:9,22 256:12 285:2 287:12,21 288:11 291:6,14 292:17 296:5 299:14,17 304:17 304:20 306:2,13 307:8 310:5 313:13,15 317:1,2 321:7,16,17 323:10,22 324:2,5 327:9 328:13 329:11 330:14 332:15 335:13 336:1,20 337:2 344:19 345:12,19 364:9 commercial 42:14 42:16 253:19 257:10,17 259:9 269:2 350:5 commercialization 101:4,16 commercially 87:18 145:20 240:15 commercially-av... 209:20 214:16 352:4 commercially-vi... 88:14 | commingling 348:19 commission 43:11 commit 136:6 commitment 146:13 227:14,18 228:1 350:1 389:6 commits 88:18 committed 117:5 136:3 145:12 347:12 committee 9:14,17 10:3 11:19,20,21 12:5,6,13,14,14 12:15,16,17 13:5 14:12 18:6 22:18 22:22 37:3 106:8 126:4 140:10 151:15 282:12 284:7 296:15,17 297:2 309:1 319:16 320:5 337:12 338:5,6 343:6 363:7 committees 5:15 6:13 11:4 282:19 337:22 Committee's 120:7 commodities 105:1 113:21 130:19 commodity 269:5,7 common 260:3 commonsense 279:4 communicate 166:10 188:14 communicated 388:9 communicating 389:16 communication 40:16 277:15 336:11,12 344:15 communications 40:15 41:2 331:3 communities 321:8 386:16 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| community 32:15 80:8 81:3 85:8 88:16,19 93:13 97:13,18,19 100:20 106:15 133:5 145:12 148:6 166:10 179:22 185:13 188:15,18 217:18 227:14 285:7 303:15 354:5,8 355:6 357:12,20 358:16 375:12 386:14,20 | complacency 118:19 complaint 70:5 complete 53:10 87:20 298:7 299:1 300:2 378:13 completed 50:2 339:9 341:14 completely 116:10 221:20 347:19 complex 53:1 57:1 120:15 compliance 7:4 9:16,22 43:3 45:2 46:9 55:1 56:22 57:7 62:13,17 63:7,22 64:7 76:17 145:1 147:8 234:17 321:5 325:16 378:4 compliant 313:6 314:15 complicated 41:12 53:4 333:12,17,21 336:18 393:21 comply 53:5,18,22 55:11 57:1 60:8 60:14 373:20 component 326:11 components 53:3 comport 206:20 209:3 230:12 comports 206:16 207:1 composition 90:16 compost 286:13 comprehensive 47:9 305:16 compromise 102:6 118:15 computer 267:9 computers 264:4 concentrate 16:7 255:5 concentrates 178:8 concentration 314:5 | concept 32:17 39:8 64:10,12 144:21 174:21 199:22 201:14 300:18 326:16 328:19 329:13 330:10 348:22 349:19 383:13 concern 102:10 103:5,6 113:2 131:7 135:4 136:5 154:7,20 158:21 159:19 177:15 212:5 228:11 312:19 327:15 346:8 386:17 concerned 67:21 71:15 117:19 139:7 155:10 157:2,11 159:15 179:13 188:22 215:9 217:17 228:9 254:12 321:13 335:20 353:15 358:18 392:11 concerning 170:8 238:3 concerns 80:19,21 116:16 133:21 136:2 138:22 141:4 142:21 155:22 156:1 160:1 210:1 251:4 253:18 255:8 256:5 321:9 382:15 concerted 234:7 conclude 119:3 126:9 concluded 133:6 concluding 142:9 conclusions 142:2 145:19 conclusive 142:8 concur 310:9 condition 239:15 | conditions 82:2 94:5 104:18 105:7 108:9 132:7 147:4 237:5 257:21 259:20 conduct 38:12 45:7 conducted 130:5 131:11 207:2 211:9 conducting 298:5 307:15 conference 15:18 15:19 242:19 conferences 132:3 188:19 confidence 57:12 78:21 130:2 222:6 360:21 375:1 382:17 confident 118:4 122:11,15 124:9 confidential 49:3 75:1 241:18 284:10 288:14 289:1,7,17 290:13 290:14 292:6,7,9 292:19 293:5 295:2,6 305:20 373:7 376:2 377:15 381:4 confidentiality 75:10 375:4,18 376:5 confirm 239:19 conflict 22:13 23:2 37:19,21 38:14 39:10,17 68:9,17 97:14 356:11,15 356:20,22 357:3,5 357:8,14,16 358:4 358:9,11 359:11 360:7,9,18 conflicts 38:1,14 39:2 357:6 confused 139:13 199:2 confusing 107:4 | 363:12,14 confusion 85:20 86:2 160:10 congratulate 171:9 congressional 248:19 conjugating 362:2 connect 49:17 conscience 168:19 consensus 100:21 106:14 consequence 212:19 consequences 107:12 212:20 235:6 344:13,16 344:21 conservation 231:10,16 233:7 234:2,9 conservationist 233:18 consider 72:14,22 76:9 87:8,13 98:19 101:22 134:18 174:18 279:21 296:6 318:10 326:22 375:16 considerable 298:4 considerate 18:12 consideration 77:1 280:11 considerations 18:4,20 considered 43:7 74:19 107:4 111:22 133:9 151:4,13,13,21 216:18 237:16 296:14 335:14 considering 104:2 186:4 378:22 384:22 considers 36:10 306:5 consistency 47:20 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 53:10 89:22 90:9 229:12,13 consistent 43:9 45:2 106:20 107:10,12 174:16 consistently 234:15 316:2 351:10 constant 22:8 97:12 constantly 80:3 383:3,18 constituents 141:16 constitutes 302:7 constrain 327:20 constrained 303:7 consultant 266:6 266:11,14,16 267:15 consulting 60:16 61:11,15 consume 218:17 consumer 8:18 12:8 57:12 78:5 79:6,14 81:5 102:9 103:18,21 113:2 132:17 133:9,12 135:6 140:3 141:3 142:9 154:7,21 159:4 184:14 185:13,15 193:6,9 206:6,17 206:20 208:7 209:3 210:4 215:6 220:1 222:6 230:12 249:16,18 251:2,3 254:9 256:2 265:16 273:6 321:8 332:15 341:14 346:6,15 353:17 370:1 372:12 374:22 consumers 8:2 33:8 33:15 47:21 67:17 78:21 80:10 81:12 81:17 127:3 136:5 142:21 146:11 | 147:12 155:3 159:6,7,19 162:16 184:7,9 197:10,18 207:3,6,18,21 208:9,13,14,20 211:7 212:9,9 215:22 217:6 218:8 219:6,10 220:2 221:7,20 222:2,9 226:22 227:7,13 228:11 233:20 241:6 244:8 245:17 247:4,14,18 248:2 248:9 252:14 254:13 259:3 271:10,18 272:14 272:16,17 322:21 332:1 341:17 346:8 371:21 391:16 consuming 103:18 133:3 163:14 consumption 350:18 contact 90:18 129:1 165:13 274:4 302:17 306:10 383:5 contacted 273:22 contain 144:14 333:2 contained 119:21 144:15 224:4 292:5 containment 329:21 contaminated 161:13 162:5 168:14 329:1 367:2 384:7,20 385:5 394:11,18 contamination 8:9 161:21 162:1,15 163:5 166:8,13,18 166:21 167:4,21 321:2,9,19 322:18 | 323:7 325:5,6,18 326:10 329:15,17 343:9,16 344:12 344:16 346:5,17 354:20 361:15 362:8,11,18,21 363:17 365:7 366:11 367:3,17 367:18,20 368:1 369:16 content 318:21 CONTENTS 3:1 context 132:18 294:14 continually 95:19 182:3 continue 89:7 94:1 146:22 197:10 218:16 221:1 329:5 354:16 368:11 383:19 continued 50:7 88:11 98:6 198:22 256:8 287:13 continues 67:20 continuing 51:17 102:14 188:22 258:21 continuity 201:8 continuous 21:7,16 55:21 64:15 80:16 199:22 342:5 348:14 363:20 continuously 108:20 162:11 continuum 216:16 contract 305:4 307:12 308:1,8,22 contractor 301:11 contractors 290:10 contracts 353:5 contrary 68:3 contribute 56:14 56:18 238:5 contributed 197:19 contributing 317:16 318:3,11 | contribution 318:18 control 73:3 77:4 92:20 100:12 104:3,13 109:13 119:7 123:5 127:21 131:1 146:1 154:20 155:20 173:4,17 174:5 176:7 180:12 181:6 183:1,15 189:22 190:1,8,11,18 192:1,6,7 214:6 238:1 257:12,16 257:19 263:20 286:16 345:5 350:9 controlled 89:3 355:7 controlling 89:1 127:20 145:14 146:18 214:4 346:4 controls 112:1 124:22 188:4 190:20 348:7 controversial 206:12 controversy 253:10 conundrum 196:13 197:14,19 convened 1:10 275:21 conventional 32:5 101:6 103:9,13,19 104:3 119:12 123:6,20 125:1,4 125:21 134:17 167:12 170:6 184:11 191:19 218:12 229:18 233:19 240:17 245:13 246:21 251:12 275:3,11 276:12 327:4 328:21 332:20 | 380:7,11 387:19 390:12 392:10,18 conventionally 11:14 240:4 conversation 5:1 196:12 202:2 344:5 396:2 conversations 143:2 conversion 234:1 convey 258:22 260:16 281:1 convoluted 198:15 Cooperative 11:4 cooperatively 147:13 coordinate 41:3 Coordination 37:3 coordinator 9:9 12:3 144:3 copper 181:3,8 182:13,16 183:1,3 183:5,8,10,15,17 184:3 338:20 339:4,6,7,15 340:6,9,11,16,21 core 30:14 197:20 199:1 241:21 270:16 387:11 corn 161:13 162:5 166:19 328:11 347:9 348:13 352:1,3,15 354:6 354:7 385:4 394:10,11 Cornucopia 67:4 67:20 209:12 287:22 300:5 356:4,10 370:3 373:4 375:6 376:7 376:18 377:10 corporate 68:15 corporation 68:8 150:14,18 152:15 corporations 68:13 correct 94:5 192:15 236:7 289:17 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-----------------------------|----------------------------|----------------------------|----------------------------|---------------------------|
| 319:4 368:10 | 169:21 206:12 | 118:14 209:6 | 151:15 157:13 | 10:8 11:3 34:3 |
| corrective 58:7 | 217:22 232:13 | 223:15 | 158:14,14 159:21 | 37:12,16 41:8 |
| correctly 129:10 | 251:16 268:19 | credibility 107:17 | 161:21 162:2 | 45:15 46:1 48:22 |
| 199:5 | 310:5 327:16 | credible 68:3 | 167:12,13 170:4 | 72:11 76:6 109:11 |
| correspondence | 338:10 352:1 | creeping 362:11 | 173:18 174:3,10 | 149:5,6 152:12 |
| 49:12 | coupled 279:3 | Crider 243:22 | 231:20 269:14 | 222:18 253:13 |
| corresponding | course 32:3 40:3 | 253:5,6,6 | 285:16 287:17,20 | 255:10 305:3 |
| 53:13 | 112:8 113:20 | crisis 157:2,3 | 288:5 301:13 | 313:8 314:13 |
| Corvallis 123:16 | 118:12,14 125:9 | 323:13 | 306:11 321:15 | 317:14 325:5 |
| cosmetic 317:19 | 157:10 204:8 | Crisp 272:22 | 323:7 349:10 | 363:12 365:9 |
| cost 35:8 46:21 | 251:15 255:2 | criteria 58:19 | 351:20,21 352:8 | curse 79:15 |
| 71:16 72:20 99:16 | 259:4 281:12 | 71:21 74:18 82:22 | 371:15 | curve 127:9 128:18 |
| 124:3 125:15 | 293:2 300:20 | 90:20 171:4 172:4 | cross-references | customers 139:21 |
| 352:22 354:4 | 314:22 366:21 | 179:3 199:19,19 | 314:13 | 258:13 |
| 355:5,12 391:4 | 390:8 | 238:2 263:20 | cross-sector 196:15 | cut 70:14 117:15 |
| costly 104:22 | cover 124:17 | 297:17 372:7 | crucial 389:22 | 396:22 |
| 170:11 | 149:17 153:11 | 377:19,21 378:10 | crunchy 250:14 | cutting 397:1 |
| costs 55:1,2,3 71:16 | 234:1 | criterion 357:15 | Crupain 217:7 | Cverckova 178:12 |
| 125:12,12 129:21 | covered 40:3 75:16 | critical 76:19 77:7 | crutches 92:2 | Cyanotech 150:13 |
| 298:11 314:6 | 75:16 | 117:14 122:4 | crux 116:19 | 150:18 152:14 |
| 347:11 | covering 59:7 | 126:8 127:13 | Cruz 9:21 233:17 | cycle 136:1 |
| cotton 107:21 | cows 67:16 162:10 | 137:1 232:7 | crying 250:17 | cycles 341:2 |
| 352:1 | Cox's 272:18 | 234:12 326:11 | cues 280:5 | |
| Cougar 264:3,11 | co-director 67:3 | 344:4 377:21 | cuff 158:9 | D |
| Council 369:6 | co-existence 167:10 | critically 223:8 | culminate 88:5 | D 140:16 |
| count 259:1 322:6 | 328:14,21 330:4 | 237:17 | cultivars 260:19 | Dag 337:16,17 |
| 385:8 390:9 | 338:3 | criticism 374:9 | cultivating 177:4 | 361:5,8 |
| counted 274:18 | co-owners 257:4 | crop 6:7 11:4 33:13 | cultivation 174:21 | daily 14:14 256:2 |
| 313:19 | Craig 304:6 355:21 | 42:12 43:15 44:5 | 175:4 177:4 | 364:4 |
| countless 13:17 | 361:6 369:20 | 44:7 68:4 89:21 | cultivator 175:21 | dairies 161:16 |
| 141:7 | 370:1 | 111:10 150:21 | cultural 125:10 | dairy 11:7 12:21 |
| countries 34:5 | Crawford 277:4 | 151:9,12 159:17 | 147:3 188:4 189:5 | 161:4,7,8,18 |
| 67:14 114:10,18 | cream 161:5,5 | 167:14 176:1 | 190:20 | 162:8 165:9,11 |
| 114:20 218:13 | creamery 161:3,10 | 231:18 246:12 | cumbersome 280:7 | 220:2 |
| 335:16 | 161:11,16,18 | 259:13 260:6,7 | 288:21 | damage 178:9 |
| country 8:14 24:2 | create 39:15 97:13 | 263:1 266:5,11,13 | curious 148:2 | damaging 197:1 |
| 32:13 50:5 55:6,7 | 105:3 198:7,21 | 266:16 267:15 | 199:9 202:20 | Dana 27:7 31:2 |
| 67:6 92:19 132:6 | 209:20 217:4 | 270:3 287:3 | 215:7 218:4 | danger 264:18 |
| 218:11 257:8 | 225:13 226:10 | 291:11 298:15 | current 40:9 45:11 | dangers 183:9 |
| 269:1 382:9 | 229:7 264:9 265:7 | 305:11 306:4 | 48:10,22 49:1 | 237:15 |
| county 233:17 | 265:8,15 298:10 | 324:17 347:9 | 52:20 54:7 55:14 | dare 115:15 |
| 384:17 385:2 | 365:11 | 348:12 362:15 | 62:4 70:15 76:8 | dark 221:20 222:3 |
| 391:3 | created 52:22 | 370:11 371:12 | 88:4 92:17 98:9 | 375:19 376:10 |
| couple 18:8 82:1 | 97:16 214:15 | cropping 158:17 | 126:4 151:8 | 380:5 |
| 123:1 124:19,20 | creates 82:10 88:15 | crops 7:3,19 10:3 | 168:10 296:11 | Darryl 304:12,13 |
| 137:4 143:11,14 | 229:7 | 11:21 12:12,13 | 362:6 | 309:22 310:3 |
| 154:5 156:15 | creating 97:17 | 13:5 86:21 107:21 | currently 6:11 9:8 | 314:10,10 319:9 |

| | | | | |
|---------------------------|----------------------------|----------------------------|---------------------------|----------------------------|
| darting 17:18 | 182:20 261:16 | 138:7,9 143:19,21 | 389:7 390:18 | deregulation |
| data 102:21 134:16 | 332:8 | 150:6 153:9 160:8 | definitive 219:21 | 162:12 |
| 155:13,15 158:11 | dealing 10:21 | 160:19 168:6 | degree 149:2 194:7 | derived 165:16 |
| 177:2 182:19 | 183:18 294:14 | 173:1 206:1,2 | 264:5 326:14 | derogations 340:19 |
| 183:13 201:5 | 323:19 | 230:22 237:8 | dehydration 314:4 | describe 54:7 107:8 |
| 208:6 210:9 | dear 71:8 144:9,20 | 243:22 253:5 | delayed 282:22 | 280:19 299:8 |
| 219:10 241:16 | debate 18:11 22:8 | 257:1 304:13 | deliberate 87:9 | 314:11,12 |
| 295:4 329:14 | 23:10 108:4 | 337:17 355:22 | deliberations | described 152:1 |
| 343:13,15,21 | 201:20 219:5 | 361:7 369:21 | 149:14 156:9 | describes 42:15 |
| 344:3 346:6 368:5 | 230:6 238:15 | 373:1 381:16 | Delicious 249:22 | 45:14 46:12 |
| 368:12 379:1 | 259:2 343:3 345:1 | declaration 22:9 | deliver 167:18 | 151:15 |
| database 46:1,16 | Deborah 85:12,13 | declare 23:1 | delivered 116:14 | describing 266:17 |
| 46:17 | 85:13 | declared 22:10 | 343:11 | description 176:16 |
| date 77:2 84:9,10 | Debra 94:19 | declaring 38:13 | delivering 98:10 | 302:6 371:16 |
| 84:13 86:22 87:21 | decade 92:7 | decline 67:9 232:2 | delivery 167:20 | descriptions |
| 96:19 102:4,5 | decades 12:11 | decrease 134:6,14 | demand 193:9 | 361:19 |
| 127:3 129:3,14 | 347:13 | 162:14 | demographic | deserve 13:22 |
| 145:17,22 170:22 | December 36:12 | dedicated 15:16 | 386:11 387:14 | design 46:14 218:5 |
| 224:21 227:6,21 | decent 250:8 | 145:6 211:12 | demonstrate | designed 336:12 |
| 237:21 339:17 | decide 93:19 | 276:18 | 347:16 | 374:12 375:18 |
| dates 97:12 | 122:13 296:15 | dedication 95:9 | demonstrated | desire 8:11 125:17 |
| Dave 277:7 | 300:20 | deep 194:4 | 87:14 | despite 146:3 |
| David 124:12,18,19 | decided 107:11 | deepening 61:3 | demonstrates | destiny 72:18 |
| 168:4,5,5 172:22 | 252:14 274:13 | deeper 22:1 184:9 | 237:13 | destroy 232:20 |
| 173:3 175:13 | 324:11 369:5,6 | deeply 346:12 | demonstrating | destroying 172:13 |
| Dawson 175:15 | decision 18:4 19:20 | defend 72:20 102:4 | 238:13 | destruction 145:2 |
| day 17:15 26:10 | 23:13 43:21 44:1 | defending 134:2 | denial 170:6 | 172:16 240:3 |
| 86:11 167:18 | 101:17 170:17,18 | 237:2 | denied 170:7 | destructive 174:20 |
| 176:3,10 250:10 | 170:20 198:6,9 | deficiencies 200:10 | Denna 85:17 | detail 4:19 39:16 |
| 250:10 290:6 | 199:13 218:9 | define 106:19 | density 268:18 | 62:15 174:15 |
| 319:14 363:22 | 223:7 227:5 | 364:17 | 270:5 | 177:20 253:16 |
| 381:8 | 228:13 239:3 | defined 36:17 | deny 170:7 238:21 | 362:4 |
| days 16:22 70:14 | 251:5,14 293:8 | 57:13 163:6 | 242:2 | detailed 142:16 |
| 105:14 156:15 | 311:1 358:6 | defining 75:13 | department 1:1 | 308:4 |
| 264:6,10 274:2 | 377:20 378:9 | definitely 330:20 | 11:18 73:14 | details 77:22 |
| de 347:2 | decisions 19:13 | definition 77:15,18 | 201:21 211:11 | 248:14 267:22 |
| dead 94:8 | 21:19 26:4 34:14 | 107:9 144:14,18 | 218:19 221:11 | 308:7 313:16 |
| deadline 93:14 | 57:18 112:18 | 231:16 234:16 | 288:21 289:11 | 324:22 327:11 |
| 96:22 117:13 | 289:9 378:3,7 | 239:8 284:13 | 290:18 | 349:1 354:1 |
| 118:9,12,13 121:8 | decision-making | 285:9,20 287:14 | depend 16:8 93:18 | detect 45:9 |
| 121:17,19 127:11 | 20:18 23:11 | 302:6,21 303:4 | 98:7 322:8 375:10 | detectable 251:7 |
| 130:1 135:2 136:4 | 132:18 203:15 | 326:16 333:20,22 | dependent 111:6 | 254:10 255:4,21 |
| 136:6 326:1 | 375:13 | 334:3,5,7,9,12 | 226:2 362:1 | detecting 348:12 |
| 372:15 | decisive 204:4 | 357:3,14 371:6,8 | depending 5:9 | detection 213:7 |
| deadlines 97:15 | deck 67:1 71:3,5 | 371:20 372:2 | 304:2 318:4 397:2 | 325:13 |
| 118:14 | 74:2 78:16 83:13 | definitions 37:12 | depression 220:17 | determination |
| deal 74:16 120:13 | 94:22 105:15 | 302:12 306:3,13 | deputy 2:12 13:14 | 241:12 263:18,22 |

| | | | | |
|--------------------------|-----------------------------|-----------------------------|----------------------------|----------------------------|
| 285:5 309:2 374:6 | die-off 232:8 | digest 336:3 | disappointed 81:13 | 264:9 286:16 |
| determinations | differ 350:14 | digging 90:3 | 170:3 276:13 | disease-control |
| 34:15 | difference 121:11 | 281:18 | disappointing | 89:2 |
| determine 58:18 | 122:2 129:7,11,22 | digits 248:22 | 246:22 258:6 | disease-reducing |
| 76:17 349:17 | 131:2 155:21 | dilating 17:16 | 343:3 | 265:10 |
| 378:21 | 196:5 222:17 | dilemma 226:10 | disclosed 353:10 | disinfectants 145:4 |
| determined 309:7 | 338:11,16 341:7 | diligent 4:7,14 66:3 | disclosure 76:2,13 | disk 177:10 |
| determining | 341:10 352:13 | diligently 234:21 | 293:21 294:10 | disorders 139:18 |
| 356:20 374:16 | 355:1 392:18 | diluted 252:8 | 354:6 376:3 | disparity 130:18 |
| devastated 275:16 | differences 80:8 | dilutes 367:8 | 378:13 | dispersed 288:8 |
| devastating 262:5 | 121:7 128:3,4 | DiMatteo 287:12 | discovered 268:1 | 371:3 |
| 262:11,21 268:3 | 292:16 339:11 | diminish 209:19 | discrete 348:18 | display 162:4 |
| develop 22:17 | different 46:7 53:3 | diminishes 367:8 | discuss 23:2 78:14 | disproportionate |
| 40:22 47:8 95:11 | 56:3 98:21 105:19 | dinner 5:4 | 106:2 284:10 | 39:7,8 40:11 |
| 97:2 113:13 | 110:3,19 128:14 | dioxide 253:12,20 | 295:21 319:22 | 357:15 |
| 116:12 | 158:15 160:1,2 | 255:11,20 256:8 | 376:1 | disproportionately |
| developed 117:15 | 163:10 182:14 | direct 51:22 53:14 | discussed 91:22 | 39:12,21 |
| 203:16 209:8,14 | 195:3 201:7,13 | 55:2 125:14 | 305:18 306:21 | dispute 207:1 |
| 214:21 220:5 | 223:1 236:21 | 189:17 280:5 | discusses 22:16 | disrespectful |
| 341:11 375:4 | 260:21 268:7 | 287:17 360:10 | 45:17 | 185:15 |
| developing 41:6 | 272:9 273:13 | directed 61:12 | discussing 124:11 | disruption 8:7 |
| 117:5 145:13 | 308:16 315:14,15 | 82:15 | 151:16 331:4 | 364:19 |
| 356:14 | 317:21 325:19 | direction 188:7 | discussion 18:11 | disruptive 97:13 |
| development 6:6 | 327:16,16 340:7 | 189:11 192:17 | 23:5 56:2 75:19 | disseminated 88:6 |
| 7:20 10:22 12:6 | 350:9 351:13 | 211:21 331:18 | 77:17 80:19 | distinction 60:18 |
| 14:19 32:19,20 | 352:7 358:19 | 364:12 389:14 | 106:12 156:6 | 61:8 197:7,9 |
| 41:7 46:14 72:7 | 364:1,14 386:11 | directly 39:12,20 | 221:9 224:16 | distinctions 172:3 |
| 77:3 121:12 | 386:16 387:14 | 59:4 70:3 271:12 | 226:22 284:14,19 | 224:17 225:1 |
| 152:18 231:7 | 389:7 392:20 | 271:15 287:19 | 285:3 288:16 | distinguish 76:3 |
| 241:21 | 396:8 | 292:15 295:7 | 290:15 291:4 | 220:13 |
| devices 306:6 | differentiate 220:8 | 306:9,10 326:20 | 296:4 302:20 | distinguishes |
| devil's 352:19 | 222:12 364:16 | 328:22 393:2 | 303:20 304:1 | 140:19 |
| Devlaeminck 85:22 | differentiating | director 2:16 7:22 | 319:17 323:19,21 | distinguishing |
| DHA 139:12,15 | 221:17 | 9:22 11:10 14:4 | 324:3,10,13,14 | 61:20 |
| 140:3 | differing 79:4 | 69:2 70:1 86:16 | 325:1,2,9,20,21 | distorted 258:5 |
| dialogue 227:22 | difficult 26:4 34:22 | 116:2 138:17 | 328:6,9 330:9 | distorting 196:19 |
| 277:12 278:21 | 35:1 36:14 83:11 | 237:11 304:15 | 333:13 336:6 | distracted 324:16 |
| 279:6 289:11 | 112:18 113:8,22 | 359:21 | 343:7,21 346:13 | distribute 161:6 |
| Diane 277:5 | 162:9 199:10,21 | Directors 168:8 | 373:8 377:14 | distribution 254:7 |
| DICKSON 1:17 | 255:19 258:18 | dirt 281:18 | 379:10 | 271:4 |
| dictates 249:17 | 259:15 317:8 | disabilities 8:6 | discussions 48:3 | diversified 51:22 |
| 250:12 | 318:12 364:17 | disagree 19:6 | 131:14 329:4 | diversity 79:1 |
| die 94:4 262:20 | 366:5 389:5 | 356:11 | 344:8 375:21 | 375:11 |
| diesel 175:20 | 393:20 394:6 | disagreeable 19:7 | 393:18 | diverted 164:11 |
| diet 27:15 | difficulties 270:2 | disagreed 292:1 | disease 94:6 117:20 | divide 80:6 |
| dietary 311:19,22 | difficulty 198:12 | disagreement 81:7 | 157:1,14 207:8 | division 2:16,18 |
| 312:22 | dig 184:9 | disallowed 71:22 | 217:12 260:5 | 14:4,8,17 15:2 |

| | | | | |
|---------------------------|----------------------------|---------------------------|-----------------------------|----------------------------|
| 59:3 | 390:21 | driving 99:10 | easy 99:13 260:22 | effects 91:6,15 |
| Dixon 9:5,6 93:11 | dollar 129:21 | dropped 304:9 | 363:2 366:3 | 158:1 235:12 |
| 142:19 | dollars 34:11 101:2 | drops 175:10 | eat 162:19 245:17 | 293:14 297:12,18 |
| DL-Methionine | 176:10 232:5 | 352:12 | 249:20 250:11 | 297:20 379:9 |
| 109:5 | 260:8 263:3 | drove 28:19 | 254:15 322:7 | efficiencies 298:11 |
| DNA 362:1 | 272:15 | drug 223:7 | 385:3 393:1 | efficiency 90:1 |
| doable 127:4 | domestically | drugs 216:3 | eater 176:3 | efficient 54:16 |
| docket 50:20 243:8 | 107:18 | dry 278:17 | eating 139:19 | 56:13 74:15 |
| 336:13 | dominance 332:11 | DSRNA 390:18 | 168:19 218:12 | 163:15 |
| docs 157:14 | Don 67:1 71:2,3,3 | dubious 67:12 | 258:9 | effort 66:4 147:13 |
| document 96:7 | donation 359:3 | 109:4 | EBDC 113:16 | 234:7 354:5 |
| 126:15 151:14,22 | donations 359:5 | due 44:13 50:17 | echo 77:13 | 355:17 |
| 156:11 175:2 | door 104:1 | 117:7 150:22 | economic 32:18 | efforts 36:20 46:14 |
| 189:2 224:13 | doses 223:12 | 377:8 | 77:8 99:21 112:19 | 57:5 95:9 116:11 |
| 284:15,19 285:3 | double 282:21 | dunk 366:3 | 181:15 201:14 | 117:6 146:4 391:9 |
| 287:11 288:16 | 283:21 319:12 | duplicates 243:10 | 344:15 387:10 | 391:10,11 |
| 290:15 291:5 | 337:14 359:6 | Durst 153:9 154:4 | economics 10:19 | eggs 70:11 |
| 296:5 309:9 | doubt 148:15 | 155:14 156:12 | 99:13,14 268:11 | egg-laying 70:6 |
| 313:17 324:1,4,10 | 239:20 | 158:9 159:9 | 273:5 | egregious 57:6 |
| 324:13,14 325:2,9 | downsized 270:11 | duty 158:5 | ecosystem 286:3 | eight 233:16 |
| 325:21 328:6 | downstream | dwarfing 269:17 | 288:3 | 259:11 271:19 |
| 330:10 336:12,18 | 225:22 | 272:2,6 | ed 68:11 | 325:1 |
| 336:19,22 338:9 | Dr 3:5,17 14:22 | dynamic 4:14 | edge 342:5 | eighteen 209:17 |
| 364:7 373:8 | 217:7,8,13 242:7 | D.C 8:1 24:1 34:21 | educate 60:20 | either 84:13 87:5 |
| 377:14 379:10 | 277:9 | | 178:16 | 129:17 133:17 |
| documentation | draft 43:13,20 44:4 | E | educated 87:16 | 171:20 218:12 |
| 63:8 157:6 165:20 | 44:14 89:20 364:7 | eagerly 153:2 | 247:21 264:14 | 219:20 229:22 |
| 364:9 | drafted 305:16 | ear 169:22 | 386:19 | 242:17 288:19 |
| documented 120:2 | 361:20 | earlier 182:17 | educating 64:7 | 302:2 306:10 |
| 147:4 | dragging 185:14 | 304:12 372:9 | education 87:2 | 331:2 334:4 |
| documents 16:10 | drainage 269:21,21 | 384:16 | 117:16 127:14 | 368:10 372:18 |
| 51:12 75:19 156:8 | dramatic 352:12 | early 59:1 195:15 | 391:12 | element 183:10 |
| 156:16 213:20 | 392:2,4 | 270:9 | educational 61:9 | elements 53:3 |
| 304:1 313:9 | dramatically | earned 4:17 | educators 87:19 | 54:17 |
| 323:19 324:6 | 166:19 | ears 278:3 279:22 | 139:16 | elevator 347:4 |
| 336:6 | draw 70:4 145:18 | Earth 168:22 | effect 193:3 256:15 | elicited 218:7 |
| doing 8:1 9:1,4 | 395:1 | 172:15 | 315:2,4,7 316:17 | eligibility 175:2 |
| 22:5 28:15 31:12 | drawing 376:16 | Earthbound 10:2 | effective 45:4 87:15 | 177:18 |
| 35:15 45:20 46:10 | drawn 393:20 | Earthrise 150:12 | 116:12 123:4 | eliminate 56:17 |
| 46:20 52:17 58:15 | dried 317:22 | 150:14,18 152:15 | 146:1 147:4 | 170:18 348:16 |
| 63:9,15 108:17 | drift 62:8 | ease 271:22 | 188:13 190:21 | eliminating 56:13 |
| 183:14 187:3,11 | drilling 21:17,22 | easier 163:12 | 191:1 260:1 | 102:15 164:12 |
| 189:8 193:2 | Driscoll 6:20 | 309:14 | effectively 116:13 | elimination 96:17 |
| 194:20 203:4 | drive 349:4 366:11 | easily 99:14,19 | 118:5 147:6 | elite 245:16 |
| 227:15 268:18,20 | 366:13 | 108:21 | 388:20 | elitist 390:22 |
| 281:15 299:20 | driver 99:8 | East 110:8 | effectiveness | eloquent 97:20 |
| 335:16 387:12 | | Eastern 11:16 | 191:14 | email 86:3 256:3 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 395:19 emailed 283:18 embarrass 359:14 embarrassed 279:12 embrace 64:12 198:4 emerged 201:19 emergence 209:10 emergency 114:11 emerging 37:2 106:14 117:18 119:6 131:18 239:12 empathy 141:3 employee 358:21 359:2 employees 50:1 68:12 358:20,20 employer 357:22 employers 68:15 employer's 358:7 empower 178:16 empowers 33:8 emulsions 286:15 enable 60:8 388:11 encountered 178:6 encourage 79:1 90:7 95:14 174:18 179:12 181:22 196:1 203:1 204:2 213:19 349:22 encouraged 61:14 197:15 198:20 202:21 encourages 256:7 encouraging 40:19 89:8 191:17 200:6 203:6,15 ended 31:5 124:15 290:15 364:22 endpoint 185:20 enemies 231:20 enemy 257:3 energy 177:3,5 enforce 65:9 68:9 175:5 329:21 | enforceable 65:8 77:12 enforced 41:11 enforcement 46:9 57:4,5,8,18 enforcing 63:22 engage 38:20 147:11 343:12 348:9 387:16 388:3,8 engaged 38:21 387:17 engagement 98:5 engaging 387:1 engineer 6:14 engineered 36:8 240:21 367:13 engineering 106:9 106:16,19 107:7 333:19 English 107:7 enhance 323:1 enhanced 278:19 enjoy 244:3 enjoying 29:4 enormous 102:10 254:12 ensure 8:13 44:22 48:18 49:6 56:19 63:4 87:2 146:9 280:22 330:2 363:18 364:21 370:5 ensuring 76:7 89:4 378:3 enter 342:16 entered 71:18 entire 145:12 211:11 278:4 319:14 357:12 358:16 entirely 106:10 374:21 Entities 98:11 entity 357:1 environment 72:2 79:13 80:4 82:9 | 84:22 173:14 194:17 212:8,19 217:4 222:16 223:14,16 224:7 225:12 226:6,9 233:21 235:6 240:6 265:9,17 323:2 367:9 371:3 371:13 378:20,22 environmental 6:14 8:4,8 13:7 55:17 177:22 235:12 297:13,18 297:19 378:14 379:9 environmentalist 265:19 environmentalists 8:3 79:11 environmentally 173:12 240:3 environmentally-... 31:18 envision 178:18 EPA 37:6 72:7,12 97:5 122:7 174:22 177:17 212:16 213:1,19,20 339:3 339:8 episode 262:5 EQIP 33:13 equally 24:2 196:22 equals 249:2 equating 159:20 equation 348:17 387:22 equipment 285:17 287:19 288:4 371:14 equitable 79:1 343:8 equivalency 51:20 335:20 equivalent 42:15 77:4 equivalents 364:15 | era 249:22 eradicated 363:22 Erik 160:9 205:11 erosion 174:22 353:15 392:12 esoteric 219:1 especially 32:13 43:16 88:13 139:6 171:6 174:21 185:6 257:14 291:11 331:13 356:19 essential 13:20 162:20 238:13 essentiality 297:18 297:20 essentially 99:22 100:5 178:2 223:18 297:15 325:3 327:14 356:21 373:21 374:20 establish 40:15 76:7 325:4 372:4 385:9,21 394:2 established 88:9 establishes 33:19 establishing 394:2 estimated 231:21 232:3 et 16:10 18:13 154:18 292:8 311:15 etcetera 5:4 12:13 18:17 154:12 388:7 ethical 67:10,14 256:5 359:16 ethics 68:16 314:6 ETIPC 37:4,9 EU 107:10 111:17 162:6 238:11 340:10 341:4 365:20 366:22 Europe 115:5 127:18 128:4 181:3 182:8,21 | 183:19 213:19 214:5,10 255:16 335:17 365:9 European 43:10 106:21 109:18 112:1,8 115:8 183:14 214:6 268:17 338:12 339:12 340:2,6,17 Europeans 127:19 350:10 369:9 evaluate 112:7 195:8 297:1 310:21 316:10 317:15 evaluated 71:22 91:5 239:13 310:17 evaluating 42:21 280:3 310:13 evaluation 72:1,8,9 72:14 73:1 177:19 218:15 305:10 evaluations 59:20 events 254:8 360:22 eventual 232:8 eventually 82:5 94:2,7 114:2 156:21 everybody 14:3 26:1 34:21 100:20 138:3 184:16 206:4 228:8 284:18 285:12 296:8 337:3 388:12,13 390:1 everybody's 14:6 everyday 247:19 everyone's 4:4 18:10 78:11 ever-growing 314:2 evidence 102:5 114:17 185:4,5 237:13 evolution 391:12 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------|--------------------------|---------------------------|----------------------------|----------------------------|
| evolve 346:1 | 304:15 | 124:10 158:13 | 184:20 237:12 | face 80:7 256:1 |
| exacerbate 225:13 | exempt 379:15 | 169:16,19 181:10 | extension 13:5 | Facebook 258:12 |
| exact 236:18 | exist 108:10 | 199:9 248:13 | 80:18 118:17,18 | faced 85:6 117:21 |
| exactly 22:5 28:10 | existence 258:21 | 362:22 369:1,13 | 124:7 126:2,14,21 | 141:3 218:11 |
| 80:15 129:19 | 267:3 328:17 | experienced 273:18 | 126:22,22 128:19 | 344:8 |
| 192:10 264:18 | existing 119:7 | experiences 170:2 | 141:11,15 146:21 | faces 14:7 391:21 |
| 366:9 391:17 | 129:2 172:5 347:6 | 366:20 | 173:7 180:7 | 391:21 |
| examination 321:1 | exists 356:21,22 | experiencing 67:5 | 184:21,21,21,22 | facilitate 45:2 |
| example 68:1 | 357:8 390:4 | experimenting | 185:4 198:1 | 373:10 |
| 109:21 112:3 | exit 117:22 130:7 | 186:16 | 238:14,22 275:4 | facilities 312:9 |
| 113:15 199:17 | 130:15 134:9 | expert 222:14 | extensions 135:19 | facing 135:14 |
| 279:14 361:20 | expand 317:2 | 296:20 297:1 | 135:21 208:17 | 174:6 185:9 |
| 369:14 | expansion 197:16 | expertise 76:3 | extensive 100:9 | fact 79:21 121:14 |
| examples 38:12 | expect 140:13 | 115:20 | 253:16 | 121:21 125:1 |
| 61:6 75:15 95:22 | 149:1 162:16 | experts 72:9 128:2 | extensively 218:19 | 134:6 137:8,9,21 |
| 112:21 233:5 | 220:3,14 227:16 | 147:12 275:21 | extent 146:16 | 138:1 140:2 171:4 |
| 279:4 285:19,22 | 233:20 293:2 | expiration 82:14 | 151:10 307:13 | 175:2 178:1,6 |
| 361:18 371:1 | 315:18 323:3 | 84:13 86:22 87:21 | 352:2 | 184:8 185:3 |
| exceed 340:12 | 334:22 337:5 | 96:19 97:12 129:3 | external 346:18 | 200:13 201:2,2 |
| exceeded 162:6 | 339:9 372:16 | 129:14 145:17,22 | extra 114:1 136:22 | 202:19 207:22 |
| excellent 101:1 | expectation 40:8 | 170:22 237:21 | 138:2 142:14 | 212:14 213:13,14 |
| 117:8 | 76:14 78:6 79:19 | expired 50:18 | 186:9 | 219:15 220:4 |
| exception 229:8 | 133:10 169:8 | explain 49:22 | extract 317:15 | 225:10 260:4 |
| 380:3 | 171:13,22 346:15 | 165:10 190:11 | 318:7,10 | 272:2 287:8 |
| exceptions 76:19 | 347:17 | 210:14 266:2 | extractants 286:10 | 289:22 305:6 |
| excipients 286:10 | expectations 36:1 | 365:16 | extracted 317:22 | 307:12,19 327:18 |
| excited 23:21 | 38:15 79:15 | explanation 326:16 | extraction 240:2 | 334:20 339:20 |
| exciting 121:22 | 132:17 169:2 | explanatory 41:8 | extracts 286:15 | 344:20 391:10 |
| 177:20 | 170:21 171:18 | explicitly 173:20 | 317:5,21 318:9,14 | facto 347:2 |
| exclude 232:20 | 172:9,10 206:17 | exploration 76:9 | extraordinarily | factor 99:9 158:22 |
| excluded 12:18 | 206:21 207:2 | exploratory 76:9 | 386:14 | 194:9,11 201:19 |
| 14:11 43:7 75:20 | 208:7 209:3 222:8 | exponentially | extraordinary | 318:4 396:14 |
| 76:4,15 106:1 | 230:12 256:1 | 382:8 | 254:4 | factored 133:13 |
| 107:3 179:5 239:7 | 349:9 | export 255:17 | extrapolate 130:9 | factors 54:10 57:11 |
| 239:8,20 294:15 | expected 40:12 | exporter 347:4 | 315:13,20 | 200:22 |
| 320:20 321:4 | 278:13 359:2 | exposed 258:10 | extreme 157:3 | factory 67:15 |
| 323:20 326:17,21 | expects 172:12 | exposure 72:1 | 257:21 259:20 | Facts 368:16 |
| 333:18 336:18 | 346:21 | 131:20 | extremely 18:5 | factual 182:19 |
| 361:16 | expedite 179:6 | express 363:6,10 | 157:11 255:18 | 218:22 |
| exclusion 197:7 | expeditious 69:22 | 389:4 | 258:6 269:13 | fact-based 118:11 |
| exclusively 327:3 | expense 53:13 | expresses 97:21 | 317:17 | Fagan 368:18 |
| excuse 137:12 | expenses 53:15 | expressing 84:9 | eye 178:9 234:3 | fail 118:16 |
| 138:8 162:18 | expensive 123:12 | extend 86:22 96:19 | eyes 26:14,21 278:3 | failed 169:20 |
| 202:9 | 298:12 309:9,12 | 324:11 | 279:22 | 201:12 |
| execution 67:21 | 347:9 | extended 155:3 | | fails 238:2 |
| executive 1:11 7:21 | experience 72:10 | 182:3 325:22 | F | failure 208:18,19 |
| 10:4 18:6 22:22 | 99:11,12 117:17 | 377:10 | FACA 23:6 | 209:5 |
| | | extending 77:2 | | |

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| fair 33:21 57:4 72:19 78:22 221:21,21 302:12 343:8 396:6 | 267:4 268:16 269:11,14 271:15 279:15,16 280:4 286:12 356:7 | 175:8 196:6 232:19 254:21 257:5 259:9 322:14 | 199:10 222:3 245:6 333:1 362:5 364:20 392:1,4,6 | 246:1,12 262:13 263:12,21 264:16 265:22 266:3,18 266:18,21 267:11 267:20,21 353:9 364:5 367:3,18 383:4 |
| fairly 81:9 99:14 177:6,7 264:13 333:21 | farmed 9:2 farmer 5:21 12:12 12:22 17:9 52:11 79:5 81:5 161:1 163:16 165:9 176:6,6,8 181:20 195:20 202:19,22 261:4 279:11,16 280:7 325:9 347:3 349:8,18 359:18 362:14 363:18 377:7 380:17,22 | fashion 88:21 131:20 185:6 fast 84:8,10 85:1 118:20 228:22 360:2 364:6 father 372:12 fathers 383:7 fatty 178:1 favor 24:19 25:3 68:14 favorable 173:12 Favre 1:18 6:10,11 217:21 FDA 37:6 313:21 314:1 317:10 364:6 374:5 FDA's 232:15 fear 97:7 184:20 258:2 fearful 185:12,18 feasible 311:11 349:3 353:22 features 99:9 February 106:12 fed 27:15 347:14 federal 34:21 37:15 48:12 73:13 337:22 378:4 Federation 105:21 feed 42:4,8,22 43:2 43:2 45:10,16 162:10,14 164:3 164:15,20 167:19 321:15 feedback 36:3 57:22 284:3 feeding 251:6 feel 30:4 98:2 99:3 99:5,7 110:16 126:20 127:2 128:21 179:20 185:7 186:12,19 188:13 190:12 | feels 106:15 364:21 fees 53:15 54:22 feet 185:14 186:8 186:12 187:12,16 Felch 381:12 Feldman 1:18 7:18 7:19 83:6 91:4,9 91:14 92:5,9 112:15 132:13 135:3 136:7 147:19,22 148:22 149:6,9 156:4,14 166:6 167:8 184:5 187:14 199:8 210:13 228:4 273:9,12 284:17 296:1 303:3 307:4 308:2,6,19 309:17 315:22 316:12,20 319:18,21 320:6,9 324:4 386:3,6,9 388:16 391:6 fellow 21:5 159:7 265:14 268:21 felt 20:12 179:21 273:14 388:9 FEMALE 26:9,13 26:17 27:1,3,4,6 27:10,13,18,22 28:1,3,7,11,14,15 28:18,21 29:3,7 29:15,19,22 30:6 30:9,13,16 31:1,3 fence 281:17 fertility 175:6 fertilizers 240:5 286:13 fewer 73:3 fiber 241:2 field 33:20 50:4 82:2 88:5 116:20 132:2 149:15 158:14 213:4 230:2 232:13 | filed 248:1,3,12 fields 157:8 167:11 175:21 280:4 281:18 321:10 fifth 341:15 Fifty-four 208:2 fight 393:10 394:22 fighting 353:12 figure 84:2 130:9 307:9 317:8,15 318:13 320:1 326:1 331:1 390:8 390:17 filed 70:6,7 fill 52:12 fillers 286:10 film 302:15 final 50:14 70:12 80:1 144:14,19 239:3 309:9 330:6 330:7 342:22 351:1 finalized 48:11 finalizing 290:17 finally 70:15 72:13 100:22 101:3 120:10 235:14 336:10 financial 71:14 72:16 241:16 295:7 find 17:6 63:13 75:20 77:7,12 90:5 113:22 158:12 196:14 197:11,19 247:2,3 255:18 258:6 311:21 316:13 350:15 368:20 392:17 393:2 |
| fall 11:7 20:20 25:13 31:22 112:4 136:13 299:7 365:11 | farmers 6:16 7:10 8:2 33:1,20 34:6 60:11 67:6,9,11 67:14 73:2 81:19 108:4 113:17 114:1 141:4,5 146:5 163:12 176:5 177:16 178:17 179:7 184:6 188:12 204:8 215:7 233:6 233:10,14,19,19 234:20 236:4 261:5 271:14 302:22 322:18 330:1 348:3 349:2 349:5 351:11,14 351:19 353:10 362:22 369:5 370:9,13 384:16 385:15,16 394:13 394:13,14,15 | favor 24:19 25:3 68:14 favorable 173:12 Favre 1:18 6:10,11 217:21 FDA 37:6 313:21 314:1 317:10 364:6 374:5 FDA's 232:15 fear 97:7 184:20 258:2 fearful 185:12,18 feasible 311:11 349:3 353:22 features 99:9 February 106:12 fed 27:15 347:14 federal 34:21 37:15 48:12 73:13 337:22 378:4 Federation 105:21 feed 42:4,8,22 43:2 43:2 45:10,16 162:10,14 164:3 164:15,20 167:19 321:15 feedback 36:3 57:22 284:3 feeding 251:6 feel 30:4 98:2 99:3 99:5,7 110:16 126:20 127:2 128:21 179:20 185:7 186:12,19 188:13 190:12 | filed 248:1,3,12 fields 157:8 167:11 175:21 280:4 281:18 321:10 fifth 341:15 Fifty-four 208:2 fight 393:10 394:22 fighting 353:12 figure 84:2 130:9 307:9 317:8,15 318:13 320:1 326:1 331:1 390:8 390:17 filed 70:6,7 fill 52:12 fillers 286:10 film 302:15 final 50:14 70:12 80:1 144:14,19 239:3 309:9 330:6 330:7 342:22 351:1 finalized 48:11 finalizing 290:17 finally 70:15 72:13 100:22 101:3 120:10 235:14 336:10 financial 71:14 72:16 241:16 295:7 find 17:6 63:13 75:20 77:7,12 90:5 113:22 158:12 196:14 197:11,19 247:2,3 255:18 258:6 311:21 316:13 350:15 368:20 392:17 393:2 | |
| falling 355:6 falls 117:13 familiar 93:6 102:21 342:22 families 185:17 393:13 family 10:10 15:18 32:1 67:11 161:3 246:7 254:21 370:2 393:12 fans 270:1 fantastic 29:6 Fantle 67:1,2,3 far 17:11 19:17 57:21 93:7 97:3 99:18 125:14 133:15 140:21,22 176:17 178:6 183:13 266:4 farm 7:11,13,13 10:2,10 11:6 12:3 12:12 13:1 29:22 30:5 35:6 53:2 57:14 97:1,18 147:14 161:7,9 168:13 173:8 176:1 188:21 190:14 231:2,4 233:11 244:17 261:9,12 265:7 | farmed 9:2 farmer 5:21 12:12 12:22 17:9 52:11 79:5 81:5 161:1 163:16 165:9 176:6,6,8 181:20 195:20 202:19,22 261:4 279:11,16 280:7 325:9 347:3 349:8,18 359:18 362:14 363:18 377:7 380:17,22 farmers 6:16 7:10 8:2 33:1,20 34:6 60:11 67:6,9,11 67:14 73:2 81:19 108:4 113:17 114:1 141:4,5 146:5 163:12 176:5 177:16 178:17 179:7 184:6 188:12 204:8 215:7 233:6 233:10,14,19,19 234:20 236:4 261:5 271:14 302:22 322:18 330:1 348:3 349:2 349:5 351:11,14 351:19 353:10 362:22 369:5 370:9,13 384:16 385:15,16 394:13 394:13,14,15 farming 6:1 23:20 31:19 72:18 79:21 188:15,18 203:2 210:6 244:19 farmland 269:14 farms 34:16 53:18 53:22 56:21 67:15 110:17 149:4,4 161:18 162:8 | favor 24:19 25:3 68:14 favorable 173:12 Favre 1:18 6:10,11 217:21 FDA 37:6 313:21 314:1 317:10 364:6 374:5 FDA's 232:15 fear 97:7 184:20 258:2 fearful 185:12,18 feasible 311:11 349:3 353:22 features 99:9 February 106:12 fed 27:15 347:14 federal 34:21 37:15 48:12 73:13 337:22 378:4 Federation 105:21 feed 42:4,8,22 43:2 43:2 45:10,16 162:10,14 164:3 164:15,20 167:19 321:15 feedback 36:3 57:22 284:3 feeding 251:6 feel 30:4 98:2 99:3 99:5,7 110:16 126:20 127:2 128:21 179:20 185:7 186:12,19 188:13 190:12 | filed 248:1,3,12 fields 157:8 167:11 175:21 280:4 281:18 321:10 fifth 341:15 Fifty-four 208:2 fight 393:10 394:22 fighting 353:12 figure 84:2 130:9 307:9 317:8,15 318:13 320:1 326:1 331:1 390:8 390:17 filed 70:6,7 fill 52:12 fillers 286:10 film 302:15 final 50:14 70:12 80:1 144:14,19 239:3 309:9 330:6 330:7 342:22 351:1 finalized 48:11 finalizing 290:17 finally 70:15 72:13 100:22 101:3 120:10 235:14 336:10 financial 71:14 72:16 241:16 295:7 find 17:6 63:13 75:20 77:7,12 90:5 113:22 158:12 196:14 197:11,19 247:2,3 255:18 258:6 311:21 316:13 350:15 368:20 392:17 393:2 | |

| | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| finding 139:11 180:1 238:11 391:13 392:21 | 216:18 238:16 245:22 259:9 261:8 266:20 267:2 269:2 284:13 291:17,20 294:5 325:3 337:12 339:2 341:12,16 345:17 346:3 361:12 375:8 382:2 391:20 | focus 50:12 51:11 51:17 53:12 57:5 58:7 169:4 277:14 277:20 | 245:16 248:15 250:5 253:8 254:17 255:15 278:18 286:2 303:12 306:12 314:7 320:18 321:11 322:2,5,7 322:8,10,17,22 323:3,13 332:2,6 332:20 333:2,15 362:7,12 365:20 370:6 373:11 374:7,17 380:7,12 380:16 383:8,12 383:20 386:17,21 387:15,19,20 390:9,21,22 392:14 | formation 151:17 former 16:14 67:13 168:10 201:4 312:4 formerly 171:6 forms 182:12,13 formula 293:2 formulas 241:15 295:3 formulate 299:9 formulated 112:10 112:13 formulating 72:22 formulations 286:12 forth 77:14 289:16 324:9,18 325:2,8 325:11,21 328:8 335:5 |
| finished 255:22 256:16 316:18 | firstly 104:19 | focused 57:4 58:3 69:16 215:21 277:17 | foodborne 232:9 | formulated 112:10 112:13 formulating 72:22 formulations 286:12 forth 77:14 289:16 324:9,18 325:2,8 325:11,21 328:8 335:5 |
| Finley 67:1 71:2 | first-stage 298:5 | focuses 54:17 | foods 9:9 67:22 88:10 139:19 142:12 158:4 171:17 216:7 244:15 254:16 321:16 323:12 361:10,11 370:2 370:16 377:16,18 380:11 382:1,7 387:5 392:15 | Fortmuller 381:16 395:17 fortunate 25:10 Fortunately 265:1 270:4 318:15 Forty 281:15 forward 4:10 5:2 5:19 14:20 25:15 29:2 44:2 48:3 56:10 65:10 84:16 102:12 106:22 114:15 146:20 186:1,5,12 196:4 221:5 256:18 295:14 299:13 329:6 331:15 342:7 351:4 367:14 |
| fire 77:4 81:21 89:1 92:20 100:12 104:4,12 109:12 114:20 117:21 121:21 122:17 123:5 127:18 130:22 145:14 146:2,18 148:4,10 154:19 155:5,20 182:10 183:1,19 186:8,13 187:12 187:16 188:9 190:10 193:3,11 214:4,6 224:10 236:17 237:22 246:4 257:12,16 259:20 260:4,17 260:20 262:6,14 263:20 264:18 267:10,13 268:2,8 269:6 271:8 275:13,15,17,18 275:20,21 339:16 341:1,3 350:9 | fish 8:7 230:6,7 286:15 | focusing 52:16 57:10 | footed 232:10 | for-profit 358:19 358:21 Foster 1:19 9:18,19 99:3 111:16 121:6 122:16 175:17 235:17 236:2,6,20 302:3 350:21 376:15 fostering 234:22 found 17:8 20:21 |
| firm 84:14 | fit 191:20 233:7 286:17 287:5 302:9,10 303:10 333:1 370:20 371:16 372:1 389:2 | folks 14:14 23:22 195:12 221:9 282:22 353:14 355:18 385:9 | footed 232:10 | |
| firmly 249:12 | five 20:1 56:12 59:10,22 72:6 232:18 272:7 274:13,20 281:16 349:15 385:20 391:3 | follow 112:9,13 187:14 188:3 201:12 204:5 260:14 265:15 | footed 232:10 | |
| first 4:11 5:9 24:10 31:15 36:5 41:14 57:9 66:22 74:12 83:13 84:5 105:19 116:14 126:19 143:12 144:17 161:8,10,18 191:14 192:18 204:17 207:5 | five-year 117:10 341:1 | followed 69:6 112:11 184:18 268:17 298:6 359:19 | footed 232:10 | |
| | flaming 175:16 176:18 177:5 | following 26:7 49:10 87:8 102:18 147:7 150:20 152:22 161:14 281:5 299:5 373:14 | footed 232:10 | |
| | flat 341:20 | follows 286:9 | footed 232:10 | |
| | flavor 254:5 | follow-up 20:9 130:17 156:5 214:2 | footprint 176:21 177:7 314:7 | |
| | flavors 317:5 | food 8:10 9:12,12 10:1 48:6 51:3 73:5 79:6,17 80:2 82:8 90:16,19 116:3 140:17 141:9 154:11,12 155:16 164:13 168:14,21 170:10 172:10,11,13 173:18 174:2,10 178:2 184:11 185:16 211:5,5 229:11 232:12,17 237:11 241:6 242:9,21 244:4 | force 187:19 forced 117:22 270:20 forces 174:20 345:5 forcing 113:12 foreign 176:8 forest 264:18 forget 279:20 form 8:14 42:7 61:9 280:16 formaldehyde 240:7 formalize 48:8 format 289:17 334:15 | |

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 115:19 140:12 161:12 162:4 196:15,22 203:19 213:6 250:8 254:6 270:8 274:6 289:3 366:20 369:9 Foundation 195:19 founder 161:2 founders 7:16 founding 195:19 200:4 four 6:15 20:2,22 21:6 28:11 51:4,6 105:19 135:15 232:9 256:13 287:12 299:16 336:15 385:12 fourth 9:19 four-minute 19:21 20:12 frame 117:10 118:11 frames 97:11 framework 76:16 355:9 framing 77:16 Francis 1:22 5:12 12:20 163:19 frankly 198:16 208:8 210:8 221:19 227:8 345:2 346:14 fraud 67:15 69:20 free 28:8 162:19 167:21 255:11 332:13 freely 70:9 375:20 frequency 164:2 224:18 frequently 98:9 fresh 317:21,22 friendly 66:10 friends 29:12,12 254:9 394:15 front 19:15 40:10 113:3 125:3 378:6 frost 17:9 270:1 | frost-free 269:22 frozen 254:2 fruit 7:14 11:11 31:22 77:9 100:16 102:13 105:4 110:10 111:12 114:14 124:18 141:1 142:22 155:11 179:22 196:13,21 208:1 212:2 214:1 224:19 225:2 249:18 252:10 257:13 258:8 270:18,21 271:2 271:16 272:8 350:16,18 Fruilicious 7:13 fruits 225:4 259:12 306:21 frustrated 346:14 347:12 frustration 97:22 Frye 143:19 Fujis 193:10 fulfilling 374:2 full 19:11 73:16 152:1 179:1 196:21 221:22 234:15 294:10 298:1 300:19 309:8,10 348:2 354:6 372:8 378:10,16 390:5 fully 89:10 344:6 Fulwider 1:19 11:1 11:2 fumigants 240:6 function 286:11 functional 315:2,4 315:7 316:17 functionality 255:13 fundamental 97:9 190:6 funding 33:14 46:20 117:7 | 126:14 fungicide 242:3 243:18 fungicides 113:16 115:2 further 21:17 22:1 22:18 86:8 97:15 97:19 167:9 183:12 194:13 208:16 239:2 256:9 293:21 295:18 331:2 339:10 343:20 Furthermore 289:10 fusion 43:5,7,9 future 44:12 49:13 50:12 58:14 61:5 79:5 84:20 114:16 135:10 152:17 185:3 186:1 198:10 217:10 268:4 294:7 313:11 319:5 334:17 336:5,21 390:17 | Gaston 377:9 gastrointestinal 139:18 gate 351:22 gateway 33:12 gather 76:4 gathering 151:16 329:14 gauging 219:2 Gauthier 85:12,12 gavel 136:13 244:22 GE 326:9 329:16 gears 341:13 Gee 123:2 gene 156:21 224:7 238:7 343:9 345:7 general 61:9,11 106:4 111:5 138:21 155:18 170:10 177:1 213:7 264:4 306:5 310:22 326:7 331:4 362:5 383:5 generally 67:11 103:1 120:6 210:16 259:6 292:14 306:9 326:5,21 327:13 328:1 generate 240:8 generic 44:9 107:7 112:12 generically 280:17 genes 156:22 genetic 76:7 106:9 106:16,19 165:17 223:21 333:19 343:13 361:22 genetically 165:16 240:20 367:13 genetically-engin... 167:12 239:21 323:5,8 382:1,7 383:10,22 384:12 genetically-modi... 45:9 162:12 | 320:17 321:14,20 322:4 Genevieve 85:14 85:15 geographic 87:13 geographically 350:17 German 203:17 Germany 109:18 getting 16:20 25:21 33:17 54:1 104:17 138:10,10 153:9 193:22 195:14 204:1 218:13 304:4 343:7 344:4 393:4 ghosts 17:15 gift 79:15 gifts 38:17 give 6:3 16:11 17:10,11,13 18:20 20:13 28:12 31:9 74:9 75:15 84:5 110:16 119:4 123:9 134:4 137:14 160:14 165:11 175:10 181:22 188:2 192:17 198:20 218:22 234:2 246:17 267:22 284:3 343:15 345:14 361:19 370:12 389:17,18 given 23:4,5 92:5 113:4 133:2,13 135:10 141:10 157:21 158:6 180:8 185:6 199:9 210:22 216:5 233:5 315:12 329:19 356:19 358:6 371:1 gives 188:6 279:11 280:8 284:21 353:9 giving 126:17 |
| G | | | | |
| | | Gabriella 160:8,9 205:10 gain 23:19 38:18 134:22 353:13 359:1 gained 136:20 gains 79:17 Gala 269:1,2,4 Galas 193:10 272:22 Gallegos 154:3 160:4 game 63:16 gamut 90:11 gap 390:3 Garcia 85:19,21 Gard 160:5,5 gardens 270:17 gas 10:21 29:1 | | |

| | | | | |
|--------------------------|----------------------------|-------------------------|---------------------------|---------------------------|
| 186:20 187:3 | go 4:4,10 5:8 19:12 | 82:18 84:15,17 | good 6:19 7:7,18 | 175:13 |
| 188:5 273:6 354:9 | 22:1 30:19 41:15 | 85:15,15,16 100:5 | 8:16 9:5 10:13 | grandfathers 383:7 |
| 354:14 | 41:21 47:1 49:11 | 103:9,13 104:4 | 11:9,22 13:13 | grandmother |
| glad 14:6 22:3 | 58:17 62:15 68:20 | 108:14 114:15 | 14:2,22 15:7 16:3 | 381:19 |
| 234:14 273:20 | 68:21 93:16,19 | 115:14 122:12,13 | 25:6,7 30:4 32:14 | grandmothers |
| glitch 149:17 | 94:2 97:6 102:11 | 125:20 127:4 | 35:4,17 45:19 | 383:7 |
| global 34:5,10 | 103:14 113:4,8,14 | 128:9,20 129:4,16 | 51:7 53:11 54:8 | granting 241:1 |
| 106:13 107:18,21 | 115:17 126:15 | 130:3 131:19 | 54:18 56:2 73:7 | grapes 11:13 |
| 197:3 | 134:16 138:13 | 132:2 134:14 | 74:3 78:10,17 | 274:16 |
| globe 34:7 | 141:16,17 144:9 | 138:19 144:5 | 85:18 86:14 94:20 | GRAS 374:8 |
| gluten-free 254:3 | 145:19 158:20 | 154:2,6 160:17 | 102:1 109:7 111:1 | grasp 394:6 |
| GM 14:12 45:13,16 | 160:20 167:16 | 169:1 183:11,11 | 113:7 122:18 | grass-based 12:21 |
| 45:20 76:10,18,20 | 183:11 188:19 | 186:14,18 189:14 | 134:2 154:2 | gray 106:13 |
| GMO 3:16,20 6:8 | 198:12 202:10 | 192:11 193:18 | 168:21 172:18 | great 10:6 13:15 |
| 7:20 8:19,20 | 203:8 205:17 | 195:8 199:3,3 | 173:2,3 176:13 | 14:6,21 16:2 |
| 10:16 12:7,17 | 213:19 215:8,16 | 205:22 207:12,19 | 195:17 199:17 | 26:21 29:10 32:11 |
| 13:6 75:18 161:15 | 236:14 242:17 | 213:12 216:21,22 | 202:6 206:3 212:3 | 46:18,22 50:3 |
| 161:21 162:1,14 | 245:9 246:21 | 217:5,12 219:11 | 214:9 232:11,12 | 55:6 67:7 85:10 |
| 163:5 165:7,12 | 249:15 252:12 | 223:13 227:8 | 237:9 242:5 244:1 | 93:9 96:3 115:22 |
| 166:8 167:4,13,21 | 254:3 262:11 | 228:3 230:9 | 250:2 259:21 | 119:2 120:13 |
| 179:9,15 239:5 | 271:14 273:1,16 | 246:20,22 247:1 | 265:6 266:7 275:9 | 122:12 203:7 |
| 282:19 284:1 | 281:16 282:13 | 250:18 252:14,15 | 277:8 282:1 | 244:13 256:20 |
| 319:16 320:14,22 | 283:15 307:14 | 252:17,17,18 | 291:13 295:16 | 261:15 269:20 |
| 321:2,9 323:16 | 308:11 324:22 | 263:19 265:15 | 304:14 310:2 | 282:17 360:20 |
| 325:6,18 328:21 | 327:12 330:11 | 267:9,19 268:5 | 316:19 320:13 | 395:12 396:3 |
| 329:1 331:22 | 342:14 368:9,20 | 270:1,22 274:2,7 | 335:8,15 342:11 | greater 216:2 |
| 332:11 337:11 | 380:17 390:7,15 | 276:4 281:22 | 345:13 373:2 | Greek 161:6 |
| 344:12 346:2,8,17 | 392:13,14 394:8 | 283:15 284:9,20 | 377:6 381:8,15 | green 54:16 66:18 |
| 346:22 348:12 | goal 44:21 54:19 | 293:22 295:14,17 | 385:15 386:7 | greenhouse 302:15 |
| 361:15 362:8,17 | 164:12 228:21 | 296:3 301:2 | 393:5 | greens 176:1 |
| 363:16 365:7 | 229:1,3,6,10,14 | 306:19 314:11 | goodness 30:9 | greeted 143:8 |
| 367:4,9 368:6,7 | 333:14 | 315:5 318:16 | good-tasting | grew 98:13 180:5 |
| 368:17 | goals 204:4 228:22 | 319:21 320:2 | 260:19 | 244:13 249:22 |
| GMOs 75:19 | God 26:13 385:11 | 326:18 327:10 | Google 211:10 | 250:4 269:2 |
| 161:13,16 162:19 | 390:19 | 329:12 330:17 | gotten 50:10 53:9 | 369:12 |
| 162:22 163:9,22 | goes 14:19 21:2,11 | 331:6 334:9,10,13 | 248:7 319:2 | Griffith 150:5 |
| 164:12 167:6 | 39:16 135:5 141:1 | 335:22 336:3,16 | 346:12 | 153:14,15 |
| 179:19 322:16 | 223:5 243:8 | 338:1 342:14 | Gourmets 272:21 | groceries 252:20 |
| 323:11 324:2,10 | 264:18,20,20 | 349:21 355:18 | govern 290:3 | grocery 250:7 |
| 332:2,5,13,20 | 297:17 367:12 | 366:15 367:14,19 | government 34:21 | ground 201:22 |
| 333:2,4,15 346:5 | 392:12 | 377:13 385:17 | 38:19 185:14 | 279:22 344:5 |
| 346:10 353:17 | going 4:7 6:2 18:14 | 390:16 393:1,17 | 374:10 | 389:21 |
| 362:6,13,16 | 20:5,15 25:21 | 393:21,22 394:17 | grading 59:3 | grounds 152:21 |
| 363:22 384:6 | 27:20 30:19 31:9 | gold 163:2 220:9 | gradual 88:20 | group 4:22 7:21 |
| 391:13 393:18 | 31:10 41:13 48:8 | 222:11 346:9 | Grady 268:22 | 8:20 9:10 12:19 |
| GMO-contamina... | 52:1,10 54:13 | 353:16 385:9 | grain 347:4 | 14:11 15:6 16:2 |
| 362:15 | 60:2 66:16 74:8 | 390:10 | Granatstein 124:12 | 19:10 22:11 38:4 |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 39:6 56:3 71:10 112:20 206:6 254:22 275:3 335:16 groups 40:13 51:12 59:13 128:21 233:12 288:6 291:10 292:19,20 344:20 386:11,11 387:14 group's 39:14 76:11 grow 7:14 8:11 94:3 212:7 224:9 228:22 259:11 269:14 270:22 272:11,18 384:17 385:2 388:11,13 388:14 grower 11:12 51:12 59:12 77:2 93:4 104:10 112:20 117:16 126:8,14 127:14 148:18 175:20 176:9 185:15 190:15 274:11,15 275:1 growers 7:3 92:16 93:12,22 98:2 100:7,14,15,15 117:1,17,22 118:3 119:5 121:13 122:8 123:20 126:15 130:1,6,8 130:14 131:16,17 133:4 134:9,15 141:13 146:9 147:7,12 170:7,12 170:13 173:7 174:3,4,9 175:18 177:3 181:10 182:1 186:8 187:10 188:2 190:9 222:10 228:10 229:21 238:9,10 250:15 257:10,14,17 | 259:16,17 273:13 274:10 276:11,12 339:4,19 348:9 352:11 growing 79:5 139:1 151:19 237:13 244:14 257:7 264:2 321:9 322:5 387:20 grown 33:18 128:7 240:4,20 241:7 323:3 339:21 growth 32:10 50:7 135:10 152:17 184:8,14 200:6 323:4 guarantee 84:15,17 134:13 189:13 guardians 228:17 guess 21:21 27:10 71:4 135:4 157:16 193:21 210:19 215:12 267:12 276:15 307:8 316:8 351:1 guidance 14:19 42:1,3,8,10,20 43:13,19,20 44:4 44:14 45:11 51:11 58:4 77:17 85:7 89:18,20 90:2 144:14,19 180:8 186:3,21 187:16 187:18 189:1 231:7 233:4,22 234:4,6,11 239:16 312:5,21 313:9 325:15 334:14,15 364:7,11 guide 23:10 46:13 331:18 guideline 152:19 guidelines 37:22 38:11 48:10 289:19 290:2 356:20 guinea 267:2,5 | guns 184:2 guy 26:22 27:1,2 29:11 30:8 276:9 281:16 guys 13:22 27:3 91:11 104:10 177:13 227:11 307:5 342:4 351:9 389:1 Gwen 123:2 128:17 Gwendolyn 94:16 94:21 95:1 105:15 105:16 115:14,15 115:21 116:1 120:21 121:5 122:22 127:16 132:14 136:9 | 106:17 120:6 140:10 172:2 252:5 305:12,14 320:5 hands 20:6 72:19 handy 366:21 happen 119:14 125:2,5,20 209:15 213:10 227:1 274:2 289:2 290:4 320:2 355:8 392:19 happened 127:1 136:3 185:5 267:3 286:7 326:4 358:2 happening 126:5 131:22 132:5 175:7 181:2 267:13 328:4 353:4,18 happens 125:18 175:13 222:5 223:19 279:9 289:1 290:12,13 381:11 391:15 392:6 393:3 happy 6:18 10:5,5 17:16,16,17 29:11 29:18 232:22 330:15 345:16 382:16 hard 4:16 24:2,5 84:8,10 85:1 91:1 99:15 109:2 111:13 118:9 127:2 138:3 177:2 187:8 200:1 248:6 316:9 317:18 318:1 342:5 345:6 366:2 389:2,5 harder 115:7 hardest 15:15 hardworking 323:16 harem 177:11 harm 240:6 harmful 323:10 | 378:19,21 Harold 1:15 11:10 104:7 105:10 109:8 128:16 176:14 189:19 222:13 243:11 249:9 263:14 Harriet 172:22 178:11,14,15 182:6,7 184:5 188:11 189:20 195:6 harvest 17:12 349:10 harvested 102:13 155:11 212:2 harvesting 155:20 Harvey 139:9 hashing 80:7 hat 159:4,10 hate 202:13 378:9 hats 105:19 haven 197:10 Hawaii 5:21 150:14 hazard 132:17 hazardous 171:13 hazards 297:14 hazelnuts 27:16 28:5 head 206:5 heading 247:5 heads 304:2 heal 172:15 health 8:4 79:18 80:4 84:22 91:15 91:18 113:1 135:13 154:10,13 156:1 157:2,3 181:19 185:8 210:1 215:12 217:1,15,17 227:17 235:7 237:14,16 265:16 265:17 293:14 294:3 297:12,18 297:20 322:9 323:2 378:14,20 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

H

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 378:22 379:8 388:6 healthy 79:12 142:13,14 235:1 393:13 health/enviro...m... 380:1 381:3 hear 73:9 81:13 125:7 132:21 134:20 136:5 173:9 175:18 216:21 217:5,12 242:10 249:13 256:2 291:12 336:9 342:16 346:11 351:9 355:11 384:14 heard 17:19 85:8,8 91:11 98:4 130:20 133:15 143:12 217:8 224:16,20 235:18,21 236:3 236:19 245:1,3,4 249:13 276:4 279:1 281:7 312:20 335:18 341:1 344:18 385:10 396:7 hearing 20:3 131:15 132:18 280:3 338:11 347:14 354:22 385:19 393:19 heart 181:14 261:3 378:1 379:4 heaviest 114:21 heavily 115:11 183:2,7 heavy 254:11 374:9 hectare 340:12,22 headed 238:11 heels 281:18 heirloom 271:7 held 292:6,18 hell 32:7 hello 27:4,5 115:22 231:1 257:2 | 369:22 help 5:19 23:10 46:6 56:4 60:13 92:3 102:16 137:22 182:8,19 185:19 194:4 196:7,8 228:6 232:10 233:5,9 263:21 266:22 327:8 331:18 332:5 370:4 375:12 388:1 helped 79:17 83:3 291:10 helpful 14:16 66:8 77:16 156:15 157:5,17 319:7 335:18 368:14 helping 66:13 helps 203:12 hens 67:17 herb 317:22 herbicide 174:2,16 herbicides 323:6 herbs 312:15,16 heritage 27:14 Hey 27:3 83:6 Hi 27:5 142:19 159:3 210:13 211:18,19 263:15 273:9 337:18 356:1 361:8 373:2 386:3 hiding 394:12 hierarchy 180:12 181:6 190:18 191:6 192:18 high 80:9 141:6 194:16 212:17 229:3,13 234:1 268:17 270:5 321:12 341:22 386:15 higher 164:6 340:9 366:15 367:19 386:18 highest 123:22 | 361:14 highjack 356:14 highlight 304:21 336:1 highlighting 254:10 highlights 327:7 343:10 highly 5:5 146:22 359:15 highs 264:6 high-density 268:15 269:16 high-quality 196:11 high-risk 117:21 Hilton 1:10 hinder 22:4 Hispanic 386:12 historical 112:21 historically 119:20 302:18 341:20 356:16 history 92:6 108:3 109:5 168:11 198:14 239:9 275:12 286:3 365:22 hit 115:9 340:21 hits 225:20 hoc 3:16,20 6:8 7:20 8:19 10:16 12:7,15,16 13:6 14:12 75:18 319:16 320:15,22 323:17 331:22 347:5,8 hoed 176:9 hoeing 175:22 176:2,17 hold 30:20 80:9 186:14 216:6 225:10 311:12 322:19 385:17 393:16 holding 187:16 329:22 330:1 | holds 107:19 hole 384:2 holistic 200:10 235:3 holistically 191:7 home 117:13 Honey 272:22 honor 16:19 283:20 389:8 honored 10:9 Hood 257:4,5,9 259:8 Hoodes 74:2 78:15 78:17,18 83:11 84:11 hop 224:2 hope 16:3 19:12 83:2 116:13 128:1 184:14 234:10 244:2 258:22 262:17 263:8 264:19 265:11 301:8 303:14 313:10 333:9 334:18 354:13 377:3 381:6 387:3 hopefully 14:15 122:5 124:19 301:17 336:10 hoping 41:19 156:6 336:16,21 Hopkins 217:9 horizon 134:20 170:16 horizontal 238:7 hormone 8:7 hormones 81:11 323:4 horsepower 177:10 hoses 302:10,15 host 8:8 10:20 hosted 306:17 hosting 25:11,16 hour 282:14 hourly 18:7 hours 13:17 35:20 175:22 178:1 | 216:22 263:4 282:15 308:17 house 37:2 250:4 housecleaning 24:10 Huffman 160:6 huge 83:16 130:13 270:12 390:3 hulls 255:6 human 154:12 156:19,22 158:18 181:19 223:4,8 235:7 237:18 238:6 293:14 294:3 323:2 378:13,19 379:8 379:22 381:2 388:6 humans 72:2 212:21 322:8 humidity 194:17 hundred 83:17 hundreds 233:15 321:7 383:6 hurdles 96:7 hurt 259:18 husband 257:4 356:6 husbands 265:7 hydrologist 175:8 hydrosol 317:15 hydrosols 317:5 |
| I | | | | |
| Ib 256:22 277:3,4,7 277:9 280:13 IBA 235:11 ice 161:5 iconic 252:21 idea 30:14 200:11 203:7 274:1 275:9 334:19 343:22 348:13 360:18 366:10 385:15 ideally 324:17 ideas 56:4 325:11 identified 42:5 | | | | |

| | | | | |
|---------------------------|---------------------------|----------------------------|----------------------------|----------------------------|
| 287:10 | imperative 322:1 | improve 231:13 | 358:1 364:8 | indirect 280:5 |
| identify 36:14 | impetus 188:2 | improved 64:3 | 372:17 379:1 | indirectly 306:11 |
| 39:18 40:21 68:5 | implement 31:13 | 70:16 108:21 | inclusion 176:19 | individual 23:3 |
| 297:2 | 119:6 126:17 | 203:16 256:9 | incompatible 82:11 | 24:15 61:12 66:4 |
| identifying 33:9 | 325:14 | 356:15 | 106:10 239:4 | 73:12 108:1 |
| 55:19 150:1 | implementable | improvement 21:8 | incongruent | 149:20 236:15 |
| identities 68:1 | 65:7,8 | 21:16 55:22 64:15 | 230:11 | individually 310:13 |
| identity 240:18 | implementation | 80:16 198:22 | inconsistency | individuals 18:7 |
| 313:21 314:1 | 36:4 40:22 52:21 | 200:1 342:6 | 120:3 | induce 222:15 |
| 317:6,9,13 343:5 | 128:10 | 348:14,20 363:20 | inconsistent 53:7 | industrial 387:21 |
| IFOAM 106:8,8,18 | implemented 41:11 | improvements | 206:18 | industry 13:21 |
| 106:20 107:5,10 | 50:3 88:7 89:10 | 120:5 139:17 | incorporate 298:20 | 19:14 68:16 69:13 |
| 107:13,15 | 161:15 163:6 | 229:14 | incorporated 148:9 | 104:5 113:3,19 |
| IFOAM's 106:6 | 165:3 | improving 277:15 | 148:12 | 116:15 140:5 |
| ignore 172:5,12 | implementing | inability 76:4 | incorporating | 154:9 162:1 184:8 |
| ignores 357:2 | 42:13 51:15 98:17 | inadvertently | 234:12 | 227:9 239:1 |
| ignoring 98:3 | 145:13 | 376:5 | incorrectly 141:2 | 244:16,19 246:9 |
| illegal 373:10 | implications 119:8 | incentive 209:7,19 | increase 118:5 | 254:21 259:7 |
| illness 153:18 | 197:3 | incentives 214:15 | 134:8,10 135:1 | 274:9 352:22 |
| illogically 173:17 | implies 82:4 | incentivizing | 146:16 313:5 | 353:1 379:20 |
| ill-informed 259:3 | importance 89:15 | 112:16 | 341:17,19 368:9 | ineffective 89:6 |
| imagine 155:22 | 161:22 257:13 | inches 248:22 | 368:11 | inert 69:16 72:21 |
| 231:5 265:6,12 | 259:4 322:12 | inclined 294:1 | increased 103:7 | 112:10 169:5 |
| 272:10 309:13 | important 4:17 | include 47:14 | 256:4 367:16 | 171:2,3 292:13 |
| 350:13 | 20:4 31:17 32:17 | 56:12 75:22 77:18 | 369:16 382:8 | inerts 7:21 15:6 |
| immediate 62:17 | 33:4 63:1 180:20 | 146:15 163:3 | increases 162:15 | 71:8,9,14,21 |
| 62:19 | 181:1 210:14 | 276:19 286:1 | 367:3 | 72:14 73:12,14 |
| immediately 62:9 | 212:9 216:19 | 288:1,7 305:6 | increasing 51:19 | 80:14,15 83:15,15 |
| 62:11 171:12 | 219:4 223:8 231:8 | 307:21 323:17 | 362:9,18 364:4,5 | 292:10 |
| immobilizes 302:22 | 237:17 255:17 | 342:19 371:13 | increasingly 162:9 | Ineska 94:17 |
| impact 57:11 | 268:12 273:5,7 | included 89:18 | incredible 35:19 | inevitable 258:17 |
| 128:19 129:2,6 | 323:8 327:12,17 | 142:4 144:18 | 119:9 121:22 | infection 87:7 |
| 133:9 135:7 | 327:21 328:5,12 | 149:22 292:17 | 217:1 388:5 | 115:12 169:20 |
| 176:19 201:15 | 329:2 342:3 352:6 | 306:3 | incredibly 216:18 | 237:18 267:13 |
| 210:21 222:19 | 356:19 377:22 | includes 103:16 | incrementally | infections 169:22 |
| 286:2 321:11 | 379:11 389:10,22 | 169:19 180:12 | 255:21 | infectious 157:1,14 |
| 381:3 | importantly 314:7 | 305:17 346:2 | indefinitely 238:10 | 217:12 |
| impacted 351:22 | imported 73:4 | 371:10 378:10 | independent 7:2 | influences 358:13 |
| impacts 133:10 | 152:8,12 218:13 | 380:16 | 277:10 374:13,14 | inform 37:13 |
| 177:14 228:10 | imports 67:12 | including 5:7 37:11 | independently | information 36:16 |
| 287:4 378:14 | imposing 332:11 | 61:10 89:16 | 259:17 | 37:11,16 46:5,8,8 |
| 379:9 380:1 | impossible 375:22 | 103:20 108:5 | India 67:13 | 46:22 48:19 49:4 |
| impair 39:13 | impression 123:8,9 | 140:14 161:4 | indicate 87:6 | 49:9 60:7,10,19 |
| 357:10 | 360:21 | 193:6 231:14 | indicated 67:8 | 61:9 62:7 63:6 |
| impairs 357:18 | improper 38:16 | 241:3 285:15 | 93:16,17 236:15 | 75:2 76:5 92:15 |
| impart 229:11 | improprieties | 297:4,14 305:7 | 365:13 | 123:13 128:6 |
| impediments 99:5 | 67:21 | 329:15 330:18 | indications 130:20 | 131:12 141:18 |

| | | | | |
|--------------------------|----------------------------|----------------------------|-----------------------------|----------------------------|
| 151:16 182:9 | 311:4,5,16 313:20 | inspector 7:11 9:4 | 270:19 | 351:7 386:22 |
| 193:21 196:20 | 314:2,5,12,14,18 | 51:12 61:16 187:1 | integrative 183:20 | interesting 221:8 |
| 215:4 218:21,22 | 314:21 315:1,6 | 188:21 189:10 | integrity 8:12 9:12 | 260:18 261:10 |
| 219:14 241:19 | 316:1,3 318:18 | 277:10 278:2,12 | 10:1 52:5 54:11 | 299:18 317:14 |
| 243:2 245:1 249:8 | 320:3 363:1,3 | 279:5,12,14 280:8 | 54:14,18 56:15,16 | 387:6 |
| 267:6 276:1 | 372:16,17,17 | 280:10,20 281:1 | 56:18,20 57:9,11 | interests 10:20 |
| 284:11 285:4 | 373:20 374:16 | inspectors 59:9 | 63:4 66:6 68:18 | 38:7,8,9 39:1,3,3 |
| 288:15 289:2,7,18 | 378:11,17 379:22 | 60:16 148:7 234:7 | 78:21 133:10,11 | 39:14,18,20 40:7 |
| 293:19 295:2 | 380:5 381:1 | 277:12 278:1,15 | 135:8 228:20 | 40:11,12 79:4 |
| 296:16,18 305:20 | inherent 22:12,13 | 278:21 279:2,21 | 229:4,13 233:20 | 141:17 257:9 |
| 306:22 307:21 | 22:14 142:12 | 280:2,12,15,18 | 234:5 254:5 | 387:9 394:21 |
| 308:4,15 311:13 | initial 44:18 301:5 | inspire 178:16 | 321:22 322:11 | interface 133:2 |
| 330:21 331:1,8 | 305:7 381:21 | inspired 124:16 | 323:9 357:13 | interfaces 14:13 |
| 335:15 344:10 | initially 298:9 | 202:16 | 359:12 370:6 | interim 76:12 |
| 373:8 375:14 | initiative 49:15,17 | installing 233:9 | 371:21 383:17 | intermittent |
| 376:2,16 377:15 | 55:22 95:16 | instance 320:3 | intended 239:10 | 213:12 |
| 377:21 378:8 | 381:22 | 369:2 | 280:9 370:21 | international 51:18 |
| 379:7,13,21 | initiatives 55:15 | instances 300:9 | intense 5:1 8:10,11 | 51:19 105:21 |
| informed 156:7 | innate 268:7 | instigator 381:21 | intensive 8:5 240:2 | 106:21 153:16 |
| 207:20 215:10 | innovated 200:19 | Institute 7:17 67:4 | 387:21 | 195:19 199:16 |
| 377:20 378:9 | innovation 198:19 | 304:16 356:5 | intent 41:10 173:22 | 277:11 335:20 |
| informs 289:13 | 198:21 202:21 | 370:3 373:4 375:6 | 300:8 304:22 | 338:5 346:20 |
| ingredient 42:6 | 203:1,6 241:8 | 376:19 | 387:8 | internet 389:21 |
| 83:22 140:16 | inoculents 286:14 | institutional 198:2 | intentionally | 390:1 |
| 292:5,11 311:9 | input 5:2,3,5 18:19 | 201:2 | 364:13 | interpret 44:22 |
| 312:13 313:15 | 77:2 84:3 110:4 | instruction 44:21 | intentions 369:11 | interpretation |
| 315:17 317:12 | 151:2 276:22 | 59:18 60:18 61:3 | interacting 347:5 | 190:5 286:5,6 |
| ingredients 42:21 | 291:11 295:16 | 61:4,5 62:14 | interaction 287:17 | 309:3 334:14 |
| 43:1 47:3,4,10,14 | 303:14 334:6 | 77:17 144:13,19 | interactions 297:9 | interpretations |
| 47:20 48:2,5 | 336:14 375:9,16 | 203:12 | 303:12 | 201:7 |
| 69:16 77:11,16 | 396:18 | instructions 44:16 | interagency 37:2 | interpreting 280:3 |
| 82:19,20 83:10,19 | inputs 31:20 81:21 | 59:15,16 61:18 | 41:18 | interrupt 28:10 |
| 89:13,17 90:5,7 | 103:14,18,20 | 289:14 | interest 4:18 12:8,8 | 202:13 |
| 90:11 96:2,10 | 131:1 287:4 | insulted 359:20 | 22:9,12,13,14 | intersexed 8:7 |
| 112:10 116:6 | 374:17 | insurance 33:13 | 23:1 37:19,22 | interspersing |
| 119:19,21 120:13 | inquiries 258:14 | 385:15 | 38:1,4 39:2,4,10 | 194:22 |
| 140:11,13,14,14 | inroads 250:19 | insurmountable | 39:11,18 40:13 | intimate 29:16 |
| 140:19,20 144:9 | ins 69:9 | 99:18 | 68:10,14,17 | intimately 102:20 |
| 144:15 145:8 | insectaries 270:14 | intact 239:9 | 185:15 354:6 | intolerable 99:21 |
| 149:13,18,20 | insects 286:17 | intake 278:17 | 356:11,15,21,22 | intrigued 202:16 |
| 164:20 169:5,6 | insider 248:13 | integral 184:7 | 357:2,4,5,6,8,9,14 | introduce 5:14 |
| 171:2,5,7,11,15 | insight 291:14 | integrate 95:16 | 357:16,18 358:4,7 | 13:11 272:13 |
| 171:16,16,19 | inspected 53:17 | 228:10 | 358:9,11,13,15 | 375:18 |
| 172:4 179:2 | inspecting 280:19 | integrated 109:21 | 359:11 360:7,9,19 | introduced 202:18 |
| 241:10,22 292:8,8 | inspection 280:16 | 184:1 189:22 | interested 157:20 | 269:1 |
| 292:13 305:19 | inspections 15:22 | 190:2,8,13,17 | 166:7 167:9 | introduction |
| 310:12,13,16,22 | 34:13 | 191:18 192:6 | 271:11 330:20 | 321:19 331:22 |

| | | | | |
|----------------------------|-----------------------------|---------------------------|-----------------------------|---------------------------|
| invasive 322:14 | 258:14 260:5 | 255:16 | 352:8 368:18 | Ken 123:17 124:11 |
| invested 185:17 | 284:22 285:9 | jargon 107:4 | 376:14 | 132:1 |
| investigated 256:11 | 294:8 307:14 | Jay 1:18 7:19 83:5 | Johns 217:9 | Kentucky 10:11 |
| investigating | 328:14 329:3 | 91:3 99:2 112:14 | Johnson 123:18 | kept 68:2 290:12 |
| 254:19 | 332:22 335:21 | 132:11 133:20 | 124:11 132:1 | 293:3 320:17 |
| investigation 83:18 | 337:5 340:19 | 147:18 156:3 | joining 273:10 | Kernel 272:19 |
| investigations | 356:11 363:6 | 166:5 184:4 199:7 | Jonagolds 273:1 | key 39:7 54:17 |
| 69:20 | 368:20 | 210:12 211:3 | Jones 157:7 | 55:18 63:2 125:22 |
| investment 35:4 | issued 45:6 | 228:2,14 273:8 | JOSEPH 1:17 | 127:12 128:8 |
| 185:16 203:22 | issues 8:9 9:12 14:9 | 284:13 288:13 | journey 384:1 | keystone 33:4 |
| invite 25:14 306:16 | 37:6 53:6 74:16 | 295:21 304:19 | judgments 34:15 | kicked 339:10 |
| invited 310:4 | 76:10 86:3 95:13 | 307:3 315:21 | Judith 160:12,12 | kid 26:21 |
| inviting 23:18 24:4 | 106:14 133:15,16 | 319:20 324:4 | 205:14 | kids 9:1,3 244:11 |
| invoice 279:8 | 169:3 173:8 183:3 | 327:8 331:13 | jump 66:16 342:1 | 245:15 249:11,19 |
| involve 74:21 | 228:15 233:22 | 386:2 | June 44:13 | 250:11 251:6 |
| involved 34:6 | 253:20 279:1,7 | Jean 1:21 8:17 | justification 284:21 | 304:9 |
| 35:15 36:19 41:17 | 289:19 297:3 | 14:10 17:2,4 18:1 | justify 255:19 | kill 223:13 257:21 |
| 53:16 54:10 68:8 | 298:2,3 300:2 | 102:7 127:15 | | killing 262:19 |
| 180:20 244:15 | 305:17 317:6 | 155:8 165:5 166:3 | K | kilograms 340:11 |
| 346:12 359:9 | 332:10 333:14 | 182:6 211:17 | Kane 138:8,9 | 340:22 |
| involvement | 338:3 342:19 | 212:3 250:22 | 143:18,22 144:2 | kind 17:3 29:14 |
| 168:11 246:8 | Italian 392:3 | 251:21 261:7,12 | 148:15 149:5,7,16 | 35:9 54:6 66:20 |
| 386:10,13 387:7 | item 252:21 269:7 | 316:21 350:2,16 | Kastel 356:3 | 102:6 121:6 137:6 |
| 388:18 | 292:6,15 314:14 | Jeanine 86:5 | Kastel's 360:21 | 140:17 142:11 |
| in-person 5:3 | 314:15 328:9 | Jean's 156:5 | Kathie 160:15 | 156:2 170:5 179:9 |
| IOIA 277:11,11 | 390:16 | Jennifer 1:22 3:17 | 205:15 | 187:15 248:15 |
| 279:3 280:12 | items 74:8,13 96:1 | 12:1 160:16 | Kathy 381:12,13 | 252:12 265:8,15 |
| IOIA-trained | 192:18 194:19 | 205:15 304:1 | Kayla 93:10 100:6 | 267:5 269:14 |
| 280:2 | 272:17 287:3,16 | 319:16 331:21,21 | keep 17:12 56:15 | 270:18 271:5 |
| Iowa 12:22 | 288:1 300:19 | 337:10 381:15 | 62:4 80:13 93:13 | 274:7 302:5,20 |
| irregular 97:12 | 370:7 371:11 | 395:17 | 161:16 181:13 | 303:19 347:18 |
| Island 24:22 | | Jessica 160:17,18 | 220:20,21 232:10 | 351:5 366:3,9 |
| issue 16:7 79:19 | J | 205:20 | 245:14 252:21 | 385:18 388:19 |
| 80:18 82:10 84:6 | Jackson 384:17 | Jim 97:20 | 255:11 285:16 | 392:19 393:13 |
| 91:18 98:16 | Jacobson 253:5 | Jo 206:1 230:21 | 321:12 322:2,16 | kinds 99:5 182:17 |
| 107:19,21 116:19 | 256:22 257:2,3 | 231:1 235:15 | 332:5,10,13 333:4 | 285:1 348:22 |
| 132:4 135:6,13 | 261:11,17 262:2 | job 10:17 16:2,18 | 338:17 340:5 | 393:18 |
| 152:4 181:19 | 264:1 266:1,7,15 | 80:5 230:14 278:9 | 354:17 361:14 | kitchen 253:7 |
| 187:5 196:12 | 268:9 273:11,20 | jobs 32:20 | 372:14 375:19 | 254:1 256:7 279:5 |
| 203:19 206:10,12 | 277:1 | Joe 9:6 93:10 | 376:10 380:4,19 | 281:20 |
| 208:8,10 209:4 | Jake 94:14 95:1,4 | 142:18 | keeping 53:12 | knew 121:18 207:6 |
| 210:1 213:16 | 100:4 101:19 | Joe's 216:5 | 135:22 321:14 | 207:13 266:22 |
| 214:3 215:21 | 102:8 104:9 | John 1:19 9:18 | 333:15 | 276:3 383:14 |
| 217:14 232:18 | 105:10 | 99:2 111:15 121:5 | keeps 16:6 78:8 | knocking 250:1 |
| 234:12 242:22 | James 85:19,21 | 122:20 175:17 | 174:9 | know 12:16 16:14 |
| 244:7 247:14 | January 44:18 45:4 | 235:16 257:4 | Kelci 337:15 | 20:11 21:4,13 |
| 253:21 257:11 | Japan 51:21 | 337:12,12 350:20 | kelp 42:4,4,8 | 22:19 23:12 25:10 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 27:9 29:15 30:16 32:6 41:20 50:17 53:17 75:7 80:11 91:21 92:3 93:2,4 93:7 110:15 112:7 113:14 114:8 121:21 123:13,19 124:4,5 125:11 128:6 129:21 130:3,9 131:22 132:4,14 134:18 136:22 139:14 153:10 156:7 157:16 158:7,16 160:18 164:10 165:7 167:1,10,19 171:1 173:19,22 176:5 177:3,4 179:15 181:7 182:2 183:14 184:6,12,15,17 186:18 187:1,4,12 188:11 189:14 192:2,22 194:18 194:21,22 195:1 197:21 198:16 200:9 202:20 203:8,9,12 205:21 206:11 207:5,10 207:10,14,17,18 208:4 213:11 215:16 218:4 219:2,3,6,9,10,11 219:13,20,22 221:8 227:13 228:14 235:11 236:11 241:7 245:1,19 246:19 246:22 247:2,17 247:20 248:1,2 249:4,21 250:2,3 250:6,12,16 251:19 252:5,11 252:20 255:20 257:17 258:1 259:21 264:7,17 265:14 266:15 | 267:7,12,14 271:4 273:12 276:18 281:19,22 290:22 292:12,20 293:16 294:21 296:8 298:8 302:17 303:5,8,14 307:6 308:20 315:9 316:7,8 317:21 325:11 326:10 327:3 328:17,20 329:10 331:16 334:18 335:22 337:16,16 345:1 347:15 348:15,22 349:3,8,21,21 350:12 351:1,4,5 351:8 352:11,19 352:19 353:6,11 354:12 360:6,9 362:14 366:1,2,2 366:4 367:8,15,16 369:1,2,10,11,14 380:18,20 382:18 382:19 383:13,21 384:21 385:1 387:21 388:10 389:1,6,18,21 390:11,15,16,18 390:18 393:11,15 394:12 395:1,5 396:18 knowing 122:14 157:16 262:18 308:20 379:1 knowledge 29:17 88:6 110:15 155:17 267:15 272:17 333:7 384:9 known 68:1 153:19 157:21 171:16 173:16 206:13 208:9 325:5,12 378:13 knows 248:14 285:12 303:10 | Koan 97:20 Korchman 160:6 Kritikos 277:5 Kyla 86:8,8,13,15 91:3 92:11 94:10 <hr/> L <hr/> lab 246:3 label 33:10 79:16 80:7 81:12 96:4 107:17 135:9 147:14 178:7 208:2 219:17 220:12 222:1,5 229:12 322:7 349:17 371:22 375:1 380:10 382:1,7 labeled 171:19 341:22 353:11 labeling 311:19 312:2,9,22 313:6 332:19 labor 271:21 lack 76:1,13 198:2 216:16 312:2 350:5 Ladies 193:9 lagged 130:21 laid 192:8 lakes 270:14 land 10:21 25:11 115:7 150:20 269:12 270:10 322:13 388:7 lands 234:2 landscape 52:20 76:1 language 55:12 148:12 173:19 201:18 231:18 361:17 languishing 69:21 70:8 large 70:6 71:17 177:7 194:7 240:8 242:13 248:7 | 253:7 254:1 256:1 343:2 larger 80:8 82:7 111:7 194:19 largest 361:12 large-scale 67:15 119:11 Larry 381:13,14,14 381:18,19 386:5,8 388:15,21 391:20 395:9,14 lastly 90:13 340:17 372:16 late 157:15 lateral 156:20 latitude 103:4 195:11 302:12 launch 40:22 41:1 launched 49:16 Laura 160:11 205:12 337:15,19 350:3 352:18 355:14 laureate 17:9 law 69:1,3 83:13 172:1,5 293:6 378:4 387:6,8 lawns 270:17 Lawrence 217:9 laws 269:12 lawsuit 139:9 lay 80:2 82:13,14 laying 67:16 lead 39:21 56:16 71:13 82:13 90:8 103:2 106:6 147:11 156:1 196:20 213:15 288:16 leader 10:17 13:4 leaders 393:9 leadership 321:4 leading 158:18 197:21 342:5 leads 57:7 154:12 leafy 176:1 league 69:20 | lean 16:22 learn 92:1 120:13 122:10 128:13 222:3 277:18 372:10 390:6,7 learned 128:12 180:6 261:15 382:20 learning 8:6 learns 223:17 leave 91:13 181:10 351:11 395:2 leaving 239:8 288:2 307:5 371:12 led 120:3 leeway 137:8 left 5:13 20:2 54:8 73:2 212:2 274:13 307:6 349:2 351:15 legal 83:21 85:4 284:22 286:6 354:18 374:2 length 97:1 127:21 lengths 254:4 Leo 392:3 lessen 193:3 lessening 191:21 lesson 83:14 lessons 198:8 letter 165:14 279:6 letting 68:10,22 let's 26:5 52:3 103:11,12 227:12 245:21 246:2 247:2,3 252:21 283:8 level 29:16 33:20 37:15 57:16 97:9 100:10 120:4,5 143:13 166:18,21 187:9 192:12 213:21 215:8 253:10 326:19 332:9 353:9 355:10 362:21 363:16 366:14,15 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 366:19,22 367:21 386:10,12,13 leveling 230:2 levels 72:3 96:13 213:6 223:14 254:6,10 255:6,22 325:13 343:16 363:7 Lewin 95:3,4 99:12 100:13 101:12 102:3,20 103:21 104:19 105:11 liabilities 75:12 Lianna 74:2 78:15 78:18 83:5,6 84:4 licensed 266:11 lies 241:20 life 250:16 256:15 260:15 265:20 278:1 lifting 174:1 light 21:1,3,3,11 66:18 133:3 249:8 272:1 342:11 356:17 likes 176:2 limit 163:22 213:7 306:7 limitation 150:22 limitations 354:19 limited 74:13,19 103:19 241:9 284:12 287:16 295:22 297:4,14 299:2 300:9 301:11 304:18 305:1,7,13 310:8 310:10 350:17 370:8 372:4 limits 63:5 346:21 line 88:2 97:7 101:10 254:3 341:20 365:11 385:17 393:16,20 395:1 lines 101:4,7,13,15 155:15 385:11 | link 65:17,20 243:1 364:10 Lipson 328:15 Lisa 2:18 15:1 138:11 230:22 237:7,10 242:6 243:21 277:6,6 289:11 list 6:4 15:3 44:10 46:2 48:9 50:13 58:13 68:12 73:15 74:20 81:16 82:21 90:14 94:15 98:12 98:14 113:8,12 140:15,18 145:6 149:21 171:6,21 181:7 191:3,13 199:11,19 200:12 200:14 209:17 214:12 226:13 242:18 243:15,19 248:5,8,21 280:21 283:2 285:11,19 285:20 287:3,5 293:11 310:17 311:7,8,14,15 314:1,14 323:17 371:19 372:18 377:18 378:11,16 378:19 listed 47:5 287:2,3 297:22 311:16 314:18 listen 323:14 listened 393:8 listening 261:3 389:12 391:5 395:11,15 listing 186:5 209:17 221:2 226:18,20 listings 50:21 lists 243:10 lit 121:21 122:17 Literacy 49:15 literature 133:7 157:19 158:19 | little 5:14 18:2 20:6 20:14,17 21:1,22 22:19 24:10 26:2 27:12 29:11,13 34:2,18 49:14 54:5 63:16 83:14 115:19 130:21 136:20 137:9 182:1 192:17,21 193:20 195:10,15 202:16,17 205:7 210:15 213:8 215:3 217:2,3 224:5 244:3 267:22 268:13 277:22 282:8,16 284:1 304:2 324:16 337:13 340:7 341:6,9 342:15 345:14 350:17 354:3 355:19 365:16 384:13 391:11 392:17,17 396:9 Livable 217:10 live 9:21 104:1 168:22 224:8 269:13 366:12 livelihood 146:6 lively 18:11 lives 30:8 177:22 livestock 6:5,11 8:19 9:14 10:11 10:16 11:3 12:12 12:14 13:6 42:4,8 42:22 43:2 44:11 45:10,15 51:2,16 69:18 154:9 155:2 158:16,22 159:13 159:21 179:11,18 180:3 197:8 224:17 225:2,8 226:1,3 280:4 287:4,18,20 288:5 298:16 303:1 305:11 306:4 321:15 371:15 | living 178:3 274:14 275:1 367:5,5,10 Liz 91:21 load 164:10 340:21 lobbies 358:1 lobby 68:11 lobbyist 356:6 370:4 373:5 local 27:17,21 28:6 203:20 304:8 locally 13:1 33:18 55:5 located 30:1 257:5 location 311:17 lock 153:11 logic 174:9 245:20 logical 90:19 logistical 75:21 284:15 logistics 15:9 16:9 18:2 logo 152:10 log-grown 287:1 long 35:19 59:1 97:6 108:3,12 155:21 164:4 168:11 182:11 184:19 204:11 208:13 209:12,18 226:14 248:22 267:20 272:3,11 282:16 302:8 315:6 337:2 349:22 358:22 372:13 longer 20:17 41:21 69:14 115:6 126:20 134:12 179:16 272:4 385:3 394:22 396:21 longtime 265:18 274:11 long-term 110:2 133:10 193:2 335:1 336:22 long-time 139:6 | 261:4 look 5:2 14:20 25:15 35:16 44:2 48:2,17 52:15 56:8,9 58:1 70:10 83:15 90:2 97:19 101:14 109:5 119:8 134:22 157:5 180:18,20 181:2 191:13 198:6 228:16 244:6 251:13 256:18 264:6,11 279:15 293:17,18 307:8 308:12 315:8 316:10 328:16 330:16 331:15 346:9 348:7 351:18 358:5,14 364:9 391:21 looked 91:11 133:5 133:6 150:2 213:22 274:7 314:18,21 317:18 looking 23:18 51:20 54:15 55:17 102:13 114:9 124:1,4 126:10,13 129:17 134:21 160:13 181:5,20 188:1,7 189:12 191:7,22 196:4 213:4 218:2,10 221:4 245:19 267:8 281:13 310:22 312:8,18 315:3 324:14 328:5 329:11 334:16 338:21 346:2 351:2 354:10 390:20 looks 29:11 160:19 314:20 lopsided 229:7 lose 54:14 117:2 134:22 181:12 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 260:2 263:4,13 352:11 losing 237:15 345:3 352:16 loss 67:5 118:7 127:8 154:16 218:10 258:18 262:11 lost 262:8 275:18 275:19 lot 4:22 13:22 29:12,17 31:7 34:8 35:4,17 42:1 46:7 49:18 50:9 50:10 51:6 57:22 83:13 92:13 99:19 111:4 122:8 131:9 131:10,11,13 132:19 142:20 154:9 155:17 159:10 177:3,5,9 177:20 183:13 188:12 195:3 206:22 217:3 218:6 244:12,21 245:1 248:1 252:7 267:6 269:4,20 275:18 288:11 292:22 303:20 317:10 318:15 327:11 335:7 337:5 347:14 350:17 353:14 382:21 383:2 384:6,14 385:3 390:2,6 396:7,8 lots 31:17 32:22 34:5,14,15 53:3 60:1 78:2 281:8 335:15 loud 21:12 Louisiana 10:15 16:1 Louisville 25:13,14 25:16 love 16:2 184:6 272:18 394:14 | loves 125:19 177:17 low 223:13 264:19 367:21 lower 192:12 213:8 lows 264:6 low-level 238:3 lunch 137:14 138:2 195:7,13,14 202:4 202:6 204:17 205:13 244:11 245:18 250:9 Lundberg 254:21 luxury 195:12 230:21 396:7 Lynn 160:6,6 <hr/> M <hr/> Mac 1:12,15 3:3 5:18 10:7 24:9 37:19 282:1 284:8 319:18 320:13 337:8 macro-sized 364:14 main 99:7 111:10 292:7,10,16 294:16 295:3 297:2 mainstream 8:13 maintain 35:12 52:4,13 114:15 137:8 228:21 229:3 230:15 231:13 237:21 323:9 maintained 78:21 maintaining 53:16 56:22 64:14 66:8 66:9 77:8 321:21 maintains 228:19 maintenance 75:11 majestic 244:3 major 69:19 79:17 158:21 265:16 271:16 majority 82:3 | 96:18 102:19 170:4 207:17 makers 347:21 making 24:4 68:7 98:4 196:4 277:20 289:9 317:3 320:19 MALE 26:11,15,19 27:2,5,17,20 28:5 28:9,17,19,22 29:6,10 30:3,7,11 30:18 man 266:3 267:11 manage 7:1 268:2 339:13 manageable 83:21 120:15 managed 127:21 management 6:17 64:16 173:9 190:1 190:3,13,17 191:18 273:16 339:16 manager 15:3 175:11 361:9 manages 278:11 managing 20:9 175:16 mandate 248:19 328:16 mandated 362:16 mandates 252:13 manipulate 248:9 manned 247:17 manner 45:2 52:5 98:21 128:14 manual 48:15,21 180:9 290:3 296:12 298:21 300:22 307:10 manufacture 165:15 299:9 379:20 manufacturer 363:1 manufacturers 108:13 165:14 | 313:4 373:22 374:4,6,18 378:16 380:3,4,13 manufacturing 292:18,22 297:11 378:12 map 279:15,17 maple 8:21 mapped 329:17 Maravell 1:20 12:9 12:10 84:4 92:11 100:4 101:9 110:6 114:7 123:2 126:1 166:3 188:11 224:15 236:10 237:1 267:18 352:18 354:2 365:6 368:3 391:8 March 37:20 42:9 44:21 50:1 Marcus 356:3 margins 259:14 mark 328:15 329:3 359:22 360:21 marked 380:12 market 9:9 13:1 51:19 53:2 57:9 57:14 71:18 77:9 107:18 108:15,16 114:4,13 115:3 123:6 130:10 135:10 146:8 172:13 176:1 179:13,16,17 199:2 220:7,17,19 220:22 221:6,22 230:3 241:16 252:10 295:4,5 313:5 349:9 353:2 355:5 marketers 33:21 marketing 1:1 46:8 52:1 53:21 81:8 111:12 271:3 marketplace 79:10 79:16 125:18 145:21 193:8 | 197:17 198:19,20 256:4 258:21 311:20 313:6 343:18 346:16,19 347:2,17 352:21 markets 138:18 145:2 255:17 271:14,17 Marshall 86:5 161:8 mass 278:19 massive 67:12 material 23:4 45:14 77:6 87:5 88:19 89:2 90:10 92:7 97:4 104:15 113:5 120:18 128:15 130:3 139:5 145:11 146:14 173:12,14 174:9 176:16 177:13 181:8,21 192:2,13 226:17 226:18 238:2 243:19 297:2,5,7 297:10,12,22 298:17 303:22 309:4 310:16,18 311:1,5,7 314:22 315:3,18 316:9,18 358:15 361:22 370:20 377:20 378:21 materially 70:16 materials 3:9,13 6:12 7:16,20 9:14 10:16 11:3 12:4 15:5 36:8,10,15 36:17 37:10,14 43:15,15,17,20 44:3,5,6,8,10,11 45:10 51:16 68:11 69:12 70:17 74:12 76:22 78:1 81:15 88:12 89:21 90:12 90:18,20 97:11 100:12,22 102:22 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 103:7,8 104:21,21 106:4 111:17 114:3 116:21 117:15 119:6 121:13,14,15,16 122:10,15 124:2 125:22 126:11,18 131:18 132:4,8 145:7 146:17 147:2 157:9 173:21 180:3,13 180:17,19 181:1,4 181:5 186:6 191:12,22 200:8 200:17 208:14,21 209:1,5 214:6,11 214:18,20 228:17 229:2 241:10,12 242:1 248:4 282:12,19 283:16 284:1,7 286:1,20 287:6 297:8 301:20 303:4,9,10 303:11 304:5,16 305:12,14 307:14 307:15 310:6 311:3,6,13 317:4 355:19 370:10,12 371:2,9,15,18 372:1 377:14,17 378:17,18 | matured 180:2 matures 23:17 maturity 21:20 maximum 362:21 ma'am 21:9 138:14 McEVOY 2:12 3:6 13:13,14 25:20 31:6 65:16,19 69:7 356:13 359:21 McEvoy's 69:3 meal 230:7 meals 254:2 mean 26:19 29:20 54:21 63:13 83:12 94:22 104:17 110:22 113:6 114:19 131:22 148:19 164:4 187:18 192:9 193:1,4,8 195:2 199:11,21 203:10 204:9 222:22 225:13 229:16 230:6 271:8 273:2 294:19 303:18 316:5 327:18 354:13 358:9 371:17 383:1 384:11 390:22 392:1,2 394:4,5 395:4 meaning 91:8 229:4 meaningful 163:4 278:1 meaningless 294:20 means 107:1 135:10 150:1 190:14 277:11 358:10 382:19 383:2,4,21 meant 286:1 306:9 354:9 measure 105:8 135:6 343:2 | 363:19 measures 149:3 212:1 232:20 meat 207:13 216:3 216:6 meats 216:8 252:19 mechanical 125:10 189:5 190:20 mechanics 16:8 mechanism 41:2 226:1 mechanisms 158:8 media 135:19 256:3 259:3 374:11 median 239:7 medical 217:19 medically-impor... 223:4 medicine 223:8 medium-sized 259:17 meet 33:14 57:13 63:18 79:14 108:15 121:19 171:17 172:4 229:5 238:2 240:16 278:16 341:4 349:9 355:4 389:20 meeting 1:4 4:5 14:21 15:14 16:3 17:4,7 18:3 19:20 24:12 25:11,16 40:1,2,4,10 52:9 58:18 70:17 74:8 91:22 132:21 196:10 206:15 210:14 220:9,13 222:11 239:19 244:22 258:4 277:16 295:20 296:4,7 324:9 326:6 331:16 336:9,15 347:16 382:3 387:19 391:2 | meetings 16:9 24:8 72:15 375:21 388:22 389:9 meets 79:20 220:18 353:8 377:21 Melissa 2:16 14:3 51:4 member 5:12,17 6:10,19 7:7,18 8:16 9:5 10:13 11:1,9,22 12:9,20 17:5 23:4 24:9,21 39:4,6,11,13,21 65:18 73:8 83:6 84:4 91:4,9,14 92:5,9,11 93:11 99:3 100:4 101:9 101:19 102:8 103:11 104:9 106:8 109:9 110:6 111:16 112:15 114:7 121:6 122:16 123:2 126:1 127:16 128:17 129:13 130:17 132:13 135:3 136:7 141:21 142:19 147:19,22 148:22 149:6,9,11 155:9 156:4,14 159:3 163:20 164:14,18 165:6,18,22 166:3 166:6 167:8 176:15 177:12 182:7 183:17 184:5 187:14 188:11 189:20 192:4 193:18 195:20 199:8 202:12 210:13 211:18,20 214:2 215:1,5 217:21 222:14 224:15 228:4 235:17 236:2,6,10,20 237:1,3 242:7,13 | 243:12,16 247:12 249:10 251:1 261:8,13,18 263:15 265:21 266:2,10 267:18 273:9,12 278:10 284:8,17 288:13 296:1 301:19 302:3 303:3 307:4 308:2,6,19 309:17 315:22 316:12,20 316:22 319:6,18 319:21 320:6,9,12 324:8 331:19,20 337:7 340:18 342:14 345:11 350:3,21 352:18 354:2 356:4 357:9 358:3,5,9 360:5 360:13,16 365:6 368:3 370:2 373:3 376:15 382:11 386:3,6,9 388:16 391:6,8 members 1:14 5:7 14:9 15:4 16:15 18:13,18 19:1 21:5,18 22:8 38:2 38:16 39:18 115:18 116:4 136:13,20 168:10 189:15 205:4 283:14 302:1 323:16 331:12 346:11,13 348:3 355:1,11 358:1,11 359:9,15 374:1 375:10,20 376:1 395:12,22 397:2 member's 357:11 357:19,22 358:14 memo 37:21,22 38:11 39:16 43:4 43:8 47:7 48:8 49:11 356:12,17 359:20 memorialize 198:5 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|---------------------------|---------------------------|---------------------------|---------------------------|--------------------------|
| 198:8 | Miami 30:8 | million 67:16 | mitigated 255:2 | 252:9 309:15 |
| memorializing | Miars 304:11,14,15 | 231:22 | mixed 193:21 | 336:20 342:2 |
| 307:16 | 307:18 308:3,10 | millions 272:15 | 294:11 | monumental |
| memory 198:3 | 309:11 | 322:8 | moans 279:1 | 117:11 |
| 201:2 | mic 65:15 | mimics 280:17 | model 126:11 | mood 26:1 396:12 |
| men 264:16 265:22 | Micah 143:19,19 | mind 30:20 78:9 | 148:4,11 168:16 | Moore 168:4,5,5 |
| 266:18,19,22 | 143:20 | 126:6 261:3 262:4 | 198:21 200:5,20 | 172:22 173:2,3 |
| mention 242:11 | Michael 178:14 | 275:14 338:17 | 216:7 237:5 | 177:2,17 |
| 277:22 306:2 | 195:6,16,18 199:7 | 340:5 | 264:11 267:9 | morning 6:19 7:7 |
| 326:3 | 199:8 202:15 | minds 353:16 | models 87:6 236:18 | 7:18 8:16 9:5 |
| mentioned 37:20 | 204:14 217:7,10 | mine 162:9 | 260:11 264:7 | 10:13 11:9,22 |
| 101:21 109:10 | Michelle 2:14 15:8 | minerals 42:22 | 265:14 268:17 | 13:13 14:2,22 |
| 148:1 154:16 | 16:5,11 18:5,17 | minimal 286:2 | moderate 264:19 | 15:7 74:3 78:17 |
| 189:21 202:19 | 19:18 20:21 21:14 | 287:17 | moderating 299:22 | 86:14 137:12 |
| 218:1 265:22 | 24:3 66:17 85:22 | minimize 63:7 | modernized 46:1,3 | 173:3 195:17 |
| 289:22 306:1 | 86:1,9 137:19 | minimizes 80:21 | 46:15,17 | 270:1 290:1 |
| 308:20 316:11 | 138:10 153:10 | minimum 246:7 | modification | 396:16 397:5 |
| mentions 379:10 | 160:16 396:17 | minor 57:6 120:7 | 165:17 | Morris 217:13 |
| menu 27:8 | Michelle's 66:21 | 279:7 | modified 165:16 | MOSA 52:8 74:4 |
| mess 385:19 | microbiological | minority 87:21 | modify 312:12 | 74:13 75:2 77:10 |
| message 63:3 82:3 | 112:2 | 169:18 237:20 | module 49:21 | 299:21 |
| 82:13 117:13 | Microbiology | minute 395:18 | moisture 260:12 | MOSES 178:16 |
| 203:20 258:7 | 157:10 | minutes 19:22 20:1 | 264:8 | 233:11 |
| 260:16 | microcrystalline | 20:3,22 21:6 | molecule 178:2 | mother 251:20 |
| messages 116:13 | 286:22 | 23:15 24:8 86:13 | Molini 78:16 | 390:6 |
| 119:18 193:21 | microorganisms | 137:5,7,16 138:1 | mom 244:10 | mothers 383:6 |
| met 297:22 298:2,3 | 111:22 | 138:2 281:16 | 249:11,17,19 | 393:7 |
| 372:7 377:19 | microphone 284:6 | 282:11 326:13 | moment 128:18 | motivation 203:13 |
| metal 254:11 | mid 17:20 | 385:12 | 152:7 218:1 | motive 333:6 |
| meteor 17:19 | Midwest 67:8 74:6 | misconception | 292:10 | Mountain 67:7 |
| method 43:8 76:7 | 110:9 | 169:10 | momentum 80:14 | mountains 244:5 |
| methodology 142:3 | Mid-Atlantic 86:19 | misdirected 159:19 | momms 245:17 | move 5:19 13:10 |
| 143:1 | Miedema 237:7 | misinformation | 247:13 252:11 | 46:19 52:3 54:3 |
| methods 12:18 | 243:21 244:1 | 135:20 | 383:19 393:11 | 54:15 56:10 78:14 |
| 14:11 33:9,11 | 247:17 249:21 | misnomer 225:6 | MONDAY 1:7 | 106:22 115:7 |
| 45:6,8,14,17 | 251:19 253:3 | misrepresented | money 4:17 46:21 | 146:19 179:18 |
| 75:20 76:2,4,15 | Mike 17:5 | 258:5 | 269:8,10 270:7 | 190:21 194:18 |
| 89:1,5 100:12 | miles 2:12 3:6 | missed 133:16 | 298:4 | 225:22 329:6 |
| 106:1 107:3 179:5 | 13:11,13 21:21 | 304:20 | monitored 193:1 | 338:15 351:16 |
| 239:7,9,20 294:15 | 23:15,22 25:19,19 | misses 80:22 | 321:6 | 376:11 |
| 297:11 320:21 | 30:1 65:14,22 | missing 9:1 279:8 | monkeywrench | moved 194:6 |
| 321:4 322:11 | 66:1 195:22 | 279:10 377:22 | 204:7 | 199:16 349:10 |
| 323:20 325:6 | 277:15 289:22 | mission 106:6 | monocultures | 353:20 |
| 326:17,21 333:18 | 377:8 | 133:4 320:14 | 195:1 | movement 382:7 |
| 336:19 361:17,21 | milk 12:22 27:15 | Mississippi 161:9 | month 207:3 | 395:18 |
| 362:3 | 161:5 252:16,17 | mistakes 172:6 | months 13:18 42:3 | Movements 105:22 |
| Mexico 24:13 | Miller 85:17 | mistrust 97:17 | 124:5 143:11,14 | moves 29:1 351:4 |

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| moving 41:5 79:17 145:3 160:13 186:11,17 227:2 299:13 347:22 364:11 383:3 | 364:3,5,8,18 390:19 | necessarily 131:19 136:2 244:8 330:3 334:21 387:11 | 388:1 396:17 | new 5:11 23:19 24:12 42:1,3,7,10 42:20 43:4 44:16 44:20 45:3,22 50:20 59:14,15,18 61:17 62:14 69:12 81:22 116:21 117:18 119:6 122:3 126:11,11 126:18 131:18 145:22 187:3 201:3,5,19 239:12 249:8 278:16 279:17 324:20 334:9 374:7 394:2 |
| MRO 120:5 | narrow 218:2 | necessary 164:16 241:9 313:16 331:10 362:8 378:8 379:13 | needed 36:16 46:4 75:13 76:19 117:16 119:5 120:5 134:5 239:6 255:7 291:16 297:3 300:7 305:8 311:6 328:1 | newly 117:14 |
| MSB 243:1 | NAS 352:13 | nectarine 229:20 | needing 302:14 | news 67:4 254:8 345:13 393:5 |
| Mt 257:4 259:8 | Natasha 154:3 160:4,5 | nectarines 229:16 | needle 17:20 | newsletter 189:14 |
| mulch 175:14 | nation 67:7 | need 20:17 24:7 46:17 52:14 53:20 62:3 63:1,6,15 64:3,4 72:6 76:16 81:17 84:13 91:10 97:19 104:18 108:15 116:18 118:14 122:10,11 125:17 132:16,16 132:20 142:13 149:20 164:21 165:2 173:10 175:12 177:10 179:8,15 180:1 181:4 186:11 191:13,15 193:13 193:14 194:2,4,11 196:7 198:4 200:9 202:1 204:8 220:20,21 221:6 221:22 227:13,17 234:6 241:22 246:5 262:4 263:11 267:9 281:12 282:11 284:15 285:5 286:21 291:18,19 294:10 296:19 300:19 303:6,18 309:7 310:17 311:9 313:10 318:21 321:11 325:3,15 326:20 330:21 342:7 347:21 351:11 363:4 364:2 366:9 367:21 372:1 375:20 376:11 | needs 42:18 46:11 46:13 47:8 54:11 62:1 64:5 68:20 68:21 70:13 82:12 84:14 96:1 127:2 172:8 176:7 201:21 208:11,12 221:4 233:22 234:15 250:13,13 278:16 290:4 | newtown 272:19 |
| multi 313:14 | national 1:2,4,10 2:12,17,18 3:6 13:3,15 14:5 15:2 15:3 25:12 31:11 31:13 33:15 35:7 35:11 36:2 48:9 48:14 50:13 52:21 59:4 68:12 74:20 78:18,19 81:16 82:21 113:8,12 140:15,18 144:13 145:6 149:21 163:6,7 171:21 181:7 186:2 189:3 191:2,12 192:16 206:14 209:17 211:9 248:5,8 285:11 287:2,4,14 293:11 300:4 310:17 311:7,8,13 314:14 320:16 371:19 372:18 377:18 378:19 382:2 | neat 20:17 24:7 | negative 177:14 178:5 212:20 318:3 322:13 | newsletters 188:20 |
| multiple 132:22,22 200:22 262:4 311:6 | multisyllabic 248:5 | nectarine 229:20 | negatively 229:9 | Nicholas 1:20 |
| multitude 248:4 | multivitamin 312:14,15 | need 20:17 24:7 | neighboring 322:14 | Nick 12:9 14:10 84:3 92:10 100:3 102:2 110:5 114:5 122:21 166:2 188:10 224:14 225:5 236:9 267:17 352:17 365:5 391:7 |
| Murphy 277:7 | Murphy 277:7 | nerve 81:3 | nerve 81:3 | night 17:15 302:4 306:17 309:22 |
| mushroom 287:1 | mushy 250:1 | nervous 138:10 252:8 | nerve 81:3 | nilly 104:21 |
| mutate 223:18 | mutate 223:18 | net 67:5 230:7 | netting 285:15 | nine 74:8 |
| Myths 368:16 | Myths 368:16 | networking 136:22 | Neudorff 71:7,12 72:17 173:5 | Ninety-three 130:13,14 |
| N | | neutral 80:17 255:13 | never 98:16 111:3 170:14 185:22 201:17 220:2 239:10 241:10,14 245:7 260:10 262:17 264:20 293:16 352:20 389:15,17,18 | nitrate 50:15,18 151:1 199:13 |
| naive 262:6 263:6 | naive 262:6 263:6 | netting 285:15 | netting 285:15 | NOC 78:19 80:17 91:22 186:5 287:14 |
| naively 270:21 | naively 270:21 | networking 136:22 | networking 136:22 | non 117:10 123:4 179:14 234:16 313:5 318:19 |
| name 5:19 6:10,20 7:8 9:6,18 10:7,14 11:10 12:9 14:3 15:1,8 27:6 29:8 67:2 71:6 75:8 86:15 90:12 95:4 109:13 116:1 138:17 150:10 153:14 160:22 168:7 205:8 206:4 237:10 244:10 257:2 268:22 277:9 319:13,14 356:2 369:22 377:6 381:17,18 395:21 | name 5:19 6:10,20 7:8 9:6,18 10:7,14 11:10 12:9 14:3 15:1,8 27:6 29:8 67:2 71:6 75:8 86:15 90:12 95:4 109:13 116:1 138:17 150:10 153:14 160:22 168:7 205:8 206:4 237:10 244:10 257:2 268:22 277:9 319:13,14 356:2 369:22 377:6 381:17,18 395:21 | neutral 80:17 255:13 | neutral 80:17 255:13 | non-agricultural 47:5 293:10 |
| Nancy 94:20 | Nancy 94:20 | net 67:5 230:7 | net 67:5 230:7 | |
| nano 36:8,10,15,17 37:10,14 364:13 | nano 36:8,10,15,17 37:10,14 364:13 | netting 285:15 | netting 285:15 | |
| nanotechnology 36:6 37:6,15 | nanotechnology 36:6 37:6,15 | networking 136:22 | networking 136:22 | |
| | | Neudorff 71:7,12 72:17 173:5 | Neudorff 71:7,12 72:17 173:5 | |
| | | neutral 80:17 255:13 | neutral 80:17 255:13 | |
| | | never 98:16 111:3 170:14 185:22 201:17 220:2 239:10 241:10,14 245:7 260:10 262:17 264:20 293:16 352:20 389:15,17,18 | never 98:16 111:3 170:14 185:22 201:17 220:2 239:10 241:10,14 245:7 260:10 262:17 264:20 293:16 352:20 389:15,17,18 | |
| | | net 67:5 230:7 | net 67:5 230:7 | |
| | | netting 285:15 | netting 285:15 | |
| | | networking 136:22 | networking 136:22 | |
| | | Neudorff 71:7,12 72:17 173:5 | Neudorff 71:7,12 72:17 173:5 | |
| | | neutral 80:17 255:13 | neutral 80:17 255:13 | |
| | | never 98:16 111:3 170:14 185:22 201:17 220:2 239:10 241:10,14 245:7 260:10 262:17 264:20 293:16 352:20 389:15,17,18 | never 98:16 111:3 170:14 185:22 201:17 220:2 239:10 241:10,14 245:7 260:10 262:17 264:20 293:16 352:20 389:15,17,18 | |
| | | net 67:5 230:7 | net 67:5 230:7 | |
| | | netting 285:15 | netting 285:15 | |
| | | networking 136:22 | networking 136:22 | |
| | | Neudorff 71:7,12 72:17 173:5 | Neudorff 71:7,12 72:17 173:5 | |
| | | neutral 80:17 255:13 | neutral 80:17 255:13 | |
| | | never 98:16 111:3 170:14 185:22 201:17 220:2 239:10 241:10,14 245:7 260:10 262:17 264:20 293:16 352:20 389:15,17,18 | never 98:16 111:3 170:14 185:22 201:17 220:2 239:10 241:10,14 245:7 260:10 262:17 264:20 293:16 352:20 389:15,17,18 | |

| | | | | |
|--------------------------------------------------|-----------------------------------------------------------|---------------------------------------------------|---------------------------------------------------------------|--------------------------------------------|
| non-antibiotic 119:11 123:10 145:13 | 277:14 278:6,7,16 286:5 287:9 301:4 301:8 307:12,20 | 278:7,10 286:4,21 287:9 288:20 289:6 290:11 | number 6:3,3 31:10 36:20 57:10 75:3 100:17 110:3 | 228:8 251:15 281:3 285:2 |
| non-compliance 179:10 279:7 | 308:9 310:6 312:4 312:10,18,20,22 | 296:14 298:17 301:4 307:20 | 129:20 134:9 146:16 159:9 | occupy 9:7 69:7 |
| non-compliances 64:1,2 279:11 | 313:7 329:22 341:14 356:21 | 310:14,20,21 313:8 314:21 | 222:22 223:2 242:14 248:22 | occur 101:14 254:8 293:4 |
| non-controversial 304:17 | 362:19 364:3 371:5 381:5 | 320:22 322:19 329:21 344:1,3 | 258:11 269:17 271:2 289:16 | occurred 94:5 135:21 302:3 |
| non-food 90:14,15 145:4 | NOP's 95:15 98:11 298:14 | 356:13 358:1 370:14,22 371:7 | 293:12 299:6,7,10 305:10 328:9 | 317:11 360:22 |
| non-GE 240:18 | NOP-accredited 86:17 | 372:1 374:1,14 375:5,8,10,20,22 | 334:1 363:8 373:7 378:5 | occurrence 268:3 |
| non-genetically-... 343:17 | normal 101:13,13 | 376:10 377:19 378:3,15 379:17 | numbers 67:8 83:16 99:8 100:7 | occurring 162:2 179:10 |
| non-GMO 75:22 161:19,22 162:17 | North 255:15 361:11 | 381:6 | 100:14 129:20 264:10 | 50:18 87:1 129:16 146:1 |
| 162:20 163:3 165:20 179:13 | Northeast 108:6 | NOSBs 198:4 | numerous 313:8 347:10 | odd 19:18 |
| 352:4 365:21 384:8 | Northern 161:2 | NOSB's 331:9 375:15 | Nunez 160:9 205:10 | offer 216:1 374:13 |
| non-organic 318:19 | Northwest 108:5 127:22 130:4 | nose 278:4 279:22 | nutrients 151:5 | offering 309:22 385:15 |
| non-passage 35:6 | 131:10,21 250:5 | note 17:3 147:1 301:7 340:5 | nutrition 139:16 235:4 | offers 147:10 |
| non-production 168:16 | NOSB 1:5 4:5 26:5 36:7,9,9 37:10 | 379:11 | Nutritionals 150:12,15,19 | Office 374:10 |
| non-profit 86:17 358:20 359:1 | 38:2 39:18 40:17 41:9 42:13 43:17 | noted 53:7 58:20 152:2 | 152:15 | officer 95:5 150:12 |
| non-profits 359:4 | 44:15 47:2,3,7,8 47:13,19 51:14 | notes 94:16 | | offices 15:21 50:4 |
| non-synthetic 293:9 | 52:9 55:20 64:11 68:22 69:5,9 70:2 | notice 48:12 73:13 274:12 276:7 | <hr/> O <hr/> | official 49:11 304:7 345:21 |
| non-use 391:14 | 70:13,15 71:8 72:13 75:5 76:8 | noticed 86:1 | objected 334:19 | OFPA 68:1 69:1 74:22 75:14 82:22 |
| NOP 1:2 34:18 35:2 36:16 40:18 | 80:5 82:12,19 83:9 84:9 87:11 | notification 59:8 61:19 62:18,19 | objective 358:6 366:10 | 140:19 171:4 172:3,4 173:20,20 |
| 40:18 45:7 47:22 49:12,20 59:1 | 90:4 92:6 95:10 95:14,18 97:10 | notifications 59:19 61:21 | objectively 358:5 358:14 | 179:2 240:16 248:20 285:9,22 |
| 68:20,21 70:2 77:17,22 82:16 | 106:18 107:6,15 108:17 109:1 | notified 63:1 205:13 | objectivity 39:13 357:10,19 | 286:18 287:5 298:16 299:7 |
| 87:11 89:19,20 90:3 95:7,10 | 113:10 119:4,20 120:3 132:15 | notify 62:6,9,11 221:13 | obligation 332:5 380:2 | 303:6 326:17 371:1 373:21 |
| 106:19 151:17 152:17 156:16 | 139:14 140:1,5 144:12 147:11 | noting 221:13 328:15 | obnoxious 21:12 | 374:3,22 378:14 378:17 379:11,14 |
| 163:11 178:20 180:8 186:21 | 149:14 151:10,14 151:16 152:2 | notion 252:3 360:12 | observation 110:16 | 379:16 |
| 187:15 189:7,15 201:6 203:1 231:6 | 179:6 197:21 201:21 203:1 | novel 107:15 | observations 111:13 | OFPA's 378:9 |
| 231:8 232:22 234:11,15 259:11 | 238:21 239:16 241:12,17 259:1 | November 37:8 47:11 | observe 278:13 | oh 17:10 30:9 93:10 144:20 202:9 |
| | | no-shows 396:1 | obtain 63:6 378:16 | 242:12 291:18 348:12 385:11 |
| | | NRCS 174:19 233:9,13,15,17 | obviously 81:2 102:9 115:19 | 390:11 |
| | | NSF-305 317:19 | 155:9 182:10 | OIG 45:7 |
| | | | | oil 10:21 317:21 |
| | | | | okay 5:17 24:15,19 |

| | | | | |
|--------------------------|---------------------------|---------------------------|----------------------------|-------------------|
| 25:21 28:13,14 | ongoing 97:14 | 159:8 165:9 | 262:8 268:2,15 | 35:7,11,13,18 |
| 29:9 31:6,7 50:9 | 329:14 | 176:18 210:16 | 270:12 274:15 | 36:2,11,15 37:7 |
| 51:10 54:18 63:2 | online 142:6 207:4 | 222:15 327:7 | 275:4,10,11 | 42:4,6,7,9,11,13 |
| 65:11 66:16 73:18 | 211:9,10 244:9,9 | 375:11 | orchardist 175:11 | 42:14 43:10,15 |
| 73:19 85:11 86:14 | onsite 278:3 | opinions 152:3 | 268:11 269:9 | 44:5,7,11 45:10 |
| 94:14,21 105:9 | Ontario 108:7 | opportunities | 270:3 | 45:15 46:1,2,5,15 |
| 109:6 122:16 | on-deck 66:20 | 32:19 | orchardists 117:4 | 47:21 48:6 49:15 |
| 129:9 138:12 | on-farm 88:7 | opportunity 4:12 | 247:4 258:16,19 | 49:17,19,21 50:5 |
| 149:9 153:13,14 | on-the 279:21 | 4:13 18:21 19:5 | 259:13 260:13 | 50:7 51:13,16 |
| 156:3,14 160:6,11 | on-the-ground | 22:3 32:22 119:10 | 265:14 276:19 | 52:4,11,17,22 |
| 160:13,20,21 | 278:3 | 123:15 128:13 | 339:12,13 | 53:18 54:11,18,19 |
| 168:4,5 172:20 | open 3:8 18:11 | 138:16 144:1 | orchards 31:20,22 | 56:11,15,16,20 |
| 205:12,16,19,20 | 43:13 230:7 241:1 | 147:11 150:8 | 32:2 97:21 110:18 | 57:3,3,8,11,13 |
| 205:20 230:5 | 260:12 261:3 | 160:22 231:4 | 119:12,13 122:14 | 59:4,7,12,18,19 |
| 235:14 236:22 | 270:16 334:11 | 253:14 283:3 | 123:16,18 154:17 | 60:1 61:18,18,20 |
| 237:6 243:20 | 336:13 376:4 | 320:8 324:11 | 155:5 193:3 246:5 | 61:21,22 63:4 |
| 277:7 283:7,8 | 395:2 | 328:22 337:15 | 246:6,21 250:3 | 64:14,17,20,22 |
| 284:9,18 285:8 | opening 333:11 | 361:10 387:16 | 257:21 258:22 | 67:5,9,10,22 |
| 296:1 302:2 304:1 | 334:20 | 396:3,4 | 261:19 263:12 | 71:18 72:18 73:2 |
| 308:2 309:18,19 | openness 40:20 | oppose 141:15 | 268:18 275:22,22 | 73:5 77:9 78:8,18 |
| 312:14 315:14,18 | opens 279:14 | 237:12 241:17 | orchestrated 258:2 | 78:20 79:5,7,11 |
| 316:20 319:11 | operate 101:6 | 375:17 | order 3:2 4:6 19:18 | 80:10,11,11,15,22 |
| 320:6,9,12 324:8 | operated 201:18 | opposed 24:15 90:3 | 88:7 90:5 152:20 | 81:2,8,9,14 82:6 |
| 360:15 365:18 | operating 147:8 | 102:5,15 103:19 | 172:6 233:2 | 82:12,20 84:21 |
| 376:19,19 385:12 | operation 60:14 | opposing 299:17 | 242:16 284:2 | 85:2,3 86:17 87:3 |
| 391:21 394:19 | 61:12 62:22 70:6 | opposite 96:15 | 293:4 297:22 | 88:2,10,16,19 |
| 395:9,21 | 70:8 266:4 278:13 | option 96:21 | 367:22 | 89:5,21 90:16 |
| old 264:10 274:19 | 281:20 | 101:21 102:1 | Oregon 1:12 28:2 | 91:20 92:12 93:20 |
| OMRI 44:9 304:15 | operationalize | 111:3 115:4,5 | 244:2 253:9 257:6 | 94:1,4 96:4,17 |
| 305:3 306:1,2,5 | 200:1 | 140:16 390:13 | 259:10 269:3,12 | 98:6,12 103:15,22 |
| 306:17 310:9 | operations 23:19 | 392:14 | 306:18 310:3 | 104:1 105:21 |
| OMRI's 304:20 | 23:20 34:4 46:3,5 | options 257:19 | 313:12 314:19 | 106:3,7,11,15,16 |
| once 46:3 62:3 | 46:15 52:1 54:21 | 325:12 330:22 | 377:9 | 107:1,17 108:4,20 |
| 85:15 109:1 113:7 | 55:1 60:8,20 74:6 | 334:17 389:19 | OREI 126:9,16 | 110:10,13 112:11 |
| 166:16 199:11 | 86:19 95:7 96:6 | oral 133:14 148:2 | organic 1:2,4,10 | 113:17 114:4,12 |
| 219:12 224:6 | 98:13,14 99:22 | 253:22 330:16 | 2:13,17,19 3:6 7:1 | 114:14 115:6,8 |
| 225:19 226:3,8 | 100:17 104:20 | 331:16 | 7:10,16 8:12,13 | 116:2,3,10,15 |
| 234:11 290:14 | 110:20 111:8,9,9 | Orange 272:19 | 8:21 9:4,13 10:1 | 117:1,3 118:1,2,7 |
| 309:14 379:4 | 196:6 231:12 | orchard 11:11 | 10:10 11:6,7,16 | 119:4,12 124:15 |
| onerous 96:9 | operator 62:1 | 17:14 32:9 93:21 | 11:18 12:11,21 | 124:17 125:3 |
| 112:18 | 280:6 347:4 | 94:6 104:2 146:3 | 13:15,21,21 14:5 | 129:8 130:7,10,15 |
| ones 32:4,5 58:17 | operators 52:19 | 154:15 155:1 | 15:2 21:9 28:2,2,2 | 134:9,13 135:8 |
| 59:2,3 104:4 | 53:5 55:9 64:22 | 158:14 175:14 | 28:4 30:12,15 | 139:6 140:13,15 |
| 111:1 221:19 | 78:8 88:21 92:13 | 177:9 221:14 | 31:11,13,16,18 | 140:17,18 141:4,9 |
| 259:1 261:14 | 127:10 144:22 | 224:12 225:17,19 | 32:2,4,10,15,20 | 142:12 144:13 |
| 266:19 312:6 | 234:8 348:4 | 236:12 244:18 | 33:1,5,7,7,10,15 | 145:12 146:6,7,10 |
| 314:19 | opinion 72:11 | 259:8,9 260:2,11 | 33:16 34:2,8,12 | 146:11,15 147:5,8 |

| | | | | |
|-------------------|-------------------|----------------------------|----------------------------|----------------------------|
| 147:14 148:1,9,13 | 244:17,17 245:9 | 370:9,11,13,16 | 124:6 128:22 | 77:1 116:6 145:17 |
| 150:9,19 151:5,6 | 245:15,15 247:18 | 371:22 372:11,18 | 166:15 227:8 | 146:21 193:15 |
| 151:7,19,21 152:6 | 247:21 249:12 | 373:11 374:12 | 254:22 295:11 | 208:15 212:17 |
| 152:8,9,11,13 | 250:19,19 252:2 | 375:1,12 377:7,16 | 300:7,14 306:18 | 213:2 252:4,9 |
| 154:17,17 155:4 | 252:13,15,16,17 | 377:17 378:4 | 310:9 350:8 | |
| 157:20 158:3 | 252:18,21 253:7 | 379:19 380:10,15 | 382:16 | P |
| 159:12 161:1,4,8 | 255:14 257:5,10 | 380:17,20 382:3 | OTA's 345:21 | pace 364:6 |
| 161:11,13,21 | 257:13,17 258:9 | 382:19,21 383:12 | outbreak 115:1 | Pacific 108:5 250:4 |
| 162:1,2,3,5,8,10 | 258:16,19 259:8 | 383:13,20 384:5 | outcome 334:21 | pacing 115:16 |
| 162:14,21,22 | 259:10 261:4 | 384:11,18 385:7 | 351:1 358:7 | pack 270:17 271:1 |
| 163:1,7,7,22 | 268:15 270:21 | 385:16 387:5 | outdoors 70:10 | packing 270:21 |
| 165:4 166:10,20 | 275:12 276:11,18 | 390:14 391:14,18 | outliers 273:17 | page 49:12 107:2 |
| 166:22 167:13 | 277:10,11,13 | 392:14 394:9 | outlined 256:11 | 212:15 279:19 |
| 168:11,15,16,20 | 278:1,2,6,11,12 | organically 9:3 | outlines 38:15 | 333:10 |
| 169:2,9,11,13 | 280:1 287:15 | 264:2 271:1 | 42:17 46:16 | pages 177:19 |
| 170:9,10 171:8,14 | 297:21 300:5 | 276:13 | outlining 71:9 | 281:21 |
| 171:17,20,20 | 304:16 306:11,20 | organically-grown | outraged 372:13 | paid 295:5 |
| 172:10,11,13,15 | 310:7 311:21 | 306:18 | outreach 50:3 | palling 29:14 |
| 172:16 173:7,8 | 312:2,11,12,13,14 | organically-prod... | 126:8 127:14 | Pam 381:13,14,14 |
| 174:6,11,17 175:4 | 312:17 313:14,20 | 33:17 | 131:21 143:6 | 381:18 |
| 175:7,12 176:5,6 | 314:3 317:1,16,16 | organics 32:17 | outs 69:9 | Pamela 209:11 |
| 176:7,22 177:16 | 318:11,17,20 | 48:14 49:22 67:18 | outside 107:4 | panel 7:15 125:13 |
| 178:17,19 179:11 | 319:1 320:16,18 | 69:9 77:6 275:6 | 108:11 109:10 | panels 374:13 |
| 179:21 181:10,14 | 321:8,12,13,15,22 | 321:3,20 332:13 | 111:2 137:20 | paper 106:12 |
| 181:16,16 184:6,7 | 322:5,6,8,11,17 | 382:18 | 347:6 353:18 | 279:10 280:9 |
| 184:8,9,13 186:2 | 322:18,22 323:3,7 | organism 361:22 | overall 63:2 135:7 | 333:20 368:18 |
| 188:1,18,22 189:3 | 323:9,11 325:17 | 367:5,6,10 | overarching 21:8 | papers 29:8 213:18 |
| 190:4,7,14,14 | 326:9 327:1,5,14 | organisms 224:11 | overcome 60:22 | paperwork 52:12 |
| 191:20 192:5,5,10 | 327:19 330:1,5 | 224:12 239:21 | 99:14 | 55:20 56:1 58:8 |
| 192:16 195:20 | 332:2,6 333:2,15 | 320:17 321:14,20 | overly 52:18 58:7 | 63:5 95:13 96:6 |
| 196:5,17,21 197:5 | 337:19 341:18 | 322:4 323:5,8 | 64:22 392:2 | 99:17 163:13 |
| 197:8,18 198:22 | 342:1,1 343:4 | 388:7 | overrun 387:9 | 196:5 277:18 |
| 200:7 206:15,17 | 344:11 346:1,5,9 | organization 140:3 | overseas 33:19 | 280:7,22 281:6,14 |
| 208:2,21 209:7,20 | 346:15 347:7,13 | 153:17 210:5,18 | oversee 34:10 35:2 | paperwork-inten... |
| 215:19 216:11 | 347:15 349:5 | 216:3 237:17 | oversees 278:6 | 54:9 |
| 218:10 219:17 | 351:2,3,6,16 | 305:5 | oversight 23:9 53:2 | paragraphs 144:17 |
| 220:12,15 227:14 | 352:3,7,13,16 | organizations | 68:10 70:16 82:15 | parameters 75:11 |
| 228:18 229:11,19 | 353:9,18 354:5,7 | 78:20 90:10 258:3 | 82:17 | paranoid 333:8 |
| 229:20 230:11 | 354:8 355:6 356:7 | organized 75:11 | overtaken 185:14 | parents 341:21 |
| 231:12,17 233:2 | 357:12,12,20 | organizing 387:13 | overuse 264:15 | Parham 94:20 |
| 233:13,19,21 | 358:16 359:10,19 | origin 51:2 | overview 37:17 | parse 198:12 |
| 234:3 235:9 | 359:22 361:9,13 | original 121:8 | 40:6 44:6,19 | part 9:10 10:6 |
| 237:10,19 238:1 | 361:14 362:6,9,11 | 173:22 200:14 | overwhelmed | 32:17 45:20 47:16 |
| 238:10,16 239:1,2 | 362:17 363:2,15 | 201:16 311:2 | 52:11 83:9,12 | 49:4 52:2 62:12 |
| 239:4 240:13 | 363:22 364:15,18 | OSP 111:20 279:9 | overwhelming | 67:17 68:19 85:3 |
| 241:6,6,8,11 | 364:22 365:8 | 280:4,17 | 207:17 | 90:16 111:11,19 |
| 242:9 244:12,15 | 369:10,17 370:2,6 | OTA 116:9 118:9 | oxytetracycline | 128:8,22 135:5 |

| | | | | |
|---------------------------|---------------------------|---------------------------|----------------------------|--------------------------|
| 137:1 146:19 | pasture 278:17 | 225:8 257:8,14 | 386:12,16 387:13 | 185:2 186:15 |
| 154:8 159:19 | Pat 138:8,9 143:18 | 258:9 259:12 | 388:1,19 389:12 | 200:12 337:2 |
| 180:17 187:4 | 144:2 147:18,19 | 260:18 271:17,20 | 389:20 390:2 | 341:1 |
| 189:21 191:6,8,9 | 147:21 149:11 | 272:3,4,9 274:13 | 391:5 392:9 | permanent 200:17 |
| 194:13 198:11 | 150:5 | 275:20 392:22 | people's 18:16 | permitted 43:1 |
| 201:15 206:10 | patent 380:8 | pedal 29:1 | 348:1 355:17 | 112:13 114:3,12 |
| 208:10 214:17 | Path 361:9,11 | pedigree 67:12 | perceived 135:12 | 241:11 |
| 228:5 229:10 | 364:1,20 | Peggy 304:11,11,15 | 138:22 177:14 | Perry 85:14 |
| 231:16 244:18 | pathogen 156:19 | 307:3 309:20 | 229:10 326:8 | persisted 201:9 |
| 268:12 269:8 | 252:7 | penalties 58:5 | perceives 354:18 | person 20:2 35:2 |
| 276:6,15,17,19 | pathogens 156:22 | penalty 57:21 58:1 | percent 11:14 | 244:15 275:2 |
| 277:7 303:19 | 158:18 232:9 | 58:2,11,12,13 | 34:20 130:6,8,13 | 276:8 281:14 |
| 325:20 328:17 | 238:7 | 59:22 234:13 | 130:14 151:1 | 288:17 333:9 |
| 337:11 377:9 | pattern 223:22 | pending 296:18 | 161:14 162:4,6,7 | 385:14 |
| 391:1 | patterns 105:3 | penetration 272:1 | 166:21,22 167:2 | personal 110:15 |
| partially 42:12 | Paul 160:10 205:11 | Penn 93:5 | 207:9,13,14,14,15 | 169:15,19 248:13 |
| participated | pay 233:14 272:12 | Pennsylvania | 207:16 208:2,3,4 | 313:1 331:4 397:1 |
| 233:16 | paying 167:6 | 86:16 92:12,13 | 219:19 240:19 | personally 8:11 |
| participating 37:1 | 189:18 219:7 | people 4:22 15:15 | 257:7 259:22 | 258:11 293:17 |
| 329:3 | PCC 138:6,18 | 16:2 19:19 24:1 | 262:8 275:20 | 322:12 331:15 |
| participation 79:2 | PCO 86:17 88:17 | 26:20 29:20 35:15 | 313:14 317:17 | 359:20 360:8 |
| 241:20 379:19 | 89:13 91:5 92:11 | 57:1 66:3,4 78:13 | 318:11,12,20 | 372:9 |
| 380:15 396:20 | PCO's 86:20 | 86:9 94:18 115:5 | 340:9 341:21 | personnel 233:15 |
| particular 14:9 | PCR 362:20 | 132:3 137:10 | 345:14 349:16 | perspective 99:19 |
| 38:4 44:14 46:19 | peach 229:20 | 139:3 143:8 | 363:1,5 365:8,15 | 135:4 170:13 |
| 48:3 50:20 51:20 | peaches 229:16 | 153:17 159:11,13 | 365:19 384:10 | 203:7 215:4,12 |
| 112:20 113:4 | pear 87:4,4 88:3 | 167:5 172:11 | 394:4 | 216:2 225:1 244:7 |
| 275:10 368:8 | 91:7 92:16,21 | 178:22 179:14 | percentage 96:2,7 | 276:11 296:9 |
| particularly 15:5 | 93:12 100:7,15,15 | 181:13 192:19 | 131:4 313:20 | 326:13 342:17 |
| 95:10 97:3 104:2 | 110:8 119:4 | 195:14 196:20 | 317:1 342:2 | 347:20 387:10 |
| 107:21 131:9,16 | 130:21 131:16,16 | 205:12 215:9 | 363:11 367:18,20 | 388:17 389:13 |
| 132:7 240:14,19 | 141:13 145:15 | 216:8 219:6 220:8 | 386:18 | pertaining 146:13 |
| 268:5 275:5 | 207:8 234:19 | 223:11 238:17 | percentages 77:20 | pertinent 152:17 |
| 288:20 | 238:1 239:1 | 244:21 247:20,21 | 310:7 313:12 | pest 64:16 173:4 |
| partisan 38:20 | 251:12,17 262:8 | 263:13 264:13,14 | perception 133:11 | 180:12 181:5 |
| partners 234:10 | 262:22 268:6 | 266:8 268:19 | 135:8,11 140:6 | 190:3,13,17,18 |
| partnerships 51:18 | 274:14 275:1 | 271:15 275:7 | 154:21 251:3 | 191:18 286:16 |
| parts 43:19 52:17 | 306:20 359:10 | 277:20 289:8,13 | perennial 78:4 | pesticidal 212:19 |
| 55:7 67:6 74:22 | 372:11 | 290:9 291:8,14 | 231:19 | pesticide 44:17 |
| 109:18 255:6 | pears 11:12 81:22 | 292:1 294:21,22 | perfect 17:17 95:22 | 45:1 62:8 71:18 |
| 260:2 290:2 | 108:8 111:10 | 304:2 326:22 | 223:14 | 171:2,8 240:10 |
| pass 41:3 223:19 | 130:11,19 131:4 | 327:17 328:2,3,13 | perform 374:20 | 278:20 367:7 |
| 336:10 | 131:14 132:8,10 | 330:17,19 336:14 | performance 59:20 | pesticides 7:22 |
| passed 287:8 | 154:18 155:4 | 337:11 345:3 | 187:17 | 32:11 81:10 118:7 |
| passes 40:21 | 206:11 213:3 | 347:12,14 349:4 | performed 153:21 | 134:11 168:9 |
| passionate 15:17 | 215:20 218:3,11 | 352:2 360:6 | period 4:21 66:17 | 173:15 175:1 |
| 19:9 261:4 | 218:12 219:18 | 382:11,18 385:8 | 141:9 144:22 | 177:18 240:5 |

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 250:20 252:1 287:22 300:4 323:6 383:10 pests 73:3 pet 51:2 petition 48:9,11,13 48:20 49:2,5,5 68:8 72:15,20 73:12,17 84:18 85:6 108:2 118:18 121:18 145:11 186:1 238:17 241:1,4 242:3,12 243:4,6,7 289:12 290:1 293:17,22 294:4,6 296:17 297:5,7,9,11 298:14 299:10 300:21 301:6 302:14 373:16 376:1 381:1 petitioned 291:9 292:6,11,14 298:15 300:19 314:22 370:11 371:9,18 378:17 petitioner 240:22 288:20 293:20 294:2 297:6,10 359:6 373:18 381:5 petitioners 288:22 289:5 290:10 291:12 293:15 379:6 petitioning 71:14 petitions 74:20 75:2 113:16 284:11 287:8 288:15 289:15 290:3 291:10 293:13 305:21 Pew 374:10 pharmacological... 223:12 phase 88:19 225:3 258:15 | phased 116:10 234:20 phase-in 328:3 phase-out 89:10 146:14 224:21 226:12 227:1 Phasing 147:10 phenomenon 255:1 pheromone 267:3 phone 143:5 phones 5:7,8 247:18 phrase-by-phrase 334:1 physical 147:2 188:4 189:6 190:20 287:16 288:1 371:11 physician 217:6 physicians 216:21 pick 31:21 153:11 272:8 276:4,15 309:16 390:15 picking 271:22 pickup 281:16 picture 327:1 pie 387:10 piece 184:7 191:8 326:8 343:19 387:9 389:22 pieces 84:11 327:1 pigs 267:2,5 pinged 223:16 Pink 193:9 pins 230:7 pioneer 267:21 Piotr 85:16,16 pipe 302:9 Pippin 272:19,20 pitched 81:5 pithy 250:1 place 70:17 106:15 120:16 129:3,15 164:6 172:1,14 225:20 238:16 250:8 281:15 294:5 335:9 346:3 | 348:7 353:6 places 256:3 327:16 plain 55:11 107:7 plan 16:10 22:17 22:20 40:22 41:1 59:19 61:19,20,22 62:4 72:12 94:3 147:5,7 148:1,10 148:11,19 152:20 188:1 190:14 192:6,10 194:11 290:6 planet 247:21 planned 71:11 283:19 planning 284:3 292:12 plans 57:2,3 59:7 59:18 61:18 89:6 146:15 148:3,14 255:15 plant 10:18 235:3 263:2 286:14 288:9 367:2,12 planted 268:17 270:14 271:21 274:16 348:16 349:9 planting 42:11 187:5 194:1 260:21 322:10 351:19 362:15 plantings 187:3 plants 288:7 367:12 371:4 plastic 175:14 302:10,14 play 158:8 245:21 352:19 playing 33:20 230:2 353:9 plays 266:3 please 5:6 15:11 27:8 68:21 72:22 87:8 95:19 205:5 210:16 252:21 | 279:20 313:15 320:15 321:18 322:2 323:13 342:9 372:14 381:17 385:13,20 pleased 209:10 231:6 277:18 pleasure 7:6 17:10 17:14 70:1 pledge 227:10 plot 93:5,8 plowed 384:18 plug 119:1 134:7 pockets 184:10 podium 5:3 18:13 20:22 115:20 124:7 282:17 283:4 poet 17:9 point 16:20,22 32:1 52:7 70:4 80:22 84:16 116:20,21 137:10 139:8 148:16 185:4 189:9 211:21 216:17 220:1 222:6 224:3 263:17 268:19 290:20 294:19 302:21 308:13,21 329:8,9,20 330:7 330:8 331:11 343:8 364:15 369:16 393:16,17 points 70:12 87:9 164:20 192:7 328:9 342:2 poisoning 168:13 polarized 81:4 police 374:5 policies 37:5 42:2 48:20 78:22 95:11 98:17 320:19 policy 5:8 6:6 7:11 7:20 8:18 9:12 10:3,16 12:5,15 23:8 37:3 43:4,8 | 48:14 82:19 120:2 120:16 137:11 172:1 227:12 237:10 239:17 290:2 295:11 296:2,3,10,11,12 300:22 307:10,13 338:4 345:21 356:15 373:9 political 38:20 98:2 118:15 poll 207:3 211:3,8 219:9 pollen 367:11 pollenation 232:6 pollinators 232:2,4 240:11 polling 211:12 polls 211:10,13 244:9 pollution 168:17 polyoxin-d 242:3 243:13 pome 100:16 105:4 ponds 270:14 pony 93:1 pools 270:12 population 133:3 133:12 210:21 386:12 Portland 1:11,12 25:22 28:2 30:2 31:7 Portlandia 26:2,3 pose 100:5 poses 321:2 position 13:7 15:12 21:20 22:15 69:3 69:7 76:22 87:22 96:18 112:20 141:14 169:18 186:4 208:14 211:6 227:11 237:20 242:22 243:13 258:20 289:4 351:13 positioning 396:5 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|---------------------------------------------|-------------------------------|-----------------------------------|-----------------------------------|-------------------------------------------|
| positions 9:21 81:4 133:13 388:11 | 227:15 228:1 286:21 348:10 | 308:4 | prevented 255:2 | probable 87:7 |
| positive 332:14 | practices 6:17 | presence 45:9,16 232:16 | preventing 323:7 353:14 | probably 8:22 94:4 101:20 102:1 |
| possibilities 325:8 | 48:22 49:1 51:7 | present 1:14 2:10 | prevention 166:9 | 143:11 171:7 |
| possibility 368:5,7 | 57:4 87:11 88:22 | 150:16 182:13 | 166:13 322:18 | 178:22 201:11 |
| possible 76:6 | 96:13 99:6 117:3 | 212:18 370:5 | 348:19 354:20 | 247:20 260:9 |
| 115:12 127:10 | 123:10,11 125:10 | presentation 19:21 | preventive 148:8 | 262:16 265:2 |
| 152:4 154:10 | 146:17 147:3 | 20:2,13 31:4 | 149:2 158:2 | 290:4 293:22 |
| 179:12 186:4 | 162:21 167:16 | 73:10 189:21 | previous 24:8 90:4 | 295:19 309:12 |
| 188:16 213:10 | 180:15 187:16 | 301:20 | 96:10 326:4 | 336:5 353:21 |
| 229:1,2 254:18 | 190:1 207:12 | presentations | Previsto 97:5 | 360:12 363:4 |
| 255:21 278:15 | 233:7,9 273:14,16 | 336:2 | 338:22 | 365:14 |
| 290:16 291:3 | 273:19 297:21 | presented 26:8 | pre-dated 259:11 | problem 46:18 |
| 297:11 330:4 | 338:13 341:10 | 77:22 88:18 | pre-meeting 70:12 | 81:20 98:19 |
| 334:2 363:19,21 | practicing 236:13 | 129:22 169:17 | pre-NOSB 196:10 | 155:12 157:15 |
| 373:15 376:8 | praise 13:22 | 344:9 | prices 162:11 | 159:17 162:13 |
| possibly 91:15 | pray 263:8 | presenter 195:7 | prides 174:11 | 180:14 182:11 |
| 155:11 305:17 | Prayer 17:8 | preservatives | primarily 74:6 | 183:5,16 209:6 |
| 365:2 | preamble 231:17 | 311:15 | 100:17 154:8 | 210:8 213:17 |
| post 22:17 46:2 | 232:19 312:4 | preserve 54:17 | 338:8,16 | 220:10,16 225:9 |
| 139:15 | precarious 258:20 | 68:18 | primary 46:13 | 226:5,11 265:16 |
| postpone 170:17 | precautionary | preserved 78:22 | 111:18 141:12 | 307:16,19 |
| posts 258:12 | 107:14 158:2 | 166:20 240:18 | 183:18 212:4 | problematic 181:8 |
| potential 23:1 91:6 | 235:13 | 343:5 | 339:11 357:11 | 181:17,21 193:7 |
| 178:8 213:5 | precedent 187:15 | Preserving 322:10 | principle 63:19 | 193:11 |
| 218:16 222:15 | precedents 113:9 | president 150:11 | 85:5 107:13 | problems 8:4 81:7 |
| 252:8 256:10 | Precisely 377:5 | 153:15 337:20 | 118:13 | 158:6 168:12 |
| 297:12 302:6 | preclude 308:7 | presiding 1:12 | principles 56:7,9 | 174:4 180:21 |
| potentially 112:19 | precocious 272:6 | press 211:4 | 56:12 57:15 64:14 | 217:15 275:13 |
| 218:8 246:1 251:7 | predation 232:8 | pressing 209:14,22 | 64:17 84:22 91:20 | procedure 39:17 |
| 376:3 | predators 232:10 | pressure 114:20 | 95:16 106:11 | 120:2,16 288:18 |
| poultry 69:17 70:8 | 232:13 | 199:16 259:2 | 235:13 249:13 | 298:22 |
| 140:7 | predicated 200:14 | 332:10 354:17 | print 142:7 | procedures 38:13 |
| powerful 173:11 | prefer 113:3 | Presumably 176:4 | prior 226:14 | 48:10,15,21 164:1 |
| PowerPoint 284:20 | 249:20 | Pretending 68:9 | 279:15 317:12 | 296:12 300:22 |
| powers 332:11 | preferred 136:1 | pretty 35:3 142:7 | 331:7 358:2 | 307:10 375:3 |
| PPM 213:2 298:21 | preliminary 210:19 | 218:19 219:21 | priorities 69:12,14 | process 10:6 12:22 |
| 301:16 307:17 | 210:22 330:16 | 223:6 236:12 | 76:9 331:10 344:1 | 19:12 22:2 33:5 |
| PR 393:8 | prematurely 119:1 | 286:19 351:21 | prioritize 146:5 | 34:17 41:12 48:11 |
| practical 57:2 | prepare 282:12 | prevail 382:6 | 313:9 | 48:13,20 49:2,5 |
| 76:16 78:7 203:2 | prepared 129:20 | prevalent 299:8 | priority 313:11 | 52:15 53:7 54:4,8 |
| 363:18 | 377:11 | prevent 145:1 | 361:14 | 54:14,16 55:16 |
| practice 51:1 79:21 | prerequisite | 158:5 170:9 343:9 | private 38:18 | 56:1,5,11 57:19 |
| 113:5 123:6 | 380:15 | 361:15 362:8 | 128:11 322:13 | 66:15 68:19 72:8 |
| 188:14 203:5,13 | prescribe 362:7,20 | 374:1 | 353:5,20 | 73:1 79:22 88:9 |
| 207:7,19 213:14 | prescribed 241:9 | preventative 119:7 | prize 121:1 342:12 | 88:13 97:7,10,22 |
| 219:3,11 220:3 | prescriptive 300:11 | 146:4 276:20 | probability 212:17 | 98:2 99:17,18 |

| | | | | |
|---------------------------|---------------------------|---------------------------|-------------------------|----------------------------|
| 106:5 108:19 | 150:19 152:13 | 94:1 96:18 101:6 | 33:14,18 34:7 | 243:8 266:12 |
| 113:5 124:13 | 161:3 232:15 | 103:10,14,15 | 36:15,18 45:16 | 276:6,7,17,20 |
| 137:2 145:20 | 235:1 254:17 | 106:3,16 108:14 | 48:6 51:14 57:13 | 278:6 319:15 |
| 147:6 158:1 | 321:10 | 110:14 115:8 | 72:5 79:10 81:8 | 322:19 347:13 |
| 163:15 174:12,14 | produced 265:10 | 116:11 118:1 | 109:11 112:2,10 | 361:9 |
| 179:7 184:18 | 312:1 | 130:7,22 134:10 | 112:12,13 145:1 | programmatic |
| 189:22 190:8 | producer 8:21 11:2 | 134:13,17 145:15 | 146:11 152:12 | 148:5,12 |
| 192:7 198:7 | 11:7 12:10 62:1 | 146:10 150:10,21 | 161:4,17 162:16 | programs 12:3 |
| 201:11,12 210:15 | 114:12 188:8 | 150:22 151:6,7,9 | 164:21 171:2,8 | 49:18,19 148:6 |
| 234:10 248:18,18 | 325:17 354:7 | 151:12,19,21,22 | 182:18 183:20 | 264:3 |
| 249:7 278:5 | 361:13 393:2 | 152:7 154:17 | 190:22,22 191:12 | progress 36:3 51:6 |
| 289:12,21 291:20 | producers 45:12 | 155:2 157:13 | 203:16 218:17 | 117:8 119:2 |
| 293:1 298:13 | 49:17 60:11 64:19 | 158:4 167:11 | 220:15,21 229:8,9 | 121:12,22 124:9 |
| 299:20 300:22 | 67:10 77:5 87:4,5 | 168:12,15,20 | 233:21 246:9 | progression 125:2 |
| 301:3,15 307:15 | 87:12,16 88:6,15 | 169:9 171:8,14 | 254:11,13 255:17 | progressive 58:6 |
| 308:22 309:1 | 89:9 91:12 110:8 | 172:15 174:17 | 256:16 263:10 | prohibit 81:10 |
| 310:10 316:14 | 110:12 111:4 | 179:11 181:11,12 | 306:4 311:20 | 237:19 362:6 |
| 317:12 324:20 | 113:12 133:5 | 181:16 184:13 | 312:3,11,18 313:1 | prohibited 36:11 |
| 326:9 327:20 | 147:1 150:16 | 185:16 190:4 | 313:15 314:3 | 43:8 44:8 62:10 |
| 339:9 350:22 | 169:11 191:4 | 196:17 197:15 | 318:16 339:16 | 107:9 292:2 |
| 356:14 359:13 | 195:4 197:8 220:6 | 207:13 208:22 | 346:5,8 347:22 | prohibitions 89:16 |
| 372:4 375:13 | 241:3 303:1 | 216:17 226:2,3 | 348:1 363:3 380:6 | prohibitive 391:4 |
| 387:2,2,17 | 324:17 327:2 | 228:19 229:11 | 383:22 384:8,12 | prohibits 60:16 |
| processed 33:17 | 387:20 | 231:17,18 234:19 | 391:14 394:8 | 239:21 |
| 48:6 171:17 240:7 | produces 265:9 | 235:10 238:1 | professional | project 46:19 126:9 |
| processed-based | producing 108:7 | 240:1,12 241:2 | 157:11 318:8 | 126:10,16 161:19 |
| 345:7 | product 75:8 80:1 | 256:6 260:8 | professionals | 171:10 233:1 |
| processes 56:13,14 | 90:17 125:7 | 262:22 268:6 | 217:19 375:11 | 335:1 365:21 |
| 56:16,17 98:9,17 | 167:18,20 171:19 | 272:5 284:13,14 | Profit 259:14 | 384:8 |
| 161:17 163:12 | 174:12 203:17 | 285:14,21 286:1 | program 1:2 2:13 | projects 88:4 |
| 239:22 241:13 | 206:18 220:1 | 286:12 287:1,2,7 | 2:17,19 3:6 7:2 | promising 246:10 |
| 292:18 299:8,9 | 222:12 225:3 | 287:10 288:1,2,6 | 10:17 13:4,12,15 | promote 124:7 |
| 378:12 | 230:3 254:4 | 297:21 302:5 | 14:5 15:3 21:9,22 | promoted 168:15 |
| processing 12:12 | 255:22 256:14 | 305:22 306:4,5,8 | 23:9,13,17 24:4 | 169:10 197:17 |
| 302:7 322:5 | 315:5,12,15 | 322:6 323:1 327:5 | 31:11 34:2,5 35:8 | promoting 193:13 |
| 373:20 374:18 | 338:20,20 339:5,7 | 328:22 329:16 | 35:11,12 40:8 | promptly 202:8 |
| 378:12 379:2,8,22 | 339:15 346:22 | 350:16 352:14 | 45:21 52:22 57:16 | promulgate 249:1 |
| 380:6 381:2 | 365:8 366:5 380:9 | 359:10 362:7,12 | 59:5,21 65:2 | prone 260:20 269:6 |
| processor 347:5 | 384:20 | 370:7,17,19 371:2 | 66:12 83:8 86:16 | 271:8 |
| 380:22 | production 11:15 | 371:6,8,10,11,13 | 96:5 112:11 114:4 | pronounce 248:6 |
| processors 33:20 | 32:13 33:9,11 | 371:17 372:12 | 117:11 119:12 | pronouncing 377:3 |
| 34:17 | 42:12 43:6,16 | 373:11 374:17 | 120:18 144:13 | proof 139:20 |
| process-based 53:2 | 44:6,7,12 51:17 | 377:16 387:5 | 161:15 163:7,8 | Prop 381:22 393:7 |
| proclamations | 52:17 67:22 75:14 | productions 370:12 | 164:5,8 165:4 | propane-intensive |
| 184:10 | 75:17 81:2 88:3 | productive 196:11 | 180:9 186:3 189:3 | 177:6 |
| produce 11:12 22:2 | 88:10,22 89:22 | 196:19 | 190:4 192:17 | properly 38:19 |
| 110:10 130:11 | 91:7 92:21 93:20 | products 9:11 22:2 | 228:20 230:11 | 71:11 214:13 |

| | | | | |
|----------------------------|----------------------------|----------------------------|---------------------------|---------------------------|
| 260:1 337:3 | 260:15 261:19 | 373:14 374:1 | public-private | 198:13 224:6 |
| property 38:19 | 262:3 263:9 323:1 | provisions 321:6 | 147:13 | 225:11 226:9 |
| 270:13,15,16 | 326:9 338:22 | Provista 125:6 | published 41:14 | 245:18 250:9 |
| prophylactic | 339:2 359:12 | 339:5 | 43:12 44:5,20 | 258:19 290:7 |
| 104:13 | 380:1 394:13,13 | pruning 115:10 | 58:3 59:17 73:15 | 298:9 299:3 |
| proposal 39:22 | protected 376:2 | 194:20 | 89:20 | 301:15 308:16 |
| 40:15,19,20 41:4 | 385:16 | public 3:8,12,19 | pull 119:1 134:7 | 324:9 325:2,8,11 |
| 74:14 77:11,20 | protecting 241:15 | 4:9 5:3 8:4,12,18 | 177:8,10 318:17 | 325:21 328:6,8 |
| 96:10 120:7,11 | 322:13 | 12:7 19:17,21 | pulled 176:9 | 331:8 335:5 353:5 |
| 129:4,5,18 144:10 | protection 362:22 | 22:7 40:14,16,17 | pulling 175:21 | 354:19 367:7 |
| 144:11 145:11 | 363:18 380:8 | 41:1 43:14 61:11 | pullulans 109:17 | 396:11 |
| 149:13 285:7 | 388:5 | 66:17 70:13,14 | pulse 271:18 | puts 71:4 143:20 |
| 290:7,8 296:7 | protective 387:3 | 80:9 84:19 91:15 | purchase 79:8 | 162:8 361:6 |
| 297:16 298:20 | protects 33:15 57:8 | 91:18 113:1 | 103:22 | putting 29:13 |
| 299:16,17,21 | protocol 260:14 | 133:17 135:8,11 | purchasing 353:7 | 43:18 126:11 |
| 300:6,8,11,13,15 | protocols 189:5 | 135:13,19 137:6 | pure 72:3 | 135:2 186:8 |
| 300:18 301:18 | 338:18 350:13 | 138:18 157:2,3 | purity 75:19 76:8 | 201:17 214:11 |
| 304:18 305:1,10 | 354:20 394:2,3 | 169:7,12 170:9 | 79:20 106:1 | 309:15 329:20 |
| 305:15,16 307:22 | proven 87:11 | 171:18,21 172:9 | 107:19 167:14 | 332:10 |
| 308:7,11,12,14 | 108:22 117:20 | 172:10,12 185:8 | 324:3,10 325:4 | puzzled 139:13 |
| 310:10 313:18 | 255:13 257:20 | 210:1,16 215:5,12 | 330:19 338:9 | PVC 302:9 |
| 363:7 372:3,5 | 262:10 | 217:1,15,17 | 342:9,15,19 | P-R-O-C-E-E-D-... |
| 373:21 375:17 | provide 46:4 47:20 | 227:16,22 228:16 | 343:14 345:12,17 | 4:1 |
| proposals 13:19 | 58:4 59:9 60:7,10 | 237:14 238:15 | 346:3 351:3 383:8 | p.m 204:22 205:2 |
| 39:19 40:9 144:5 | 60:13,19,21 61:6 | 241:18,20 271:12 | 383:8 386:17 | 283:12,13 397:7 |
| 319:22 | 89:11 100:11 | 272:14 282:15 | purpose 171:21 | |
| proposal's 77:15 | 144:1 145:7,8 | 290:11 291:1 | 281:11 297:16 | Q |
| propose 233:4 | 146:11 150:8 | 293:19 297:12 | purposes 53:21 | qualifications |
| 296:2,10 361:18 | 179:17 203:12 | 299:16 304:5 | 72:22 296:3 | 51:13 |
| 362:19 363:9 | 218:21 219:14 | 321:8,22 323:14 | pursue 330:11 | qualified 173:5 |
| proposed 41:6,14 | 222:10 232:5 | 323:18,22 324:12 | 331:2 | qualifies 318:22 |
| 41:19 50:14,16,21 | 248:15 321:3 | 326:4 328:10 | pursuing 231:6 | quality 8:9 9:8,22 |
| 101:7 232:15 | 323:21 324:5 | 330:14 334:6 | 284:22 | 198:22 229:13 |
| 260:20 333:16 | 336:14 341:9 | 335:4 336:11,12 | pursuit 359:13 | 254:5 359:22 |
| 373:6 378:5 | provided 44:18 | 344:19 374:15 | purview 356:16 | quantity 82:9 |
| proposes 106:18 | 48:19 88:20 89:19 | 375:5,9,14,16,16 | push 79:14 349:20 | 226:7 |
| 172:2 | 147:4 306:14 | 375:19,21 376:3 | pushed 187:8 342:7 | quarter 202:7 |
| proposing 95:20 | 308:5 313:13 | 376:10 380:4 | pusher 280:9 | Quebec 108:7 |
| 102:19 | 331:21 | 383:5 387:1,6,16 | pushing 216:5 | question 20:7 |
| Proposition 386:7 | Providence 24:22 | 388:3,8 | put 13:18 65:10 | 27:11 28:10 35:10 |
| proprietary 293:1 | 52:9 206:15 | publically 61:13 | 66:12 72:18 73:4 | 73:8 92:17 100:5 |
| 293:3 | providers 343:15 | publication 124:16 | 77:13 109:2 | 101:22 111:1 |
| prospect 117:9 | provides 37:5 | 126:12,14 | 113:11 124:16 | 123:14 125:13 |
| protect 96:4 109:16 | 38:11 194:21 | publications 68:4 | 131:1 133:22 | 126:2 127:5 128:2 |
| 122:6 123:21 | providing 37:17 | Publicize 57:8 | 148:19 151:9 | 135:5 147:18,20 |
| 125:6 167:14 | 79:12 179:7 216:7 | public's 44:2 169:2 | 170:19 181:6 | 147:21 151:9 |
| 233:21 254:4 | provision 114:17 | 170:21 | 186:3,5 191:12 | 152:10 155:8 |

| | | | | |
|-------------------------|----------------------------|-----------------------------|--------------------------|---------------------------|
| 156:20 166:4 | quickest 270:6 | rationale 365:16 | 57:17 58:2 62:22 | 367:1 |
| 187:1 193:20 | quickly 121:7 | 368:4 | 64:18 65:5 82:6 | reasonable 54:22 |
| 202:10 207:4,5,7 | 179:12 324:22 | rationally 348:8 | 85:7 108:1 109:21 | 55:1,12 64:6,18 |
| 212:4,12 213:9 | 326:3 327:6 | reach 388:3 | 113:8 114:19,21 | 95:11 96:3,8,12 |
| 214:3,9 218:7 | 338:15 365:2 | reaction 391:18 | 122:3,17 124:12 | 96:22 98:8 392:8 |
| 219:2,16 227:20 | quiet 143:13 | reactions 294:11 | 133:22 143:10 | reasonably 296:17 |
| 245:4 248:3 255:8 | quite 4:7 37:3 69:1 | read 158:19 175:1 | 158:10 160:1 | reasons 31:17 46:7 |
| 261:7 265:21 | 69:6 159:9 230:4 | 189:10 213:20 | 179:6 180:1,9 | 53:20 113:1,2 |
| 280:14 282:1 | 242:13 250:6 | 242:22 243:2 | 185:11 186:7,9,13 | 169:12,15 174:16 |
| 285:18 291:17,20 | 252:2 270:4 345:2 | 286:8 306:12 | 187:10 188:20 | 201:13 269:18 |
| 293:14 298:18 | 346:14 382:20 | 360:2 387:4 | 189:6,9 190:7 | 271:22 375:8 |
| 302:1,8 303:6 | quotation 17:6 | reading 139:20 | 191:7,19,20,22 | 376:7 |
| 305:10 307:3 | quote 93:21 327:10 | 157:18 177:20 | 192:11,19 194:8 | reassure 371:21 |
| 309:18 310:18 | quoted 332:3 | 189:13 302:11 | 195:22 197:1 | rebar 302:16 |
| 318:21 319:19 | | 307:5 322:15 | 206:19 209:2,9 | rebellion 170:11 |
| 351:17,19 352:5 | R | 377:11 | 210:18 214:9,19 | recall 6:3 142:6 |
| 354:4 360:10 | rabbit 384:2 | readjust 86:11 | 215:17,17 218:15 | receive 105:5 |
| 365:13 373:14 | rabble-rouser | ready 86:12 94:16 | 219:17 221:4,8 | 254:12 259:13 |
| 387:12 | 381:21 | 115:17 136:15 | 222:22 224:3 | 266:4 299:2 |
| questioning 20:7 | race 93:1 | 138:10,13 153:9 | 226:19 227:20 | 303:16 |
| questions 15:11 | railroad 204:12 | 257:22 282:13 | 230:1,11 244:18 | received 24:18 |
| 19:22 20:14 25:3 | raise 16:16 253:22 | 283:6,7 304:4 | 246:15,22 247:6 | 70:21 190:1 280:6 |
| 27:8 60:13,21 | 332:9 393:12 | 328:7 336:10 | 248:12 250:6 | 287:11,21 291:6 |
| 65:12,13,22 70:20 | raised 151:22 | reaffirms 38:2 | 259:1 261:10,15 | 293:12 295:10,16 |
| 73:5,7 78:12 | raises 255:8 256:5 | real 10:17 16:11 | 268:12 272:18 | 296:6 299:14 |
| 85:19,22 91:3 | raising 29:20 | 39:7 52:7 98:18 | 273:5,7,21 281:11 | 321:7 324:2,6 |
| 99:2 109:8 121:4 | ramifications | 109:2 124:9 131:7 | 286:7 288:19 | 326:7 327:10 |
| 123:1,3 141:20 | 227:17 | 154:7,20 197:4 | 290:22 294:3,18 | 359:3 |
| 143:2 148:20 | ramp 108:14 | 209:6,6,14 210:9 | 294:19 295:6 | receives 39:6 |
| 152:1,16 153:5 | randomized 211:16 | 217:16 236:20 | 298:8 301:14 | reception 306:17 |
| 159:11 163:19 | Rangan 204:17 | 354:19 390:22 | 303:14,17 307:7 | 309:22 310:4 |
| 172:20 176:14 | 206:3,5 211:2,19 | realistic 35:22 88:1 | 316:5,9 317:8 | recess 397:4 |
| 199:7 210:12 | 212:3 214:8 | realistically 203:5 | 324:19 326:22 | recipe 98:5 223:15 |
| 211:14 215:13,17 | 215:15 218:18 | realities 97:17 | 328:2 329:13,18 | recipes 241:16 |
| 218:5,20 235:16 | 222:21 225:5 | reality 79:20 | 331:1,8 332:18,20 | 295:3 |
| 238:19 242:6 | 228:14 230:18 | 215:11 269:8 | 333:9,20 335:8 | recipients 359:5 |
| 247:9 256:21 | range 9:2 149:4 | 275:15 292:22 | 336:17 337:1 | reclaim 356:18 |
| 296:13 299:3,4,5 | 273:15 303:10 | 348:3 | 351:18 354:13 | recognition 84:8 |
| 305:13 308:17 | rapidly 178:4 | realize 139:4 289:1 | 377:22 387:5 | recognize 13:16 |
| 309:20 314:10 | rapidly-changing | 329:7 391:4 | 388:9 389:4,10,21 | 38:1 140:22 |
| 325:1,19 335:3,5 | 76:1 | 394:18 | 391:5 393:5 394:4 | 196:18 197:13 |
| 335:6,7,8 360:4 | Raptors 232:9 | realized 247:19 | realm 60:2 158:16 | 222:8 294:21,22 |
| 365:5 372:21 | rare 77:7 | 289:21 326:12 | reason 136:3 | 332:15 377:4 |
| 376:14 381:11 | rate 182:16 340:21 | really 13:20 19:8 | 170:17 200:2 | recognized 106:21 |
| 386:2 389:11 | 352:7 | 32:14,16 35:20 | 220:22 237:18 | 200:7 |
| 395:12 396:4,5,8 | rational 243:16 | 46:16 48:1 50:2,4 | 246:16 290:21 | recognizing 197:3 |
| quick 187:14 | 345:8 | 52:6,22 54:11 | 322:3 346:12 | recollection 236:8 |

| | | | | |
|--------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| recombining 362:1 | recusing 68:18 | 236:17 268:5 | 355:8 | 223:10 230:20 |
| recommend 19:3 | red 21:2,2,11 54:6 | 324:6 350:1 | reinforcement | 307:5 |
| 77:1 107:6 144:12 | 54:13 249:22 | regarding 45:13 | 332:16 | remembered |
| recommendation | reduce 32:11 55:20 | 47:19 75:1 76:2 | reintroduce 250:20 | 150:17 |
| 36:7,13,22 37:10 | 62:21 63:17 | 76:18 89:12,21 | reissuing 296:6 | remembering |
| 41:10 47:9 51:14 | 280:22 298:11 | 105:22 144:8 | reiterate 15:14 | 31:21 |
| 75:3,6 80:20 82:4 | reduced 167:4 | 145:10 152:6 | 89:15 | remind 5:6 19:10 |
| 82:12 86:22 89:13 | 271:22 305:1 | 253:18 254:13 | reject 164:10 241:4 | 195:9 231:12 |
| 89:14 102:18 | 363:21 364:13 | 374:7 379:7 | 366:5 | 278:2 |
| 126:4 149:19 | reduces 270:7 | regardless 359:3 | rejected 113:17 | reminded 270:2 |
| 151:17 242:2 | reducing 51:21 | regards 100:19 | rejection 164:9 | removal 100:21 |
| 266:5,8,13 282:10 | 277:17 366:17 | 253:12 317:4 | 248:7 | removals 48:18 |
| 286:8 290:16 | reduction 34:20 | 350:4 | relate 37:7 154:22 | remove 92:6 |
| 291:3,5 295:19 | 176:21 | regiment 167:4 | 295:7 | 196:16 218:9 |
| 305:2 309:2 311:3 | Reed 160:11 | region 86:19 92:19 | related 3:12,19 8:9 | 372:15 |
| 331:7 335:2 336:7 | 205:12 | 231:22 | 14:20 106:9 | removed 96:11 |
| 336:11 343:20 | Reedy 160:12 | regions 87:13 | 194:11 215:10 | removing 80:14 |
| 373:6,15 376:8,9 | 205:14 | register 48:12 | 223:20 224:11 | 199:18 |
| 378:2,5 | reemphasize 63:12 | 73:13 97:2 | 317:6 326:20 | renewed 247:10 |
| recommendations | reevaluated 311:8 | registered 94:18 | 338:3 | repeatedly 238:8 |
| 31:14 36:5,21 | refer 142:17 | 109:12 122:5,6,7 | relates 215:19 | 344:18 |
| 42:13 43:18 44:15 | 198:10 287:7 | 339:2,8 | 328:22 330:3 | replaced 239:16 |
| 47:15,22 64:12,13 | 328:13 329:12 | registration 97:5,6 | relating 194:1 | replacement |
| 64:21 65:6,10 | 360:11,22 365:7 | 175:1 177:18 | relationship 30:5 | 204:10 |
| 90:4 95:18 278:7 | reference 278:22 | regular 276:17,20 | 111:18 381:17 | report 3:4 38:1 |
| 287:6 310:20 | 311:18 | 346:6 | relative 166:12 | 45:5,11,22 46:12 |
| 320:19 343:1,11 | referenced 279:8 | regulate 183:4 | 279:1 | 46:18 49:6 76:12 |
| recommended 36:7 | references 47:14 | 364:17 373:22 | relatively 199:12 | 124:15 142:4 |
| 45:7 47:16,17 | 368:16 | regulated 36:17 | 269:22 | 152:2 169:19 |
| 286:4 315:10 | referrals 360:14 | 79:6 146:22 183:2 | relaxed 66:8 | 170:4 341:21 |
| 367:1 | referred 286:5 | 364:3 | release 211:4 | reporters 208:22 |
| recommending | 329:8 | regulation 41:10 | relevant 90:21 | reporting 139:17 |
| 64:11 | referring 190:16 | 66:9 144:16 | 337:22 | 329:14 |
| reconsidering | refine 291:19 | 151:11 152:6,11 | reliance 113:4 | reports 36:4 49:8 |
| 176:11 | refined 22:18 | 174:11 187:19 | relief 153:16 | 206:6 210:4 |
| record 24:13 25:1 | refining 22:1 | 190:19 248:21 | rely 111:4 | 254:10 304:19 |
| 53:12 59:8 136:17 | reflect 48:21 163:1 | regulations 36:12 | relying 110:3,4 | 305:8,8 316:6 |
| 204:21 283:12 | 198:7 307:12 | 37:7 48:1 60:9,10 | remain 146:10 | represent 12:7 |
| 329:17 397:7 | 308:11 359:15 | 60:12 89:3,7 90:2 | 175:12 181:16 | 22:11 40:12 133:4 |
| records 53:16 | reflects 170:5 | 115:9 150:20 | remaining 196:16 | 211:7 261:5 |
| 56:20 60:1 64:6 | reforming 289:21 | 151:8,10,12 153:1 | 306:16 | representative 8:18 |
| record-keeping | reformulating 72:5 | 239:18 | remains 80:17 | 12:10 38:9 108:2 |
| 55:12 56:19 58:3 | reformulation | regulators 184:11 | remarks 377:12 | 274:9 338:7 |
| 63:17 | 256:14 | regulatory 53:1 | remediation | representatives |
| recusal 39:22 | regard 92:20 97:16 | 85:4 96:12 99:18 | 329:19 | 37:9 38:3,6 |
| recusals 40:1,9 | 100:13 224:18 | 116:2 184:18 | remedy 393:21 | represented 39:5 |
| recuse 359:2,11 | 225:4 234:13 | 239:9 241:21 | remember 139:8 | 40:7 343:4 |

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| representing 39:14 74:4 100:16 116:4 150:13 215:6 257:9 260:13 301:9 382:10 | 87:10 88:4 92:18 93:2,5,6 100:11 100:19,22 101:2,2 101:4,15 117:5,14 130:21,22 131:11 139:21 145:18 177:12 211:22 241:16 245:21 254:22 267:1 295:4,5 296:18 308:18 318:6 331:2,9 338:19 339:18 340:1 344:1 375:10 | resistant 110:1 156:18,22 157:8 181:19 212:18 226:4 249:16 260:18 | 75:4 374:2 379:18 | retailers 9:7 |
| represents 79:7 153:19 192:11 | researched 151:4 256:11 | resolution 88:17 146:13,20 | responsibility 132:15 197:14 228:7 320:18 333:3 347:22 348:5 355:3 357:11,20 379:17 | retain 35:21 68:11 118:2 255:4 |
| reproduces 367:11 | researchers 87:19 117:4 118:20 132:1 232:3 246:17 257:18 | resolved 198:1 | responsible 14:18 257:7 322:17 | retaining 117:3 146:6 |
| reproducing 367:6 | research-support... 118:11 | resort 104:22 115:1 191:9,16 192:14 260:15 265:4 | rest 94:10 132:21 219:19 256:19 | retire 208:16 214:12,18 221:3 226:17 248:20 |
| reproduction 362:3 | reserved 396:10 | resource 45:19 231:10 | restart 66:19 136:14 | retirement 248:18 249:3 |
| reps 102:9 251:2 | reservoirs 238:5 | resources 35:10 55:6 60:3 71:10 74:17 185:17 231:14 234:16 282:17 298:4 300:4 325:15 372:6 | restate 138:20 | retiring 52:9 214:19 |
| reputation 239:2 | reside 311:4,5 | respect 4:8 18:9,14 21:2,5 78:11 97:10 101:12 137:2 152:21 247:10 283:17 351:7 355:17 | restore 170:20 171:12 172:9 | retraining 58:16 |
| request 47:2 87:10 124:7 125:19 140:9 144:11 238:14 300:13 301:12 343:15 371:5,7 | residual 252:3 | respectfully 107:5 300:13 | restoring 169:1 | retroactively 295:12 |
| requested 37:11 47:3,11 297:6 305:5 | residue 44:17 45:1 45:3,21 155:22 196:22 213:6,13 | respective 24:3 | restraints 22:4 | return 35:4 204:18 |
| requesting 48:16 49:2 296:22 298:22 | residues 82:9 102:12,21 103:2,7 155:10 212:1,8,11 212:13 213:1,5,5 288:2 371:12 | respects 97:1 | restricted 173:18 353:1 | revamped 324:1 |
| requests 18:16 49:7 107:5 | resist 223:18 268:8 332:12 | respond 36:20 44:22 83:8 127:3 148:20 169:20 199:3 | restricting 154:19 | reverse 8:3 98:18 |
| require 62:17,19 120:12 232:19 305:19 | resistance 82:11 133:8 135:11,12 154:11 158:12,17 197:4 210:9 212:6 212:7 213:1,17 217:2,5,11 222:16 223:9,15,20,21,22 224:4,6,10 225:13 225:14,15,20,21 226:5,10 235:5 237:15 238:5 | respectfully 107:5 300:13 | restriction 47:19 174:13 340:20 | reversed 98:22 |
| required 62:5 63:8 72:6 73:11 76:3 164:1 166:17 167:7 169:22 347:1 | | respecting 152:22 | restrictions 47:16 89:17 174:2 340:10,14 345:6 | review 7:15,16 43:2 47:2 69:16 74:15 83:10,20 90:10,19 97:11 106:5 120:14,18 139:5 144:7 149:22 156:8,10,11,16 171:12 179:2 180:19 199:20 212:15 234:14 238:2 248:19 249:7 279:6 287:9 292:12 296:14,15 296:19 297:3 298:1,14 299:2 300:1,3,10 303:9 304:16 305:18 306:7 307:15 311:3,17 316:14 327:8 328:7 337:3 371:9 372:1 |
| requirement 228:12 349:16 | | responded 36:8,12 193:8 236:4 258:11 | restrictive 183:9 269:13 | reviewed 71:10 82:22 111:17 119:20 242:1 290:4 371:18 |
| requirements 42:16 46:12 54:1 55:13 59:11 63:18 64:8 73:16 147:9 240:16 340:10,15 341:4 346:16,18 355:5 379:14 | | respondents 211:15 | resubmitted 140:12 | reviewer 111:18 |
| requires 60:6 163:8 177:4 347:8 | | responding 44:17 | result 98:16 103:8 118:19 149:1 213:6 279:10 | reviewers 374:15 |
| requiring 167:3 | | response 31:11 93:14 106:11 153:2 218:6 219:12 254:12 326:8 344:10 | resulting 75:5 114:14 124:15 | reviewing 80:14 |
| research 76:8 87:2 | | responsibilities | results 44:17 45:1 101:14 109:19 116:21 118:22 126:10,13,16 142:7 184:22 211:1 289:15 379:3 | |
| | | | resume 151:6 | |
| | | | resumed 136:18 204:22 283:13 | |
| | | | retail 254:7 346:20 | |
| | | | retailer 138:19 | |

| | | | | |
|----------------------------|---------------------------|---------------------------|---------------------------|------------------------------|
| 83:22 90:12 | 121:2 123:22 | room 126:21 | 254:14,17 255:13 | 368:6 389:15 |
| 171:10 191:11 | 128:1 129:15,17 | 227:19 244:21 | 322:2 383:20 | 391:3,15,19 392:4 |
| 294:16 299:1 | 134:19 135:15 | 247:20,22 250:17 | safeguard 325:18 | 395:5,6,8 |
| reviews 34:13 37:4 | 137:17 139:10 | roots 168:12 | safety 8:10 10:1 | says 42:8 51:9 |
| 59:21 68:2 74:14 | 153:5 168:3 | rootstocks 193:4 | 116:3 184:10 | 62:12 69:1 84:20 |
| 74:19 75:5,8 | 170:14 171:22 | 269:17 272:3,6 | 206:5 210:3 211:6 | 233:18 267:12 |
| 108:18 284:12 | 173:2 178:14 | rotates 201:3 | 232:12,15,18 | 279:16 285:14 |
| 298:12 307:11 | 179:9 235:16 | Rouge 10:20 | 237:11 242:10,21 | 309:6 381:20 |
| 310:9,11,19 370:8 | 256:21 263:10 | roughly 92:15 | 254:5 278:18 | scale 111:6,8 203:2 |
| 372:5 374:21 | 281:6 282:3 293:5 | 100:7 | 314:7 374:7 379:3 | scare 196:19 |
| revise 48:18 | 308:6,19 309:21 | round 5:9 17:17 | 386:17 | scared 248:9 |
| revised 49:3 59:15 | 319:9 320:10 | 226:15 | sails 246:18 | scenario 154:6 |
| 290:5 | 329:7 330:13 | rounds 5:10 | sale 272:8 | 318:4 |
| revising 58:10 | 337:9 346:19 | routes 158:13 | sales 34:12 35:3 | schedule 18:5 71:9 |
| revisions 58:14 | 368:17 372:21 | routine 164:15 | Salinas 175:19 | 71:19 136:21 |
| 59:21 120:8 | 376:20 378:6 | row 263:1 285:16 | salt 175:1 242:3 | 195:8,9 235:2 |
| revisiting 311:2 | 381:12 383:20 | 341:15 351:20 | 243:13 | 282:9 283:17,19 |
| revolt 170:9 | 388:11 390:13 | Rubinettes 272:21 | sample 328:10 | 337:14 389:3 |
| reward 220:7 | rightfully 374:9 | rule 41:7,14,20 | 345:15 363:8,13 | 397:3 |
| rewarding 4:13 | rigorous 120:17 | 45:3 50:14,16,21 | sampling 45:13,17 | scheduled 282:20 |
| rewording 361:21 | rigs 175:21 | 68:3 75:7 76:18 | 271:17 278:21 | 283:1,5,19,22 |
| reworking 58:10 | rip 92:1 | 111:5 189:10 | 325:12 | 304:8 395:20 |
| rewritten 239:10 | rise 253:9 | 239:17 278:17 | Sanders 94:19 | 396:15 |
| 301:1 | rising 162:11 | 321:6 333:19 | sane 197:11 | schedules 18:16 |
| re-listed 226:15 | risk 117:19 122:12 | 334:11,12,20 | sanitation 110:1 | 355:18 |
| Rhode 24:22 | 122:13 154:10,13 | rulemaking 14:18 | sanitize 371:14 | scheduling 137:22 |
| rice 254:2,11 255:4 | 154:13,19 162:9 | 50:13,20 65:3 | sanitizers 145:3 | scheme 53:1 |
| Richardson 1:21 | 164:20 251:13,13 | 151:18 152:4 | 286:14 | Schnabel 157:6 |
| 8:16,17 17:5 | 254:15 256:4 | rules 98:8 232:16 | Santa 9:21 233:17 | school 244:11 |
| 102:8 103:11 | 262:9 | rule's 320:20 | save 93:21 314:5 | science 10:18,18 |
| 127:16 155:9 | risks 102:14,17 | run 94:14 115:20 | 349:6 371:22 | 13:4 82:7 97:16 |
| 165:6,18,22 182:7 | 103:17 107:16 | 204:11 230:20 | 372:6 | 157:21 169:15,17 |
| 183:17 211:18,20 | 127:5,7 160:2 | 282:16 283:2 | saved 298:5 | 170:8 258:17 |
| 214:2 251:1 261:8 | 180:20 251:11 | 356:7 396:2 | saving 168:22 | 313:22 358:6 |
| 261:13,18 316:22 | 297:13 | rung 216:9 | saw 58:2 273:12,15 | scientific 68:4 |
| 319:6 350:3 | River 161:9 257:6 | rungs 216:11 | 281:7 304:12 | 155:13 156:6 |
| rid 227:10 369:8 | 257:10 | running 123:22 | 315:11 342:1 | 157:19 158:1,6 |
| rig 177:8 | RNAI 390:18 | 137:5 176:3 | 344:18 386:10 | 210:9 213:9 |
| right 5:22 8:22 | road 15:22 119:15 | runs 29:11 210:3 | saying 30:11 119:3 | 225:10 375:9 |
| 13:9 21:15 25:20 | roam 28:8 | 267:16 | 134:2 159:22 | scientifically-bas... |
| 26:1 28:12,16 | Robert 17:8 | rural 32:19 195:18 | 166:12 178:13 | 217:16 |
| 29:3 30:21 36:2 | robust 108:20 | rush 209:14 | 187:21 188:3 | scientist 7:9 13:2 |
| 52:3,16 54:15 | Rocky 67:7 | Ryan 178:13,14 | 189:4 212:4 | 68:6 155:17 157:4 |
| 65:21 66:16,21 | rodents 232:10,14 | | 220:20 221:12 | 157:17 206:8 |
| 67:2 70:21 73:20 | role 266:3 | S | 227:9 251:8 | 210:3 211:21 |
| 78:13 92:2 95:3 | roles 301:4 | sad 67:4 249:22 | 307:21 315:16 | 379:5 |
| 102:16 105:11,17 | roll 26:5 | safe 168:21 197:11 | 344:21 351:12 | scientists 159:13 |

| | | | | |
|---------------------------|----------------------------|--------------------------|----------------------------|----------------------------|
| 175:3 217:18 | 69:4 166:11 338:2 | 346:6 348:8 | sees 280:20 | 6:4,6,12 7:14,19 |
| 247:4 368:19 | 338:6 343:2,12 | 349:20 351:14,15 | segregation 90:13 | 8:19 9:13 10:11 |
| 374:14 | 344:3 354:17 | 375:5 382:16 | selection 110:1 | 10:15 11:17 12:4 |
| scootch 137:7 | Secretary's 3:4 | 383:17 387:15 | selectively 368:8 | 12:13 13:7 14:4 |
| scope 34:11 74:13 | secrets 293:6 | 393:15 395:18 | sell 9:11 238:10 | 37:9 70:1 233:13 |
| 74:19 167:16 | 379:10,12,15,16 | seed 43:5,7 75:19 | 266:20 271:11 | 281:11 293:7 |
| 200:16 284:12 | 380:2 | 76:10 106:1 | 380:6 | 337:20,21 |
| 295:22 300:9 | section 145:6 | 107:19,20 113:15 | selling 70:11 | served 288:19 |
| 304:18 305:1,7,13 | 168:19 285:10,13 | 113:18,20,21 | 343:18 346:20 | service 1:1 13:5,17 |
| 306:7 310:8,10 | 293:10 | 114:2,2 164:4,16 | send 65:17,19 | services 7:12 33:13 |
| 370:8 372:4 | sections 74:20,22 | 164:20 167:22 | 198:18 202:6 | 95:6 232:6 |
| scrambling 279:18 | 279:9 | 324:3,10,17 325:4 | 294:1 | session 40:2,5 |
| scroll 137:12 | sector 185:16 | 325:17 327:4,14 | sending 224:8 | 136:14 137:3 |
| 291:18 | 353:20 | 327:19 328:5,10 | senior 150:11 | 138:6 205:6 |
| scrutinized 241:14 | secure 296:19 | 328:11 329:1 | sense 93:12 96:20 | 283:15 |
| scrutiny 312:2,6 | securing 117:10 | 330:5,19 338:9 | 103:17 159:6,18 | set 17:3,6 25:21 |
| 380:13 | see 14:6 16:16 21:1 | 342:9,15,19 | 167:7 225:3 260:3 | 38:6 68:22 71:12 |
| se 237:4 | 21:3 56:9 66:18 | 343:14,15,17 | 331:4 373:10 | 118:16 119:1 |
| seal 33:7 162:22 | 76:12 79:11 83:21 | 345:12,17 346:3 | 395:4 | 121:9,17 143:7 |
| 189:3,7 341:18 | 84:9 85:19 90:10 | 348:7,15 349:5,6 | sensible 23:16 31:9 | 204:4 213:1 |
| 353:16 382:21 | 100:10 102:3 | 349:7,13 351:2,3 | 52:2,4,5 54:4 56:5 | 245:16 246:20 |
| 383:17 | 121:7,22 124:14 | 351:3,7 352:22 | 56:7,8 58:10 63:5 | 250:18 271:4 |
| seals 285:15 | 125:1 126:5 129:6 | 353:1,7,10 354:7 | 63:21 64:6,10,18 | 275:6,7 285:16 |
| searchable 46:2 | 131:2 133:17 | 354:7 363:3 | 66:7,14 74:15 | 346:18 351:21 |
| searching 185:11 | 134:3,16 135:22 | 365:14 367:2,2 | 77:13 78:7 95:15 | 362:21 363:4 |
| seasoned 279:2 | 136:1,5 138:7 | 368:1 384:18 | 95:17 99:4,6 | 365:21 366:12,13 |
| seat 7:9 9:7 10:8 | 154:7,13 155:3,3 | seedlings 42:11 | 196:2 233:1 | 366:16 |
| 205:4 | 155:12 157:15 | seeds 42:10,14,15 | 277:13 278:22 | sets 9:10 358:19 |
| seats 30:20 136:20 | 158:21 160:7 | 240:9,17 321:21 | 280:1,15 299:22 | setting 63:5 69:10 |
| 343:6 | 168:19 181:16 | 326:11 328:17 | sensory 253:20 | settling 197:22 |
| Seattle 138:19 | 182:3 183:5 | 349:15 363:8,13 | sent 37:21 49:9 | seven 328:9 386:8 |
| 244:21 249:14 | 185:13 205:11,22 | 367:13 | 279:17 289:15 | seventeen 209:16 |
| second 28:12 58:15 | 213:13 214:20 | seeing 19:3 85:12 | 381:4 | seven-state 231:22 |
| 92:16 106:1 | 229:20 230:9 | 119:14 123:19 | separate 151:10 | severe 87:7 264:20 |
| 117:12 121:2 | 232:22 233:6 | 125:5,20 143:20 | 310:18 | 264:20,21 267:13 |
| 123:14 126:1 | 241:18 246:20 | 160:5 209:10 | separately 365:12 | severely 356:19 |
| 206:1 284:15 | 268:4,4 273:16 | 280:2,20 295:19 | September 49:16 | sexual 362:2 |
| 338:4 345:19 | 289:8 290:5 | 346:14,16 390:13 | 58:4 | shame 68:16 |
| 365:13 375:19 | 291:15 293:18 | seeking 331:7 | series 26:2 43:17 | 250:17 |
| secondary 213:16 | 294:6 295:1 | seemingly 258:3 | serious 71:14 98:16 | shape 233:6 |
| 357:18 358:13 | 302:13 304:11 | seen 98:16 114:16 | 184:2 222:4 223:7 | share 35:8 133:21 |
| secondly 83:14 | 312:17 313:2,15 | 153:19 183:16 | 227:18 255:8 | 141:21,22 201:4 |
| 200:16 | 313:19 314:3 | 244:17 265:13 | 256:5 323:12 | 211:6 231:4 242:8 |
| secrecy 376:12 | 315:9,17 316:1,2 | 277:14 281:15 | seriously 4:20 | 279:4 344:17 |
| secret 68:3 171:11 | 316:9,10 318:6,15 | 289:6 330:21 | 135:12 300:16 | 379:21 382:14 |
| 384:13 | 319:5 333:1 | 341:16 362:13 | 344:14 | shared 215:2 |
| Secretary 24:7 | 341:20 345:3,6 | 395:2 | serve 4:12 5:15 6:2 | 331:14 |

| | | | | |
|---------------------------|----------------------------|----------------------------|---------------------------|----------------------------|
| sheep's 27:15 | Sierra 273:1 | 387:4 | slope 229:15 | 180:2 203:18 |
| sheet 137:20 175:2 | sight 269:20 | sites 329:16 | 230:10 269:19 | 260:21 261:1 |
| shelf 256:15 | sign 19:19 94:18 | sits 279:5 | slow 28:20 118:19 | 339:6,8 340:9 |
| shift 127:9 | 242:17,18 373:19 | sitting 20:6 21:15 | 328:3 | 347:8 |
| ship 270:17 | 374:19 | 228:8 387:18 | slower 99:8 | solutions 343:8 |
| shipments 369:10 | signage 139:15 | 388:13 | small 7:13 12:3 | solve 104:5 180:22 |
| Shistar 160:18 | signal 198:18 199:2 | situation 96:14 | 35:5 55:19 65:1,4 | solvents 286:10 |
| 168:7,8 | 199:5 344:2 | 99:21 117:22 | 71:11 93:1 259:16 | 311:15 |
| shocked 81:12 | signatures 243:7 | 125:11 135:17 | 351:21 | somebody 92:1 |
| 372:9 391:22 | signed 85:17 86:5 | 154:15 188:16 | smaller 72:16 | 153:16 174:19 |
| shoppers 139:6,7 | 94:15 137:6,11,19 | 319:3 335:17 | 259:16 | 252:5 274:22 |
| 139:11,16 140:13 | 238:17 243:6 | 350:4,7 354:11,15 | small-scale 5:20 | 392:13 |
| 141:7 142:5 | 337:11 338:8 | situations 62:6 | 111:8 | somewhat 50:12 |
| Shore 178:11 | significant 100:17 | 88:8 98:20 114:11 | Smith 86:8,14,15 | 111:6 213:12 |
| short 17:8 117:13 | 117:7 158:22 | 168:16 212:6 | 91:8,12,17 92:8 | 280:17 391:13 |
| 117:16 177:22 | 174:5 208:6 | 233:8 294:15 | 92:22 93:15 94:12 | Sommer 160:5,5 |
| 345:18 391:15 | 211:16 293:13 | 295:1 302:18 | snapshot 273:13 | son 11:7 |
| shortage 271:21 | 329:2 341:17 | six 7:1 13:18 42:3 | sneak 333:7,11 | song 153:18,21 |
| shortest 278:14 | 346:7 | 116:7 124:5 | 394:19 | Sonnabend 1:21 |
| shortly 50:15,22 | significantly | 161:14 247:19 | soap 173:14,15 | 3:10 7:7,8 65:18 |
| 290:17 | 158:15 160:1,2 | 248:22 252:9 | 175:1 176:16,19 | 73:8 149:11 159:3 |
| shot 246:13 270:3 | Signing 304:4 | 260:10 262:16 | 178:2 | 175:17 247:12 |
| 309:10 | sign-up 86:10 | 263:15,16 265:3 | soaps 173:20 174:2 | 284:6,8 288:13 |
| shoulder 66:21 | 137:20 | 279:7 299:18 | 174:13,16,22 | 301:19 323:20 |
| shout 16:11 | sign-ups 86:2 | 336:20 | 177:17,21 | 331:20 342:14 |
| shout-out 341:13 | silicon 253:12,20 | size 345:15 364:13 | soccer 304:9 | 360:5,13,16 |
| show 86:10 156:18 | 255:11,19 256:8 | sizes 54:22 | social 256:3 | son's 169:22 |
| 166:15 189:6 | silver 109:22 | skepticism 236:16 | society 157:1,12 | soon 121:17 134:7 |
| 212:14 275:14 | 170:16 | skills 280:22 | 217:13 | 186:3 363:20 |
| 311:14 | similar 74:19 76:12 | skip 82:18 | sodium 50:15,17 | sooner 86:12,13 |
| showed 166:15 | 77:18 108:9,9 | slam 366:3 | 199:13 | 366:16,17 393:20 |
| 384:15 | 112:2,22 170:2,10 | slate 233:5 | soil 13:2,4 64:16 | sophisticated |
| showing 109:19 | 228:15 350:13 | slide 68:21 168:9 | 168:14 175:3,4,6 | 264:13 |
| 126:16 154:11,14 | Similarly 103:3 | 285:21 301:8 | 175:7 183:3 | sorry 28:9 144:19 |
| 208:6 227:22 | simple 57:2 71:20 | 320:14 | 231:14 232:7 | 156:13 202:10,10 |
| 346:6 | 339:19 347:18 | slides 166:16 | 234:17 240:6 | 202:13 207:15 |
| shown 187:10 | simpler 163:15 | 335:10 | 265:7,9,11 286:2 | 221:11 320:10 |
| 386:21 | 277:21 | Sligh 178:14 195:6 | 286:13 288:8 | 324:15,16 360:1 |
| shows 98:12 157:7 | simply 17:13 101:6 | 195:17,18 200:3 | 303:12 306:11 | 361:5 |
| 168:9 186:11 | 105:7 131:21 | 203:10 204:15 | 340:15 | sort 17:6 19:8 20:9 |
| 189:11 239:9 | 171:18 210:5 | slightly 105:2 | soilless 151:11,18 | 20:15 23:9 103:16 |
| sick 210:7 223:11 | 220:20 225:9 | 309:12 | 151:21 | 112:16 113:2 |
| side 159:1,17 | single 110:4 | slim 259:14 317:10 | soils 175:14 235:1 | 143:1 155:18 |
| 181:20 184:14 | sir 94:12 153:5 | slip 381:10 | sold 152:9 | 159:18 182:19 |
| 353:13 387:21 | sisters 66:2 | slippery 229:15 | solicit 375:15 | 194:21 207:12 |
| 393:22 | sit 7:3 11:20 68:13 | 230:10 | solid 123:8 152:21 | 208:18 210:18 |
| sided 140:5 | 225:19 281:20 | sliver 215:21 218:2 | solution 168:17 | 214:14 222:3 |

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 223:16 228:15 251:13 280:17 299:12 303:10 307:14 308:18 326:15 329:8 330:7,12 335:8 349:19,20 350:14 353:12 355:10 396:11 sorts 225:22 sought 266:21 soul 181:14 sound 23:16 31:8 52:2,4,5 54:4 56:5 56:6,8 58:9 63:18 63:20,22 64:10,13 66:7,14 74:14 77:12 95:15,17 99:4,6 127:13 196:2 233:1 277:13 278:22 280:1,14 299:21 313:22 318:7,14 387:3 sounds 54:18 389:1 soups 254:2 sour 161:5 source 162:10 212:16 368:21 376:15 sources 42:21 76:20 213:20 329:15 367:22 sourcing 107:20 south 30:1 Southern 10:19 Southwest 1:11 Soviet 67:13 soy 27:15 352:1,3 352:15 so-called 171:1,15 space 140:8 187:4 270:17 spacing 187:2 194:2,8,10 sparingly 234:22 sparked 238:14 | spawned 391:10 speak 8:22 23:14 29:16 38:4 105:20 137:19 160:22 216:22 253:11 283:22 324:1 375:20 382:12 389:13 speaker 26:9,11,13 26:15,17,19 27:1 27:2,3,4,5,6,10,13 27:17,18,20,22 28:1,3,5,7,9,11,14 28:15,17,18,19,21 28:22 29:3,6,7,10 29:15,19,22 30:3 30:6,7,9,11,13,16 30:18 31:1,3 52:8 speaking 106:7 108:1 130:4 137:18 173:6 217:14 251:20 326:6 328:1 356:2 speaks 130:15 special 18:15,19 387:9 specialist 2:14 7:11 11:5 15:10 specialty 259:13 260:6 specific 60:22 61:11 62:6,7 79:7 81:9 82:15 86:6 124:21 148:8 193:19 233:7 306:13 336:1 361:18 368:21 specifically 84:12 97:4 104:12 126:5 225:4 291:7 329:12 330:3 334:10,13 352:21 373:6 378:15 specifics 46:16 307:22 350:15 specifies 377:16 spectrum 223:4 | spell 180:9 192:19 spelled 188:6 292:4 301:5 spend 134:1 177:3 263:3 281:8 392:16 spent 6:14 sphere 272:14 spices 255:10 spirit 35:13 58:6,9 77:6 387:7 spirulina 150:9,16 150:19 151:7,20 152:6,8,11,14,18 spoiled 115:18 spoke 206:14 spoken 384:16 spray 32:5 177:8 252:4,9 260:11 262:4 263:7 264:22 266:12 267:10 270:8 272:1 276:5,7,8 sprayed 225:16,17 238:20 258:8 265:2 spraying 32:7 276:9 sprays 235:2 spread 212:7 224:9 225:21 235:4 238:6 367:11 spring 4:5 17:4,8 246:4 279:18 springing 17:13 spun 271:2 spur 123:5 stabilizers 286:9 staff 2:10 24:1 35:2 35:5,13,16 66:4 68:5 69:2,22 201:6 stage 21:20 237:4 335:1 stages 271:5 308:22 stagnant 314:1 stagnation 98:15 | stainless 302:18 stake 79:4 staked 265:20 stakeholder 75:4 128:21 stakeholders 88:16 129:8 242:9 290:9 321:13 335:19 343:4 stand 16:16 260:1 263:13 334:3,8 357:17 358:22 361:1 396:21 standard 78:6 105:8 112:9 163:2 163:9 174:12,13 175:6 220:9,14,18 222:11 229:7 230:4 231:11,19 274:18 317:13 321:12 325:4,14 325:16 341:5 345:7 346:3,10 347:1 349:7 353:8 353:16 359:6 362:6 365:9 382:3 385:9,21 390:11 standards 1:5,10 2:16,18 9:8,11 14:4,7,13,17 15:2 31:13 32:18 33:15 36:3 38:12,14 48:14 51:1,7 53:19 55:9 57:13 69:17 81:10 95:7 96:4 98:8 106:8 106:22 116:2 128:11 140:7 178:21 203:11 206:15 229:4 313:21 314:1 317:6,9,10 320:16 322:1 340:6,18 341:8 344:11 346:1 347:7 348:10 349:14 351:3 353:18 | 358:19 359:19 361:14 388:4,5 standing 265:18 standpoint 159:16 stands 17:21 23:4 135:9 174:13 190:7 249:12 start 5:13 25:22 31:15 63:19 118:19 160:8 164:6,8,8 165:2 171:12 190:19 192:11 195:21 212:4 221:16 225:12,21 226:8 226:10 227:2 230:13 236:18 249:5 272:8 281:13 289:21 292:12 304:4 306:19 320:13 346:4 348:8 352:9 356:1 362:11 366:17 367:17,21 started 62:2 124:4 138:8 165:1 183:4 205:5 264:2 266:21 369:15 starting 9:19 52:7 192:7 209:13 233:14 249:1 272:13 318:5 392:19 393:4,6 starts 96:3 330:9 330:10 state 5:21 11:17 32:3 54:7 93:5 221:10,11 232:6 232:16 239:3 244:3,13,14 268:20 269:3,12 281:5 343:13 379:13 381:16 stated 120:10 171:19 190:2 288:17 332:4 statement 84:7,19 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 85:4,5 123:4 155:13 253:18 310:15 354:3 360:17 361:1 statements 80:12 133:14 239:17 states 1:1 67:8 100:18 107:5 108:11 116:5 128:5 152:9 161:7 161:11 197:6 212:16 214:7 333:1 339:1 340:19 356:22 378:15,18 391:11 state-by-state 332:21 stating 85:2 165:14 373:19 stations 264:12 statistically 208:6 211:15 341:16 346:7 statistics 111:13 386:10 stats 130:10 status 75:22 92:18 100:10 151:7 statute 157:21 387:3 388:4 staunch 265:18 stay 4:8 20:17 25:9 35:21 54:6 73:11 115:5 129:3 247:1 251:15 252:22 269:10 323:11 363:10 365:19 staying 259:4 steel 302:16,19 stems 285:9 step 216:18 342:4 359:16 stepped 361:6 steps 59:10,22 82:15 87:20 254:16 293:3,4 step-by-step 301:3 | step-down 88:20 Steve 71:5 74:1,4 78:12,15 120:21 172:19 243:21 253:5,6 256:21,22 Steven 178:11,12 Stewart 178:13 stick 394:3 stock 42:11 343:14 Stoke 277:6,6,6 Stone 1:12,15 3:3 4:3 10:7,8 13:9 16:4 17:22 21:14 24:17 25:2,6 65:13,21 70:19 73:6,20 74:1 78:10 83:4 84:1 85:10 91:2 92:10 93:9 94:9,13 99:1 100:3 101:18 102:7 104:7 105:9 105:13 109:7 110:5 111:15 112:14 114:5 115:13 120:20 121:4 122:21 127:15 128:16 132:11 136:8,12 136:19 138:14 141:19 142:15 143:15,18 147:17 147:21 149:10 150:4 153:4,8 154:1 155:7 156:3 159:2 160:3 163:18 165:5 166:2,5 168:3 172:18 176:13 178:10 182:5 184:4 188:10 189:19 193:16 195:5 199:6 202:5 204:13,16 205:3 205:19 210:11 211:17 214:22 217:20 222:13 224:14 228:2 | 230:16,19 235:15 236:9 237:6 242:5 243:11,20 247:8 249:9 250:22 253:1,4 256:20 261:6 263:14 267:17 273:8 276:21 277:3 280:13 282:3,7 283:14 301:22 303:21 307:2 309:19 314:9 315:11,21 316:21 319:8,11,20 320:4 320:7,11 337:9 342:10 345:10 350:2,20 352:17 355:13,16 360:3 361:2,5 365:4 369:19 372:20 376:13,20 377:2 381:9 386:1 391:7 395:7,10,16 stop 118:14 226:20 362:17 stoplight 20:21 stopped 139:18 150:22 391:15 storage 256:15 store 250:3,7 390:15 stores 139:4 143:4 143:5,7 stories 124:19,21 story 124:17,18 272:9 387:22 straight 245:6 strained 35:10 strategically 332:7 strategies 148:4 195:3 strategy 110:2 152:21 Strauss 160:7,21 161:1,3 164:3,17 164:19 165:6,13 165:21 166:14 | 167:22 384:15 Strawberries 6:21 stream 366:6 380:7 streamline 54:14 299:20 streamlining 54:12 56:19 street 244:4 streets 393:6 strengthen 147:14 320:20 strengthening 333:14 strep 169:20 streptomycin 128:8 223:3 229:18 235:19 strict 23:7 53:1 164:22 371:6,7,20 372:2 stricter 76:18 strictly 287:16 stringent 218:14 strip 165:1 stripes 174:3 strong 78:6 80:19 85:7 98:8 169:7 186:21 191:14 200:4,15 361:15 395:1 strongly 89:14 95:14 180:16 198:5 256:7 260:17 362:19 struck 81:3 structure 218:20 struggling 274:14 303:13 stuck 164:9 studies 156:17 212:14 213:4 224:13 368:4,13 368:22 379:3,8 study 45:8 162:2 166:15,16 248:1 248:12 255:3,7 256:9 331:3 | 382:17 stuff 351:6 378:1 380:18 382:5 383:10,11 384:21 385:18 389:7 subcategory 326:14 subcommittee 3:9 3:13,16,20 6:5,6,7 6:8,12,13 9:15,15 12:7 14:15 15:5 22:21,21 40:2,4 74:12 75:18 77:11 80:20 88:18 144:10,18 146:9 146:12 170:5 172:2 239:6 286:20 295:17 299:1 300:20 301:3,14,20 303:17 305:12 309:6,6 319:17 320:15,22 323:17 329:4 330:22 331:5,12,22 332:1 373:13 375:2 377:14 Subcommittees 7:5 subcommittee's 86:21 89:12 145:16 301:12 subject 151:18 163:10 198:14 219:5 258:5,17 276:1,2 330:18 336:7 subjects 333:11 submissions 362:4 submit 40:17 144:4 243:7 290:14 306:2 360:17 submitted 74:7 97:20 108:3 138:21 169:3 253:17 292:14,17 subordinate 379:12 subpar 220:21 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------|---------------------------|--------------------------|----------------------------|----------------------------|
| subsequent 75:7 | suggested 120:8 | 349:11 366:6 | 205:7 215:15 | 385:7 390:10 |
| subset 290:9 | 158:20 194:9 | 390:9 | 225:5 243:9 | 392:1 |
| subsidies 259:14 | 299:14 343:22 | support 31:17 | 279:19 282:21 | symbolic 355:1 |
| subsidizing 73:1 | suggesting 112:17 | 33:12 35:12 49:19 | 283:2 295:11,13 | Syngenta's 384:20 |
| substance 62:10 | 324:20 | 50:6 56:20 57:2 | 315:8 317:7 | synthesize 37:13 |
| 72:4 119:21 | suggestion 101:10 | 73:2 77:19 86:21 | 319:12 345:16 | synthesizing 37:16 |
| 176:20 255:12 | 101:11 | 90:13 95:15 96:16 | 352:10 381:18 | synthetic 36:10 |
| 256:18 286:22 | suggestions 96:9 | 96:18 97:8 100:11 | 395:9 | 70:16 140:22 |
| 298:15 299:7,10 | 163:21 224:20 | 116:11 118:12 | surfaces 288:9 | 142:10 147:2 |
| 299:11 315:13 | 324:15 325:10 | 120:6 140:16 | surrounding 92:14 | 173:21 191:8,15 |
| substances 42:17 | suggests 213:9 | 141:5 145:22 | 116:16 | 192:13 240:5 |
| 47:5,10 48:5 | 329:10 334:1 | 146:12 155:13 | surveillance 313:5 | 253:13 255:12 |
| 90:14,15 108:21 | Sulfuric 235:8 | 165:20 174:1 | survey 55:16 130:5 | 256:9 293:9 |
| 113:7 120:11 | summaries 74:9 | 179:1 180:7,15 | 140:11 141:22 | 299:11 302:19 |
| 145:4 285:11,13 | summarize 144:6 | 184:13 196:15 | 142:1 207:21 | 309:7 322:3 323:6 |
| 286:16 287:18 | 278:14 285:1 | 234:20 239:8 | 211:10,11 215:8 | 383:11 390:20 |
| 288:4,7,8 306:6 | 335:10 | 240:13 287:13 | 215:11,16 217:22 | synthetics 139:2,7 |
| 364:12 370:16 | summarizes 45:11 | 291:10 299:19 | 218:5,19 219:12 | 191:2,6 323:11 |
| substantiated | summary 37:17 | 322:22 326:7 | 242:10 341:14 | synthetic/non-sy... |
| 312:4 | 63:20 116:8 | 329:18 332:19,22 | 345:13 352:14 | 43:22 298:18 |
| substitute 256:14 | 279:20 304:20 | 342:18 344:6 | 382:17 389:15,17 | 309:3 |
| 257:15 259:5 | 323:21 324:5 | 361:16 372:3,5 | surveyed 142:4 | syrup 8:21 |
| 263:11 | 328:2 | supported 87:21 | surveys 248:10 | system 46:4 57:3 |
| substituting 255:19 | summertime 250:5 | 149:18 300:5 | 389:10,11 | 59:7,18,19 61:18 |
| sub-ingredients | sunset 50:13 81:15 | 313:22 | susceptible 105:1,2 | 61:19,20,22 75:11 |
| 378:11 | 88:9 97:10 101:13 | supporting 299:15 | 195:2 197:16 | 79:6,18 80:3 89:6 |
| succeed 119:10 | 101:13 108:19 | supportive 144:10 | suspect 132:20 | 111:11 146:15 |
| success 13:20 50:7 | 135:22 199:22 | 294:13 | 149:7 | 147:5 178:18 |
| 79:16 124:18 | 208:20 209:6,19 | supports 40:18 | sustainability | 188:1 191:10 |
| 134:19 | 214:17 246:19 | 74:13 75:2 77:10 | 79:18 80:4 176:20 | 193:2 200:10 |
| successful 64:20 | 248:17 249:2,7 | 88:17 89:14 118:9 | 206:6 210:3 | 214:17 221:7 |
| 118:21 | sunsets 109:4 | 145:15 231:20 | 216:10,15 | 241:11 255:15 |
| successfully 108:11 | sunsetted 50:18 | 232:1 237:20 | sustainable 6:16,17 | 271:4 321:11 |
| 238:12 | supercede 379:16 | 242:2 299:21 | 35:12 174:17 | 347:6,11 369:4 |
| suddenly 17:18 | supplement 124:2 | 376:8 | 178:17,20 233:12 | 374:8,8,12 380:12 |
| suffer 8:5 | 373:16 | supposed 38:7,8 | swarm 17:16 | 380:16,21 |
| suffice 335:11 | supplemental | 60:12 81:15 | swatch 248:8 | systems 31:19 |
| sufficient 48:19 | 305:8 | 214:19 | Sweden 241:1 | 79:22 119:7 148:1 |
| 60:7 296:16 | supplements 43:3 | sure 16:21 23:19 | sweeps 243:9 | 148:10,14 151:19 |
| 333:20 | 311:19,22 313:1 | 25:8 29:18 30:22 | sweet 175:9 | 174:17 181:18 |
| sugar 240:1,2,4,7,9 | supplied 156:9 | 31:3,3 33:5,16 | Swider 85:16 | 186:6 190:14 |
| 240:17,20 241:2 | suppliers 166:18 | 52:16 65:3 78:13 | swing 247:11 | 191:22 192:6,8,10 |
| 384:20 385:3 | supply 34:7 46:6 | 92:22 105:14 | Swiss 272:21 | 194:11 231:19 |
| suggest 74:18 75:9 | 76:5,14 82:8 | 108:16 121:10 | switch 370:9 | 323:1 328:4 |
| 144:12 163:4 | 154:12 162:13 | 129:10 155:16 | switched 67:18 | systems-based |
| 285:22 326:15 | 164:13 184:11 | 162:17,18 170:1 | Switzerland 335:16 | 180:15,17,21 |
| 388:21 | 220:18 348:19 | 173:19 203:21 | symbol 382:19 | 191:17 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| S-E-S-S-I-O-N 205:1 | take-home 116:13 119:18 | team 14:13 41:6 253:17 256:6 | 260:12 | tested 89:8 164:21 166:20 167:1 168:1 257:20 259:6 262:12 263:10,12 339:2 347:10 |
| <hr/> T <hr/> | takings 201:14 | teams 25:12 | temporary 178:9 340:20 | testified 226:14 |
| table 3:1 5:16 23:22 147:15 228:9 279:6 281:21 385:1 388:13 | talk 15:17,17 23:15 31:8 52:1 71:8 124:20 128:3 131:9,13 143:13 149:12 157:14 161:20 169:1 206:9 208:10 247:18 284:14 327:6 338:8 386:16 389:20 | tears 30:13 | ten 34:1,2 52:21 208:4 219:19 291:6 299:14 318:12 342:2 369:2 | testifying 165:7 |
| tables 143:7 | talked 112:15 141:7 142:20 159:5 208:12 217:21 247:13 318:8 335:17 363:7 382:13 384:14 385:14 | technical 49:6,7 55:4 59:10,16 60:5,17 61:3,8,13 68:2 74:14 108:18 156:8,10 212:15 253:16 284:12 296:14,18,19 297:3 298:1,12 299:22 300:2,3,10 304:18 307:11 310:8,11,19 311:3 311:17 315:2,4,7 316:6,14,17 329:18 370:8 372:5 374:15,20 | tend 115:5 181:11 193:10 247:16 255:5 350:14 386:15 392:3 | testimony 91:10 217:8 330:16 331:16 370:5 |
| tactics 196:19 | talking 128:19 136:22 141:12 208:11 272:12 274:21,22 275:22 276:8 289:4 338:17 340:1 344:22 351:20 385:17 | techniques 43:5,6 110:3 119:14 322:14 | tended 294:12 | testing 44:18 45:1,3 45:8,13,14,18,20 45:21 88:5 103:4 103:5 161:15 163:8,22 164:5,15 164:15 166:17 167:3 246:14 325:6,13 327:18 328:1 346:21 347:6,8 348:6 349:13,16,19 362:14,16,20 |
| tag 279:8 | Tallahassee 12:2 | technological 76:1 | tenet 81:1 | tetracycline 80:17 84:6,12 87:1,9 89:2 96:15 102:11 102:13,15 103:20 104:12 105:5 107:22 114:9 128:7 140:21 141:1,15 145:10 154:14 155:19 156:11 169:5,18 213:22 223:3 229:19 234:18 235:18 236:13 237:12,16,19,22 238:18 244:7 245:2,9,12 246:19 251:8 253:10 258:19 259:22 262:1 265:13 350:6 359:8 364:22 372:15 |
| tags 281:8 | Tanzi 337:12 | technologies 37:2 106:10 107:8 239:12 | tens 34:12 | test 45:6,15 93:5,7 165:1 166:16 256:13 273:3 340:16 348:12 355:4 |
| take 4:19 10:5 19:3 35:14,21 41:13,18 56:8 64:2 83:14 87:15 113:9 115:9 115:14,16 117:12 120:17 126:20 129:14 130:7 136:20 141:17 149:14 172:8 197:13 205:4 225:20 227:10,11 232:20 235:3 243:4,5 244:4 246:18 256:12 275:9 282:10 283:7,8 285:3 288:14 295:17 296:5 303:16 307:7 318:1 324:21 331:1 342:4 347:21 349:22 351:10,13 381:10 | target 383:3 | technology 45:18 46:13 76:13 150:11 280:18 347:21 367:4 | terrestrial 288:3 | thank 4:11,15,15 |
| taken 58:12 88:13 107:13 131:3,4 155:5 288:7 327:13 369:4 371:4 | targeted 210:21 215:18 | tedious 281:10 | terms 33:13 38:14 39:1 40:6 50:11 51:1 58:21 60:5 127:8 129:20 149:13 167:11 182:15 213:1 215:22 222:15 226:12 268:7 273:15,18 287:15 328:4 334:2 335:14 338:13 340:13 341:7 343:3,7 344:4,12 346:4,10 374:22 378:3 387:13 | |
| takes 41:21 84:19 141:18 175:22 260:7 262:21 272:3,7,11,14 334:3,8 387:2 394:22 | tarnish 238:22 | teeth 354:20 | testament 32:14 | |
| | task 311:11 | tell 27:12 30:18 148:18 160:16 177:15 210:4 262:20 264:17 273:3 289:6 380:17 382:6,20 383:3,14 385:8 387:18 391:16 394:10,15,16 | | |
| | taste 306:21 | telling 187:22 226:18 242:20 264:21 267:8 | | |
| | tasted 250:2 | tells 26:15 | | |
| | tasting 306:20 | temperature 264:9 | | |
| | tasty 250:13 | temperatures | | |
| | Tatiani 78:16 85:11 | | | |
| | Taylor 1:22 3:17 11:22 12:1 320:12 331:19 337:7 | | | |
| | tea 318:10 | | | |
| | teaches 217:10 | | | |

| | | | | |
|-------------------|--------------------------|----------------------------|-------------------|---------------------------|
| 5:17,18 6:9 7:6 | 307:1,2 309:18,21 | 29:1 58:15 99:4 | 125:12,22 126:7 | 330:19,20 331:3,8 |
| 8:14 10:22 11:8 | 319:10 320:12,15 | 107:1 124:13 | 127:1,2,3,8,10,13 | 331:11,14,17 |
| 13:10 16:4,20 | 322:15 324:6,8 | 155:18 178:3 | 127:17 129:22 | 332:6,19 338:16 |
| 17:22 18:17 24:9 | 331:18,19,20 | 181:9 194:22 | 131:6,6,8,15 | 340:4 341:6 342:3 |
| 25:7,7,19 26:9 | 337:6,7 350:3 | 204:17 226:19 | 132:5,6 135:21 | 342:12,21 344:2,5 |
| 31:1 65:11,22 | 355:13 359:17 | 245:8 247:11 | 140:7 149:12 | 344:18,20 345:20 |
| 66:15 70:18,19,21 | 360:1,3 361:2,3,4 | 248:16 271:9 | 154:21 159:12 | 345:22 348:21 |
| 71:1,4 73:5,6,21 | 361:10 365:3,4 | 292:7,9 308:18 | 164:4,11,14,17 | 351:9,17 352:5,9 |
| 73:22 78:13 83:1 | 369:19 372:18,20 | 340:4 341:12 | 165:2 166:14,21 | 353:8,13 354:15 |
| 83:4,7 84:1 85:10 | 372:21 376:12,13 | 366:3 390:19 | 167:5,14,22 168:1 | 363:10,13,15 |
| 90:22 91:2,4 92:9 | 376:21,22 377:5 | 394:6 | 178:5 180:6,19 | 366:7,8,8,16,19 |
| 93:9,10 94:9,13 | 381:7,9,12 385:22 | things 14:20 31:10 | 182:1 183:22 | 368:18,19 377:22 |
| 95:1,1,3 98:22 | 386:1 390:19 | 31:12 32:6 36:21 | 186:2 187:7 188:1 | 381:13 383:9,12 |
| 99:1 105:10,11,17 | 391:6,9 395:7,13 | 41:21 50:9,10,11 | 188:17 189:6 | 384:13 389:9 |
| 109:7 115:13 | 395:14,16 396:19 | 55:5 56:13 57:20 | 191:13 193:12 | 394:5 396:3 |
| 120:19,20 122:19 | 397:4 | 60:2 62:18,22 | 194:3,10,18 196:9 | thinking 103:2 |
| 133:20 136:7,10 | thankless 278:9 | 63:13 64:3,4 | 200:2,22 201:10 | 121:1 201:15 |
| 136:15 138:11,15 | thanks 14:1 15:6 | 67:19 100:1,2 | 201:20 203:14 | 202:17 246:16 |
| 141:18,19 142:15 | 73:18 78:15 86:13 | 113:11 123:9 | 204:6 206:16 | 252:12 275:14 |
| 142:19 143:15,17 | 104:9 105:9 109:9 | 159:1,12,18 181:7 | 208:20 209:9 | 302:4 |
| 143:22 147:15,17 | 122:16,22 132:14 | 184:1 186:22 | 210:21 211:8 | thinks 385:14 |
| 149:9,11 150:4,7 | 136:8 147:19,22 | 187:7,11 193:5 | 212:10 213:15 | thinning 192:21 |
| 153:3,4,6,7,13 | 155:6,7 156:4 | 194:20 207:11 | 214:8 215:7 216:4 | third 93:15 106:3 |
| 154:1 160:21 | 160:3 166:7 | 209:4 212:10 | 216:9 218:4 | 232:5 275:2,3 |
| 163:17,18,20 | 178:20 182:5 | 214:12 216:12 | 219:17,22 220:7 | third-party 296:20 |
| 165:22 166:6 | 184:5 199:6,8 | 222:4 223:10,17 | 220:16,20 221:3 | 297:1 |
| 168:4 172:17,20 | 204:13 210:13 | 226:1 250:14 | 222:7 224:5 225:6 | thirty-five 208:3 |
| 172:21 176:12 | 225:5 249:10 | 251:11,21 259:15 | 226:13 227:1,8,17 | Thirty-one 34:11 |
| 178:10 182:3 | 261:6 273:9 282:2 | 268:10 271:10 | 227:21 230:14 | Thirty-seven 386:9 |
| 194:14 195:5 | 282:4,6 314:9 | 281:7,7,9 284:9 | 243:14 247:15 | thorough 256:13 |
| 196:1,6 199:5 | 319:6,9 337:10,18 | 291:11 294:3 | 248:6,8 249:6 | thoroughly 256:10 |
| 202:6,12 203:9 | 342:21 355:15 | 295:4,7,8 302:11 | 262:9 263:6 | 257:19 336:3 |
| 204:15,18 206:2,3 | 386:3,6 | 302:16 329:15,18 | 269:18 271:10 | thought 86:3 |
| 210:10,11 215:1 | theat 184:9 | 332:17 338:10 | 274:4,8,20 275:4 | 149:19 150:2 |
| 215:14 228:4 | thematic 124:16 | 342:7 345:4 | 275:13 276:10 | 197:22 198:11 |
| 230:16,18 231:3 | theme 31:8 | 382:14 390:10 | 281:21 282:7 | 201:8,17 235:17 |
| 235:14,15 237:6 | Theo 137:13,13 | 392:20 394:19 | 286:19 288:11 | 275:8 289:20 |
| 242:4 243:20 | theoretically | think 5:13 6:8 10:4 | 291:2,15,16 | 291:1 296:9 300:6 |
| 247:8,12 253:1,3 | 367:15 | 17:11 19:7,15,22 | 292:20 296:3 | 335:4 369:8 |
| 256:17,19,20,21 | theory 269:22 | 23:20 32:2 41:22 | 304:19 307:19 | 391:17 |
| 261:2,5,9,17 | Theresa 150:5,6 | 51:9 52:7 65:5,7 | 308:21 309:8 | thoughts 74:9 |
| 276:21 277:2,8,15 | 153:8,15 | 66:2 76:8 78:2 | 326:12,15,19 | 166:8 303:22 |
| 278:8 280:11,12 | thermostat 153:12 | 84:7 86:10 93:3 | 327:11,17,21,22 | 365:10 |
| 280:13 282:4 | Thicke 1:22 5:12 | 102:1 111:6 | 328:12,12,14,18 | thousand 207:3 |
| 284:8,17,18 | 12:20,21 163:20 | 113:13 115:5 | 328:20 329:2,3,5 | 210:20 211:14 |
| 288:12,13 295:20 | 164:14,18 237:3 | 116:17 121:10 | 329:7,8,9,19 | thousands 34:12 |
| 296:1 301:18 | thing 21:11 28:16 | 122:2,8 125:6,11 | 330:6,8,9,12,13 | 250:21,21 260:8 |

| | | | | |
|----------------------------|---------------------------|---------------------------|----------------------------|---------------------------|
| 263:3 383:6 | Tilth 306:19 310:3 | 345:5,19 346:1 | tolerate 363:16 | 299:15,17 |
| threat 148:11 | 313:13 314:20 | 349:22 351:10 | tolerated 99:20 | tough 21:19 135:17 |
| 161:20 185:8 | 380:17 | 353:19,22 355:20 | tomorrow 124:20 | 343:3,7 366:7 |
| 197:5 217:1 | time 4:8,16 5:11 | 364:21 367:8 | 125:7 128:2 | tougher 99:22 |
| 237:14 321:2 | 17:2 18:10,10 | 370:14 371:22 | 137:12 160:15 | tour 194:3 236:1 |
| threatens 146:3 | 20:10,13 24:6 | 372:6,19 381:6,7 | 195:12 217:13 | 274:1,3 275:2,3,7 |
| 240:10 | 25:15 27:21 38:19 | 381:11 382:2 | 230:21 306:17 | 275:8 |
| three 12:11 19:22 | 40:18 41:18 53:15 | 390:5,7 392:12 | 307:1 309:22 | Tower 1:11 |
| 43:19 72:6 85:16 | 71:13 77:3 85:2,3 | 396:6,14 | 310:4 396:6,10,13 | town 388:22 389:9 |
| 105:18,19 117:9 | 85:18 86:11 87:15 | timed 258:4 | 396:22 397:5 | 391:2 |
| 135:15 144:17 | 87:20 88:1 91:1 | timely 49:6 131:20 | tomorrow's 160:14 | toxic 31:19 32:11 |
| 151:20 169:4 | 97:1,7,11 101:3,7 | 185:6 196:3 | 195:9 | 80:14 171:7 |
| 216:21 236:13 | 101:10,13,15 | times 22:4 35:1 | tone 17:4,7 | 191:21 192:2,3 |
| 244:11 256:13 | 104:5 115:19 | 99:15 105:7 | tongue 381:10 | 235:8 240:5 |
| 274:3 279:6,9,11 | 117:10,16 118:11 | 132:22 180:13 | tonight 29:5 | 243:18 |
| 284:9 297:17 | 119:5 121:18 | 201:12 217:22 | tool 40:16,19,21 | toxicological |
| 299:3,6,10 336:15 | 126:17 127:21 | 229:2 252:16 | 50:3 128:11 | 173:15 |
| 392:16 | 134:4,5 136:21,22 | 260:10 262:4,16 | 259:21 260:15 | toxicology 72:9 |
| three-day 18:3 | 137:14 138:4 | 263:16 265:2,3 | 263:5 265:4 | TR 68:6 157:7 |
| threshold 74:16 | 140:4 145:18 | 289:5,16 292:22 | 366:10 | 240:3 290:10 |
| 162:6 163:5,21 | 146:8 155:21 | 347:10 382:4 | toolbox 128:12 | 293:18 298:5,7 |
| 164:11 298:2,3 | 157:15 160:15 | 392:16 | 194:19 370:14 | 299:1 300:19,21 |
| 300:1 345:8 | 163:13 164:7 | timing 66:19 78:11 | tooled 278:16 | 301:11 308:13 |
| 363:17,21 365:7 | 170:14 182:1,11 | 120:22 155:18 | tools 81:22 122:3 | 309:8 315:12,17 |
| 365:12,14,20 | 183:8 184:19 | today 17:11 27:7 | 146:2,10 173:10 | 316:1 372:8 |
| 366:1,6 372:7 | 186:17 195:16 | 28:20 116:5 | 173:13 179:7 | traces 255:5 |
| thresholds 164:6,9 | 198:20 199:1 | 160:14,22 169:5 | 186:16,17 188:6 | tracking 341:19 |
| 363:4 | 200:12 201:7 | 195:11 206:9 | 190:9 191:5 | Tracy 1:18 6:10 |
| thrilled 248:14 | 204:6,8,11 205:22 | 244:6 245:12 | 192:20 194:16 | 205:19 217:20 |
| thrive 178:17 241:8 | 209:1,18 213:11 | 246:15 248:5 | 200:8 204:3 | 237:7 243:21 |
| throws 204:7 | 214:21 221:3 | 249:11 250:18 | 339:14,22 362:8 | 244:10 247:9,9,13 |
| thrusts 17:19 | 222:7 224:10 | 253:9 257:9 | 366:17 370:13 | 249:10 253:2 |
| thuringiensis 112:3 | 226:14,16 229:14 | 260:14 282:5 | top 82:16 154:2 | Tracy's 205:18 |
| Thursday 22:18 | 231:8 244:4 | 283:1 284:10 | 189:3 191:5 | trade 47:21 51:18 |
| 25:9 73:10 | 245:10,11,20 | 301:21 304:17 | 341:21 355:10 | 116:3 133:1 135:7 |
| thyram 113:17 | 246:11,17 261:2 | 306:22 336:8,8 | 393:14 | 162:3 293:6 |
| tie 74:10 | 263:4,17 267:20 | 356:4,5 366:16 | topic 48:4 84:5 | 337:19,21 338:6,7 |
| tied 118:10 367:5,9 | 268:14 272:3,4,11 | 370:3,6 372:10 | 196:9 305:22 | 379:10,12,15,16 |
| ties 78:3 | 276:22 278:15 | 373:4 382:20 | 313:13 314:12 | 380:1 |
| tight 18:5 99:15 | 281:8 282:4,16 | 384:16 385:19 | 326:17 329:5 | trader 216:5 |
| 187:2,5 252:16 | 283:19 284:5 | 393:19 395:20 | 330:4,19 331:17 | 346:20 |
| 294:18 | 296:10 298:4 | 396:1,9,18 | 333:17 364:1 | traditional 239:15 |
| tighten 164:7 | 300:3,12 301:18 | told 26:18 81:14 | topics 59:6,13 86:6 | tragic 172:17 |
| tightening 361:16 | 302:9 304:3,8 | 124:18 312:10 | 116:7 296:13 | train 234:7 |
| tighter 100:2 | 305:3 306:16 | 391:11 | 396:8 | training 6:16 13:2 |
| tightly 283:20 | 308:15 311:7 | tolerance 127:19 | torch 80:9 | 44:20 49:21 50:2 |
| tillage 174:20,21 | 331:12 342:11 | 213:2,21 385:22 | total 11:14 151:2 | 59:1 78:1 279:3 |

| | | | | |
|----------------------------|----------------------------|---------------------------|----------------------------|----------------------------|
| 325:14 | 113:18,19 | 138:12,17 141:20 | 393:12 394:19 | 281:9 |
| trainings 234:13 | tree 44:1 77:9 | 141:20 142:19 | turn 5:6 25:18 | types 42:17 58:5 |
| transcript 24:12 | 110:10 111:12 | 143:16 | 73:13 284:5 296:4 | 62:16 67:19 76:4 |
| 25:1 | 124:17 141:1 | true 88:7 107:19 | turned 291:3,4 | 303:11,12 312:3 |
| transcripts 24:18 | 142:22 179:22 | 113:14 153:20 | 335:12 | 312:11 314:3 |
| transfer 156:21 | 196:13 224:19 | 199:14 227:19,22 | turning 114:22 | typical 72:3 273:19 |
| 223:22 238:7 | 225:2,4 257:13 | 245:3 249:2,3,6 | 118:21 | typically 103:3 |
| transferring 354:4 | 259:12 285:15 | 272:2 275:16 | Twelve 262:22 | 190:10 340:8 |
| 354:8 | 350:16,18 | 327:3,4 349:18 | twenty-five 83:17 | |
| transition 88:21 | trees 17:17 43:21 | 368:6 | twice 85:15 | <hr/> U <hr/> |
| 112:16 144:22 | 94:4,7 194:2,7,8 | truly 118:1 119:15 | two 9:20 24:8 25:12 | ulterior 333:6 |
| transitional 200:8 | 194:10 207:8 | 220:8 222:10 | 32:2,9 43:21 70:7 | ultimately 72:17 |
| transitioned 11:15 | 208:1 225:17 | 228:20 276:18 | 70:12 75:3 84:11 | 349:6 |
| transitioning 192:2 | 235:1 260:16 | 380:8 | 85:16 116:12 | unable 298:14 |
| translate 155:1 | 262:22 263:2,4 | trump 141:4 | 123:3 125:8 | unacceptable 360:1 |
| transmission | 274:18,19,19 | trust 8:12 185:19 | 133:14,16 135:14 | 373:9 374:21 |
| 158:13 | 275:18 | 247:22 266:9 | 137:10 143:12 | 375:7 |
| transparency | tremendous 101:1 | 321:21 341:17,22 | 146:20 150:13,15 | unanimous 299:12 |
| 40:20 80:6 208:19 | 103:4 132:20 | 374:11 382:21 | 150:21 151:3 | unanimously 20:12 |
| 221:22 241:5 | 163:13 184:13 | 385:4,6,8 392:12 | 160:11 161:14 | 345:21 |
| 376:11 380:12,14 | 252:1 259:2 | trusted 391:22 | 170:18 186:9,22 | unattainable 96:6 |
| 380:20 | tremendously | trustful 383:15 | 187:13 191:5,14 | uncertain 17:12 |
| transparent 75:6 | 389:2 | trusts 4:14 | 192:18 209:15 | 157:22 |
| 187:20 189:16 | trend 30:15 98:18 | truth 81:14 215:7 | 211:13 215:17 | uncertainty 158:7 |
| 208:8,12 221:7 | 98:21 | 254:14 394:5,9,10 | 232:4 244:20 | uncertified 313:4 |
| 222:9 227:7 | trends 329:17 | 394:16,16 | 245:10,20 246:2,2 | uncomfortable |
| 241:20 | trial 119:5 123:16 | truthfully 384:3 | 274:2 279:4,14 | 32:8 |
| transparently | 126:17 146:18 | try 53:21 60:18 | 280:8 282:15 | uncontaminated |
| 22:20 241:13 | trials 246:1,7,12 | 67:18 70:14 74:8 | 288:5 290:16 | 107:20 |
| transplants 302:10 | 262:13 263:12 | 121:3 132:13 | 299:6,8 308:22 | uncontrolled |
| 302:15 | 267:3 338:21 | 158:5 166:9 | 309:15 323:18 | 362:10 |
| transportation | tried 117:17 261:19 | 174:15 186:22 | 336:17 337:21 | undergoing 34:22 |
| 314:6 | 268:12 274:4 | 193:19 198:12 | 345:12 357:6 | underlying 299:19 |
| traps 285:16 | 335:10 382:3 | 251:4 279:22 | 358:10 359:9 | 345:1 |
| travel 18:16 | tries 61:7 | 317:14 332:9,12 | 370:7 373:7,15 | undermine 241:19 |
| traveling 15:22 | trigger 236:18 | 333:3 345:17 | 376:9 382:4 | undermined 222:2 |
| travesty 118:22 | trip 137:21 | trying 4:7 50:4 | 389:16 390:5 | undermining |
| 179:9 | trouble 144:20 | 54:3,6 62:20 84:2 | two-page 116:8 | 185:18 222:5 |
| trays 302:10,14 | troubling 235:5 | 92:1 99:6 115:11 | two-part 308:21,22 | understand 36:9 |
| treat 207:8 223:11 | TRs 68:5 90:4 | 153:11 228:5,6 | two-stroke 176:3 | 46:10 50:5 55:9 |
| 368:19 | 290:4 295:22 | 251:3 261:22 | two-year 185:2 | 55:10 71:21 |
| treated 113:15 | 296:11,21 304:19 | 268:1 276:1,12 | 186:15 198:1 | 102:17 119:9 |
| 114:3 240:9 | 305:2,5,6,13 | 281:20 293:8 | two-year-old | 129:10 157:22 |
| 251:17,18 | 314:17 315:8 | 307:9 318:13 | 279:17 | 177:5 182:13,20 |
| treating 364:12 | truck 281:16 | 320:1 329:6 332:6 | type 30:17 114:17 | 218:8,15 228:7 |
| treatment 210:7 | Trudy 105:15 | 333:6,10,13 | 182:16 210:20 | 229:17 235:5 |
| treatments 42:17 | 136:14 138:6,7,9 | 355:17 390:8 | 240:12 280:16 | 251:3,4 255:1 |

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 258:15,18 262:3 268:6 289:14 313:7 334:20 347:19 368:3 understanding 61:4 102:22 125:15 182:22 194:3,5 200:5 247:15 understands 69:8 understood 187:20 292:21,21 undertake 321:1 undertaking 171:10 313:8 underway 87:10 undue 65:1,4 unduly 358:13 unfair 39:15 73:4 313:3 UNFI 254:21 unfolds 397:3 unfortunate 127:1 135:17 271:9 unfortunately 82:7 101:3 268:11 291:7 uniform 279:3 uniformly 148:13 uninhibited 375:22 unintentional 167:5 364:19 union 106:21 109:18 112:1,9 115:8 183:14 208:15 217:7 248:2 338:12 340:2,6,18 350:22 unique 260:5 380:9 unit 106:7 united 1:1 19:15 107:5 108:11 128:5 152:8 161:7 161:11 197:6 214:7 332:1 339:1 universal 291:17 universally 332:19 | universe 100:8,9 university 10:19 12:1,4 159:14 221:10 unnecessary 88:15 95:12 298:1 300:12 305:3 unpackaged 51:13 unquestioned 252:2 untreated 113:22 114:2 unwilling 379:21 upcoming 233:4 359:8 update 3:6 31:9 49:14 58:13 62:3 62:20,20 326:20 updated 48:21 49:6 updates 59:7,19 61:19,21 uphold 89:7 170:21 185:3 234:4 upholding 64:14 upmost 257:13 upper 54:8 74:6 uptake 214:1 255:4 upticks 346:6 upwards 67:16 up-front 158:6 186:7 up-to-date 46:4 urge 119:4 144:6 163:11 171:11 198:5 239:2,16,18 241:3 244:6 246:16 356:18 370:22 urgency 133:7 135:13 179:21 182:2 185:6,9 186:11,20 225:3 364:4 urgent 196:1 urges 238:21 Urvashi 204:16 205:9 206:1,4 | 211:18 215:2 224:15 245:3 USA 152:14,18 359:22 usable 82:1 usage 72:3 264:4 265:13 270:9 USDA 13:3 14:5 23:7 28:1 31:10 33:7,12 34:2 49:18,19 50:1 67:8 106:22 107:6 107:16,17 112:11 114:3 117:7 152:9 152:9 169:11 185:14 290:10 305:4 322:17,19 329:13,20,22 330:2 343:12,16 352:14 354:18 357:13 358:19,22 376:4 380:2 384:5 385:6 390:13 391:17 USDA's 13:14 356:12,19 use 33:7 38:17,18 42:3 45:19 74:17 76:18 77:7 80:18 80:21 81:1,10 82:10,11 87:5,6 88:2,22 89:1 90:21 103:7 104:14,20 105:22 106:2 108:8 109:12 110:10 111:4 114:9,12 116:16 118:2,5,6 119:16,22 120:12 121:14 122:9,10 122:17 123:4,12 123:20 124:2 128:7 130:2 134:3 134:6,8,10,14 135:1 136:21 137:17 138:1 146:21 151:1,4 | 154:8,14,22 155:1 157:12 159:20,21 162:22 170:15 173:16 180:3,13 180:16 181:3 183:1,4,7,15 191:1,21 192:12 193:1,14 195:4 196:13,19 197:2 197:12 200:16 210:2,5,16 212:5 212:13,20 213:11 215:19 218:3 221:15 223:7,10 223:11,13 224:16 225:2,2 227:18 228:18 229:18,21 230:8 236:17 237:12 238:4,18 239:16 240:5 254:1 255:10,14 256:8 257:11 262:7,17 263:19 269:12 270:8 276:6 280:15,22 287:1 298:16 300:3 306:3 314:2 323:4 338:11 339:4,15,22 340:8 341:3 345:7 349:15 350:12 352:7 362:2,14 366:10 370:11,13 391:14 useful 300:10 user 66:10 167:19 uses 238:4 297:5,5 297:6 usual 10:4 31:7 usually 76:21 266:18 288:22 utilize 199:19 utilizing 314:4 utmost 322:11 U.S 32:21 34:6,11 73:2 77:9 98:13 107:11 109:10 | 111:3 231:22 240:20 241:3 254:11 338:7,13 339:12,18 350:19 365:10 <hr/> V <hr/> vacation 15:20 vaccine 8:20 12:17 76:11,18 vaccines 12:18 14:10 76:15,19 165:7,11,12,15 179:5,8,14,15,18 validate 117:14 validated 116:20 Vallaeyes 360:11 valley 175:19 257:6 257:10 264:12 267:16 356:8 377:8 valuable 19:8,16 291:21 373:17 value 5:5 18:18 234:2 valued 231:21 values 79:8 142:13 387:11 variability 58:20 149:2 273:15 variable 257:20 variables 348:17 variances 340:20 variation 129:6 190:9 varies 316:4 varietal 249:20 varieties 110:2 193:4,7,14 195:2 197:16 238:19 249:15 259:12 260:21 271:6,7,20 271:20 272:13,20 273:2 variety 42:15 221:14 302:17 various 33:12 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-----------------------------|----------------------------|---------------------------|---------------------------|-------------------------|
| 38:15 39:19 53:20 | vice 11:19 12:5 | 386:13 | 283:20 284:2 | 395:11 |
| 58:5 64:17 128:21 | 150:11 337:20 | | 289:20 295:6 | water 8:9 168:14 |
| 149:3,3 159:12 | victory 100:20 | W | 302:1,19,21 306:1 | 175:9 211:5 |
| 186:6 189:4 190:9 | video 26:7 31:4 | Wachspress 160:12 | 306:16 322:22 | 225:10 231:14 |
| 222:17 224:20 | view 43:9 157:20 | 205:15 | 324:21 341:12 | 234:17 288:9 |
| 312:5 | 220:1 222:6 | wait 137:14 179:16 | 345:3,6 346:9 | 313:19 317:5,11 |
| vectors 264:8 | viewed 148:5 | 262:16 366:14 | 347:14 349:2,3,4 | 318:17,21 388:7 |
| vegetable 175:20 | 242:21 298:9 | walk 92:1 142:22 | 349:5 351:14,15 | Watsonville 6:22 |
| 352:8 | viewpoint 119:15 | 281:13 284:20 | 352:10 369:5 | 7:8 231:3 |
| vehicle 29:2 | views 19:9 106:9 | 296:8 | 370:5 382:14 | way 16:5 21:15 |
| vein 21:7,16 280:14 | 141:10 166:10 | walked 123:18 | 387:9 388:12 | 26:20 28:19 38:5 |
| Vela 55:17 | vineyard 175:11 | Walker 1:23 3:5 | 389:4,8 390:22 | 52:18 56:9 57:7 |
| verbally 317:3 | 177:9 | 10:13,14 24:9,21 | 391:8 392:9 | 57:17 64:6 66:7 |
| verge 323:12 | violated 201:11 | 71:5 74:1,3,4 | 393:11 394:12,13 | 66:10 82:13 83:15 |
| verification 59:3 | violations 57:6,7 | 101:19 141:21 | wanted 20:11 23:11 | 83:21 102:18 |
| 78:8 161:19,22 | 58:5 64:4 373:11 | 242:7,13 345:11 | 47:1 154:4 195:21 | 103:2 106:19 |
| 162:20 163:3,8 | violently 294:11 | walk-around | 195:22 207:5 | 124:6 142:8 |
| 164:5 166:17 | viral 258:7 | 279:16 | 215:17 338:10 | 156:21 158:2 |
| 278:5,17,18 | Virginia 94:17 | want 4:9,11 13:16 | 348:2 369:7 | 163:14 168:2 |
| verified 33:6 42:18 | vis 346:1 | 15:13 16:11,17,19 | wanting 332:2 | 174:14 183:18 |
| 164:21 168:1 | visibility 332:9 | 18:9,10,17 19:10 | 382:18 | 192:12 194:6,12 |
| verifies 33:14 | visit 123:16 168:18 | 20:8 21:10 22:19 | wants 69:13 342:8 | 196:7 202:6 |
| 147:6 | 189:17 278:13 | 25:8 30:21 54:12 | 388:12,14 | 218:20 220:11,12 |
| verify 36:14 51:18 | visited 123:17 | 54:13 56:15,22 | warm 153:12 | 221:16,17 222:10 |
| 63:6 64:6 66:5 | visiting 261:9 | 63:11 70:4,15 | warned 238:8 | 228:19 233:8 |
| 75:22 137:20 | visits 267:20 | 79:8 81:17 93:20 | warning 178:7 | 234:20 247:2 |
| 165:10,15 166:17 | visual 280:19 | 115:18,19 118:1 | 238:11 282:8 | 249:5 252:12 |
| 179:8 278:14 | vitamins 42:22 | 129:9 134:1,3 | warns 237:15 | 268:1 269:15 |
| 281:14 314:15 | voice 24:14 274:17 | 136:21 137:10 | warranted 241:15 | 270:6 281:10 |
| 325:16 | 323:15 332:4 | 138:21 139:13 | 372:8 | 303:7 304:10 |
| verifying 52:17 | 377:10 | 141:1 142:9,10 | washed 252:6 | 312:18,20 313:2 |
| 63:22 76:14,15 | voiced 236:17 | 149:21 156:5 | Washington 7:22 | 314:19 318:19 |
| Vermont 8:17 | voices 98:4 | 162:17,18,18 | 11:16,17 13:3 | 334:4 339:12 |
| 17:10 | volume 240:8 | 163:11 169:12,14 | 32:2 130:5,12 | 342:11 350:14 |
| vernacular 249:5 | 270:8 272:1 | 178:20 179:1 | 221:10,11 244:13 | 352:22 355:7 |
| version 345:18 | voluntarily 359:16 | 181:12,13,15 | 268:20,22 | 362:17 363:9,18 |
| versus 39:2 62:18 | voluntary 379:20 | 182:3 191:16 | wasn't 167:1 | 364:14 365:1 |
| 81:5 121:8 131:1 | volunteered 370:4 | 192:16 193:20 | 199:14 261:11 | 368:10 372:6 |
| 131:5 235:1 | volunteers 376:4 | 202:3,14 204:2 | 291:20 306:1 | 378:20 380:22 |
| 251:13 281:20 | vote 24:14,15 68:14 | 205:5,6 208:16 | 319:13 395:20 | 384:3 |
| 338:12 339:6 | 294:4 357:2 358:2 | 212:10 216:20 | wasted 381:7 | ways 23:18 55:19 |
| 352:3 | 358:3,8,15,22 | 218:16 219:1 | wastewater 240:8 | 73:3 83:19 188:13 |
| vertically 270:19 | 359:1,9,17 | 222:1 223:11 | wasting 381:5 | 214:4 238:12 |
| viability 77:8 146:3 | voted 200:13 393:7 | 227:6,10,16 230:9 | watch 83:12 86:12 | 327:16 334:16 |
| viable 92:3 101:5 | voting 19:11 24:13 | 262:11 272:16 | 211:5 262:16 | 336:17 354:10,14 |
| 240:14 353:22 | 25:1 39:22 320:1 | 273:7 278:8 | 263:2 | 354:15 356:12 |
| vibrant 234:22 | 323:14 357:10 | 282:20 283:7,17 | watching 262:19 | 362:1 380:14 |

| | | | | |
|---------------------------|----------------------------|-------------------------|----------------------------|--------------------------|
| 389:16 | well-trained 279:2 | 135:18 137:4,16 | 289:10 293:12 | wise 74:17 249:20 |
| weakens 375:15 | well-versed 275:5 | 138:5,18 139:10 | 300:15 317:18 | 300:3 |
| wealthy 259:18 | Wendy 1:19 11:1 | 156:6,7 160:13 | 321:7 330:21 | wish 68:6 151:5 |
| wear 159:10 | went 19:21 22:10 | 185:8 186:19 | 336:1 341:1,19 | 152:13 253:22 |
| wearing 105:18 | 98:14 108:22 | 195:8,12 199:3 | 345:19 346:12 | 276:15 380:4 |
| 159:4 | 124:10,13 136:17 | 208:10 209:9,16 | 390:17 393:16 | wishes 364:2 |
| weary 208:20 | 166:19 204:21 | 214:10 216:5 | wheels 177:8 | withdrawal 115:3 |
| weather 94:5 105:3 | 261:14 283:12 | 218:11 221:2,4 | where'd 144:9 | withdrawn 300:14 |
| 237:5 264:12 | 328:11 397:7 | 226:21 230:5,8 | white 17:14 37:2 | 300:15 305:15 |
| web 243:1 | weren't 20:20 32:3 | 231:3,6 234:14 | 386:18 | withheld 375:14 |
| webinars 61:5 | 165:7 205:8 | 242:18 247:5 | whoa 189:7 | 381:3 |
| 233:16 | west 93:3 110:9 | 249:1 252:14,15 | wholesale 248:7 | withhold 379:7 |
| website 49:12 | 161:9 175:10 | 252:16,17,18 | 258:13 271:12,13 | Wolf 287:12 |
| 65:17 156:17 | 377:9 | 253:7 269:3,19 | wholesome 248:15 | women 386:19 |
| 168:18 242:18 | western 100:18 | 270:4,18,22,22 | 250:13 | wonder 165:8 |
| 243:1 | 161:7 | 271:12 274:21,21 | wholistic 79:22 | 184:19 |
| weed 173:8,17 | wetlands 231:14 | 279:18 282:9,13 | widdled 83:17 | wondered 302:8 |
| 174:5 176:3,7 | we'll 5:16 20:16 | 282:15 283:15,15 | wide 149:1 | 319:3 |
| 286:17 | 24:10,14 30:21 | 284:9 293:7 296:3 | widely 262:12 | wonderful 244:14 |
| weeds 174:4 175:10 | 44:10 49:10 50:14 | 301:2 306:19 | 339:6 | 250:7,14 391:9 |
| 175:16 176:2,9 | 59:6 61:3 85:13 | 318:13 324:2 | widespread 116:22 | wondering 110:14 |
| week 58:22 78:15 | 85:20 118:5,12 | 330:13 331:6 | wife 10:10 | 114:10 123:7 |
| 94:10 160:11 | 132:21 195:15 | 333:9,13 334:9 | Wilcox 160:16 | 133:1 224:21 |
| 211:3 256:19 | 202:7,8 204:18 | 336:9,16,21 337:4 | 205:16 | 273:14 365:6,15 |
| weekly 15:18,19 | 205:17,21 234:9 | 337:13 338:17 | wild 231:2,4 232:4 | 368:12 |
| weeks 18:8 274:4 | 283:1,4,10,21 | 339:22 347:13,16 | 233:11 270:14 | wood 246:9 268:21 |
| 336:15 | 288:14 304:7 | 348:2,12 351:12 | wildlife 231:15 | woodlands 231:15 |
| weigh 251:20 | 306:22 319:12,14 | 352:15 354:13,22 | 232:17 | woodland-raised |
| weighed 344:20 | 319:22 337:14 | 355:18 365:2 | Willamette 356:8 | 27:14 |
| Weinmann 160:15 | 381:10 396:9 | 387:17 396:15 | 377:8 | Woods 137:13 |
| 160:15 205:15 | we're 4:7 8:21 19:9 | we've 18:2 31:12 | willful 57:5 | word 17:3 65:8 |
| weird 28:22 | 20:9,14,15,16 | 36:22 49:9 50:3,9 | Williams 304:12 | 74:11 78:4 210:19 |
| welcome 16:3 | 21:19,20,22 23:6 | 51:5 52:6,22 56:3 | 310:2,3 314:17 | 312:16 |
| 25:13 31:6 229:5 | 25:21 28:15 30:19 | 56:6 57:16,20 | 315:16 316:4,16 | wording 145:8 |
| 244:2 273:11 | 37:15 43:18 48:16 | 58:20 70:21 74:7 | 317:7 319:10 | 294:17 |
| 277:1 | 49:1 50:19 51:2 | 85:18 98:16 100:1 | willing 20:16 122:9 | words 69:2 148:6 |
| welcomed 196:3 | 51:15,20 52:16 | 121:15,21 122:22 | 369:17 392:15 | 237:2 239:7 |
| welcoming 23:18 | 54:3,5,15 58:15 | 128:14 139:15 | willy 104:21 | 326:10 333:22 |
| 66:11 | 59:14,17 64:10 | 169:2 172:22 | Wilson 71:2,3,6,6 | word-by-word |
| welfare 32:16 | 66:16 67:5 68:19 | 178:6 204:10,11 | 73:18,22 | 333:22 |
| 69:17 278:20 | 74:5 80:15 84:2 | 206:13,22 208:5 | wind 246:18 | work 4:14 5:16,22 |
| welfare-approved | 104:4 107:1 | 211:13 224:16,20 | wine 11:13 274:16 | 5:22 6:20 7:10 |
| 216:13 | 115:14 117:9 | 249:13 252:14 | wing 29:13 | 8:2 9:9 11:4 |
| well-meaning | 119:14 121:1 | 254:19 260:9 | wings 380:19 | 13:11,19,22 14:7 |
| 258:3 | 123:19 125:5,19 | 262:15 265:2 | winter 257:8 | 14:8,18 15:1,4 |
| well-rounded | 126:13 132:18 | 267:5,6 268:12 | win/win 125:11 | 16:10,12,19 18:1 |
| 311:1 | 134:19,21 135:13 | 270:5,11 271:9,21 | Wisconsin 11:6 | 20:15,16,17 22:17 |

| | | | | |
|--------------------------|---------------------------|---------------------------|---------------------------|----------------------------|
| 22:20 23:8,21 | 61:17 65:6 66:12 | 144:4,7 145:9 | 135:14,15,15 | zero 127:19 236:16 |
| 24:2,5 32:14 34:8 | 76:11 78:20 80:3 | 148:2 165:19 | 143:12 161:14 | 328:8 385:21 |
| 35:15,17,19 38:9 | 118:20 124:11 | 172:21 190:2 | 170:18,19 174:8 | zinc 242:3 243:13 |
| 41:15 46:20 48:1 | 178:21 180:1 | 217:8 253:18 | 175:14 186:9 | ziram 113:17 |
| 48:4 52:10 53:21 | 186:9 193:5,6,12 | 256:12 266:5,12 | 187:13 206:7,13 | Zirkle 11:11 |
| 56:4 59:2,4 66:11 | 193:13 217:6 | 300:11 306:12 | 214:14 219:6 | zones 348:18 |
| 71:12 74:16 77:21 | 233:1 234:10 | 317:4 327:9 | 244:16,20 245:10 | |
| 82:17 83:2 85:14 | 246:3 254:20 | 345:18 362:4 | 245:20 246:2,2 | <hr/> \$ <hr/> |
| 85:20 86:9 88:11 | 257:18 273:6 | 364:9 | 247:19 251:16 | \$1 35:3 |
| 91:1 95:17 100:1 | 328:15,19 329:6 | wrong 141:6 236:7 | 256:13 260:7,9 | \$100 231:21 |
| 102:16 104:10 | 365:22 390:4 | wrote 68:7 202:20 | 262:21 263:1,17 | |
| 118:4 122:12,15 | workload 35:19 | Wyard 115:22 | 265:3 267:7 | <hr/> 0 <hr/> |
| 128:22 132:9 | works 9:11 22:21 | 116:1 121:3,10 | 268:14 272:7,14 | 0.1 166:22 |
| 159:14 165:19 | 22:22 220:19 | 122:19 123:15 | 272:15 276:9 | 0.35 213:2 |
| 173:5 179:12 | 233:18 246:9 | 126:7 128:1 129:9 | 278:15 359:19 | 0.5 363:4 365:14 |
| 192:12,22 210:20 | 269:15 | 129:19 131:6 | 365:22 366:14 | 367:1 |
| 244:16 247:5 | world 66:2 95:8 | 133:20 135:16 | 369:3,8,9 385:20 | 0.9 162:7 363:1,3 |
| 249:5 264:16 | 106:7 107:2,12 | 136:10 | 390:5 | 365:8,19 384:9 |
| 266:10 279:19 | 108:5 120:18 | | year's 358:2 | 394:4 |
| 281:9 282:18 | 178:18 179:11 | <hr/> X <hr/> | year-round 40:16 | 08 339:2 352:13 |
| 287:13 290:5 | 191:19 237:16 | X 248:22 315:12 | 336:13 | |
| 291:21 294:2 | 314:2 332:12 | | yeast 338:19 | <hr/> 1 <hr/> |
| 295:18 299:15 | world's 275:21 | <hr/> Y <hr/> | 339:15 | 1 26:9,13,17 27:1,4 |
| 300:1 307:20 | worry 383:16 | yacht 30:8 | Yelena 160:6,7 | 27:10 28:1,7,15 |
| 309:14,16 310:14 | worse 170:2 202:14 | year 9:19 15:12,13 | yellow 21:1,3 | 28:18,21 29:19 |
| 337:5 342:5,17,18 | 387:22 | 17:13 21:21 23:17 | yesterday 31:20 | 30:13 31:1 |
| 348:14,20 353:19 | worth 176:11 232:4 | 32:22 34:14,19,20 | 59:17 91:22 | 1st 45:4 |
| 378:15 386:7,21 | 262:9 269:7 | 35:9 37:18 40:18 | 196:10 211:4 | 1,000 255:6 |
| 389:1,5 393:14 | 328:14 | 41:20 45:7 46:3 | 221:9 236:1 | 1,500 74:5 142:5 |
| workable 149:12 | wouldn't 115:15,16 | 50:16,19 51:5,8 | 261:10 267:19 | 1:00 204:18 |
| 150:3 | 192:8 315:19 | 62:3 67:9 71:12 | 273:10,13,18 | 1:05 204:22 205:2 |
| worked 13:2 14:10 | 349:2,4,12,18 | 93:18,19 114:16 | yields 232:11 | 10,000 50:1 67:16 |
| 15:16 18:6 19:19 | 351:13 | 115:9 122:6 126:3 | yogurt 161:5,6 | 10:18 136:17 |
| 86:4 148:17 | wrap 114:6 132:12 | 126:6,8 127:12,14 | young 31:21 32:1,6 | 10:30 136:13,15,18 |
| 188:12 200:21 | 193:17,19 228:3 | 135:14 146:21 | 32:9,22 | 100-percent 19:13 |
| 201:1 218:18 | wraps 285:15 | 173:6 209:15,16 | | 161:10 |
| 271:16 290:8 | wrestle 201:21 | 221:1,1,1,2 234:9 | <hr/> Z <hr/> | 101 49:21 |
| 349:1 388:19 | 353:22 | 236:15 245:22,22 | Zea 1:21 3:10 7:8 | 11 162:5 166:21 |
| worker 176:2 | wrestled 18:2 | 246:6,13 261:20 | 65:14 73:7,19 | 212:15 337:10 |
| workers 168:13 | write 227:12 281:4 | 261:22 262:14,15 | 149:10 159:2 | 11th 21:21 23:17 |
| working 7:21 8:20 | 281:6 | 274:10 275:18,19 | 175:17 247:11 | 11:50 204:21 |
| 12:18 14:11 15:6 | writing 239:19 | 340:12 341:3,4,15 | 248:11 282:8 | 12 34:20 202:7 |
| 15:15 19:6 32:3,4 | written 4:18,21 | 341:16 346:7 | 283:6 284:6 296:2 | 262:21 342:2 |
| 39:19 41:6,8 | 70:22 74:7 116:7 | 362:18,18 364:6 | 323:20 326:18 | 13 120:11 |
| 44:10 51:2,15 | 116:14 119:19 | years 6:14,15 7:1 | 331:19 337:7 | 133 34:4 |
| 52:6 55:15,16,21 | 120:2,8 133:18 | 34:1,2 52:21 53:9 | 342:13,21 360:4 | 14 129:13 |
| 57:16 59:14,17 | 138:20 142:16 | 58:22 70:7 72:7 | Zern 160:17 205:20 | 142 100:14 |
| | | 82:1 88:12 117:5 | | 15 93:1,11 138:1,2 |

| | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 206:7 207:13 244:16 15-minute 283:8 150 19:18 268:14 16 129:5 17 129:5 207:13,15 221:2 17,000 98:15 99:8 17,025 98:15 99:8 18 6:14 221:2 1957 127:17 1970s 195:21 1981 8:1 1989 259:10 1990 67:22 88:11 262:7 373:12 377:16 1992 177:19 1995 108:3 197:21 214:11 1997 198:2 | 47:12 140:11 162:3 212:16 352:14 2012 24:11,22 49:16 122:7 261:20 339:3,4 2013 1:8 34:19 50:1 50:14 98:11 339:10 2014 42:9 84:13 87:20 93:13 117:13 118:13,17 121:8,11,15,17 129:3,12,16,22 134:12 135:2 170:21 208:16 227:2,5 237:21 246:19 257:22 372:15 2015 126:9 2016 77:3 87:1 88:1 117:15 118:10,12 129:11,18 136:3 146:1 180:7 187:13 237:13 2017 88:3 118:10 126:3 127:11 128:20 129:11 136:4 205.501(a)(8) 60:6 205.605 47:6,10 253:14 205.606 42:5 21 146:1 328:16 338:2 342:17,18 343:1,19 344:9 347:20 385:12 21st 87:1 129:16 21's 328:16 22 108:14 343:6 24 3:5 177:22 216:22 25 3:6 98:13 100:15 262:8 275:19 25,000 34:4 26 259:12 271:20 273:2 | 284 3:10 29th 37:20 <hr/> 3 <hr/> 3rd 44:13 3,000 328:8 3-percent 339:5 30 24:1 30:1 86:12 162:4 167:1 257:7 30,000 238:16 300 177:19 304 3:13 31 260:9 263:16 32 341:20 320 3:17 337 3:20 35 377:8 386:7 37 381:22 393:7 38 139:10 397 3:22 <hr/> 4 <hr/> 4 3:3 4B 171:6 4th 42:9 44:21 4:54 397:7 40 276:9 40-page 198:13 42 11:14 45 137:5,7,16 48 116:4 49,000 139:3 <hr/> 5 <hr/> 5 343:6 5.1 34:19 5:30 283:9 306:19 50 270:11 340:9 50-percent 339:7 500,000 32:20 501(a)(11)(4) 60:15 58 345:14 <hr/> 6 <hr/> 6th 1:11 106:12 6,000 116:4 605 48:7 74:20 120:11 | 606 48:7 74:21 120:12 65-year-old 273:3 6517 74:22 75:14 6517(c)(1)(B)(I) 285:10 67 3:8 207:14 67.9 207:9,16 69 100:14 <hr/> 7 <hr/> 70 207:9 700 86:18 275:10 <hr/> 8 <hr/> 8:00 1:10 396:16 397:5 8:01 4:2 85 34:3 259:22 <hr/> 9 <hr/> 9 1:8 90 259:22 90s 108:18 921 1:11 93 130:5,7 95 240:19 |
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C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: National Organic Standards Board

Before: USDA

Date: 04-09-13

Place: Portland, Oregon

was duly recorded and accurately transcribed under my direction; further, that said transcript is a true and accurate record of the proceedings.



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

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MEETING OF THE NATIONAL ORGANIC
STANDARDS BOARD (NOSB)

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WEDNESDAY

APRIL 10, 2013

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The National Organic Standards
Board convened at 8:00 a.m. at the Hilton
Portland & Executive Tower, 921 Southwest 6th
Avenue, Portland, Oregon, Mac Stone,
Chairperson, presiding.

MEMBERS PRESENT

MAC STONE, Chairperson

HAROLD AUSTIN

CARMELA BECK

COLEHOUR BONDERA

JOSEPH DICKSON

TRACY FAVRE

JAY FELDMAN

JOHN FOSTER

WENDY FULWIDER

NICHOLAS MARAVELL

JEAN RICHARDSON

ZEA SONNABEND

MAC STONE

JENNIFER TAYLOR

FRANCIS THICKE

CALVIN WALKER

STAFF PRESENT

MILES McEVOY, Deputy Administrator, National
Organic Program

MICHELLE ARSENAULT, Advisory Board Specialist

MELISSA BAILEY, Director, Standards Division,
National Organic Program

LISA BRINES, Standards Division, National
Organic Program

A G E N D A

| | |
|--------------------------------------|-----|
| Policy Development Subcommittee..... | 7 |
| Public Comment..... | 22 |
| Aquaculture Working Group..... | 44 |
| Livestock Subcommittee..... | 107 |
| Public Comment..... | 133 |
| Crops Subcommittee..... | 196 |
| Public Comment..... | 317 |

1
2
3
4
5
6
7
8
9
10
11
12
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P R O C E E D I N G S

(8:01 a.m.)

CHAIRMAN STONE: I've got eight o'clock. We'll get the meeting settled down and we'll get to work this morning. We have a lot of information to exchange amongst ourselves in the room, so I want to have as much opportunity to do that as we can.

Again, thank you all for being here. We have an aggressive agenda. We'll start with policy and then we've got livestock. We'll have a presentation on aquaculture this morning, and the afternoon is dedicated to the Crops Committee, and obviously the tree-fruit conversation will dominate the afternoon.

So we want to have as much opportunity for information exchange as possible. This morning, Miles has a little thought for the day, I believe, is what we'll call this. So Miles, if you have a mic up there and thought for the day.

1 MR. McEVOY: Okay. Good morning,
2 everyone. Oh, we've got a little less people
3 here this morning. People just waking up, but
4 we'll have a poem to share. This is a poem
5 from Marge Piercy. It's called "The Influence
6 Coming Into Play, the Seven of Pentacles."

7 "Under a sky the color of pea
8 soup, she's looking at her work growing away
9 there, actively, thickly like grapevines or
10 pole beans. As things grow in the real world,
11 slowly enough. If you tend them properly, if
12 you mulch, if you water, if you provide birds
13 that eat insects, a home and winter food; if
14 the sun shines and you pick off caterpillars.

15 "If the praying mantis comes and
16 the lady bugs and the bees, then the plants
17 flourish, but at their own internal clock.
18 Connections are made slowly. Sometimes they
19 grow underground. You cannot tell always by
20 looking what is happening.

21 "More than half a tree is spread
22 out in the soil under your feet. Penetrate

1 quietly as the earth worm that blows no
2 trumpet. Fight persistently as the creeper
3 that brings down the tree. Spread like the
4 squash plant that overruns the garden. Gnaw
5 in the dark and use the sun to make sugar.

6 "Weave real connections, create
7 real nodes, build real houses. Live a life
8 you can endure. Make love that is loving.
9 Keep tangling and interweaving and taking more
10 in, a thicket in bramble, wilderness to the
11 outside, but to us, interconnected with rabbit
12 runs and burrows and layers.

13 "Live as if you like yourself and
14 it may happen. Reach out, keep reaching out,
15 keep bringing in. This is how we are going to
16 live for a long time. Not always, for every
17 gardener knows that after the digging, after
18 the planting, after the long season of tending
19 and growth, the harvest comes."

20 CHAIRMAN STONE: Thank you. Very
21 appropriate. Appreciate that. We're going to
22 jump right into the Policy Subcommittee, so

1 I'll turn the microphone over to Colehour
2 Bondera.

3 Policy Development Subcommittee

4 MEMBER BONDERA: Okay. Thank you
5 very much and good morning to everybody. I
6 hope that this is a good, smooth, easy start
7 to our day. So yeah, I'm the chair of the
8 Policy Development Subcommittee, and we are
9 going to present today a few items.

10 Let me just briefly talk about
11 what we are and who we are. Like it says on
12 the screen, the members are on the right there
13 of the Subcommittee, and we're trying to
14 provide guidance, clarification and/or
15 proposed standards for operations, policies
16 and procedures.

17 We're the internal subcommittee,
18 and I think that one of our ongoing activities
19 is the content and updates of the policy
20 procedure manual, which is our -- like I was
21 told when I started, is our bible, and I think
22 many people do see it that way. I think that

1 that's vital, and our new member guide, and
2 then working in collaboration with other
3 subcommittees, where policy issues are
4 unfolding.

5 So today, we're going to be
6 talking about three items, and I guess that
7 frankly, in my slide there on -- with the word
8 "Recommendation" at the top is slightly
9 erroneous since the third one is actually a
10 discussion document.

11 But we're going to talk about the
12 New Member Guide, Public Communications, and
13 new material initiation discussion.

14 Generally speaking, and each of
15 the lead people will in a moment talk about
16 this, the written comments that came in, we
17 received none on the New Member Guide, which
18 is fine. It's for a new member of the NOSB.
19 So it's really an internal process.

20 And really on the other two items,
21 Public Communications and material initiation
22 discussion document, there were not a lot of

1 comments. But we can, you know, listen to
2 each of the lead people review those, and then
3 we can listen to the public testimony provided
4 at that time.

5 So I'm going to at this point in
6 time turn it over to our initial one, who is
7 Calvin Reuben Walker on the New Member Guide.

8 MEMBER WALKER: Good morning.
9 Probably before Colehour sit down, I probably
10 will be finished, so we can move on to other
11 topics. As Colehour mentioned, there was
12 three individuals signed up for oral comments.
13 One was scheduled for yesterday but did not
14 appear. One is scheduled, I believe, for
15 today, maybe two.

16 So I have a total of about 500
17 slides, if that will be okay. I'm going to
18 try to condense them down, just kidding Wendy.
19 I condensed them down to four, and as Colehour
20 mentioned, it wasn't a lot. There was no
21 written comments, but I would like to share
22 with you the changes that the Subcommittee

1 did.

2 (Pause.)

3 MEMBER WALKER: Oh, okay. Well,
4 since I have so many slides I can go through
5 them verbally. The purpose of the New Member
6 Guide is primarily to provide new guidance for
7 the members. As the Vice Chair of the Policy
8 Subcommittee mentioned that it will be a while
9 before we have any new members.

10 But still, we do this on an annual
11 basis, and also another purpose is to help
12 ease the transition of new members.

13 Personally, I found it helpful. When the
14 program -- when I was appointed to the Board,
15 I found it very helpful to have a New Member
16 Guide.

17 It is updated yearly, and the
18 reasons are for policy changes, subcommittee
19 membership changes, staffing changing and
20 personnel additions. Of the updates, one was
21 in '07. '08 there was two. In '09 there was
22 one update. In 2010, there were one, and last

1 year was one update.

2 Next to the last slide. The
3 general changes were one, membership changes.
4 As you know, we had went from committees to
5 subcommittees. So that was noted in the
6 update.

7 Where we had executive director
8 and Lorraine Coke in the document, we made the
9 modification of our current individual,
10 Michelle Arsenault, where there's an email,
11 and she's our Designated Federal Officer.

12 We've replaced the Terms
13 Committee, it was quite extensive in the
14 document, to subcommittee. We kind of fine-
15 tuned the Travel section of the document, and
16 we also noted that the listing of Federal
17 Agencies, All, was not in alphabetical order.
18 So we placed an order to those.

19 And next to the last thing what we
20 did was officers, as you know, changed. Last
21 year at this time it was Dr. Barry Flamm, our
22 chair. Subcommittee changes, so we made those

1 changes.

2 Another change we did, but it's
3 still listing all the program personnel and
4 numbers and emails. We didn't use that; we
5 just created the link.

6 Last slide. This is -- oh, it's
7 not. The committee consists of Colehour --

8 (Off record comment.)

9 MEMBER WALKER: Oh, how about
10 that. Next to the last. Yes, that's the one.
11 The committee members are the chair, Colehour
12 Jordan Bondura, Jay Feldman, John Foster our
13 Vice Chair of the Board, Nick Maravell,
14 Jennifer Taylor and yours truly.

15 That is in essence the changes
16 that we have provided to the New Membership
17 Guide. As we said, there was no written
18 comments and there was two individuals signed
19 up for oral comments we'll get to hear from.
20 That is it.

21 MEMBER BONDERA: Thank you very
22 much, Calvin. We're going to go ahead and

1 move on directly to Jennifer presenting to us
2 about Public Communications. Thank you.

3 MEMBER TAYLOR: Good morning. I'm
4 going to talk just a bit about the Public
5 Communications proposal.

6 The National Organic Standards
7 Board recognizes that members have been
8 specifically appointed to the Board to provide
9 advice and counsel to the Secretary concerning
10 policies related to the development of organic
11 standards, and the creation and amendments to
12 the National List.

13 A part of the Board's
14 responsibility is to communicate with the
15 organic community pertaining to the
16 implementation of the Organic Foods Protection
17 Act. The Board must receive and review
18 information from the USDA National Organic
19 Program and other sources during its
20 deliberations.

21 Input from the organic community
22 is valuable in the deliberations of the Board

1 and the program and the community decision-
2 making process. So therefore, providing an
3 online mechanism that allows the public to
4 share information between official comment
5 periods will help to facilitate public
6 communication that informs the Board and
7 program deliberation in several ways.

8 So the online system is intended
9 to inform discussions early on in the
10 Materials Policy Review process, reduce the
11 amount of new information coming to the Board
12 and the program late in its deliberations,
13 increase transparency for the Board and the
14 program and the public itself to ensure that
15 everyone has access to the same information in
16 a timely fashion, and to help the Board and
17 the program to become aware of issues that may
18 not be on the work plan, or may not have been
19 generated internal to the program in the
20 Board's process, but are important.

21 The NOSB recommends, then, that
22 the program establish a year-round online

1 communication mechanism for stakeholders to
2 communicate with the Board and the program on
3 matters of interest and concern.

4 The recommendation that you'll
5 find in the public document reads "The NOSB
6 proposes amending PPM Section 6, Miscellaneous
7 Policies, page 27, to add a new subcategory,
8 which is listed in italics, 'Policy for Public
9 Communication Between NOSB Meetings.'"

10 The NOSB and the program seek
11 Public Communications outside of the Board by
12 annual meetings and public comment periods, to
13 inform the NOSB and the NOP of stakeholders'
14 interest, and to comment on the NOB's and
15 N.O.P.'s work activities year round.

16 It goes on to state the PPM
17 Section 2 adds a phrase to the role of an
18 advisory board specialist to include the
19 following language: "With support from NOP,
20 identify, implement, administer and maintain
21 a year-round Public Communications mechanism,
22 Internet and other means, by which public

1 feedback can be received, posted and archived
2 online for viewing by the NOSB and the NOP and
3 the public."

4 As a result of the posting and the
5 development of this information, the NOSB
6 received public comment that were very
7 supportive of the idea.

8 All of the comments were
9 supportive of the idea, and the concept of
10 providing a central location for all public
11 communication to the Board and to the program,
12 that would enable and enhance transparency in
13 Public Communications, and provide access to
14 information from the organic community is very
15 important.

16 So some of the comments that we
17 received, the positive comments were "We
18 support the proposed Public Communications
19 policy. It is important that the members of
20 the NOSB have access to input from the organic
21 community during all stages of its
22 deliberations."

1 Another comment. "We believe that
2 the development of a year-round online
3 communication mechanism would enable
4 thoughtful feedback on issues, provide an
5 opportunity to identify new or emerging
6 issues, prioritize issues and share timely
7 developments in thinking." That's also how we
8 were thinking about the idea as well.

9 Other comments include "We
10 specifically like the proposed policy for
11 Public Communications between the NOSB
12 meeting, voted by the Policy Development
13 Subcommittee. We think that a year-round
14 public communication mechanism sponsored by
15 the Board is preferable and more transparent.
16 We appreciate this recommendation."

17 The Public Communications proposal
18 in itself is seeking to establish the
19 development of a year-round online
20 communication mechanism for all stakeholders
21 to communicate with the NOSB and with the
22 program on matters of interest and concern.

1 The Subcommittee vote on the
2 proposal was done on, excuse me, on January
3 22nd, and six of the members of the
4 Subcommittee voted to approve the proposal and
5 the recommendation, and two were absent.

6 Thank you.

7 MEMBER BONDERA: Thank you very
8 much. At this point in time, I would like to
9 have Jay Feldman talk about the discussion
10 document on material initiation that we had
11 put forth, that I think he will be able to
12 talk about the public comment that came in on
13 that after he introduces it. So thank you.
14 Jay.

15 MEMBER FELDMAN: Thank you
16 Colehour. So thank you. Okay. This is a
17 discussion document on materials review
18 initiation.

19 The statutory basis for work in
20 this area stems from OFPA 6518(n), which
21 states the Board shall establish procedures
22 under which persons may petition the Board,

1 for purposes of evaluating substances for
2 inclusion on the National List.

3 This issue is addressed in the
4 policy and procedures manual, and which says
5 the PPM policy dealing with NOP requests for
6 modified or new standards, which we call the
7 NOB-N.O.P. collaboration, reads as follows:

8 "Recommendation for modification
9 of existing standards or new standards. The
10 NOSB will use the decision-making procedures
11 outline in Section 8 to justify modifying
12 existing standards or proposing new standards.
13 The NOP may request that the NOSB develop
14 recommendations for new or existing standards.

15 "The request should be in writing,
16 and should include a statement of the problem
17 to be addressed, background including the
18 current policy or situation, statutory or
19 regulatory authority, legal situation, desired
20 time frame for receiving the recommendation.
21 The request will be posted on the NOP
22 website."

1 The manual goes on to say "The
2 committee work plan arises out of these main
3 situations, items committed or assigned to a
4 subcommittee by the Board during an official
5 session, items that are reviewed by a
6 subcommittee on a regular basis, such as a
7 materials sunset review, for petitions
8 submitted by members of the public, requests
9 or suggestions from the National Organic
10 Program such as clarifications on a particular
11 issue or guidance on enforcement, proposals
12 stemming from the Subcommittee members'
13 contact with the organic community.

14 So the purpose of this discussion
15 document, four points. Clarify whether the
16 policy on NOB-N.O.P. collaboration covers
17 materials review.

18 Clarify whether NOSB initiated
19 proposals arising from contacts with the
20 community may include materials review.
21 Clarify the process used by the NOSB in
22 initiating review in these cases, and to

1 receive feedback on priority of petitions.

2 We received seven comments on
3 this, and we may hear that we received more,
4 if my work from yesterday is any indication.
5 But I hope I covered them all. There were
6 seven comments on the proposal. Wolfe,
7 DiMatteo & Associates, OTA, Hain Celestial
8 Group, White Wave and California Natural
9 Products all objected to considering the
10 issue, but at the same time offered comments.

11 Beyond Pesticides and Cornucopia
12 did not object to considering the issue and
13 offered comments. All commenters agreed that
14 all materials issues should use the public
15 petition process.

16 All except Wolf DiMatteo said that
17 the NOSB-N.O.P. collaboration process covers
18 materials review, and Wolf DiMatteo said to
19 stretch the interpretation of the NOSB-N.O.P.
20 collaboration section of the PPM, as has been
21 suggested in this discussion document, would
22 not be in the interest of the stakeholders,

1 who through OFPA, are the persons that may
2 petition the Board regarding the National
3 List.

4 And then no one objected to the
5 current priority-setting process. Thank you.

6 MEMBER BONDERA: Yeah. I think
7 that that wraps us up in terms of where our
8 Subcommittee worked and what we did. I'm
9 going to pass it back to our Chairman.

10 Public Comment/Policy Subcommittee

11 CHAIRMAN STONE: Okay. We have
12 two people signed up for public comment.
13 First up is Sophie Sherman-Burton, and on deck
14 will be Steve Connor.

15 Good morning, and just if you're
16 not familiar, some of you weren't here
17 yesterday, it's your first time. There's a
18 little green light. When it goes yellow,
19 Michelle, that means you have like one minute
20 or something? Then when it goes red, it makes
21 an obnoxious beep.

22 MS. SHERMAN-BURTON: Thank you.

1 CHAIRMAN STONE: Thank you, and
2 welcome for being here.

3 MS. SHERMAN-BURTON: So my name is
4 Sophie, and I'm a member of the Cornucopia
5 Institute, and here today as a citizen
6 lobbyist.

7 I just wanted to comment before I
8 begin that I am really concerned about the use
9 of antibiotics in our orchards, not just
10 because of residues but because of the medical
11 implications as well.

12 So the Cornucopia Institute
13 supports the proposal to establish a year-
14 round online communications mechanism, to
15 facilitate communication between organic
16 stakeholders and NOB and N.O.P.

17 The ability to communicate year-
18 round will benefit the NOB and the organic
19 community as a whole. Thank you for this
20 proposal.

21 We strongly urge the N.O.P. and
22 NOB to ensure that this mechanism will not

1 become a substitute for any of the other
2 vehicles for public announcement and
3 participation that are already in place.

4 However, Cornucopia believes it is
5 unrealistic to expect NOB members, who are
6 busy enough volunteers as it is, to log on to
7 an online forum on a regular basis, to
8 ascertain if there are any noteworthy recent
9 postings.

10 Therefore, we suggest a daily
11 digest email be sent to NOB members' email
12 addresses, as well as to interested public
13 stakeholders. This will allow the proposed
14 forum to become a means for NOB members to
15 keep a pulse on the organic community, without
16 becoming overwhelmed with additional
17 responsibilities for logging on or reading
18 comments.

19 Cornucopia has some additional
20 suggestions for maximizing public input.
21 Cornucopia is concerned with the short time
22 frame for submitting comments to NOB

1 discussion documents and proposals. For the
2 Fall 2012 meeting, the public was given 25
3 days to comment.

4 For the Spring 2013 meeting, there
5 were 22 days between the public announcements
6 to the organic community and the due date for
7 comment.

8 One way to lengthen the time frame
9 for submitting comments is by posting
10 discussion documents as they become available,
11 rather than waiting for the semi-annual
12 meeting notice, using the proposed online
13 communication mechanism and using the N.O.P.
14 Insider to alert the public.

15 Recent discussion documents have
16 often been long, detailed and highly technical
17 papers. These take time to read, research and
18 analyze, and 30 days or 22 days, as was
19 recently the case, is simply not enough to
20 adequately address these extensive documents.

21 Some of these discussion documents
22 were finalized prior to the agenda posting,

1 sometimes weeks ahead of time. Since it is a
2 discussion document, often with a long list of
3 questions that the NOB Subcommittee seeks
4 public input on, it would be advantageous for
5 the public to have access to these documents
6 as they become available.

7 For example, the discussion
8 document on GMOs and seed purity was first
9 posted prior to the Fall 2012 meeting. The
10 same discussion and questions were reposted
11 for the Spring 2013 meeting, but the public
12 was not notified that this was forthcoming.

13 The purpose for the reposting was
14 to gather additional input from organic seed
15 producers and handlers. If additional input
16 is desired on a discussion document, the
17 document could be immediately posted.

18 This would allow discussion within
19 the organic community, and allow time for the
20 input the NOSB is seeking. We would also
21 suggest that the deadline for commenting on
22 discussion documents be lengthened to at least

1 30 days past the date of the meeting. Thank
2 you for considering Cornucopia's comments.

3 CHAIRMAN STONE: Thank you. Are
4 there any questions for the presenter?

5 (No response.)

6 CHAIRMAN STONE: All right. Thank
7 you very much. Steve Connor.

8 MR. CONNOR: Hi. My name is Steve
9 Connor, as he already told you. I'm a member
10 of the Cornucopia Institute, and I'm here
11 today as a citizen lobbyist.

12 When I'm not up here outside my
13 comfort zone, I run a scaffold company here in
14 town. I've been eating organics for about the
15 last ten years, and I never get sick anymore.
16 It's in my interest to uphold the organic
17 policies that we have set forth in the United
18 States.

19 Cornucopia believes in
20 transparency and maximizing public engagement.
21 For this reason, we believe the NOSB and the
22 NOP should follow the same procedures as the

1 public in initiating material review. We can
2 think of no situations where it would be
3 appropriate for a change to the National List
4 to bypass the public petition process.

5 While it's entirely reasonable and
6 appropriate for NOSB members to be proactive
7 and initiate material review, their position
8 on the Board should not enable them to bypass
9 the public petition process, eroding
10 transparency and public participation.

11 We believe the existing
12 prioritization schedule, as outlined in the
13 policy and procedures manual, already
14 adequately ensures that the most important
15 items, petitions to remove materials from the
16 list, or the priority given to materials for
17 which environmental or health concerns exist,
18 be dealt with on an expedited basis.

19 Material review initiated by the
20 NOSB or NOP should be held to the same
21 prioritization schedule. The committee asked
22 for additional comments. Cornucopia would

1 like the NOSB to develop a policy for the
2 reconsideration of yes votes on material
3 review.

4 Under Roberts Rules of Order, a
5 member of the NOSB who voted with the majority
6 to, for example, add a material to the
7 National List, but then changes his or her
8 mind after the vote, can offer a motion to put
9 the item back on the agenda.

10 There have been a number of
11 instances in the past when Board members,
12 especially new Board members, voted to approve
13 a material during the meeting, only to
14 discover after the meeting that some of the
15 information that they relied on to make this
16 decision was materially flawed.

17 In such cases, we believe there
18 should be an established mechanism outlined in
19 the PPM for Board members to put the item back
20 on the agenda, and call for a revote at the
21 next meeting.

22 Cornucopia also encourages the

1 Policy Development Subcommittee to consider
2 recommending a prioritization schedule for
3 standards development. The NOP currently
4 instructs the NOSB to give priority to
5 petitioned materials.

6 This has led to slow development
7 of standards, including in cases where
8 existing standards needed clarification, such
9 as pasture rule and for the outdoor access for
10 poultry.

11 We believe that the clarification
12 of standards, especially when they involve
13 loopholes being exploited, should be given
14 priority over the development of new
15 standards.

16 Priority should be given to
17 clarification of existing standards, when
18 members of the organic community claim
19 economic harm arising from the lack of clarity
20 on the existing rule.

21 Examples include outdoor space for
22 organic poultry, or the alleged loophole

1 allowing continual introduction of
2 conventional replacement dairy cattle on
3 organic dairy farms.

4 Development of new standards that
5 are not explicitly required should only be
6 worked on after loopholes have been closed,
7 and after standards required by OFPA, such as
8 peer review, have been adequately dealt with.
9 Thank you very much. That didn't feel like
10 four minutes.

11 CHAIRMAN STONE: Thank you, Steve.
12 Is there any questions for the presenter?
13 Waldo.

14 MR. FOSTER: So a couple of times
15 you mentioned bypassing the petition process,
16 where I'm not seeing anyone wanting to do
17 that. So where are you urging us not to
18 bypass the public petition process, and why is
19 that a concern for you?

20 MR. CONNOR: Well, I'm not
21 necessarily saying that there are, but it's
22 always a good policy to keep aware that we

1 want to keep the foxes out of the hen houses.

2 CHAIRMAN STONE: Thank you. Okay.
3 That's it for this session. Mr. Chairman, did
4 you want to proceed with the vote, or are we
5 going to wait until Thursday?

6 MEMBER BONDERA: At this point in
7 time, I think it's -- I would entertain if
8 there's discussion among Board members on
9 these subjects to pursue that. But if there's
10 not, I think that we could move forward with
11 the vote. So I would entertain any
12 discussion.

13 CHAIRMAN STONE: Any discussion
14 from the Board on these two proposals, New
15 Member Guide or Public Communications? Jay.

16 MEMBER FELDMAN: Excuse me.
17 Thanks, Mac. Just to say that I'm really
18 pleased at the progress we've made on this
19 whole Public Communications thing.

20 I think it's, it would be
21 incredibly helpful to the public and to the
22 Board and to the program, to have the insights

1 of the public on an ongoing basis.

2 Yeah, it will be more information,
3 but it will be more timely information to the
4 deliberations of the subcommittees, and less,
5 hopefully less 11th hour sort of decision-
6 making, where we're getting new information at
7 the last moment, and trying to integrate that
8 into our final decisions.

9 So I don't sense any objection.
10 I'd like to hear if there is among any of the
11 Board members any objection. But it sounds
12 like there's, this is one of those consensus
13 proposals. I hope I'm correct about that.
14 Thank you.

15 CHAIRMAN STONE: John.

16 MEMBER FOSTER: So I agree. I
17 think that progress on this has been terrific.
18 It's a pretty different place now than it was
19 when it started.

20 My one concern I have is some
21 comment came up with a daily digest. I don't
22 know about other people, but I get about 300

1 emails a day, and I need to really deal with
2 about 250 of them.

3 One more doesn't sound like a lot,
4 but when the content is as significant as this
5 is, it is a lot. So I'd just, I'm not -- I
6 don't want to sign on through this document to
7 a daily email, and that's putting a lot of
8 burden on the program also that we can't count
9 on. But in concept, I like the idea.

10 The other concern I have is that
11 in a small town when you put up a stop sign,
12 that implies that there's going to be people
13 held accountable when they don't use it
14 anymore. Same thing here. If there's
15 information being delivered to Board members
16 on a regular basis, there's going to be lots
17 of opportunity for criticism if we're not
18 reading it every day or every week.

19 That worries me too, just because
20 you have exposure to information. It's going
21 to -- I'm sensitive to kind of what, to not
22 being able to keep up, all of us keeping up.

1 I want to make sure that there's some sort of
2 cushion that we all have, because a lot of,
3 you know, everyone on the Board has their own
4 life, and I want to make sure that we're not
5 going to be --

6 Just because someone submits
7 something on Tuesday, that we're all going to
8 be accountable for knowing it on Wednesday.
9 That's it.

10 CHAIRMAN STONE: All right, thank
11 you, and in our conversation with the program,
12 this isn't like a listserv that's going up
13 next week or something. This is going to take
14 quite a while to determine staffing and
15 capabilities and filtering and all sorts of
16 things that social media has gone through, to
17 protect it and make it a useful tool.

18 So this is, this will be a while,
19 a work in progress, to see what it actually
20 looks and feels like. Miles.

21 MR. McEVOY: Yeah. As I mentioned
22 in the opening remarks, the program is very

1 supportive of this concept of having an
2 ongoing Public Communications channel, both
3 for the program and for the NOSB. Jenny
4 Tucker, the Associate Deputy Administrator,
5 assures me that we can set this up.

6 But we're going into a little bit
7 of unchartered territory of the actual
8 mechanisms for doing that, if you have some
9 concerns about how much time and resources it
10 will take for us to do it.

11 But we're very excited about the
12 project of getting an ongoing Public
13 Communications system in place. So thanks.

14 CHAIRMAN STONE: Okay. Anything
15 else or proceed with the vote?

16 (No response.)

17 CHAIRMAN STONE: Okay. I think
18 we'll, just since Francis is brand new, I'm
19 not going to make him be the first vote coming
20 out of the gate. So that puts it over to
21 Colehour. So is there any conflict of
22 interest does anyone have on this

1 recommendation, or declaration of interest is
2 actually the word.

3 (No response.)

4 CHAIRMAN STONE: Seeing none, and
5 again, to those in the audience, this is
6 discussed at the Subcommittee level.

7 I just want to make sure that as
8 we get to the actual voting, if any member has
9 had thoughts or something that's arisen or
10 changed since the Subcommittee conversation
11 started, this is public transparency of that.
12 So seeing none, Colehour, proceed with the
13 vote.

14 MEMBER BONDERA: You need to have
15 a motion on the table.

16 CHAIRMAN STONE: Oh, that would be
17 good. The recommendation is to accept the
18 revised 2013 -- oh, we're on the
19 communications. Excuse me. Pardon? Start
20 with this one? Okay.

21 The recommendation is to accept
22 the revised 2013 NOSB New Member Guide that is

1 attached and was presented in principle
2 earlier by Calvin.

3 MEMBER FELDMAN: I so move.

4 CHAIRMAN STONE: Is there a
5 second?

6 MEMBER TAYLOR: I second.

7 CHAIRMAN STONE: Any further
8 discussion?

9 (No response.)

10 CHAIRMAN STONE: Seeing none,
11 we'll start the vote with Colehour?

12 MEMBER BONDERA: Aye.

13 MEMBER FAVRE: Yes.

14 MEMBER SONNABEND: Yes.

15 MEMBER FELDMAN: Yes.

16 MEMBER RICHARDSON: Yes.

17 MEMBER DIXON: Yes.

18 MEMBER FOSTER: Yes.

19 MEMBER WALKER: Yes.

20 MEMBER FULWIDER: Yes.

21 MEMBER AUSTIN: Yes.

22 MEMBER TAYLOR: Yes.

1 MEMBER MARAVELL: Yes.

2 MEMBER THICKE: Yes.

3 CHAIRMAN STONE: The Chair votes
4 yes. That was unanimous. Thank you very
5 much. We will move to the recommendation on
6 public communication. The recommendation is
7 NOSB proposes amending the PPM Section 6,
8 Miscellaneous Policies, page 27, to add a new
9 subcategory in italics. "Policy for Public
10 Communication Between NOSB Meetings."

11 The NOSB and the NOP seek Public
12 Communications outside of the Board biennial
13 meetings and public comment periods, to inform
14 the NOSB and the NOP of stakeholders'
15 interest, and to comment on the NOSB's and
16 NOP's work activities year-round.

17 PPM Section 2, page 13 adds a
18 phrase to the role of an advisory board
19 specialist to include the following language:
20 "With support from NOP, identify, implement,
21 administer and maintain a year-round Public
22 Communications mechanism, `Internet and other

1 means,' by which public feedback can be
2 received, posted and archived online for
3 viewing by the NOSB and the NOP and the
4 public." Is there a motion?

5 MEMBER FELDMAN: I was --

6 CHAIRMAN STONE: Motion by Jay.
7 Second by Jennifer?

8 MEMBER FELDMAN: No. I was going
9 to second.

10 CHAIRMAN STONE: Motion by
11 Jennifer.

12 MEMBER FELDMAN: I second.

13 CHAIRMAN STONE: Second by Jay.
14 Any further discussion? John.

15 MEMBER FOSTER: I just want to
16 reiterate what we talked about in the prior
17 meetings and in our session on Monday, that
18 I'm not quite certain that itemizing job
19 descriptions for NOP staff is appropriate in
20 our policy and procedure manual.

21 So I know that's no surprise. I
22 just want to get it out there and make sure

1 it's part of the transcript.

2 CHAIRMAN STONE: Very good.
3 Anything else? Colehour?

4 MEMBER BONDERA: Yes, and thank
5 you, John, for your comment. I think it's
6 worthwhile to point out when we did have that
7 discussion on Monday, that the fact is that we
8 are in the process right now of reviewing and
9 revising and updating the PPM.

10 So if it is deferment as you've
11 put forth, that it may not be appropriate
12 and/or we need to modify that, that is in
13 process at this time.

14 So I just want to make sure that
15 this isn't seen as -- if this is done, then
16 this is the way it is, because that's already
17 up to reconsideration anyway.

18 CHAIRMAN STONE: Any other
19 thoughts, comments from Board members?

20 (No response.)

21 CHAIRMAN STONE: Okay, seeing
22 none, Tracy, we'll start the vote with you.

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MEMBER FAVRE: Yes.

MEMBER BECK: Yes.

MEMBER SONNABEND: Yes.

MEMBER FELDMAN: Yes.

MEMBER RICHARDSON: Yes.

MEMBER DIXON: Yes.

MEMBER FOSTER: Yes.

MEMBER WALKER: Yes.

MEMBER FULWIDER: Yes.

MEMBER AUSTIN: Yes.

MEMBER TAYLOR: Yes.

MEMBER MARAVELL: Yes.

MEMBER THICKE: Yes.

CHAIRMAN STONE: That appeared to be unanimous as well. I appreciate your work on that.

There are several of the materials, and even when we were talking about excluded methods, and there's already several topics that we're discussing that it was considered how this could be useful and give the public more time to help us in our

1 deliberations. Very good. Very good, Mr.
2 Chairman. We're exactly right on time. Good
3 job with that. Appreciate that.

4 Next, we're going to have a
5 presentation on aquaculture. As Miles said,
6 the program is working on a proposed rule for
7 aquaculture and Melissa said that April 11th,
8 I mean October the 11th, we should have
9 something on that.

10 So but at this time, we have Mr.
11 George Lockwood and Mr. Sebastian Belle.
12 George is chairman of the Aquaculture Working
13 Group. Sebastian was part of that group for
14 many years. They've worked tirelessly and
15 diligently for several years with previous
16 boards.

17 We wanted this Board to get up to
18 speed and try to regain some of that
19 institutional knowledge that was lost with the
20 transition of Board members, and be sure the
21 public is aware that this is back on our work
22 plan.

1 There are several materials being
2 petitioned for both aquatic and animal and
3 plant aquatic production. So the idea is here
4 for these gentlemen to give us a mental
5 picture and get us up to speed of how organic
6 aquaculture may look different than commercial
7 aquaculture, and a little bit about the rule,
8 the proposed recommendation -- the
9 recommendation that's being considered by the
10 program.

11 So with that Mr. Lockwood, we
12 appreciate you and Mr. Belle being here.
13 Aquaculture Working Group

14 MR. LOCKWOOD: Thank you, Mac. My
15 name is George Lockwood. I'm the chair of the
16 Aquaculture Working Group, and joining me is
17 my colleague Sebastian Belle.

18 We greatly appreciate this
19 opportunity to address the National Organic
20 Standards Board today. It's been about five
21 or six years since we last appeared.

22 What I would like to do this

1 morning is show some slides of typical
2 aquaculture systems, so that you have a better
3 idea as you process our petitions for
4 materials, how these materials will be used.

5 After the slide show, we will -- I
6 will then have a PowerPoint presentation of
7 how we are, the proposal from the National
8 Organic Standards Board that's now in final
9 rulemaking is substantially different than
10 conventional aquaculture.

11 The Aquaculture Working Group was
12 appointed in 2005 by the program and by the
13 Board. It consists of 12 people. I'll just
14 go quickly through. Sebastian Belle is the
15 Executive Director of the Maine Aquaculture
16 Association.

17 Bob Bullis is a veterinarian.
18 Ralph Elston is a Ph.D. in Veterinary
19 Medicine. Rebecca Goldberg, when she joined
20 us, was with the Environmental Defense Fund.
21 She's now with the Pew Memorial Trust.

22 Ron Hardy is the Director of the

1 University of Idaho Aquaculture Program. He
2 is probably the leading feed scientist in
3 aquaculture. John Hargreaves is a scientist
4 formerly with Louisiana State University.

5 Robert Mayo is a catfish farmer.
6 Christopher Nelson is an oyster processor.
7 Bart Reid is a shrimp grower. Albert Tacon is
8 a feed scientist. Kwemena Quagraine is an
9 economist with Purdue University and I was the
10 chair.

11 As a way of background for
12 aquaculture, the world's capture fisheries are
13 at their limits. One-half of all seafood
14 today is from aquaculture. It's amazing. The
15 last 40 years, 30 years, aquaculture has grown
16 to what it is. Half of the food that's eaten
17 today, seafood eaten today, is farm grown.
18 That's true in the world and it's true in the
19 United States.

20 Any growth in seafood consumption
21 is going to have to come from aquaculture.
22 This last year or in 2010, the USDA and the

1 Health and Human Services agency published
2 dietary guidelines for Americans, recommending
3 increased consumption to at least two servings
4 per week of seafood.

5 Farm seafood is the only major
6 animal protein without USDA organic standards,
7 and contrary to the intent of the Organic Food
8 Production Act for single and consistent USDA
9 standards, we have today salmon, shrimp,
10 tilapia, oysters and perhaps other seafoods
11 that are illegally marketed in the United
12 States with organic claims, and some are not
13 even certified to any standards.

14 The chronology of the development
15 of our standards, in 1999 was the first
16 proposal to this Board for aquaculture
17 standards that simply wouldn't work.

18 Several of us went and asked the
19 Board to postpone consideration of organic
20 standards for aquaculture until the industry
21 and the aquaculture community could come
22 together, which we did at a conference at the

1 University of Minnesota, where we had people
2 from the organic community and from the
3 aquaculture community that began discussing
4 what organic aquaculture standards might look
5 like.

6 Margaret Wittenberg, who was then
7 a member of NOSB, chaired a group of about 25
8 of us, that in essence did a feasibility
9 study. Would organic aquaculture match, or
10 would aquaculture match organic principles?

11 In 2003 and 2004, an independent
12 ad hoc group called the National Organic
13 Aquaculture Working Group, came up with a
14 proposed set of standards, and in 2005, was
15 the official appointment of the Aquaculture
16 Working Group to advise the Board and the
17 program on the advancement of such standards.

18 We work closely with the NOSB, and
19 in 2006, we produced our interim final report
20 that excludes mollusks. This was a
21 comprehensive set of standards for
22 aquaculture, except for mollusks.

1 In the Spring of 2007, the NOSB
2 recommended that the bulk of what we were
3 recommending but held back for further
4 consideration are matters of feed and
5 facilities, particularly net pens.

6 In Fall 2008, the second NOSB
7 recommendations came out for feed and for
8 facilities. The only work we had left to do,
9 then, was for bivalves, which we completed in
10 the Spring of 2010. Since then, we've been
11 awaiting final rulemaking, which is beginning
12 now. Sebastian.

13 MR. BELLE: Hello, and thank you
14 for giving us the opportunity. We're going to
15 show you a series of slides of aquaculture
16 operations. We have a problem, which is that
17 we can't show you slides of organic
18 aquaculture operations.

19 So what we're going to try to do
20 is show you slides of what's out there now,
21 and then George will wrap up with some points
22 about how what is being proposed under the

1 current standards is really fundamentally
2 different than what's happening right now.

3 But I want to just leave you with
4 one thought. My organization represents 180
5 farms. Most of them are shellfish farms, but
6 we also have finfish farms, and right now we
7 are competing in the marketplace against
8 organic seafood which is being certified under
9 programs overseas, being brought into the
10 United States, and we're competing against it.

11 I can tell you that particularly
12 for our finfish growers, that is very
13 difficult. We are competing against, for
14 example, salmon that's certified in Europe
15 under European standards, which allow for the
16 use of antibiotics.

17 We have not used antibiotics in
18 the State of Maine for eight years. So that
19 gives you an idea of what it means for us as
20 domestic producers, as to whether or not we
21 can get those standards out there and we can
22 begin to start to work towards achieving them.

1 This is a picture about what's
2 called a polar circle cage. This is kind of
3 a standard finfish technology right now.
4 There's a net bag that hangs down underneath
5 that, and that's obviously one of the -- this
6 is one of the production methods which has
7 drawn a lot of fire.

8 It's open to the ecosystem. There
9 is a linkage between the ecosystem and the
10 farm itself, and when we developed the
11 standards, we worked very hard to recognize
12 that linkage, and to make sure that the
13 farming methods that were being allowed under
14 organic standards, were those that asked a
15 farmer, that required a farmer to farm in
16 synergy with the ecosystem around that farm,
17 as opposed to trying to dominate that
18 ecosystem.

19 This is a picture of a larger
20 farm. Again, these cages are moored in the
21 ocean. One of the things that we proposed in
22 the standard was a system whereby farms would

1 be rotated and fallowed between sites. There
2 would be a fallowing period, and that was a
3 very -- we have used that in Maine for now
4 eight years, and it's been a tremendously
5 effective way to break infection cycles.

6 That's one of the reasons we
7 haven't used antibiotics, is by using what is
8 called "all in, all out by year class
9 rotation" and site fallowing.

10 This is the only picture I have of
11 an organic farm currently in this slide, and
12 this is a picture about a farm called Lock
13 Duart in Scotland. The reason I put this in
14 here is this is an example of one of the
15 differences between what is proposed under the
16 organic standards and what a conventional farm
17 would be.

18 This farm is farming at about a
19 tenth of normal density of what a typical,
20 conventional salmon farm would be farming, in
21 terms of the number of fish in a cage.

22 You can -- a typical salmon farm

1 cage is this, the size of this room or larger.
2 You can sit as a diver on one side of that
3 cage underwater, and not see the fish on the
4 other side or even in the middle of the cage,
5 in an organically certified farm.

6 This is an example of something
7 called integrated multitrophic aquaculture.
8 This farm, in the foreground, you see what
9 look like salmon cages. They're actually
10 mussel rafts. So they're using shellfish,
11 aquatic plants and then finfish together, all
12 in one farm.

13 The way they deploy them is the
14 plants and the shellfish are downstream from
15 the salmon. So the nutrients coming out of
16 the salmon are being recycled by both the
17 aquatic plants and the mussels.

18 One of the most exciting things
19 that we found in Maine about this is that
20 mussels actually denature a number of the
21 viruses which attack salmon. So we are using
22 mussel rafts around the salmon cages as a

1 biological fence, to stop wild pathogens
2 coming into the farm.

3 It's a very new technique. It was
4 discovered in Maine actually four years ago,
5 and we're still trialing it. But it appears
6 to be very effective, based on the trials
7 we've had so far.

8 This is a slide of some mussels
9 that are raised on a mussel farm. If you look
10 in the background, there's a steel cage there.
11 That's the old kind of salmon farms that a
12 number of people are still using. So what
13 we've done is we've taken those old farms,
14 converted them to a mussel farm.

15 You have salmon and mussels being
16 grown side by side, and interestingly, the
17 growth rates we get on our mussels that are
18 located next to a salmon farm are two or three
19 times what they would be if they were located
20 away from the salmon farm.

21 This is kelp. We have a very
22 innovative company in Maine called Ocean

1 Approved. They were also growing kelp both
2 beside salmon farms and in other areas, and
3 they have just been very successful, and
4 they've built a product which Whole Foods now
5 sells in their frozen -- if you go to the
6 frozen pea, the frozen vegetable section and
7 you look next to it, you'll find Ocean
8 Approved kelp from Maine there.

9 These are some salmon eggs, just
10 so you know what they look like. That's what
11 a typical salmon hatchery looks like. In each
12 of those trays are the eggs from one female.
13 They're all kept separately and incubated for
14 period of time, and then they hatch out.

15 That's what a yolk sac larvae
16 looks like. One of the challenges we have in
17 finfish aquaculture, and this is true in
18 shellfish as well, is the period from the
19 hatchery to the nursery is what we call the
20 critical phase, when they're transitioning
21 from internal sources of food to external
22 sources of food.

1 This is true both for shellfish
2 and finfish, and this is the period in time
3 when the farmer has to be incredibly vigilant,
4 because your mortalities can be very high if
5 you don't do things right.

6 These are small salmon juveniles
7 in the hatchery before they're put out into
8 the ocean. This is what a typical feed looks
9 like.

10 This is actually catfish feed, but
11 there are a lot of different types of feed,
12 and if you look at the standards that were
13 proposed, I know one of the controversial
14 pieces of it was the use of fish meal and fish
15 oil as ingredients in fish feed.

16 We were lucky to have both Albert
17 Tracon and Ron Hardy on our working group, and
18 they really led us to a different place from
19 a feed formulation and manufacturing point of
20 view.

21 I think that anybody who has ever
22 been -- the standards that are proposed

1 underneath the NOSB recommendations are by far
2 the strictest in the world, and frankly there
3 are a number of people who have questions, in
4 terms of whether or not they're achievable or
5 not from a feed point of view.

6 But I think it's okay to set the
7 bar high, and see what we as human beings can
8 do from a creative and innovative point of
9 view.

10 This is monitoring of feeding on
11 the farms. One of the things that a lot of
12 people are doing now, not everybody, but a lot
13 of people, but one of the things which is
14 required under the standards is some form of
15 active feed monitoring, and basically that can
16 either be underwater video cameras or a
17 Doppler sonar sensor, which senses whether or
18 not the feed is coming down through the school
19 of fish, and coming out below the school of
20 fish.

21 If that happens, it automatically
22 cuts the feeding off. The reason for that is

1 because if feed is wasted on a farm, not only
2 is it expensive for the farmer, but it's also
3 a potential threat to the environment around
4 it. It can discharge nutrients directly into
5 the environment, and enrich the environment
6 around that.

7 If you're a bad farmer, you can
8 exceed the carrying capacity of the ecosystem
9 around the farm and crash the site, as they
10 say. So video monitoring is very important.
11 We require it in the standards, and it's a
12 technology which has really revolutionized
13 open net pen production.

14 This is another thing that we have
15 in the standards is the requirement for humane
16 slaughter, and this is a place that people
17 sometimes get uncomfortable about. But the
18 reality is on the finfish side of things, for
19 many, many years we were slaughtering fish in
20 what many of us viewed as a very inhumane way.

21 This is what's called a percussive
22 stunner. The fish go through and are hit

1 basically between the eyes with a bolt, the
2 way a veterinarian would kill a large animal,
3 and it is instantaneous and has been approved
4 by, for example, the British Humane Society as
5 being the way to slaughter and harvest fish.

6 This is again required in the
7 standard. It's not something that everybody
8 uses in the world of conventional, and I think
9 it's great that it's in the standard.

10 That's what we're competing
11 against right now. This is stuff being
12 imported from Scotland and currently sold in
13 the U.S. as organic.

14 MR. LOCKWOOD: This is a trout
15 farm in Idaho. I'll go rather rapidly through
16 these slides. These are raceways, where water
17 enters at the top of the picture and flows out
18 the bottom. Those conical things are how the
19 animals are fed.

20 Here's a trout farm in Hawaii.
21 You can see the water cascading down, which
22 produces, puts out fish into the water.

1 Here's Jim Pierce. Some of you may know Jim,
2 and you may know that at one time he was --
3 for 12 years he was growing trout in
4 Wisconsin.

5 This is his trout operation. He's
6 crowding the fish towards the camera. This is
7 his wife Cathy feeding some very small fish in
8 this particular tank.

9 Moving on to oysters, these are
10 oysters being grown in bags held off the sea
11 floor. The tide comes in and brings food, and
12 oysters consume the food and then -- and the
13 water goes out and they get exposed like this.

14 Here's a typical bag. When I've
15 used this system, we would start out with five
16 pounds of oysters and come back a few months
17 later and we have 35 pounds. The bag would be
18 completely filled. We'd have to thin it out
19 and restock it five pounds per oyster.

20 Here's another way of growing bags
21 or growing oysters in suspended bags. This is
22 a very important slide. The picture, the

1 oysters over at the left are natural oysters.
2 The ones at the right are triploid. We
3 proscribe triploidy, and but you can see here
4 what technology allows them to grow much
5 faster, and as a consequence, most of the West
6 Coast operations for growing oysters are going
7 to be precluded from organic certification,
8 because triploidy is the standard here.

9 But nevertheless, we have felt
10 that triploidy is a natural way of growing
11 fish and shellfish.

12 Here are oysters at the seed
13 stage. These oysters are probably a month old
14 or so. They're fed in what are called
15 upwelling silos. In other words, there's a
16 tent to the water.

17 That's cultured algae, that feeds
18 the algae or feeds the oysters. They sit on
19 a screen, in this silo in the water flows from
20 the bottom to the top. Microalgae and
21 microalgae are very important in aquaculture.

22 Here's, I'm going to show a

1 progression of how cultures, algae is
2 cultured. Here's a library where small
3 cultures now grow into bigger cultures, and
4 finally into operations like this.

5 Now you notice this is a red,
6 pigmented culture. Astaxanthin, which is a
7 required nutrient of salmon, is where they
8 actually get their pigment. We will require
9 that the astaxanthin is used, the organic, and
10 this is a candidate operation.

11 Here's a macroalgae. This is a
12 kelp plant. If you go to the ocean here,
13 you'll see kelp growing. This is about a
14 week-old plant.

15 Here's a full grown kelp plant,
16 *macrocystis pyrifera*, which grows here on the
17 west coast, and yes, those are salmon swimming
18 with the kelp.

19 Here's a young abalone about two
20 months old. Here is abalone going off to
21 market and a very happy abalone farmer,
22 because he's about to have this dinner. Here

1 we have catfish. Catfish, until recently, was
2 the biggest aquaculture crop in the United
3 States.

4 It's declined substantially in
5 recent years due to the increased cost of corn
6 and foreign competition. This is a typical
7 catfish farm, 150 to 200 acres. Catfish is
8 big in Mississippi, Arkansas, and Alabama.
9 Here's Rob Mayo's catfish farm. This picture
10 shows how waterfowl is attracted to the
11 habitat that's being provided.

12 We estimate there's probably four
13 or five hundred thousand acres of waterfowl
14 habitat that's been developed in the United
15 States for growing catfish. Here's a catfish
16 nursery. These are catfish that are maybe a
17 couple of days old, a little bit older.

18 Here's one taking feed at the
19 surface. Aeration's very important,
20 particularly in hot summer nights, and this is
21 a farmer who's aerating his pond. Harvest
22 time, the catfish are all crowded. They can

1 be netted, excuse me, I went too fast.
2 Loading into a transport truck, off to the
3 slaughterhouse.

4 Now we have standards for
5 transporting our livestock, and here is a
6 typical fish hauling truck. Not a very good
7 picture. In the back, you'll see oxygen
8 canisters to keep the oxygen. We have
9 standards for maintaining water quality.

10 In one case I'm familiar with,
11 fish were hauled for 36 hours in apparatus
12 like this and greatly stressed. We don't want
13 our fish to be stressed.

14 Here's tilapia. Tilapia is the
15 second-most consumed fish in the world now.
16 Here's a very innovative tilapia-growing
17 operation. The tanks you see in the
18 foreground are growing fish, and in the
19 background you'll see hydroponics. In this
20 case it's okra. This is at the University of
21 Virgin Islands. The flop here in the
22 background and okra here is in the foreground.

1 Now obviously the hydroponic crops
2 can't be certified organic, but the fish can.
3 Here's a conventional high density tilapia
4 operation. We would not allow that high of a
5 density. Another way of growing tilapia, also
6 shrimp.

7 Here's harvesting of tilapia.
8 Obviously, there's a tour going on. That's
9 what you get in the fish market. Here's a
10 shrimp operation where shrimp are being
11 crowded for harvesting, a number of men in the
12 water pulling a net.

13 Now here's a novel shrimp
14 operation in Florida, which probably will
15 qualify once standards are adopted for growing
16 shrimp. Again, organic shrimp in the United
17 States are common.

18 Here's a recirculating system
19 indoors. This is Bell Aquaculture in Indiana,
20 growing lake perch, and here's how they're
21 killing their fish. This would not be legal
22 or allowed under our proposed standards.

1 They're using ice, and as Sebastian mentioned,
2 we have very strict humane slaughter
3 standards, a standard processing line.

4 Now let me go into how our
5 standards are -- the NOSB proposed standards
6 are different. The organic system plan must
7 include an environmental assessment with a lot
8 of detail, and when we proposed this to NOSB,
9 they said you know, we ought to require this
10 for all of our farming operations, fresh as
11 well as aquaculture.

12 We require that aquaculture
13 operations include recycling and consider such
14 things as polyculture and integration. I
15 missed one here.

16 Origin of aquatic animals.
17 Triploidy, as I mentioned, is prohibited.
18 Monosex stocks by chemical and other means are
19 prohibited, and that is a great hardship for
20 the tilapia people, because they want to grow
21 only males.

22 Genetically modified plants and

1 other excluded methods are prohibited. We
2 require traceability. We require that the
3 animals be under continuous organic
4 management, beginning no later than five
5 percent of their total market weight.

6 There is no way that we could have
7 standards written that would cover the
8 multitude of hatchery techniques that are
9 used. Feed must meet the minimum nutritional
10 needs. Antibiotics, hormones, mammalian and
11 poultry slaughter products are prohibited,
12 along with synthetic solvents and processing
13 feeds.

14 Fish meal and oil may not be
15 sourced where government agencies or FAO
16 report the fishery is over-exploited, has a
17 reduced reproductive capacity, old fish and so
18 forth. Fish must be from regions in the world
19 with the lowest levels of persistent
20 biocumulative toxins, and the fish oil must be
21 treated with activated carbon to remove any
22 toxins.

1 Now here's a standard that the
2 NOSB has recommended for the use of fish meal,
3 which is to scale down from a maximum of 25
4 percent initially over 12 years to nothing.
5 This is proposed by NOSB to be on the National
6 List, and the reason for that is there are
7 serious questions, if we can ever get away
8 from some fish meal and fish oil being used in
9 fish.

10 Fish have evolved to eat other
11 fish, in which case the Board would -- when
12 this would come up for sunset review, would be
13 able to continue some sort of use of fish meal
14 without having to go through final rulemaking.
15 Why don't you take it?

16 MR. BELLE: You can tell we're
17 farmers, not presenters. So in terms of
18 aquatic animal health care, there was a lot of
19 discussion in the group about what the, the
20 way to move forward with this is. It's a
21 field which is moving very rapidly.

22 The veterinary community, the

1 pathology community has been involved in
2 aquatic animal health for about 100 years,
3 from a diagnostic point of view. The
4 veterinary community, from the point of view
5 of treating disease on farms from a clinical
6 point of view, has only really been involved
7 in aquaculture for somewhere on the order of
8 about 15 or 20 years.

9 So it's a field which is moving
10 very rapidly, evolving very rapidly, and the
11 science behind it is evolving very rapidly.
12 Again, we have the privilege of having a
13 number of world-recognized experts on the
14 working group when we debated this and went
15 back and forth.

16 We have, we struggled with minimum
17 nutritional needs, and this was really focused
18 around the fish meal/fish oil piece,
19 principally for marine finfish ironically, not
20 salmonids.

21 Marine finfish are species which
22 are not salmon, but they're the marine fish

1 which are being brought into culture now, and
2 many of their nutritional requirements are not
3 currently known. So we established basically
4 a basis when we said you have to try to
5 minimally meet the nutritional requirements of
6 the animal that you're growing. This is your
7 responsibility as a farmer.

8 We had requirements to monitor,
9 record and maintain water quality, to
10 establish biosecurity measures. That's really
11 one of the places where I think the organic,
12 the proposed organic standards are way ahead
13 of anybody else in the world.

14 The biosecurity measures and the
15 way to go at that are probably some of, I
16 think, the most progressive standards in the
17 world.

18 And indeed, in many cases, way
19 ahead of some of our terrestrial colleagues,
20 because it particularly -- we don't have the
21 ability to control, in open systems in
22 particular, what our animals are exposed to or

1 what our plants are exposed to.

2 So we have to think about
3 preventative risk management, as opposed to
4 responsive therapeutic response. The
5 administration of vaccines or other biologics.
6 If they make it through the system, if you
7 will, those will be allowed.

8 Vaccines have turned out to be
9 tremendously beneficial for our finfish folks.
10 When the emergence of effective vaccines came
11 out about 10 or 15 years ago, antibiotic use
12 was significantly reduced in many of the farms
13 around the world. We think that vaccines are,
14 as long as they meet the organic principles
15 and standards, they're a good thing.

16 We wanted to employ a lot of non-
17 therapeutic, non-chemical management methods.
18 So site rotation, fallowing, biological
19 control and integrated pest management. Those
20 were things that we really emphasized in the
21 standards, and there are a whole series of
22 things that you can't do.

1 Obviously administer antibiotics,
2 hormones. You can't sell clinically diseased
3 fish. You can't administer synthetic
4 parasites, parasiticides, sorry. You can't
5 administer medications in the absence of
6 illness.

7 Just as an interesting sideline, a
8 lot of people have a misconception about the
9 use of antibiotics in aquaculture.
10 Antibiotics do not work as a growth promoter
11 for cold-blooded animals. It's just a
12 physiological fact. You can't, in a cold-
13 blooded animal, administer antibiotics and get
14 them to grow any better, unlike poultry or
15 beef.

16 So even if you wanted to as a
17 farmer, antibiotics are not effective as a
18 growth promoter. And then you can't withhold
19 treatment for illness.

20 MR. LOCKWOOD: Here are living
21 conditions, and we get into containment. We
22 must provide for the adequate exercise and

1 swimming behavior, minimize potential injury.
2 Biomass density, it must be appropriate for
3 the animal, and as you saw earlier in one of
4 the slides, organic systems have reduced
5 animal densities.

6 But they're also, you can have,
7 since fish tend to school, you can have too
8 low a density in some cases. We require a
9 predator management plan without the use of
10 lethal measures.

11 Aquaculture facilities. Pond
12 berms must withstand a 100 year flood.
13 Effluents must be assimilated between a 25
14 meter distance of the facility. A waste
15 management plan must include recycling. It
16 must have an escape prevention plan.

17 Net pens in public waters must
18 avoid migratory routes of native species, must
19 grow in strains of native species, be spaced
20 from conventional salmon or conventional net
21 pen operations. The control of fallowing must
22 be by physical or biological and not by

1 chemical means.

2 Nets that are in the water have
3 all sorts of other things that grow on them.
4 We can't use chemicals to do that. We cannot
5 -- we require the use of multiple species
6 outside the pens for recycling, as you saw on
7 the earlier slides, and for the net pens, we
8 require a conversion period of less than one
9 year or one growing cycle. Earth ponds have
10 a conversion of 36 months if prohibited
11 substances have been applied.

12 The bivalve mollusk standards are
13 very complex in themselves. One of the
14 challenges we had was to prove that we have a
15 managed system. Some bivalves are harvested
16 from the wild, and we certainly don't want
17 those coming into organic markets.

18 Again, a detailed environmental
19 assessment with maps is required. An
20 oceanographic technique of defining the
21 hydraulic zone of influence is required, which
22 really describes the whole hydrodynamics of

1 the growing area. We require an expanded
2 sanitary sewer survey. We require hatchery-
3 produced seed only, with one exception.

4 Monitoring requirements for
5 indicator organisms, and we use sentinel
6 animals. In the case of sentinel animals, we
7 require four times a year that these animals
8 be sent off for evaluation of about 200
9 different contaminants that exist in the wild.

10 Chemicals that control predators
11 are prohibited, and we have restrictions on
12 how bivalves are harvested, and we require
13 extensive traceability.

14 Aquatic plants, again earth ponds
15 must not have prohibited substances for 36
16 months. Dissolved nutrients must not exceed
17 the minimum nutrients that are necessary for
18 that particular crop. Berms, boundaries and
19 buffer zones are all required to prevent
20 contamination. Organic starter cultures are
21 required when available. Right now, there are
22 none, but hopefully that will develop.

1 Compost manure is allowed if it
2 complies with Section 205.203, but prohibited
3 in public waters, and again we have continuous
4 organic management after five percent.

5 As Sebastian indicated earlier, a
6 unique contribution from our standards,
7 compared to terrestrial, is the humane
8 slaughter of our fish. We want to minimize
9 stress to the animals and minimize
10 environmental impacts during harvesting.

11 Transport conditions must consider
12 water quality, duration of the trip, density
13 of the animals and metabolite formation, to
14 minimize adverse effects. This, we think, is
15 very critical.

16 Usually before slaughtering fish,
17 they are fasted, and that period must be
18 limited to that necessary to provide good
19 clearance and can be no longer. Finfish must
20 be stunned to be instantly rendered insentient
21 and maintain insentient until death by
22 concussion to the head, which you saw

1 apparatus that does that, electrical stunning
2 or electrocution.

3 Prohibited means of slaughter
4 include ice slurry. You saw ice slurry in
5 that Bell Aquaculture picture. This will be
6 allowed for warm water fish for five years,
7 because the enhanced methods aren't quite
8 there for catfish, for instance.

9 Carbon dioxide suffocation has
10 been a standard practice. That causes stress
11 and we are proscribing it. Suffocation,
12 letting fish die in the air is proscribed,
13 synthetic anesthetics and bleeding without
14 stunning is all proscribed. Ice slurry is
15 allowed for animals that are non-sentient,
16 such as shrimp.

17 Well that ends our presentation,
18 and we've allowed for questions, comments you
19 may have, Mac.

20 CHAIRMAN STONE: Okay, very good.

21 MR. LOCKWOOD: Thank you for your
22 attention.

1 CHAIRMAN STONE: Thank you. I
2 think the images helped me to see, just to
3 have a little bit of a visual to go along
4 with. So just to remind the Board, so that
5 aquaculture working group represented here was
6 appointed by the program back in the day.

7 So they are agents of the USDA, if
8 you will. They work, there's 12 members, I
9 believe George, of the working group,
10 representing the various aspects of the
11 industry. So they've made their
12 recommendation. The program has accepted that
13 and the program has a proposed rule to come
14 out.

15 So we thought that this would give
16 us an image and get our thought process
17 working. So I think that now our work has
18 revolved around the petition materials, which
19 is primarily vitamins, minerals, which are
20 exactly the same as in terrestrial feeds and
21 a few other items.

22 So first before, and I know Tracy

1 or Jean or some on the Livestock Committee may
2 have some questions. It would be nice if we
3 could have a copy of this PowerPoint maybe, so
4 that we can provide that to the committee
5 members or anybody on the Board, just in
6 referencing some of this.

7 So does any members of the Board
8 have specific questions for George or
9 Sebastian?

10 MEMBER FAVRE: I noticed on the
11 terrestrial-based system you have a
12 requirement for the effluent to be assimilated
13 within 25 meters. Describe a little bit about
14 what that process would be for assimilation.

15 MR. LOCKWOOD: Do you understand
16 that?

17 MR. BELLE: Yes. Actually, that's
18 a requirement that applies to all systems,
19 including net pens, and basically depending on
20 what your culture method is or what your
21 containment method is, if you will, there are
22 different ways to handle that.

1 In land-based, you can actually
2 capture solids and compost, and then for
3 dissolved nutrients, there are a number of
4 other ways that you can deal with that. But
5 it's basically, what we're seeing is within 25
6 meters of the facility, the nutrients that are
7 coming out of that farm have to be assimilated
8 or handled some way.

9 So in the case of net pens, which
10 would be the worst case scenario, where you've
11 got an open system, whatever is coming out of
12 that farm has to be assimilated either by the
13 mussels or the kelp or the carrying capacity
14 of that site.

15 So when you, and again, in the
16 case of net pens, when you begin to work a
17 site with a net pen, just like a field when it
18 begins to have cows on it, you begin to have
19 an ecosystem evolve locally in that farm.

20 What we're seeing is that that
21 ecosystem, including the kelp or the mussels
22 that you have on that farm, have to be able to

1 process the nutrients that are coming out of
2 that farm, within the 25 meter distance.

3 MEMBER RICHARDSON: Morning.
4 Question for Sebastian. One of the standards
5 that we need to be thinking about and, you
6 know, just for us to know how we're going to
7 be dealing with these petitions, is that we
8 have to be able to verify that biodiversity on
9 the farm, which is one of our criteria, is
10 being appropriately addressed.

11 That means because we're using,
12 you have wild fish feed included, as well as
13 just the location, which is some distance from
14 your farm per se. How will the issues of
15 biodiversity be able to be measured by the
16 inspector who comes around to do the
17 inspections once a year or whenever?

18 MR. BELLE: You've said -- you've
19 used the key word, which is near and dear to
20 my heart, which is inspection. I'm very
21 involved in auditing of best management
22 practices for a bunch of other groups, and you

1 can have the best standard in the world, and
2 if it's not auditable, it's worthless.

3 So I think that's, and you've
4 actually put your finger on probably the most
5 difficult piece of the standard to audit, the
6 biodiversity piece.

7 There is a requirement -- on the
8 finfish side, there's a requirement about the
9 fish meal and fish oil inputs, and if you
10 actually sit down and kind of do the
11 calculations of what those ingredient levels
12 are, and what the conversion levels are.
13 You'll see that we end up in a place where
14 you're actually producing more marine protein
15 than you're consuming.

16 So that's -- we're actually
17 driving the farmer in a direction where they
18 are actually forced to use other protein and
19 lipid sources in their feeds, and that will
20 mean they will use less and less to
21 eventually, under the current proposed
22 standard, virtually no fish meal and fish oil.

1 So that would, from the biodiversity point of
2 view, that would be one piece.

3 But the other piece, I think, is
4 particularly by forcing open system farmers to
5 go to a multitrophic approach, you're actually
6 -- you can actually document the numbers of
7 species both in the sediment around the farm,
8 and in the water column around the farm, and
9 it's a very -- we have been doing this in
10 Maine for 15 years. It's a very predictable
11 evolution, if you will, of the farm.

12 What happens is initially when you
13 start the farm, biodiversity actually goes up,
14 not down, and you go and basically as a
15 manager of that farm, you are looking at the
16 numbers of species, flora and fauna, both in
17 terms of the numbers of family and taxa, but
18 also in terms of the numbers of individuals
19 with each, within each of those categories.

20 You manage the farm to maximum
21 biodiversity. If you go beyond that, you're
22 actually in the process of crashing that site,

1 and you would have exceeded the standards. So
2 there will be -- you will have to have, as a
3 farmer, you will have to have data that the
4 auditor will look at, to show numbers of
5 species, taxa and what's happening around the
6 farm.

7 MEMBER RICHARDSON: That actually
8 is very reassuring and really interesting, and
9 I was fascinated to see -- one of the
10 questions I had asked during our many
11 conference calls was to see if there were any
12 of the fish farms that were using a range of
13 species being grown on the farm, and that
14 would certainly make a difference.

15 So just to clarify, so before --
16 if we, if there's a fish farm that starts up
17 that's organic, will there be an analysis of
18 the biota in that area prior to the beginning
19 of it, that will then show up in the organic
20 system plan as the months, years go by, so
21 that the inspector can then verify that there
22 have been no radical changes in the benthic

1 biota, and that the combination of taxa remain
2 relatively --

3 I mean they're going to change
4 obviously, but that they remain a relatively
5 sustainably balanced way.

6 MR. LOCKWOOD: The organic system
7 plan requires an environmental assessment,
8 with all of the detail that you just
9 mentioned, before the organic production can
10 begin. It's a comprehensive environmental
11 assessment.

12 MR. BELLE: So you have a baseline
13 to compare it against over the evolution of
14 the farm.

15 CHAIRMAN STONE: Tracy.

16 MEMBER FAVRE: Talk to me about
17 the difference in density between conventional
18 versus organic in, for instance, a net pen
19 system?

20 MR. BELLE: Typically, at least
21 overseas in currently certified organic farms,
22 the densities on organic farms are probably a

1 third of what you would see. Ironically, and
2 this is -- I may open a can of worms here, but
3 ironically, there are many people who believe
4 that net pen systems should not exist, and
5 that they should -- and those finfish
6 production units should be moved to land.

7 The densities in land farms are
8 several orders of magnitude. You might have
9 90 kilos per cubic meter in a land farm,
10 versus 25 in a conventional salmon farm, and
11 versus 15 in an organic farm.

12 So as with anything, there are
13 tradeoffs you have to make as a farmer, and
14 the density issue, I think, is going to be a
15 much bigger issue for land-based farms than it
16 is for ocean-based farms.

17 MR. LOCKWOOD: Tracy, there was a
18 study a few years ago done in Norway of salmon
19 density in net pens, and they stocked salmon
20 at 30 kilograms per cubic meter, at 20
21 kilograms per cubic meter and at 10 kilograms
22 per cubic meter. Some standards in Europe

1 required ten.

2 Turns out that the optimum,
3 measuring a number of variables, was 20. So
4 you can get too low, and of course you can be
5 too high.

6 MR. BELLE: Can I just add one
7 thing? You have to remember in the case of
8 fish, they are social animals. These are
9 schooling animals. So if you have one fish in
10 a cage this size, that is not a very happy
11 fish. It is a very nervous, very stressed out
12 fish.

13 There is a -- there's a minimum
14 density which you don't want to go below,
15 because it is unnatural for them.

16 CHAIRMAN STONE: Zea.

17 MEMBER SONNABEND: Thank you.
18 Switching gears just a bit, we on the Crops
19 Subcommittee have been tasked with approving
20 some of the petitions for aquatic plant
21 culture.

22 The Department has told us that

1 while they're working on aquaculture standards
2 for fish, they're not planning to do separate
3 standards for plants, aquaculture plants, and
4 they think the existing standards should be
5 able to cover plant culture.

6 So we're grappling with things
7 like petition for micronutrients to use, and
8 I'm assuming that aquatic plants is primarily
9 algae and kelps in both open and closed
10 systems.

11 The micronutrients annotation says
12 "must be a documented deficiency." So we're
13 going to be grappling with how do we apply
14 that type of annotation to the situation for
15 organic plants, aquaculture, and could you
16 comment a little bit about how you perceive
17 that would work?

18 MR. LOCKWOOD: Well, I've not
19 heard that the program is not proposing
20 aquatic plants. It would be very difficult to
21 grow many species without having organic
22 microalgae, for instance, or macroalgae.

1 MEMBER FAVRE: Well, they didn't
2 say that they weren't going to allow organic
3 plant aquaculture. They just said they
4 weren't going to write a separate standard for
5 it, and we have to accommodate it into the
6 existing plant standards.

7 MR. LOCKWOOD: Well, we don't know
8 what the program's final rule proposal is
9 going to be. Nobody knows except the people
10 working on it. But I can't imagine having
11 organic shellfish, for instance, without
12 having organic feed to feed those shellfish.

13 So they're probably, I don't know.
14 I would guess that they are going to
15 accommodate that somehow, that we have to have
16 organic feed to grow organic animals.

17 MEMBER FAVRE: Right, they are.
18 But for instance, you know, my example of a
19 micronutrient. How, like do you test your
20 algae to make sure, to see if it's deficient
21 in nutrients, you know, before applying a
22 micronutrient and are there steps so you don't

1 apply too much in an open system so it gets
2 out?

3 Like we're concerned about copper
4 or zinc or something getting into the
5 environment at too great of a concentration,
6 and what checks and balances are there for
7 that?

8 MR. LOCKWOOD: All right. In our
9 proposal, we contemplated -- we did not
10 contemplate open algae growing, other than
11 what you see around the net pens.

12 MEMBER FAVRE: What about kelp?

13 MR. LOCKWOOD: Those are not been
14 providing nutrients, other than coming from
15 nature or from the pens themselves.

16 MEMBER FAVRE: Okay.

17 MR. LOCKWOOD: But the kinds of
18 ponds you saw, that is the type of algae
19 growing that we are contemplating. Yeah,
20 sure.

21 MR. BELLE: Just to take a little
22 different tack on that, there was an awful lot

1 of work put into, at the working group level,
2 put into the standards for aquatic plants, and
3 so, you know, if the Department is choosing to
4 go a different route, at a minimum I would
5 hope they would look to what came out of that
6 working group, and use that to guide how they
7 develop what they're going to propose.

8 I think that would be -- because
9 it was a pretty thoughtful group that included
10 a bunch of folks who had aquatic plant
11 expertise, and they did look at the whole
12 issue pretty carefully.

13 MEMBER FAVRE: Okay. Do you think
14 it was the intention to eventually allow kelp
15 culture in the open oceans to be certified
16 too, or in some sort of controlled way?

17 MR. BELLE: Yeah. No, I think it
18 was. You know, in an open ocean situation, I
19 can't think of a situation where you would
20 actually be physically adding nutrients to the
21 water for those plants. That's not a -- to
22 me, it's a very unlikely scenario, because how

1 would you -- first of all, how would you
2 control that?

3 Second of all, how would you know
4 whether you were having the appropriate effect
5 on the plants in an open system or not? It
6 might be very difficult. It would be very
7 difficult to literally operationalize it, I
8 guess is what I'm saying.

9 MEMBER FAVRE: Thank you.

10 CHAIRMAN STONE: Colehour.

11 MEMBER BONDERA: Yes, thank you.

12 I do want to thank George and Sebastian for
13 what you've presented, and the working group
14 for all of the time and energy, and I don't
15 want to be beating a tired drum.

16 However, I would like to raise a
17 question that I have tried to bring up before,
18 but to be frank, for me at least, isn't, I
19 guess, answered yet.

20 I guess from a background
21 perspective, I'd just like to comment that I
22 am a farmer, but I just want to point out that

1 all of these members of the NOSB that are
2 sitting here, like George said, we're all new
3 in terms of this whole topic.

4 That's one of the reasons that you
5 were invited here and that we're doing this,
6 because after Barry Flamm left, nobody that
7 was on the NOSB had dealt with any of the
8 Aquaculture Working Group's presentations and
9 discussions, even though many members had.

10 That leads to my question, which
11 is related to getting us up to speed. But
12 it's something that came up in both of your
13 comments in different ways, and I think
14 Sebastian, I even wrote down, when he said
15 this is evolving very rapidly.

16 I think that we're all aware of
17 that, but I think that it leads me from a, I
18 think, I don't like to describe myself as
19 conservative, so I won't use that word, but
20 from an understanding perspective, to try to
21 say, to think are we --

22 Do we have our brains around this

1 whole picture well enough to really be making
2 judgments about specific petitions or -- and
3 I guess that I'm slowly getting to the
4 question.

5 But I think the question is what
6 has changed research-wise or information-wise
7 since the working group put forth its
8 conclusions? I think that frankly, I am aware
9 that some things have happened. There are
10 published studies on some of these things that
11 did not exist when the working group did its
12 work.

13 I'm just wondering from the
14 perspective of us all being able to understand
15 this, if you could either direct us or tell us
16 or summarize for us the changes in information
17 and understanding that have occurred, how they
18 could or should be affecting either the NOSB
19 or the NOP or this rule that isn't even
20 finished, in terms of, you know, is there
21 reconsideration necessary of some of the
22 details, that kind of thing.

1 Because you're presenting things
2 that are at this point old, and so -- and I
3 don't know. I hesitate to use the word "old,"
4 but we have a sunset system where five years
5 is considered, we are forced to reconsider
6 things every five years.

7 So I just want to bring that topic
8 up and ask you to respond as you can. Thank
9 you.

10 MR. LOCKWOOD: Let me just touch
11 on a couple of areas, Colehour. The area of
12 fish nutrition is an advancing science, and
13 one of the objectives is, in conventional
14 aquaculture as well as organic, to get away
15 from fish meal consumption for a number of
16 reasons.

17 So the frontier has been to
18 replace more and more fish protein with plant
19 grain proteins, for instance. Right now, the
20 state of the art is such you can grow fish
21 without fish meal, for instance, if we could
22 use poultry byproducts or mammalian

1 byproducts, or synthetic methionine.

2 The simple facts is those aren't
3 compatible with organic principles. So that
4 is one frontier. There are serious doubts, if
5 we can ever get completely away from fish
6 meal, but people are working on that.

7 There certainly are advances in
8 animal health. One area where there are new
9 discoveries is in the growing of aquatic
10 plants, particularly oceanic plants. There
11 are certain trace minerals that have been
12 identified for many, many years, that are
13 essential for plant culture.

14 Another finding is they go out
15 into the, further out to sea. There are some
16 species that have additional trace element
17 requirements.

18 That's one of the reasons why we
19 want to remain flexible with the petition we
20 have for trace elements, that there are new
21 discoveries being made in those areas. Maybe
22 you have something to add.

1 MR. BELLE: Well, the only thing I
2 would say is that, you know, you can draw a
3 line in the sand at any point in history, and
4 look backwards and say things have changed.
5 I think that's true for any field, and one of
6 the things we did, we were very cognizant of
7 when we were discussing and developing and
8 working on the standards, was that the
9 standards had to be constructed in a manner
10 that allowed for innovation, but was true to
11 the organic principles.

12 So we worked very hard to try to
13 recommend standards that achieved that, and I,
14 you know, I mean I'm sure that terrestrial
15 organic sciences is evolving probably as
16 rapidly as aquaculture sciences. I suspect
17 they're both very dynamic, very innovative
18 fields.

19 So we did, we recognized that when
20 we were working on it, but we really tried to
21 make sure that we were allowing for
22 innovation, but not drifting from the

1 fundamental principles.

2 MEMBER FAVRE: Thank you for your
3 forbearance. I'm sure this has felt somewhat
4 like an interrogation. But I think mostly
5 it's that we're so eager to capture the
6 knowledge in your heads while you're here.

7 One last question. I know we've
8 got a very compressed schedule. I noticed in
9 your slide presentation, one of the photos
10 showed a fairly arid landscape in the
11 background of a pond siting.

12 So when you're doing an
13 environmental assessment, are you taking into
14 account the siting of a location, based on
15 things like water use and its impact on the
16 local area?

17 MR. LOCKWOOD: Yes, and a lot
18 more. It's a very comprehensive requirement.

19 CHAIRMAN STONE: Calvin.

20 MEMBER WALKER: Thanks for y'all
21 presentation. Could you share with the group
22 and those who are in the audience the

1 importance of materials that the Livestock
2 Committee have, the importance for those
3 materials being passed, like the vitamins,
4 minerals --.

5 MR. LOCKWOOD: Well, in the case
6 of aquatic animals, we have vitamins.
7 Vitamins are well-established for health
8 requirements, trace elements. We have
9 petitioned for a disinfectant, chlorine,
10 chlorine materials, vaccines.

11 A major revolution in terms of
12 technology has occurred in the last 30 years
13 with the development of vaccines for specific
14 diseases that otherwise had to be treated with
15 antibiotics. But all our petitions, you know,
16 are directed towards raising healthy fish, so
17 that they don't have to be treated.

18 That's a principle of organic
19 management that we've copied, and we want to
20 remain faithful to it.

21 MR. BELLE: I think when we, as a
22 group, looked at what should be petitioned and

1 recall that we were asked to be petitioners,
2 it wasn't our idea to be petitioners. We were
3 asked to be petitioners.

4 We went through the list of things
5 that are currently approved on the National
6 List, and then we looked at what would be the
7 bare minimum that we would need, in order to
8 maintain animal welfare, plant health, the
9 things that we as farmers felt we had a
10 stewardship responsibility about.

11 That was how we came up with that
12 list, and there was a lot of debate about what
13 we should or shouldn't petition for. I have
14 no doubt that we probably haven't got it
15 totally right the first time through. I'm
16 sure we haven't.

17 But it was our best effort at the
18 time to match what was already currently
19 approved for other uses, and then also what we
20 felt we needed as a bare minimum from a
21 stewardship point of view.

22 MR. LOCKWOOD: And when we started

1 out with the list, we had 30 different
2 substances that we were going to petition, and
3 we whittled it down to ten.

4 CHAIRMAN STONE: Jean has an itsy-
5 bitsy, teeny-tiny little-bitty question, I
6 think.

7 MEMBER RICHARDSON: Very small
8 question. As you phase out -- in terms of
9 fish food, as you phase out of using wild fish
10 and fish oil and fish meal, will you be
11 replacing those oils primarily with things
12 like soy and corn and what else?

13 MR. LOCKWOOD: Well, soybean oil
14 is made of omega-6 fatty acids. Fish oil is
15 omega-3 fatty acid. In human physiology, they
16 are entirely different. In fact, there's a
17 number of scientists who believe we have an
18 overload of omega-6's.

19 It's going to be very difficult to
20 find other sources of omega-3 fatty acids than
21 fish oil. There may be algae developments in
22 the future that will do that.

1 But right now, the world supply of
2 fish oil is limited, and if we're going to be
3 selling salmon with omega-6s, it's really
4 fraud, because people expect the healthy
5 components in the fish.

6 CHAIRMAN STONE: Miles.

7 MR. McEVOY: Yeah. I just wanted
8 to clarify a few things that were brought up.
9 Let's see.

10 First of all, we have many old
11 NOSB recommendations that we haven't gotten
12 to, that are older than these aquaculture
13 recommendations that we're still working on,
14 with either rulemaking or guidance that will
15 go forward with notice and comment.

16 Whether it's a rulemaking or
17 guidance, that's part of the process. So more
18 comments will be necessary for some of the
19 older NOSB recommendations.

20 The other thing, on the farmed
21 aquatic plants, when we've looked at that, we
22 already have existing certified organic

1 operations that are certified under the USDA
2 organic regulations, that are doing farmed
3 aquatic plants.

4 We haven't seen a need for
5 rulemaking around this. There might be a need
6 for some guidance around farmed aquatic
7 plants.

8 We'll continue to evaluate that,
9 to see if we need to change our perspective on
10 that. But there's already currently certified
11 organic operations that are doing farmed
12 aquatic plants.

13 Then on the issue of organic
14 aquaculture labeling in the U.S., in the past
15 the NOP had a fact sheet that indicated that
16 if aquaculture products were certified to a
17 third party standard, that they could be sold
18 in the U.S., as long as they didn't reference
19 the USDA organic regulations or use the USDA
20 organic seal.

21 That fact sheet has been removed
22 from the website and archived. We had looked

1 into potentially doing an interpretive rule,
2 which would prohibit the labeling of organic
3 aquaculture/organic seafood in the U.S., until
4 we established organic aquaculture standards.

5 That project has been stalled.
6 We're still considering that possibility, that
7 under the existing regulations, we could issue
8 an interim rule to prohibit organic seafood
9 labeling until we have standards.

10 Then we have taken enforcement
11 action against operations making organic
12 seafood claims that are not certified to any
13 standard whatsoever, and we'll continue to do
14 that.

15 So if you're aware of any organic
16 seafood claims that are being made, that are
17 not certified to any standard, then please
18 file a complaint so we can take enforcement
19 action against that.

20 CHAIRMAN STONE: Okay. Just one
21 really itty-bitty question, Gene. If you'd
22 like to make a couple of closing remarks, we

1 are out of time. But what percentage of these
2 farms do you think might go organic, based on
3 the marketplace, feed costs, changes that they
4 would have to institute to meet the organic
5 standards?

6 MR. LOCKWOOD: Well, that's an
7 interesting question, Mac. Obviously, we have
8 no real knowledge of what will happen. My
9 guess is one or two percent of the farm fish
10 will be, will qualify for organic
11 certification. Of course, that will depend on
12 the species too, and the growing systems.

13 But it's not a large number that I
14 anticipate. The additional costs are very
15 high to meet our standards.

16 CHAIRMAN STONE: Thank you very
17 much. Would you like to make quick closing
18 comments. We appreciate your time to be here,
19 but you're welcome to make a closing comment,
20 if you'd like.

21 MR. LOCKWOOD: No. Not other than
22 we are prepared to work closely with your two

1 committees that are working on our petitions.
2 As we developed, as the NOSB developed their
3 recommendations, they work very closely with
4 the Aquaculture Working Group, and we are
5 prepared to continue to work with you as we
6 can provide information you need.

7 MR. BELLE: I'd just say come to
8 Maine. Come to Maine and visit our farms.
9 Any one of you that wants to come to Maine and
10 go for a bunch of farm tours, more than
11 willing to do that.

12 We'd love to have you down. The
13 farmers would love to have you down, and we'd
14 be delighted to show you through the
15 operations. None of them are organic yet, but
16 we hope some day they will be.

17 CHAIRMAN STONE: All right. Thank
18 you very much.

19 MR. LOCKWOOD: Thank you very
20 much, Mac. We appreciate this opportunity.

21 CHAIRMAN STONE: Very good. So
22 I've got 12 -- not 12:48. That would be 9:48.

1 We're pretty much right on schedule. We'll
2 come back at five after 10:00 for the
3 Livestock Committee. Promptly five after
4 10:00.

5 (Whereupon, the above-entitled
6 matter went off the record at 9:48 a.m. and
7 resumed at 10:06 a.m.)

8 CHAIRMAN STONE: We're going to
9 call the meeting back into session. We're
10 moving into the Livestock Subcommittee place
11 on the agenda. The plan is this will last up
12 until the lunch break. We have several people
13 to present, public comment as well.

14 So as Tracy settles into her seat,
15 I'll turn it over to Ms. Tracy Favre.
16 Livestock Subcommittee

17 MEMBER FAVRE: Thank you, Mac.
18 Livestock Subcommittee, as you might imagine,
19 we've been spending a fair amount of time on
20 aquaculture.

21 But for this meeting, we have one
22 proposal and one interim report. I would like

1 to go ahead with no further delay and turn it
2 over to Mac for the pet food amino acids
3 petition.

4 CHAIRMAN STONE: All right. The
5 Board was petitioned by the Pet Food Institute
6 to allow the essential synthetic amino acids
7 to be allowed in pet foods. Just sort of a
8 brief rundown.

9 So the pet foods currently, there
10 are organic pet foods being marketed. First
11 let me say the program, as Melissa said, the
12 program is working on pet food standards. I
13 think they're going to be out December the
14 3rd.

15 But currently, they're being
16 produced under the livestock standards and
17 labeled under the handling standards. So it's
18 consistent with the existing rule. It's a
19 great way for, you know, to utilize byproducts
20 and add a little value to certified organic
21 agricultural ingredients.

22 MEMBER FAVRE: Excuse me, Mac?

1 CHAIRMAN STONE: Yes.

2 MEMBER FAVRE: Not to interrupt
3 your flow there.

4 CHAIRMAN STONE: Yeah.

5 MEMBER FAVRE: But I think what we
6 were going to do for the petition materials
7 was have Dr. Brines introduce them first.

8 CHAIRMAN STONE: Oh yeah. Excuse
9 me, that's right. Yeah, sorry.

10 MEMBER FAVRE: And then go on, if
11 that is okay with you.

12 CHAIRMAN STONE: Forgot that part,
13 very good.

14 MEMBER FAVRE: Okay, thanks.

15 CHAIRMAN STONE: Thank you. Ms.
16 Lisa.

17 DR. BRINES: Thanks, Mac. I'll
18 keep it brief. The petition for amino acids
19 in pet food was submitted by the Pet Food
20 Institute on January 30th, 2012, and it
21 requests the inclusion of 13 individual amino
22 acids to Section 205.603 of the National List,

1 for use in organic pet food.

2 In support of the review of this
3 petition, the Livestock Subcommittee did
4 request the development of a third party
5 technical report, and that report was
6 completed in 2012, and both the petition and
7 the technical report were posted on the NOP
8 website in advance of the opening of the
9 public comment period for this meeting, and
10 this petition was also on the agenda for the
11 last meeting, although there was not a vote at
12 that time. Thank you.

13 CHAIRMAN STONE: Thank you. Sorry
14 about that. I made a note here for later this
15 afternoon or tomorrow.

16 So the -- in the petition, the Pet
17 Food Institute noted that many of these
18 essential amino acids can be derived from
19 agricultural ingredients, but there are
20 certain amino acids that are not readily
21 available through normal agricultural
22 ingredients.

1 So the committee spent,
2 Subcommittee spent a fair bit of time working
3 on the sentiality. It's known that in the
4 normal manufacturing process, the heating
5 especially of dry dog foods or cat foods can
6 degradate the amino acids that are within
7 these agricultural ingredients, so they may
8 not make it through the processing phase of
9 the, in the production cycle.

10 There also are issues of
11 seasonality and geographic availability of
12 some of these ingredients, to make the organic
13 ingredients to make these pet foods. So
14 through the public comment period at this
15 time, so the committee -- back up one step.

16 So pet foods are regulated. It
17 seems that I would want to get into it. Maybe
18 Dave will respond. So there's a National
19 Research Council that establishes the
20 baseline. It's administered or regulated
21 through AFCO, American Association of Feed
22 Control Officials.

1 So it's odd that it's a little bit
2 outside of a true government regulation, but
3 the states agree to this Association of Feed
4 Control Officials, so that the interstate
5 commerce is facilitated.

6 But each state, because of their
7 legislative and regulatory systems, administer
8 it a little differently, but they do have one
9 standard that they all agree to.

10 So the committee looked at, we
11 looked at lots and lots of pet food labels,
12 ingredient panels on labels, and seemingly,
13 and again maybe public comment and written
14 comment told us this as well, but there's
15 variability of what synthetic amino acids we
16 were seeing on the ingredient panels.

17 Seemingly, the rations that had
18 more grain, foreign grain of some sort, they
19 were adding synthetic methionine or lysine.
20 Several of the products had synthetic
21 threonine. Several had taurine, and
22 carnitine, which I guess is not actually an

1 amino acid but it's also a fifth, sort of
2 often-added synthetic amino acid, if you call
3 it that.

4 So in our investigation, in
5 looking and discussing seemingly the higher
6 end, if you will, pet foods that mimic the
7 natural diet of dogs and cats, had less
8 addition of the synthetic amino acids. But
9 there was one dramatic trend that all cat
10 foods had synthetic taurine added, essentially
11 all cat foods.

12 We obviously didn't see every one,
13 but essentially all cat foods had synthetic
14 taurine because they can't be synthesized by
15 the animal, and they do get overly degraded in
16 the manufacturing process.

17 So in the public comment, written
18 comments, the Pet Food Institute reiterated
19 what was in the petition, that taurine for
20 dogs was also problematic or lack thereof
21 would be problematic, especially in the large
22 breed dogs. Many of the pet foods, they do

1 sort of market as young animals, older
2 animals, large breed, small breed, et cetera.

3 But the large breed dogs were sort
4 of particularly, they have bigger concerns,
5 that those would not be -- manufacturers
6 couldn't have a uniformity in the dog foods.
7 They also asked that, said the methionine,
8 lysine and threonine were the other three that
9 were particularly problematic, again getting
10 back to this availability of organic
11 ingredients.

12 The written comments also referred
13 to that raw diets, that raw diets are not
14 functional, if you will, in the marketplace.
15 Homeowners can in fact, could put together
16 their own raw diet, but in the marketplace it
17 would be very problematic and food safety
18 issues and animal health could be compromised
19 as well.

20 We did receive one public comment
21 of a pet food manufacturer that said they can
22 source and supply these complete diets without

1 synthetic amino acids, and several public
2 comments from individuals that said keep
3 synthetic amino acids out of pet foods.

4 The basic difference here these
5 are not food animals, so is there a slightly
6 different standard. That's why the program is
7 putting together a separate standard, whereas
8 now, as I said, they're being produced under
9 the livestock standard as far as vitamins and
10 minerals, et cetera, and labeled under the
11 handling standards for marketplace as far as
12 made with and use of the organic seal.

13 I guess that's my summary. If
14 there's any questions from the Board.

15 MEMBER FAVRE: Thank you, Mac. We
16 had some conversations about, as Mac
17 indicated, some of the other amino acids, and
18 I think we would prefer to wait on voting on
19 this proposal until after we've had a chance
20 to hear the public comments, if the Board is
21 agreeable to that. Okay. So we will come
22 back to that.

1 Thank you, Mac. Next on our
2 agenda is a report, the interim report for the
3 vaccines made with excluded methods. So Jean.

4 MEMBER RICHARDSON: Thank you,
5 Tracy. I will not be going through the entire
6 report in minute detail, since it's highly
7 complicated. But let me just sort of review
8 where we are headed with this work, in order
9 to help producers be able to know which
10 vaccines are made with excluded methods and
11 those which are not.

12 So just as a reminder is that
13 those producers that are growing livestock
14 must take care of their animals. It's
15 required in the rule, and biologic vaccines
16 are permitted. However, it is important to
17 note that the regulations prohibit the use of
18 excluded methods.

19 However, there is specific
20 reference to vaccines in the section on
21 excluded methods. The regulations provide an
22 allowance for vaccines produced through the

1 use of excluded methods if, and please note
2 the word if, those vaccines have been reviewed
3 and recommended for addition to the National
4 List by the NOSB.

5 The review needs to be conducted
6 in accordance with Section 205.600 in the
7 regulations, and those specify the criteria
8 that the NOSB would have to follow, in order
9 to allow prohibited substances or methods in
10 the ingredients.

11 To date, the NOSB has not
12 recommended any vaccines made with excluded
13 methods to be added to the National List.
14 This provides a real challenge for producers
15 out there, because farmers and certifiers
16 still need to determine if the vaccines
17 they're using are made with excluded methods
18 or not.

19 And as we all know, the general
20 practice is just to use the vaccines, without
21 really addressing those, either by the
22 certifiers or the farmers. So some farmers

1 are using vaccines that probably include those
2 that are made with excluded methods.

3 So in a way, we're not really
4 enforcing what needs to be enforced, and it
5 turns out a lot of it is because of the
6 complexity of the way in which the vaccines
7 are listed, described and presented on the
8 marketplace. So we lack the necessary
9 information.

10 As you know, we've spent several
11 months with a working group that spun out of
12 the Livestock Subcommittee. We've been
13 working with members of -- Patricia Foley from
14 the Center for Veterinary Biologics, and
15 Melissa Bailey from our NOP staff, and Nick
16 Maravell and I from the NOSB, and Scott Updike
17 also from the program, to try to see what
18 light we can shed on this very complicated
19 situation, because there is not a clear
20 understanding of which vaccines the farmer and
21 the certifier could easily identify.

22 Obviously, vaccines are an

1 extremely important of many organic farmers'
2 work protocols. So we put out the working
3 report that went out for public discussion.
4 This is a document that has not gone through
5 the Livestock Subcommittee or been approved by
6 it, because it's only a working group
7 document.

8 We received some -- we came up
9 with a summary of findings, which is what is
10 being put up on the screen there by Michelle.
11 We came up to summarize our findings is what
12 we saw, was that it is you can't identify
13 certain vaccines as being produced by excluded
14 methods with wood, such as chimera, vector or
15 subunit.

16 But these are not always clear to
17 the producer or to the farmer, or to the -- in
18 terms of the marketplace. And we know that
19 the scientific veterinary biologic society
20 product codes of D to DNA vaccines and R to
21 recombinants.

22 However, there is an enormous

1 amount of confidential business information
2 involved in going into minute detail, that
3 would essentially end up in a way with
4 labeling, labeling one product as being "GMO,"
5 which is not a word we use for these, but is
6 one genetically modified and one isn't.

7 And so because there's a
8 considerable amount of manufacturer
9 confidential business information, we could
10 not, the working group could not end up with
11 getting this list that we would like to have
12 for producers, that would allow them to easily
13 identify which vaccines to use and which not.

14 We then explored it further, and
15 as gone into in an enormous detail on our
16 conference calls as to what in fact
17 constitutes an excluded method. It got more
18 and more complex as we went into it in more
19 and more detail, and I do not have my Ph.D. in
20 Cytology or Cytogenetics.

21 So like many of you here, I also
22 have to work through to try to understand what

1 it all means. The bottom line is that the
2 definition of excluded methods really no
3 longer fits, as Zea said, in the GMO Ad Hoc
4 Committee, no longer really fits what our
5 level of sophistication, ten years after the
6 rule, is in place.

7 So we need to almost certainly
8 work on a new definition of excluded methods,
9 and the challenge even becomes more complex,
10 is how far back in history do we go, in order
11 to start the analysis of which vaccines
12 presently on the market are okay and which are
13 not.

14 Do we take a deadline of 1969 or
15 1975 and then work forward from there? We
16 don't know. We didn't come up with an answer
17 to that question. We simply got more and more
18 complicated as the weeks went by, talking
19 about genomes and transposons and stuff like
20 that.

21 So we did come up with two ideas
22 that we would have a proposal that we could

1 look at all technologies that could be used to
2 create a targeted change or mutation in the
3 genome, that would be considered excluded
4 methods.

5 The second proposal, we would look
6 at every technology on a case by case basis.
7 So that if a given technology can induce
8 genetic mutations randomly or targeted, that
9 technology would be allowed, if mutations were
10 random for the material in question. So those
11 were the two sort of general concepts that
12 came out of that discussion.

13 So we sent this material, as you
14 know, out for public discussion and comment,
15 and we got some excellent and detailed
16 feedback from a number of organizations. We
17 got eight detailed responses that had a
18 certain amount of consistency in them, from
19 crop, NODPA, OMRI, MOSA, Northern Vermont,
20 Beyond Pesticides. Cornucopia will be
21 submitting detailed comments later, and some
22 from poultry folks.

1 There was a general consensus that
2 indeed yes, the working group needs to really
3 look at the definition of excluded methods and
4 to continue its work to try to develop a new
5 definition that would be more appropriate for
6 our modern understanding of what excluded
7 methods are.

8 Let's just look at some of these
9 comments. OMRI made an important point, I
10 think, that as we -- assuming we go forward
11 with the working group, manufacturers and the
12 NOP to look at a definition, that we consider
13 the international implications of whatever
14 recommendations that we come up with, because
15 we need to be able to work in the global
16 marketplace, especially with all the
17 equivalencies.

18 I think all of them, all their
19 comments included the need to look at this
20 definition. The Crop Cooperative considered
21 that the second proposal, of taking every
22 technology on a case-by-case basis, they

1 thought that that was the best of our options
2 for the proposals to be looked at, and
3 everyone understood the problem of going --
4 how far back do we go in the development of
5 manufacturing, to look at the excluded method
6 issue. Crop Cooperative commented on that in
7 some detail.

8 Other of the comments, definitely
9 they wanted us to be sure that we, the NOSB
10 definitely understands that vaccines are an
11 important part of the tools used by many
12 producers, and indeed we certainly recognize
13 that.

14 I'm just looking at some of these
15 other comments. Is it MOSA had one. Oh, and
16 OMRI also considered that it was logical to
17 look at, to suggest that a given technique
18 should be declared excluded or allowed, and
19 the International did that. Other things.

20 Okay. There is also the issue to
21 be sure that we keep on the table and that is
22 the concern for the fact that we know that the

1 salmonella vaccine for poultry is genetically
2 modified vaccine.

3 We're aware of that, and that that
4 certainly is one of the serious issues that we
5 have to keep in mind, no matter what
6 recommendations we come up with over the next
7 few months.

8 So where does this leave us? It
9 leaves us that we still don't have a good list
10 for producers to be able to determine whether
11 the vaccines they're using are made with
12 excluded methods or not.

13 We heard the other day that dairy
14 farmer Strauss, who has a, I believe he has a
15 closed herd, manages to determine by his own
16 actions, to determine which vaccines are
17 appropriate or not made with excluded methods.

18 Although I didn't ask him in
19 detail exactly how he's doing that, we know
20 that some farmers try to do it, but the
21 majority still it's so complicated that they
22 can't do it. So we still don't have that list

1 and we need, we do need it. It is something
2 that's very important.

3 We hope over the next few months
4 that we can continue work with manufacturers,
5 to look at how such a list may be developed,
6 and also to work on the how we can develop an
7 updated definition of what made with excluded
8 methods really means, and probably some of
9 that work will overlap with what Zea's group
10 is doing with GMO, because obviously there's
11 an overlap there in how we'll come up with a
12 definition over the long run.

13 So hopefully this working group
14 report can now be absorbed and be part of the
15 work plan of the Livestock Committee over the
16 next few months, as we see what, if anything,
17 we can do to move this along more quickly.

18 Melissa, is there anything from
19 the program point of view that you'd like to
20 add at this point.

21 MS. BAILEY: Sure. Thanks Jean
22 for that background and information. So last

1 night at dinner, Jean said to me well Melissa,
2 you're going to come up with something
3 brilliant to say on this topic tomorrow, and
4 I said well, I'll think about it.

5 So I don't think I have something
6 brilliant, but I guess what I would share with
7 you is my experience working on this group,
8 which has been a collaborative process, and
9 this topic area is something that I often have
10 posted in my office, which is nothing is ever
11 simple.

12 As we know, and if you look at the
13 information in the interim report, this is a
14 technically complex and complicated issue, and
15 I guess I would have three points that I'd
16 like to share with everybody, the first being
17 about the process; the second about
18 implementation; and the third being about
19 collaboration and kind of where we go next.

20 So the first on the process is,
21 you know, we've been working as a team on this
22 issue, on calls kind of around the table. I

1 think it was appropriate to move into this
2 phase, to kind of break out from that vacuum,
3 put something in front of the public for them
4 to react to, rather than trying to solve this
5 issue independently in this group.

6 So from that standpoint, I'm glad
7 we got something out that folks can react to.
8 I imagine people will want to provide us
9 additional feedback, given the technical
10 complexity of the document. We've worked with
11 people all along.

12 We've had great collaboration from
13 some of the poultry folks, kind of letting us
14 know where they're at in their production,
15 what kind of vaccines they're using.

16 So I would just like to say that I
17 think this, and I hope it continues in the
18 spirit of collective problem-solving.

19 The second thing about
20 implementation is wherever we end up on this
21 issue, I would say the key is going to be
22 implementation. Whatever we do, I would hope

1 that we try to embrace the concept of sound
2 and sensible implementation, that we do so in
3 an orderly fashion to minimize the burden on
4 the producers.

5 As Jean said, the ideal outcome
6 would be some sort of list, so they're not
7 pouring over labels on vaccines, which can be
8 quite burdensome and kind of against the
9 principles that we're trying to move toward.

10 The consideration of foreign
11 operations is important, as Jean mentioned.
12 So people operating -- this is a global
13 program. People operating in other countries
14 may have additional concerns from their own
15 foreign governments about what are being used.

16 So that should be considered, as
17 well as I appreciated Mr. Strauss' comment
18 yesterday about his dairy operation. We'd
19 like to learn more about that and what
20 verification is going on.

21 But we do need to remember that
22 this will cross species as well. So dairy,

1 poultry, goat, sheep. All of those things
2 need to be considered in whatever
3 implementation we do.

4 The last point is on sort of
5 personnel and collaboration. So I do want to,
6 even though he's not here, give a great thanks
7 to Scott Updike, who's on my staff. He's
8 done, has a background in some of the
9 technical aspects of this issue and has been
10 really able to provide that input to the
11 group. So that's been valuable.

12 The working group members,
13 including the staff from APHIS, and in terms
14 of next steps in this collaboration, I think
15 having the Livestock Subcommittee take a look
16 at the interim report, since this was sort of
17 a passthrough, just to get it in front of the
18 public, would be a logical next step, to have
19 those members be able to react to some of
20 what's in there, as well as to continue to
21 work with the GMO Ad Hoc Committee on their
22 work about sort of what those excluded methods

1 mean.

2 We'll also put this in front of,
3 as I do with a range of things we worked on,
4 to the USDA Biotech Coordinating Group, who is
5 a coordinating group across the Department, of
6 people involved in biotech issues. So any
7 input we get from that group could be shared
8 as part of this process.

9 So that's all I have to say, and
10 thanks very much for the NOSB's participation,
11 Nick as well, on this issue.

12 MEMBER FAVRE: Thank you, Jean and
13 Melissa. I think that's actually a good plan
14 for the Livestock Subcommittee to take it up.
15 I'm fairly certain we're all going to need
16 further advance degrees and a science to
17 English dictionary to be able to interpret the
18 report, but we will do our best to do that.

19 That concludes the report from the
20 Livestock Subcommittee at present. Yes.
21 Nick, you had a comment? Go ahead.

22 MEMBER MARAVELL: Yes. I'd just

1 like to acknowledge some of the comment we got
2 said that we should have additional
3 stakeholders participating in this process,
4 and what I want to say is that this is not a -
5 - this group here is not an NOSB committee or
6 ad hoc committee.

7 This is a working group of the
8 Department, and I fully endorse additional
9 stakeholder participation. That would have to
10 come at the appropriate time in the
11 appropriate way.

12 Sometimes industry forms its own
13 working groups, which I think would be fully
14 appropriate in my personal opinion. But I
15 have not checked that out with the Department,
16 and the industry may wish to approach the
17 Department and see how they could best
18 participate in this working process.

19 But so far, I've been encouraged
20 that we've gotten nothing but positive support
21 from industry in trying to address this issue,
22 and they have a lot of the information that

1 would be helpful to sorting it through.

2 So I simply pass that comment onto
3 the Department and to the Board that, you
4 know, we may find that's an appropriate thing
5 to do.

6 MEMBER FAVRE: Thank you, Nick.

7 CHAIRMAN STONE: Thanks, Tracy. I
8 believe we have nine people signed up for
9 public comment in this section of the agenda.
10 So I have Leslie Hancock is up first and Dave
11 Carter is on deck.

12 Public Comment/Livestock Subcommittee

13 MS. HANCOCK: Well thank you so
14 much for allowing us to make public comment
15 here as we get the presentation together.
16 Just a brief history of who I am and why I'm
17 speaking here today.

18 I'm a veterinarian from the
19 University of Georgia, and I have a
20 postdoctorate in clinical nutrition from the
21 University of California-Davis. I have ten
22 years in clinical experience and six years in

1 cell animal health nutrition, and I'm
2 currently the Director of Global Scientific
3 Affairs and Research and Development with
4 Natural Balance Pet Food.

5 Thank you for inviting the
6 comment, so I can share with you why I feel it
7 is incredibly important that amino acid
8 supplementation is permissible in all pet
9 food.

10 So certainly we recognize that
11 methionine is an essential amino acid for dogs
12 and cats, and if you're paying attention to
13 the recommendations by the NRC and
14 idiosyncracies within food, the requirements
15 are going to be elevated over the next year.
16 So I'd encourage you to pay attention to that,
17 as well as taurine.

18 We know taurine is essential in
19 cats. Culmination of data over the last ten
20 years shows taurine is also conditionally
21 essential in dogs.

22 It's been staged from a non-

1 essential amino acid to a conditionally
2 essentially amino acid, without which we'll
3 see heart disease, blindness, reproductive
4 failure and death, and as a veterinarian, I've
5 seen many, many sick animals and I've
6 nutritional deficiency far too many times. We
7 know better. This is a preventable disease.

8 All right. So how can we have
9 complete and balanced pet foods that have
10 complete -- that meet those requirements set
11 forth by regulators, and we still see disease?

12 The issue there is we're trying to
13 meet litmuses for each individual ingredient,
14 as opposed to looking at -- I know this is a
15 crazy -- a holistic approach to nutrition,
16 where we look at how the different nutrients
17 interact with each other.

18 So we're seeing trends in pet food
19 formulation, what the consumers are looking
20 for. Whole grains, high fiber. Guess what?
21 That reduces sulfur amino acid
22 bioavailability.

1 We're using different ingredients,
2 compared to what traditional AFCCO
3 recommendations and NRD, and the research and
4 what the NRC based their recommendations upon.
5 We're using ingredients with lower
6 bioavailability.

7 We know that meats, such as
8 ruminant, beef, venison and bison have lower
9 sulfur amino acid content and lower
10 availability. So we need to take this into
11 consideration.

12 When you're looking at a formula,
13 it might meet the requirements on paper, but
14 what happens if you put it into the chaotic
15 system of the body? The biology is very
16 different.

17 Vegetable diets, a trend away from
18 byproducts. Guess what? That's where these
19 sulfur amino acids, are highest concentration,
20 the heart, the liver, lung, brain. Certainly,
21 as the trend goes towards formulating for
22 higher protein diets, that higher protein also

1 relatively increases the methionine
2 requirement.

3 So we have a very complex system
4 here that's not being taken into consideration
5 when you look at have you reached a benchmark?
6 Have you formulated to meet a diet that hits,
7 you know, .33 percent methionine. Yep, I hit
8 it. The science is going to be fine.

9 We know that doesn't work. In the
10 mid-80's, a diet was formulized, a standard
11 AFCO diet, and guess what? We saw lots of
12 nutritional deficiencies, zinc deficiency,
13 copper deficiency, amino acid deficiency.

14 So we need to be able, as
15 formulators, to look at a diet and understand
16 the way we're formulating, understand the
17 biology of the different animals and ensure
18 that that one meal is going to provide
19 consistent nutrition and not hurt the animal.

20 The pictures of the dogs here, and
21 you notice they are all large breed dogs,
22 these are cases that I treated myself from a

1 taurine deficiency on complete and balanced
2 dry, expanded diets. So I want you to take
3 that into heavy consideration as we this
4 disease all the time.

5 My fear is my colleagues, my
6 friends that are still in practice at
7 universities, if we prohibit sulfur amino
8 acids from being in pet food, they are going
9 to see more disease. They see it enough. It
10 rarely comes to the attention of the
11 nutritionist, because the cardiologists deal
12 with it enough. They know how to handle it.

13 All right. We know that there was
14 a major problem in commercial kibble using an
15 exotic meat and a whole grain back in the late
16 90's. Sorry. So that's my four minutes. I
17 tried to get through it, but again to
18 summarize, we have to prevent disease and
19 suffering.

20 We see it and I think it would be
21 a huge mistake to prohibit sulfur amino acids
22 in pet food, and I won't show you the case

1 reports of ones that I've seen.

2 CHAIRMAN STONE: Thank you. Is
3 there questions from the Board? Jay.

4 MEMBER FELDMAN: I'm trying to
5 sort through the technical review document
6 that we received in look at this, and they do
7 cite manufacturers who sell cat food made
8 without synthetic amino acids, and then there
9 is a company there that apparently does this
10 as well, that actually produces, I guess, a
11 high quality protein, animal protein product.

12 So when you're talking about
13 adverse impacts on pets, are you talking about
14 specific diets, or are you talking about high
15 protein diets as well, animal protein diets?

16 MS. HANCOCK: Yeah. So we do see
17 a trend. I believe one of my colleagues has
18 a report of the taurine status, plasma taurine
19 status and whole blood taurine status on
20 different diets of different protein level
21 inclusions.

22 But you know, you start doing a

1 product comparison when you try to look at it
2 outside of the box that way. I know that
3 there are certain diets that we do have more
4 attention, because we have seen an increased
5 number of dogs with taurine deficiency on
6 them.

7 But as a general rule, as you
8 increase protein intake, because you need
9 methionine and the methionine products of the
10 sulfur donors or methyl donors to run the
11 metabolic protein metabolism, those
12 requirements are duly increased.

13 You can see how if you meet the
14 benchmark, you know, of accrued protein
15 requirement, you don't have a sliding scale
16 for all the other nutrients. Does that make
17 sense?

18 MEMBER FELDMAN: Thank you.

19 CHAIRMAN STONE: All right, thank
20 you. I guess I should declare an interest in
21 going through this and evaluating this
22 material.

1 I recognize that my wife and I
2 feed two Great Pyrenees an organic diet that
3 has synthetic taurine added. Dave, you're up,
4 and Sharon Sherman is on deck. So before you
5 start, Dave, and I'm sorry I didn't do this
6 before for Leslie.

7 The green light goes for three
8 minutes; the yellow light goes for one; and
9 then the obnoxious red beep.

10 MR. CARTER: All right, thank you.
11 Just figure thanks to you friend, a little
12 levity here. Mr. Chairman and members of the
13 Board, I'm Dave Carter, a refugee of this
14 group. For a time with National Bison
15 Association, itinerant consultant here today
16 on behalf of the Pet Food Institute.

17 I don't want to go through the
18 whole ten-year history of where we've been,
19 but let's go to 2008, when the NOSB
20 unanimously adopted the Pet Food Task Force
21 report, and as a part of that, there was a
22 list of ingredients that would likely have to

1 be petitioned.

2 On that was essentially the list
3 of amino acids, and that was really the
4 genesis for us taking a look at if those amino
5 acids were going to have to be petitioned,
6 could we petition them as a category,
7 particularly knowing that the pet food
8 standards, when they come out later this year,
9 would be in the livestock area, and in
10 livestock you are allowed vitamins and
11 minerals which FDA allowed.

12 So that was sort of the genesis of
13 trying to approach that as a category.
14 Obviously, the TAP report and the Livestock
15 Subcommittee took a different view of that,
16 much narrower view, and the recommendation for
17 taurine only for cats came forward.

18 When we saw that, we convened,
19 then, a group of nutritionists and
20 formulators, to really say okay, if it's not
21 going to happen as a category, what really are
22 the ones that we got to, got to have, that we

1 just are so essential that we would otherwise
2 be compromising the health of the pets?

3 That's where we came up with the
4 taurine, the methionine, the lysine and the
5 threonine as really the ones that are critical
6 to being able to make a complete and balanced
7 formulation.

8 I just want to go through the TAP
9 report. There were, you know, several areas
10 there. You're right. They did cite some
11 companies that make complete and balanced
12 formulas.

13 But if you look at those
14 companies, they are either a conventional
15 product or organic and are very limited for a
16 specific life stage of a specific species.
17 They don't have a full range.

18 That's because specifically when
19 it comes to formulating pet food, the organic
20 industry has a lot more limited than the
21 conventional. It comes down to the fact that
22 there just isn't certified organic meat meal

1 out there.

2 Chicken meal is the basis for a
3 lot of pet food formulations. It has a lot of
4 bioavailability. It's very dense. When you
5 formulate with fresh meat, you're starting off
6 with a product with 80 percent moisture, a lot
7 more seasonality. It's very difficult.

8 The taurine for dogs, I think Dr.
9 Hancock mentioned that, that there's a lot of
10 literature that talks about large breed dogs
11 really having problems if they don't have
12 taurine in there. The amino acids have to be
13 bioavailable, and if you look at our written
14 comments, it goes through yes, the TAP report
15 lists the food sources.

16 But we go through there and talk
17 about they're either not available, or they
18 are not good sources, and that's very
19 difficult. It talks about the raw diet, and
20 if you look in the TAP report, it talks about
21 the fact that pets can die sometimes when they
22 eat that. That's not really a reason to move

1 forward on that.

2 So formulators have to be able to
3 do the right balance or the right nutrients
4 for all sizes, for all life stages for both
5 species. That's where we feel that those four
6 amino acids at least provide the tools for
7 them to be able to do that.

8 We have to have a chance. Pet
9 food owners or pet owners have one chance
10 every day, one or two chances every day to get
11 it right. Those animals get all of their
12 nutrients from that bowl of food.

13 It's not like us, that if we eat a
14 product and it doesn't have everything we
15 need, we'll be eating a banana or an apple or
16 something later on in the day. That has to be
17 a complete and balanced nutrient-dense diet.

18 Then finally, growth in the
19 organic pet food sector really helps all
20 organic farmers. As a livestock producer, you
21 can't make a living selling only organic
22 tenderloin strips and ribeyes.

1 Unless you can get some premium
2 out of hearts, liver, trim, those other
3 things, you can't just make a go at it. So
4 it's very important for the pieces of the
5 puzzle. Thank you.

6 CHAIRMAN STONE: Thank you, Dave.
7 Questions. Tracy?

8 MEMBER FAVRE: Is the situation on
9 amino acids mitigated at all you combined a
10 canned food with like a dry kibble?

11 MR. CARTER: The difficulty is the
12 most in the dry kibble, yeah, because of the
13 heat processing and the degradation. That's
14 where if you look at some of the products,
15 that it's very either limited, that it's not
16 for all life stages, or it's simply in a
17 canned product. So yeah, the degree of
18 difficulty is harder in a dry diet.

19 MEMBER FAVRE: Just to clarify.
20 So you're saying if you combine a dry and a
21 canned together, you sort of offset some of
22 the impact of that?

1 MR. CARTER: You offset some of
2 the impact of it, yeah.

3 CHAIRMAN STONE: Francis.

4 MR. CARTER: Some is the operative
5 word.

6 MEMBER THICKE: Thanks Dave. I
7 was looking on the petition. On page 44, it
8 lists the various ten essential amino acids,
9 and it has sources. I see that for threonine,
10 methionine, lysine that are plant sources.
11 Can you explain what the difficulty is in
12 using those?

13 MR. CARTER: Well, if you look,
14 you know, those, some of the sources that they
15 have on there are the meals, the meat meals,
16 chicken meals that we have. Gluten is a
17 source of those, but if you take a look at our
18 written comments, we talk about the balance of
19 that, it's very difficult to achieve the right
20 balance.

21 You know, the problem that we have
22 is that not only do you have to have those in

1 there; you have to have the right balance of
2 all of those, and that's the degree. The
3 other thing is that right now, and the reason
4 that we have focused on the NRC and not AFCO,
5 is that NRC is the basis for those.

6 There's six different tables in
7 the NRC that talk about different species and
8 different life stages. AFCO is being updated
9 as we speak to reflect the 2006 NRC. A lot of
10 what is in AFCO right now even goes back to
11 1974 NRC. It's being updated.

12 If you take a look at the proposed
13 updates, those levels are being increased, and
14 that's part of the reason we say yes, we need
15 to have that, because the levels of lysine and
16 methionine and threonine are being increased
17 under the new proposed AFCO regs.

18 MEMBER THICKE: So it's easier
19 just to balance those if they're synthetic,
20 because you can just put the right amounts in.

21 MR. CARTER: You can put the right
22 amounts in and achieve that balance you need,

1 because one some of the amino acids, not only
2 do you have to hit the minimum, but if you go
3 too high on them, you start to run into some
4 problems as well.

5 So it's a real delicate balance
6 these folks are doing that and when they're
7 dealing with the, you know, the whole muscle
8 meats and those types of things rather than
9 the meals, it's really a challenge. By the
10 way, welcome to the NOSB. Congratulations on
11 your appointment.

12 CHAIRMAN STONE: Thanks, Dave.
13 For those of you who weren't aware, Dave's the
14 former chair of this group. So again, I have
15 appreciation for what this little thing means
16 here. Sharon Sherman is up, and Mohamed Mousa
17 is on deck.

18 MS. SHERMAN: Thank you very much
19 for the opportunity to meet with you this
20 morning, and I want to tell you how much we
21 appreciate it.

22 I've been a member of the Pet Food

1 Task Force since 2004. It's been my passion.
2 Animals are my passion. In 1978, my husband
3 and I co-founded the first natural food pet
4 company, and we used as guidelines to create
5 our natural food the AFCCO guidelines, because
6 we were of the mind of do no harm.

7 So we followed that information.
8 Our ingredients were a little bit different,
9 in that we used no byproducts, that we wanted
10 to have whole foods, and we wanted to use
11 chelated minerals, an alternate source of
12 minerals, and keeping in mind it was always do
13 no harm.

14 With the complete understanding,
15 as Dave mentioned, this is their food. Like
16 an infant ingests this formula for a certain
17 period of time, or lucky enough to be breast-
18 fed. So it's a certain period of time.

19 But these animals, it's their
20 entire life. They must have a supplemented
21 diet, because they simply do not have the
22 ability to synthesize some of the amino acids.

1 We seem to learn by our mistakes.
2 In the 80's, many people came home. They
3 would have the spontaneous instances where
4 their cats had heart attacks or they were
5 going blind. In the 80's, they discovered
6 they have a taurine deficiency.

7 So automatically, it was the
8 demand of AFCCO to add taurine to commercial
9 pet food. That was a mandate and we did it,
10 and it relieved those symptoms.

11 So I'm here today to basically say
12 the same situations exist today. We must have
13 these nutrients. Everybody knows that organic
14 is the gold standard and they moved towards
15 that. Why did they move towards that?
16 Because they want a better diet for their pet.

17 A lot of people are having results
18 with the change to the organic diet. But we
19 just need to make sure that they're able to
20 have the essential nutrients, so that we don't
21 have a blow-up with a person that's committed
22 to using organic pet foods.

1 So I'm just asking you to please
2 reconsider and study the use of the essential
3 amino acids in pet foods. Thank you.

4 CHAIRMAN STONE: Thank you. Are
5 there any questions? Sharon. Harold?

6 MEMBER AUSTIN: If the proposal
7 that we've presented were to go through as
8 it's written today, what impact would it have
9 on your business and other organic
10 stakeholders such as yourself, long-term?

11 MS. SHERMAN: Not having the amino
12 acids? Is that what you're saying?

13 MEMBER AUSTIN: Yes.

14 MS. SHERMAN: Well, we're of the
15 mind do no harm. I don't know karmically
16 whether I could actually create a food that I
17 would know, that there could be issues,
18 because how can you do something like that?
19 I mean knowingly, you know, with all the
20 information, all the scientific data, how can
21 we do that?

22 You know, if the people knew that

1 the gluten was contaminated, would they have
2 put it in the food, you know? There's so many
3 examples. If they knew they needed taurine,
4 they would have put it in beforehand, without
5 so many cats dying and becoming blind, you
6 know, or other issues.

7 CHAIRMAN STONE: All right. Thank
8 you very much, Sharon. Mohamed is up and
9 Daniella Steiner is on deck.

10 MR. MOUSA: Good afternoon or good
11 morning, ladies and gentlemen of the NOSB, and
12 Mr. McEvoy and NOSB, thank you very much for
13 letting me talk.

14 I have so many thousands of
15 chickens I couldn't be here today, so they
16 send me here to talk to you. I also need some
17 methionine, like everybody else before me.

18 Methionine is very essential amino
19 acid, like what you see. Its component is
20 hydrogen, nitrogen and carbon and sulfurs and
21 oxygen. There's two types of methionine
22 manufactured, the L-methionine and hydroxy

1 analog. It's a limiting amino acid.

2 We used to be at four point, four
3 pounds per ton of feed. It's .2 pounds from -
4 - .2 from the ration. It's very, very
5 essential to the welfare of the birds.

6 History. The NOSB recommendation
7 were at four bound, when to two bound from
8 October 1st, 2012. One thing happened here
9 that who made the recommendation or applied
10 the ruling missed a big, big factor in the
11 animal production, and animal health in
12 general.

13 Birds have different need in
14 different stage of life. That was neglected
15 here, and I ask the Board and I ask the
16 program to correct it. It's really not good.
17 We see a lot of bad things, and animal welfare
18 is a major, major concern of mine and other
19 producers.

20 The start-up birds needs a higher
21 level of methionine. Hence during production,
22 sexual maturity, I can tell you right now I

1 have birds that are four weeks behind in their
2 maturity. They eat their feather. Birds at
3 17 and 18 weeks don't have any feather in
4 their necks, don't have feather in their tail.

5 I don't want to give the pictures
6 there because it's really depressing.

7 Methionine is very, very essential to the
8 birds, because the birds is omnivores. It's
9 just like cats and dogs. If you don't feed
10 them their amino acid, it's a sulfur amino
11 acid. It's restricted. It's a limiting
12 factor. All the other amino acids will work
13 to the level of methionine.

14 Just like you have a barrel and
15 you make a hole in the middle. You're not
16 going to fill that barrel with water. You're
17 going to fill only where that hole is.
18 Methionine is very important for the
19 bioavailability of the other levels of amino
20 acids.

21 So the heart, pancreas, immune
22 system, feather follicle. Birds like, I look

1 at them as a very beautiful young lady. If
2 they don't have their feather, you see, you
3 look at them, they feel very sad. I see that.
4 I completed today 50 years and five days
5 working with chickens. I'm 59 years old, so
6 I started from very, very young age.

7 Well what do we need to do. I ask
8 the Board and the program, I'm not asking for
9 more methionine, but I ask it only for putting
10 the word average, and let me handle that and
11 get the certifier to talk to me when he comes
12 to audit my farm. Keep it for five years.
13 Encourage research. Let's get some science
14 and data to support future regulations.

15 I was approached by two
16 scientists, two universities to serve in a
17 board for overseeing their research. There's
18 two over here now is was working with USDA,
19 was getting some grants, and we will help
20 them.

21 CHAIRMAN STONE: All right. Thank
22 you very much. If there are questions?

1 Calvin.

2 MEMBER WALKER: Thank you, Dr.
3 Mousa. Could you share again some of the
4 impact of the step-down on your operation, as
5 far as animal welfare?

6 MR. MOUSA: The birds have a very
7 minimum recommendation or requirement they
8 need, according to the other ingredients.
9 It's a holistic approach for what we put in.

10 Organic ingredients, which it will
11 be soybean meal and corn. That's, you know,
12 there's not too much stuff available for
13 organic we use, contains a high level of
14 protein.

15 So when we use, let's say the
16 maximum from everything, and we still have
17 deficiency, what happens, the birds cannot
18 grow when there are babies by the same rate
19 which they are supposed to grow. The other
20 thing is during the sexual maturity, from 12
21 to 18 weeks, the birds need that amino acid.

22 Not only methionine, but the

1 better of amino acid, and because methionine
2 is a very limiting amino acid, they can't do
3 it. So the oviduct and the ovary developed
4 was less.

5 The oviduct and the ovary is the
6 machine which makes the eggs, which give the
7 production for the farmer. The farmer don't
8 get the eggs. The bird's behavior, I can tell
9 you, I've seen birds very aggressive. When
10 feather falls from a high place from the
11 perch, the birds, 100 or so, jump on there,
12 try to pick up that feather.

13 In our houses, there is not a
14 single feather in the floor. The birds eat
15 the feathers from each other and from the
16 floor also. I'm really asking for the animal
17 welfare issue and not the production issue.

18 This recommendation over here are
19 calculated by Dr. Willy Williams, and this is
20 the bare, bare minimum for requirement of the
21 bird. I would like to give him his thanks for
22 his help to me on that.

1 CHAIRMAN STONE: Wendy.

2 MEMBER FULWIDER: What about
3 ammonia in the buildings?

4 MR. MOUSA: Wendy, I thank you for
5 that questions. We have Amish contractor
6 growers in Indiana, and when we visit their
7 farms, and forgive me, because I am going to
8 tell you that with sadness, I've seen a lot of
9 ammonia level exceeded the animal welfare
10 guidelines of what we use, and also I've seen
11 several blind birds.

12 You know, in winter time, I call
13 those guys and I ask them to what I call it
14 perch the house. They turn all the fans on.
15 Temperature sometimes goes to 50 degrees and
16 less on the birds. There are other birds that
17 lost most of their feathers. I don't like
18 that at all, and sometimes they pile and
19 suffocate.

20 CHAIRMAN STONE: Nick.

21 MEMBER MARAVELL: Yes. Could you
22 just explain why it's not necessary to make a

1 recommendation for the first 17 weeks?

2 MR. MOUSA: Can you repeat the
3 question, please?

4 MEMBER MARAVELL: I looked at your
5 -- if you want to go back to your
6 recommendation slide. Just explain why it's
7 not necessary to make any methionine
8 recommendation?

9 MR. MOUSA: No, it is very
10 necessary. When I start, when I start my
11 presentation, I said from baby chick up to 18
12 weeks, it's different stage of growth. But
13 over here, that's when the birds suffer the
14 most, because they start to develop their egg
15 machine, you know. That's when they need it
16 the most.

17 MEMBER MARAVELL: But did you have
18 any specific recommendation, because the feed
19 is different during the first 17 weeks as
20 well?

21 MR. MOUSA: Yes. The
22 recommendation will be as it's stated, it will

1 be about 2.95. But during the 17 weeks, let's
2 just take from 12 weeks, because that's the
3 time we start to increase a little bit.
4 Between 12 and 18 weeks, you come to about the
5 middle, and it goes up to approximately 2.8,
6 2.7 and that, and all that, the added
7 methionine will depend on what's in the
8 soybean meal and also in the other
9 ingredients.

10 CHAIRMAN STONE: Thank you,
11 Mohamed.

12 MR. MOUSA: Thank you very, very
13 much. Appreciate it.

14 CHAIRMAN STONE: Daniella Steiner
15 is up, and George Kimbrell is on deck.

16 MS. STEINER: Hi. My name is
17 Daniella, and I'm just a regular person. I'm
18 not a scientist. I don't work in the food
19 industry. I don't usually talk to people in
20 suits sitting around the table like that, but
21 I eat every day, usually a couple of times.

22 I'm really interested in what my

1 food is and where it comes from, and I feel
2 like I'm more curious about it than most of
3 the people I know. Even I don't have time to
4 read all the articles, and I don't understand
5 all the science behind it.

6 I don't have a car. I'm not going
7 to go to all the farms that my food comes
8 from, so I have to trust somebody to give me
9 appropriate information.

10 I have an awesome co-op. I really
11 trust their guidelines there. They send
12 people to all the farms that, the farmers from
13 the farmers market there, and they actually
14 visit them several times a year.

15 So I totally trust that, and I
16 feel like for an advisory board and a
17 regulatory board, that I want to really trust
18 the guidelines that you're laying out, and
19 that it's not advertising, you know, that it's
20 actually just information.

21 Because advertising is to give you
22 permission to believe what you really want to

1 believe, even though it's probably not true,
2 right. I just want the real information. So
3 if I'm at the store and I'm thinking about
4 buying some eggs, and there's two cartons of
5 eggs, and one is \$2.50 and one is like \$6.00,
6 I'd rather buy the cheaper one if it's just as
7 good. And look, they both say they're organic
8 and they have access to the outdoors, right?

9 But the one, the access to
10 outdoors is a little tiny door in the way back
11 of the henhouse that none of them are ever
12 going to find, and the outdoors, it's like a
13 little tiny patch of dirt, which like maybe if
14 they took turns, they could each go out there
15 for like two minutes ever, right.

16 But in my mind, there's a picture
17 on the front of the carton. It's a third,
18 it's outside, and that's what I'm picturing.
19 And so, and that's probably the reality of the
20 expensive eggs. But why am I going to spend
21 three or four dollars more if I'm led to
22 believe it's just the same?

1 So the organic chickens should
2 have reasonable access to outdoors, and a
3 reasonable amount of space once they get
4 there, so they can all go outdoors for as much
5 of the day as they want, and eat bugs like
6 they're supposed to, yes?

7 And something like carrageenan,
8 like no independent research has suggested
9 that it's safe for human consumption. I'm
10 going to assume that something like that isn't
11 in some food that I'm buying that says
12 organic. But it's in there. Only industry
13 has suggested that it's safe. The people that
14 are going to make money from me eating it.

15 For antibiotics, organic animals
16 aren't allowed to have antibiotics. Who's
17 going to think that organic plants are getting
18 antibiotics on them. So why are the
19 antibiotics allowed on organic apple and pear
20 trees?

21 And now we're talking about
22 farming shrimp, yeah? So it's just another

1 feedlot. The animals are too close together.
2 They're eating food that's not what they're
3 naturally supposed to eat.

4 What happens to all their waste?
5 It's totally polluting the water. But it says
6 "Oh, like this is organic shrimp. Now I can
7 feel good about eating it, and I'm not going
8 to look into all the information and find out
9 what's really going on, yeah?"

10 So me and all the other regular
11 people out there, we're all trusting you guys
12 to give us useful information, so we can make
13 the decisions that we want to make, and not
14 just let us believe something and then give us
15 whatever. Thank you.

16 CHAIRMAN STONE: Thank you very
17 much. Questions. Tracy.

18 MEMBER FAVRE: Were you here
19 during the presentation on the aquaculture
20 about an hour ago?

21 MS. STEINER: I was not, but I
22 heard a little bit about it.

1 MEMBER FAVRE: Well, the reason I
2 ask is because there was some discussion about
3 where the waste products go in aquaculture,
4 that it's actually very similar to what the
5 natural biology would be anyway, or the
6 biosphere would be anyway.

7 So you might want to read up on
8 that. It's actually fairly interesting.

9 MS. STEINER: Well, just like what
10 I've read from feed lots for land animals,
11 it's just so many animals in such a small
12 amount of space, that there's a huge amount of
13 waste and it has to go someplace, and I think
14 that nobody really wants to live near the pig
15 feed lot. Yeah, there's just so much waste.

16 So it can't disperse naturally,
17 and I feel like it would probably be the same
18 for animals in the water.

19 CHAIRMAN STONE: Thank you very
20 much. Oh, I'm sorry. Ma'am, one more
21 question, real quick ones. What's your co-op
22 that you love so much?

1 MS. STEINER: People's.

2 CHAIRMAN STONE: Okay.

3 MS. STEINER: And our farmers
4 market is this afternoon, if y'all want to
5 come.

6 CHAIRMAN STONE: Okay, thank you,
7 and how did you hear about the meeting?

8 MS. STEINER: From the Cornucopia
9 Institute.

10 CHAIRMAN STONE: Okay. Thank you
11 very much. George Kimbrell is up and Richard
12 Fulton is on deck.

13 MR. KIMBRELL: Good morning.
14 Thanks for the opportunity to testify. My
15 name is George Kimbrell, and I'm the senior
16 attorney with the Center for Food Safety. You
17 know us. We're a non-profit. We work on a
18 lot of different organic issues, and today I
19 am here to talk about aquaculture.

20 So you heard quite a bit about it
21 this morning. As Paul Harvey used to say,
22 this is the rest of the story. In four

1 minutes, I'm not going to be able to counter
2 some of the things that were said in the 25
3 minute presentation that you got, but I have
4 a five-page testimony that I'm submitting with
5 about 20 footnotes.

6 We've also, I've testified on this
7 since 2005 going forward. All of that is
8 integrated here and in the record. So I'll
9 try to summarize a few main points in the
10 limited time I have, and I want to be clear
11 that what I'm talking about here is finfish,
12 predatory, carnivorous aquaculture that's
13 going to be in net pens.

14 I think our position is with
15 regards to production of herbivorous fish that
16 would be in closed systems, we think that
17 could be organic and in line, in accordance
18 with the law and the principles of organic,
19 but not with regards to open water net pens,
20 and not with regard to wild feed used for the
21 main -- wild forged feed used as the main
22 source of fish meal for these animals.

1 The first one I want to make is
2 that this was a very acrimonious process back
3 in 2006-2007, when it began. If you're not
4 aware of that, you should be made aware of the
5 history of it. I believe the only protest
6 demonstration in NOSB history took place at a
7 meeting in 2007.

8 There were numerous sign-on
9 letters from broad coalitions of fishing
10 groups, as well as environmental groups and
11 consumer groups like mine, opposed to the
12 recommendation.

13 Of course, the recommendation
14 originally prohibited net pen aquaculture as
15 well as wild feed from foraged fish to be
16 used, and then did 180 degree reversal on
17 those two issues.

18 So I think the bottom line for us
19 is that this is contrary to sound science, to
20 good policy, to good governance and to OFPA.
21 It's unlawful. I'm going to talk about why.
22 First, with regards to net pens, just like in

1 agriculture, not all types of aquaculture can
2 be organic.

3 Some are inherently unsustainable
4 and inherently unorganic. Net pen aquaculture
5 is one of those systems. The escape of fish
6 into the wild is an unavoidable consequence,
7 and part of the business model for net pen
8 aquaculture.

9 I'm passing out a chart here that
10 I've introduced into the record, that shows,
11 lists just the reported escapes from the last
12 several years you can see there.

13 So this has a dramatic, negative
14 impact on biodiversity. Ms. Richardson raised
15 the point of the mandate to conserve
16 biodiversity as one of the OFPA fundamental
17 standards here, and net pen open ocean
18 aquaculture is the antithesis of that.

19 Escapes cause, threaten native
20 wild populations. They spread diseases and
21 parasites, among other things. We talked
22 about the waste issue and the pollution issue

1 here as well. I think one of the best stats
2 I've seen on that is such that, for example,
3 the farms off the coast of Scotland in one
4 year produced more waste than all the cities
5 in Scotland.

6 So they produce a tremendous
7 amount of waste that goes into the
8 environment. So when you talk about the
9 standards of promoting ecological balance and
10 conserving biodiversity, I think that's a big
11 problem here.

12 The other is the natural behavior
13 standard. Again, we're talking about salmon
14 here, which is an anadromous, migratory fish.
15 If you're ever seen a salmon run, it is one of
16 the most breathtaking things you'll ever see.
17 The idea that you could pen them up and that
18 would be natural behavior, I think, is a
19 ludicrous one.

20 Finally, I see I've got the yellow
21 light now. The other major issue I wanted to
22 talk about here is the feed issue. Now it's

1 clear that feed for organic animals, livestock
2 has to be 100 percent organic. There are no
3 exceptions to that. We've got case law on
4 that. That is well-settled.

5 What the recommendation does
6 instead, and by the way we talked about how
7 the foraged fish are the irreducible. That is
8 the main course for them. That is what these
9 fish need, the predatory ones, to live. They
10 have reclassified them in the recommendation
11 as, quote, "a feed supplement."

12 Now that reclassification is not
13 going to withstand judicial scrutiny, I'm
14 going to tell you now. So that is, I think,
15 underscores, that this activity, when it comes
16 to these fish is inherently unorganic and
17 should not be certified.

18 CHAIRMAN STONE: Thank you.
19 Questions? Harold.

20 MEMBER AUSTIN: You made a comment
21 and then just kind of blasted past it. I'd
22 like you to clarify it just very briefly, that

1 this process would be based off of acts that
2 are unlawful. In a nutshell, could you
3 describe what you made that comment based on?

4 MR. KIMBRELL: Thank you. That
5 last point I think I made about the feed is
6 very clear. Feed for organic livestock, 100
7 percent organic. We can't certify the Pacific
8 Ocean's forage fisheries.

9 So instead, we've made an
10 allowance here, similar to the Harvey case,
11 where they've said okay, 25 percent, doesn't
12 have to be organic. We're going to call it a
13 feed supplement. That's unlawful.

14 Natural behaviors of the fish,
15 unlawful. You must conserve biodiversity.
16 This is an inherently unsustainable activity,
17 unlawful.

18 CHAIRMAN STONE: Zea.

19 MEMBER SONNABEND: Thank you.
20 Could you explain a little more detail what
21 the problem is with the escaped fish into the
22 environment?

1 MR. KIMBRELL: Absolutely. Well
2 first of al, as you might imagine, you've got
3 the competition with the native populations
4 that are already on the precipice of
5 extirpation, right? So you've got the
6 takeover of their habitat. You've got
7 competition for food from them, among other
8 things.

9 When they interbreed, you have the
10 reduction of their genetic diversity, and they
11 are less likely to survive in the wild,
12 because of course farm fish are not bred to be
13 able to survive in the native ecosystems the
14 way wild fish are.

15 It also spreads diseases and
16 parasites to these fish such as sea lice.
17 We've seen this time and time again in every
18 country that has had salmon aquaculture. It's
19 destroyed the fisheries in Canada, for
20 example, the native fisheries as well as
21 Scotland.

22 CHAIRMAN STONE: Francis.

1 MEMBER THICKE: Is your
2 organization against all forms of organic farm
3 fish, or do you have others that you approve
4 of?

5 MR. KIMBRELL: Thank you. I tried
6 to make that clear at the outset. But I'll
7 absolutely reiterate it, which is that my
8 comments are intended only for finfish or
9 carnivorous, predatory aquaculture.

10 So closed systems, tilapia,
11 catfish, that the waste is contained, they are
12 fed vegetarian feed rather than wild, foraged
13 fish. Those things, I think, we would be in
14 favor of an organic standard for, absolutely.

15 I think when you talk about net
16 pen, open ocean aquaculture, and you talk
17 about predatory fish that require smaller
18 forged fish, by the way a dramatic negative
19 protein ratio. To grow one pound of salmon
20 takes between three to six pounds of ground
21 up, tiny forage fish.

22 So we're not solving any fisheries

1 crisis here. We're robbing Peter to pay Paul
2 from the oceans. Those are the types of
3 things that we do not think are organic, and
4 cannot be made to be so.

5 CHAIRMAN STONE: John.

6 MEMBER FOSTER: You made a
7 reference that the one salmon operation in
8 Scotland produces more waste than all of
9 Scotland, and I really find that tough to buy.
10 So I'm wondering what the citation is. I can
11 look that up.

12 MR. KIMBRELL: Yes. It's in my --
13 I'll give it to you right now. It's not just
14 one. It was all 350 marine salmon farms in
15 2000 produced more sewage waste, in terms of
16 nitrogen and phosphorus, than the country's
17 human population. It's footnote 9 in my
18 remarks, and the study is -- yes, footnote 9.
19 So you have a copy of this.

20 MEMBER FOSTER: And so if I look
21 at that, I'm going to find a reference that --

22 MR. KIMBRELL: You'll find a

1 scientific paper that confirms that, correct.

2 MEMBER FOSTER: Thanks.

3 CHAIRMAN STONE: Jay.

4 MEMBER FELDMAN: Thanks, George.

5 I'm wondering what you think this Board should
6 do in terms of revisiting all or a portion of
7 the underlying policy that is, that we're
8 relying on here.

9 MR. KIMBRELL: Well, Mr. Feldman,
10 I think the Board should do whatever it can
11 here, you know, in terms of rethinking it.

12 I think it needs to go back to the
13 drawing board and offer to the people an
14 organic standard that actually can be organic,
15 and to the extent we're talking about
16 herbivorous, closed systems operations, rather
17 than trying to put an organic label on
18 essentially conventional, you know, operations
19 when it comes to net pens.

20 So I leave it to the Board's
21 expertise about how you might rethink that.
22 But I think it's imperative that you do so.

1 CHAIRMAN STONE: Calvin. All
2 right. Thank you very much, George. Richard
3 Fulton is up and Brennen Herbruck is on deck.

4 DR. FULTON: Good morning. My
5 name is Richard M. Fulton. That's what my
6 mother calls me when she's mad at me. My
7 friends call me Mick Fulton, Mick kind of like
8 Mickey Mouse.

9 The reason, first of all, I am the
10 -- have been a veterinarian for 32 years and
11 have been active in the poultry industry as a
12 veterinarian for 28 years. I am currently a
13 faculty member and associate professor of
14 avian diseases at Michigan State University.

15 I actually work at an animal
16 disease diagnostic laboratory there, and I see
17 anything from somebody that has one or two
18 chickens in her backyard to commercial poultry
19 producers that have millions of chickens.

20 So my reason for being here
21 initially was my concern that there's a
22 possibility of eliminating all vaccines from

1 poultry, and after I've been here to observe
2 what's going on, it appears to me that you
3 guys are just struggling with definitions.

4 I applause you for trying to
5 figure this out. It's very complex. Even me
6 as a scientist, sometimes I don't understand
7 some of those things, and the other thing I've
8 seen is I've dealt with some of those backyard
9 people.

10 They want to also raise what they
11 call organic. They chose not to use vaccines.
12 Their birds die from diseases that are easily
13 preventable, especially with vaccines. So the
14 thing that I would recommend that you do is
15 please don't forget about the resources that
16 you have.

17 We have a great number of
18 universities of higher learning with
19 veterinary faculty and scientists on staff,
20 who have nothing to try to sell. They're
21 there for information, and I'm sure that
22 they'd be glad to work with you and be able to

1 help that process.

2 The other proviso is that I do
3 know of one vaccine that is actually
4 genetically altered. It's a vector vaccine.
5 That vaccine is excellent, and I recommend it
6 to people because it does not spread the
7 disease.

8 There are some vaccines, and most
9 vaccines are derived from finding something in
10 the wild, changing it by either growing it at
11 different temperatures, something like that,
12 and putting it in chickens to protect the
13 chickens.

14 But if there is one disease called
15 infectious laryngotracheitis that is caused by
16 herpes virus, if you use that vaccine in
17 chickens, it will spread and it will cause
18 disease. So there is a good use of that
19 vaccine, which is there's a vector vaccine
20 that has just a small protective portion of
21 that.

22 So anyway, that's my, the end of

1 my presentation. If you have any questions,
2 I'll be happy to answer them.

3 CHAIRMAN STONE: Very good.

4 Questions from the Board? Jean.

5 MEMBER RICHARDSON: Not as much a
6 question as a comment. You could be
7 absolutely certain that we're all on the Board
8 very much aware of the fact that the poultry
9 industry is one of our areas of complexity,
10 and there's no way that we're going to prevent
11 the use of vaccines in poultry, because
12 obviously it is important to have healthy
13 stock at all times.

14 So it's working it so that it --
15 coming up with something that works overall is
16 what we're trying to do over the long run.

17 DR. FULTON: Very good, thank you.

18 MEMBER RICHARDSON: Thanks very
19 much for your comments.

20 CHAIRMAN STONE: Nick.

21 MEMBER MARAVELL: Yes, just
22 another comment. Jean and I served on the

1 Working Group. This Board does not try to
2 take action, which would be overly disruptive
3 to producers, so that anything we did would
4 have to be taken and take industry practice
5 into account.

6 Our intention is to have a safe
7 food supply here and a healthy livestock. So
8 we're going to take those things into account.

9 DR. FULTON: Very good. Sounds
10 like you're working with me.

11 CHAIRMAN STONE: All right. Thank
12 you very much. So Brennan Herbruck is up, and
13 David Will is on deck.

14 MR. HERBRUCK: Hello. My name is
15 Brennan Herbruck. I'm a fourth generation egg
16 farmer from Michigan. I'm responsible for
17 approximately 100,000 organic-laying hens
18 located across several small farms.

19 Over the last few months, I have
20 seen young hens being affected by the two
21 pound per ton limit on methionine. Some of
22 the symptoms I have encountered are hens

1 pecking the feathers off each other. I've
2 seen resulting injuries where they've actually
3 died from that.

4 The hens are also eating all the
5 loose feathers that they can find on the
6 ground. This indicates to me that they are
7 not receiving enough methionine in their feed,
8 and are trying to get it from any other source
9 that they can.

10 They've also been eating their own
11 eggs that they can find. They kind of peck at
12 it, and then they try to get something out of
13 that. The welfare of the hens is being
14 jeopardized by the lack of methionine in their
15 early life. They will find methionine from
16 other sources like the bodies of other hens if
17 they cannot get it in their diet.

18 This really concerns me about the
19 welfare of my hens, as it seems like abuse to
20 arbitrarily restrict the important nutrient
21 from them at a critical stage of their life,
22 and the resulting pecking is definitely a

1 welfare concern, because it will lead to
2 higher death loss in my houses. That's it.

3 CHAIRMAN STONE: Very good, thank
4 you. Questions? Calvin.

5 MEMBER WALKER: Could you give us
6 a rough, maybe a percentage of your birds that
7 shows that feather-picking tendency and
8 percent death?

9 MR. HERBRUCK: Probably about ten
10 percent of the ones that died.

11 CHAIRMAN STONE: Harold.

12 MEMBER AUSTIN: If we don't make a
13 modification to the methionine ratios that are
14 on the books now, what long-term impact would
15 that have on your operation?

16 MR. HERBRUCK: I think this will
17 just continue, and just, if there is no step-
18 down especially, it will make it much worse.
19 Yes, it will just keep continuing like this
20 and make it worse.

21 MEMBER AUSTIN: Make it worse.
22 Would you be able to continue to do business?

1 Would you choose to continue to do business
2 with the effects that it would be having on
3 your stock?

4 MR. HERBRUCK: I'm not really
5 sure. I can't speak to that.

6 MEMBER AUSTIN: Okay, thank you.

7 CHAIRMAN STONE: Nick.

8 MEMBER MARAVELL: What did you
9 think about the recommendations that were put
10 up, in terms of stepping up and stepping down
11 the use of methionine through different stages
12 of production?

13 MR. HERBRUCK: I think that's a
14 good recommendation. They do have different
15 requirements throughout different stages of
16 their life. So I would support something like
17 that.

18 CHAIRMAN STONE: Could you briefly
19 describe the general management practices that
20 you use for your birds, your housing, their
21 access to the outdoors, the type of feed they
22 have available to them?

1 MR. HERBRUCK: Well, they are
2 certified organic. They have access to the
3 outdoors, to sunlight, to the ground, to
4 grass and dirt, and they have areas that go
5 inside. We are in the north, so they do have
6 to be inside in the winter, so they don't get
7 any access in the winter.

8 CHAIRMAN STONE: All right. Thank
9 you very much. David Will will be the last
10 presenters in the livestock session.

11 MR. WILL: Hi. My name is David
12 Will. I'm the general manager of Chino Valley
13 Ranchers, a Southern California-based organic
14 egg producer. I'm also the chairman of the
15 United Egg Producers Organic Egg Committee,
16 and I am one of the founding members of the
17 Methionine Task Force, at which my comments
18 are directed towards.

19 I want to thank you first for the
20 time and for hearing our public comment, and
21 I also wanted to let you know that the
22 Methionine Task Force is a group based of

1 about 15 like-minded producers in the broiler,
2 layer and turkey industry, and of those 15
3 producers, we represent about 200 organic
4 family farms, anywhere from 1,500 to 18,000
5 layers, single family farm businesses in
6 addition.

7 That includes everything from a
8 pasture-based system all the way to an
9 organic-based system. In the past, the
10 Methionine Task Force, we've been here since
11 about 2007 presenting to you.

12 Things that we've done and looked
13 at in the past is we funded a high methionine
14 corn study. We did our own trial within our
15 company of 15,000 sister birds that we fed
16 zero additional methionine to. Those were in
17 a cage-free operation. They were not
18 organically fed.

19 We've done a literature review of
20 all literature out there on methionine in the
21 world, and I have just passed out to you a
22 current study that we funded through the

1 University of Pennsylvania and University of
2 North Carolina.

3 While the Task Force funded the
4 study, we have retained absolutely zero
5 editorial rights on the study, and they intend
6 on publishing it in Poultry World magazine.

7 We wanted to thank you from the
8 Task Force for delaying our petition from this
9 meeting 'til the October one, mainly because
10 we'd agree with you. There is no time to
11 really look at the total impact of the step-
12 down.

13 We've only had 27 weeks since the
14 step-down went into effect on October 1st of
15 2012, and if you look at that, it takes 24
16 weeks to get an organic layer from day of age
17 to realistic egg production.

18 So we anticipate that only about
19 five percent of the eight million plus organic
20 layers have been raised and are actually in
21 full lay, based on just the timing of
22 replacement of flocks with the 70-week

1 replacement cycle.

2 We think that we will have a lot
3 more information to give you at the summer.
4 We will have the conclusion of our study.
5 We're also now feeding a much higher level of
6 feed, because in cold weather, birds eat more
7 and so they are in direct getting more
8 methionine.

9 Throughout the summer, we
10 anticipate some of the effects being a little
11 bit more severe, from the fact that they're
12 being fed less methionine, because they'll be
13 down about 25 percent in total feed
14 consumption.

15 Right now, we're having producers
16 tell us they've had no issues to, or having
17 minor or moderate issues which have ranged
18 from bird health issues and the ammonia levels
19 in the farms due to overfeeding of protein, a
20 wetter dropping, feather issues.

21 Also at the Anaheim Expo, I had
22 two different organic certifiers come up and

1 talk to me, and both of them said that their
2 certifiers going into the farms have noticed
3 issues with the birds, just from the last time
4 they were there, on either environmental or
5 physical appearance.

6 In fall of this year, we will
7 present the study for you, and we will also
8 bring a large group of individual family farms
9 to take a look at everything, and so that you
10 can hear firsthand from them what the change
11 has been.

12 What we're mainly asking for is
13 the change, that we go to a two-pound average,
14 because we don't feel you should feed an
15 infant the same rate you should feed a
16 teenager, that you should feed a senior
17 citizen.

18 We want to work with our
19 certifiers in order to get a method that they
20 feel they can certify on the farm level, that
21 guarantee that we still have that two pound
22 average over the life of the bird, instead of

1 the hard cap.

2 That's our goal. Thank you very
3 much for your time, and I didn't make it. Oh
4 well. Thank you.

5 CHAIRMAN STONE: Sorry. I think -
6 - oh Tracy, questions?

7 MR. WILL: Yes.

8 MEMBER FAVRE: Not so much a
9 question as a request. Since we will be
10 addressing this issue at the fall meeting, I'd
11 really appreciate if you guys do communicate
12 with us as much as you're able to prior to the
13 report coming out, so that we can use that as
14 part of our deliberations.

15 MR. WILL: Yeah. The contact
16 information for the professors is on here. I
17 can get you information. Like I said, we just
18 funded the study. After that, we're
19 completely hands-off.

20 So we have invited them to come
21 and have offered to pay for them to come to
22 this group, to make a presentation. Any time

1 that would be allowed for their presentation,
2 we'd be appreciative of as a group.

3 CHAIRMAN STONE: Thanks, Dave.

4 MR. WILL: Thank you, sir.

5 CHAIRMAN STONE: So Terry Shistar,
6 just so you know. You're still at top of the
7 list of the timing, and we're just figuring
8 out what the prize is at this time.

9 Madam Chair, that concludes the
10 public comment for the Livestock session.

11 MEMBER FAVRE: Okay. Thank you,
12 Mac. I think that next on the agenda is
13 actually a break for the Subcommittee, to
14 modify proposals as needed. Mac, do you have
15 any -- since you're, really have the only
16 proposal, do you have any feedback on that?

17 CHAIRMAN STONE: Yes ma'am. I'd
18 like to get the committee together and
19 evaluate a recommendation based on public
20 testimony, and maybe we'll bring something
21 back tomorrow for a vote.

22 MEMBER FAVRE: Okay. So basically

1 everybody, it looks like we're going to
2 postpone the vote on the pet food amino acids
3 until tomorrow, if everybody's okay with that.

4 CHAIRMAN STONE: So maybe we can
5 either meet at lunch or tonight or something
6 and discuss what we've heard. Jay.

7 MEMBER FELDMAN: So we'll -- can I
8 ask a question about it, so that maybe the
9 Subcommittee could consider it? I'm still a
10 little unclear as to whether a high animal
11 protein diet that is available on the market
12 currently, maybe not as organic, does not
13 require the addition of the amino acids and
14 specifically the taurine.

15 If that is the case, I'd really
16 like to get clarification on that. I've been
17 on their website, Nature's Logic. I don't
18 know if that's one of the ones you looked at
19 when you did your survey.

20 But I really think we need an
21 answer to that question, because if it is
22 available, it's really, I think it's difficult

1 to make an essentiality argument. Thanks.

2 CHAIRMAN STONE: Okay. Okay. So
3 that concludes the morning session. It's
4 11:30. We will break for lunch. I think
5 because this afternoon is so tight, we want to
6 have as much time as we can. We'll take an
7 hour and 15 minutes.

8 Before you leave, a couple of
9 notes. They are going to lock the room,
10 because there's another conference across the
11 hallway, and access to outdoors. So your
12 computers and all your things will be fine.
13 They'll open it up obviously a little while
14 before we come back.

15 But let's come back at 12:45
16 promptly to start the Crops Committee. Thank
17 you.

18 (Whereupon, the above-entitled
19 matter went off the record at 11:29 a.m. and
20 resumed at 12:50 p.m.)

21
22

A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N

(12:50 p.m.)

1
2
3 CHAIRMAN STONE: If I could have
4 everyone's attention, we'll get started for
5 the afternoon session. We broke a little
6 earlier for lunch.

7 The panelists are here. They're
8 prepared for the presentation. We just want
9 to give ourselves as much time as we can for
10 this spirited debate that we're engaged in at
11 this time.

12 I want to remind the audience as
13 well as Board members that we've had the
14 luxury of time to ask numerous questions of
15 various presenters. We've had the luxury of
16 time for the presenters to give lengthy
17 answers.

18 But in the effort, we'll have to
19 just watch the clock and if presenters, don't
20 be offended if I have to cut you off or Board
21 members not be offended if I encourage you or
22 I don't call you in the effort of time. So

1 just a reminder that we have this luxury the
2 last couple of days and don't get spoiled at
3 all.

4 So, so. I'm excited. We're
5 scheduled to quit at 5:30 or something, but
6 certainly 5:40. Certainly, if we're doing
7 good and having the right kind of
8 conversation, we'll certainly let it -- I'm
9 not opposed to letting it run a little bit
10 long.

11 But at some point, there's
12 diminishing returns or not new information and
13 that kind of thing. So Jay, I'll turn the
14 program over to you.

15 Crops Subcommittee

16 MEMBER FELDMAN: Thank you Mac,
17 and welcome back from lunch everybody. We
18 have an exciting panel to help introduce a
19 discussion on the petition for tetracycline
20 use in apple and pear production.

21 We have four speakers on the panel
22 this afternoon, and we've asked each speaker

1 to present about a ten minute introduction of
2 the issue from their perspective, and then we
3 as a Board will follow up with about a half
4 hour of questioning, and then we'll go into
5 our presentations.

6 The first speaker will be Dr. Ken
7 Johnson. Dr. Johnson is a professor of Botany
8 and Plant Pathology and has been since 1999 at
9 Oregon State in Corvallis. He has a Ph.D. in
10 Plant Pathology from the University of
11 Minnesota, an M.S. in Plant Pathology and a
12 B.S. in Plant Health Technology.

13 Dr. Johnson's major research
14 interests include plant disease, epidemiology,
15 with emphasis on disease and inocular
16 dynamics, management, strategies, disease
17 impact assessment.

18 We know Dr. Johnson from his work
19 with the e-Organic webinar, which we really
20 appreciate you holding over the last year or
21 so, and we also know that he drives a mean van
22 and took us around the Mount Hood

1 neighborhood. So thank you, Dr. Johnson, for
2 being here.

3 DR. JOHNSON: I guess speaking to
4 the Board is pretty easy, because I think most
5 of you have probably seen my webinar, and I
6 drove you around for a day in Hood River. So
7 we went out and looked at different orchards.

8 For everybody else, my part in
9 this has been to look at the development of
10 alternative approaches to fire blight control
11 in organic orchards, and we have had a several
12 year project now, a research project through
13 the OREI, to investigate just that.

14 I actually go back in fire blight
15 in looking at alternatives to antibiotics for
16 about 25 years. So I've got a long experience
17 in this area.

18 Our project the last three, four
19 years has sort of been to take a systems, we
20 call it a systems approach, and we're looking
21 at a lot of different issues in fire blight.
22 When does the pathogen become active. Can we

1 use sanitation to suppress the pathogen early
2 before bloom.

3 Things like interactions with
4 bloom thinning, and then products that would
5 be effective during the mid to late bloom
6 periods, that are when you need to protect
7 flowers from fire blight and to prevent
8 infections in your orchards.

9 In that regard, we've become
10 interested in two products. There's lots of
11 products that give some activity in fire
12 blight control, and many of them are organic.
13 But two of them that we've been especially
14 interested in has been this yeast material
15 called Blossom Protect. It was registered by
16 the EPA last year.

17 It comes from Europe, some German
18 scientists. It was very limited in supply
19 last year and this year, it's much more
20 available, and there's quite a few people that
21 are going to use it in Washington State this
22 next season or right now, in fact. So we're

1 learning a lot, and about that material this
2 year.

3 The second material that we've
4 been interested in has been a copper material
5 made by the Gowan Company, and it's a new
6 formulation of copper sulfate that Gowan has
7 sort of been staking their formulation --
8 Gowan's very interested in formulation, and
9 they've got this mix of copper sulfate with
10 seaweed and things that they think is safer to
11 the finish of fruit.

12 Just to back up a little bit,
13 copper bactericides are pretty good materials
14 for fire blight control. The problem that
15 they have is that they're a little bit
16 phytotoxic.

17 So that if you spray copper
18 bactericides to control fire blight, you risk
19 damaging the finish or the skin of your fruit,
20 and it's a cosmetic thing.

21 It doesn't affect the nutritive
22 value of the fruit. But if you are trying to

1 sell fruit in a grocery store or in some place
2 where you're competing with a lot of other
3 products, if your fruit doesn't look just
4 right, just so, then you've got a problem.

5 So part of the reason that
6 antibiotics are useful is that they are so
7 safe for fruit, and they don't do these
8 things.

9 We look at the alternatives, and
10 the alternatives then give us this risk that
11 our fruit won't finish as well, and when it
12 doesn't finish as well, it's not worth near as
13 much, at least downgrading and it becomes hard
14 to make money selling organic fruits.

15 So those are the big issues, and
16 that's also an issue with the Blossom Protect
17 too, although in the drier climates like
18 central Washington, we don't think fruit
19 russet from Blossom Protect will be an issue,
20 and the testing that's gone on with this new
21 copper material that we think is safer, this
22 new formulation of copper that we think is

1 safer, also shows that in the drier climates
2 on apple, it appears to be a fairly safe
3 material.

4 The copper material does not have
5 an EPA registration yet, and it's just being
6 submitted this year. So the first year that
7 it could potentially be available would be the
8 year 2014. I guess I've still kind of got my
9 fingers crossed about that. I've seen things
10 take longer than that to go through
11 registration processes.

12 I think that the 2015 season would
13 be the first season that this copper material
14 would be widely available. The company has
15 said that their ingredients for the
16 formulation have been accepted as organic.
17 You know, they've run it through the
18 preliminary screening that it needed to have
19 to get that.

20 So they are reasonably confident
21 that they can get an organic OMRI
22 certification for their material, but they

1 still are, you know, a year to two years from
2 widespread use of the material in organic
3 orchards.

4 So I think that's sort of my
5 summary. I guess the other thing about it is
6 that biocontrol agents like yeast are useful
7 during the flowering period, and they're
8 pretty much restricted to being useful during
9 the flowering period.

10 If we look at our fire blight
11 problems that we have in industry, that yes,
12 we have problems in the flowering period, but
13 we also have problems in the post-flowering
14 period. We have problems when fire blight
15 breaks out in the summer, due to a hailstorm
16 or some event like that.

17 And so the yeast is not going to
18 have any value to the type of fire blight that
19 you get, say after the primary bloom period.
20 This copper material does have value for that,
21 and it is another reason that we're interested
22 in it. We would look at it as the best and

1 the direct substitute for oxytetracycline, and
2 I'll stop right there.

3 MEMBER FELDMAN: Thank you, and we
4 will have a chance to ask questions again
5 after this. Our second speaker is Dr.
6 Virginia Stockwell, who is a research
7 Assistant Professor in the Department of
8 Botany and Plant Pathology also at Oregon
9 State University.

10 She has a Ph.D. from the
11 Department of Botany and Plant Pathology at
12 Colorado State University, an M.S. as well,
13 and a B.A. in the Department of Biological
14 Sciences from Rutgers.

15 Her major research interests
16 include biological control of plant diseases,
17 antibiotic resistance mitigation, microbial
18 ecology, epidemiology, bacterial pathogen
19 diversity, and her research focuses on sources
20 and variation in biological control efficacy
21 at the population molecular level. Thank you
22 so much for joining us.

1 DR. STOCKWELL: Thank you, Jay,
2 and thank you for the opportunity to talk with
3 y'all today. It's a rare opportunity, and I
4 appreciate it.

5 As Jay indicated in my
6 introduction, I have been interested in
7 antibiotic resistance and the use of
8 antibiotics in orchard environments, and
9 trying to do some risk assessment as far as
10 what are the dangers or potential risks,
11 putative risks associated with the use of
12 antibiotics in orchards.

13 I want to say that one thing we
14 have looked at streptomycin more so than
15 tetracyclines, because streptomycin's used in
16 more countries around the world than
17 tetracyclines. But some of that work is
18 applicable to our work on tetracyclines.

19 For example, there was concern
20 that maybe plant grade antibiotics would be
21 contaminated with their fermentation products.
22 So they grow the bacterium that produces them,

1 and then they, in the case of plant-created
2 antibiotics, they do purify the antibiotic
3 from the culture fluid, and then they add that
4 to a clay material like kaolin, to make the
5 final product.

6 In animal agriculture, there are
7 some cases where they're just spinning down
8 the entire broth culture, resulting in both
9 the producing strain being present in the
10 antibiotic formulation, and also the
11 resistance genes, which could be a problem
12 when they're using it for growth promotion.

13 In plant-created antibiotics, we
14 did look at, look for DNA in those products,
15 and we did not find any from products
16 collected from around the world. So at least
17 we know we don't have bad products. We don't
18 have contaminated products. The products are
19 human grade and fairly clean. So that's one
20 thing.

21 I was given three questions to
22 address, and I'll do those briefly. I'll take

1 the second one first. Please explain the
2 breakdown in tetracycline in an orchard, after
3 it's used for fire blight management, and how
4 likely is it to persist in soil or contribute
5 to resistance in soil microbes over time.

6 So with the tetracyclines, the
7 form that's used in plant agriculture is
8 actually the oxy form, oxytetracycline. It's
9 still a natural product, but it's -- the oxy
10 form is more heat-tolerant.

11 If you buy tetracycline from a
12 chemical company like Sigma Chemicals, and
13 store it in the lab, it will degrade just due
14 to air temperature. So you have to freeze it.
15 The oxy form is room temperature-stable. So
16 that's one reason it's used in plant
17 agriculture.

18 There is some instabilities,
19 though, with oxytetracycline. For example,
20 these tetracyclines absorb light strongly, and
21 they're degraded by exposure to light or
22 sunlight. They're also labeling basic

1 conditions.

2 So there was some work done by
3 Christiano and all on oxytetracycline
4 persistence in the orchard canopy after sprays
5 on peach, because it's also used for
6 bacterial-spotted peach, and they found that
7 first of all, sunlight and UV radiation does
8 degrade the compound very rapidly.

9 They also found that some rainfall
10 would wash the compound quickly off of the
11 leaf surfaces, and they also demonstrated that
12 there was no absorption into the leaves by the
13 oxytetracycline applied on the surfaces.

14 So they found that if you had a
15 rainstorm within say a day of application of
16 the tetracycline, it pretty much would be
17 washed off and not present on the plant
18 surface anymore for inhibition.

19 Which is why we recommend that you
20 time your sprays, so you don't hit bad
21 weather. I have applied tetracyclines onto
22 flowers in a screen house so it's protected

1 from rain, and found that the activity, the
2 bioactivity of the compound lasts for about
3 four days.

4 So that's the duration of the
5 inhibition of bacterial on plant surfaces.
6 It's about four days. You could be generous
7 and say less than a week. So it's not
8 persistent as far as its selective
9 capabilities.

10 Also antibiotics are not
11 mutagenic. They're just selecting for
12 resistant strains amongst the population. So
13 I just wanted to make that point.

14 As far as what happens when it
15 falls on soils, it's rapidly absorbed by soils
16 and loses its activity. Actually, if you just
17 add iron to tetracycline, it loses activity.
18 It's a kelator, so it kelates iron and loses
19 its antibiotic activity.

20 So they found that even just most
21 of the work on soils and tetracycline
22 stability's actually been done with animal

1 manures, because they estimate between 40 to
2 90 percent of the tetracyclines administered
3 to animals is excreted into manures. So that
4 was the interest there.

5 They found that even with
6 overloading soils with heavily contaminated
7 manure, the tetracyclines were absorbed, and
8 only in rare cases did they even see an effect
9 on the -- only in cases where it was really
10 heavily loaded with antibiotic resistance
11 genes and also tetracyclines did they see a
12 change in the soil community.

13 So generally with the spray, 200
14 parts per million per acre, you'd get many two
15 micrograms landing per square centimeter of
16 soil. That would probably be bound very
17 quickly and activated by both -- if it's on
18 the surface by sunlight, and also by natural
19 hydrolysis, and also by the binding to soil
20 particles.

21 The other two questions I have is
22 what's my analysis of horizontal gene transfer

1 in bacteria from orchards to human pathogenic
2 organisms, and has this actually occurred. We
3 have no evidence that it has actually -- that
4 is has occurred to human pathogens, first of
5 all.

6 Now I've done a lot of work on --
7 we've looked in orchard fruit and flowers and
8 leaves. Work's been done by Temple in
9 Johnson's group, Larry Pusey up in Washington.

10 I've worked on pear flowers and
11 Patty McManus did work in Wisconsin, using
12 culturable and non-culturable techniques, and
13 we have not found any human pathogens on these
14 plant surfaces. So at the time when we're
15 applying antibiotics, human pathogens aren't
16 there.

17 Now I had done a lot of work on
18 acquisition of plasmids by the fire blight
19 pathogen, erwinia amylovora, and we have found
20 some years that up to 60 percent of the
21 isolates during epidemics have acquired
22 plasmids, which is amazing.

1 So we know that plasmid exchange
2 can happen on flower surfaces. The
3 interesting thing is we are sequencing those
4 plasmids and we're assembling them now, and we
5 have not detected any antibiotic resistance
6 genes on these plasmids.

7 So although we have plasmid
8 exchange with the fire blight pathogen, which
9 is a distant cousin from e coli, erwinia
10 amylovora is an enterobacteriaceae, which is
11 similar to e. coli. We have not seen any
12 acquisition of antibiotic resistance, just
13 acquisition of plasmids.

14 So yes, if human pathogens were
15 present on flowers, yes, they could probably
16 acquire plasmids. But that's the problem. We
17 lack the recipient. We don't have the human
18 pathogens on flowers. So there's no evidence
19 that we have horizontal gene transfer directly
20 from bacteria to human pathogens in orchards.

21 Finally, what's the possible risk
22 to human health or the environment with the

1 current use, cycles, and rates of tetracycline
2 used in the Pacific Northwest?

3 There's a couple of things I want
4 to say. First of all, when we think about
5 antibiotics as selection agents, most of the
6 cases that are brought from the literature
7 deal with subtherapeutic uses and chronic
8 exposure to antibiotics.

9 Here, we're dealing with an acute
10 exposure. The spray is present for a couple
11 of days, and then it loses its selective
12 capability. The amount found on residues on
13 fruit, when present, are extremely low. So
14 they'll be sublethal doses, and we could talk
15 about that later.

16 Honestly, we've looked at fruit
17 from sprayed orchards and non-sprayed. Patty
18 McManus at Wisconsin just finished up a huge
19 metagenomic study, where they looked at
20 orchards that have been sprayed for ten years
21 with streptomycin, which is more selective
22 than tetracyclines, and orchards that have

1 never been sprayed with antibiotics.

2 The bacterial communities on the
3 fruit, the leaves and the flowers, or the
4 fruit and the leaves and also the flowers in
5 late bloom, were indistinguishable. They had
6 the same level of naturally-occurring
7 streptomycin resistance, but the population
8 structure was not changed over time.

9 Fiona Walsh in Switzerland has
10 also done similar work, looking at leaves,
11 flowers and soils, and again right after a
12 spray, she does see a shift in antibiotic
13 resistance genes. But within a week, it's
14 indistinguishable between soils that were
15 treated with streptomycin or -- streptomycin
16 primarily, and non-treated.

17 Then we've also done work using
18 culture-based studies, where we also sprayed
19 flowers with streptomycin, tetracycline or a
20 combination of the two, and we do see a change
21 in populations on antibiotic treated trees.
22 The populations are lower for about a week.

1 But within 14 days, 45 days and
2 also in fruit, you cannot tell the difference
3 between fruit that were sprayed with
4 antibiotics during bloom, and those that were
5 not.

6 So if a human did obtain an
7 antibiotic resistance gene from eating a
8 fruit, I wouldn't be able to tell you if that
9 fruit was from a sprayed or non-sprayed
10 orchard, because if I just looked at the
11 bacteria present on fruit from sprayed or non-
12 sprayed orchards, or the number of antibiotic
13 resistance genes on those fruit, there's no
14 difference.

15 So there's not a clear linkage
16 between antibiotic application and what ends
17 up on the fruit at the end, and it's really --
18 there's no direct linkage with human pathogens
19 at this point. So I'll stop there and turn it
20 over to Jay.

21 MEMBER FELDMAN: Thank you, Dr.
22 Stockwell. Our next speaker is Brenda Book.

1 She is the program manager for the Washington
2 State Department of Agriculture's Organic Food
3 Program. Brenda holds a B.A. in Sustainable
4 Agriculture from the Evergreen State College
5 and studied botany at the University of Iowa.

6 I guess you've been with the
7 Washington Department of Agriculture's organic
8 program since 2002. Ms. Book oversees all
9 aspects of the agency's organic certification
10 services and staff.

11 She's a native of Central Iowa and
12 grew up on a family farm, third generation,
13 grain and livestock farm that has been
14 involved in the organic industry since 1996 as
15 a farmer, researcher, retail, produce manager,
16 farmers market regulator and regulator.

17 In addition to managing the WSDA's
18 Organic Program, Brenda currently serves on
19 the Board of Directors for Tilth Producers,
20 and is the past president of the National
21 Association of State Organic Programs. Thank
22 you Brenda for being here.

1 MS. BOOK: Thank you. I really
2 appreciate having the opportunity to provide
3 technical information on the certification
4 process, and I truly hope I can be some
5 assistance to your work and the organic
6 community.

7 I would also like to add, as far
8 as my introduction, that I -- so you know
9 where I'm coming from, I'm also a mother and
10 a dedicated organic consumer. My family eats
11 organic apples and pears every day, literally.

12 A little bit about Washington
13 State Department of Agriculture Organic
14 Program. We have a long history of organic
15 inspection and certification services. 2013
16 marks the 25th year of certification for our
17 agency. We are the oldest and largest state-
18 run certification agency in the country, in
19 terms of acreage and number of clients.

20 The mission of the WSDA Organic
21 Program is to protect consumers and support
22 the development of the organic food industry

1 by ensuring the integrity of organic food
2 products. All of our 24 staff, the agency and
3 our organic stakeholder advisory group take
4 this mission very seriously.

5 So a little bit about tree fruit
6 in Washington. Washington state produces, is
7 the number one producer of organic apples. We
8 produce about 65 percent, and we're also the
9 number one producer of organic pears, about 61
10 percent.

11 You know, if you're interested in
12 more statistics about Washington State
13 agriculture, the Center for Sustaining
14 Agriculture and Natural Resources utilizes all
15 the WSDA certified organic producer data to
16 produce reports, specifically on organic tree
17 fruit in the state.

18 As we reported in our public
19 comments in Seattle, in 2010, WSDA certified
20 719 producers. Of these producers, 361 are
21 certified for organic apples and/or pears. Of
22 these, 136 farmers included the use of

1 tetracycline in their organic system plan.

2 I do want to make a clarification,
3 though, that that data was taken from the plan
4 and not from the actual inspection findings of
5 confirmed use. In 2012, a year that was
6 particularly high in fire blight incident, 76
7 of our 333 certified apple and pear producers
8 used oxytetracycline.

9 Of these 76 growers, 34 of them or
10 45 percent also produced apple and pear
11 varieties that are in compliance with the EU
12 export restrictions, which means they produce
13 them without oxytetracycline.

14 I do want to note that that total,
15 as far as number of apple and pear producers,
16 also includes those producers that may just
17 have one apple or pear tree in their backyard.
18 So we have a wide variety included in those
19 numbers.

20 I should mention too, about 736
21 producers total; we certify over 1,100
22 certified operations, handlers and processors

1 that are all part of that chain of custody for
2 those certified organic apples and pears.

3 So I want to, in my introduction
4 here, go through the certification process,
5 and explain what we do to evaluate the use of
6 material on an organic farm, and specifically
7 the use of an antibiotic.

8 So Section 205.206 of the National
9 Organic Standards is the crop, pest, weed and
10 disease management practice standard. Within
11 the standard, the requirements are outlined.
12 The requirements that have to be met prior to
13 the use of any material are outlined.

14 The practice standards require
15 producers to use management practices to
16 prevent crop, pest, weed and disease
17 including, but not limited to, crop rotation
18 for annuals, biodiversity for perennials, soil
19 and crop nutrient management practices, good
20 sanitation to limit the spread of infection,
21 and cultural practices such as pruning for air
22 flow and selection of varieties that are

1 resistant to prevalent pest, weeds and
2 disease.

3 Resistance to one disease may mean
4 high susceptibility to another. We find that
5 our growers are continually put in the
6 position of making the choice of what disease
7 they can best manage, when they are selecting
8 varieties.

9 205.206 also goes on to state that
10 disease problems can be controlled through
11 management practices which suppress the spread
12 of the disease, and the application of non-
13 synthetic biological, botanical or mineral
14 inputs.

15 So it's only after all those
16 different preventative practices have been in
17 place, and that first level of preventative
18 practices, if they've been implemented and
19 they're not effective, then 205.206(e) goes on
20 to state that a material listed on the
21 National List, specifically 205.601, may be
22 applied to prevent, suppress or control pests,

1 weeds or disease, provided the conditions are
2 documented in the organic system plan.

3 So 205.601 materials such as
4 oxytetracycline may be applied and are
5 explicitly allowed as a component of multi-
6 level preventative plan.

7 The National Organic Standards do
8 require confirmed -- do not require confirmed
9 detection of fire blight in an orchard prior
10 to an oxytetracycline application. Use of
11 models to determine risk and prevention needs
12 are consistent with the regulation.

13 So that's the standard that we are
14 focused on when we are evaluating materials.
15 So I want to put that into practice a little
16 bit and go through our application review and
17 inspection process, so you see how we apply
18 that.

19 So in the application process,
20 USDA National Organic Standards Section
21 205.200 require an operation to develop an
22 organic system plan. Requirements of this

1 plan include description of practices and
2 procedures, a list of all the substances to be
3 used, a description of monitoring practices,
4 and a description of record keeping system.

5 In the WSDA organic system plans
6 specifically, we require a narrative disease
7 prevention description. We also provide
8 checkboxes to indicate practices that are
9 utilized to prevent disease, such as crop
10 rotation, resistant varieties, vector
11 management, plant spacing, companion planting,
12 soil balancing, composting, field sanitation,
13 timing and planning of cultivation.

14 Our system plan is not just a tree
15 fruit operation system plan. So it's the wide
16 variety of those different practices that may
17 be used.

18 We also require a self-assessment
19 of the effectiveness of a producer's plan, and
20 a question about whether disease control
21 materials will be used if preventative
22 practices are ineffective.

1 Then on an annual basis, the
2 certified operation is submitting an update of
3 their plan to us, and within our update form,
4 we require again a description of the
5 monitoring, an evaluation of the effectiveness
6 of that plan, and we ask for plans to improve
7 disease management for the upcoming year, that
8 continuous improvement that we're all looking
9 for within certification.

10 So then once we get either that
11 initial application or that renewal
12 application, then our staff are doing a review
13 of that. Section 205.402 and 205.406 are the
14 parts of the regulation that pertain to this.

15 After receipt of a new or renewal
16 application and an organic system plan, then
17 our trained certification specialists review
18 the paper work for compliance with the entire
19 regulation. The review includes evaluation of
20 both the practice standards and the National
21 List compliance for those material inputs.

22 All of our producers must

1 implement an integrated preventative system
2 with regards to pest, weeds and disease.

3 These preventative systems are dependent on
4 current cultural practices such as trellis
5 systems versus standard planning, site-
6 specific conditions and risks.

7 Practice must foster biodiversity
8 of the production sites. We see permanent
9 grass, row cover; we see insectory hedgerow
10 plantings, crop species, diversification, all
11 those ways that a producer may be meeting
12 these requirements.

13 So reviewers are also looking in
14 the system plan for references to models, or
15 confirmation of work with crop consultants.
16 These are established and well-tested industry
17 norms that are used widely in both organic and
18 conventional tree fruit production.

19 We will return a system plan to a
20 grower if the required preventative practices
21 and monitoring techniques are not outlined or
22 implemented prior to the use of a synthetic

1 substance.

2 In the situation of
3 oxytetracycline, this is a rare occurrence,
4 given the fact that management practices
5 required by organic standards are simply good
6 farming practices, with monitoring built into
7 the widely-used models.

8 So I'm going to move onto
9 inspection. So the inspection takes place,
10 and it's 205.403 that we're focused on now,
11 and during the on-site inspection, the
12 inspector's job is to verify compliance or
13 capability to comply.

14 They're also there to verify that
15 the information submitted in the system plan
16 accurately reflects the practices, and that
17 prohibited substances have not been applied.
18 So our inspections are a combination of
19 interviews, field observations and records
20 reviews.

21 WSDA, we specifically hire
22 inspectors that are experienced in the

1 agriculture systems in which they will be
2 inspecting. Experience in tree fruit is a
3 requirement for tree fruit producing
4 territories.

5 We have a robust training program
6 and provide ongoing continuing education
7 opportunities such as webinars, attendance to
8 industry conferences, so that our inspectors
9 are up to date on current preventative
10 strategies and control methods.

11 The report that our inspectors
12 fill out require observations as well as the
13 verification of records to support the use of
14 any input material.

15 We rely on our expert inspectors
16 to observe and verify that preventative
17 disease management strategies have been
18 implemented. And when fire blight is active
19 in those different inspection territories, our
20 inspectors are well-informed of the conditions
21 and situations.

22 For the most part, our inspection

1 staff is located right in the territory that
2 they work, so they are very familiar with the
3 industry that they are inspecting.

4 The tree fruit industry is very
5 diverse in site selection and acres and
6 varieties grown, climate, elevation, soils and
7 management practices, and that's just in
8 Washington state. The occurrence and risk of
9 fire blight infection varies widely from year
10 to year and is dependent on many of those
11 environmental factors.

12 Regardless of this diversity and
13 variation, the current disease management
14 practices and standards are effectively
15 implemented. I'll stop there for now.

16 MEMBER FELDMAN: Thank you very
17 much. Our next speaker will be Dr. Glenn
18 Morris, who is the director of the newly-
19 established Emerging Pathogens Institute at
20 the University of Florida, where he is also
21 Professor of Medicine, specializing in
22 infectious diseases.

1 He received his B.A. degree from
2 Rice University in Houston, and his M.D. and
3 Master's degree in Public Health and Tropical
4 Medicine from Tulane. His residency training
5 was at the University of Texas-Southwestern
6 and Emory University, with service as an
7 epidemic intelligence service officer at the
8 Centers for Disease Control and Prevention in
9 Atlanta.

10 He is board-certified in internal
11 medicine and infectious diseases. From 2000
12 to 2007, he served as chairman of the
13 Department of Epidemiology and Preventive
14 Medicine at the University of Maryland-
15 Baltimore School of Medicine, and from 2005-
16 2007, was interim dean of the UMB School of
17 Public Health.

18 From '94 to '96, Dr. Morris worked
19 with the Food Safety Inspection Service, USDA,
20 on development of the new hazard analysis and
21 critical control project regulations, created
22 and directed by FSIS Epidemiology and

1 Emergency Response Program, the forerunner of
2 the FSIS Office of Public Health and Science,
3 and was responsible for the establishment of
4 FoodNet, the national surveillance system for
5 food-borne illnesses.

6 In 2005, he was awarded the James
7 D. Bruce Memorial Award by the American
8 College of Physicians for distinguished
9 contributions in preventive medicine, in
10 recognition of this and subsequent work in
11 food safety.

12 He has served on seven National
13 Academy of Sciences expert committees dealing
14 with food safety, and served for four years as
15 a member of the Institute of Medicine's Food
16 and Nutrition Board. He has published over
17 200 papers in peer-reviewed journals, and has
18 had continuous federal grant funding since
19 '84.

20 He currently serves as the
21 University's PI for the Florida Integrated
22 Food Safety Center of Excellence, one of five

1 such centers established nationally under the
2 Food Safety Modernization Act. Thank you for
3 joining us, Dr. Morris.

4 DR. MORRIS: Thanks. It's a
5 pleasure being here. After that introduction,
6 I'm not sure I can say anything else. But,
7 again, it's a pleasure to be able to meet with
8 the Board today.

9 What I'd like to do is perhaps
10 bring in a perspective from that of an
11 infectious disease physician, and I will say
12 that I continue to see patients in infectious
13 disease, and that one of the major problems
14 facing medicine today is the rapid emergence
15 of resistant strains.

16 As you may be aware, we have
17 significant problems in terms of development
18 of new antibiotics, and we are seeing rapidly
19 rising levels of resistance across multiple
20 pathogens.

21 Speaking as a clinician, there is
22 a strong motivation to do everything that we

1 can to try to minimize the risk that further
2 resistance genes, resistant strains may move
3 into human populations, because right at the
4 moment, we've got a problem on our hands which
5 we are having a lot of trouble handling.

6 What I'd like to do just very
7 briefly is to run through some basic concepts
8 which I think are applicable to this
9 particular discussion. And again, to kind of
10 come back to the basics, to get antibiotic
11 resistance, you really need two things.

12 You need the gene. You need a
13 resistance gene. Resistance genes may arise
14 spontaneously within strains due to mutations.
15 But generally, resistance genes move among
16 bacteria, and they move very easily and very
17 readily on a variety of different transposable
18 elements.

19 Bacteria are highly promiscuous.
20 They spread their genes all over the place,
21 and as I will talk in a minute, many of our
22 studies have clearly shown that when you have

1 a situation where there is selective pressure,
2 that movement of genes is something that
3 happens with great ease.

4 And again, the second point here
5 is the presence of evolutionary selective
6 pressure, specifically the presence of
7 antibiotics, which provide an evolutionary
8 survival advantage to strains that can resist
9 killing by antibiotics.

10 And again, in these instances,
11 probably the most critical thing is the
12 presence of antibiotics at sub-therapeutic
13 levels. In other words, just enough to give
14 a little bit of a survival advantage to
15 strains that do carry resistance genes, as
16 opposed to strains that are either killed by
17 it or, you know, strains that have, you know,
18 are not able to really compete as well as
19 those that do carry the resistance markers.

20 If somebody could advance these
21 slides. Sorry about that.

22 Let me just give you an example,

1 and again I recognize that here we're talking
2 animals and not plants, orchards as we are
3 here. But nonetheless, just to give you a
4 flavor of what we tend to observe, this is a
5 study we did a couple of years ago in a Hog
6 CAFO, where there were sub-therapeutic levels
7 of tetracycline being used as part of the
8 feed.

9 What we did was go in and
10 essentially culture everything in sight.
11 Soil, water, you name it, we cultured it, up
12 to a half a mile radius away from the CAFO.
13 What we found was tetracycline-resistant
14 bacteria from all sites at all time points
15 sampled, including samples collected half a
16 mile away from the CAFO.

17 We found that among E. coli, 77
18 percent were tetracycline-resistant, and among
19 enterococci, 68 percent were tetracycline-
20 resistant. We then said, okay, where are
21 these genes moving? What strains, species?

22 What we found was the tetracycline

1 resistance was present in strains from 26
2 bacterial genera and 60 species. Basically,
3 the tetracycline resistance had moved into
4 virtually everything. We were able to
5 identify ten known tetracycline resistance
6 genes, which accounted for approximately 60
7 percent of the resistant strains identified.

8 We found that strains carry up to
9 five different tetracycline resistance genes
10 at one time. I would point out that this
11 means that there were 40 percent of the
12 resistant strains where we did not identify a
13 known resistance gene, where we actually -- we
14 did not go through and attempt to sequence the
15 strains, so we're not sure what the basis was
16 for resistance in those particular strains.

17 I guess the picture I want to
18 paint here is that when you have a setting
19 where there is sub-therapeutic use of
20 tetracycline, what you get is within the
21 entire, you know, sort of within an island
22 around the area where the tetracycline is

1 being used, you get high levels of
2 tetracycline resistance, because for the
3 bacteria in those areas, even very, very small
4 levels of sub-therapeutic tetracycline, are
5 sufficient to select out for resistant strains
6 and to facilitate the movement of resistance
7 genes.

8 The fact is there are lots of
9 tetracycline resistance genes, and a lot of
10 unknown tetracycline resistance genes. In
11 fact, one of our major concerns is the
12 development of new resistance genes, that then
13 have the potential for moving into populations
14 of bacteria in that environment.

15 So how do you get resistance from
16 the environment into something on four feet,
17 or in particular on two feet? And I think
18 that there have been, at this point, multiple
19 studies that it occurs readily among persons
20 with exposure to animals or animal
21 environments, where sub-therapeutic
22 antibiotics were used in feed.

1 Stuart Levy's original studies 30
2 years ago were still some of the best around,
3 and basically what he did was show that when
4 they started use of tetracycline in feed in
5 chickens, that basically for the majority of
6 families on farms where tetracycline was used,
7 greater than 80 percent of the fecal coliforms
8 in the intestinal tract were tet-resistant.

9 This was obviously significantly
10 much higher in the farms where no tetracycline
11 was used. There are clearly now have been
12 multiple studies documenting transfer of
13 specific resistance genes from animals and
14 humans.

15 I think the point to emphasize
16 here is that I'm really not concerned about
17 movement of a resistance gene, you know, on
18 the blossom into a human pathogen. What I'm
19 really concerned about is the overall
20 generation and spread of tetracycline
21 resistance genes, and ultimately the entry of
22 these genes into the bacterial communities

1 that are on animals and humans.

2 Again, I think what we have
3 discovered with the studies that have been
4 done, particularly with the increasing
5 capabilities in terms of genetic studies,
6 you've got more bacterial cells on you than
7 you have cells in your body.

8 Bacteria are all over you, inside
9 you, and what the real concern is the overall
10 level of resistance that one sees in these
11 commensal bacterial populations. What then
12 happens is that when you are given
13 antibiotics, if the genes are present even in
14 numbers that cannot be readily detected, then
15 they will rapidly expand and move into
16 pathogens, which in turn can cause serious
17 disease.

18 So again, my concern is not the
19 pathogen. My concern is the overall impact of
20 the resistance genes on the commensal
21 population. And again, there was a very
22 interesting study, again part of the same, I

1 believe the same cluster of studies that Dr.
2 Stockwell mentioned, where studies were done
3 where pastures were sprayed with streptomycin
4 at concentrations used in orchards.

5 What they found was that 39
6 percent of the intestinal E. coli were
7 resistant in animals that were, that were on
8 sprayed fields, versus 22 percent on animals
9 on control fields. And resistant E. coli were
10 in many instances multi-drug resistant.

11 So again, what this does is simply
12 reinforce this concept that the concern is the
13 overall level of resistance within commensal
14 organisms, and even at the low levels seen in
15 spraying in orchards, it has been possible to
16 demonstrate in animal populations that one
17 sees a dramatic increase in overall levels of
18 resistance within commensal bacteria.

19 So to kind of pull it all
20 together, anti-microbial resistance is a
21 critical and increasing problem in clinical
22 medicine. And again, speaking as a clinician,

1 this is going to become, is becoming one of
2 the biggest problems we've got in medicine.

3 Tetracycline remains an important
4 clinical drug. It is listed as "highly
5 important" by the World Health Organization.
6 There are a variety of pathogens where I use
7 tetracycline on a regular basis.

8 One that comes immediately to mind
9 is that there are a lot of strains of MRSA,
10 where tetracycline is my drug of choice, in
11 terms of treatment, because again these are
12 strains that have built up resistance to just
13 about everything else.

14 The major risk for human infection
15 is the presence of resistance genes strains in
16 the body's normal microbial flora, on the
17 intestine and skin. So again, the concern is
18 not the acquisition of resistance genes by
19 human pathogens in the field; the concern is
20 the amplification of resistance genes and
21 potentially selection of new, previously
22 unrecognized resistance genes, and then the

1 potential for movement of those strains into
2 human populations.

3 I would point out that we have
4 done mathematical models, looking at, you
5 know, kind of how much does it take. Again,
6 what the models show is that even if it's a
7 very rare event, when one actually gets
8 movement of a gene or a new gene into a human
9 commensal population, once it gets into human
10 commensal populations and, you know, with
11 antibiotic use in humans, one can then get
12 rapid amplification and movement and spread.

13 So again, even very rare events
14 are important in terms of the overall ecology
15 of resistance in commensal bacteria in humans
16 and in animals.

17 Finally, the transfer of resistant
18 gene strains from the environmental sources to
19 humans and human microbial flora is well-
20 documented. It definitely happens.

21 I think, again, a lot of these
22 data are in an animal CAFO situation. As

1 pointed out by Dr. Stockwell, we have a
2 situation here where applications are less in
3 an orchard setting.

4 But I think, again, my concern is
5 that, you know, every time you're using
6 tetracycline you are presenting an opportunity
7 for the development of new resistance genes,
8 and/or the amplification of resistance genes
9 and potential to transfer those into humans,
10 either via animals or directly into humans,
11 workers in the area, you know, potentially on
12 product, and again, it's not like you have to
13 have a lot.

14 What the models say is a very,
15 very rare event is enough to have significant
16 impact in terms of long-term risk within human
17 populations. Thank you.

18 MEMBER FELDMAN: Thank you, Dr.
19 Morris. So our plan now is to open -- and
20 thank you to the whole panel. We really
21 appreciate you coming out for this. It really
22 helps us as we work through these critical and

1 serious issues. I guess the point -- we're at
2 the point now in the program where we will
3 entertain questions of the Board members to
4 the panelists.

5 So the floor is open to anybody
6 who has questions. Do you want me to manage
7 this? Is that -- okay. Okay. Any questions
8 from the Board members?

9 CHAIRMAN STONE: Harold.

10 MEMBER AUSTIN: First off, I thank
11 all of you for taking the time out of your
12 busy schedules to come in and be a part of our
13 day today. It's an important decision that we
14 all are going to be participating in later on.

15 Dr. Morris, this question's going
16 to be directed to you. Looking at your
17 presentation and some of your slides that you
18 had out there, part of the information that
19 you showed showed, you know, hog farm
20 applications made over a covered crop, also
21 using streptomycin.

22 I mean, really our topic is

1 antibiotics, but it's really focused on
2 oxytetracycline.

3 Do you have any working knowledge,
4 firsthand information dealing with our
5 environments in the tree fruit area,
6 physically dealing with, specifically dealing
7 with the oxytetracycline and the effects that
8 it would have, similar as what you've just
9 been talking about?

10 DR. MORRIS: As Dr. Stockwell
11 pointed out, there are some studies that are
12 beginning to come out. We have not worked
13 directly in the orchard environment. I would
14 say that the concern is that, given what we
15 know about the animal environment, there are
16 concerns that the basic concepts are also
17 going to be applicable to an orchard
18 environment.

19 You know, the obvious answer
20 always is, well, we need more studies. The
21 problem is these studies are very difficult.
22 As I pointed out, particularly in the CAFO

1 study, they really have to be done at a
2 genetic level. They take time. One really
3 needs to be sampling both human populations
4 and the basically everything in the orchard
5 environment. And they are very expensive.

6 So consequently, you know, the
7 question is are there sufficient data
8 extrapolating from other settings to be able
9 to move forward? What I would say is I think
10 that there are sufficient data extrapolating
11 from other settings.

12 But I will also say it is
13 extrapolating from other settings. And again,
14 as Dr. Stockwell has pointed out, we are
15 beginning to see some data coming out. There
16 is, you know, there is a need for additional
17 data. The question is do we go ahead and move
18 forward at this point and stop the usage,
19 given the data that we do have?

20 I think if you say we wait for
21 more studies, we are potentially talking years
22 and a lot of money. And again, while I'm not

1 speaking officially for IDS, for the
2 Infectious Disease Society of America, I
3 believe there is a letter from IDSA in your
4 docket, and again the feeling very strongly
5 from the Infectious Disease Society for
6 America is, you know, it's time to do it now.

7 MEMBER RICHARDSON: Dr. Johnson,
8 you talked a little bit about the Blossom
9 Protect and the copper-based material that --
10 one of which is presently available, the first
11 one, Blossom, and we're waiting on the second
12 one.

13 Are these two materials the same
14 as or similar to the materials that are being
15 used in Europe for fire blight control? And
16 second part of the same question, have these
17 two materials, as part of an integrated
18 approach, been found to be effective in fire
19 blight control?

20 DR. JOHNSON: Yeah, I think the
21 answer to that is yes. I can't say I'm an
22 expert on fire blight control in Europe. I

1 have had some conversations with some Swiss
2 researchers about sort of the boots on the
3 ground control of fire blight in apples.

4 My feeling is that some of the
5 areas that apples are grown in Switzerland
6 aren't at especially high risk for fire
7 blight, but they do have it, and they've
8 learned to fight it.

9 They have some products that we
10 don't have, and I think I was asked this on
11 the webinar. But they do have Blossom
12 Protect, and they're using it. Coppers, I
13 believe, are not allowed in the EU. I guess
14 I'm just sort of saying that. I'm not
15 positive about that, but my feeling is that
16 I'm not sure that -- maybe Virginia has some
17 closer colleagues who could answer that. But
18 I'm not sure why they use coppers, are in the
19 EU.

20 They have another product that's
21 actually a ground up stone material, kind of
22 like a mineral material, and they'll put that

1 on flowers pretty heavily. I think it's
2 fairly expensive and I think it works sort of
3 in, I think, some of the smaller scale organic
4 situations in Europe.

5 I don't think that in our larger
6 scale farms that we really wanted to go that
7 direction. We do have a -- there is some
8 stone materials used. Kaolin clay is used in
9 apple production in Washington, and it's used
10 primarily as a preseason treatment for insect
11 control, and it works fairly well.

12 I don't know if you were ever in,
13 say, Wenatchee in the first two weeks of
14 March. You'll see all the trees look kind of
15 ghost-white. It's kind of an interesting and
16 pretty experience, and they put clay on.

17 And we've done some work with that
18 for fire blight control. It sort of works,
19 sort of doesn't, and it's sort of a lot of
20 material. You have to put on say 100 pounds
21 per acre to get it to work. So that's kind of
22 the extent of my knowledge of fire blight

1 control in Europe.

2 When I was up there was a meeting,
3 International Organic Tree Fruit group in
4 Leavenworth, Washington last June, and that's
5 where I really talked some of this with some
6 Swiss tree fruit people. That's kind of how
7 they presented it to me, and they were pretty
8 interested in what we were doing with Blossom
9 Protect.

10 They did frown a little bit. They
11 said our ability to use copper probably isn't
12 as easy as it is for you. So our ability in
13 the U.S. to use copper is probably a little
14 bit easier than it is to use in the EU.

15 MEMBER FELDMAN: Other questions?
16 John.

17 MEMBER FOSTER: So I think, Dr.
18 Johnson, this will be for you. I'm
19 interested, could you talk more about kind of
20 the timing of the EPA registration process --
21 and that's one thing. But I guess more
22 concern to me is the time it takes from there

1 to get it into kind of actual use in the
2 field, and what you anticipate relative to
3 these alternatives, which look really
4 promising and I think they will be. But it's
5 the timing issue that I'm more concerned
6 about.

7 DR. JOHNSON: Yeah. Well, I've
8 been around this long enough to say that the
9 EPA is pretty unpredictable about these kinds
10 of things. Some things take a long time and
11 some things don't.

12 I would have to say that something
13 like copper sulfate mixed with, you know,
14 seaweed extract, or whatever the exact
15 formulation is, probably will have a fairly
16 fast track because there are many copper
17 sulfates that are already registered through
18 the EPA.

19 It's not really, I don't think,
20 new chemistry or new molecules, and I think
21 that the toxicology and that kind of thing is
22 going to be pretty well known when the

1 application is made. So my guess would be
2 that it would go through fairly quickly.

3 And the company has told me that
4 it would be this summer but, you know, I don't
5 -- I mean, I don't have a more definitive
6 answer than that, and I guess we're just sort
7 of waiting on that.

8 MEMBER FOSTER: So part is that
9 process, but then also how is that -- it's one
10 thing to have it registered; it's another to
11 get it into use.

12 DR. JOHNSON: Right, yeah.

13 MEMBER FOSTER: And in a diverse
14 growing community --

15 DR. JOHNSON: Yeah. Well, with
16 the Blossom Protect material, we've sort of
17 had the experience with that, though I do
18 think with biological materials, where you
19 have to have a living product in the bag when
20 you sell it to the grower, and they have to
21 spray a living organism, that it's harder to
22 scale up and be ready.

1 I mean, you're anticipating this
2 day when you're going to get this
3 registration. But you can't have so much
4 inventory on hand, because the shelf life is
5 fairly short with a biological product.

6 I think the scale-up could be a
7 little faster with a chemical material like a
8 copper sulfate material. I still think you're
9 looking at the first year that they get it,
10 it's going to be new, and they may have
11 limited inventory, and also they're not going
12 to have that much demand, because the
13 information goes out to the people that have
14 their ear closest to all of this. But there's
15 a lot of people that don't have their ear
16 quite so close.

17 And then -- so I think it really
18 is the second year after the registration,
19 where you see the material start to take off.

20 MEMBER RICHARDSON: Just to follow
21 up, on the webinar I got the distinct
22 impression listening to you that we can

1 control the fire blight without the use of
2 antibiotics.

3 DR. JOHNSON: Well, I think with
4 the materials that we talked about, I think we
5 can get there. Remember, one of my finishing
6 slides was about risks. I do think we change
7 the risks somewhat. I do think that there is
8 some risk that fruit won't finish as well.

9 I think that's a risk. I do think
10 that there's a risk that some people in some
11 places are going to have a tougher time
12 controlling fire blight than others. So
13 that's a risk, so that I think that who is
14 growing organic fruit, say, ten years from
15 now, if oxytet isn't available, will cause
16 some kind of a shift in the people who do it.

17 So but do I think it can be done?
18 Yeah, I think it can be done. But I would
19 really like to see those materials that we
20 talked about be available.

21 MEMBER SONNABEND: My question is
22 for Dr. Stockwell. There's been a bit of

1 controversy within organic community over
2 whether there is residue of tetracycline
3 actually on the fruit from its use in
4 orchards, and when we surveyed the literature
5 in writing our paper, we just found EPA data
6 from I think 2005 that was used as part of the
7 tolerance-setting process.

8 It was unclear to us whether the
9 residues actually had occurred in harvested
10 fruit, and I'm wondering if you could just
11 talk about what you know about residue
12 occurring on fruit, from tetracycline not
13 streptomycin necessarily.

14 DR. STOCKWELL: Right. I also
15 read that EPA report on the registration.
16 That's the information that I have. I don't
17 know of any situations where they had a .35
18 parts per million detection on fruit.

19 But if you think about -- I think
20 the highest amount of residue that they found
21 on one apple or something in that study was
22 .25 parts per million, which if you

1 extrapolate that to like an apple, that would
2 be 35 micrograms, which is -- and if you take
3 an oral dose of like tetracycline, you take
4 250 milligrams, which is -- I can't remember,
5 it's like 5,000 times more, that you're taking
6 a pill, versus what might be on a fruit. So
7 it's very small. But yeah, possibly.

8 DR. MORRIS: I also read the EPA
9 report, and I have your similar hesitation
10 about exactly what they're saying. But, you
11 know, and Dr. Stockwell's completely correct,
12 that in terms of the therapeutic dosage, it is
13 a minuscule amount.

14 But the other side of it is, you
15 know, my concern is really more at an ecologic
16 level, which is that even very, very low doses
17 of an antibiotic are able to cause gradual
18 shifts in population levels of resistance
19 across time, because it means that strains
20 that have some degree of tetracycline
21 resistance have a minuscule, you know, better
22 chance of growing in the presence of very low

1 levels of tetracycline.

2 But that's enough to potentially
3 cause long-term shifts in the overall
4 intestinal ecology. So I will say that even
5 though the levels are extremely low, I think
6 one cannot say, in terms of the intestinal
7 ecology, which is really where I'm coming
8 from, that they have absolutely no effect.

9 MEMBER SONNABEND: Yeah. My
10 question was -- and I do understand what both
11 of you said. But my question was more where
12 did that .25 that they found come from, and is
13 that going to be likely on every apple that
14 was sprayed at bloom time, or could that have
15 been from a spray after bloom, or do we even
16 know those type of things? Has that type of
17 research been conducted?

18 DR. STOCKWELL: It was not clear
19 in that study exactly when that particular
20 fruit, I think, which orchard it came from.
21 I can't remember. But I remember that there
22 was like no clear correlation between number

1 of sprays and the residues, and most of the
2 apples were at below detection levels, which
3 was .013, I think, parts per million.

4 So, yeah, I would like to see
5 actually some really good work done on that.
6 But as far as, you know, the EPA sets their
7 tolerances based on information from the FDA
8 and also clinical studies. And they felt that
9 a tolerance of .35 would cause no harm to the
10 environment or to humans, and that's if every
11 apple was contaminated at that level, which
12 hasn't happened.

13 MEMBER FAVRE: My question is for
14 Dr. Morris. I'm having trouble reconciling,
15 understanding the process. If we're being
16 told by Dr. Stockwell and Dr. Johnson that
17 oxytet basically degrades within four days of
18 exposure to sunlight in the environment, how
19 is that going to migrate into potential
20 bacterial populations?

21 DR. MORRIS: Again, even within
22 the window of time that it's sprayed, one can

1 have fairly substantial impacts on bacterial
2 populations that are in the immediate
3 environment.

4 The question is how long those
5 effects last, and again as Dr. Stockwell has
6 pointed out, there are starting to be studies
7 that suggest that, you know, populations
8 return back into normal levels within a period
9 of time. A month?

10 MEMBER FAVRE: Like two weeks.

11 DR. MORRIS: Two weeks. So there
12 is, with the use of the tetracycline, there is
13 a clear perturbation of the environmental
14 bacterial populations. And again, as I said,
15 what our data suggests and I think what most
16 people would agree is that, one, it's fairly
17 widespread.

18 But then it sort of trails off.
19 I guess my concern is that what our
20 mathematical models suggest is that, you know,
21 even if one is seeing only temporary
22 perturbations, there still -- what it does is

1 increase the opportunity for resistant
2 organisms to get into the environment,
3 potentially to come in contact with humans or
4 through various environmental routes.

5 Again, what I'm in many ways most
6 concerned about is the genetic material, which
7 is the actually the tetracycline resistance
8 genes, and the possibility actually of
9 developing or selecting for new genes, which
10 might not have been previously present.

11 So most of the time, it will have
12 no effect. But again what the models say is
13 that even in a very, very rare instance they
14 do have an effect, it can long-term have a
15 significant impact on human populations,
16 because once they enter into human
17 populations, then they are much more readily
18 transmitted among humans.

19 Then once you get somebody with
20 one of those genes and their intestinal tract
21 into a hospital, potentially undergoing cancer
22 chemotherapy, then suddenly what will happen

1 is that those genes will move into serious
2 pathogens, and one really then starts to get
3 into problems.

4 MEMBER FAVRE: Okay. I guess sort
5 of a follow-up question to that then is, as
6 we're looking at this specifically for organic
7 production by all accounts is, what, less than
8 ten percent of the overall fruit tree
9 production, the impact that we can make on
10 this board by either allowing this material to
11 sunset in 2014 or extending it, whatever we
12 end up deciding here today, is that going to
13 make a significant impact in the overall use
14 of oxytet in fruit production, not
15 specifically organic?

16 DR. MORRIS: I can't speak about
17 the overall fruit production. I can say that
18 the approach that we have started to take
19 increasingly, given the significant problems
20 we're encountering in human medicine, is we
21 need to try to limit or eliminate use in all
22 instances, because all of this -- and again,

1 even though, you know, what difference does it
2 make? Well, there is a remote possibility
3 that one could get selection of new
4 tetracycline resistance gene tomorrow, when
5 you spray, and that that could then move into
6 human populations with devastating impact.

7 Again, it's a very, very rare
8 event. But what's fascinating is that when
9 you work with the mathematical models, even
10 very, very rare events can clearly have
11 significant downstream populations because of
12 the potential for amplification once they get
13 into the human intestinal flora.

14 And again, that's our concern.
15 It's not movement into a human pathogen, but
16 movement into the overall ecology of your
17 intestinal flora, where it may not even be
18 detectable until you are in a setting where
19 suddenly antibiotics are administered, and
20 where suddenly you become very susceptible to
21 farther infection.

22 MEMBER THICKE: I think this is a

1 very interesting discussion about the levels,
2 low levels, sub-therapeutic. I think,
3 however, if you look at it from -- if you use
4 Avogadro's number and calculate 250 parts per
5 billion, it's interesting.

6 One part per billion will end up
7 to be that apple will have about 10 to the
8 15th molecules of antibiotics in it, or about
9 ten quadrillion molecules of antibiotics will
10 be in that. Now, whether that's significant
11 or not, it's astounding, though, to realize
12 that. That's why I wanted to bring that out.

13 MEMBER MARAVELL: Yes. At the
14 risk of showing my lack of knowledge, I'm
15 going to disclose that I do not produce any
16 tree fruit, but I'm going to ask some
17 questions of the panel.

18 Dr. Johnson, is there any way, if
19 I were a tree fruit producer, and we were
20 having a quote-unquote perfect storm of
21 circumstances for the development of the fire
22 blight pathogen, is there any way for me to

1 make a positive ID of the presence of that
2 pathogen in my orchard in time for me to
3 provide sort of a curative or preventative or
4 a static type of treatment?

5 DR. JOHNSON: Well, yeah. That's
6 another research question that we like to work
7 on. We have developed some techniques for
8 scouting orchards for the development of the
9 fire blight pathogen in flowers, before they
10 reach the really major stages of activity
11 where you would get a major perfect storm or
12 epidemic.

13 We've developed the molecular
14 technologies to do that. The problem right
15 now is waiting for the detection technology
16 that can implement that molecular technology
17 to catch up, and the simple analogy would be
18 to say can we make this as easy as a home
19 pregnancy test or something like that, and the
20 answer is not yet.

21 But at some point down the road, I
22 think that that's going to be possible. But

1 I think we're talking more like a decade or
2 something like that.

3 There's some instrumentation
4 that's coming down the road that is allowing
5 for portable molecular tests to be done, and
6 it's called Point of Care use of molecular
7 testing.

8 I think that at some point in the
9 future, that will be done routinely in
10 orchards for the fire blight pathogen, and
11 we've kind of been at the forefront of that in
12 developing technology to do that.

13 And we do it now in our research
14 objectives, and for example, that work with
15 pre-bloom sanitation with copper in
16 California, we are employing a molecular
17 detection technology to tell when the fire
18 blight pathogen is in flowers.

19 But right now, the flowers all
20 come to my lab and my technician works night
21 and day to get the samples processed, and
22 we're only working in, you know, a half a

1 dozen orchards and things like that.

2 So we don't feel like having some
3 facility where everybody mails their flowers
4 in would be sufficient, because it would
5 overwhelm, and it's very much a needle and a
6 haystack problem to find it.

7 So the only way we feel that
8 people could do that would be actually to do
9 it themselves, or have a service, a local
10 service do it, and they would need these
11 onsite instruments that could do that.

12 So I think your question's a good
13 one and I do think it's coming, but I think
14 we're looking probably at maybe ten years down
15 the road.

16 MEMBER MARAVELL: If that
17 technology were available, and now we're in
18 the hypothetical, would it be ever useful to
19 determine whether or not the treatments that
20 you had undertaken, having gone through all
21 the processes that Brenda outlined for us,
22 were being successful, and you would not have

1 to treat? I know it's a difficult question.

2 DR. JOHNSON: Yeah. I've worked
3 with a couple of growers up in Central
4 Washington, where we're doing this for them,
5 and one grower in particular wanted me to say
6 treat or not to treat. Our experience with,
7 it's not so much a technology problem, but
8 it's more of a sampling problem.

9 So if you're looking for needles
10 in haystacks, and fire blights, if the
11 temperatures -- the bacterium itself, if the
12 temperatures are such, it can double two,
13 three, four times a day, and the number can
14 jump, and your flower pickers are out there in
15 the cool of the morning and by mid-afternoon.

16 So it's a little bit nervous to
17 say that yeah, we could just, you know, give
18 you a prescription for an orchard and say
19 "treat," and I guess I don't feel like we're
20 confident enough in the science at that point.
21 I think the technology would be useful for
22 looking at say sentinel orchards, or knowing

1 when it's active --

2 You know, we've learned a lot in
3 the last say three, four years, just kind of
4 this understanding of when it's active and
5 what's the pattern of build-up in the flowers.
6 I think because of that, we've actually
7 changed not just organic but conventional
8 practices in fire blight control somewhat, and
9 gotten people to kind of, you know, hang on a
10 second.

11 It's not going to be exploding on
12 you today or tomorrow. But as we get near the
13 end of bloom, that's when you're really going
14 to have a serious issue.

15 So we've done a lot of that kind
16 of work, and so I think we'd have to do a lot
17 more sampling and get a lot more confidence in
18 our sampling protocols before we would be
19 saying okay, today you could spray, you know,
20 copper, or today you could spray
21 oxytetracycline or even the harder question to
22 us, no, you don't need to spray, you know.

1 What we've really found by doing
2 these surveys and doing this, running these
3 molecular acids is that the models work. The
4 models are pretty good, and in terms of
5 telling people when they have a risk problem.

6 In the areas we've been working in
7 in California, this is now in California
8 primarily, you know, the pathogen builds up in
9 those orchards most every year, but it doesn't
10 get to really high numbers until you get to
11 fairly late bloom.

12 So you know, at some point I think
13 that people would say, you know, I don't know
14 if I want to do that test, because I know
15 what's going to happen, and I probably would
16 agree with them. So but it's been very useful
17 to do it as a research problem.

18 MEMBER FELDMAN: John.

19 MEMBER FOSTER: Brenda, I think
20 this might be your deal here. I'm fuzzy on
21 how copper is handled in the EU, relative to
22 certification materials approval. Can you

1 clarify that for me? How is that done
2 differently, and what lessons can we learn
3 that might be applicable here?

4 MS. BOOK: I don't know how much I
5 can expand on it, because we don't evaluate to
6 the EU specifically. But when we did, the EU
7 standard for copper is an absolute. It's a
8 certain amount per hectare that you can apply,
9 which differs from our standard.

10 What Ken mentioned earlier,
11 talking to the folks that are in the EU, it is
12 more difficult for them to use a copper
13 product over there, because they have an
14 absolute, versus ours is as long as there's
15 no, you know, accumulation in the soil.

16 MEMBER FELDMAN: Dr. Morris, I
17 wanted to ask you a question about the World
18 Health Organization rating of tetracycline in
19 specific, because it sounds like we're talking
20 about this chemical as if it were a normal
21 pesticide that didn't intersect with
22 protection against human diseases.

1 Could you put that into context
2 for us, in terms of how this specific material
3 is viewed in the world context of protecting
4 human health?

5 DR. MORRIS: Tetracycline is a --
6 it's an important drug. It's an older drug.
7 We have a great deal of experience with it.
8 It is a drug that we use here in the United
9 States for fairly selective instances,
10 particularly as I say, I probably use it most
11 commonly in something like MRSA, because for
12 outpatient treatment, sometimes our options
13 are limited, and most of the other drugs that
14 are currently -- are still available tend to
15 be relatively toxic.

16 At a global level, tetracycline is
17 an extremely important drug. There are a
18 variety of diseases where it is either the
19 only agent which is effective, or it's an
20 agent which is by far the preferred agent.

21 A fair amount of my research deals
22 with cholera. For cholera, tetracycline is

1 clearly the number one drug. It's not
2 something that we're necessarily going to get
3 here in the United States.

4 But nonetheless, what I would say
5 is here, on a global level, tetracycline is
6 an important drug, and consequently, at least
7 within the professional community, within
8 those of us who practice infectious diseases,
9 it's one of those drugs, and again based on
10 the WHO ranking, is a highly important drug.

11 It's one of these drugs that we
12 want to try to do everything in our power to
13 try to minimize further enhancement of
14 resistance.

15 MEMBER AUSTIN: Ken, Dr. Johnson,
16 most of the research is -- that you've been
17 working with is really it's been looking at
18 the Blossom Protect and then looking ahead at
19 that later stage of development with the
20 copper that Gowan's coming with, the Previsto.

21 I was just informed at lunch time
22 by Glenn Foster with Gowan that EPA has pushed

1 the registration process for that back into
2 August 2014. What impact will that have with
3 our proposal, you know, more of an organic
4 approach to replacing tetracycline in your
5 trials and actually then with the growers
6 themselves?

7 DR. JOHNSON: So that's August
8 2014 now is the -- or 2013.

9 MEMBER AUSTIN: August 2014.

10 DR. JOHNSON: Oh, okay. Well, so
11 now we're talking about, if the sunset is at
12 the end of 2014, then if the product is
13 registered, we would have a very short period
14 of time to have people ready for the 2015
15 season.

16 My own feeling about all of the
17 things that we've worked on is that that
18 copper material is fairly essential to being
19 able to control fire blight, and as I said in
20 my opening remarks, not so much -- well, both
21 during the primary bloom period.

22 But I said a lot of our problems

1 in fire blight extend beyond the primary bloom
2 period, and the biological material like
3 Blossom Protect or the other materials that
4 are out there like Serenade and things like
5 that, they have value during the bloom period,
6 but they don't have that much value in this
7 post-bloom period and the period during the
8 summer when, if you get fire blight in your
9 orchard and you're trying to get it back in
10 check, you need a material that you can spray
11 out there, that will kill bacteria.

12 This Previsto product has that
13 potential. It's a good bactericide in the
14 testing that's done and has been primarily
15 done by Tim Smith up in Wenatchee, is that the
16 Previsto has done a better job than this new
17 formulation of copper sulfate. It's doing a
18 better job than the older formulations of
19 coppers.

20 So we think it's a good material
21 and would have the best fit in that period of
22 bloom, when or after bloom when fire blight

1 gets kind of messy and can do a lot of damage.
2 So we'd have a real short period of time to
3 get people up to speed, and I think that --

4 I mean here again, we're talking
5 about a chemical and not a biological. I
6 think that the company would have a better
7 chance of being ready itself, and I think that
8 the word would have to go out very quickly in
9 the sheds and all that, that supply growers
10 with material would have to get ready.

11 You know, I think, you know, we've
12 been on the trail on this, out there speaking
13 quite a bit, and I don't think it's going to
14 be a problem of not, of people not really
15 knowing about it. You've just got this kind
16 of logistical issue, getting people up to
17 speed and knowing and being ready.

18 MEMBER FELDMAN: Final questions.
19 Yes.

20 MEMBER SONNABEND: Dr. Johnson, we
21 heard from some people's testimonies that Dr.
22 Sundin in Michigan did research for several

1 years, showing that Blossom Protect did not
2 work very well at all in Michigan, and we were
3 wondering, I was wondering if you knew what
4 they're going to do, what they're going to try
5 next or, you know, what options they have.

6 DR. JOHNSON: That was the
7 question I forgot to answer during the first
8 part. So there's a couple of ways to answer
9 that question.

10 Just if you have an apple flower
11 in Michigan or if you had an apple flower in
12 Washington, I don't think there's a reason
13 that Blossom Protect wouldn't work in
14 Michigan, as opposed to Washington.

15 I mean there's not a difference in
16 the flowers per se. I know George pretty
17 well. I know that he worked with it in 2011,
18 and he did publish a report, and he had fairly
19 good results with it in 2011. In 2012, they
20 pretty much got froze out in Michigan, so they
21 didn't get any, really any data last year.

22 Biologicals have never been a real

1 strong emphasis of George's program, so that
2 their testing with Blossom Protect has been
3 fairly limited.

4 I think the bigger issues for
5 Michigan growers are climatic ones, and the
6 two things that affect fire blight control in
7 Michigan are the speed at which spring
8 happens, and it's faster than it is out west
9 here. They have warmer nights and bloom
10 happens very quickly, and so they have to be
11 ready to go and they have to move fast.

12 That's number one, and the second
13 one is that they have apple scab, and apple
14 scab is probably a bigger problem for them
15 than fire blight. So all through the bloom
16 period, they are putting on materials for
17 apple scab. So they're putting on materials
18 that are suppressing the growth of fungi, and
19 as yeast is a fungus.

20 So they're very concerned that if
21 they're in the middle of an apple scab program
22 that if they put this yeast on, that they're

1 going to have difficulty establishing
2 effective populations of the yeast on flowers.

3 I can't say that I've seen any
4 research to say one way or the other what the
5 result of that is, and I do think it is a
6 concern. I got some trials out that I'm going
7 to put out here in a couple of weeks, looking
8 at sulfur before and after Blossom Protect, to
9 see if we can get a little better
10 understanding of that.

11 But again, we're still really just
12 learning about the material. The advantage
13 that we have in the west with Blossom Protect
14 is that it's dry, and we don't worry about
15 scab very much in most of the production
16 areas.

17 MEMBER SONNABEND: In the
18 Northwest, not in California though.

19 DR. JOHNSON: It's true, yes, and
20 in California and in pears in particular, we
21 do worry about scab more, as we saw from the
22 Mount Adams guys telling us about pear scab

1 the other day.

2 In pears in California, Dan Goff
3 was a grower down near Lake Port. He's an
4 organic grower of pears, and I had an email
5 exchange with him just the other day about
6 this, him and Brock Soller about this, about
7 how to put on sulfur and try to integrate it
8 with Blossom Protect.

9 It's still, we're just kind of
10 feeling our way through it, and we're actually
11 going to get the samples after I'm a little
12 less busy, and look and see what his success
13 was in establishing this yeast on his pear
14 fruit, on his pear flowers.

15 MEMBER FELDMAN: One last
16 question, and it goes to this question of
17 persistence. We, in our technical review, and
18 I guess this is for anyone on the Panel that
19 can touch it, but tetracycline, it says
20 "Tetracycline can persist in soil for long
21 periods of time, without showing antimicrobial
22 activity, and high concentrations can be

1 achieved. Upon later release from soil
2 components, it can exhibit antimicrobial
3 activity."

4 So it gets bound up in the soil,
5 and it says "factors that may result in
6 release of tetracycline from soil includes
7 changes in organic material composition,
8 shifts in microorganism populations, or
9 changes in soil pH." Is that, does that make
10 sense? Anybody?

11 DR. STOCKWELL: No. You'd expect
12 some degradation through hydrolysis of the
13 compound. I mean it could be bound to soil
14 particles, but through exposure to
15 microorganisms and other things, it should
16 degrade.

17 MEMBER FELDMAN: Well, I'm just
18 citing. There are a couple of citations here
19 on that point.

20 DR. STOCKWELL: Yeah. That was a
21 -- I think you're talking about the Chandler
22 study or something.

1 MEMBER FELDMAN: Agar Poposka.

2 DR. STOCKWELL: Oh, Poposki?

3 Okay.

4 MEMBER FELDMAN: Well, Poposka it
5 says here, et al.

6 DR. STOCKWELL: Yeah. They didn't
7 actually study that. So they're just
8 speculating. So that's a comment on the
9 discussion, but they actually didn't -- I
10 don't think they actually looked at the --
11 they didn't do any chemistry in that study.
12 So --

13 MEMBER FELDMAN: Okay. Thank you
14 all very much for participating in this.
15 Appreciate it.

16 CHAIRMAN STONE: Thank y'all very
17 much. We appreciate your coming and attention
18 to help us with the, wrestle with this
19 decision here. So Jay, just a little bit of
20 a time check. The way we have it outlined,
21 we've scheduled 30 minutes for the Board to
22 discuss three proposals, and then the balance

1 of the afternoon is basically three hours
2 that's scheduled for public testimony, at five
3 minutes each.

4 So just depending on how that
5 goes, if we have some -- if it went like
6 yesterday, we may have a little time for some
7 questions, but not very much. So if you want
8 to go work through this 30 minute Board
9 discussion and go part-way into public
10 comments before we break at 3:15.

11 MEMBER FELDMAN: Okay. So as
12 y'all know, we have a majority/minority
13 position, and Harold is going to present his
14 slides, right? So Harold's going to present
15 the majority opinion with the --

16 MEMBER AUSTIN: Yeah, Jay. I'll
17 present the proposal, a brief history and then
18 I'll start the majority, and then Zea will
19 finish that part of it. We're going to do it
20 together.

21 MEMBER FELDMAN: Do you want to
22 read the petition?

1 DR. BRINES: I can do the brief
2 introduction, sure. So the tetracycline
3 petition was received on June 11th, 2012. It
4 was a joint submission by three parties, the
5 Washington State Horticultural Association,
6 the California Pear Advisory Board and the
7 U.S. Apple Association.

8 The petition requests an amendment
9 to the annotation for tetracycline at 205.601
10 on the National List. So the current listing
11 is under paragraph (I) as plant disease
12 control. Number 12 reads tetracycline for
13 fire blight control in apples and pears only,
14 until October 21st, 2014.

15 In support of the review, the
16 Crops Subcommittee reviewed the previous
17 technical report that was available for
18 tetracycline. So there was no new report, but
19 the previous report was completed in 2011.
20 There was also a previous report done in 2006.

21 Both the petition, the previous
22 technical reports and the Subcommittee

1 proposals were all posted on the NOP website
2 in advance of the opening of the public
3 comment period for this meeting. Thanks.

4 MEMBER FELDMAN: Thank you.
5 Before we jump into the conversation and
6 presentation, I guess there are maybe some
7 members that want to talk about their
8 potential conflicts of interest, or address
9 disclosure of interests. So who wants to
10 start with that? Go ahead, thank you.

11 MEMBER SONNABEND: Okay. I do, I
12 know there's a lot of debate about conflict of
13 interest, but I do feel it's important for the
14 public to, at least for me to be transparent
15 to the public about my interest that I may or
16 may not have on the subjects before the Crop
17 Subcommittee.

18 So with that in mind, I do want to
19 state that I work for a certifier who may or
20 may not certify products that have any of the
21 materials that we are considering before us
22 today used on them, and I do grow apples. But

1 I do not use tetracycline in my orchard, nor
2 do I plan to.

3 To accuse me of a conflict of
4 interest when I do not use the material I feel
5 is inappropriate. Thank you.

6 MEMBER FELDMAN: Thank you.
7 Harold.

8 MEMBER AUSTIN: Yeah. I have two
9 points to make the public aware of, as my
10 declaration, and I do not feel that I do have
11 a conflict of interest, because I'm here to
12 represent stakeholders. That's what we're all
13 here for.

14 First, as part of the petition,
15 prior to being appointed to the Board, there
16 is a letter of support on behalf of my
17 company, written by myself, that is there, and
18 that's posted and that's full public
19 disclosure.

20 Also, my company that I work for,
21 we are organic and conventional apple, pear,
22 cherry, blueberry, wine grape growers, and we

1 use tetracycline on part of our acreage. We
2 use it not on a lot of our acreage.

3 We brought this up in discussion
4 with the full Subcommittee, Crops
5 Subcommittee. It was decided that we did not
6 have a conflict, I did not have a conflict at
7 that time. But we moved that forward. Jay
8 moved that forward to the program to make a
9 decision, and the decision came back that they
10 saw no conflict, as far as they were
11 concerned.

12 MEMBER FELDMAN: Thank you. We've
13 gotten all those administrative matters --
14 okay, go ahead.

15 CHAIRMAN STONE: Let me just
16 confirm that the Executive Committee also
17 vetted the decision of the Subcommittee, the
18 lack of those conflicts.

19 MR. McEVOY: To just reiterate,
20 from the Program's perspective, the members of
21 the Board are here to represent their
22 stakeholders. There's no disproportionate

1 benefit that the members receive. So
2 therefore, all the members of the Board do not
3 have an interest that constitutes a conflict
4 that they need to recuse themselves.

5 So we looked at specifically
6 Harold's and Zea's situation, and they do not
7 need to recuse themselves on this particular
8 topic.

9 MEMBER FELDMAN: Thank you. The
10 floor is yours, Harold.

11 MEMBER AUSTIN: All right. We're
12 a little tight on time, so we'll try to move
13 this along as rapidly as possible. We do have
14 a proposal on oxytetracycline. We did receive
15 a petition to remove it from the, with the
16 October 21st expiration date.

17 The original petition was to
18 actually relist it back into the sunset
19 process.

20 The Crops Subcommittee decided
21 that since it had already been removed, that
22 we would -- we did not like that option or

1 that we did not like that as an option, and we
2 chose to, based off of the knowledge that we
3 had, that there was research being done,
4 knowing that this Committee, this Board
5 actually in 2011 in Seattle, challenged the
6 industry to go forward, start to make changes,
7 come back to this Board with a petition, if
8 they felt that they needed an extension, which
9 is essentially what had taken place.

10 So we moved forward with a new
11 proposed expiration date of October 21st,
12 2016, and this would be used for both apples
13 and pears for control of fire blight. We've
14 got a resolution, which I'll read in a minute,
15 as we get down further into the motion.

16 The petition to the National
17 Organic Standards Board was received for the
18 removal of the expiration date, and we just
19 described that. Because this is such a --
20 this subject is so complex, we presented a
21 proposal that was essentially 40 pages, I
22 believe. That thing changed and morphed about

1 16 times with the Subcommittee.

2 But I think we ended up with a
3 document that got posted, that read at about
4 40 pages, trying to lay out for the community
5 and the stakeholders. It's a little bit
6 complex. It's a little bit big. But we tried
7 to take and lay out a history of what has
8 happened with oxytetracycline, and
9 streptomycin was a part of that decision
10 previously.

11 Also, after the history then we
12 went into a strong presentation with both the
13 majority opinion and then also a very indepth
14 description of the minority opinion. We felt
15 that that was the proper way to approach this,
16 because this is such a complex issue. There's
17 a lot of dynamics in play, and we needed to
18 make sure that all of the stakeholders felt
19 that the information being presented to the
20 public represented each and every side of this
21 discussion.

22 So we hope that that was achieved,

1 and I probably, I don't know. The Program
2 hasn't told us, but it was probably the
3 longest proposal that they've ever received.
4 If not, it gives us something to shoot for.
5 I just don't want to be a part of the next
6 one.

7 Okay. All right. Moving down
8 into the actual motion itself, Crops
9 Subcommittee moved the motion forward to amend
10 the listing of tetracycline to remove the
11 expiration date of October 21st, 2014, add the
12 following annotation: That 205.601, synthetic
13 substances allowed for use in organic crop
14 production, as a plant disease control, 12
15 tetracycline for fire blight control in apples
16 and pears only until October 21st, 2016.

17 That moved out of the Subcommittee
18 to where we are today by a motion of five
19 yes's, three no's and no absences and no
20 abstains.

21 We did further accompany that with
22 a resolution, and the resolution reads that

1 "The National Organic Standards Board is
2 committed to the phase out of this material.
3 The Board urges growers and certifiers between
4 now and the 2016 proposed expiration date, to
5 encourage an annual increase in the extent
6 and/or number of alternative practices that
7 are trialed for controlling fire blight.

8 "In addition, the Board strongly
9 supports increased support for the research in
10 these alternative practices and materials."
11 That carried out of Subcommittee to the full
12 Board, 7 yeses, 0 no, 1 absent.

13 Here we go. Okay. Written public
14 comments that we received back, 320.
15 Supporting the majority position for an
16 extension of the expiration date, 35, and that
17 included Bluebird Coop, which had 27 growers
18 on their petition.

19 Supporting the minority position
20 against an extension of expiration date, 281.
21 We had several large petitions that were
22 submitted electronically. OCA, 24,016

1 signatures; FWW, 6,544 signatures; CFS, their
2 petition had 24,545 signatures.

3 Supporting the centralist proposal
4 that was proposed by NOC, Co-Op Partners
5 Warehouse, Organic Produce Wholesalers
6 Coalition, Organically Grown Company,
7 Veritable Vegetable, Northwest Organic Dairy
8 Producers Alliance.

9 Organizations for and/or agencies
10 supporting the majority opinion for some sort
11 of an extension include MOSA, OFTA. Just for
12 the sake of saving a little bit of time, I'm
13 not going to read through all of the groups,
14 but I will read a little bit of the comments.

15 "OTA is committed to the use of
16 antibiotics in organic apple and pear
17 production. 2017 expiration date will support
18 current research and testing, allow for grower
19 education and success. Expiration dates need
20 to be based on research-based time lines, not
21 political compromise.

22 "OTA supports the Subcommittee

1 resolution. OTA also recognizes the role
2 organic agriculture can play in developing an
3 approach that will ultimately be adopted in
4 conventional orchards as well."

5 Organizations, agencies supporting
6 the majority opinion or type of extension.

7 "MOSA believes that the proposal to extend the
8 expiration date to 2016 doesn't go far enough,
9 in allowing time for development of equivalent
10 alternatives for fire blight control."

11 Recommends that "the NOSB consider grower
12 input."

13 NWHC. Acid oxytetracycline be
14 retained on the National List or relisted
15 until viable and proven alternatives are
16 identified. Arbitrarily established
17 expiration dates do not provide a solution to
18 the organic industry and its various
19 stakeholder groups.

20 Oregon Tilth urges the NOSB to
21 consider a sunset date that is based on
22 realistic expectations for current research to

1 draw statistically significant conclusions.
2 They do not support the inclusion of
3 annotations that reiterate existing standards.

4 UNFI, representing 7,000
5 associates, 27,000 customers and I will say
6 that this is a statement that they gave us.
7 This is not a signed petition that they
8 submitted, supports a 2017 expiration date,
9 based on research-based time lines, not
10 political compromise.

11 Albert's Organics 2012 sales for
12 Northwest organic apples alone were almost \$16
13 million. This is a critical organic sales
14 category for them.

15 CF Fresh. This is not a debate
16 about substances used to grow prettier or
17 larger fruit, to increase storage life, or for
18 the convenience of organic growers. This is
19 about actual life of the trees, and by
20 extension, the livelihood of growers and
21 workers, their families and the communities.

22 OTFA. Long term solutions

1 discussions should include currently no viable
2 alternative to antibiotics for post-blossom
3 infection fire blight control. Blossom
4 Protect does not work in Michigan's climate.
5 Blight resistance, root stocks and tolerant
6 cultivars are not a solution to this problem
7 at all.

8 Objections to the use of
9 antibiotics for fire blight control tend to be
10 philosophical, rather than scientifically
11 based.

12 Organizations, agencies supporting
13 the majority continued. California Natural
14 Products, a very promising research program,
15 OREI, will not be ready for use by the organic
16 farmers and conventional farmers until 2017,
17 giving these pioneering farmers and
18 researchers the time they need to bring this
19 to a successful organic conclusion.

20 General comments. "We apple
21 growers cannot grow organic apples on a
22 commercial scale without antibiotics at this

1 time. After testifying at the Seattle
2 meeting, Spring 2011, I walked away losing
3 faith in the democratic process being a good,
4 fair and compromising system, which makes
5 regulatory decisions based on good science and
6 common sense instead of politics.

7 "I returned to my farm. I started
8 preparing to transition my food production and
9 processing back into conventional food stream.
10 We are now a split operation."

11 "Fire blight is one of the
12 principal limiting factors of pear production
13 in California. I'm a producer of organic
14 pears in the Lake County district in the North
15 coastal mountain areas of California.

16 Supporting the centralist
17 position, NOC had proposed a three point
18 centrist proposal. Co-Op Partners, Warehouse,
19 I've already mentioned those a little bit.
20 Specific use annotations to document grower's
21 movement upward in the disease management and
22 add a resolution detailing how oversight from

1 certifiers in the NOP would be carried out.

2 Alternative proposal.

3 Cornucopia's position. While opposed to the
4 majority opinion and in full support of the
5 minority opinion, Cornucopia is willing to
6 consider another proposal.

7 They recognize that due to the
8 high susceptibility of fire blight that pears
9 have, that the fact that there has been
10 relatively little research done on
11 alternatives to antibiotics on pears, that the
12 regulations may need to be different for pears
13 compared to apples.

14 They would support removal of
15 antibiotics from apples production 2014
16 expiration date, without impacting pear
17 growers, while more continued research could
18 be conducted. There wasn't a time frame
19 submitted to that. I don't know if you guys
20 will make further comment on that or not.
21 Okay. Support of the minority opinion.
22 Opposed to an extension of the expiration

1 date.

2 Consumers Union. The goal of OFPA
3 was to apply consistency to the organic label.
4 Food and Water Watch. The prophylactic use of
5 antibiotics contributes to the growing
6 reservoir of antibiotic resistant bacteria in
7 the environment, which has been identified by
8 medical authorities as critical threat to
9 public health.

10 Advocacy groups supporting
11 Minority Opinion 20, Consumers Union, BP, CFS,
12 PIER, several more, Cornucopia and several
13 more. Support of the minority opinion,
14 continued. Beyond Pesticides stresses the
15 importance of antibiotic resistance. They
16 state that the majority opinion is contrary to
17 prevailing medical and scientific opinion.

18 Tetracycline use poses significant
19 health and environmental threats. It is
20 incompatible with a system of organic and
21 sustainable agriculture. There are numerous
22 individual comments submitted in support of

1 Beyond Pesticides, and we have several
2 supporting that position.

3 Johns Hopkins University. To
4 protect public health, the NOSB should allow
5 the authorized use of oxytetracycline to
6 expire next year as scheduled. General
7 comment. Please keep antibiotics out of
8 apples and pears, and any other organic fruits
9 and vegetables.

10 Antibiotics should not be in or
11 used on any food, especially that which is
12 marked as organic. No synthetics should be
13 allowed of any kind.

14 Continued support of the minority.
15 There were many individual comments stating
16 that antibiotics do not belong in organic
17 production. Keep all synthetics out. Please
18 keep our food safe, and numerous generic and
19 form letter types of these comments were
20 presented to us.

21 Key points of discussion. Zea,
22 when I get to your slides, yell at me so I

1 don't -- I may just keep going.

2 OREI. Research will not be
3 completed by the current 2014 expiration date.
4 What impact will the 2014 expiration date have
5 versus allowing for specific extension, in
6 allowing completion of the trial work and
7 transition of these programs physically out to
8 the grower spray programs for actual use?

9 So taking them out of the trial
10 status and moving them out physically into the
11 real world, out into actually growers putting
12 these materials on. There are several
13 suggestions to extend the date that we have
14 received, ranging anywhere from 2017 all the
15 way out to 2023.

16 Does the current system provide
17 adequate oversight? Annual inspections,
18 organic systems plans in place. Certifiers
19 ensuring that all the necessary steps leading
20 up to the use of the tetracycline have been
21 met prior to an application being made.

22 If an extension is agreed upon, is

1 any further restrictions truly needed, and
2 would they even be able to be implemented in
3 a timely enough manner to be of any help?
4 What are the actual facts of antibiotic use in
5 tree fruit on human health and the
6 environmental impacts, and I think our panel
7 was able to take and give us a little
8 disclosure on some of that.

9 Do they exist, don't they? At
10 what levels? What could be done to help
11 mitigate these concerns, if an extension is
12 granted to help with consumer confidence in
13 organic?

14 All sectors of the organic
15 community agree that antibiotics need to be
16 moved from organic use, and are committed to
17 doing so? It's just a matter of when the
18 phaseout should be.

19 Can a compromise be made that
20 allows all organic stakeholders to share in
21 the decision, and ultimately the victory that
22 OFPA worked as it was intended to? Allow a

1 substance of use added to the National List,
2 reviewed as required by law, and ultimately
3 that material then was removed when the
4 appropriate organic replacements became
5 available.

6 Are we truly there yet? Arriving
7 at that point in time is something that all
8 organic stakeholders will be able to take
9 pride in. OFPA worked, as designed.

10 MEMBER SONNABEND: Okay. I'm
11 offering some talking points in support of the
12 majority position for an extension.

13 OFPA clearly stipulates that the
14 NOSB review each material by specific use and
15 application. Provisions in OFPA against
16 antibiotics are only stated for animals.
17 Nowhere in OFPA is there a prohibition against
18 use in crops.

19 It's never been a secret that
20 tetracycline has been approved for fire
21 blight, that has been public record since
22 1995. We posed the question whose

1 responsibility is it to notify consumers of
2 what the organic rules actually are? Perhaps
3 it's the groups that represent them.

4 Satisfying consumer expectations
5 is not on one of the criteria in OFPA, nor in
6 the federal rule, although it is one of 12
7 criteria for assessing compatibility in the
8 NOSB policy and procedures manual. But there
9 are 11 others. How does this work? Thank
10 you.

11 The claim that every time someone
12 bites an organic apple, you take in
13 tetracycline is not true. Many organic apples
14 each year are grown without tetracycline.
15 Other statements in both the majority and the
16 minority position can be challenged and
17 debated at length, without anyone changing
18 their mind.

19 So in the spirit of moving
20 forward, we've laid out all of our positions
21 in both minority and majority in the written
22 document, and we all agree that finding the

1 best way to remove tetracycline from use,
2 while trying to create a viable way for fruit
3 growers to continue to produce organic crops
4 is our goal.

5 Right now, there are not suitable
6 alternative practices that work in all
7 locations for both apples and pears.

8 Blossom Protect has shown to be
9 works well in Washington and Oregon, has not
10 been tested enough in California, and does not
11 seem to work in Michigan, and we don't know
12 about New York, North Carolina, Wisconsin and
13 any number of other states where apples and
14 pears are grown.

15 There was 2,000 acres available
16 for 2013 and we're not sure of the
17 availability in the future. The new copper
18 product, Previsto, Harold has just talked
19 about. It's not registered, seems to be
20 pushed back.

21 Limited years and locations of
22 trials means limited information on the timing

1 of applications between these products and
2 other materials used for scab or other pests.
3 Limited experience and differing weather
4 patterns and microclimates and limited
5 experience to small test products and not
6 major acreage.

7 The industry does not plan to
8 submit any further petitions. The NOSB
9 majority investigated how to indicate this by
10 resolution, but the NOP was not able to
11 support such a resolution because in the
12 rules, anyone has the right to petition at any
13 time.

14 Therefore, we are simply stating
15 this clearly on the record. The industry does
16 not plan to submit future petitions.

17 The NOSB Crops Committee discussed
18 possible annotations to put further
19 restrictions on growers and ACAs for
20 alternative practices and oversight, but could
21 not agree that being redundant to what is
22 already part of the ACA and grower procedures

1 would be worthwhile in an annotation.

2 Therefore, a second resolution has
3 been proposed to address oversight as well as
4 research needs. What we are looking for is a
5 level playing field for growers in all states.
6 We want to provide U.S. consumers with USA-
7 grown organic fruit.

8 The majority of the NOSB Crop
9 Subcommittee believes that an extension to
10 2016 is a good compromise between the needs of
11 growers for alternative materials and
12 practices, and the expectation of consumers
13 that organic fruit be grown without
14 antibiotics and produced in the USA. Thank
15 you.

16 MEMBER FELDMAN: Thank you. So a
17 time check here. We have a minority position
18 as well that you should have access to in
19 written form. I'm not going to go through
20 these slides at this point, given the limited
21 time. I hope everyone has a chance to look at
22 these.

1 But I do want to say, I think Dr.
2 Morris really did capture the urgency of the
3 need to evaluate the impact of continued
4 tetracycline use.

5 Yes, we have to balance the need
6 for this material, but we also have to really
7 seriously evaluate the impact of the material
8 on human health and the environment,
9 compatibility with organic practices and
10 essentiality.

11 This is a complex issue, as you've
12 said Harold and, you know, there are multiple
13 complex factors that come together. The
14 confluence of these issues is almost
15 extraordinary, and you know, starting with the
16 impacts on the environment and contribution to
17 horizontal gene transfer, how that makes its
18 way up the chain, across the chain and
19 ultimately affects our ability as human beings
20 to deal with human pathogens and respond to
21 them in a clinical setting.

22 The subtherapeutic uses are

1 actually the worst uses in this context. We
2 can't rely on the typical scenario that we
3 think about when we're introducing a synthetic
4 material into the environment, that dose makes
5 the poison or it's very little, or we're an
6 insignificant percentage of overall
7 agricultural production.

8 We really have to look at the
9 mechanism at work here, as was described to
10 us. When we're talking about actual exposure
11 direct through the finished fruit, we have
12 nothing else to go on but what the EPA
13 utilizes as part of its protocol for
14 evaluating residues.

15 The document that's referenced in
16 our technical review is not a study; it's an
17 EPA protocol for setting tolerances. That's
18 what we do when we determine that we need an
19 enforceable level in the fields and after
20 production, to determine whether something is
21 violative of the level that the agency, for
22 better or worse, determines is acceptable.

1 And by the way, when EPA registers
2 a pesticide and allows an acceptable level,
3 they don't call it safe. It's not allowed to
4 be called safe. It's allowed to be called, as
5 having an acceptable risk. This is where the
6 Organic Foods Production Act differs
7 significantly from the Federal Insecticide,
8 Fungicide and Rodenticide Act.

9 We have a very different standard.
10 We're trying to advance systems that don't
11 integrate hazards, and the conventional side
12 is trying to integrate hazards by mitigating
13 risks. It's a totally -- it flips everything
14 on its side.

15 So when the minority looked at
16 antibiotic resistance in human pathogens,
17 ultimately as a result of commensal bacterial
18 resistance at very low levels for short
19 periods of time, for long periods of time in
20 other cases.

21 Even if there's disagreement on
22 some interpretation of some of the studies, we

1 still have use in the fields, exposure to
2 bacteria, identification of bacterial
3 resistance as a result of its use in the
4 field, and then the cycle of impact on human
5 health down the road.

6 I close by saying that we're not
7 just dealing with another input in
8 agriculture. We're dealing with an input that
9 is unfortunately related to a world crisis in
10 bacterial resistance, and organic needs -- the
11 minority believes that organic is the sector
12 of agriculture that must lead on questions
13 like this, always must lead.

14 It can't hide in the shadow of
15 being a small percentage of overall
16 agricultural production. It must serve as a
17 leader for where agricultural production needs
18 to go. So that's the underlying premise and
19 Mac, I apologize. We are now behind schedule.

20 We have two other materials to get
21 to. As you know, we have polyoxin D zinc.
22 What I'd like to do, if we could just take

1 five minutes at this point, is have the
2 leaders on that, if it's acceptable to you
3 guys, to just break down what the vote was,
4 and a couple of sentences on where the
5 majority and minority is on the particular
6 issue.

7 So for IBA, if you could just tell
8 us what the vote in Subcommittee was, and then
9 give us a sentence or two, and then Harold,
10 John will go first, if that's okay? Give
11 Harold a break or - okay, Harold. You're
12 ready now? I didn't want to impose on you
13 further. Lisa, I apologize.

14 DR. BRINES: That's all right,
15 Jay.

16 MEMBER FELDMAN: Okay, go ahead.

17 DR. BRINES: Thank you. The
18 petition for polyoxin D zinc salt was received
19 by the Program on March 4th, 2012. There were
20 a couple of updates in the interim. It was
21 submitted by Conn and Smith, Inc., on behalf
22 of Kaken Pharmaceutical Company Limited.

1 The petition requests the addition
2 of polyoxin D zinc salt to Section 205.601 of
3 the National List, to control and suppress
4 fungal diseases in organic crops. The
5 substance does not appear elsewhere in the
6 National List.

7 In support of its review, the
8 Crops Subcommittee requested the development
9 of a third party technical evaluation report.
10 That report was developed and provided to the
11 Subcommittee in 2012.

12 Both the technical report, the
13 original petition and two subsequent petition
14 addenda were posted on the NOP website in
15 advance of the opening of the public comment
16 period. Thank you.

17 MEMBER AUSTIN: Okay. We
18 received, the Crop Subcommittee received the
19 petition to list polyoxin D zinc salt as a
20 synthetic substance to be allowed for use in
21 organic crop production under 205.601.

22 It's a material that's derived

1 from streptomyces, classified as a fungicide
2 rather than an antibiotic. It's a funginistic
3 form of action. The Crops Committee, voting
4 to classify it as a synthetic, 8 yes, 0 no, no
5 abstentions, no abstains.

6 The listing motion to add polyoxin
7 D zinc salt to the National List 205.601 as a
8 synthetic substance allowed for use in organic
9 crop production. 3 yes, 4 no, 1 abstention.

10 The rationale behind the majority
11 vote to not list it was that it was not
12 essential, that it was a broad spectrum
13 fungicide, and that there were concerns with
14 its impact on soil, biological and fungal
15 activity and also predacious predators.

16 The minority position was that it
17 was a FRAC-19 fungicide. It was funginistic,
18 fungistatic activity, so it did not physically
19 kill the fungi. It inhibited cytokine
20 development.

21 We did have some concerns, though,
22 on its impact on beneficials, that I still

1 think that even the minority did not quite get
2 all of their questions answered as well. So
3 I think that's all I've got for the moment.
4 We'll hand it over to Lisa.

5 MEMBER FELDMAN: Thank you, Jean,
6 and thank you Harold. John, you're up next,
7 but I'm going to go to Lisa first. Thank you.

8 DR. BRINES: Thank you, Jay. The
9 next petition on the agenda is indole-3-
10 butyric acid, also known as IBA.

11 This petition was received on
12 August 8, 2012, and was submitted by Hortis,
13 and as some of you in the audience may recall,
14 this substance was previously petitioned
15 before the Board in 2009, and the Board made
16 its recommendation on the previous petition in
17 November 2011.

18 The petition requests the addition
19 of IBA to Section 205.601 of the National
20 List, for use in plant propagation from
21 cuttings. It is not currently listed
22 elsewhere on the National List.

1 In support of its review this
2 time, the Subcommittee did not request the
3 development of a new technical report, and
4 instead referred to the technical report that
5 was developed in response to the previous
6 petition. So the current technical report
7 that's available is dated 2011.

8 Both that technical report, the
9 previous petition and the petition that's
10 before the Board today were all posted on the
11 NOP website in advance of the opening of the
12 public comment period for this meeting. Thank
13 you.

14 MEMBER FELDMAN: Thank you. John.

15 MEMBER FOSTER: Thank you.

16 Melissa, I think you said about half of what
17 I was going to, so I'll just summarize. The
18 change here over the previous petition was to
19 the method, to limit it to the purpose of
20 plant propagation via dipping this time
21 around.

22 That was the difference. We voted

1 to classify it as petitioned as a synthetic
2 material, 8 to 0, and then to list. The
3 listing motion was to list indole butyric acid
4 or IBA, with its CAS number 133324 as
5 petitioned on 601 for the purpose of plant
6 propagation via dipping. That vote when 3 yes
7 and 5 no, and 0 absent, abstained or recusing.

8 In general, it met the criteria
9 for lack or negligible impact on humans and
10 environment, and then had, on the whole, no's
11 for essentiality and compatibility of
12 consistency. Then the commercial supply was
13 not applicable.

14 MEMBER FELDMAN: Thank you, and I
15 turn the gavel back to you, Mr. Chair. Thank
16 you.

17 CHAIRMAN STONE: Okay. So I think
18 the plan is we'll have a little further
19 discussion about each of these materials as we
20 go through the voting process tomorrow. We'll
21 engage public comment here this afternoon. So
22 we'll further discuss this tomorrow. With

1 that in mind, we remind you that we're here to
2 listen to the public.

3 So I want to work through these
4 questions. Again, it's scheduled at one
5 minute per person for questions, including the
6 time it takes to ask the question.

7 So public commenters, if you see
8 me going like this or like this, that means
9 you're going like this, and you need to be
10 going like this, if you get a question. So
11 it's just in fairness to those that follow you
12 is where this is going.

13 So again, the process is if you're
14 just getting here, there's a little stoplight
15 system on the podium. It's green for three
16 minutes, then yellow for one minute, and then
17 a red light with a beep that indicates time.
18 Everyone's been very respectful of that, and
19 hope you'll continue to do so.

20 I'll call one person to be at the
21 podium, and then the second one is on deck,
22 which means if you'll go ahead and come up

1 towards the front and stand behind Michelle,
2 so that we can rotate in and out of the podium
3 as quickly as possible. I appreciate your
4 assistance on that.

5 So first we have Gerald Davis at
6 the podium, and James Adaskaveg. Excuse me,
7 you can help me with that when you get up
8 here. Gerald.

9 Public Comment/Crops Subcommittee

10 MR. DAVIS: Good afternoon.

11 Gerald Davis, Grimmway Farms out in
12 California. I am ex-NOSB Board member from
13 2005 to 2010, and Crops Subcommittee chair for
14 three years.

15 I reviewed a lot of materials
16 during that time, and voted sometimes to list,
17 sometimes not. I felt I was fair-minded and
18 willing to consider each material, and not
19 just automatically vote one way or the other.

20 I've encouraged that out of this
21 Board. I see the vote on the polyoxin D in
22 the Crop Subcommittee was relatively split.

1 If everyone had voted, I'm sure it would have
2 been exactly split. So I see that the vote
3 for this material will probably be the same
4 for the full Board.

5 Been a long-time crop advisor for
6 Cal Organic, Grimmway, 20 years or more, and
7 a lot of experience with 30 or more crops.
8 What I like about this material is that it's,
9 you know, it is a naturally derived
10 fermentation type product with a twist, which
11 is why the Board is reviewing it. Otherwise,
12 it would just be allowed, because it is a
13 natural. The addition of the zinc salt makes
14 it become synthetic.

15 I like that it works differently.
16 As a grower, it works differently than the
17 other organically approved materials that are
18 already on the market. A lot of the materials
19 on the market are preventive fungicides such
20 as copper or other things, that you pretty
21 much have to predict what diseases you will
22 have and when they will be a problem, and put

1 the material on, if you really want to get
2 control in an area where you have disease
3 pressure.

4 Copper is a problem. In some
5 areas, not in our area in California, but we
6 do use copper. In some areas, they use a lot
7 of it, and it's an environmental problem for
8 organic growers, to be putting on a lot of
9 metallic copper every single year. I see this
10 material as a potential aid in cutting down on
11 that usage of copper.

12 Another thing I like about it, it
13 controls certain diseases that none of the
14 other materials already certified will touch,
15 like Southern blight or sclerotium rolfsii,
16 which is a pest in potatoes, in carrots and
17 potentially in onions. I hear it's a pest in
18 peanuts.

19 This material, from research I've
20 been made aware of, works really well for a
21 disease called alternaria, which would be
22 alternaria leaf blight in carrots is a serious

1 disease, and we deal with it all the time.
2 Alternaria leaf spots in almonds and stone
3 fruit is also a problem for organic growers in
4 certain areas. So this material would be very
5 helpful.

6 Another disease it controls is
7 botrytis in stone fruit and tomatoes. Our
8 farm grows greenhouse tomatoes. Botrytis is
9 not a usual problem. We manage it, you know,
10 environmentally mostly, but it would be nice
11 to have a material to fall back on if we
12 needed it.

13 But I just come as a grower to ask
14 you to seriously consider the material, and
15 not just rule it out based on your biases one
16 way or the other or vote it in, if you're
17 biased towards voting in more materials. Just
18 consider it carefully please. Any questions?

19 CHAIRMAN STONE: Thank you very
20 much. So James and Richard Conn is on deck.

21 MR. ADASKAVEG: I'll thank you for
22 the opportunity to come here today and speak

1 to you about polyoxin D. My name is
2 pronounced Jim Adaskaveg, and I appreciate
3 your concern with pronouncing it. Anyway, I'm
4 a professor at the University of California-
5 Riverside.

6 I study epidemiology and
7 management of fruit and nut tree diseases, and
8 I basically developed the disease management
9 programs for a lot of the tree and fruit nut
10 commodities in California.

11 I work with the statewide UC-IPM
12 pest management program and develop
13 guidelines, and that includes for organic tree
14 fruit and nut production. Thus, I work with
15 the Boards, and Boards still think that I
16 should be developing new products and those
17 products include organic products for that
18 segment of our industry.

19 We do a lot of screening of
20 materials, and identifying organic products is
21 part of our mission goal. Although there's
22 numerous products labeled for tree fruit

1 production that are under organic product
2 listing, things like many different copper
3 formulations and many different natural
4 products.

5 Many of these products have, do
6 not, they represent limited modes of action
7 and are not necessarily, a lot of them might
8 be redundant to each other under the concept
9 of FRAC, of listing materials by mode of
10 action.

11 Many of the products have
12 limitations. Low to moderate efficacy is one
13 of the major concerns. There's potential
14 phytotoxicity with certain products like
15 copper on tree fruit crops, and there's also
16 labeling limitations.

17 So although there's a lot of
18 different products listed, and if you go
19 through the labels, many of them have
20 constraints that prevent their use in a high
21 performance level.

22 Many of these products are

1 overused in my opinion, and so therefore
2 having alternatives will prevent environmental
3 contamination and/or allow for better worker
4 safety. We're concerned with workers and
5 overuse of sulfur products on tree fruit crops
6 and again, this is a concern of why we will
7 need to develop these types of products.

8 So part of our, to get to the
9 point, I've screened a lot of products,
10 hundreds of products over the years. Polyoxin
11 D represents one of the first new biofungicide
12 registrations I helped develop with other
13 companies here in the U.S. or under the EPA
14 registration.

15 As mentioned by Gerald Davis, it's
16 a fermentation product, which is a natural
17 product, and fortunately it was actually
18 evaluated critically for toxicological
19 characteristics and has been recently listed
20 last year as exempt from tolerance by the EPA.

21 It has broad spectrum activity, as
22 most people have recognized, with activity

1 against alternaria, which even conventional
2 materials have a hard time controlling, and
3 for almond production this is essential in
4 California, even for the organic production.

5 One of the revolutionary ideas of
6 using polyoxin D is that we're developing it
7 also for potential use for post-harvest
8 disease control, which there are no materials
9 available in the organic segment for managing
10 post-harvest decays once a crop is harvested.

11 This material, again, has that
12 potential with outstanding efficacy against
13 brown rot and gray mold, which is botrytis.
14 So in summary, I fully endorse the
15 registration of polyoxin D, even under the
16 segment of the synthetic materials approved
17 for organic use. Thank you.

18 CHAIRMAN STONE: Thank you.
19 Questions, Jean.

20 MEMBER RICHARDSON: Yes, I have a
21 question. The technical report, I'm here.

22 MR. ADASKAVEG: Oh, okay. There

1 you are.

2 MEMBER RICHARDSON: The technical
3 report says that this material has the
4 potential to have a negative impact on the
5 beneficial materials in the soil, as it says,
6 beneficial.

7 MR. ADASKAVEG: Fungi.

8 MEMBER RICHARDSON: Fungi in the
9 soils. Do you have any research experience
10 that would help us to better understand that?

11 MR. ADASKAVEG: We deal mainly
12 with foliar diseases, but from our experience,
13 I mean most of these pesticides, including
14 polyoxin D, at the rates we're using them,
15 they are organic compounds in the strict sense
16 of carbon-based. They are degradable, and we
17 don't see long-term persistence or detrimental
18 effects on the vast majority.

19 There is, all these materials,
20 including polyoxin D, has a range of materials
21 or a range of efficacy on different diseases,
22 and it's not going to be a broad spectrum

1 fungicide killing all fungi in the soil.
2 There are microbes that degrade it, and it
3 does not last in a persistent environment.

4 MEMBER FELDMAN: The technical
5 review also says it's long been regarded as an
6 antibiotic because of structure and function.

7 MR. ADASKAVEG: I failed to
8 mention that we actually screened this
9 product. We're also involved with screening,
10 looking for new bactericides such as
11 kasugamycin for fire blight control. We've
12 identified that material, and it's going
13 through the EPA registration.

14 We looked at polyoxin D, and it
15 had no bactericidal effect on the bacterial
16 diseases that occur on tree fruit crops in
17 California. I obviously don't screen against
18 all bacteria.

19 CHAIRMAN STONE: Harold.

20 MEMBER AUSTIN: With the rotation
21 of a new mode of action, fungicide into the
22 organic program if this one was approved, what

1 impact would that have on soil health in
2 quality, because this would then, as you
3 stated, would replace the overuse or the heavy
4 use of coppers, sulfurs, those types of
5 materials.

6 So what would this -- inclusion of
7 this for use, what would this do to soil
8 health and quality?

9 MR. ADASKAVEG: The concerns here
10 are that we don't want to use this
11 exclusively. Resistance, as we know with any
12 product, whether it's antibiotics or
13 fungicides or potential organic materials,
14 resistance can develop, even to copper
15 materials with over-usage.

16 So we're not promoting the
17 exclusive use of polyoxin D, but rather using
18 it in an integrated approach, and we
19 definitely can see that as we screen new
20 materials for organic usage, we want to start
21 with, you know, a foothold with polyoxin D for
22 organic use, and then potentially develop

1 other materials that can be coincidental, other
2 organic materials, fermentation products,
3 other plant extract materials that can be used
4 in concert.

5 As I said earlier, I don't think
6 it's going to have a long term effect. It is
7 degradable material, and with toxicology looks
8 favorable as something that will not persist
9 in the environment and not be totally
10 effective against eliminating soil fungal
11 flora.

12 It's not that broad spectrum.
13 It's broad spectrum in the sense of foliar
14 fungal diseases of and certain diseases of
15 roots on tree crops that I've tested. So I
16 don't think it has that type of long-term
17 persistence and broad spectrum activity to
18 ruin the microflora of, the fungal component
19 of soil microflora.

20 CHAIRMAN STONE: Francis, if
21 you'll finish up.

22 MEMBER THICKE: Yeah. It said in

1 the technical review that the mode of action
2 is that it inhibits the formation of chitin in
3 the maul of fungi, and that makes basically
4 broad spectrum. Would that also affect the
5 beneficial fungi in the soil as well?

6 MR. ADASKAVEG: Yes. The question
7 is exactly correct. That's been the studied
8 mode of action. But there's different types
9 of these chitinases that are being developed
10 by different fungi.

11 They're not all -- chitinase is a
12 general term. They're not all exactly the
13 same. So we do see degrees of activity of
14 polyoxin D against different types of fungi.

15 So for example, we see that it
16 works very well on alternaria and ground root
17 botrytis, but it has no activity on rhizopus,
18 mucor, zero activity, and they're all chitin-
19 producing fungi.

20 So the chitinase, synthase
21 molecules are different between different
22 fungi, and that's the extent of our research

1 on that.

2 MEMBER THICKE: And then relative
3 to persistence, the TR said the half life is
4 32.5 days at pH 7 at 25 degrees Centigrade.
5 Would that be a fairly long persistence?

6 MR. ADASKAVEG: That's considered
7 fairly short, I mean in the sense that
8 depending on how you want to look at it, it's
9 not persisting very long, and your mode of
10 action would be basically if it's a half life,
11 you'd be expecting that to work for disease
12 control, maybe seven to ten days.

13 MEMBER THICKE: I was referring to
14 in terms of soil food web, 32 days of effect
15 on fungi in the soil, food web adapting.

16 MR. ADASKAVEG: Well that's
17 considered very good in microbial beneficials
18 and support, that these things do degrade.
19 That's the time line that was I was
20 suggesting.

21 There are products out there, not
22 to mention anything in specific, but that

1 lasts months in the soil, and this is
2 obviously in that much shorter 32-day time
3 frame. So that's the mind set that I'm coming
4 from, that it is a very short persistence with
5 that type of half life.

6 CHAIRMAN STONE: Thank you.
7 Richard Conn and Cynthia Smith is on deck.

8 MR. CONN: Good afternoon. My
9 name is Richard Conn. I'm the president of
10 Conn and Smith, Incorporated, and Cynthia
11 Smith and I will be speaking today in support
12 of polyoxin D zinc salt.

13 First, I'd like to call to your
14 attention the five submissions that Conn and
15 Smith, Incorporated has made on behalf of
16 polyoxin D zinc salt. First was the revised
17 petition that was submitted March 4th of last
18 year, 2012.

19 Second, was the reply to the
20 technical report that was submitted January
21 18th of this year. The third item was the
22 reply to the Crop Subcommittee's

1 recommendations, submitted on March 6th this
2 year, and then there were four reports
3 regarding the safety to beneficials that was
4 submitted March 22nd of this year.

5 Finally, the fifth item was new
6 data on the safety to earthworms that was
7 submitted on April 4th of this month. So
8 polyoxin D zinc salt is not an antibiotic.
9 The decision to include or exclude polyoxin D
10 zinc salt from organic crop production is a
11 regulatory decision.

12 Only a regulatory definition of
13 antibiotic or antibiotic drug should be used
14 as part of the regulatory decision-making.
15 Otherwise, the regulatory decision would be
16 arbitrary and capricious. Neither antibiotic
17 or antibiotic drug are defined by USDA, NOP,
18 EPA or FIFRA.

19 The Federal Food, Drug and
20 Cosmetic Act defines antibiotic drug and
21 requires intended use in humans or animals.
22 Polyoxin D zinc salt has always been marketed

1 exclusively as a plant protectant. Polyoxin
2 D zinc salt is not and has never been intended
3 for use in humans or animals.

4 Therefore, polyoxin D zinc salt is
5 not an antibiotic, as defined by the Federal
6 Food, Drug and Cosmetic Act. Regarding safety
7 to humans, polyoxin D zinc salt has large
8 margins of safety for humans. The formulation
9 developed for organic market has such low
10 toxicity that EPA does not require a first aid
11 statement.

12 Also, polyoxin D zinc salt has an
13 extensive toxicology database, and EPA has
14 determined that polyoxin D zinc salt does not
15 cause mutations, birth defects, cancer or
16 other long-term health effects.

17 Polyoxin D zinc salt provides
18 broad spectrum control of crop fungal
19 pathogens only. Most of the 73 EPA registered
20 uses are also California registered uses. We
21 request your support for the inclusion of
22 polyoxin D zinc salt in organic crop

1 production. Thank you.

2 CHAIRMAN STONE: Thank you.

3 Harold.

4 MEMBER AUSTIN: We've -- I'm here.

5 We received all of the information that you

6 submitted, the various beneficial data and

7 studies, the earthworm study.

8 The one thing that was missing and

9 the one thing that we were really trying to

10 get further information and declaration on is

11 in the TR report, there is one study that

12 showed there was an incidence where because

13 polyoxin D is a chitin inhibitor, there was a

14 negative impact on I believe it was some type

15 of a roach.

16 Our question is on beneficial

17 insects such as ladybird beetles, those types,

18 we've seen your lacewing studies and some of

19 the others. But very specifically, when we're

20 looking at beneficial insects such as

21 ladybugs, the beetle family that are

22 definitely valuable in our crops, is there a

1 negative impact or not?

2 Does it inhibit during the molting
3 process? Does it inhibit the chitin formation
4 on those types of beneficial insects?

5 MR. CONN: I'm going to defer the
6 answer to Cynthia Smith. She's a lot more
7 familiar with this than I am. Hopefully, she
8 has the answer.

9 MEMBER AUSTIN: Okay, thank you.

10 CHAIRMAN STONE: All right.

11 That's your cue, Cynthia. You're up.

12 MS. SMITH: Thank you and good
13 afternoon. My name is Cynthia Smith. I'm
14 here on behalf of Kaken. I'm the Vice
15 President of Conn and Smith, and I'm also the
16 primary author of the petition.

17 It's probably best to start with
18 the answer to the question that was asked
19 about ladybird beetles. Fundamentally,
20 polyoxin D zinc salt has the mode of action
21 that is specific to cell walls. There are
22 plant cell walls and animals do not have cell

1 walls. They have cell membranes.

2 So the study that you mentioned
3 having to do with cockroaches looked at organs
4 of cockroaches that had been put through a
5 blender and it was done entirely in vitro.
6 There's no evidence whatsoever that there is
7 any efficacy for control of insects using
8 polyoxin D zinc salt, zero evidence
9 whatsoever.

10 Going back to some of the things
11 that were mentioned earlier, the mode of
12 action of polyoxin D zinc salt is it
13 suppresses the formation of chitin synthesis,
14 such that it doesn't kill the fungus; it only
15 stops the growth of the fungus.

16 This is important when you're
17 looking at the environmental impacts, because
18 if you're looking at the impacts on soil
19 health, that effect is a temporary effect. It
20 degrades in the order of 50 percent in the
21 order of a month in the soil.

22 So it will have a temporary effect

1 on the soil microbes, and so you could in fact
2 apply it with something that would be
3 suppressed, but you will get a later
4 beneficial effect. So yes, it might cause
5 lack of growth, but it will not kill the fungi
6 that are naturally occurring in the soil.

7 Now in the way of other non-
8 targets, I'd first like to point out that it
9 is not toxic to be as defined by the
10 Environmental Protection Agency, and then
11 there were some additional studies that were
12 recently submitted, recently translated, and
13 those were on silk worms, hover flies,
14 lacewings and wolf spiders.

15 The thing that's noteworthy there
16 is that one, there was no mortality; two,
17 there was no adverse effects on behavior and
18 for the three beneficial insects. There was
19 no negative impact on the development. So
20 they developed normally from larvae to pupae.

21 Also recently submitted, there's
22 no adverse effects on earthworms. There has

1 been a lot of discussion within the technical
2 report about what happens within the soil and
3 the soil organisms, but again, no adverse
4 effects on earthworms.

5 Another issue that was raised has
6 to do with fish and aquatic invertebrates.
7 Because polyoxin D zinc salt degrades so
8 rapidly in the environment, and because it's
9 applied only to terrestrial crops and only at
10 low use rates, EPA concluded that there would
11 be negligible concentrations of polyoxin D
12 zinc salt in, in this case, drinking water,
13 pond water, reservoirs, rivers.

14 So this is a material that can be
15 very adequately used, safely used with regard
16 to aquatic organisms. Thank you.

17 CHAIRMAN STONE: Thank you. Any
18 questions for -- Francis?

19 MEMBER THICKE: A quick question
20 about the essentiality. Do you see this as an
21 essential need for organic? I'm looking at
22 the TR and there are two pages of alternative

1 products that are approved for organic use,
2 for a whole range of crops and diseases, fungi
3 diseases.

4 MS. SMITH: Well, I would say that
5 yes, it is essential, and the reason for that
6 is that no matter what fungal disease you're
7 looking at, maintaining an environment where
8 you do not establish resistance or do not
9 encourage resistance is important.

10 One of the things that polyoxin
11 does it provides a unique new mode of action,
12 and that uniqueness gives it a special
13 position. Now when we were looking at the
14 spectrum of diseases, there are diseases that
15 are problematic to growers, and polyoxin D
16 zinc salt does provide control of diseases
17 that are otherwise hard to control.

18 Yes, there are a number of
19 products that are registered, but those
20 registered products have only a small number
21 of modes of action, and for those that are
22 registered, there are many instances in which

1 the control will be described as lackluster.

2 So this would give growers an
3 opportunity to in fact gain control, not just
4 prospectively, but many of the products are
5 registered only for as a preventative. But
6 polyoxin D zinc salt is also registered as a
7 curative material.

8 CHAIRMAN STONE: Harold.

9 MEMBER AUSTIN: Yeah. I think part of
10 your petition, and then also from some of the
11 public comment that we got, stated that there
12 were several diseases like I think gummy stem
13 Southern blight, that there were really no
14 true effective alternatives to it, and that
15 this would give those growers an opportunity
16 to come in and have a material that they could
17 use that would be effective, and also it could
18 be applied after the fact, as a curative
19 material.

20 So I have seen that in the
21 comments and in your information that you've
22 provided. One comment in written testimony

1 that raised one concern, and I liked a little
2 bit of clarification, would be on the post-
3 harvest use. What would be the intent, the
4 crops, the timing of the application there,
5 and it looks like it's a fairly safe material.

6 But I think I'd like to see some
7 clarification of the post-harvest direction of
8 the material as well.

9 MS. SMITH: Okay. I prepared the
10 petition to EPA to extend the limited number
11 of tolerance exemptions to all crops, pre-
12 harvest and post-harvest. EPA approved that
13 petition. There are no currently registered
14 uses that are post-harvest.

15 The petition, the tolerance
16 exemption is in place. That gives us the
17 green light to actively develop post-harvest
18 uses, but there are none that are currently
19 registered.

20 I learned over lunch today that
21 there has been research done by another
22 company, that does demonstrate good control in

1 cherries post-harvest.

2 CHAIRMAN STONE: Great. Thank you
3 very much. We appreciate that.

4 MS. STEINER: Thank you.

5 CHAIRMAN STONE: We're going to --
6 we're not too bad, a little bit off. But
7 we're going to take a 12 minute break, be back
8 here at 3:35, and Alexis Baden-Mayer will be
9 first up. If Alexis, you can be here.

10 (Whereupon, the above-entitled
11 matter went off the record at 3:23 p.m. and
12 resumed at 3:36 p.m.)

13 CHAIRMAN STONE: It's time to call
14 the meeting back into session. If I can have
15 the Board members -- I see that. I see who
16 get brownie points later today. May get to
17 ask an extra question, for instance. Tracy's
18 here, gets to ask all the questions she wants.

19 So appreciate everybody. Twelve
20 minutes is hard, and like I said yesterday,
21 the conversation and networking is a big part
22 of our week-long meeting. So if I could ask

1 those in the audience to have a seat please.

2 Okay.

3 So we're back in. We're starting.
4 We have a series. The way Michelle worked
5 these out, we have quite a few presenters on
6 tetracycline specifically. So first up is
7 Alexis Baden-Mayer, and Lynn Coody is on deck.
8 Alexis.

9 MS. BADEN-MAYER: Hello. I'm
10 Alexis Baden-Mayer. I represent the Organic
11 Consumers Association. Most organic consumers
12 do not know that there has been an exception
13 for tetracycline on organic apples and pears
14 since 1995, and obviously no organic consumer
15 would want any organic orchards to be lost.

16 But it's worth pointing out that
17 since 1995, new orchards could have been
18 planted and could have even reached maturity
19 four or five times already. It's pretty easy
20 to understand why consumers would be
21 frustrated at this point by the industry
22 always being given two more years. This has

1 gone on too long.

2 We need to stick to an expiration
3 date for once, and unfortunately honestly I
4 don't believe that that will ever happen if
5 the growers get two years this time, two more
6 years again.

7 Almost 30,000 people have signed
8 our petition now to get antibiotics out of
9 organic apples and pears. The official count
10 is 28,581, and that's after de-duplicating;
11 it's after taking out anyone from overseas.
12 Those are just U.S. residents that gave us a
13 zip code and a state and a name and a comment.

14 5,897 people took the time to
15 write unique comments, and I'd like to read as
16 many of these for you today from the record.
17 My favorite is the most succinct.

18 Blakely Dillar of Ohio says
19 "Antibiotics are for sick people, not for
20 healthy food. But when consumers learn that
21 every time they eat an organic apple or pear,
22 they risk exposing themselves and their gut

1 flora to measurable levels of tetracycline,
2 this means something for certain consumers
3 especially."

4 We have three pages of comments
5 from consumers whose comments begin "I am
6 allergic," and they tell a story of being
7 allergic to antibiotics, and specifically, in
8 some circumstances, tetracycline. Lynn Gorski
9 from Indiana says "I am allergic to
10 tetracycline. Therefore certainly do not want
11 that on my apples."

12 Pat Faith from Michigan says "I am
13 allergic to tetracycline. Since we don't know
14 the producers of the non-antibiotic fruit, I'm
15 in a quandary.

16 How do I know if the organic fruit
17 I purchase had tetracycline used on it? I buy
18 organic because I don't want to worry about
19 the added stuff that is not necessary for food
20 to be produced. I was horrified to hear that
21 antibiotics are being used."

22 Michelle Swisher from Oregon says

1 "I am allergic to tetracycline and all other
2 cyclines, to the point that I can't touch
3 people who are taking it. Now to find out the
4 drug that hurts me is in my food is scary.
5 How often have I been sick from that?"

6 Crystal Stillman from Vermont says
7 "I am a low income single mother of three
8 children. I buy organic food to protect the
9 health of my children. I am horrified to
10 learn that pears and apples advertised as
11 being organic are not really organic, because
12 the government allows them to be sprayed with
13 antibiotics. Please stop this false
14 advertising."

15 Jamie Bennel from Tennessee says
16 "I am a nurse, and try to raise my kids as
17 natural and healthy as possible. Medications,
18 including antibiotics, are used on as
19 sparingly as needed basis, and the more
20 exposure we get to them, the less effective
21 they are. Please allow me the right to choose
22 what goes into my body."

1 Michael Goodman says, from
2 Florida, says "I am a Ph.D. health care
3 professional. For my own benefit, as well as
4 for my clients, I strongly request that my
5 organic food not contain antibiotic residues.
6 This is simply not necessary."

7 Julie Fox from Florida says "I am
8 a registered voter with a severe life-
9 threatening allergy. Please comply. Keep our
10 medications effective and my gut bacteria
11 intact."

12 Nora Gottlieb from North Carolina
13 says "I am allergic to antibiotics. I break
14 out in itching spots with a white center. It
15 takes four months to clear my body. No to
16 antibiotics," and there are almost 6,000
17 comments like that.

18 CHAIRMAN STONE: Thank you,
19 Alexis.

20 MS. BADEN-MAYER: And I delivered
21 them printed out. I've got two copies. I
22 tried to print them out as sparingly as

1 possible, but it fills an entire box and I
2 hope you will rifle through these.

3 CHAIRMAN STONE: Good. Jean.

4 MEMBER RICHARDSON: Hi. No
5 disrespect meant at all, but if you have an
6 article, a scientific article that you found
7 that specifically says that there are -- that
8 tetracycline is in the fruit, the pears or
9 apples, I sure would appreciate that
10 reference.

11 MS. BADEN-MAYER: Well, I did
12 actually include an industry paper, and
13 initially, I didn't realize that residues
14 would be an issue with this, because I was
15 told the blossoms are sprayed and by the time
16 it gets to the fruit, there are no residues.

17 But in the course of looking at
18 this issue, I did find an industry paper
19 that's titled "Antibiotic residues on plant
20 tissues, and actually this same --

21 MEMBER RICHARDSON: Is it on plant
22 tissues or in plant tissues?

1 MS. BADEN-MAYER: Yes, on plant
2 tissues.

3 MEMBER RICHARDSON: On.

4 MS. BADEN-MAYER: And the same
5 figure that's mentioned in this paper was
6 mentioned earlier today. It's a parts per
7 million figure for residues of tetracycline on
8 apples, I believe.

9 I included this along with our
10 comments, and even though this is an industry
11 paper, so it says that there are measurable
12 residues, but it's not a worry, that's not why
13 I'm submitting this paper.

14 I think consumers are worried
15 about residues, and I was completely shocked
16 having first been told that residues weren't
17 an issue, to learn that industry is well aware
18 that there are residues of antibiotics on our
19 food. Not always, but we do have a risk of
20 those residues, and sometimes they're up to a
21 certain amount, and that's in this paper.

22 CHAIRMAN STONE: Okay, thank you.

1 Lynn Coody is up and Jane, excuse me,
2 Bultedaob, Bultidab. You can correct me when
3 you get up. Jane's on deck.

4 MS. COODY: Hi. My name is Lynn
5 Coody, and I'm commenting on behalf of my own
6 business, Organic Agsystems Consulting, which
7 is located in Eugene, and today I would like
8 to speak about the centrist proposal for
9 tetracycline.

10 I've worked on the tetracycline
11 issue many times, beginning in the late 1980's
12 and in this round of work, I first looked at
13 the overarching themes, and came up with my
14 goal for a tetracycline policy, that is, to
15 develop practical and principled production
16 policies.

17 I think it's important for the
18 NOSB to balance practicality and organic
19 principles, because in my years of work on
20 organic standards, I have noted that decisions
21 based too much on either one of the
22 foundations of organic world rarely lead to an

1 outcome that works in both field and the
2 marketplace.

3 At this stage of its evolution,
4 organic agriculture is still described as an
5 alternative to conventional farming. In my
6 mind, a polarized just say no approach is
7 focused too much on principles, and results in
8 some growers having no alternatives but to
9 move toward IPM or conventional production.

10 Decisions based too much on
11 practical considerations can result in
12 consumers searching for alternatives to buying
13 organic products. Worse case, when the policy
14 about a material or practice is crucially
15 important to the success of growers like
16 tetracycline, is based on highly polarized
17 discussions, both production and sales can be
18 put at risk.

19 Clearly, alternative agriculture
20 needs alternative solutions to policymaking.
21 A balanced approach that takes into account
22 the needs and concerns of all stakeholders can

1 provide a way forward, that will foster the
2 stability and continued evolution of organic
3 systems.

4 I'd like to propose three
5 elements, that when taken together, provide a
6 practical and principled approach for a policy
7 on tetracycline. Limited duration extension,
8 annotation and increasing confidence through
9 oversight.

10 So first is extension. I support
11 an extension that ends in October 2016 as
12 proposed by the Crops Subcommittee. This time
13 frame allows four more fire blight cycles for
14 testing management systems and materials, both
15 on research plots and on farms.

16 Further, it ensures that
17 tetracycline will be removed from the National
18 List prior to the date at which it would
19 normally sunset, thus precluding another round
20 of discussion on this contentious topic.

21 I recognize that this time frame
22 is completely insufficient for long term

1 solutions, such as developing and planting
2 varieties and root stocks that are resistant
3 to fire blight.

4 However, I think the intense focus
5 by researchers and growers on new materials
6 and practices will result in innovative
7 practical strategies that can be implemented
8 quickly.

9 Annotation. OFPA provides a
10 unique role for the NOSB in the review of
11 synthetic materials. This authority has
12 always included the ability of the NOSB to
13 recommend limitations to the approved use of
14 a material through annotations.

15 Once an annotation is added to the
16 National List, it creates a direct, legally
17 binding linkage between the NOSB's decision
18 and both the regulation and oversight of the
19 organic industry. Some commenters noted that
20 annotations increased the difficulty of
21 implementing the regulation, and I agree with
22 them.

1 However, I don't think this is
2 necessarily a detriment. In my mind, the
3 increase of regulation, the experience on the
4 ground supports the idea that annotations are
5 a powerful tool for the NOSB to effect change.

6 Oversight. Those of us who work
7 with the NOP standards every day know about
8 the hierarchy of disease control in 205.206,
9 which requires a primary focus on preventative
10 practices.

11 Consumers and marketers have not
12 necessarily been aware of this important part
13 of the NOP regulations. For this reason, I
14 recommend including a few words about
15 oversight in the annotation, in order to
16 reassure consumers about the stringent steps
17 that growers and certifiers must take, to
18 ensure that antibiotics are used only as a
19 last resort.

20 And in my paper, which I passed
21 out, I've proposed an annotation for your
22 consideration. But I don't have time to say

1 it right now.

2 CHAIRMAN STONE: Thank you, Lynn.
3 Zea.

4 MEMBER SONNABEND: Lynn, what
5 annotation do you think would be a good --
6 (Laughter.)

7 MS. COODY: Well Zea, I would --
8 I'll be happy to answer that question. Here's
9 my annotation. Originally, the centrist
10 proposal, the first draft of the centrist
11 proposal had a much more involved and long
12 annotation with the intent of trying to
13 explain to both ends of the spectrum, both the
14 consumer side and the grower side, some of the
15 options that were allowed.

16 We recognized from the start this
17 was way too long for an annotation, so here it
18 is. This is the revised one. "Tetracycline
19 for fire blight control in apples and pears
20 only until October 21st, 2016. Tetracycline
21 may only be used if the grower has implemented
22 an integrated system of practices and

1 materials to control fire blight.

2 "Orchard management systems must
3 demonstrate an annual increase in the extent
4 or number of alternative practices for
5 managing fire blight." So there's three
6 sentences. Each one meets one of the goals
7 that I talked about.

8 One is the, shows the deadline.
9 One is providing oversight, and one is talking
10 about the implementation of Section 206 of the
11 standards.

12 So we have received so many
13 comments from consumer groups that we've
14 worked with, that an annotation is important
15 to them because it is the legally binding
16 option. Other options such as you proposed in
17 the Crop Committee are not legally binding,
18 and having oversight explained, they told --

19 We had feedback from them saying
20 that it would help them a lot, to explain the
21 situation to the consumers, and to show that
22 there is -- to reemphasize that in this

1 particular case, there is strong oversight,
2 even though we all know that it is already in
3 place. So it's just a reiteration.

4 CHAIRMAN STONE: Harold.

5 MEMBER AUSTIN: Lynn, thanks for
6 all the effort that you put forward working on
7 this. The resolution that you came up with,
8 the language for that, you were just talking
9 about some of the consumers and the consumer
10 groups that you had.

11 I'm assuming that this resolution
12 came forward as part of the discussions and
13 the conversations that you had with others?

14 MS. COODY: Yes. I did this work
15 on behalf of the National Organic Coalition,
16 and starting about last August, we made
17 multiple efforts with many, many different
18 parties, both from the consumer, the grower
19 side, all kinds of people within the industry,
20 trying to put together small meetings for them
21 to talk together.

22 This is my interpretation of what

1 I heard from the consumer groups, you know.
2 You've heard a lot of testimony that they
3 didn't know what, that consumers didn't know
4 about this. So in writing this annotation, I
5 tried to give some emphasis that could allow
6 consumer groups to explain the situation a
7 little bit better to consumers.

8 So yeah, this is my interpretation
9 of -- it's my effort to try to have a
10 compromise position that recognizes the
11 concerns of both the consumers and the
12 growers, which are on both ends of the
13 spectrum.

14 CHAIRMAN STONE: Thank you, Lynn.
15 Jane Bultedoab or Jane and your last name
16 starts with a B. If you're in the room,
17 you're up. I didn't see any movement, and
18 there's not signed in. So that means Brian
19 Caldwell. Brian is up, and Michelle Catalano
20 is on deck.

21 MR. CALDWELL: Thanks. I passed
22 around what I called talking points on this

1 issue, and I hope you all have copies and you
2 can just kind of look at them as I'm going
3 through. I'm going to bang through them, so
4 hopefully I can finish in the four minutes.

5 My name is Brian Caldwell from
6 Hemlock Grove Farm in West Danby, New York.
7 I've operated a certified organic apple
8 orchard in Central New York since 1988. It's
9 a part-time operation and my full-time job is
10 doing research on organic vegetable and grain
11 systems at Cornell University.

12 Antibiotics are naturally
13 occurring microbial products, similar in that
14 way to the toxins produced by BT, etcetera,
15 that are commonly used in organic production.

16 But the key issue is that they
17 have a vital role in human health care, and
18 though it appears that antibiotics on fruit at
19 harvest are minuscule, I believe there's a
20 risk that broad-scale spraying of antibiotics
21 over thousands of acres with selection
22 pressure for antibiotic resistance on exposed

1 organisms, especially bacteria, as we heard
2 earlier today.

3 This could potentially increase
4 the chances of transference of antibiotic
5 resistance to human pathogens, and the results
6 of scientific studies on this so far seem to
7 be mixed.

8 When I've asked Northeast
9 consumers about antibiotics in apples, they
10 are unaware that they're allowed to be used,
11 and they are invariably opposed to it.

12 I believe that the continued use
13 of antibiotics in organic production is a real
14 threat to the integrity of the organic label.
15 I want to point out that organic dairy
16 farmers, almost all of whom have transitioned
17 from conventional practices which relied
18 heavily on antibiotics, have given up that
19 practice.

20 Okay. Fire blight is a
21 devastating disease, and I have seen some bad
22 outbreaks, and it does kill trees. It's

1 really nasty. The Northeast pear industry has
2 virtually disappeared and moved to the West
3 Coast because of fire blight. The Northeast
4 has more potential for fire blight than dry
5 Western apple regions.

6 Nonetheless, fire blight has not
7 been a major concern among many organic apple
8 producers in the Northeast. In contrast to an
9 informal West Coast survey, in which large
10 numbers of growers said they would abandon
11 organic production with the loss of
12 antibiotics, and one that I did for Northeast
13 growers, 92 percent of the 12 respondents,
14 it's a small sample, said that it would have
15 little or no effect on their operations.

16 Most of these growers are small
17 scale, but over half of them are full-time
18 diversified farmers. Many, including myself,
19 have never sprayed antibiotics, and why is
20 this? Well, in general, we have far lower
21 reliance on highly susceptible or fire blight-
22 susceptible root stocks and varieties.

1 We tend to use a lower fertility
2 regime. We don't push the young trees so
3 hard, and some growers use early season copper
4 sprays. Some use probiotic sprays during the
5 season, and some use Surround, mostly for
6 insect control, during bloom, and all these
7 may help.

8 I just a little aside here. I
9 think if I wanted to produce fire blight on my
10 farm, and I probably could, I would plant M-9
11 in high density plantings and fertilize them
12 heavily, and I think that would do the trick.
13 But I don't do that.

14 Okay. So I think this is a tough
15 choice. Fire blight pressure is even higher
16 in the Southeast and the Midwest regions than
17 it is in the Pacific Northwest or the
18 Northeast. My orchard is a very small part-
19 time operation, and I don't pretend to speak
20 for larger operators. My investment is very
21 small.

22 Some larger growers have

1 investments of hundreds of thousands of
2 dollars in their orchards, to millions that
3 are at risk from fire blight, and this is a
4 real fact.

5 So I support the centrist proposal
6 on this issue. I believe it gives growers
7 whose orchards are at risk time to adopt non-
8 antibiotic purchase to fire blight, and it
9 ensures consumers that there will be no
10 antibiotic use after a specific date. So
11 thanks very much.

12 CHAIRMAN STONE: Thank you, Brian.
13 Francis.

14 MEMBER THICKE: Thank you, Brian.
15 I have a question. If the deadline for
16 oxytocin -- oxytocin, I'm a dairy farmer --
17 oxytetracycline is extended to 2016, do you
18 think that in the Northeast they will actually
19 do the research and will be in a different
20 place than they are now, or will we be again
21 in the same place by 2016, do you think, in
22 the Northeast?

1 MR. CALDWELL: Well, I don't think
2 there is the heavy research program in the
3 Northeast that Ken Johnson talked about here
4 in the Northwest. But I think, as he said, I
5 think the results will be transferable, at
6 least to some extent, and as I said, I just,
7 at least for a lot of the growers, it's not a
8 huge issue.

9 CHAIRMAN STONE: Jay.

10 MEMBER FELDMAN: Pass. I'm going
11 to pass.

12 MEMBER SONNABEND: Brian, the main
13 difference between the centrist proposal and
14 the proposal we put forward as the majority
15 position is an annotation concerning oversight
16 of certifiers, and a mandate to use more
17 alternative practices than what growers are
18 already trying.

19 Could you explain why you think
20 that makes a difference, to have that as an
21 annotation versus our resolution, to encourage
22 what we think is being already done?

1 MR. CALDWELL: Well, I guess I
2 would agree with Lynn, that it just puts it
3 out there for everybody to see in a very clear
4 way. If it's already being done, I don't see,
5 I guess, why anybody would object to it.

6 CHAIRMAN STONE: Thank you, Brian.

7 MR. CALDWELL: Thanks very much
8 for your great work.

9 CHAIRMAN STONE: Michelle Catalano
10 is at the podium, and we have Pam Coleman on
11 deck.

12 MS. CATALANO: Good afternoon. I
13 represent the Washington State Department of
14 Agriculture's Organic Advisory Board, advisors
15 to our State Organic Food Program. I have
16 served on the board for 13 years as the
17 consumer representative, and currently serve
18 as board chair.

19 The OAB represents stakeholders
20 from all aspects of the organic industry,
21 including producers, processors, handlers,
22 retailers and consumers. The OAB supports the

1 Crops Subcommittee proposal to extend the
2 expiration date for oxytetracycline to October
3 21st, 2016.

4 Along with the rest of the organic
5 industry, the OAB supports a phase-out of
6 antibiotic usage in tree fruit production, and
7 agrees with the Subcommittee that as an
8 industry, we must commit to and prepare for
9 this phase-out, supporting current and new
10 research for alternatives.

11 The two years ending October 2014
12 has not been enough time for research trials
13 to find effective replacements. The OAB
14 disagrees with the arbitrary decision to
15 extend the use of this antibiotic in tree
16 fruit production until October 21st, 2014,
17 rather than to have followed the five year
18 sunset cycle, which would have allowed use of
19 these materials until October 2017.

20 In the case of fire blight,
21 conditions that promote the disease do not
22 exist every year, and so time is needed for

1 researchers to test alternatives under natural
2 conditions.

3 We do, however, applaud the
4 researchers and growers that have been working
5 tirelessly to find alternatives, and strongly
6 believe the NOSB should honor their efforts
7 with this reasonable extension of the
8 expiration date.

9 Industry commitment to a phaseout
10 is evident in current research. It is well-
11 known that organic research is underfunded,
12 yet its importance cannot be understated.
13 Given the potential for entire orchard blocks
14 to be lost to this disease, it is reasonable
15 to allow for the extension of current fire
16 blight management tools, while research for
17 commercially viable alternatives continue.

18 Consumers in our region, in
19 Washington State, enjoy an amazing variety of
20 local organic Washington-grown apples and
21 pears. Yet most do not understand the
22 challenges that growers face, nor do they

1 fully comprehend the complexity of the
2 National Organic Program regulations.

3 The organic industry will continue
4 to grow only if there is growing consumer
5 demand. The OAB believes consumers need more
6 information about the realities that organic
7 farmers face, not bullet points that simplify
8 that reality.

9 While recent public discussion may
10 indicate that antibiotics are heavily used, in
11 truth use in tree fruit production consumes
12 less than one percent of antibiotics sold in
13 the U.S., as per recent Rodale Institute
14 information.

15 WSDA's Organic Food Program and
16 other accredited certifying agencies ensure
17 growers are complying with current organic
18 standards, allowing oxytetracycline when other
19 controls are ineffective.

20 Growers often have to make the
21 choice of which disease to control, leaving
22 them without options during times of severe

1 fire blight outbreak. That forces growers to
2 choose between devastating crop losses or
3 using non-approved materials and potentially
4 losing organic certification.

5 The OAB requests the NOSB allow
6 oxytetracycline to be allowed until October
7 21st, 2016. Given its use at bloom time only,
8 there is no evidence that oxytetracycline
9 leaves residue on post-harvested fruit in
10 amounts greater than EPA allowances.

11 The loss of oxytetracycline in
12 tree fruit production now, when research is
13 making positive strides, unnecessarily
14 jeopardizes the tree fruit industry and risks
15 potential reduction of domestic fruit supply.

16 The continued use of
17 oxytetracycline benefits stakeholders,
18 especially in Washington State, which produces
19 high volumes of organic tree fruit. We wish
20 to see organic acreage continue to increase in
21 our state, and for a diverse variety mix of
22 tree fruit to continue to be available to

1 consumers here and across the country. Thank
2 you very much.

3 CHAIRMAN STONE: Thank you. Thank
4 you very much. Oh, I'm sorry. Harold.
5 Ma'am, we have one more question.

6 MEMBER AUSTIN: No. You're okay,
7 Michelle. Just for the sake of full,
8 absolute, complete transparency, I do serve
9 with Michelle on the Washington State
10 Department of Ag Organic Advisory Board.

11 CHAIRMAN STONE: All right, thanks
12 Harold. Thanks Pam or Michelle. Pam Coleman
13 is up, and Natalie Reitman-White is on deck.

14 MS. COLEMAN: Good afternoon. My
15 name is Pamela Coleman. I'm a policy analyst
16 for the Cornucopia Institute. I have a Ph.D.
17 in Plant Pathology, and post-doctoral research
18 experience on apple diseases. I'm happy to be
19 here to discuss a plant disease.

20 Currently, tetracycline and
21 streptomycin are allowed for fire blight
22 control, only until 2014. Please reject the

1 petition for extension. These antibiotics are
2 not allowed for any other use in organic
3 agriculture, not for livestock, not for crops.

4 It's time for a uniform standard.
5 No antibiotics. In the past few days, you
6 might have gotten the impression that research
7 on control of fire blight has just begun in
8 the past few years. Let me correct that
9 impression.

10 Research on fire blight was
11 published as early as the 1930's, and hundreds
12 of publications have been printed since then.
13 In particular, a great deal of research was
14 done in the 70's, 80's and 90's. That
15 information is available in a farmer-friendly
16 format, as an extension publication that
17 explains how to predict disease outbreaks
18 based on temperature, and how to use cultural
19 controls.

20 My recent review of the current
21 research has convinced me that fire blight can
22 be managed on apples without the use of

1 antibiotics. Many apple and pear growers
2 already succeed without antibiotics.
3 According to a recent survey that we conducted
4 at Cornucopia, and you should have a copy of
5 this survey received in the mail, according to
6 that survey, 56 percent of organic apple
7 growers nationwide who responded said they do
8 not use antibiotics.

9 Only 24 percent of the growers,
10 apple growers, said they used tetracycline.
11 Many growers have not used antibiotics for 10
12 or 15 years. So what are the alternatives?
13 Growers can use cultural practices, resistant
14 varieties, resistant root stocks, blossom
15 thinning, minimum nitrogen and orchard
16 sanitation.

17 If those don't work, growers can
18 use materials, copper sulfate, lime sulfur,
19 fish oils, biological controls. That's a
20 pretty good list. Of course, there is the
21 recent research done by Dr. Ken Johnson, using
22 blossom thinning followed by a biological

1 control.

2 In case you haven't watched the
3 webinar, he said "It provided an excellent
4 level of control. It was as effective as an
5 antibiotic, even on a susceptible apple
6 variety, Galas, and over three years of
7 testing."

8 Of course, that effectiveness of
9 that material depends on an integrated
10 approach. Orchardists must be proactive.
11 They must monitor the orchard and take action
12 to prevent disease outbreaks. That's a basic
13 principle of organic disease management.

14 If orchardists wait until
15 bacterial populations are high, they'll be
16 reactive, and they'll need to spray
17 antibiotics. That's an input substitution
18 mentality, similar to conventional
19 agriculture.

20 Even before this research was
21 done, growers in Washington were growing
22 apples without antibiotics. I inspected many

1 of them. They avoided antibiotics, because
2 they were exporting to Europe, where
3 antibiotics are prohibited on organics.

4 I assure you, they were exporting
5 Galas, Fujis and other popular varieties. I
6 want those apple varieties available to me
7 here in the U.S. without antibiotics.
8 Consumers agree. More than -- consumers
9 agree. Thank you. Sorry.

10 (Laughter.)

11 CHAIRMAN STONE: Thank you, Pam.
12 Question. Jay?

13 MEMBER FELDMAN: So it sounds like
14 you're saying that we may be getting a skewed
15 view of the necessity or essentiality of the
16 materials. What is the method, what was the
17 methodology for your survey?

18 MS. COLEMAN: Okay. We sent the
19 survey out to about 700 growers. We at
20 Cornucopia have a database, and we believe it
21 includes all the organic apple and pear
22 growers. We received replies from 72 apple

1 growers and 32 pear growers.

2 So I reported the apples, because
3 I felt like that was a pretty significant
4 number. I was a little surprised at how many
5 people responded that they don't use
6 antibiotics, because I was concerned that the
7 people who responded would primarily be people
8 who still wanted to use antibiotics.

9 We asked them whether they used
10 streptomycin, tetracycline or either, and we
11 asked them how a prohibition of antibiotics
12 would affect them, and we had different
13 categories. No effect, use more biologicals,
14 stopped growing organics, stopped farming and
15 so forth. Did you want more information on
16 that? Okay.

17 CHAIRMAN STONE: Nick.

18 MEMBER MARAVELL: Thank you, Pam,
19 for your presentation, and let's say for the
20 sake of argument we all agree, which I think
21 most of us do, that there are alternatives and
22 that there are many apple and pear producers

1 who do not use tetracycline and who are
2 certified organic.

3 I'd like to just focus on the ones
4 that do for a second, and say some of the
5 practices that we have heard from the previous
6 speakers and that you've alluded to, may not
7 be in use by those who are still relying on
8 tetracycline.

9 Are you in effect saying that we
10 have enough time for them to make a successful
11 transition away from tetracycline, or do you
12 think that we -- we're admitting this is far
13 less than 100 percent of the producers. Or
14 are we saying that there is indeed a
15 percentage of the producers that are not going
16 to be able to comply with organics?

17 I mean how are you viewing the
18 eventual outcome of your recommendation?

19 MS. COLEMAN: Okay. Can I just
20 talk about apple growers for now?

21 MEMBER MARAVELL: Sure, sure.

22 MS. COLEMAN: Because as Harold

1 pointed out, we have some flexibility with the
2 pear growers. What I'm saying is that we as,
3 must require organic growers to use
4 preventative cultural controls, and what I've
5 seen in Washington State as an inspector is
6 that they're not using them.

7 They should have started using
8 them, and when I say "they," I don't mean all.
9 I mean some, okay. Back in 1995, growers
10 should have been planting orchards with more
11 resistant root stocks. I understand people
12 will say they're not all resistant, but there
13 is a continuum.

14 It's been well-known for many
15 years, and it's information is available in
16 extension publications, that indicate that
17 when you grow an apple tree on a highly
18 dwarfing root stock, to get a very small tree,
19 it's more susceptible. But when you grow that
20 same apple on a larger, standard root stock,
21 it's less susceptible.

22 If you look at the acreage that's

1 been planted in Washington State recently,
2 more and more of them are in highly dwarfing
3 root stocks. They're planted very close
4 together, and those are conditions that
5 exacerbate the probability of disease.

6 Can people who have not used what
7 I call proactive, preventative controls, now
8 go back and find a material to use? Perhaps
9 not.

10 CHAIRMAN STONE: All right.
11 Waldo.

12 MEMBER FOSTER: He just called me
13 Waldo. That's why I'm laughing.

14 CHAIRMAN STONE: They all heard
15 it.

16 MEMBER FOSTER: Yeah, yeah. When
17 you sent the survey out, from whom did it
18 come? If I had gotten the survey, who would
19 I have gotten it from?

20 MS. COLEMAN: We sent it out
21 actually in several different formats. We
22 sent it out as an email from Cornucopia, and

1 we also sent it out as a Doodle poll, and we
2 also sent it out on paper.

3 But it would have come from
4 Cornucopia, although the paper form had my
5 name on it, and some people who responded knew
6 me, because I knew some apple growers in
7 Washington.

8 CHAIRMAN STONE: Thanks ma'am.

9 MS. COLEMAN: Okay. Thank you all
10 very much.

11 CHAIRMAN STONE: So Natalie
12 Reitman-White is up, and Diane Dempster on
13 deck.

14 MS. REITMAN-WHITE: Hello. I'm
15 Natalie Reitman-White from Organically Grown
16 Company. Founded 30 years ago, we are the
17 largest distributor of organic produce in the
18 Northwest, wholly owned by farmers and
19 employees.

20 Today, I'm also representing the
21 Organic Produce Wholesalers Coalition, a
22 national group comprised of ten wholesale

1 distributors. Our combined annual sales in
2 2012 exceeded \$550 million. This represents
3 the majority of wholesale sales of organic
4 produce in the U.S. We sell to grocers,
5 restaurants and other customers.

6 Our members include Albert's
7 Organics, Charlie's Produce, Co-Op Partners
8 Warehouse, Earl's Organic Produce, Eastern
9 Carolina Organics, Global Organic Specialty
10 Source, Goodness Greenness, Heath and Lejeune,
11 Veritable Vegetable and OGC. Many of our
12 businesses were early participants in the
13 organic community.

14 We'd like to underscore the
15 significance of the NOSB decision on
16 tetracycline to the marketplace of organic
17 produce, and propose a workable solution in
18 the best interest of all parties. Produce is
19 a cornerstone of every grocery. In the last
20 decade, we've seen organic consumption grow
21 tremendously.

22 Of that, apples and pears are a

1 staple item. We conducted a survey of our
2 members in 2011. Collectively, the OPWC
3 purchased 40 million of organic apples and
4 pears. Of that, 66 percent of apple purchases
5 and 79 percent of pear purchases were of
6 varieties that are known to be susceptible to
7 fire blight.

8 In accordance with organic
9 principles, we support a phaseout of the use
10 of antibiotics in organic tree fruit
11 production. That said, we firmly acknowledge
12 that organic growers need field-tested,
13 commercially available methods for controlling
14 fire blight, because the disease can be so
15 devastating.

16 We are very glad to see promising
17 results coming out of research on non-
18 antibiotic control for fire blight. However,
19 we understand a few more critical years are
20 needed for a successful trade-wide transition
21 to these alternatives.

22 The OPWC is very concerned that

1 the 2014 expiration date is being rushed ahead
2 of the pace of science and on the ground
3 commercial feasibility, and will result in
4 many growing dropping their organic
5 certification, in order to protect against the
6 risk of losing entire orchards.

7 Given the market dependence on
8 fire blight susceptible varieties, this
9 outcome would be devastating to the U.S.
10 organic produce trade, taking years to rebuild
11 the domestic tree fruit market. In the last
12 six months, individual OPWC members supported
13 the work of the National Organic Coalition, to
14 craft a proposal that would take into account
15 the needs and concerns of the entire organic
16 community.

17 The centrist proposal authored by
18 Lynn Coody puts forward a workable solution
19 that addresses farmers' need for more time to
20 implement alternative practices, while
21 addressing the concerns of consumers about the
22 allowance of organic or antibiotics in organic

1 production.

2 In order to protect consumer
3 confidence in the organic brand, we believe
4 there needs to be a clear acknowledgment of
5 the health and environmental impacts of any
6 antibiotics used by the organic community,
7 together with a commitment to an absolute
8 expiration date, and short-term allowance for
9 use only when it has been documented by
10 growers that all other management practices
11 have been exhausted.

12 Therefore, the OPWC unanimously
13 supports the proposal for a short, limited use
14 extension, a concise annotation dealing with
15 the specific disease management hierarchy that
16 must be followed, an annotation dealing with
17 how oversight from certifiers and the NOP will
18 be carried out.

19 OPWC members all believe it should
20 be within a 2016 or 2017 time frame. We
21 appreciate the opportunity to comment on the
22 issue.

1 CHAIRMAN STONE: Thank you. Jay.

2 MEMBER FELDMAN: Natalie, thank
3 you. I'm going to read this too and ask if
4 you know where this came from.

5 "The Board expects members of the
6 industry to collaborate and coordinate efforts
7 in preparing for the eventual removal of this
8 material from the National List, specifically
9 optimizing the use of resistant root stocks
10 and cultivars, preventive management methods
11 and use of alternative allowed biological and
12 chemical controls whenever warranted."

13 Has that happened in the last two
14 years? I don't want to put you on the spot,
15 but do you think those kinds of activities
16 have happened in the last two years? That was
17 the 2011 annotation that we adopted when we --

18 MS. REITMAN-WHITE: I think
19 efforts have been made. I think that what I
20 understand is that the research is on the cusp
21 of being commercially ready to go, but it's
22 not there yet. We need a little more time,

1 and that time is a critical couple more years
2 to make that happen. So that's our position.

3 MEMBER FELDMAN: Yeah, thanks.

4 CHAIRMAN STONE: Harold.

5 MS. REITMAN-WHITE: And let me
6 say, with that, I also think we really need to
7 clearly acknowledge as an organic community
8 that we are concerned about the health and
9 environmental effects, and we are committed to
10 a total phaseout. I think it's important for
11 restoring consumer confidence and trust in
12 organics.

13 MEMBER AUSTIN: With your
14 stakeholder group with our proposal, how do
15 you feel that will impact your stakeholders,
16 and the interactions with your customers and
17 the consumers, if we were to move this forward
18 to 2016, versus let it expire in 2016? Do you
19 think they would be willing to accept that,
20 knowing that the tree fruit industry is trying
21 their best to move away from that? Versus the
22 alternative of its ending in 2014, and the

1 impact that that might have.

2 MS. REITMAN-WHITE: Sure. Well,
3 speaking for Organically Grown Company, I
4 think we feel it's critically important to do
5 an annotation, not that those practices aren't
6 already being followed. But we think it's
7 important to put that out there, to reassure
8 consumers and establish trust.

9 We also think we need to get
10 honest about recognizing that any antibiotic
11 use in the food system is, you know, a health
12 and environmental impact, and that we are
13 committed to doing away with it over time. We
14 think that needs to be publicly stated.

15 CHAIRMAN STONE: Thank you,
16 Natalie. Diane Dempster is up and Richard
17 Carr. Sorry for the confusion earlier,
18 Richard. Richard Carr is on deck.

19 MS. DEMPSTER: Hi. I'm here
20 representing Charlie's Produce. I am the
21 manager of Farmer's Own Organic Produce and
22 the organic specialist at Charlie's Produce.

1 I've been working there for 23 years, and I'm
2 the current president of Tilth Producers of
3 Washington. I served on the WSDA Organic
4 Advisory Board for nine years, and helped
5 write, draft some of the handling standards
6 for the State.

7 Charlie's Produce is the largest
8 independent wholesale produce company in the
9 Northwest, and one of the first wholesalers to
10 be certified organic by WSDA. We have five
11 warehouses and provide a full line of organic
12 produce to retail and food service customers
13 in Washington, Oregon, Idaho, Montana, Alaska
14 and Canada.

15 We buy locally when it is
16 available from all over the world -- buy
17 locally when it's available but from all over
18 the world when it is not. We commit to local
19 growers, and they can plant knowing that they
20 have a home for their produce.

21 Last year, we bought over 72,000
22 cases of organic apples, and 21,000 cases of

1 organic pears, which was 8-1/2 percent of our
2 total organic sales. Sales of organic produce
3 have increased 69 percent in the last ten
4 years. Our customers' sales of organics have
5 also increased.

6 Now, most of our retail and food
7 service customers buy some organic produce.
8 Sales have increased because the supply is
9 stable. If there was not a consistent supply
10 of quality, organic produce, stores would not
11 carry it and growers would not have a good
12 market.

13 Without a supply of organic pears
14 and apples, farmers would suffer and so would
15 the retail and the whole industry. We support
16 allowing the restricted use of tetracycline to
17 control fire blight in tree fruit production
18 until 2017. It was allowed as a last resort
19 in private certification standards and in the
20 first NOP rules, and it's not the time to ban
21 it now.

22 Research for products used by

1 conventional growers is done by chemical
2 companies. Research for organic treatments
3 happens slowly, as money is available. Just
4 as growing a tree takes time, so does
5 research. Researchers are close to finding
6 solutions, and we need three more years to
7 make these solutions viable.

8 Since the blight is so deadly,
9 growers would not have planted pears and
10 apples if they did not have tetracycline as a
11 backup. Growers who lose an orchard or a tree
12 to fire blight can no longer afford to grow
13 organically. This would devastate a thriving
14 industry.

15 The recent public concern about
16 the use of tetracycline is based on fear, not
17 facts. People are scared because it's an
18 antibiotic, not because they know the full
19 effect it has on their bodies or the
20 environment.

21 The Board makes decisions about
22 very complicated issues. The public and

1 growers rely on you to analyze the facts, have
2 a full understanding of all the issues, and
3 make sound decisions based on good science.
4 I trust that you will do that in this manner,
5 and allow the restricted use of antibiotics in
6 tree fruit production until 2017. Thank you.

7 CHAIRMAN STONE: Thank you.

8 Question. Jay.

9 MEMBER FELDMAN: Thank you for
10 your comments. Do you know or have you
11 surveyed the growers that you buy from, and do
12 you know what percentage of them use
13 tetracycline?

14 MS. DEMPSTER: I have not surveyed
15 them, no. We buy from -- a lot of the growers
16 that we buy from are part of packing sheds who
17 would be pooled, so I don't know many of the
18 individual growers.

19 MEMBER FELDMAN: But you don't
20 know what percentage of those growers are
21 actually using tetracycline?

22 MS. DEMPSTER: I do not. I

1 understand that it's only as needed for a very
2 limited use, from the growers that I've talked
3 to.

4 CHAIRMAN STONE: Harold.

5 MEMBER AUSTIN: Diane, thanks for
6 all of your hard work in the organic arena.
7 It's appreciated. The customers that you're
8 selling the produce that you're purchasing,
9 have you had any talks with any of them,
10 regarding the current antibiotic issue and the
11 information that's out and about, and how do
12 you answer their concerns, if you have had
13 those conversations?

14 MS. DEMPSTER: I have not had any
15 conversations with customers, but I think that
16 they would trust that what has been happening
17 with the use of tetracycline and antibiotics
18 being used only as a last resort effort, would
19 be the same as any restricted use product in
20 the organic, that's used in organic
21 production.

22 So I don't think that there's any

1 difference in this use as -- and most
2 consumers would not, they don't know enough
3 about the organic rule to understand all the
4 ins and outs of it.

5 I personally think that if I went
6 to all the retail customers that we sell to,
7 to their produce buyers, they would be very
8 interested in having a consistent supply of
9 organic apples and pears, more than how much
10 they would worry about minute amounts of
11 antibiotics used on the trees before harvest,
12 before during blossom.

13 CHAIRMAN STONE: Thank you, Diane.

14 MS. DEMPSTER: Thank you.

15 CHAIRMAN STONE: Richard Carr is
16 at the podium and Jeff Falen, Fallon is on
17 deck.

18 MR. CARR: Hello. My name is
19 Richard Carr, and I am the technical
20 specialist at Oregon Tilth. I very much
21 appreciate this opportunity to stand before
22 you today, and not by Internet, okay. Oregon

1 Tilth certifies over 2,500 acres of apples and
2 pears, mainly in the Pacific Northwest.

3 Oxytetracycline is a crucial tool
4 of last resort for organic orchards. If
5 allowed to expire without alternative fire
6 blight controls, substantial numbers of
7 orchards will reduce organic acreage in apple
8 and pear production, or surrender their
9 certification altogether.

10 Oregon Tilth encourages this Board
11 to objectively measure the potential risks and
12 likely costs that will incur if
13 oxytetracycline is not extended. The reality
14 is crops, organic or otherwise, are grown in
15 a shared world. Regardless of consumer
16 perceptions, organic does not exist outside of
17 our agricultural commons.

18 Everywhere is downstream, and
19 nowhere is this understanding more pertinent
20 than the risks associated with antibiotic
21 resistance. Tetracycline itself has been used
22 in crop production since the 1950's. It is

1 used to control fire blight in both apples and
2 in conventional orchards, or both organic and
3 conventional orchards.

4 If farmers are unable to protect
5 their trees from fire blight, they will likely
6 forego organic certification, and use
7 antibiotics outside of organic practices.
8 Removing this tool from organic farmers will
9 not diminish the cumulative use of antibiotics
10 in tree fruit.

11 Instead, the inertia we are now
12 seeing in the development of effective non-
13 antibiotic controls for fire blight will lose
14 its driving incentive. Research will
15 continue, but without the urgency and
16 creativity that necessitates innovation.

17 Antibiotics will be removed from
18 the National List. It is only a question of
19 when. Oregon Tilth urges the National Organic
20 Standards Board to consider a sunset date that
21 is based on realistic expectations, that will
22 allow research to draw significant

1 conclusions. Commercial availability must
2 also be considered in this time line.

3 Further, OTCO does not support the
4 inclusion of annotations that reiterate
5 existing standards. We encourage the NOSB to
6 avoid amending 205.206 or the National List
7 with redundant or prescriptive annotations.

8 We do know this is going to be a
9 difficult vote. It will have consequences,
10 both real and perceived. In fulfilling your
11 mandate, we urge the Board to consider which
12 choice will bring us closer to a non-
13 antibiotic solution to controlling fire
14 blight.

15 We trust that you will make the
16 very best decision possible for the long-term
17 well being of farmers, consumers and the
18 organic industry as a whole. Thank you.

19 CHAIRMAN STONE: Thank you.
20 Questions? Harold.

21 MEMBER AUSTIN: Thank you. In
22 your involvement in the organic arena and the

1 changes that we've seen take place over the
2 last, oh wow, let's say the last five, six,
3 seven years, what impact have you seen in
4 farming practices, as we've seen the acreages
5 and the number of certified operations grow,
6 and the volume of the acreage of those
7 certified operations expand?

8 What impact have you seen that
9 have of any on, those that have maybe split
10 application, you know, split production,
11 organic and conventional, and possibly on
12 their conventional neighbors?

13 MR. CARR: So could you -- so your
14 question, you're asking what is the impact of
15 the growth of the industry?

16 MEMBER AUSTIN: No, the trends,
17 the practices. You know, mating disruption is
18 an example. We farm organic, we farm
19 conventional. We use mating disruption now on
20 everything that we do.

21 MR. CARR: Right.

22 MEMBER AUSTIN: That type of an

1 impact from moving from the organic to the
2 split production type of programs, or out to
3 conventional farmers. In your day-to-day
4 operations, what have you seen is that impact?

5 I'm really looking at if we were
6 to allow the extension of the expiration date,
7 to allow the research for the organic
8 replacements and materials to continue to move
9 forward, would not that, if you've seen these,
10 wouldn't that have an impact also on the
11 conventional production?

12 MR. CARR: Yeah. No, I think very
13 much so. I think that there's a really good
14 opportunity here for organic, for solutions in
15 organics to cross the divide in the other
16 direction, to where we're taking those
17 solutions and being leaders in the entire tree
18 fruit industry.

19 So that's what I would expect, and
20 I think it's happened, cherries. There was
21 some -- David Granatstein had spoke to that
22 just the other day. So but I think that's a

1 real possibility.

2 CHAIRMAN STONE: Thank you,
3 Richard. We're moving down. Bill Denevan.
4 You're up at the podium, and David Granatstein
5 on deck.

6 MR. DENEVAN: Hello. My name's
7 Bill Denevan, and let me tell you a little bit
8 about myself. I'm a member of the Board of
9 Directors of the California Apple Commission.
10 From 1996 to 2006, I grew organic Bartletts
11 and apples on 120 organic acres in the Santa
12 Cruz-Watsonville area of California.

13 The companies that I had were
14 Denevan Apple and Happy Valley Farm. I have
15 35 years of experience working with growers,
16 assessing their crops and giving advice in the
17 U.S. and Chile. I've worked for almost 20
18 years as a grower rep with CF Fresh and
19 VivaTerra.

20 My job has brought me in contact
21 with just about every region in the West where
22 fire blight is a problem. As an organic

1 grower, I know quite a bit about blight. What
2 I did was manage the vigor, follow the
3 temperatures and moisture models, spray
4 copper, cut infections, burn infected wood and
5 pray.

6 I've fought it year after year. A
7 few times, I had to cut out nearly every
8 fruiting branch, leaving only five or six span
9 liters. It took years to get production back
10 up to that time. Every year, I had to do some
11 amount of blight cutting and burning just to
12 save the trees. My apples are much easier to
13 handle.

14 During my travels, I've seen
15 nearly 1,000 acres of organic and conventional
16 apples and pears bulldozed due to blight
17 attacks.

18 In many cases, the affected
19 growers went bankrupt. Eight years ago in
20 Tonaske I saw an orchard of 150 acres of
21 Bartlett, Conference, Comice and Anjou
22 completely wiped out, because the grower

1 wanted to forego the needed antibiotic
2 treatment so he could sell his fruit to
3 Europe.

4 Ten years ago in Cuyama Valley, I
5 watched bulldozers take out 400 acres of
6 beautiful five year old pink, Pink Ladies, due
7 to a perfect storm of bad weather and
8 ineffective blight program. A couple of years
9 earlier than that at Pioneer Ranch, I watched
10 20 acres of 12 year-old Bosc get pushed out.

11 Five years ago, my 2,000 Bartlett
12 trees were abandoned. Today, they're in
13 piles, being burned as we speak. They did not
14 die directly from blight, but the treatment
15 plans I needed to do effective blight control
16 were just too expensive to keep the orchard
17 going.

18 Almost all the apple and pear
19 growers that I deal with -- almost all apple
20 and pear growers can do pretty well with heat,
21 bug, fungus, floods and market swings. But
22 dealing with blight infections is a special

1 problem.

2 We all know that in a bad blight
3 year, you can easily destroy your life's
4 investment, and you have to find a new way to
5 provide for your family. I've been following
6 the recent research into organic blight
7 control pretty close. It looks promising for
8 the future, but the devil's in the details.

9 Right now, we're in bloom in
10 California. Growers Advisors, the California
11 Apple Commission, the Pear Advisory Board and
12 manufacturers of control products are
13 conducting trials. We need to see how
14 effective these new materials will perform in
15 our local microclimates before adopting new
16 practices.

17 What regimen might be effective in
18 Washington and Oregon might not work out so
19 well in California. We have less chill hours,
20 a more uneven bloom period, always more
21 moisture, and oftentimes more heat issues to
22 deal with.

1 Getting new materials and
2 protocols figured out is going to take more
3 time. Approving material with California
4 Department of Pest Regulation takes much
5 longer than other states. There is no doubt
6 growers in my state will need more than four
7 years to get a product tested, approved and
8 manufactured in sufficient quantity to supply
9 growers' needs.

10 Most, if not all, of organic
11 growers believe in treading lightly on the
12 planet, and improving the environment they
13 live in. But they are also rational business
14 people who have to feed their families.

15 It's not the growers' fault that
16 they have not gotten a new tool to fight their
17 blight. Growers don't make the new materials.
18 Manufacturers, researchers and regulators do
19 this work. Growers have been working in good
20 faith with these people.

21 Please give all of us a realistic
22 chance to succeed. We need four more years,

1 not two. Anyway, any questions?

2 CHAIRMAN STONE: Thank you, Bill.
3 Question, John?

4 MEMBER FOSTER: So Bill, in full
5 disclosure, Bill taught me most of what I know
6 about apple production in the Santa Cruz area
7 a long, long time ago. It's really good to
8 see you. My question is how -- so when you
9 say we need four more years, not two, tell me
10 more about it?

11 MR. DENEVAN: Well, right now --

12 MEMBER FOSTER: Like in what ways
13 would four be adequate but two's not?

14 MR. DENEVAN: Well, right now we
15 have -- I have a couple of growers. We're in
16 bloom right now, and they're using the Blossom
17 Protect, and it seems like a pretty good job.
18 But after bloom, we're concerned about having
19 to use copper.

20 Now in the Northwest, they have a
21 lot less -- it's a desert, and they have a lot
22 less rain. But we worry about russet, and we

1 can really destroy the fruit by putting russet
2 on it. Nobody will buy it, and being in a
3 coastal area where I am, we really can have a
4 lot of russet problems, especially on pears.

5 Now apples, I'm a little -- I
6 think it's a little bit less problematic. But
7 pears, there's no way that I could see that
8 we've developed a protocol that's going to
9 work.

10 We need more time to see what's --
11 I think there's about, oh about maybe a 1,000
12 acres in California that are being checked
13 with Blossom Protect at the most. But there's
14 a lot more than that that have apples and pear
15 growers, and especially pear growers. They
16 need to check it out.

17 So anyway, that's -- I think we
18 just need more studies and more results.

19 CHAIRMAN STONE: Thank you, Bill.
20 Thank you for taking the time to be here.
21 David Granatstein is at the podium, and John -
22 - I'm sorry, Carmela. Bill. Okay yeah, go

1 ahead.

2 MEMBER BECK: Hello? Bill.
3 Sorry. So I think you kind of touched on
4 this, but I might have missed it. But could
5 you give some more examples about the
6 conditions in California that affect the fire
7 blight, and the need for control?

8 MR. DENEVAN: Well, one thing that
9 I stated in my talk was that we have, we don't
10 have the adequate winter chill a lot of times.
11 So we'll have a bloom that's scattered. So
12 the bloom period goes on for a longer period
13 of time.

14 It's harder to get the model right
15 when you're under attack, because when the
16 bloom is out there, that's when the blight is
17 coming into the flowers. So if you have a
18 flowering period longer, you have a lot more
19 chance of getting blight.

20 And then we also have more
21 moisture, you know. We're not a desert in
22 California. Even our driest areas have more

1 moisture than the desert areas of the
2 Northwest. So this contributes to more of a
3 bad blight situation.

4 So we have, I can think of at
5 least five or six definitive climate
6 situations that need different treatment. So
7 you know, we don't have experiments going on
8 in those areas. We need to have all of the
9 areas covered, and we need to have more
10 product available for experimenting with.

11 We don't have this copper that we
12 hear about, that doesn't russet. I mean we've
13 seen nothing but russet from copper. So we
14 want to try that and see if it works, you
15 know, after we do the Blossom Protect. This
16 is what people are saying we need to use.

17 So you know, I've seen it in both
18 apples and pears this year already. We're
19 cutting it out and it's quite a problem right
20 now, as we speak.

21 CHAIRMAN STONE: Thank you, Bill.
22 David Granatstein to the podium, and John Hyer

1 on deck.

2 DR. GRANATSTEIN: Okay. You
3 should get my presentation here in a moment.
4 My name is David Granatstein. I'm with
5 Washington State University in Wenatchee,
6 Washington. I'm the co-chair of the Organic
7 Tree Fruit Work Group that was requested by
8 the Board at the April 2011 meeting in
9 Seattle.

10 My comments represent my views as
11 someone who works extensively with organic
12 orchardists here in the Pacific Northwest, but
13 those views do not necessarily represent all
14 Work Group members. I want to make that
15 clear.

16 As shown in this time table --
17 which is the next slide, please -- research
18 into the fire blight disease and biological
19 controls has been occurring for many, many
20 years. The industry and growers have been
21 exploring these alternatives, but there's
22 really been a lack of success until recently.

1 So it's not a lack of effort; it's
2 been a lack of success. And that's what we
3 are just on the edge of, I believe,
4 particularly with the OREI project and many
5 other things we heard about earlier today.

6 Next slide, please. I fully
7 understand the concern about the risk of
8 antibiotic resistance in human pathogens from
9 agricultural use of antibiotics. However, all
10 uses and materials do not appear to be the
11 same.

12 In this slide, Dr. Jeff Ullman,
13 University of Florida, has recently published
14 some research looking at the environmental
15 fate of pharmaceuticals, and he shows in this
16 graph that tetracycline, which is in the lower
17 right corner, becomes absorbed to the soil
18 within about 24 hours, where it is no longer
19 biologically active.

20 The paper states, and I quote,
21 "Thus, residual antibiotics in soil do not
22 necessarily exert a selective pressure, and

1 the degree to which the pharmaceutical remains
2 bioactive depends on the antibiotic. Efforts
3 to control antibiotic contamination would be
4 better directed towards compounds that retain
5 biological activity in soils," and
6 tetracycline is not one of them.

7 Next slide, please. Statements
8 that all organic apples and pears have
9 residues of oxytetracycline and streptomycin
10 are simply not true, since only on average ten
11 percent of U.S. apple acres are treated each
12 year with this material, and few acres are
13 treated with both materials. So that's just
14 not correct.

15 Data on measurable residue levels
16 of oxytetracycline on fruit are scarce. We've
17 heard about the EPA data. Those results had
18 residues less than the limit of quantification
19 on most of the fruit.

20 But remember, in that study, no
21 one's mentioned this yet, these materials were
22 applied between 49 and 61 days pre-harvest.

1 The set pre-harvest interval is 60 days. So
2 they were pushing the limit. They were
3 applied at rates of .5 half label rate to 11
4 times label rate. So that study is not
5 representative of what's going on out there in
6 the world.

7 Next slide, please. So to try to
8 help with this, I coordinated a round of
9 residue testing last fall, to see whether
10 trees treated during bloom, which is the most
11 common scenario in this region, whether those
12 fruit would be free of residues at harvest,
13 due to the absence of fruit at treatment,
14 we're treating blossoms, the degradation of
15 oxytetracycline during the five month growing
16 season, we've heard about that, and the lack
17 of mobility of oxytetracycline into the plant
18 where it might move around and come back into
19 the fruit.

20 Using the biggest current
21 analytical method, the laboratory found no
22 detectable residues on any of the samples --

1 I think you need to hit -- yeah, there we go.
2 Thank you.

3 On any of the samples from seven
4 different orchards in Washington State, that
5 were treated from one to five times during
6 bloom. And actually one orchard was treated
7 during mid-summer because there was a major
8 hailstorm that incited fire blight.

9 So zero residues. That's a real
10 small set of data points, but it's something
11 I think we can start to understand, what is
12 really going on out there with this type of
13 use.

14 Next, please. In this chart, I
15 have outlined the key elements of fire blight
16 control and their status at different decision
17 points the Board has taken.

18 For me, it's hard to see that
19 suitable alternatives were available when the
20 2008 and 2011 decisions were made, and how
21 expiration dates were chosen. Thank you.

22 CHAIRMAN STONE: Thank you, David.

1 Questions? Nick. You're still up.

2 MEMBER MARAVELL: Dr. Granatstein,
3 it's a pleasure to have you at the podium
4 again.

5 DR. GRANATSTEIN: Thank you.

6 MEMBER MARAVELL: You were at our
7 Seattle meeting. When we recommended an
8 extension to 2014, did you give us any
9 indication that that was sufficient time for
10 the research to, at that point, get funded,
11 let alone get conducted?

12 Was there any expectation that you
13 gave us that there would be adequate research
14 to provide alternative materials within that
15 time line?

16 DR. GRANATSTEIN: No. That is why
17 the petition was refiled immediately, because
18 we felt that the 2014 date was not related to
19 progress in the research and the availability
20 of information to the growers.

21 We were told by the NOP that the
22 only recourse or question that decision was a

1 new petition. That's the only reason we are
2 where we are today.

3 MEMBER MARAVELL: Was it your
4 understanding that we on the Board were
5 looking for positive movement on the part of
6 the industry and the research community, and
7 that we were going to use our best auspices to
8 encourage funding for your efforts, and that
9 was the reason for the 2014 extension?

10 DR. GRANATSTEIN: Well, my
11 understanding is it was a political compromise
12 date. That's what I understood from that
13 meeting.

14 MEMBER MARAVELL: Okay.

15 DR. GRANATSTEIN: But that you
16 were expecting the Tree Fruit Work Group to be
17 formed, to keep you informed of what was
18 happening in the industry. But without a
19 petition, I was told that there would be no
20 action to reexamine the date, and that's why
21 the petition came forward.

22 MEMBER MARAVELL: Can you tell us,

1 in your opinion, what would happen in 2015 and
2 2016 in a little bit of detail, if we were to
3 extend this date, and why that would be
4 important from your perspective?

5 DR. GRANATSTEIN: Well, I consider
6 the OREI research project on organic fire
7 blight control to be pretty central. It's
8 really the first project of its kind that's
9 specifically looking at non-antibiotic control
10 in organic systems. That's a landmark study.

11 It won't be completed until 2015.
12 It will take some time for them to analyze,
13 write up the data. They'll typically want to
14 publish journal articles first out of that
15 sort of work, and then extension materials
16 normally flow from that. That's the very
17 typical sequence.

18 If you publish extension materials
19 first, the journals often will not publish
20 your results. So the key in many ways is
21 getting this into vetted, acceptable extension
22 educational formats for the growers to use,

1 and it does take additional time, once the
2 research is completed, to do that.

3 MEMBER MARAVELL: Is the Previsto
4 product part of your research experiments?

5 DR. GRANATSTEIN: It is not part
6 of mine, because I'm not doing the research.
7 But it is part of the folks on the ground
8 doing it, yes. Yes, they've already been
9 testing it, but it is not registered. That's
10 obviously -- it can't be used by the growers.

11 CHAIRMAN STONE: Tracy.

12 MEMBER FAVRE: Hi, thanks for your
13 information. Can you elaborate a little bit
14 about the difference in application between
15 the research that was cited in the EPA report
16 and the research difference between what you
17 just did with the residue testing?

18 DR. GRANATSTEIN: The testing I
19 did represents fruit that were treated at
20 bloom, except for the one orchard, where I
21 said there was a mid-summer application.

22 So it was at blossom time, which

1 is the typical application, and then at
2 harvest we got the fruit samples, put them,
3 plastic bags, chain of custody to the lab, and
4 they were tested later in the fall, after
5 harvest.

6 The EPA study was done at a number
7 of locations around the country. As I say,
8 they had a range of rates, because they were
9 trying to establish a label rate at that time.
10 So they went from half label to about 11 times
11 label rates. So very, very high application
12 rates, and they were putting those
13 applications on between 49 and 61 days before
14 harvest.

15 So when the growers are spraying
16 at bloom, it may be something like 150 days
17 before harvest. So quite a big difference in
18 time frame. And at the time it was applied in
19 the EPA study, you had fruit on the tree. So
20 you had a fruit surface on which the residue
21 would land and potentially persist.

22 At bloom, theoretically, and

1 that's what I was curious about, there's no
2 fruit. There's a blossom that falls off the
3 tree. There should be -- and if there's no
4 translocation in the plant, there should be no
5 residue left on a fruit that begins to develop
6 at that point.

7 MEMBER FAVRE: Just as a follow-up
8 point of clarity or clarification. So the EPA
9 study, they applied up to 11 times, which from
10 everything we've heard --

11 DR. GRANATSTEIN: Eleven times the
12 rate. I don't know if it was 11 applications
13 or just the total amount. It was 11 times
14 what was being proposed as the label rate.

15 MEMBER FAVRE: But typically much
16 closer to harvest time --

17 DR. GRANATSTEIN: And closer than
18 the legal limit even. They went past the
19 normal pre-harvest interval, just to kind of
20 push the system and see what would happen.

21 MEMBER FAVRE: Okay, and so was
22 there any direct correlation between the

1 application rates and the incidence or the
2 percentage of residue?

3 DR. GRANATSTEIN: No, there was no
4 dose-dependent effect, which you would have
5 expected with that spread of application
6 rates. But the data were just very scattered
7 and not very many positive detects.

8 MEMBER FAVRE: So we didn't see
9 the percent residue increase with the percent
10 application?

11 DR. GRANATSTEIN: That's correct.

12 MEMBER FAVRE: So there was no
13 direct correlation between them?

14 DR. GRANATSTEIN: Right.

15 MEMBER FAVRE: Okay, thank you.

16 CHAIRMAN STONE: Jay.

17 MEMBER FELDMAN: Are you familiar
18 with the way EPA sets tolerances? Have you
19 reviewed tolerance review documents?

20 DR. GRANATSTEIN: No.

21 MEMBER FELDMAN: Okay. Do you
22 think --

1 DR. GRANATSTEIN: That's outside
2 of my expertise.

3 MEMBER FELDMAN: Do you think a
4 registrant of a pesticide or an antibiotic
5 would seek a tolerance level from the EPA, if
6 they could use their product and generate a
7 zero tolerance or zero residue, and then seek
8 to market it?

9 These are tests that are done,
10 field studies that are done. You keep
11 referring to it as an EPA study. These are
12 field studies that are done by the
13 manufacturer.

14 DR. GRANATSTEIN: Correct.

15 MEMBER FELDMAN: They're submitted
16 to EPA. Believe me, those manufacturers are
17 trying to show a zero tolerance or zero
18 residue so they can market their product with
19 an exemption from tolerance.

20 The reason they can't get a zero
21 tolerance is because there are residues that
22 are showing up in the finished food product,

1 and if they were to take a zero tolerance and
2 not the tolerance above limits of detection
3 that they have -- even though they are
4 variable; no one's questioning that they're
5 not variable.

6 If they were not to take that
7 residue tolerance, the one you're criticizing,
8 their products would be violative. They would
9 be in violation of the law, and they would be
10 pulled off the shelves. So instead of doing
11 that, because of the variability in tolerance
12 that exists, it's not a flat line, you always
13 see variability.

14 Because of that variability, they
15 take the tolerance and ensure that when
16 growers use their products, that they will not
17 be pulled off the shelf. So you can always
18 show with any pesticide, even in conventional
19 crop production, that you go from below levels
20 of detection up to above levels of detection,
21 and you've got to go with the level that is
22 possible.

1 Maybe infrequent, maybe frequent.
2 We don't know. But it's there, and it's
3 found, and you know, this is not a study.
4 This is a tolerance-setting protocol that is
5 used by EPA.

6 DR. GRANATSTEIN: Okay. Well, my
7 goal is to say what happens when you do use a
8 normal use pattern? Do we find residues on
9 the fruit, because that appears to be a lot of
10 the questions we've had over the last two
11 days.

12 MEMBER FELDMAN: But you're not
13 familiar with the tolerance-setting process,
14 so you didn't use the EPA protocol that's used
15 for all pesticide use in the U.S. So I
16 appreciate the work you're doing. I think it
17 might be something you should bring to EPA
18 perhaps at some point.

19 But for purposes of our relying on
20 scientific data that is useable for purposes
21 of finding the normalized rate of residuals
22 that are found, we can't go off of one study

1 like this, unfortunately. But I appreciate
2 your work.

3 DR. GRANATSTEIN: Well, then
4 that's all it is. It's a single probing at
5 this issue, because no one else has delivered
6 anything, other than the EPA report, which
7 contains data from other studies.

8 MEMBER FELDMAN: Right, and that's
9 all we got. Sorry, thanks.

10 CHAIRMAN STONE: Jean.

11 MEMBER RICHARDSON: David, on a
12 slightly different tack, from your experience,
13 you know, the Canadians can't use antibiotics
14 in their organic pear and apple production.
15 What are the materials that they're using
16 right now, do you know? And how effective are
17 they?

18 DR. GRANATSTEIN: I don't know
19 that. I'm not familiar with the Canadian
20 situation for fire blight.

21 CHAIRMAN STONE: Harold, I'll let
22 you wrap this up.

1 MEMBER AUSTIN: David, thanks for
2 your presentation. I think this is probably
3 where we'll agree to disagree a little bit
4 amongst ourselves on the Board. I think the
5 study and the time and energy that you put
6 forth to go out and get those samples and test
7 for those residues really does have benefit,
8 because it does show, under normal testing
9 protocol, that there was zero detect on the
10 seven samples that you turned to the lab,
11 ranging from one application to five
12 applications.

13 My question to you is the one
14 sample that you talked about that was made to
15 fruit that had been hailed on, typically,
16 could you describe to the Board typically what
17 a hailed on piece of fruit would look like,
18 and wouldn't that have a tendency to show a
19 higher percentage of residue possibly because
20 of the imperfections that are created by the
21 hail?

22 DR. GRANATSTEIN: Hm. Well,

1 hailed fruit is, depending on the severity of
2 the storm and where it sits on the trees, is
3 just pockmarked from the hailstones, depending
4 on the age of the fruit when the storm occurs.
5 Sometimes the hail creates wounds that break
6 the skin, and sometimes it doesn't.

7 MEMBER AUSTIN: Yeah. That's one
8 of -- I guess I should have asked that
9 question before I made that statement. Did
10 the hailed on fruit that you had, were there
11 any perforations in the skin of the fruit
12 itself?

13 DR. GRANATSTEIN: I don't believe
14 so. No. I don't remember it being as really
15 horrible looking hail fruit that they brought
16 me. So they probably tried to get some of
17 the better fruit from that orchard as a
18 sample, yeah. Okay. Thank you very much.

19 CHAIRMAN STONE: Thank you for
20 your work and being here today. John Hyer to
21 the podium, and Patty Lovera on deck.

22 MR. HYER: Thank you for allowing

1 me this time to comment. I am an organic
2 farmer, being farming organically for 16
3 years. In addition, I sit on the Washington
4 State Organic Advisory Board.

5 I am in favor of extending the use
6 of tetracycline to the 2016 date. I have
7 absolutely no interest in orchards, apples,
8 pears. I am a vegetable farmer, vegetable and
9 small grains, and I want to talk to some of
10 the issues that were brought up to shorten the
11 date.

12 One was this variety. You can
13 switch variety at will. My specialty is
14 potatoes. I've grown six different varieties
15 in ten years. Last year, my major buyer came
16 to me and said if you grow that variety again,
17 we will not purchase from you. So when you
18 say it's easy to switch variety, it's not easy
19 to switch variety, especially for an
20 orchardist. The market wants what the market
21 wants, and we need to find a way to produce
22 that acceptably.

1 Root stock. I was going to bring
2 a friend with me today, but he had to work.
3 He's a tree salesman for one of the largest
4 nurseries in the Pacific Northwest selling
5 trees. And I asked him about this resistant
6 root stock. He says if you want resistant
7 root stock and you ordered it today, I might
8 get it to you by 2017. So, yeah, they're
9 working on these things, but the time frame is
10 not where we need it to be yet.

11 There's also some discussion that
12 it's only the large growers who are concerned
13 about this. All the diseases and pests I've
14 ever fought have been indiscriminate. They
15 don't care if you're small, medium or large.
16 They're a problem for everybody. So those who
17 have this problem with fire blight, it's
18 everywhere, and everybody's affected by it.

19 Other people who have testified
20 have talked about the fact that we don't exist
21 in a bubble with organic production. We
22 produce organically right next to our

1 conventionally producing neighbors. We have
2 to get along with those people.

3 I think if you don't control fire
4 blight in your organic orchard, your
5 conventional neighbors will strive to put you
6 out to business, because it's a really serious
7 problem in the orcharding industry, and you
8 can't have a source of innoculant sitting
9 there to spread into the rest of the fruit
10 production that's out there. That's all I
11 have for you. Thank you.

12 CHAIRMAN STONE: Thanks for being
13 here. Questions? Jay.

14 MEMBER FELDMAN: Thanks for being
15 here. If you knew that, even though you're
16 not in fruit production, that the use of an
17 input would affect public trust in the overall
18 organic market, that is, people would start
19 questioning, you know, their faith and trust
20 in the organic market, and that would have
21 rollover effect or secondary effects to other
22 markets that are not the fruit, apple and pear

1 production.

2 I mean, we obviously don't have a
3 crystal ball on this, but how would that
4 affect your thinking at this point?

5 MR. HYER: I believe what you're
6 asking is what is the public's perception of
7 organic. That's anybody's guess. It means
8 something different to every single consumer
9 out there.

10 MEMBER FELDMAN: Thank you.

11 CHAIRMAN STONE: Thank you. Thank
12 you for being here. Oh, I'm sorry. Sorry,
13 Tracy.

14 MEMBER FAVRE: Sorry. One last
15 question.

16 MR. HYER: Sure.

17 MEMBER FAVRE: Since you're not a
18 fruit producer and you're obviously busy as a
19 farmer, what motivated you to come here today,
20 to take the time to make this testimony?

21 MR. HYER: Some of the diseases we
22 face in vegetable production behave very

1 similar to fire blight. The particular one we
2 deal with is called late blight. It's a big
3 issue in potatoes. People talk as though
4 these things are easy to deal with, easy to
5 control. They talk as though, well, you just
6 do this, this, and this and you won't have a
7 problem. That's not the case.

8 When weather patterns, winds,
9 disease pressures get just right, there really
10 does seem to be almost nothing you can do,
11 regardless of all the steps you have taken to
12 prevent something like that from happening.

13 CHAIRMAN STONE: Great. Thank you
14 very much. Patty Lovera, and Kenneth Mandley
15 on deck.

16 MS. LOVERA: Okay. Hi everybody.
17 My name is Patty Lovera, and I work for Food
18 and Water Watch, which is a national consumer
19 advocacy group.

20 So our supporters are extremely
21 interested in the organic standards because
22 they use them. They use this label for lots

1 of purposes, in which foods they choose and
2 they're very, very, very motivated to make
3 sure that the standards are -- ensuring that
4 the label is telling them what they're looking
5 for and what they think it does.

6 So very quickly I'm going to talk
7 about aquaculture, and then I'm going to shift
8 to tetracycline.

9 So we agree with what Center for
10 Food Safety, George Kimbrell presented this
11 morning, and I'm not going to reiterate that.
12 I did bring a memo that we had given to the
13 NOP a few months ago, to try to inject some
14 more information into what you're using, since
15 the recommendation came out in 2008. So I
16 will drop that off.

17 It does have some new data since
18 2008 about escapes from open net pen systems,
19 especially salmon systems, which is every year
20 we can reliably add to that data, because the
21 escapes keep happening. It is a fact of life
22 in those systems, and that's an environmental

1 issue.

2 There's also some information in
3 there about using fish meal and fish oil as
4 feed, and just the last thing I'll say about
5 that is as you're looking at these materials,
6 I know that's the job has before it, we think
7 you do have to think about those materials in
8 both systems, since we don't yet have a
9 standard of what organic aquaculture's going
10 to be. We need to look it in an open system
11 and a closed system. There's a much different
12 environmental scenario about how you use
13 materials.

14 So to shift to tetracycline, in
15 the interest of time, Food and Water Watch
16 supports the minority position, and we oppose
17 any extension on the expiration date for
18 oxytetracycline for apple and pear production.
19 I think the issue of consumer expectation has
20 been covered well here, but it's where we come
21 from as a consumer advocacy group, and I do
22 want to just point out a couple of things.

1 I know that you heard yesterday
2 about the polling that Consumers Union did,
3 and that's been affirmed in our experience, in
4 our conversations with the folks who talk to
5 us, who come to us to do, learn more and take
6 action and things like that.

7 What we're finding out is that
8 they don't know that these materials are used,
9 and when they find out, they're not happy. I
10 think the point made earlier about what do
11 consumers know and whose responsibility is it
12 to tell them, I think it's an interesting
13 conversation and, you know, consumer groups
14 are having this conversation.

15 You've seen that we're talking to
16 our members. We're doing action alerts. The
17 word will be getting out there, and as we talk
18 about organic, it's a lot more complicated now
19 if we're going to talk about antibiotics, and
20 there's not a very, very firm plan to get
21 antibiotics out of organic.

22 The other thing I do need to say

1 though is that as I am reminded regularly, in
2 Washington, D.C., especially, this is a
3 marketing program. I'm reminded of that all
4 the time when I talk about organic. So
5 marketing plays a role too.

6 So I think that we have to talk
7 about what marketing messages consumers are
8 getting about this label and about the use of
9 antibiotics.

10 So on Friday, we looked very, very
11 quickly on the Internet and found -- very
12 quickly on the Internet and found examples
13 from national food companies, one of whom is
14 represented on this Board. Sorry, Earthbound.

15 We found examples where folks are
16 not making a distinction between livestock and
17 other foods. They're saying organic does not
18 use antibiotics. That's what consumers are
19 learning. So it's time for organic to live up
20 to that expectation.

21 So last, quickly, I will just say
22 on the residue issue, it's an important

1 conversation. As a consumer, I'm obviously
2 motivated by thinking about what I'm taking
3 in. But we spend an enormous amount of time
4 outside organic talking about antibiotic
5 resistance issues, and we've been educated
6 about the reservoir of resistance in the
7 environment being the threat that keeps public
8 health officials awake at night.

9 So I think we really have to focus
10 on what we heard from Dr. Morris. There's
11 like some comments in the docket from places
12 like Johns Hopkins University that are talking
13 about any use of these materials start to take
14 away their effectiveness.

15 They build to that reservoir of
16 resistance in the environment, and organic
17 needs to be ahead of that curve, not begging
18 for more time.

19 CHAIRMAN STONE: Great, thank you.
20 Zea.

21 MEMBER SONNABEND: Thank you.
22 Would adopting an annotation such as was

1 proposed by Lynn and the centrist position
2 make you feel better or make you change your
3 message to your constituents in any way?

4 MS. LOVERA: I think, at this
5 point, what consumers need to hear is
6 something that's going to be hard to prove
7 without a time machine, is that it's going to
8 happen. We've had this experience with other
9 materials and other kind of controversies in
10 organic.

11 So I think we have to tell them
12 it's absolutely going to happen. There isn't
13 going to be any slippage. This is how. And
14 we're going to have to reserve judgment until
15 we hit that date, whatever the date is, and we
16 see if this material's still being used.

17 That's the honest answer of where
18 we can come from. I think the strongest
19 signal the Board can send is to not extend the
20 date.

21 CHAIRMAN STONE: Colehour.

22 MEMBER BONDERA: Thank you. Thank

1 you, Patty. I want very briefly for you to
2 address for me, at least -- and I know we're
3 switching topics; we're focused on this
4 tetracycline. But I would like from the Food
5 and Water Watch's perspective what you were
6 referring to.

7 If you could just given what you
8 said, and you said, you know, you've passed
9 some of that around and what-not, what would
10 you -- I hesitate, because I'm not sure what
11 to say -- advise or suggest or encourage us as
12 the NOSB to do, given the information that
13 you're referring to and have provided, in
14 terms of, so, what's our next step, in your
15 opinion?

16 MS. LOVERA: On aquaculture?

17 MEMBER BONDERA: On aquaculture.
18 Yes. Sorry, sorry, I apologize. Yes. I
19 apologize.

20 MS. LOVERA: Okay. Right. So, I
21 mean, this is a tough procedural spot that the
22 Board is in, and we appreciate that. So you

1 have a recommendation that none of you were
2 around to make. It has not yet been made a
3 standard, and you're supposed to evaluate
4 materials for systems that you don't know what
5 they look like yet.

6 So, we get that. I don't envy the
7 position of the Board in having to navigate
8 that. So I think that's probably an agenda
9 question from the Program that we have an
10 opinion on, about whether you all should be
11 looking at materials yet, if we don't know
12 what these systems look like.

13 We would say no. And then I think
14 if it stays on your agenda and you're still
15 having these conversations, I think you sadly
16 have to do the extra work of thinking about
17 different scenarios of how materials are being
18 used, and you're not -- so that you're
19 thinking about all the possibilities before
20 you approve the material, because there's a
21 huge variation of what aquaculture can be. We
22 heard about that this morning.

1 So I think it actually adds to
2 your work, if you're doing those materials
3 before we know what the systems are going to
4 look like.

5 CHAIRMAN STONE: Jay.

6 MEMBER FELDMAN: Thanks, Patty.
7 Can you explain to the Board what Food and
8 Water Watch's stake is in the growth and
9 success of organic production?

10 MS. LOVERA: I mean, so, Food and
11 Water Watch talks to consumers most of the
12 time about what we don't like about, whether
13 you want to call it industrial agriculture and
14 conventional agriculture, and people logically
15 want to know then what am I supposed to do
16 tomorrow while these bigger challenges are
17 being tackled.

18 We would like to be able to
19 continue to say that organic presents an
20 option, and you know this, this and this
21 aren't happening, and this, this and this are
22 happening.

1 So that's what we say, and we tell
2 people that, and we also try to put out
3 information that lets people know what
4 expectations they can have of organic that are
5 rational.

6 The more asterisks, the more
7 "excepts" we have to put on there, but they
8 don't use antibiotics "except" in this, or
9 they don't, you know, feed animals feed that
10 isn't 100 percent organic, "except" in
11 aquaculture, the harder it is for us to say
12 that that's an easy, you know, daily thing
13 that you can do to kind of avoid the ills
14 we're talking about in the mainstream system.
15 So we want this to be the strongest program it
16 can be so we can credibly recommend it to
17 people.

18 CHAIRMAN STONE: Harold, if you'll
19 finish this up.

20 MEMBER AUSTIN: Hi, Patty. Hey,
21 quick question. You made a comment about all
22 of the things that you're involved with.

1 Question regarding the consumer survey, the
2 petition with the signatures and stuff. Do
3 you represent -- were those signatures, were
4 those strictly from organic consumers, or were
5 those from all consumers?

6 MS. LOVERA: Those are from people
7 who are on our email list. It was a very
8 small sample of our email list actually,
9 because it's been kind of a busy month when we
10 had to get those. So we sent that to about,
11 I think we sent it to about 40,000 people, and
12 about 7,000 responded, which is actually very,
13 very high.

14 These are people who identify with
15 Food and Water Watch. We ask them
16 periodically how they identify themselves.
17 They are very interested in organic. I don't
18 think that they would say they are only
19 organic consumers. They're kind of all over
20 the range of interested --

21 MEMBER AUSTIN: Okay, so, I mean,
22 and that's what I'm trying to clarify. Are

1 they truly, were they truly organic
2 stakeholders, or were they from the masses?

3 MS. LOVERA: I think there's some
4 of both.

5 MEMBER AUSTIN: Because that does
6 have an impact.

7 MS. LOVERA: I mean, so we ask
8 people about their demographics and what they
9 do about once a year, and there is a range.
10 I don't know if anybody's 100 percent organic
11 all the time, and we don't ask them that. But
12 they respond to organic issues. They're very
13 invested.

14 CHAIRMAN STONE: Thank you, Patty.
15 I have Kenneth Mandley to the podium and Neal
16 Manley on deck.

17 MR. MANDLEY: How did that happen?
18 Good afternoon. My name is Ken Mandley. I
19 operate a small certified organic apple
20 orchard in northwest Wisconsin. But I'm here
21 today on behalf of the Organic Tree Fruit
22 Association, a group of organic tree fruit

1 growers centered in the upper Midwest. To our
2 knowledge, the only formal organization of
3 organic orchardists east of the Rocky
4 Mountains.

5 As growers, we've watched the
6 continuing debate concerning use of
7 antibiotics with concern. As is true of the
8 larger organic community, our members have a
9 wide range of opinions, practices and
10 philosophies regarding such use.

11 However, after much internal
12 debate, we developed a middle course between
13 outright ban and unrestricted use. Today, I
14 want to quickly address some common
15 misperceptions, and then offer our middle
16 ground proposal.

17 First, contrary to some
18 suggestions I've read, and this is important,
19 organic fruit growers, at least those in our
20 organization, are not trying to cheat, subvert
21 or water down organic standards. Our members
22 are generally small growers with an average

1 commercial orchard size of less than ten
2 acres, the largest about 200 acres.

3 We are committed to providing
4 healthy fruit for consumers while being good
5 stewards of land and water. In fact, our
6 commitment to organic agriculture is so
7 strong, we put our money where our mouth is
8 every year, as we face the risk of financial
9 failure, while working to provide a crop of
10 saleable fruit.

11 The second misperception concerns
12 the practicality of replacing our orchards
13 with fire blight-resistant trees. This is not
14 economically viable in the short or medium
15 term. Commercial availability of the Geneva
16 series is limited. There are some cultivars
17 that are more blight-tolerant than others.
18 There are blight immune cultivars.

19 The third misperception involves
20 the fear of antibiotic use will lead to
21 resistant bacteria infecting humans, and David
22 addressed that better than I can. In my

1 written comments from our organization, we
2 reference some other scientific studies I want
3 to call your attention to.

4 The final misperception is that
5 there are viable alternatives to antibiotics
6 currently available. The truth is new
7 products developed for use in Washington State
8 may or may not work around the rest of the
9 country. In fact, early research conducted at
10 Michigan State University indicates that
11 Blossom Protect does not work at all in
12 Michigan growing conditions.

13 Further, such products do not
14 address the catastrophic potential of a post-
15 blossom infection brought on by the
16 combination of hail, high humidity and high
17 temps, a very real potential in the upper
18 Midwest.

19 The truth is many apple and pear
20 growers rely on antibiotics at certain times
21 because there are no other options. The
22 suggestion that this is somehow the fault of

1 growers is misguided, at best.

2 Growers turn to antibiotics
3 because they cannot afford to put their
4 orchards at risk of total loss. Having said
5 that, we also understand the philosophical
6 concern of some, but not all, organic
7 consumers.

8 We propose that the current rule
9 be allowed to expire as scheduled in 2014, and
10 be replaced by a rule that allows antibiotic
11 use only when blight risk is high, as
12 predicted by computer models or actual orchard
13 observation.

14 The organic system plan must
15 address prevention through measures such as
16 sanitation and pruning, as well as other
17 preventive inputs. In this period, it would
18 hopefully allow time for other alternatives to
19 be developed in increased quantities of
20 blight-resistant root stocks.

21 Finally, after that period,
22 transition to an even more restrictive rule,

1 and I understand there might be some legal
2 complications with this. But a more
3 restrictive rule, that allows use of
4 antibiotics in emergency situations, and in
5 that case, the fruit treated with antibiotics
6 would not be sold as organic that year.

7 Sacrificing one year's crop in
8 order to save the entire block seems to be a
9 reasonable compromise. If you have any
10 questions about the differences between the
11 Midwest and other parts, like Washington, why
12 orchards planted since 1995 are still at risk,
13 and why some growers don't use antibiotics and
14 others do, I'd be glad to answer those.

15 CHAIRMAN STONE: Very good.
16 Francis.

17 MEMBER THICKE: Thank you. It's
18 good to hear from somebody from the Midwest.
19 I'm curious. In Wisconsin and the Midwest, is
20 tetracycline used widely, or is it mostly
21 strep?

22 MR. MANDLEY: It is not used

1 widely. It is used -- strep would be more,
2 would be more commonly used, and even strep is
3 not used widely. The data that I heard from
4 Cornucopia, that only a relatively small
5 percentage of growers have used antibiotics,
6 would include me. I respond to that, and in
7 six years I have had my organic orchard and I
8 took over an abandoned orchard. In the six
9 years I've managed organically, I have never
10 used antibiotics.

11 But it is in my plan, simply
12 because certain conditions I would have no
13 other options. But it would be strep that
14 would be probably more commonly used.

15 MEMBER THICKE: And can you review
16 again what your recommendation is? Did you
17 say four years or five years of allowing it,
18 and then an amnesty program after that?

19 MR. MANDLEY: We suggested that
20 the current rule expire as scheduled in 2014,
21 and it be replaced by a more restrictive rule,
22 and then, you know, our hope is other things

1 will happen after that point.

2 But if they don't, that then
3 would, after another sunset, would be replaced
4 by an even more restrictive rule, that would
5 say organic fruit can't be sold as organic in
6 the year that an antibiotic is used.

7 Taking away that consumer concern
8 that I'm consuming antibiotics, even though
9 what research we have seen indicates that it's
10 not so.

11 CHAIRMAN STONE: Calvin? John?

12 MEMBER FOSTER: Can you bring that
13 recommendation to the next meeting?

14 MR. MANDLEY: We'll try.

15 MEMBER FOSTER: Okay, thanks.

16 MR. MANDLEY: We will certainly
17 bring it in some fashion.

18 CHAIRMAN STONE: Nick.

19 MEMBER MARAVELL: Do you have any
20 experience or knowledge of any of your growers
21 in that region using some of the materials
22 that we have been discussing here, lime,

1 sulfur, copper and the Blossom Protect,
2 outside of the research environment? But have
3 you any of your growers started down that road
4 already?

5 MR. MANDLEY: Oh, way more than
6 started. Copper in late dormancy is a common
7 protectant. Most of the growers that I've
8 talked to personally about this issue practice
9 orchard sanitation and good pruning.

10 One of the things that needs to be
11 understood is you never, ever, ever get rid of
12 fire blight. Once it's in your orchard, it
13 will always be in your orchard until you burn
14 the orchard.

15 So you can protect against
16 outbreak, but you can't do anything in the
17 current environment to assure that you will
18 not have an outbreak. What I should be doing
19 right now, rather than being here in Oregon,
20 is spraying copper. That was on my plan. So
21 the next week.

22 MEMBER MARAVELL: Are you aware of

1 anybody that's using the Blossom Protect?

2 MR. MANDLEY: No. As I said, the
3 initial research at Michigan State that they
4 did indicated that it simply didn't work, and
5 scientists there tried to explain why,
6 probably, and it kind of went over my head.
7 But it has to do with humidity and the product
8 itself.

9 CHAIRMAN STONE: Jay, you want to
10 finish this up, please?

11 MEMBER FELDMAN: Well thanks for
12 your creative thinking. We appreciate it. We
13 need it.

14 One of the reasons that there's
15 sort of a concern about writing an annotation
16 on National List material is that we have this
17 tendency of extending those things. And how
18 would you feel about removing the material and
19 putting it in an emergency use category that
20 would be dependent upon a national or state
21 finding of an emergency, which given what
22 we've heard, wouldn't seem to be too

1 difficult?

2 And then following the rest of
3 your proposal, which is to allow its use, not,
4 you know, retain certification without being
5 able to market in the year of use?

6 MR. MANDLEY: Yeah. I would be
7 against that, solely because I might have a
8 hailstorm, and my neighbor five miles from me
9 might not have the hailstorm. So the issue of
10 the emergency use wouldn't cover what we
11 experience in the Midwest, and that's very,
12 very localized conditions, where I need it and
13 someone else doesn't.

14 MEMBER FELDMAN: Localized
15 conditions. No, but if it could address
16 localized conditions. I mean --

17 MR. MANDLEY: If it somehow could
18 address localized conditions --

19 MEMBER FELDMAN: EPA uses
20 emergencies all the time on a county by county
21 basis. It just has to be declared by the
22 governor, you know, or his representative. So

1 the question is would you feel comfortable?
2 I guess in this case it could be declared by
3 NOP. But would you be comfortable, assuming
4 there could be --

5 MR. MANDLEY: Let's see. How long
6 does the NOP take to do this?

7 (Laughter.)

8 MEMBER FELDMAN: They could --
9 well, the way I would see it working is they
10 would have to have a standing allowance, based
11 on certain conditions, that that would qualify
12 as an emergency.

13 MR. MANDLEY: And I think that's
14 sort of what we were suggesting, because we do
15 understand the difficulties and the reasons
16 why unrestricted use is not wise. We do
17 understand that.

18 MEMBER FELDMAN: Okay, thank you.

19 CHAIRMAN STONE: All right. Thank
20 you very much for taking time to be here.

21 MR. MANDLEY: Thank you.

22 CHAIRMAN STONE: Neal Manley to

1 the podium. No Neal. Melody Meyer? Melody's
2 coming this way, and Sal D'Auria on deck.

3 MS. MEYER: Hello. Thank you for
4 letting me be here to speak about
5 oxytetracycline. Let me begin by emphasizing
6 that I work for UNFI, and UNFI is completely
7 and absolutely committed to ending the use of
8 antibiotics in apple and pear production.

9 I've worked in the organic
10 industry for 36 years, and mostly with organic
11 fruits and vegetables. So I have great
12 experience with organic apple and pear
13 farmers.

14 A little bit about UNFI. You saw
15 it on the board. UNFI is the leading
16 independent national distributor of organic
17 foods and organic produce in the U.S. We have
18 national distribution coverage in all 50
19 states, including Canada. We're the leader in
20 providing organic foods in North America, with
21 7,000 associates, serving 27,000 customers
22 with 65,000 products.

1 We're also a member of the Organic
2 Produce Wholesalers Coalition, which Natalie
3 mentioned as well. That coalition is a group
4 of founding members of this industry, and
5 we're very concerned about this issue.

6 Organic apple and pear sales are a
7 critical sales category for Albert's Organics,
8 which focuses on the distribution of organic
9 produce for UNFI. Organic apples rank number
10 two in sales, only behind berries. Organic
11 Northwest apples represent 22 percent of all
12 fruit sales, and are nine percent of total
13 produce sales for Albert's Organics.

14 Last year's sales from Northwest
15 apples alone were \$16 million, as the slide
16 showed. Our year-over-year growth for
17 Northwest apples was 21 percent, making this
18 category one of our fastest-growing.

19 Organic apples and pears are not
20 only an important category to us at Albert's
21 and UNFI, but they're also a source of
22 nutrition, great pride and flavor for us, in

1 that we make these apples and pears available
2 to people all across the U.S. and Canada.

3 Additionally, organic apples and
4 pears are the source of livelihood for over
5 100 organic growers that we purchase from in
6 the Northwest. Many of these producers rely
7 entirely on their organic fruit production to
8 support their families. We have known and
9 worked with these producers for over three
10 decades. Put simply, many are like family to
11 us.

12 Many and most of our growers have
13 told us that if the tools currently needed to
14 fight fire blight are taken away too early,
15 and without viable alternatives, they may have
16 no choice but to convert to conventional
17 production. A typical orchardist has a
18 \$20,000 per acre and a five year investment in
19 their orchard.

20 Pears take 10 to 12 years at
21 minimum to start producing. In seasons of
22 severe fire blight, the very hard decision

1 will come down to do I lose my entire orchard,
2 or do I convert to conventional production and
3 save my investment?

4 Losing an entire orchard is not a
5 temporary setback. It's devastating on a
6 personal and family level. Losing an organic
7 producer is devastating to this industry, and
8 affects everything all the way down to the
9 consumer. It has ripple effects.

10 If the selected extension date
11 does not provide enough time for scientific
12 remedy to be developed and the proper tools to
13 be acquired, to the grower, the decision is a
14 clear one.

15 Please support our producers and
16 family farmers who are the real backbone of
17 rural communities. They will bear the
18 greatest impact of any premature deadlines.

19 UNFI and Albert's is absolutely
20 committed to ending the use of antibiotics in
21 pear and apple production. A 2017 expiration
22 date will support current research and

1 testing, and allow for grower education and
2 success.

3 The expiration dates need to be
4 based on research-based time lines, not
5 political compromise. The original deadline
6 that we have now was put forward without
7 public comment.

8 Expiration dates that are the
9 result of -- and thank you very much. I have
10 more experience with some consumers, if you
11 want to ask me those questions as well. Thank
12 you.

13 CHAIRMAN STONE: Thank you,
14 Melody. Harold.

15 MEMBER AUSTIN: Could you go ahead
16 and explain to us your experience with your
17 consumers?

18 MS. MEYER: Absolutely. Since
19 we've had a lot of the consumer associations
20 and people coming out with quite frankly some
21 misinformation, that your gut is full with
22 every bite of apple, we've had a lot of

1 consumers, retailers and their consumers
2 calling us.

3 We put together some really
4 educational talking points about the minuscule
5 amounts that are used, it's used during
6 blossom primarily, and also the effects of if
7 this is done prematurely, it will drive many
8 organic orchardists into conventional
9 production, in which case we have more
10 antibiotics used, potentially more chemicals,
11 because they're in conventional production.

12 There won't be as many apples and
13 pears, so that will drive the price up, and
14 the average organic consumer won't be able to
15 feed organic apples and pears to her children,
16 his or her children.

17 So the ramifications are huge, and
18 just to have that information to those
19 consumers and give them a balanced approach
20 rather than misinformation is very, very
21 important, and I think that we can manage
22 that, serve the grower community and the

1 consumer community as well.

2 CHAIRMAN STONE: Great. Thank you
3 very much.

4 MS. MEYER: Thank you. Thanks for
5 all the work that you're doing.

6 CHAIRMAN STONE: Sal D'Auria is to
7 the podium, and David Mostin on deck.

8 MR. D'AURIA: Well, thank you very
9 much, and thanks, Mac. My name is Sal
10 D'Auria. Thanks for pronouncing it correctly.
11 My wife and I have an organic orchard up in
12 the upper Hood River Valley.

13 I met a number of you earlier this
14 week, and I think in the fun part of your week
15 when you're actually outside seeing trees and
16 not stuck in a room here.

17 Thank you for doing the job you're
18 doing. You guys have a very, very difficult
19 decision to make. You've got a difficult job.
20 I definitely do not envy you, because the only
21 thing I'm sure about your decision is that
22 whatever the decision is, is that some people

1 will not be happy with it. That's the only
2 thing that's for sure.

3 But I think that you should take
4 some comfort in the thought that if you apply
5 science and logic and a healthy dose of
6 pragmatism, you'll be doing a great job for
7 everybody, and that's a terrific thing.

8 I've really enjoyed the last day
9 or two here. I've learned a lot. I've been
10 inspired, but I've also been somewhat
11 disappointed. Some of the presentations I've
12 seen mixed, a lot of different language.

13 The language like "possible" and
14 "probable" are two very different words in the
15 science world, and some people I saw mix those
16 things in ways that I think could be
17 misleading.

18 I think that the mixture of facts
19 and opinions is something one needs to watch,
20 and I'm going to try my best to stick to a
21 bunch of facts and tell you when I tell you my
22 opinions on those various things.

1 Jay, you did a great job the other
2 day of helping me frame this massive amount of
3 information that we're putting together here,
4 and I should tell you that my background's in
5 science, and I spent the last 25 years in the
6 world of developing products in the R&D
7 environment and dealing with very complex
8 problems.

9 So if I could have the slide. I
10 can't find my slide. If you can't find the
11 slide, I'll just say that -- just to keep
12 track of things, I said, okay, how do we frame
13 this to kind of like do a report card of where
14 we are. Hopefully, we'll get this and I can
15 get a few minutes back here.

16 The thing that Jay really
17 impressed me with the other day was the
18 concept that what you're dealing with is a
19 balancing act between need and hazard. I
20 think those were some of the words that I
21 heard a number of times from you, Jay, and
22 they were very important for me to hear and

1 help frame this thing.

2 So if you look at -- did you find
3 it? Okay, thank you. So if we look at this
4 balancing act that you all are dealing with
5 and look at these sort of two columns, the
6 need column on the left and the hazard column
7 on the right and see how it all adds together.
8 I can tell you again I'm trying to do my best
9 to give you the facts of the real world of my
10 own orchard.

11 On the needs side, we've heard
12 this and you've heard it many times, popular
13 varieties are at risk. I know that we, our
14 highest values pears are Comice and Forelles,
15 and Star Crimson next. Those are very at-risk
16 varieties.

17 We also heard that the
18 combination, the vectors coming together of
19 gross cycle, climate and weather will cause
20 this very severe problem, and some people will
21 have it based on their geography and some
22 people will not. But if you provide cultural

1 practices, sanitation practices and you do
2 those every single day, every part of the
3 cycle, that helps the process.

4 But, but, if you don't do that and
5 if you don't have the tools of
6 oxytetracycline, you will lose your trees.
7 Now, let me ask you, you know, how many
8 products, how many materials are on the list
9 that have to do with losing a crop, period?
10 I know lots of products, you know, these
11 products will make your fruit bigger. These
12 will make them more colorful. These will stop
13 them from dropping off the tree.

14 This product is about stopping
15 death in the orchard. How many others are on
16 the list? I don't know too many. I know I
17 don't use any other products that have that
18 effect on my crops.

19 So on a scale of sort of nice to
20 have, because it makes better color, to
21 critical because I'll lose my orchard, I think
22 you can guess that I would say, if it's about

1 death, if it's about critical, I don't know
2 what your scale is, but I would say it pins
3 the scale for any logic I know.

4 On the hazard side, I think you
5 need to break it down. I think this is
6 really, really important, because it's so
7 important, you know. Hazard both to the
8 consumer and also to the environment. We have
9 to think about that. We are organic farmers.
10 We believe in this.

11 Jay asked me the other day, why do
12 you do this? Well, we do this because we want
13 good food for our kids, our families, for now
14 and in the long future.

15 The reality is that, in our
16 orchard, this is never sprayed on mature
17 fruit. It's sprayed at bloom, and when those
18 vectors are and the Cougar model tell us it's
19 a bad thing, and my certified consultant tells
20 me and signs a paper that this is the time I
21 need to use it.

22 Last year, we had blossom about

1 May 1st on our Comice, and we picked them
2 October 1st. That was five months later.
3 The earliest pear was four months later from
4 the bloom. So four to five months before the
5 picking.

6 I want to make it clear -- can I
7 get a couple of minutes more, because of my --
8 or did you reset it? I just want to say that,
9 you know, from a -- are we okay? I have a
10 minute. So again, this product is not
11 synthetic. It is naturally occurring. I
12 heard some people say, oh, it's synthetic.
13 It's not. You guys, I think, know that.

14 I took Jay's advice last night and
15 I looked and looked and I found 273 hits on
16 your website, looking for some primary
17 research on residue.

18 I'm sorry I didn't read every
19 single one of them, but I couldn't find one.
20 I heard some great things today. I think
21 there's some great science out there that
22 should not be disregarded.

1 And again, relative to scale, from
2 a consumer perspective, you know, from what
3 I've heard and what I know to be factual, I'd
4 think that on the relative scale this is on
5 the low scale relative to consumer, immediate
6 consumer hazard.

7 On the environmental side, there's
8 no question. I think that we all want to see
9 -- the doctor today did a great job of
10 explaining to us about the long term impact of
11 those things. We want to see those things go
12 away. We want to see other products that we
13 can use to help get us around this.

14 But, but, organic is -- I'm saying
15 less than five percent. It really was less
16 than -- a lower number than that, you know.
17 It's a very, very small number, and on the
18 relative scale, it doesn't move the scale that
19 much.

20 I believe that those are facts on
21 this chart. The next slide, just real
22 quickly, just to say, if I were to summarize,

1 I'd say that on the needs side, in this
2 balance, the need is critical. These are dead
3 trees. I don't know how you don't pin it to
4 critical.

5 On the hazardous side, I'd say,
6 pragmatically speaking, all things considered,
7 this is my opinion, that the hazard for both
8 the consumer perspective and the long-term
9 environmental perspective is relatively low.
10 Thank you.

11 CHAIRMAN STONE: Thank you very
12 much.

13 MR. D'AURIA: Any questions?

14 CHAIRMAN STONE: Great. Thank you
15 very much. Thank you for helping to educate
16 us on the tour as well.

17 MR. D'AURIA: You're welcome.

18 CHAIRMAN STONE: David Mostin to
19 the podium, and Addie Pobst on deck.

20 MR. MOSTIN: Good afternoon. I'm
21 David Mostin. I'm a third generation pear
22 grower in Lake County, California, in the

1 coastal mountains north of San Francisco. My
2 oldest block of trees was planted in year
3 1900. We call it the old orchard. I've been
4 an owner operator for 33 years. I've been
5 certified organic since 2002.

6 I also operate other orchards that
7 are both conventional and organic. I am
8 concerned with the loss of an effective
9 material, such as oxytetracycline, without the
10 opportunity to replace it in a reasonable
11 amount of time.

12 Following is my experience with
13 replacing materials and new materials. In
14 1996, the University of California Cooperative
15 Extension began field trials of pheromone
16 confusion products. I had several of my
17 orchards involved. The problem was the
18 increased resistance of codling moth to
19 organophosphate. After many years of field
20 trials, we were able to drop out the
21 organophosphates. Yet we still had it
22 available if the pressure got out of hand.

1 Eventually, the developed pheromone program
2 replaced the organophosphates as a standard
3 for conventional production.

4 After several years of proven
5 stand-alone effect of this pheromone program,
6 I saw the opportunity of transitioning to
7 organic production. Even though pheromones is
8 now the industry standard in our area for both
9 conventional and organic, the research
10 continues. In the 2011 California Pear
11 Research Report, three of the four projects
12 were about pheromones.

13 During that same time period, my
14 orchards were involved in the A506 BlightBan
15 trials. This material is a live bacteria that
16 is applied to out-compete other bacteria, one
17 of which is blight. Two weeks ago, we began
18 testing, or actually last week, a new
19 material, Blossom Protect. Never used it
20 before.

21 We've heard about the Michigan
22 trouble with it. This is a yeast-based

1 material that out-competes blight. It does
2 not kill it. It's also double the cost of
3 antibiotics. In the 2011 California Pear
4 Research Report in the Plant Pathology
5 section, three out of three projects were on
6 fire blight. In the 2012 California Pear
7 Research Report, three of four projects were
8 on fire blight.

9 Next year, we hear that there will
10 be a new Blossom Protect material that
11 combines copper with yeast. The combination
12 has been shown to be more effective than
13 either material by itself.

14 This year, I will apply four
15 different materials to control fire blight,
16 not including the tests with new products.
17 Every year is different. This year, we
18 received 80 percent of our annual rainfall in
19 less than six weeks, and then went two months
20 with nothing.

21 Now we are in the middle of bloom,
22 and we have no frost threat, but we have

1 storms every four to seven days. The 16 years
2 of experience with pheromone BlightBan
3 research showed us it is easy to get good
4 results on a good year, one with light
5 pressure.

6 When things turn ugly and there is
7 ideal conditions for blight infection, then
8 you find out how effective your product is.
9 During the years of research, the rates and
10 timings of these new products were developed.
11 Even when the new product becomes the
12 standard, we strive for better.

13 For many years, during the
14 pheromone transition, we had materials
15 available, yet we did not use them unless the
16 pest population became unmanageable. The same
17 holds true for fire blight materials.

18 A year or two of exceptional
19 weather conditions can make all the difference
20 in the world for a new standard of grower
21 inputs to this operation. Thank you.

22 CHAIRMAN STONE: Thank you.

1 Questions for David? Nick.

2 MEMBER MARAVELL: Yes. I want to
3 get an idea of how familiar you might be with
4 Blossom Protect, and what some of the
5 potential pitfalls might be of that, since
6 you've had a lot of experience introducing new
7 products into your orchard.

8 What's your, just, you know, off
9 the top assessment, what could be some of the
10 problems with that?

11 MR. MOSTIN: When we started the
12 A506 project, there was a lot of monkeying
13 around with timing and rates, and it took a
14 couple of years in different kind of
15 springtime weather conditions, to figure out
16 what works, you know. You know, you can put
17 it on in an easy year and, you know,
18 everything's fine.

19 But you get an odd year and you
20 find out what, you know. So yeah, I would
21 expect and Blossom Protect, six days ago, I
22 never used it before. So I've got like zero

1 experience. In fact, I'm supposed to put it
2 on again tomorrow. I've got to get out of
3 here.

4 But you know, the A506 material,
5 they went to like one shot early in finger
6 stage, you know, worked great. Multiple
7 shots, and it changed, based on the weather
8 conditions.

9 So I expect the yeast material is
10 very similar. You've got to play with it, you
11 know, and if we have a secondary material that
12 is similar to A506 that out-competes it, okay,
13 from what I understand, that new tissue,
14 there's nothing on it. The bacteria will
15 colonize it, and unless you take up the sites
16 and blight is always there. Blight is always
17 there.

18 In 1982, we had a killer hailstorm
19 come through the first week of June. At that
20 time, we were using copper, copper dust.
21 That's like old school. What a mess. I don't
22 want to do that again. So you know, and I've

1 been doing for three years the delayed dormant
2 copper application. Never done that before in
3 my life.

4 And all these research programs,
5 they're for the total California pear
6 industry, not just the small amount that's
7 organic. And yet like the pheromone and the
8 A506, they weren't developed for organic.
9 They just developed them and we're using them
10 good.

11 CHAIRMAN STONE: Tracy.

12 MEMBER FAVRE: First of all, I'd
13 like to thank you for coming. We should all
14 be humbled by folks like yourself, who take
15 time out of your busy schedule to make the
16 time and effort to come to speak to us, and it
17 is appreciated. So thank you.

18 My question for you is should you
19 not have the option for oxytet in your organic
20 pear program, what do you think your
21 alternatives would be?

22 MR. MOSTIN: I think it's -- I

1 think that using multiple products that are
2 allowed, it's a matter of timing and rates and
3 research, a track record of what works and
4 what doesn't. Not having a material like
5 that, it's going to hurt. It's going to hurt.

6 When we phased out the
7 glutathione, we had really good success, and
8 it's been 16 years, and we had a research
9 project on it this last year. They're trying
10 to get the application amounts to half of what
11 the standard is this year. So we're trying to
12 reduce the materials put out there, and yet
13 maintain the effectiveness.

14 And you know, two years from now,
15 maybe there's something else that comes on the
16 market that will help us. But the fact
17 remains that if you do get a hailstorm post-
18 bloom, then you're in trouble. In that 1982
19 event, I had trees that had 20 cases of blight
20 in it. We probably cut ten percent of our
21 crop onto the ground because of the blight
22 infection.

1 And you can't wait. If it hails
2 now, I walk out my back door, jump on a spray
3 rig and start spraying. You can't call
4 anybody or get permission. You've got to go.
5 We spray when the trees are wet. We don't
6 even wait for it to quit raining.

7 Usually, it's just like a five
8 minute hailstorm, and I may get hit. My
9 neighbor a quarter mile away doesn't. That's
10 what happened. It was like a half mile wide
11 swath right through the pear growers in the
12 Valley, and you can't wait for a disaster
13 declaration, like in the -- like the crop
14 disaster stuff that, you know, have to have 30
15 percent loss over the total county.

16 It doesn't happen. We've got six,
17 seven different microclimates. The guys in
18 Scott's Valley, they get hailed on almost
19 every year. I'm out in Big Valley. I see it
20 coming, and hope it goes left or right. So
21 yeah, no. It's just, if we don't got it, then
22 you just sharpen up your chainsaw. We had to

1 take trees out because we could not control
2 it.

3 MEMBER FAVRE: But leaving the
4 organic program would not be a consideration
5 for you?

6 MR. MOSTIN: Oh geez. Well
7 probably if I would leave the program if I got
8 wiped out. Let me put it that way, okay?

9 CHAIRMAN STONE: Francis, if
10 you'll finish this out.

11 MEMBER THICKE: Real quickly. I
12 just wanted to thank you for what you're
13 doing, you know. You're the innovator that we
14 really need to get out there, the pioneer to
15 do it. Thanks.

16 MR. MOSTIN: Okay, thank you.

17 CHAIRMAN STONE: Thank you, David.

18 MR. MOSTIN: If I don't get home,
19 I put my wife on the sprayer.

20 (Laughter.)

21 CHAIRMAN STONE: Yeah. You'd
22 better get home. Addie Pobst to the podium

1 and Nate Lewis on deck.

2 MS. POBST: Hi. My name is Addie
3 Pobst, and I'm with VivaTerra Organic. We are
4 a Washington-based sales agent with 20 years
5 of experience marketing organic fruits and
6 vegetables. Organic apples and pears are the
7 core of our business.

8 In 2012, we worked for U.S.
9 growers with over 3,000 combined acres of
10 organic apples and pears, and their harvests
11 brought them over 9.8 million in returns. We
12 represent independent organic growers, ranging
13 in size from four to four hundred acres.

14 On their behalf, I urge you to
15 support an extension for tetracycline. A
16 premature transition to non-antibiotic
17 alternatives that are not consistently
18 effective will undermine apple and pear
19 production in the U.S.

20 The sunset time frame must be
21 extended, so that alternatives can be
22 developed, tested, proven and made

1 commercially available to growers. The
2 importance of antibiotic controls is difficult
3 to overstate. Fire blight does not cause
4 trees to die back; it causes them to die, and
5 quickly.

6 It does not respect orchard
7 boundaries, size or ideological purity. It
8 spreads incredibly fast. It does not infect
9 just a few trees; it spreads across acres and
10 acres of orchards, and it kills them. The
11 only cure for fire blight is a bulldozer and
12 a bonfire.

13 Antibiotics do not cure fire
14 blight, but they can protect orchards from
15 contracting this devastating bacterial
16 infection. In years when predictive models
17 indicate spring conditions are ripe for an
18 outbreak that would overwhelm the protection
19 granted by other techniques, antibiotic
20 controls are critical.

21 This is not a debate about a
22 substance used to grow prettier or larger

1 fruit, or for some other convenience. It's
2 about the actual life of the trees, and by
3 extension, the livelihood of growers, workers,
4 their families and communities.

5 The risk of losing entire orchards
6 representing years of work and thousands of
7 dollars is simply too high. Growers already
8 face all the inherent uncertainties of
9 agriculture. A year's crop can be lost due to
10 late frost, hailstorms, windstorms, heat
11 waves, labor disruptions and market upheavals.
12 Any farmer can tell you a dozen such stories.

13 But after these disasters, growers
14 still look ahead with hope to the next year's
15 harvest. Fire blight doesn't leave a stricken
16 orchardist with even that hope.

17 As long-time members of the
18 organic community, our company and our growers
19 emphatically agree on the goal of phasing out
20 antibiotics. Great strides have been made
21 towards the development of effective non-
22 antibiotic controls for fire blight.

1 However, simply wanting an
2 alternative to exist by a certain date does
3 not make it so. Research takes time.
4 Prematurely eliminating antibiotics will drive
5 organic growers back to conventional methods.
6 Maybe not in the first year, because fire
7 blight doesn't strike everywhere every year.

8 But when that fateful spring comes
9 and conditions put their orchard at high risk,
10 growers will surely choose to use antibiotics
11 and lose their organic status, rather than
12 watch their orchards die. Once a grower has
13 taken that step and lost his or her organic
14 status, economic realities will mean going
15 full-blown conventional, in order to compete
16 in the conventional market.

17 Eliminating antibiotics from the
18 allowed synthetics list in 2014 will not
19 reduce the amount of antibiotics in U.S. fruit
20 production. Instead, it will increase the
21 risks faced by organic growers beyond what
22 they can stand. It will reduce the

1 availability of U.S.-grown organic apples and
2 pears for consumers.

3 Most damaging of all, it will
4 hobble efforts to develop non-antibiotic
5 alternatives that can eventually be used by
6 all producers, conventional and organic.

7 Thank you for your time. Please support the
8 extension to give researchers the time they
9 need to develop the solutions we all want. If
10 you have any questions about consumers or how
11 the organic tree fruit market works, I'd be
12 happy to answer them.

13 CHAIRMAN STONE: Thank you.
14 Harold.

15 MEMBER AUSTIN: Thanks, Addie.
16 What conversations have you had with your
17 customer base and consumer base in this
18 regard?

19 MS. POBST: We receive emails from
20 end consumers, as well as from our direct
21 customers who are retailers and wholesalers
22 regarding this issue. More so in the last

1 four or five months, there's been a definite
2 up-tick in interest.

3 Prior to that, we've had an FAQ
4 available on our website for years, in case
5 anybody was interested. We certainly weren't
6 hiding the fact that tetracycline was used, or
7 antibiotics were used, in organic tree fruit
8 production.

9 The questions that we've gotten
10 are generally just very straightforward, you
11 know, something along the lines of, you know,
12 my mom told me that she heard a radio program
13 that said that antibiotics were used in
14 organic tree fruit. Is that true?

15 And we answer back with an email
16 that says, yes, that's exactly true, but here
17 are the reasons why and, you know, this is how
18 it's allowed, this is how it's regulated, you
19 know. We're very open with that information,
20 because we would really like everybody
21 involved in the organic community to actually
22 understand that this is not some nefarious

1 scheme or conspiracy. This is just a reality
2 of agriculture.

3 Typically, I don't hear back from
4 them again after that, so I can't really say,
5 you know, how it goes from there. But I feel
6 like at least we've done our part to be open
7 and honest with anybody who's interested.

8 CHAIRMAN STONE: Great. Thank you
9 very much.

10 MEMBER FELDMAN: Thanks, Mac.
11 Thank you. How would you feel about the
12 possibility of labeling apples with some
13 language that indicates they've been treated?

14 MS. POBST: You know, honestly, I
15 can't see that even working a little bit. Not
16 because we couldn't put labels on boxes. We
17 can put labels on boxes. We do that all the
18 time. That's a normal occurrence for us.

19 But I would say, if you look at
20 how the country of origin labeling has been
21 instigated or actually effectively implemented
22 in the country, I go regularly into retail

1 stores where I see fruit that has a PLU
2 sticker on it that very clearly says "Chile,"
3 say, as the country of origin, and directly in
4 front of that there's a little handwritten
5 sign, or maybe it's a little chalkboard or one
6 of those little, you know, POP signs that
7 sticks up, and it says "California."

8 If we can't even get country of
9 origin labeling on a one-word label correct at
10 the retail level, I mean, a sentence that
11 says, "This fruit was grown in an orchard that
12 was treated last spring with tetracycline in
13 order to control fire blight." To actually
14 get that at the retail level on display, you
15 know, in a way that's going to make sense to
16 anybody in any kind of accurate way, just
17 strikes me as not likely.

18 CHAIRMAN STONE: Thank you, Addie.
19 Nate Lewis to the podium and Anne Schwartz on
20 deck.

21 MR. LEWIS: Distinguished members
22 of the Board, my name's Nathaniel Lewis, and

1 I work as one of three certification
2 coordinators at Washington State Department of
3 Ag. My role covers the coordination of our
4 input material registration program, the
5 organic certification of processors and
6 handlers, and our periodic residue sampling
7 program.

8 I'm owner and operator of a
9 certified organic livestock operation, located
10 about 90 minutes north of Portland, Lincoln
11 Creek Ranch, where we're now starting to
12 implement biodynamic practices. I'm also a
13 father and organic consumer who doesn't feel
14 betrayed by the limited use of oxytetracycline
15 in organic apple and pear production.

16 While today I'm representing the
17 views of WSDA in the following public comment,
18 nothing I'm about to say conflicts with my own
19 personal opinions as an organic producer and
20 consumer.

21 The minority position within the
22 Crop Subcommittee recommendation on

1 oxytetracycline uses previous public comment
2 from my colleague at WSDA, Katherine Withey,
3 to support conclusions that are uninformed and
4 inaccurate.

5 Since our organization is
6 specifically called out in the recommendation,
7 we felt it appropriate to comment directly on
8 these statements. First, there are no
9 producers in full compliance with the USDA
10 organic regulations that rely on
11 oxytetracycline. Compliant producers rely on
12 their preventative management plan and use the
13 oxytetracycline only when their plan is
14 failing.

15 Second, the minority concludes
16 that since, in 2010, 96 producers grew apples
17 and pears for EU export, meaning without
18 oxytetracycline, they must be doing something
19 fundamentally different than producers who had
20 applied antibiotics.

21 This is an uninformed and
22 therefore illogical conclusion. Many

1 producers who grow apples and pears in
2 compliance with the EU restrictions, without
3 oxytetracycline, also grow varieties of
4 organic apples and pears that receive
5 oxytetracycline treatments.

6 These split operations do not
7 implement different preventative practices on
8 their various production sites. Rather, these
9 producers fall victim to the unpredictable and
10 hyper-locale-specific nature of this disease.

11 Third, the minority advocates for
12 the use of other 601 listed materials, lime
13 sulfur, dormant oil, copper, et cetera, as
14 part of a prevention program for fire blight.
15 To advocate for the use of one synthetic
16 disease control material over another is
17 inconsistent with the current requirements of
18 the Pest, Weed and Disease Prevention Practice
19 Standard, and we find encouraging these
20 practices to be problematic.

21 I would like to provide general
22 comment on the use of expiration dates and

1 National List annotations. We feel the use of
2 any annotations that are redundant to the
3 current practice standards in OFPA, like
4 expiration dates, required pest prevention
5 hierarchy, detracts from the certification
6 process.

7 These type of annotations demand
8 to certifiers utilize their communication
9 resources to convey the myriad of changes and
10 restrictions on specific materials. This
11 inherently detracts from our efforts to
12 communicate the requirements of practice
13 standards. The appearance of focusing on
14 materials runs counter to the process-based
15 approach of organics we all champion.

16 The Board should use the power to
17 annotate carefully, and it's absolutely
18 critical to any annotation, whether redundant
19 to the current standard or not, have adequate
20 defensible justification.

21 Lastly, this phase-out of
22 oxytetracycline has highlighted the importance

1 of fostering our land grant university
2 cooperative extension and farmer collaborative
3 process.

4 The Subcommittee resolution urging
5 certifiers to encourage an increase in
6 specific preventative practices is a challenge
7 we're excited to meet. We strive to make
8 strategy our strength and not disaster.

9 CHAIRMAN STONE: Great. Thanks,
10 Nate. Questions? Very good. Thank you very
11 much. Very informative.

12 Anne Schwartz to the podium, and
13 Jeff Falen on deck.

14 MS. SCHWARTZ: To members of the
15 NOSB, my name is Anne Schwartz. I'm a mixed
16 vegetable and berry producer. I've been
17 farming organically since 1979, and I've been
18 certified since 1980. I have devoted my life
19 to the development of organic farming systems.

20 I represent Tilth Producers of
21 Washington, a state-wide association of
22 organic and sustainable growers, researchers

1 and agricultural businesses. Our growers
2 represent a wide diversity of crops, regions
3 and scale across the state. We are asking the
4 Board to approve the Crops Subcommittee
5 proposal providing an extension of the use of
6 tetracycline in tree fruit until October 2016.

7 This time table supports the
8 growers, and ultimately consumers, who both
9 want safe, healthy food, as well as supporting
10 family farmers and rural communities, which we
11 believe is the backbone for a sustainable
12 farming system.

13 Many consumers have been misled by
14 the lies perpetuated by consumer groups that
15 presumably have their best interest at heart.
16 The use of antibiotics in organic agriculture
17 is far too complicated to explain in 30
18 seconds. Distilling it to erroneous
19 statements does much harm to our industry.

20 "It's hard to believe, but every
21 time you bite into an organic apple or pear,
22 you get a mouthful and a gutful of

1 antibiotics." This doesn't help any of us.

2 Rather than guiding consumers to
3 an understanding of how and why antibiotics
4 are used, that they are based on naturally-
5 occurring compounds, that the industry is
6 working tirelessly to find alternatives to
7 these exceptions, these groups have instead
8 presented antibiotics as evil, ignoring the
9 truth that may be found in the carefully
10 developed rules of the Organic Foods
11 Production Act.

12 The original language of OFPA
13 specifically allowed limited and restricted
14 use of antibiotics in both livestock and
15 cropping systems. This allowance was not a
16 loophole. It is based on a national dialogue,
17 which is based on science, review and process,
18 all of which are transparent and in the public
19 record.

20 We believe it is a disservice to
21 consumers to have complicated issues reduced
22 to sound bites. The reason that less than one

1 percent of Americans are farmers has something
2 to do with the risks and the amount of work it
3 takes to operate a successful, sustainable
4 farm.

5 As growers grapple with the
6 constant realities of farming, even informed
7 citizens don't really understand what it takes
8 to produce food and stay in business. We
9 believe that the American people don't want to
10 do farm work for five or ten dollars an hour,
11 and the alternatives are relying on imported
12 food.

13 Consumer and environmental
14 organizations should be educated and taking
15 action about the most important causes of
16 antibiotic resistance, which are non-
17 therapeutic use of antibiotics in livestock
18 feed and injectables, and in the regular,
19 routine use of anti-microbial soaps used by
20 consumers today.

21 At the core of Tilth's mission in
22 Washington is the promotion of ecologically

1 sound and economically viable farming
2 practices, that improve the health of our
3 communities and natural environment. We
4 educate growers and support efforts to allow
5 for the continued expansion of organic and
6 sustainable agriculture.

7 These issues are complicated. The
8 work that all of you do, NOSB and NOP staff,
9 is important and thankless. With only one
10 percent of Americans choosing to struggle
11 daily with nature and the uncertain markets to
12 provide healthy, fresh food, our culture has
13 lost the insight into what it takes to create
14 a sustainable food system within sustainable
15 rural communities.

16 I would argue that until you see
17 your life work die in front of your eyes, you
18 really don't understand what it takes to
19 invest your life into growing food. I've
20 committed my life to making our food system
21 better. I left my farm 300 miles to the north
22 to speak on behalf of farmers and the

1 communities they live in.

2 We share the same commitment to
3 organic agriculture, but I also want to speak
4 to the commitment that the people in our
5 orchards, who are working to do better by the
6 rest of us. I hope we continue to provide our
7 commitment to ensure that organic farmers have
8 the necessary tools to succeed. Thank you.

9 CHAIRMAN STONE: Thank you very
10 much. We appreciate you driving those 300
11 miles. That's one reason we moved the meeting
12 around the country, to have access to voices
13 like yours.

14 Questions? All right. Thank you
15 very, very much for making the effort to be
16 here. Jeff Falen to the podium, and Michael
17 Crupain on deck.

18 MR. FALEN: Good day. My last
19 name rhymes with that of Sarah Palin. I have
20 found a use for a politician. So it's Falen,
21 thank you.

22 My wife and I own and operate

1 Persephone Farm, where we raise 15 acres of
2 organic vegetables and eggs two hours south of
3 here. When I moved onto the farm in 1985, I
4 entered a depleted landscape. By adhering to
5 organic principles of crop rotation, cover
6 cropping and biodiversity enhancements, we
7 have seen dramatic improvements in the health
8 of the farm ecosystem.

9 These practices have resulted in
10 higher quality produce, improved soil tills,
11 reduced fertilizer usage, a stable pH, greater
12 cold tolerance in our crops, and elimination
13 of problems with lepidoptera and aphids.

14 At the same time that we are
15 witnessing these improvements, I became aware
16 that some other organic growers were relying
17 more heavily on inputs, and giving minimal
18 regard to organic practices. We are currently
19 participating in a case study analysis of
20 several West Coast organic farms that use a
21 systems approach.

22 This study, sponsored by Oregon

1 State University, hopes to document the
2 positive changes that organic practices can
3 bring to the farm as a way to encourage other
4 growers to focus more on practices and less on
5 materials.

6 It is my belief that the NOP
7 should assist in this effort by pressuring
8 certifiers to encourage growers to view their
9 farms as a living, breathing organism, rather
10 than a substrate to which various materials
11 are applied. The focus on materials offers
12 band-aids to problems that often can and
13 should be solved through good practices.

14 Inputs are sometimes needed, but
15 more band-aids encourage growers to gloss over
16 deeper problems. I admit that I don't know
17 enough to make a science-based argument
18 concerning the materials before you. I hope
19 you carry more knowledge than I do to your
20 decisions. But I ask you to weigh heavily
21 some basic principles of necessity,
22 transparency and human health.

1 I recently spoke with an organic
2 pear and apple grower who does not use
3 antibiotics for fire blight control, relying
4 instead of resistant varieties. He also gave
5 me information which I'm sure you're aware of,
6 of research results showing effective
7 biological controls as an alternative to
8 antibiotics.

9 This is one data point, of course.
10 But I think it's important to remember that
11 many people, including myself, are alive today
12 because of these drugs, and I have personal
13 experience with antibiotics losing their
14 effectiveness.

15 If there truly is an effective
16 alternative, why take the risk of human
17 pathogens developing resistance to
18 agricultural antibiotics? I ask you to end
19 their use in organic agriculture as soon as
20 possible.

21 And not that polyoxin D should be
22 left out -- I haven't heard many people talk

1 about it -- so I hope you will consider that
2 broad spectrum fungicides harm beneficial
3 fungi as well as harmful fungi. More
4 importantly, is it appropriate to use a
5 material for which some of the ingredients and
6 processing are a secret?

7 The people who purchase and eat
8 our produce value transparency. So I feel it
9 my duty to advocate for them. I ask that this
10 petition be denied until more information
11 about the material is made available.

12 I appreciate the role the NOSB
13 plays in maintaining the integrity of organic
14 farming. I don't envy you for the judgments
15 you have to make.

16 I hope you will ask of these
17 materials, is this an unnecessary band-aid
18 solution, or does it contribute to the NOSB
19 definition of organic agriculture as, and I
20 quote, "an ecological production management
21 system that promotes and enhances
22 biodiversity, biological cycles and soil

1 biological activity." It is based on minimal
2 use of off-farm inputs, and on management
3 practices that restore, maintain and enhance
4 ecological harmony?

5 Thanks for listening. Whoa.

6 Right on time.

7 CHAIRMAN STONE: Pretty good.

8 Terry, I don't know about that one. Thank
9 you, Jeff. Questions? Very good. Thank you
10 for being here.

11 MR. FALEN: Okay.

12 CHAIRMAN STONE: Michael Crupain,
13 please correct to me of the mispronouncing of
14 your name, and Jessica Shade is on deck.

15 DR. CRUPAIN: Good afternoon. My
16 name is Dr. Michael Crupain. You got it
17 right. I'm from Consumers Union and Consumer
18 Report. So I work with Dr. Urvashi Rangan,
19 and I direct the daily operations of our food
20 safety and sustainability center.

21 I'm a physician licensed in the
22 State of New York. I'm board-certified in

1 preventive medicine. I have a Master's in
2 Public Health. I teach graduate and
3 undergraduate students at Johns Hopkins
4 University. And I've come here today to talk
5 about what is considered to be one of the
6 world's most pressing public health problems,
7 antibiotic resistance.

8 This problem is a major focus of
9 our work at Consumer Reports, as well as other
10 groups and government agencies, numerous
11 medical societies, and is a topic that I
12 lecture on at Johns Hopkins.

13 I want to stress that the basic
14 science around antibiotic resistance is not
15 controversial. Further research is always
16 helpful, but we know enough right now and
17 don't need any more research to understand the
18 dangers of using antibiotics in agriculture.

19 So let's start with the basics.
20 Antibiotics are drugs that either kill or
21 inhibit the growth of bacteria. Prior to the
22 1940's, we had very few useful tools to treat

1 people who had antibiotic-resistant
2 infections. Back then, hospital wards were
3 filled with people who suffered and died from
4 infections that have now become relatively
5 simple to treat.

6 Antibiotic resistant bacteria make
7 treating those simple infections much more
8 complicated. These organisms are able to
9 survive and flourish in the presence of these
10 antibiotics that would normally kill them, or
11 stop their growth, and infections with
12 antibiotic-resistant bacteria can prolong
13 human illness, increase suffering and increase
14 the risk of death.

15 To compound the problem, each day
16 we use antibiotics more and more resistance
17 develops, while at the same time each year we
18 introduce fewer and fewer new antibiotics.
19 Antibiotic resistance occurs when bacteria
20 acquire genes to give them the ability to
21 resist the power of these drugs. This can
22 happen spontaneously when genes mutate, but

1 more commonly can occur when bacteria share
2 these genes with each other, and as Dr. Morris
3 said, they're very promiscuous.

4 Antibiotic-resistant bacteria is a
5 normal part of the evolution of bacteria.
6 However, the process is accelerated by the use
7 of antibiotics, and greatly accelerated by the
8 inappropriate use of low doses in antibiotics.

9 Antibiotic use promotes the
10 development of resistant bacteria in all
11 venues. This includes hospitals, clinics, the
12 community, animal agriculture and orchards.
13 The environment including orchards is filled
14 with bacteria, and they are able to share this
15 resistance readily with each other.

16 So we must consider resistance
17 that develops anywhere in any of these
18 settings a major public health threat, and of
19 course the prevalence of antibiotic-resistant
20 genes in our environment, the more of those
21 there are, the more likely there are to be
22 resistant bacteria that can make people sick.

1 Tetracyclines are a highly
2 important class of drugs for human medicine,
3 and we must do everything in our power to
4 limit their use so as to prolong their
5 efficacy in treating human illness.

6 The science of antibiotic
7 resistance, again, is not new. In 1945,
8 Alexander Fleming received a Nobel Prize for
9 his discovery of the antibiotic penicillin.
10 In his Nobel address on penicillin, he said,
11 and I'll read it to you:

12 "The time" -- it's better with a
13 Scottish accent -- "The time may come when
14 penicillin can be bought by anyone in shops.
15 Then there is a danger that the ignorant man
16 may easily under-dose himself and by exposing
17 his microbes to non-lethal quantities of the
18 drug, make them resistant."

19 Here is a hypothetical
20 illustration. Mr. X has a sore throat. He
21 buys some penicillin and gives himself not
22 enough to kill the streptococci, but enough to

1 educate them to resist penicillin. He then
2 infects his wife, Mrs. X. She gets pneumonia
3 and is treated with penicillin.

4 As the streptococci are now
5 resistant to penicillin, the treatment fails.
6 Mrs. X dies. Who is primarily responsible for
7 Mrs. X's death? Mr. X, who negligently used
8 penicillin, and changed the nature of the
9 microbe.

10 We all have a responsibility for
11 the development of antibiotic-resistant
12 bacteria. One way consumers should be able to
13 lessen this is by buying organic.

14 Organic food is believed by
15 consumers to be produced without the use of
16 antibiotics, and we need to make sure that the
17 label is consistent and lives up to this
18 expectation. That's why we support the
19 expiration in 2014.

20 CHAIRMAN STONE: Thank you.
21 Harold.

22 MEMBER AUSTIN: First off, I've

1 got a very bad allergy to penicillin, as does
2 my son. It's been probably passed down
3 through our family, not something that we've
4 come into contact with out walking about and
5 stuff. But that's not my question.

6 You kind of made a broad-brush
7 approach, and a referral to the tetracycline
8 in orchards, to the resistance and the amount
9 of bacteria, stuff that is, you know, that's
10 out there, physically out there, that we're
11 going to -- we could build up some resistences
12 and tolerances to.

13 What's that based on? Is it from
14 personal experience?

15 DR. CRUPAIN: It's based on basic
16 science. We know that there's bacteria
17 everywhere. We know from the literature that
18 there's bacteria in orchards. There's lots of
19 studies looking at tetracycline resistance in
20 orchards, or some studies. But there's
21 bacteria everywhere. So we know they're
22 there, and if they're there, they'll become

1 resistant.

2 MEMBER AUSTIN: Okay. But, you
3 know -- okay. Let's just leave it at that.

4 DR. CRUPAIN: We don't ask
5 questions like -- we don't measure the speed
6 of light in the Hilton in Portland compared to
7 the Hilton in Washington, D.C., because of
8 basic science.

9 CHAIRMAN STONE: All right. Thank
10 you very much. Jessica Shade to the podium.
11 Angela Vasquez didn't sign in. Before you
12 start Jessica -- Elizabeth Whelan? Didn't
13 sign in either. Rick Walsh. Rick did. I
14 think Rick is here. Rick on deck, please.
15 Okay. Thank you, Jessica. Go ahead.

16 MS. SHADE: Hi. My name's Jessica
17 Shade, and I'm the Director of Science
18 Programs for the Organic Center. My Ph.D. is
19 from UC-Berkeley in integrative biology. So
20 my comments are from a scientist's
21 perspective, and I agree with the testimony of
22 others here that the use of antibiotics needs

1 to be phased out of organic agriculture.

2 I had the good fortune of being
3 able to visit the field testing sites with Ken
4 Johnson, and it looks like if we can get
5 farmers to adopt the non-antibiotic
6 integrative management systems, the new
7 products, when used in combination, could be
8 as effective, if not more effective, than
9 oxytetracycline at managing fire blight.

10 I come at this from a field
11 biologist's perspective. My dissertation
12 focused on field biology, and as such, I'd
13 like to stress the importance of allowing time
14 for testing in the field and farmer education
15 in the phase-out process.

16 For field testing results to be
17 deemed replicable and trustworthy, the studies
18 need to be carried out over several years.
19 Unfortunately, biological field studies are at
20 the mercy of the environment. So any year
21 with fluke weather patterns or biotic
22 anomalies could give unreplicable results.

1 The work that's been done at
2 Oregon State University is excellent, but
3 farmers aren't going to trust a single year of
4 data. They need more when their livelihoods
5 are at stake, especially since the 2013 season
6 will be the first real scale-up and test under
7 commercial conditions of Blossom Protect, and
8 Previsto hasn't even been registered yet.

9 Additionally, the dissemination of
10 scientific results does not happen
11 instantaneously. The non-antibiotic methods
12 for preventing fire blight require the
13 integration of multiple products to be applied
14 at specific floral stages throughout the
15 growing season, and education and training are
16 going to be crucial for the success of these
17 practices.

18 This is not unique situation.
19 These issues are important for the success of
20 all scientific studies. Too often the step
21 between science and educating the public is
22 ignored, and then you have a situation where

1 the research results aren't getting to the
2 audience that they're targeting.

3 Without taking the time to test
4 the management strategies in the field and
5 educate farmers about the integrated
6 techniques they need to implement to
7 successfully prevent fire blight without the
8 use of antibiotics, these methods will not be
9 adopted and we're in danger of losing organic
10 apple and pear farmers to conventional
11 farming.

12 Our goal is to decrease the use of
13 antibiotics. But if we don't take the time to
14 fully test the new product and educate growers
15 on how to use them, our good intentions may
16 backfire. So thank you so much for listening
17 to me. I know it's been a long day.

18 CHAIRMAN STONE: Thank you,
19 Jessica.

20 Questions? Thank you very much.
21 You're welcome. Rick Walsh to the podium and
22 Marty Mesh on deck.

1 MR. WALSH: Hello. My name's Rick
2 Walsh. I'm a farmer down in Klamath County,
3 about five and a half hours south of here in
4 Southern Oregon, and I'm here today because I
5 want the NOSB to uphold principles of organic
6 production in agriculture.

7 I'm particularly concerned about
8 the allowance of tetracycline for the control
9 of fire blight. If antibiotics are consistent
10 with organic principles, why are they allowed
11 only in apples and pears? Antibiotics are not
12 allowed for my vegetables I grow, not for
13 chickens, cows, pigs or any livestock.

14 I believe that antibiotics should
15 be eliminated from all agricultural, organic
16 agricultural now. My customers support my
17 farm because they do not want food grown with
18 antibiotics or other synthetic material. They
19 question me quite often on this.

20 Consumers who learned about
21 antibiotics are used in organic apples may
22 decide to stop buying organic apples. They

1 may also decide to stop buying organics
2 altogether, because they lose their trust in
3 organic certification. That hurts all of us
4 organic farmers.

5 I was a conventional farmer before
6 I started this. I was growing about 1,000
7 acres of potatoes, hay and grain, and the alar
8 scare come along with the apples. All of a
9 sudden, the apple industry was hurt pretty bad
10 financially, and that tells me there that
11 consumers do care what they have, are getting
12 in their food.

13 Some orchards claim that
14 antibiotics are essential for apple and pear
15 production, but this is not the case.
16 Orchardists in Europe do not use antibiotics
17 on their crops. With so many orchardists can
18 succeed without antibiotics, it is time to
19 require all organic producers to abandon
20 antibiotics.

21 There are cultural controls,
22 natural materials and biological controls

1 available, like the kind that I use in my
2 operation, and this is what organic farmers
3 should be using. Unfortunately, using
4 antibiotics may be simpler, easier and cheaper
5 than prevention.

6 I became an organic farmer partly
7 because I was concerned about the effects of
8 pesticides on human health. I'm also
9 concerned about the effects of antibiotics
10 used on human health. In areas with intense
11 apple production, antibiotics can be sprayed
12 into the air over thousands of acres of
13 orchard.

14 This exposes the farm workers to
15 the antibiotic residue on the trees, and
16 exposes consumers to antibiotics residue in or
17 on the fruit. I do not want to see farmer
18 workers or consumers exposed to antibiotics.
19 I ask you to please reject this petition and
20 take actions to take antibiotics out of this
21 organics.

22 I know that it sounds like I'm in

1 a minority here, as being outside of one
2 saying take it out and not extend it. As
3 being a farmer and an organic farmer, I would
4 say that Mr. Mandley out in the Midwest had a
5 pretty good solution, you know.

6 Take it out of production, take it
7 out of the organic production for a year if
8 they use the product, and that will give the
9 consumer confidence that they're not getting
10 antibiotics in their food supply. Thank you
11 for allowing me this time.

12 CHAIRMAN STONE: Thank you, Rick,
13 for taking, making the effort to drive the 5-
14 1/2 hours to be here, and the Board was
15 listening closely.

16 MR. WALSH: Thank you.

17 CHAIRMAN STONE: Are there
18 questions? Jay.

19 MEMBER FELDMAN: Ditto. Thank you
20 so much for coming. I'm interested in your
21 perspective on the agricultural community,
22 because we're hearing these different points

1 of view, and sometimes I think if you dropped
2 into this room from maybe another planet or
3 even another county, you might think that
4 folks don't get along too good.

5 So I'm wondering what your
6 perspective is in terms of the environmental
7 community overall. Why do we have these
8 differences of opinion on an issue like this,
9 which some people see so clearly on one side,
10 and some people see so clearly? You seem to
11 have a pretty clear vision of how you view the
12 situation.

13 MR. WALSH: In my situation, I
14 take it like the buying organic seed to plant
15 in your farm. When we first started it,
16 buying, you had the option of buying
17 conventional, non-treated and had this, and it
18 was always cheaper. So I kind of did that.

19 Pretty soon, the certifier says,
20 hey, you're not buying much organic, and he
21 says -- and kind of said you need to start
22 buying more organic seed. So I started buying

1 a little more, but it was always in the back
2 of my mind. Boy, it's a lot cheaper to buy
3 this, and then it comes down that you're going
4 to have to buy organics, and we started buying
5 the organic seed.

6 At that time, I started realizing
7 if I were not going to buy the organic seed,
8 that meant that he, the producer out there, is
9 not going to produce it, because there was not
10 a demand.

11 If I bought it and all my other
12 farmers bought it, well, then the price of
13 that seed would come more in line with
14 conventional seed, and then it's there. I'm
15 seeing that now, is that there's more
16 conventional.

17 I think a lot of the tetracycline
18 that they're using, it's an easy way out to
19 me. I don't quite understand it. I don't
20 grow fruit, a lot of fruit. But to me, I know
21 that I've went to a lot of schools and done a
22 lot of workshops on it, and teas, they're

1 talking about using your teas and your
2 preventative programs to control your
3 diseases.

4 I use a lot of that in my
5 production of food now. It's just like if I
6 use a PyGanic, it's the last resort. If I
7 mention I used PyGanic at the farmers market,
8 well, what's that? Well, that's a pesticide
9 and, man, they just back up. So there's a lot
10 needs to be education to the consumer what it
11 is, and that's what we have to do.

12 CHAIRMAN STONE: John.

13 MEMBER FOSTER: What is it that
14 you grow down there?

15 MR. WALSH: Well, we have about 15
16 acres of certified organics, and we're in the
17 high desert. But we are kind of in a certain
18 situation. We have a lot of geothermal, and
19 so we have an acre of certified organic,
20 geothermal heated greenhouses.

21 So we support a CSA year-round.
22 We grow tomatoes and strawberries and herbs

1 and microgreens and broccoli and cauliflower
2 all year long, and support about a 50-member
3 CSA down there. Plus we sell to the co-ops
4 down in Southern Oregon.

5 MEMBER FOSTER: I used to do a
6 bunch of work down there. What town or what
7 city?

8 MR. WALSH: Klamath Falls, Oregon.

9 MEMBER FOSTER: Klamath, okay. K
10 Falls.

11 MR. WALSH: Yeah. 4,200 feet. It
12 snowed two days ago.

13 MEMBER FOSTER: And so did I hear
14 right, no apples or pears right now?

15 MR. WALSH: No. I've just done
16 some research, and I'm thinking about trying
17 to put them into the grow tunnels inside, and
18 put the heat in the ground about 36 inches
19 down, and seeing what would happen there, and
20 what it wouldn't do.

21 MEMBER FOSTER: Oh, cool. Nice.
22 Just one more. How did You hear about the

1 meeting to come, because --

2 MR. WALSH: I'm a member of the
3 Cornucopia Institute, is where I heard about
4 it.

5 MEMBER FOSTER: Thank you so much.

6 MR. WALSH: I enjoy you folks
7 coming down here, at least coming out to the
8 West Coast and giving us an opportunity to
9 speak. It's kind of exciting.

10 MEMBER FOSTER: All right, thank
11 you.

12 CHAIRMAN STONE: Very good. Did a
13 good job as well. Appreciate you making the
14 effort to be here. Last, and certainly not
15 least, Mr. Marty Mesh.

16 MR. MESH: My name is Marty Mesh.
17 I'm the Executive Director of a non-profit,
18 Florida Organic Growers, and the legal name is
19 Florida Certified Organic Growers and
20 Consumers, and I always took very serious my
21 responsibility to balance the needs of being
22 an organic farmer versus obviously my own self

1 and my own family eating organic products, and
2 what consumer expectations were.

3 We operate a certification program
4 called Quality Certification Services,
5 accredited in the original accreditation
6 round, and I started farming organically in
7 1973, after spraying apples in 1972 and the
8 lightbulb going off.

9 A lot of other folks have done
10 really good articulated comments, well
11 written-out, and so you won't hear that from
12 me. But know that I'm the last speaker, so
13 the exit strategy is nearby.

14 You know, I want to support Anne's
15 comments. I heard Anne speak, and a lot of
16 consumer comments as well, and I know that you
17 guys are in a hard position to be in. I
18 didn't want to not support George's
19 aquaculture presentation. It occurred to me
20 that for over -- since the last millennium,
21 I've been up here talking about organic
22 aquaculture. To see George's time line, then

1 you go, wow, it's been that long since the
2 last millennium, was kind of hard to see and
3 hard to know that it's languished for so long.

4 But getting to the apples, the
5 middle suggestion that you all heard was 2016,
6 that middle ground, and then what I was
7 attracted to was the farmer who brought up,
8 really referenced 205.672, the government-
9 mandated spray program section, that says, you
10 know, if you use a material under a
11 government, if you sprayed under a government-
12 mandated spray program, it can't be sold as
13 organic, but you don't lose the certification
14 of it.

15 I believe that the Board could
16 look at that option after 2016, you know,
17 while products are waiting for registration,
18 and look at it and say if the material is
19 used, then you can't sell it as organic,
20 period, and relieve the consumer expectation
21 that the material is not used, and have the
22 farmer take a bit of risk.

1 Then as materials are registered,
2 actually get registration, extension
3 publications are published, growers get the
4 messages from the researchers in 2017-2018,
5 take it, prohibit it totally.

6 So that was -- I was drawn to his
7 suggestion and thought it was worthy of your
8 deliberation and consideration. And with
9 that, we'll get you all out of here early,
10 unless you all have got questions. I saw
11 Jay's light bulbs going off when I was saying
12 something, so I'm sure he's got a question.

13 MEMBER FELDMAN: I'll talk to you
14 later.

15 (Laughter.)

16 CHAIRMAN STONE: Great. All right.
17 Thanks, Marty. I appreciate you being here.

18 MR. MESH: All right.

19 CHAIRMAN STONE: So, Board
20 members, did really good. We ran about 45
21 minutes long, maybe closer to -- yeah, 45.
22 But we did great. I think I appreciate the

1 questions. The audience did a great job of
2 presenting and responding to questions. So a
3 couple of just scheduling.

4 First of all, if there's someone
5 from the Portland area that can direct me to
6 a cigar store. My oldest daughter had a
7 healthy baby boy just about a couple of hours
8 ago.

9 (Applause.)

10 CHAIRMAN STONE: I want to remind
11 everyone that just outside these doors,
12 there's the organic apple and pear tasting,
13 hosted by OTA, OMRI, Oregon Tilth and several
14 others, and a reception in the adjoining room
15 just down the hall.

16 Any Board members have anything we
17 need to bring before we adjourn for the
18 evening or recess for the evening? With that,
19 we will be here promptly at eight o'clock in
20 the morning.

21 (Whereupon, the above-entitled
22 matter went off the record at 6:25 p.m.)

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| abalone 62:19,20 62:21 | absorb 207:20 | accurately 226:16 | 393:1 398:11 | ad 48:12 121:3 130:21 132:6 |
| abandon 361:10 512:19 | absorbed 126:14 209:15 210:7 408:17 | accuse 284:3 | 399:15,20 400:5 400:10 404:12 | Adams 277:22 |
| abandoned 400:12 447:8 | absorption 208:12 | achievable 57:4 | 409:11,12 443:2,2 478:9,13 479:9,10 | adapting 330:15 |
| ability 23:17 70:21 150:22 249:11,12 306:19 353:12 502:20 | abstained 315:7 | achieve 147:19 148:22 | 496:1 512:7 513:12 517:16 | Adaskaveg 317:6 320:21 321:2 324:22 325:7,11 326:7 327:9 329:6 330:6,16 |
| able 18:11 34:22 68:13 80:22 81:8 81:15 88:5 94:14 116:9 123:15 125:10 130:10,19 131:17 137:14 143:6 145:2,7 151:19 168:1 174:13 179:22 184:22 191:12 215:8 231:7 233:18 235:4 245:8 255:17 272:19 300:2,7 301:8 304:10 376:16 438:18 451:5 458:14 468:20 502:8 503:14 505:12 508:3 | abstains 289:20 312:5 | achieved 97:13 279:1 288:22 | acrimonious 169:2 | add 15:7 29:6 39:8 87:6 96:22 108:20 126:20 151:8 206:3 209:17 217:7 289:11 295:22 312:6 430:20 |
| ACA 304:22 | abstention 312:9 | achieving 50:22 | act 13:17 47:8 231:2 308:6,8 332:20 333:6 461:19 462:4 492:11 | added 113:10 117:13 141:3 161:6 301:1 345:19 353:15 |
| Academy 230:13 | abstentions 312:5 | acid 101:15 113:1,2 134:7,11 135:1,2 135:21 136:9 137:13 153:19 154:1 155:10,11 157:21 158:1,2 292:13 313:10 315:3 | action 104:11,19 182:2 312:3 322:6 322:10 326:21 329:1,8 330:10 335:20 336:12 339:11,21 373:11 413:20 432:6,16 493:15 | addenda 311:14 |
| ACAs 304:19 | abuse 183:19 | acids 101:14,20 108:2,6 109:18,22 110:18,20 111:6 112:15 113:8 115:1,3,17 136:19 138:8,21 139:8 142:3,5 144:12 145:6 146:9 147:8 149:1 150:22 152:3,12 155:12 155:20 193:2,13 268:3 | actions 125:16 513:20 | Addie 467:19 477:22 478:2 482:15 485:18 |
| accelerated 503:6,7 | ACA 304:22 | acknowledge 132:1 381:11 385:7 | activated 67:21 210:17 | adding 91:20 112:19 |
| accent 504:13 | Academy 230:13 | acknowledgment 383:4 | active 57:15 178:11 198:22 227:18 267:1,4 408:19 | addition 113:8 117:3 187:6 193:13 216:17 290:8 311:1 313:18 318:13 425:3 |
| accept 37:17,21 385:19 | ACAs 304:19 | acquire 212:16 502:20 | actively 5:9 341:17 | additional 24:16,19 26:14,15 28:22 96:16 105:14 128:9 129:14 132:2,8 187:16 245:16 337:11 415:1 |
| acceptable 307:22 308:2,5 310:2 414:21 | accelerated 503:6,7 | acquisition 211:18 212:12,13 240:18 | activities 7:18 15:15 39:16 384:15 | Additionally 455:3 509:9 |
| acceptably 425:22 | accent 504:13 | acre 210:14 248:21 455:18 517:19 | activity 172:15 173:16 199:11 209:1,16,17,19 263:10 278:22 279:3 312:15,18 323:21,22 328:17 329:13,17,18 409:5 500:1 | additions 10:20 |
| accepted 78:12 202:16 | accept 37:17,21 385:19 | acres 63:7,13 228:5 303:15 359:21 | acts 173:1 | address 25:20 44:19 132:21 206:22 283:8 305:3 436:2 442:14 444:14 |
| access 14:15 16:13 16:20 26:5 30:9 163:8,9 164:2 185:21 186:2,7 194:11 305:18 495:12 | acceptable 307:22 308:2,5 310:2 414:21 | | actual 36:7 37:8 219:4 250:1 289:8 293:19 299:8 300:4 307:10 445:12 480:2 | |
| accommodate 89:5 89:15 | acceptably 425:22 | | acute 213:9 | |
| accompany 289:21 | accepted 78:12 202:16 | | | |
| account 98:14 182:5,8 351:21 382:14 | access 14:15 16:13 16:20 26:5 30:9 163:8,9 164:2 185:21 186:2,7 194:11 305:18 495:12 | | | |
| accountable 34:13 35:8 | accommodate 89:5 89:15 | | | |
| accounted 235:6 | accompany 289:21 | | | |
| accounts 260:7 | account 98:14 182:5,8 351:21 382:14 | | | |
| accreditation 520:5 | accountable 34:13 35:8 | | | |
| accredited 368:16 520:5 | accounted 235:6 | | | |
| accrued 140:14 | accounts 260:7 | | | |
| accumulation 269:15 | accreditation 520:5 | | | |
| accurate 485:16 | accredited 368:16 520:5 | | | |

| | | | | |
|------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 445:15 451:15,18 504:10 | advantage 233:8 233:14 277:12 | 365:12 370:14 441:18 467:20 500:15 | 110:19,21 111:7 307:7 309:16,17 393:17 408:9 491:1 498:18 511:15,16 514:21 | algae 61:17,18 62:1 89:20 90:10,18 101:21 |
| addressed 19:3,17 81:10 443:22 | advantageous 26:4 | Ag 370:10 486:3 | agriculture 1:1,1 170:1 206:6 207:7 207:17 216:4 217:13 218:13,14 227:1 292:2 297:21 309:8,12 351:4,19 371:3 373:19 438:13,14 443:6 480:9 484:2 491:16 494:6 495:3 498:19 499:19 501:18 503:12 508:1 511:6 | algaes 88:9 |
| addresses 24:12 382:19 | adverse 76:14 139:13 337:17,22 338:3 | Agar 280:1 | ahead 12:22 26:1 70:12,19 108:1 131:21 245:17 271:18 283:10 285:14 310:16 316:22 382:1 405:1 434:17 457:15 480:14 507:15 | alive 498:11 |
| addressing 117:21 191:10 382:21 | advertised 346:10 | age 156:6 188:16 424:4 | aid 319:10 333:10 | alleged 30:22 |
| adds 15:17 39:17 438:1 462:7 | advertising 162:19 162:21 346:14 | agencies 11:17 67:15 291:9 292:5 294:12 368:16 501:10 | air 77:12 207:14 220:21 513:12 | allergic 345:6,7,9 345:13 346:1 347:13 |
| adequate 72:22 299:17 403:13 405:10 412:13 489:19 | advice 13:9 398:16 465:14 | agency 47:1 217:17 217:18 218:2 307:21 337:10 | Alab 174:2 280:5 | allergy 347:9 506:1 |
| adequately 25:20 28:14 31:8 338:15 | advise 48:16 436:11 | agency's 216:9 | Alabama 63:8 | Alliance 291:8 |
| adhering 496:4 | advisor 318:5 | agenda 4:10 25:22 29:9,20 107:11 110:10 116:2 133:9 192:12 313:9 437:8,14 | Alaska 387:13 | allow 24:13 26:18 26:19 50:15 65:4 89:2 91:14 108:6 117:9 120:12 291:18 298:4 300:22 323:3 346:21 358:5 367:15 369:5 390:5 394:22 397:6,7 445:18 451:3 457:1 494:4 |
| adjoining 523:14 | advisors 365:14 401:10 | agent 270:19,20,20 478:4 | Agssystem 350:6 | allowance 116:22 173:10 382:22 383:8 452:10 492:15 511:8 |
| adjourn 523:17 | advisory 2:14 15:18 39:18 162:16 218:3 282:6 365:14 370:10 387:4 401:11 425:4 | agents 78:7 203:6 213:5 | ahead 12:22 26:1 70:12,19 108:1 131:21 245:17 271:18 283:10 285:14 310:16 316:22 382:1 405:1 434:17 457:15 480:14 507:15 | allowances 369:10 |
| administer 15:20 39:21 72:1,3,5,13 112:7 | advocacy 297:10 429:19 431:21 | aggressive 4:10 158:9 | aid 319:10 333:10 | allowed 51:13 65:22 71:7 76:1 77:6,15,18 97:10 108:7 122:9 124:18 142:10,11 164:16,19 192:1 222:5 247:13 289:13 298:13 308:3,4 311:20 312:8 318:12 355:15 360:10 366:18 369:6 370:21 371:2 384:11 388:18 393:5 445:9 475:2 481:18 483:18 492:13 511:10,12 |
| administered 111:20 210:2 261:19 | advocate 488:15 499:9 | ago 54:4 71:11 86:18 165:20 234:5 237:2 379:16 399:19 400:4,11 403:7 430:13 469:17 472:21 518:12 523:8 | Albert 46:7 56:16 | allowing 31:1 97:21 133:14 260:10 264:4 |
| administration 71:5 | advocates 488:11 | agree 33:16 112:3,9 188:10 258:16 268:16 300:15 302:22 304:21 353:21 365:2 374:8,9 375:20 423:3 430:9 480:19 507:21 | Albert's 293:11 380:6 454:7,13,20 456:19 | |
| administrative 285:13 | aerating 63:21 | agreeable 115:21 | alert 25:14 | |
| Administrator 2:12 36:4 | Aeration's 63:19 | agreed 21:13 299:22 | alerts 432:16 | |
| admit 497:16 | AFCO 111:21 136:2 137:11 148:4,8,10,17 150:5 151:8 | agrees 366:7 | Alexander 504:8 | |
| admitting 376:12 | Affairs 134:3 | agricultural 108:21 | Alexis 342:8,9 343:7,8,10 347:19 | |
| adopt 363:7 508:5 | affect 200:21 276:6 329:4 375:12 405:6 427:17 428:4 | | | |
| adopted 65:15 141:20 292:3 384:17 510:9 | affirmed 432:3 | | | |
| adopting 401:15 434:22 | afford 389:12 445:3 | | | |
| advance 110:8 131:16 233:20 283:2 308:10 311:15 314:11 | afternoon 4:13,16 110:15 153:10 167:4 194:5 195:5 196:22 281:1 315:21 317:10 331:8 335:13 | | | |
| advancement 48:17 | | | | |
| advances 96:7 | | | | |
| advancing 95:12 | | | | |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 292:9 299:5,6 368:18 388:16 424:22 447:17 508:13 514:11 allows 14:3 61:4 300:20 308:2 346:12 352:13 445:10 446:3 alluded 376:6 almond 324:3 almonds 320:2 alphabetical 11:17 altered 180:4 alternaria 319:21 319:22 320:2 324:1 329:16 alternate 150:11 alternative 198:10 290:6,10 294:2 296:2 303:6 304:20 305:11 338:22 351:5,19 351:20 356:4 364:17 382:20 384:11 385:22 393:5 412:14 481:2 498:7,16 alternatives 198:15 201:9,10 250:3 292:10,15 296:11 323:2 340:14 351:8,12 366:10 367:1,5,17 372:12 375:21 381:21 407:21 411:19 444:5 445:18 455:15 474:21 478:17,21 482:5 492:6 493:11 altogether 393:9 512:2 amazing 46:14 211:22 367:19 amend 289:9 amending 15:6 39:7 395:6 amendment 282:8 | amendments 13:11 America 246:2,6 453:20 American 111:21 230:7 493:9 Americans 47:2 493:1 494:10 amino 108:2,6 109:18,21 110:18 110:20 111:6 112:15 113:1,2,8 115:1,3,17 134:7 134:11 135:1,2,21 136:9,19 137:13 138:7,21 139:8 142:3,4 144:12 145:6 146:9 147:8 149:1 150:22 152:3,11 153:18 154:1 155:10,10 155:12,19 157:21 158:1,2 193:2,13 Amish 159:5 ammonia 159:3,9 189:18 amnesty 447:18 amount 14:11 107:19 120:1,8 122:18 164:3 166:12,12 171:7 213:12 254:20 255:13 269:8 270:21 349:21 399:11 417:13 434:3 461:2 468:11 474:6 481:19 493:2 506:8 amounts 148:20,22 369:10 392:10 458:5 475:10 amplification 240:20 241:12 242:8 261:12 AMS 1:1 amylovora 211:19 212:10 | anadromous 171:14 Anaheim 189:21 analog 154:1 analogy 263:17 analysis 84:17 121:11 210:22 229:20 496:19 analyst 370:15 analytical 410:21 analyze 25:18 390:1 414:12 and/or 7:14 41:12 218:21 242:8 290:6 291:9 323:3 anesthetics 77:13 Angela 507:11 animal 44:2 47:6 59:2 68:18 69:2 70:6 72:13 73:3,5 96:8 100:8 113:15 114:18 134:1 137:19 139:11,15 154:11,11,17 157:5 158:16 159:9 178:15 193:10 206:6 209:22 236:20 239:16 241:22 244:15 503:12 animals 59:19 66:16 67:3 70:22 72:11 75:6,6,7 76:9,13 77:15 87:8,9 89:16 99:6 114:1,2 115:5 116:14 135:5 137:17 145:11 150:2,19 164:15 165:1 166:10,11 166:18 168:22 172:1 210:3 234:2 236:20 237:13 238:1 239:7,8 241:16 242:10 301:16 332:21 333:3 335:22 | 439:9 Anjou 399:21 Anne 485:19 490:12,15 520:15 Anne's 520:14 annotate 489:17 annotation 88:11 88:14 282:9 289:12 305:1 352:8 353:9,15 354:15,21 355:5,9 355:12,17 356:14 358:4 364:15,21 383:14,16 384:17 386:5 434:22 450:15 489:18 annotations 293:3 295:20 304:18 353:14,20 354:4 395:4,7 489:1,2,7 announcement 24:2 announcements 25:5 annual 10:10 15:12 224:1 290:5 299:17 356:3 380:1 470:18 annuals 220:18 anomalies 508:22 answer 121:16 181:2 193:21 244:19 246:21 247:17 251:6 263:20 275:7,8 335:6,8,18 355:8 391:12 435:17 446:14 482:12 483:15 answered 92:19 313:2 answers 195:17 antibiotic 71:11 204:17 205:7 206:2,10 209:19 210:10 212:5,12 214:12,21 215:7 | 215:12,16 220:7 232:10 241:11 255:17 297:6,15 300:4 308:16 312:2 326:6 332:8 332:13,13,16,17 332:20 333:5 347:5 348:19 359:22 360:4 363:8,10 366:6,15 373:5 381:18 386:10 389:18 391:10 393:20 394:13 395:13 400:1 408:8 409:2 409:3 419:4 434:4 443:20 445:10 448:6 479:2,19 480:22 493:16 501:7,14 502:6,19 503:9 504:6,9 513:15 antibiotics 23:9 50:16,17 52:7 67:10 72:1,9,10 72:13,17 99:15 164:15,16,18,19 198:15 201:6 205:8,12,20 206:2 206:13 209:10 211:15 213:5,8 214:1 215:4 231:18 233:7,9,12 236:22 238:13 244:1 253:2 261:19 262:8,9 291:16 294:2,9,22 296:11,15 297:5 298:7,10,16 300:15 301:16 305:14 327:12 344:8,19 345:7,21 346:13,18 347:13 347:16 349:18 354:18 359:12,18 359:20 360:9,13 360:18 361:12,19 |
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| 368:10,12 371:1,5 372:1,2,8,11 373:17,22 374:1,3 374:7 375:6,8,11 381:10 382:22 383:6 390:5 391:17 392:11 394:7,9,17 408:9 408:21 422:13 432:19,21 433:9 433:18 439:8 442:7 444:5,20 445:2 446:4,5,13 447:5,10 448:8 453:8 456:20 458:10 470:3 479:13 480:20 481:4,10,17,19 483:7,13 487:20 491:16 492:1,3,8 492:14 493:17 498:3,8,13,18 501:18,20 502:10 502:16,18 503:7,8 505:16 507:22 510:8,13 511:9,11 511:14,18,21 512:14,16,18,20 513:4,9,11,16,18 513:20 514:10 | anybody's 428:7 441:10 anymore 27:15 34:14 208:18 anyway 41:17 166:5,6 180:22 321:3 403:1 404:17 aphids 496:13 APHIS 130:13 apologize 309:19 310:13 436:18,19 apparatus 64:11 77:1 apparently 139:9 appear 9:14 311:5 408:10 appearance 190:5 489:13 appeared 42:14 44:21 appears 54:5 179:2 202:2 359:18 421:9 applaud 367:3 applause 179:4 523:9 apple 145:15 164:19 196:20 202:2 219:7,10,15 219:17 248:9 254:21 255:1 256:13 257:11 262:7 275:10,11 276:13,13,17,21 282:7 284:21 291:16 294:20 302:12 344:21 359:7 361:5,7 370:18 372:1,6,10 373:5 374:6,21,22 375:22 376:20 377:17,20 379:6 381:4 393:7 398:9 398:14 400:18,19 401:11 403:6 409:11 422:14 | 427:22 431:18 441:19 444:19 453:8,12 454:6 456:21 457:22 478:18 486:15 491:21 498:2 510:10 512:9,14 513:11 523:12 apples 217:11 218:7,21 220:2 247:3,5 257:2 282:13 283:22 287:12 289:15 293:12 294:21 296:13,15 298:8 302:13 303:7,13 343:13 344:9 345:11 346:10 348:9 349:8 355:19 360:9 367:20 371:22 373:22 375:2 380:22 381:3 387:22 388:14 389:10 392:9 393:1 394:1 398:11 399:12,16 404:5,14 406:18 409:8 425:7 454:9 454:11,15,17,19 455:1,3 458:12,15 478:6,10 482:1 484:12 487:16 488:1,4 511:11,21 511:22 512:8 518:14 520:7 521:4 applicable 205:18 232:8 244:17 269:3 315:13 application 208:15 215:16 221:12 222:10,16,19 224:11,12,16 251:1 299:21 301:15 341:4 396:10 415:14,21 | 416:1,11 418:1,5 418:10 423:11 474:2 475:10 applications 242:2 243:20 304:1 416:13 417:12 423:12 applied 74:11 154:9 208:13,21 221:22 222:4 226:17 338:9 340:18 409:22 410:3 416:18 417:9 469:16 487:20 497:11 509:13 applies 79:18 apply 88:13 90:1 222:17 269:8 297:3 337:2 460:4 470:14 applying 89:21 211:15 appointed 10:14 13:8 45:12 78:6 284:15 appointment 48:15 149:11 appreciate 6:21 17:16 42:15 43:3 44:12,18 105:18 106:20 149:21 161:13 191:11 197:20 205:4 217:2 242:21 280:15,17 317:3 321:2 342:3,19 348:9 383:21 392:21 421:16 422:1 436:22 450:12 495:10 499:12 519:13 522:17,22 appreciated 129:17 391:7 474:17 appreciation 149:15 | appreciative 192:2 approach 83:5 132:16 135:15 142:13 157:9 198:20 246:18 260:18 272:4 288:15 292:3 327:18 351:6,21 352:6 373:10 458:19 489:15 496:21 506:7 approached 156:15 approaches 198:10 appropriate 6:21 28:3,6 40:19 41:11 73:2 92:4 123:5 125:17 128:1 132:10,11 132:14 133:4 162:9 301:4 487:7 499:4 appropriately 81:10 approval 268:22 approve 18:4 29:12 175:3 437:20 491:4 approved 55:1,8 59:3 100:5,19 119:5 301:20 318:17 324:16 326:22 339:1 341:12 353:13 402:7 approving 87:19 402:3 approximately 161:5 182:17 235:6 April 1:8 43:7 332:7 407:8 aquaculture 3:13 4:13 43:5,7,12 44:6,7,13,16 45:2 45:10,11,15 46:1 46:3,12,14,15,21 47:16,20,21 48:3 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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| 48:4,9,10,13,15 48:22 49:15,18 53:7 55:17 61:21 63:2 65:19 66:11 66:12 69:7 72:9 73:11 77:5 78:5 88:1,3,15 89:3 93:8 95:14 97:16 102:12 103:14,16 104:4 106:4 107:20 165:19 166:3 167:19 168:12 169:14 170:1,4,8,18 174:18 175:9,16 430:7 436:16,17 437:21 439:11 520:19,22 | 295:15 319:5,6 320:4 405:22 406:1,8,9 513:10 arena 391:6 395:22 argue 494:16 argument 194:1 375:20 497:17 arid 98:10 arisen 37:9 arises 20:2 arising 20:19 30:19 Arkansas 63:8 Arriving 301:6 Arsenault 2:14 11:10 art 95:20 article 348:6,6 articles 162:4 414:14 articulated 520:10 ascertain 24:8 aside 362:8 asked 28:21 47:18 51:14 84:10 100:1 100:3 114:7 196:22 247:10 335:18 360:8 375:9,11 424:8 426:5 464:11 asking 152:1 156:8 158:16 190:12 396:14 428:6 491:3 aspects 78:10 130:9 216:9 365:20 assembling 212:4 assessing 302:7 398:16 assessment 66:7 74:19 85:7,11 98:13 197:17 205:9 472:9 assigned 20:3 assimilated 73:13 79:12 80:7,12 assimilation 79:14 assist 497:7 | assistance 217:5 317:4 Assistant 204:7 associate 36:4 178:13 associated 205:11 393:20 associates 21:7 293:5 453:21 association 45:16 111:21 112:3 141:15 216:21 282:5,7 343:11 441:22 490:21 associations 457:19 assume 164:10 assuming 88:8 123:10 357:11 452:3 assure 374:4 449:17 assures 36:5 astaxanthin 62:6,9 asterisks 439:6 astounding 262:11 Atlanta 229:9 attached 38:1 attack 53:21 405:15 attacks 151:4 399:17 attempt 235:14 attendance 227:7 attention 77:22 134:12,16 138:10 140:4 195:4 280:17 331:14 444:3 attorney 167:16 attracted 63:10 521:7 at-risk 462:15 audience 37:5 98:22 195:12 313:13 343:1 510:2 523:1 audit 82:5 156:12 | auditable 82:2 auditing 81:21 auditor 84:4 August 272:2,7,9 313:12 357:16 auspices 413:7 AUSTIN 1:15 38:21 42:10 152:6 152:13 172:20 184:12,21 185:6 243:10 271:15 272:9 281:16 284:8 286:11 311:17 326:20 334:4 335:9 340:9 357:5 370:6 385:13 391:5 395:21 396:16,22 423:1 424:7 439:20 440:21 441:5 457:15 482:15 505:22 507:2 author 335:16 authored 382:17 authorities 297:8 authority 19:19 353:11 authorized 298:5 automatically 57:21 151:7 317:19 availability 111:11 114:10 136:10 303:17 395:1 412:19 443:15 482:1 available 25:10 26:6 75:21 110:21 144:17 157:12 185:22 193:11,22 199:20 202:7,14 246:10 253:15,20 265:17 270:14 282:17 301:5 303:15 314:7 324:9 369:22 | 371:15 374:6 377:15 381:13 387:16,17 389:3 406:10 411:19 444:6 455:1 468:22 471:15 479:1 483:4 499:11 513:1 Avenue 1:12 average 156:10 190:13,22 409:10 442:22 458:14 avian 178:14 Avogadro's 262:4 avoid 73:18 395:6 439:13 avoided 374:1 awaiting 49:11 awake 434:8 Award 230:7 awarded 230:6 aware 14:17 31:22 43:21 93:16 94:8 104:15 125:3 149:13 169:4,4 181:8 231:16 284:9 319:20 349:17 354:12 449:22 496:15 498:5 awesome 162:10 awful 90:22 Aye 38:12 A-F-T-E-R-N-O-... 195:1 a.m 1:10 4:2 107:6 107:7 194:19 A506 469:14 472:12 473:4,12 474:8 |
| B | | | | |
| B 358:16 babies 157:18 baby 160:11 523:7 back 22:9 29:9,19 43:21 49:3 60:16 | | | | |

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 64:7 69:15 78:6 107:2,9 111:15 114:10 115:22 121:10 124:4 138:15 148:10 160:5 163:10 169:2 177:12 192:21 194:14,15 196:17 198:14 200:12 232:10 258:8 272:1 273:9 285:9 286:18 287:7 290:14 295:9 303:20 315:15 320:11 336:10 342:7,14 343:3 377:9 378:8 399:9 410:18 461:15 476:2 479:4 481:5 483:15 484:3 502:2 516:1 517:9 | 505:12 506:9,16 506:18,21 bacterial 204:18 209:5 214:2 235:2 237:22 238:6,11 257:20 258:1,14 308:17 309:2,10 326:15 373:15 479:15 bacterial-spotted 208:6 bactericidal 326:15 bactericide 273:13 bactericides 200:13 200:18 326:10 bacterium 205:22 266:11 bad 58:7 154:17 206:17 208:20 342:6 360:21 400:7 401:2 406:3 464:19 506:1 512:9 Baden-Mayer 342:8 343:7,9,10 347:20 348:11 349:1,4 bag 51:4 60:14,17 251:19 bags 60:10,20,21 416:3 Bailey 2:16 118:15 126:21 balance 134:4 145:3 147:18,20 148:1,19,22 149:5 171:9 280:22 306:5 350:18 467:2 519:21 balanced 85:5 135:9 138:1 143:6 143:11 145:17 351:21 458:19 balances 90:6 balancing 223:12 461:19 462:4 ball 428:3 | Baltimore 229:15 ban 388:20 442:13 banana 145:15 band-aid 499:17 band-aids 497:12 497:15 bang 359:3 bankrupt 399:19 bar 57:7 bare 100:7,20 158:20,20 barrel 155:14,16 Barry 11:21 93:6 Bart 46:7 Bartlett 399:21 400:11 Bartletts 398:10 base 482:17,17 based 54:6 98:14 105:2 136:4 173:1 173:3 186:22 188:21 192:19 257:7 271:9 287:2 291:20 292:21 293:9 294:11 295:5 320:15 350:21 351:10,16 371:18 389:16 390:3 394:21 452:10 457:4 462:21 473:7 492:4,16,17 500:1 506:13,15 baseline 85:12 111:20 basic 115:4 207:22 232:7 244:16 373:12 497:21 501:13 506:15 507:8 basically 57:15 59:1 70:3 79:19 80:5 83:14 151:11 192:22 235:2 237:3,5 245:4 257:17 281:1 321:8 329:3 | 330:10 basics 232:10 501:19 basis 10:11 18:19 20:6 24:7 28:18 33:1 34:16 70:4 122:6 123:22 144:2 148:5 224:1 235:15 240:7 346:19 451:21 beans 5:10 bear 456:17 beating 92:15 beautiful 156:1 400:6 BECK 1:16 42:2 405:2 becoming 24:16 153:5 240:1 beef 72:15 136:8 beep 22:21 141:9 316:17 bees 5:16 beetle 334:21 beetles 334:17 335:19 began 48:3 169:3 468:15 469:17 begging 434:17 beginning 49:11 67:4 84:18 244:12 245:15 350:11 begins 80:18 417:5 begun 371:7 behalf 141:16 284:16 310:21 331:15 335:14 350:5 357:15 441:21 478:14 494:22 behave 428:22 behavior 73:1 158:8 171:12,18 337:17 behaviors 173:14 beings 57:7 306:19 belief 497:6 | believe 4:20 9:14 17:1 27:21 28:11 29:17 30:11 78:9 86:3 101:17 125:14 133:8 139:17 162:22 163:1,22 165:14 169:5 239:1 246:3 247:13 287:22 334:14 344:4 349:8 359:19 360:12 363:6 367:6 374:20 383:3,19 402:11 408:3 419:16 424:13 428:5 464:10 466:20 491:11,20 492:20 493:9 511:14 521:15 believed 505:14 believes 24:4 27:19 292:7 305:9 309:11 368:5 Bell 65:19 77:5 Belle 43:11 44:12 44:17 45:14 49:13 68:16 79:17 81:18 85:12,20 87:6 90:21 91:17 97:1 99:21 106:7 belong 298:16 benchmark 137:5 140:14 beneficial 71:9 325:5,6 329:5 334:6,16,20 335:4 337:4,18 499:2 beneficials 312:22 330:17 332:3 benefit 23:18 286:1 347:3 423:7 benefits 369:17 Bennel 346:15 benthic 84:22 berms 73:12 75:18 berries 454:10 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|----------------------------------|
| berry 490:16 | binding 210:19 353:17 356:15,17 | biota 84:18 85:1 | 200:18 203:10,14 | 511:9 | |
| best 81:21 82:1 100:17 124:1 131:18 132:17 171:1 203:22 221:7 237:2 273:21 303:1 335:17 380:18 385:21 395:16 413:7 445:1 460:20 462:8 491:15 | bioactive 409:2 | biotech 131:4,6 | 203:18 207:3 211:18 212:8 219:6 222:9 227:18 228:9 246:15,19,22 247:3,7 248:18,22 253:1,12 262:22 263:9 264:10,18 267:8 272:19 273:1,8,22 276:6 276:15 282:13 287:13 289:15 290:7 292:10 294:3,5,9 295:11 296:8 301:21 319:15,22 326:11 340:13 352:13 353:3 355:19 356:1,5 360:20 361:3,4,6,21 362:9,15 363:3,8 366:20 367:16 369:1 370:21 371:7,10,21 381:7 381:14,18 382:8 388:17 389:8,12 393:6 394:1,5,13 395:14 398:22 399:1,11,16 400:8 400:14,15,22 401:2,6 402:17 405:7,16,19 406:3 407:18 411:8,15 414:7 422:20 426:17 427:4 429:1,2 443:18 445:11 449:12 455:14,22 469:17 470:1,6,8,15 471:7,17 473:16 473:16 475:19,21 479:3,11,14 480:15,22 481:7 485:13 488:14 498:3 508:9 509:12 510:7 | biotic 508:21 | BlightBan 469:14 471:2 |
| betrayed 486:14 | bioactivity 209:2 | bird 158:21 189:18 190:22 | 219:6 222:9 227:18 228:9 246:15,19,22 247:3,7 248:18,22 253:1,12 262:22 263:9 264:10,18 267:8 272:19 273:1,8,22 276:6 276:15 282:13 287:13 289:15 290:7 292:10 294:3,5,9 295:11 296:8 301:21 319:15,22 326:11 340:13 352:13 353:3 355:19 356:1,5 360:20 361:3,4,6,21 362:9,15 363:3,8 366:20 367:16 369:1 370:21 371:7,10,21 381:7 381:14,18 382:8 388:17 389:8,12 393:6 394:1,5,13 395:14 398:22 399:1,11,16 400:8 400:14,15,22 401:2,6 402:17 405:7,16,19 406:3 407:18 411:8,15 414:7 422:20 426:17 427:4 429:1,2 443:18 445:11 449:12 455:14,22 469:17 470:1,6,8,15 471:7,17 473:16 473:16 475:19,21 479:3,11,14 480:15,22 481:7 485:13 488:14 498:3 508:9 509:12 510:7 | blights 266:10 | |
| better 45:2 72:14 135:7 151:16 158:1 255:21 273:16,18 274:6 277:9 307:22 323:3 325:10 358:7 409:4 424:17 435:2 443:22 463:20 471:12 477:22 494:21 495:5 504:12 | bioavailability 135:22 136:6 144:4 155:19 | birds 5:12 154:5,13 154:20 155:1,2,8 155:8,22 157:6,17 157:21 158:9,11 158:14 159:11,16 159:16 160:13 179:12 184:6 185:20 187:15 189:6 190:3 | blight-resistant 443:13 445:20 | | |
| betrayed 486:14 | bioavailable 144:13 | bird's 158:8 | blight-tolerant 443:17 | | |
| beyond 21:11 83:21 122:20 273:1 297:14 298:1 481:21 | biocontrol 203:6 | birth 333:15 | blind 151:5 153:5 159:11 | | |
| biased 320:17 | biocumulative 67:20 | bison 136:8 141:14 | blindness 135:3 | | |
| biases 320:15 | biodiversity 81:8 81:15 82:6 83:1 83:13,21 170:14 170:16 171:10 173:15 220:18 225:7 496:6 499:22 | bit 13:4 36:6 44:7 63:17 78:3 79:13 87:18 88:16 111:2 112:1 150:8 161:3 165:22 167:20 189:11 196:9 200:12,15 217:12 218:5 222:16 233:14 246:8 249:10,14 253:22 266:16 274:13 280:19 288:5,6 291:12,14 295:19 341:2 342:6 358:7 398:7 399:1 404:6 414:2 415:13 423:3 453:14 484:15 521:22 | block 446:8 468:2 | | |
| bible 7:21 | biodynamic 486:12 | bird's 158:8 | blocks 367:13 | | |
| biennial 39:12 | biofungicide 323:11 | birth 333:15 | blood 139:19 | | |
| big 63:8 154:10,10 171:10 201:15 288:6 342:21 416:17 429:2 476:19 | biologic 116:15 119:19 | bison 136:8 141:14 | blooded 72:13 | | |
| bigger 62:3 86:15 114:4 276:4,14 438:16 463:11 | biological 54:1 71:18 73:22 204:13,16,20 221:13 251:18 252:5 273:2 274:5 312:14 372:19,22 384:11 407:18 409:5 498:7 499:22 500:1 508:19 512:22 | bit 13:4 36:6 44:7 63:17 78:3 79:13 87:18 88:16 111:2 112:1 150:8 161:3 165:22 167:20 189:11 196:9 200:12,15 217:12 218:5 222:16 233:14 246:8 249:10,14 253:22 266:16 274:13 280:19 288:5,6 291:12,14 295:19 341:2 342:6 358:7 398:7 399:1 404:6 414:2 415:13 423:3 453:14 484:15 521:22 | bloom 199:2,4,5 203:19 214:5 215:4 256:14,15 267:13 268:11 272:21 273:1,5,22 273:22 276:9,15 362:6 369:7 401:9 401:20 403:16,18 405:11,12,16 410:10 411:6 415:20 416:16,22 464:17 465:4 470:21 475:18 | | |
| biggest 63:2 240:2 410:20 | biologically 408:19 | bite 457:22 491:21 | blooming 199:15 201:16,19 237:18 246:8,11 247:11 249:8 251:16 271:18 273:3 275:1,13 276:2 277:8,13 278:8 294:3 303:8 372:14,22 392:12 403:16 404:13 406:15 415:22 417:2 444:11,15 449:1 450:1 458:6 464:22 469:19 470:10 472:4,21 509:7 | | |
| Bill 398:3,7 403:2,4 403:5 404:19,22 405:2 406:21 | biologicals 275:22 375:13 | bites 302:12 492:22 | blooms 348:15 410:14 | | |
| billion 262:5,6 | biologics 71:5 118:14 | bitsy 101:5 | blows 6:1 | | |
| | biologist's 508:11 | bivalve 74:12 | | | |
| | biology 136:15 137:17 166:5 507:19 508:12 | bivalves 49:9 74:15 75:12 | | | |
| | Biomass 73:2 | Blakely 344:18 | | | |
| | biosecurity 70:10 70:14 | blasted 172:21 | | | |
| | biosphere 166:6 | bleeding 77:13 | | | |
| | | blender 336:5 | | | |
| | | blight 198:10,14,21 199:7,12 200:14 | | | |

| | | | | |
|--------------------------|---------------------------|----------------------------|---------------------------|--------------------------|
| blow-up 151:21 | 491:4 514:14 | brains 93:22 | British 59:4 | burdensome 129:8 |
| blueberry 284:22 | 521:15 522:19 | bramble 6:10 | broad 169:9 312:12 | burn 399:4 449:13 |
| Bluebird 290:17 | 523:16 | branch 399:8 | 323:21 325:22 | burned 400:13 |
| board 1:5,10 2:14 | boards 43:16 | brand 36:18 383:3 | 328:12,13,17 | burning 399:11 |
| 10:14 12:13 13:7 | 321:15,15 | break 52:5 107:12 | 329:4 333:18 | burrows 6:12 |
| 13:8,17,22 14:6 | Board's 13:13 | 128:2 192:13 | 499:2 | business 120:1,9 |
| 14:11,13,16 15:2 | 14:20 177:20 | 194:4 281:10 | broad-brush 506:6 | 152:9 170:7 |
| 15:11,18 16:11 | board-certified | 310:3,11 342:7 | broad-scale 359:20 | 184:22 185:1 |
| 17:15 18:21,22 | 229:10 500:22 | 347:13 424:5 | broccoli 518:1 | 350:6 402:13 |
| 20:4 22:2 28:8 | Bob 45:17 | 464:5 | Brock 278:6 | 427:6 478:7 493:8 |
| 29:11,12,19 32:8 | bodies 183:16 | breakdown 207:2 | broiler 187:1 | businesses 187:5 |
| 32:14,22 33:11 | 389:19 | breaks 203:15 | broke 195:5 | 380:12 491:1 |
| 34:15 35:3 39:12 | body 136:15 238:7 | breast 150:17 | broth 206:8 | busy 24:6 243:12 |
| 39:18 41:19 43:17 | 346:22 347:15 | breathing 497:9 | brought 50:9 70:1 | 278:12 428:18 |
| 43:20 44:20 45:8 | body's 240:16 | breathtaking | 102:8 213:6 285:3 | 440:9 474:15 |
| 45:13 47:16,19 | bolt 59:1 | 171:16 | 398:20 424:15 | butyric 313:10 |
| 48:16 68:11 78:4 | Bondera 1:17 7:2,4 | bred 174:12 | 425:10 444:15 | 315:3 |
| 79:5,7 108:5 | 12:21 18:7 22:6 | breed 113:22 114:2 | 478:11 521:7 | buy 163:6 176:9 |
| 115:14,20 133:3 | 32:6 37:14 38:12 | 114:2,3 137:21 | brown 324:13 | 207:11 345:17 |
| 139:3 141:13 | 41:4 92:11 435:22 | 144:10 | brownie 342:16 | 346:8 387:15,16 |
| 154:15 156:8,17 | 436:17 | Brenda 215:22 | Bruce 230:7 | 388:7 390:11,15 |
| 162:16,17 177:5 | Bondura 12:12 | 216:3,18,22 | BT 359:14 | 390:16 404:2 |
| 177:10,13 181:4,7 | bonfire 479:12 | 265:21 268:19 | bubble 426:21 | 516:2,4,7 |
| 182:1 195:13,20 | Book 215:22 216:8 | Brennan 182:12,15 | buffer 75:19 | buyer 425:15 |
| 197:3 198:4 | 217:1 269:4 | Brennen 178:3 | bug 400:21 | buyers 392:7 |
| 216:19 230:16 | books 184:14 | Brian 358:18,19 | bugs 5:16 164:5 | buying 163:4 |
| 231:8 243:3,8 | boots 247:2 | 359:5 363:12,14 | build 6:7 434:15 | 164:11 351:12 |
| 260:10 280:21 | Bosc 400:10 | 364:12 365:6 | 506:11 | 505:13 511:22 |
| 281:8 282:6 | botanical 221:13 | brief 108:8 109:18 | buildings 159:3 | 512:1 515:14,16 |
| 284:15 285:21 | botany 197:7 204:8 | 133:16 281:17 | builds 268:8 | 515:16,20,22,22 |
| 286:2 287:4,7,17 | 204:11 216:5 | 282:1 | build-up 267:5 | 516:4 |
| 290:1,3,8,12 | botrytis 320:7,8 | briefly 7:10 172:22 | built 55:4 226:6 | buys 504:21 |
| 313:15,15 314:10 | 324:13 329:17 | 185:18 206:22 | 240:12 | bypass 28:4,8 |
| 317:12,21 318:4 | bottom 59:18 61:20 | 232:7 436:1 | bulbs 522:11 | 31:18 |
| 318:11 342:15 | 121:1 169:18 | brilliant 127:3,6 | bulk 49:2 | bypassing 31:15 |
| 365:14,16,18 | bought 387:21 | Brines 2:18 109:7 | bulldozed 399:16 | byproducts 95:22 |
| 370:10 384:5 | 504:14 516:11,12 | 109:17 282:1 | bulldozer 479:11 | 96:1 108:19 |
| 387:4 389:21 | bound 154:7,7 | 310:14,17 313:8 | bulldozers 400:5 | 136:18 150:9 |
| 393:10 394:20 | 210:16 279:4,13 | bring 92:17 95:7 | bullet 368:7 | B.A 204:13 216:3 |
| 395:11 398:8 | boundaries 75:18 | 190:8 192:20 | Bullis 45:17 | 229:1 |
| 401:11 407:8 | 479:7 | 231:10 262:12 | Bultedaob 350:2 | B.S 197:12 |
| 411:17 413:4 | bowl 145:12 | 294:18 395:12 | Bultedoab 358:15 | |
| 423:4,16 425:4 | box 140:2 348:1 | 421:17 426:1 | Bultidab 350:2 | C |
| 433:14 435:19 | boxes 484:16,17 | 430:12 448:12,17 | bunch 81:22 91:10 | C 4:1 |
| 436:22 437:7 | boy 516:2 523:7 | 497:3 523:17 | 106:10 460:21 | CAFO 234:6,12,16 |
| 438:7 453:15 | BP 297:11 | bringing 6:15 | 518:6 | 241:22 244:22 |
| 485:22 489:16 | brain 136:20 | brings 6:3 60:11 | burden 34:8 129:3 | cake 51:2 52:21 |

| | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 53:1,3,4 54:10 87:10 cages 51:20 53:9,22 cage-free 187:17 Cal 318:6 calculate 262:4 calculated 158:19 calculations 82:11 Caldwell 358:19,21 359:5 364:1 365:1 365:7 California 21:8 264:16 268:7,7 277:18,20 278:2 282:6 294:13 295:13,15 303:10 317:12 319:5 321:4,10 324:4 326:17 333:20 398:9,12 401:10 401:10,19 402:3 404:12 405:6,22 467:22 468:14 469:10 470:3,6 474:5 485:7 California-based 186:13 California-Davis 133:21 call 4:21 19:6 29:20 55:19 107:9 113:2 159:12,13 173:12 178:7 179:11 195:22 198:20 308:3 316:20 331:13 342:13 378:7 438:13 444:3 468:3 476:3 called 5:5 48:12 51:2 52:8,12 53:7 54:22 58:21 61:14 180:14 199:15 264:6 308:4,4 319:21 358:22 378:12 429:2 487:6 520:4 calling 458:2 | calls 84:11 120:16 127:22 178:6 Calvin 1:23 9:7 12:22 38:2 98:19 157:1 178:1 184:4 448:11 camera 60:6 cameras 57:16 Canada 174:19 387:14 453:19 455:2 Canadian 422:19 Canadians 422:13 cancer 259:21 333:15 candidate 62:10 canisters 64:8 canned 146:10,17 146:21 canopy 208:4 cap 191:1 capabilities 35:15 209:9 238:5 capability 213:12 226:13 capacity 58:8 67:17 80:13 capricious 332:16 capture 46:12 80:2 98:5 306:2 car 162:6 carbon 67:21 77:9 153:20 carbon-based 325:16 card 461:13 cardiologists 138:11 care 68:18 116:14 264:6 347:2 359:17 426:15 512:11 carefully 91:12 320:18 489:17 492:9 Carmela 1:16 404:22 | carnitine 112:22 carnivorous 168:12 175:9 Carolina 188:2 303:12 347:12 380:9 Carr 386:17,18 392:15,18,19 396:13,21 397:12 carrageenan 164:7 carried 290:11 296:1 383:18 508:18 carrots 319:16,22 carry 233:15,19 235:8 388:11 497:19 carrying 58:8 80:13 Carter 133:11 141:10,13 146:11 147:1,4,13 148:21 carton 163:17 cartons 163:4 CAS 315:4 cascading 59:21 case 25:19 64:10,20 68:11 75:6 80:9 80:10,16 87:7 99:5 122:6,6 138:22 172:3 173:10 193:15 206:1 338:12 351:13 357:1 366:20 373:2 429:7 446:5 452:2 458:9 483:4 496:19 512:15 cases 20:22 29:17 30:7 70:18 73:8 137:22 206:7 210:8,9 213:6 308:20 387:22,22 399:18 475:19 case-by-case 123:22 cat 111:5 113:9,11 | 113:13 139:7 Catalano 358:19 365:9,12 catastrophic 444:14 catch 263:17 categories 83:19 375:13 category 142:6,13 142:21 293:14 450:19 454:7,18 454:20 caterpillars 5:14 catfish 46:5 56:10 63:1,1,7,7,9,15,15 63:16,22 77:8 175:11 Cathy 60:7 cats 113:7 134:12 134:19 142:17 151:4 153:5 155:9 cattle 31:2 cauliflower 518:1 cause 170:19 180:17 238:16 253:15 255:17 256:3 257:9 333:15 337:4 462:19 479:3 caused 180:15 causes 77:10 479:4 493:15 Celestial 21:7 cell 134:1 335:21 335:22,22 336:1 cells 238:6,7 center 118:14 167:16 218:13 230:22 347:14 430:9 500:20 507:18 centered 442:1 centers 229:8 231:1 Centigrade 330:4 centimeter 210:15 central 16:10 201:18 216:11 | 266:3 359:8 414:7 centralist 291:3 295:16 centrist 295:18 350:8 355:9,10 363:5 364:13 382:17 435:1 certain 40:18 96:11 110:20 119:13 122:18 131:15 140:3 150:16,18 181:7 269:8 319:13 320:4 322:14 328:14 345:2 349:21 444:20 447:12 452:11 481:2 517:17 certainly 74:16 84:14 96:7 121:7 124:12 125:4 134:10 136:20 196:6,6,8 345:10 448:16 483:5 519:14 certification 61:7 105:11 202:22 216:9 217:3,15,16 217:18 220:4 224:9,17 268:22 369:4 382:5 388:19 393:9 394:6 451:4 486:1 486:5 489:5 512:3 520:3,4 521:13 certified 47:13 50:8 50:14 53:5 65:2 85:21 91:15 102:22 103:1,10 103:16 104:12,17 108:20 143:22 172:17 186:2 218:15,19,21 219:7,22 220:2 224:2 319:14 359:7 376:2 387:10 396:5,7 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-----------------------------|-------------------|---------------------------|----------------------------|-----------------------------|
| 441:19 464:19 | 110:13 133:7 | 474:11 477:9,17 | channel 36:2 | Chino 186:12 |
| 468:5 486:9 | 139:2 140:19 | 477:21 482:13 | chaotic 136:14 | chitin 329:2,18 |
| 490:18 517:16,19 | 141:12 146:6 | 484:8 485:18 | characteristics | 334:13 335:3 |
| 519:19 | 147:3 149:12 | 490:9 495:9 500:7 | 323:19 | 336:13 |
| certifier 118:21 | 152:4 153:7 | 500:12 505:20 | Charlie's 380:7 | chitinase 329:11,20 |
| 156:11 283:19 | 156:21 159:1,20 | 507:9 510:18 | 386:20,22 387:7 | chitinases 329:9 |
| 515:19 | 161:10,14 165:16 | 514:12,17 517:12 | chart 170:9 411:14 | chlorine 99:9,10 |
| certifiers 117:15,22 | 166:19 167:2,6,10 | 519:12 522:16,19 | 466:21 | choice 221:6 |
| 189:22 190:2,19 | 172:18 173:18 | 523:10 | cheaper 163:6 | 240:10 362:15 |
| 290:3 296:1 | 174:22 176:5 | Chairperson 1:12 | 513:4 515:18 | 368:21 395:12 |
| 299:18 354:17 | 177:3 178:1 181:3 | 1:15 | 516:2 | 455:16 |
| 364:16 383:17 | 181:20 182:11 | chalkboard 485:5 | cheat 442:20 | cholera 270:22,22 |
| 489:8 490:5 497:8 | 184:3,11 185:7,18 | challenge 117:14 | check 273:10 | choose 185:1 |
| certifies 393:1 | 186:8,14 191:5 | 121:9 149:9 490:6 | 280:20 305:17 | 346:21 369:2 |
| certify 173:7 | 192:3,5,17 193:4 | challenged 287:5 | 404:16 | 430:1 481:10 |
| 190:20 219:21 | 194:2 195:3 | 302:16 | checkboxes 223:8 | choosing 91:3 |
| 283:20 | 229:12 243:9 | challenges 55:16 | checked 132:15 | 494:10 |
| certifying 368:16 | 280:16 285:15 | 74:14 367:22 | 404:12 | chose 179:11 287:2 |
| cetera 114:2 | 315:17 320:19 | 438:16 | checks 90:6 | chosen 411:21 |
| 115:10 488:13 | 324:18 326:19 | champion 489:15 | chelated 150:11 | Christiano 208:3 |
| CF 293:15 398:18 | 328:20 331:6 | chance 115:19 | chemical 66:18 | Christopher 46:6 |
| CFS 291:1 297:11 | 334:2 335:10 | 145:8,9 204:4 | 74:1 207:12 252:7 | chronic 213:7 |
| chain 220:1 306:18 | 338:17 340:8 | 255:22 274:7 | 269:20 274:5 | chronology 47:14 |
| 306:18 416:3 | 342:2,5,13 347:18 | 305:21 402:22 | 384:12 389:1 | cigar 523:6 |
| chainsaw 476:22 | 348:3 349:22 | 405:19 | chemicals 74:4 | circle 51:2 |
| chair 7:7 10:7 | 355:2 357:4 | chances 145:10 | 75:10 207:12 | circumstances |
| 11:22 12:11,13 | 358:14 363:12 | 360:4 | 458:10 | 262:21 345:8 |
| 39:3 44:15 46:10 | 364:9 365:6,9 | Chandler 279:21 | chemistry 250:20 | citation 176:10 |
| 149:14 192:9 | 370:3,11 374:11 | change 12:2 28:3 | 280:11 | citations 279:18 |
| 315:15 317:13 | 375:17 378:10,14 | 85:3 103:9 122:2 | chemotherapy | cite 139:7 143:10 |
| 365:18 | 379:8,11 384:1 | 151:18 190:10,13 | 259:22 | cited 415:15 |
| chaired 48:7 | 385:4 386:15 | 210:12 214:20 | cherries 342:1 | cities 171:4 |
| chairman 4:3 6:20 | 390:7 391:4 | 253:6 314:18 | 397:20 | citing 279:18 |
| 22:9,11 23:1 27:3 | 392:13,15 395:19 | 354:5 435:2 | cherry 284:22 | citizen 23:5 27:11 |
| 27:6 31:11 32:2,3 | 398:2 403:2 | changed 11:20 | chick 160:11 | 190:17 |
| 32:13 33:15 35:10 | 404:19 406:21 | 37:10 94:6 97:4 | chicken 144:2 | citizens 493:7 |
| 36:14,17 37:4,16 | 411:22 415:11 | 214:8 267:7 | 147:16 | city 518:7 |
| 38:4,7,10 39:3 | 418:16 422:10,21 | 287:22 473:7 | chickens 153:15 | claim 30:18 302:11 |
| 40:6,10,13 41:2 | 424:19 427:12 | 505:8 | 156:5 164:1 | 512:13 |
| 41:18,21 42:14 | 428:11 429:13 | changes 9:22 10:18 | 178:18,19 180:12 | claims 47:12 |
| 43:2,12 77:20 | 434:19 435:21 | 10:19 11:3,3,22 | 180:13,17 237:5 | 104:12,16 |
| 78:1 85:15 87:16 | 438:5 439:18 | 12:1,15 29:7 | 511:13 | clarification 7:14 |
| 92:10 98:19 101:4 | 441:14 446:15 | 84:22 94:16 105:3 | children 346:8,9 | 30:8,11,17 193:16 |
| 102:6 104:20 | 448:11,18 450:9 | 279:7,9 287:6 | 458:15,16 | 219:2 341:2,7 |
| 105:16 106:17,21 | 452:19,22 457:13 | 396:1 489:9 497:2 | Chile 398:17 485:2 | 417:8 |
| 107:8 108:4 109:1 | 459:2,6 467:11,14 | changing 10:19 | chill 401:19 405:10 | clarifications 20:10 |
| 109:4,8,12,15 | 467:18 471:22 | 180:10 302:17 | chimera 119:14 | clarify 20:15,18,21 |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 84:15 102:8 146:19 172:22 269:1 440:22 clarity 30:19 417:8 class 52:8 504:2 classified 312:1 classify 312:4 315:1 clay 206:4 248:8,16 clean 206:19 clear 118:19 119:16 168:10 172:1 173:6 175:6 215:15 256:18,22 258:13 347:15 365:3 383:4 407:15 456:14 465:6 515:11 clearance 76:19 clearly 232:22 237:11 261:10 271:1 301:13 304:15 351:19 385:7 485:2 515:9 515:10 clients 217:19 347:4 climate 228:6 294:4 406:5 462:19 climates 201:17 202:1 climatic 276:5 clinical 69:5 133:20 133:22 239:21 240:4 257:8 306:21 clinically 72:2 clinician 231:21 239:22 clinics 503:11 clock 5:17 195:19 close 165:1 252:16 309:6 378:3 389:5 401:7 closed 31:6 88:9 125:15 168:16 | 175:10 177:16 431:11 closely 48:18 105:22 106:3 514:15 closer 247:17 395:12 417:16,17 522:21 closest 252:14 closing 104:22 105:17,19 cluster 239:1 coalition 291:6 357:15 379:21 382:13 454:2,3 coalitions 169:9 coast 61:6 62:17 171:3 361:3,9 496:20 519:8 coastal 295:15 404:3 468:1 cockroaches 336:3 336:4 code 344:13 codes 119:20 codling 468:18 cognizant 97:6 coincidental 328:1 Coke 11:8 cold 72:12 189:6 496:12 cold-blooded 72:11 Colehour 1:17 7:1 9:9,11,19 12:7,11 18:16 36:21 37:12 38:11 41:3 92:10 95:11 435:21 Coleman 365:10 370:12,14,15 374:18 376:19,22 378:20 379:9 coli 212:9,11 234:17 239:6,9 coliforms 237:7 collaborate 384:6 collaboration 8:2 19:7 20:16 21:17 | 21:20 127:19 128:12 130:5,14 collaborative 127:8 490:2 colleague 44:17 487:2 colleagues 70:19 138:5 139:17 247:17 collected 206:16 234:15 collective 128:18 Collectively 381:2 College 216:4 230:8 colonize 473:15 color 5:7 463:20 Colorado 204:12 colorful 463:12 column 83:8 462:6 462:6 columns 462:5 combination 85:1 214:20 226:18 444:16 462:18 470:11 508:7 combine 146:20 combined 146:9 380:1 478:9 combines 470:11 come 46:21 47:21 60:16 68:12 78:13 106:7,8,9 107:2 115:21 121:16,21 123:14 125:6 126:11 127:2 132:10 142:8 161:4 167:5 189:22 191:20,21 194:14,15 232:10 243:12 244:12 256:12 259:3 264:20 287:7 306:13 316:22 320:13,22 340:16 378:18 379:3 410:18 428:19 | 431:20 432:5 435:18 456:1 473:19 474:16 501:4 504:13 506:4 508:10 512:8 516:13 519:1 comes 5:15 6:19 60:11 81:16 138:10 143:19,21 156:11 162:1,7 172:15 177:19 199:17 240:8 475:15 481:8 516:3 comfort 27:13 460:4 comfortable 452:1 452:3 Comice 399:21 462:14 465:1 coming 5:6 14:11 36:19 53:15 54:2 57:18,19 74:17 80:7,11 81:1 90:14 181:15 191:13 217:9 242:21 245:15 256:7 264:4 265:13 271:20 280:17 331:3 381:17 405:17 453:2 457:20 462:18 474:13 476:20 514:20 519:7,7 commensal 238:11 238:20 239:13,18 241:9,10,15 308:17 comment 3:11,17 3:22 12:8 14:4 15:12,14 16:6 17:1 18:12 22:12 23:7 25:3,7 33:21 39:13,15 41:5 88:16 92:21 | 102:15 105:19 107:13 110:9 111:14 112:13,14 113:17 114:20 122:14 129:17 131:21 132:1 133:2,9,14 134:6 172:20 173:3 181:6,22 186:20 192:10 280:8 283:3 296:20 298:7 311:15 314:12 315:21 340:11,22 344:13 383:21 425:1 439:21 457:7 486:17 487:1,7 488:22 commented 124:6 commenters 21:13 316:7 353:19 commenting 26:21 350:5 comments 8:16 9:1 9:12,21 12:18,19 16:8,16,17 17:9 21:2,6,10,13 24:18,22 25:9 27:2 28:22 41:19 77:18 93:13 102:18 105:18 113:18 114:12 115:2,20 122:21 123:9,19 124:8,15 144:14 147:18 175:8 181:19 186:17 218:19 281:10 290:14 291:14 294:20 297:22 298:15,19 340:21 344:15 345:4,5 347:17 349:10 356:13 390:10 407:10 434:11 444:1 507:20 520:10,15 520:16 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Comment/Crops 317:9 | commonly 270:11 359:15 447:2,14 503:1 | 187:15 200:5 202:14 207:12 251:3 274:6 | 224:18,21 226:12 487:9 488:2 | 338:11 |
| Comment/Livest... 133:12 | commons 393:17 | 284:17,20 291:6 | Compliant 487:11 | concept 16:9 34:9 36:1 129:1 239:12 322:8 461:18 |
| Comment/Policy 22:10 | communicate 13:14 15:2 17:21 23:17 191:11 489:12 | 310:22 341:22 379:16 386:3 387:8 480:18 | complicated 116:7 118:18 121:18 125:21 127:14 389:22 432:18 491:17 492:21 494:7 502:8 | concepts 122:11 232:7 244:16 |
| commerce 112:5 | communication 14:6 15:1,9 16:11 17:3,14,20 23:15 25:13 39:6,10 489:8 | compare 85:13 | complications 446:2 | concern 15:3 17:22 31:19 33:20 34:10 124:22 154:18 178:21 184:1 205:19 238:9,18 238:19 239:12 240:17,19 242:4 244:14 249:22 255:15 258:19 261:14 277:6 321:3 323:6 341:1 361:7 389:15 408:7 442:7 445:6 448:7 450:15 |
| commercial 44:6 138:14 151:8 178:18 294:22 315:12 382:3 395:1 443:1,15 509:7 | communications 8:12,21 13:2,5 15:11,21 16:13,18 17:11,17 23:14 32:15,19 36:2,13 37:19 39:12,22 | compared 76:7 136:2 296:13 507:6 | complies 76:2 | concerned 23:8 24:21 90:3 237:16 237:19 250:5 259:6 276:20 285:11 323:4 375:6 381:22 385:8 403:18 426:12 454:5 468:8 511:7 513:7 513:9 |
| commercially 367:17 381:13 384:21 479:1 | communities 214:2 237:22 293:21 456:17 480:4 491:10 494:3,15 495:1 | comparison 140:1 | comply 226:13 347:9 376:16 | concerning 13:9 364:15 442:6 497:18 |
| Commission 398:9 401:11 | community 13:15 13:21 14:1 16:14 16:21 20:13,20 23:19 24:15 25:6 26:19 30:18 47:21 48:2,3 68:22 69:1 69:4 210:12 217:6 251:14 254:1 271:7 288:4 300:15 380:13 382:16 383:6 385:7 413:6 442:8 458:22 459:1 480:18 483:21 503:12 514:21 515:7 | compet 233:18 481:15 | component 153:19 222:5 328:18 | concerns 28:17 36:9 114:4 129:14 183:18 236:11 244:16 300:11 312:13,21 322:13 327:9 351:22 358:11 382:15,21 391:12 443:11 |
| commit 366:8 387:18 | communities 214:2 237:22 293:21 456:17 480:4 491:10 494:3,15 495:1 | competing 50:7,10 50:13 59:10 201:2 | components 102:5 279:2 | concluded 338:10 |
| commitment 367:9 383:7 443:6 495:2 495:4,7 | communities 214:2 237:22 293:21 456:17 480:4 491:10 494:3,15 495:1 | competition 63:6 174:3,7 | composition 279:7 | concludes 131:19 192:9 194:3 487:15 |
| committed 20:3 151:21 290:2 291:15 300:16 385:9 386:13 443:3 453:7 456:20 494:20 | community 13:15 13:21 14:1 16:14 16:21 20:13,20 23:19 24:15 25:6 26:19 30:18 47:21 48:2,3 68:22 69:1 69:4 210:12 217:6 251:14 254:1 271:7 288:4 300:15 380:13 382:16 383:6 385:7 413:6 442:8 458:22 459:1 480:18 483:21 503:12 514:21 515:7 | complaint 104:18 | compost 76:1 80:2 | |
| committee 4:14 11:13 12:7,11 20:2 28:21 79:1,4 99:2 107:3 111:1 111:15 112:10 121:4 126:15 130:21 132:5,6 186:15 192:18 194:16 285:16 287:4 304:17 312:3 356:17 | community 13:15 13:21 14:1 16:14 16:21 20:13,20 23:19 24:15 25:6 26:19 30:18 47:21 48:2,3 68:22 69:1 69:4 210:12 217:6 251:14 254:1 271:7 288:4 300:15 380:13 382:16 383:6 385:7 413:6 442:8 458:22 459:1 480:18 483:21 503:12 514:21 515:7 | complete 114:22 135:9,10 138:1 143:6,11 145:17 150:14 370:8 | composting 223:12 | |
| committees 11:4 106:1 230:13 | community 13:15 13:21 14:1 16:14 16:21 20:13,20 23:19 24:15 25:6 26:19 30:18 47:21 48:2,3 68:22 69:1 69:4 210:12 217:6 251:14 254:1 271:7 288:4 300:15 380:13 382:16 383:6 385:7 413:6 442:8 458:22 459:1 480:18 483:21 503:12 514:21 515:7 | completed 49:9 110:6 156:4 282:19 299:3 414:11 415:2 | compound 208:8 208:10 209:2 279:13 502:15 | |
| commodities 321:10 | community 13:15 13:21 14:1 16:14 16:21 20:13,20 23:19 24:15 25:6 26:19 30:18 47:21 48:2,3 68:22 69:1 69:4 210:12 217:6 251:14 254:1 271:7 288:4 300:15 380:13 382:16 383:6 385:7 413:6 442:8 458:22 459:1 480:18 483:21 503:12 514:21 515:7 | completely 60:18 96:5 191:19 255:11 349:15 352:22 399:22 453:6 | comprehend 368:1 | |
| common 65:17 295:6 410:11 442:14 449:6 | community 13:15 13:21 14:1 16:14 16:21 20:13,20 23:19 24:15 25:6 26:19 30:18 47:21 48:2,3 68:22 69:1 69:4 210:12 217:6 251:14 254:1 271:7 288:4 300:15 380:13 382:16 383:6 385:7 413:6 442:8 458:22 459:1 480:18 483:21 503:12 514:21 515:7 | completion 299:6 | comprehensive 48:21 85:10 98:18 | |
| | companies 143:11 143:14 323:13 389:2 398:13 433:13 | complex 74:13 120:18 121:9 127:14 137:3 179:5 287:20 288:6,16 306:11 306:13 461:7 | compressed 98:8 | |
| | companion 223:11 | complexity 118:6 128:10 181:9 368:1 | comprised 379:22 | |
| | company 27:13 54:22 139:9 150:4 | compliance 219:11 | compromise 291:21 293:10 300:19 305:10 358:10 413:11 446:9 457:5 | |
| | | | compromised 114:18 | |
| | | | compromising 143:2 295:4 | |
| | | | computer 445:12 | |
| | | | computers 194:12 | |
| | | | concentration 90:5 136:19 | |
| | | | concentrations 239:4 278:22 | |

| | | | | |
|----------------------------------------------|--------------------------------------------|---------------------------------------------|--------------------------------------|----------------------------------------------|
| conclusion 189:4 294:19 487:22 | 285:18 486:18 | 330:6,17 395:2 467:6 501:5 | 217:21 297:2,11 302:1 305:6,12 | contemplate 90:10 |
| conclusions 94:8 293:1 395:1 487:3 | confluence 306:14 | considering 21:9 21:12 27:2 104:6 | 343:11,11,20 344:20 345:2,5 | contemplated 90:9 |
| concussion 76:22 | confusion 386:17 468:16 | 283:21 | 349:14 351:12 | contemplating 90:19 |
| condense 9:18 | Congratulations 149:10 | consistency 122:18 297:3 315:12 | 354:11,16 356:21 | content 7:19 34:4 136:9 |
| condensed 9:19 | conical 59:18 | consistent 47:8 108:18 137:19 | 357:9 358:3,7,11 | contentious 352:20 |
| conditionally 134:20 135:1 | Conn 310:21 | 222:12 388:9 | 360:9 363:9 | context 270:1,3 307:1 |
| conditions 72:21 76:11 208:1 222:1 | 320:20 331:7,8,9 | 392:8 505:17 | 365:22 367:18 | continual 31:1 |
| 225:6 227:20 | 331:10,14 335:5 | 511:9 | 368:5 370:1 374:8 | continually 221:5 |
| 366:21 367:2 | 335:15 | consistently 478:17 | 374:8 382:21 | continue 68:13 103:8 104:13 |
| 378:4 405:6 | connections 5:18 6:6 | consists 12:7 45:13 | 385:17 386:8 | 106:5 123:4 126:4 |
| 444:12 447:12 | Connor 22:14 27:7 27:8,9 31:20 | conspiracy 484:1 | 392:2 395:17 | 130:20 184:17,22 |
| 451:12,15,16,18 | consensus 33:12 123:1 | constant 493:6 | 432:2,11 433:7,18 | 185:1 231:12 |
| 452:11 471:7,19 | consequence 61:5 170:6 | constituents 435:3 | 435:5 438:11 | 303:3 316:19 |
| 472:15 473:8 | consequences 395:9 | constitutes 120:17 286:3 | 440:4,5,19 443:4 | 367:17 368:3 |
| 479:17 481:9 | consequently 245:6 271:6 | constraints 322:20 | 445:7 457:10,17 | 369:20,22 394:15 |
| 509:7 | conservative 93:19 | constructed 97:9 | 458:1,1,19 482:2 | 397:8 438:19 495:6 |
| conducted 117:5 256:17 296:18 | conserve 170:15 173:15 | consultant 141:15 464:19 | 482:10,20 491:8 | continued 294:13 296:17 297:14 |
| 372:3 381:1 | conserving 171:10 | consultants 225:15 | 491:13 492:2,21 | 298:14 306:3 |
| 412:11 444:9 | consider 30:1 66:13 76:11 | Consulting 350:6 | 493:20 500:17 | 352:2 360:12 |
| conducting 401:13 | 123:12 193:9 | consume 60:12 | 505:12,15 511:20 | 369:16 494:5 |
| conference 47:22 84:11 120:16 | 292:11,21 296:6 | consumed 64:15 | 512:11 513:16,18 | continues 128:17 469:10 |
| 194:10 399:21 | 317:18 320:14,18 | consumer 169:11 217:10 300:12 | 519:20 | 47:3 95:15 164:9 |
| conferences 227:8 | 394:20 395:11 | 302:4 343:14 | consumes 368:11 | 189:14 380:20 |
| confidence 267:17 300:12 352:8 | 414:5 499:1 | 355:14 356:13 | consuming 82:15 448:8 | consumption 46:20 47:3 95:15 164:9 |
| 383:3 385:11 | 503:16 | 357:9,18 358:1,6 | 448:8 | 189:14 380:20 |
| 514:9 | considerable 120:8 | 365:17 368:4 | contact 20:13 191:15 259:3 | contact 20:13 191:15 259:3 |
| confident 202:20 266:20 | 429:18 431:19,21 | 383:2 385:11 | 398:20 506:4 | contacts 20:19 |
| confidential 120:1 120:9 | 432:13 434:1 | 393:15 428:8 | contain 347:5 | contained 175:11 |
| confirm 285:16 | 440:1 448:7 456:9 | 429:18 431:19,21 | containment 72:21 79:21 | contains 157:13 422:7 |
| confirmation 225:15 | 457:19 458:14 | 432:13 434:1 | contaminants 75:9 | contaminated 153:1 205:21 |
| confirmed 219:5 222:8,8 | 459:1 464:8 466:2 | 440:1 448:7 456:9 | contaminated 153:1 205:21 | 206:18 210:6 |
| confirms 177:1 | 466:5,6 467:8 | 457:19 458:14 | 257:11 | contamination 75:20 323:3 409:3 |
| conflict 36:21 283:12 284:3,11 | 477:4 522:8 | 459:1 464:8 466:2 | | |
| 285:6,6,10 286:3 | considerations 351:11 | 482:17 486:13,20 | | |
| conflicts 283:8 | considered 42:21 44:9 95:5 122:3 | 491:14 493:13 | | |
| | 123:20 124:16 | 500:17 501:9 | | |
| | 129:16 130:2 | 514:9 517:10 | | |
| | | 520:2,16 521:20 | | |
| | | consumers 135:19 | | |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| control 70:21 71:19 73:21 75:10 92:2 111:22 112:4 198:10 199:12 200:14,18 204:16 204:20 221:22 223:20 227:10 229:8,21 239:9 246:15,19,22 247:3 248:11,18 249:1 253:1 267:8 272:19 276:6 282:12,13 287:13 289:14,15 292:10 294:3,9 311:3 319:2 324:8 326:11 330:12 333:18 336:7 339:16,17 340:1,3 341:22 354:8 355:19 356:1 362:6 368:21 370:22 371:7 373:1,4 381:18 388:17 394:1 400:15 401:7,12 405:7 409:3 411:16 414:7,9 427:3 429:5 470:15 477:1 485:13 488:16 498:3 511:8 517:2 | controversies 435:9 controversy 254:1 convened 1:10 142:18 convenience 293:18 480:1 conventional 31:2 45:10 52:16,20 59:8 65:3 73:20 73:20 85:17 86:10 95:13 143:14,21 177:18 225:18 267:7 284:21 292:4 294:16 295:9 308:11 324:1 351:5,9 360:17 373:18 389:1 394:2,3 396:11,12,19 397:3,11 399:15 420:18 427:5 438:14 455:16 456:2 458:8,11 468:7 469:3,9 481:5,15,16 482:6 510:10 512:5 515:17 516:14,16 conventionally 427:1 conversation 4:15 35:11 37:10 196:8 283:5 342:21 432:13,14 434:1 conversations 115:16 247:1 357:13 391:13,15 432:4 437:15 482:16 conversion 74:8,10 82:12 convert 455:16 456:2 converted 54:14 convey 489:9 convinced 371:21 Coody 343:7 350:1 | 350:4,5 355:7 357:14 382:18 cool 266:15 518:21 Coop 290:17 cooperative 123:20 124:6 468:14 490:2 coordinate 384:6 coordinated 410:8 coordinating 131:4 131:5 coordination 486:3 coordinators 486:2 copied 99:19 copies 347:21 359:1 copper 90:3 137:13 200:4,6,9,13,17 201:21,22 202:4 202:13 203:20 249:11,13 250:13 250:16 252:8 264:15 267:20 268:21 269:7,12 271:20 272:18 273:17 303:17 318:20 319:4,6,9 319:11 322:2,15 327:14 362:3 372:18 399:4 403:19 406:11,13 449:1,6,20 470:11 473:20,20 474:2 488:13 coppers 247:12,18 273:19 327:4 copper-based 246:9 copy 79:3 176:19 372:4 core 478:7 493:21 corn 63:5 101:12 157:11 187:14 Cornell 359:11 corner 408:17 cornerstone 380:19 Cornucopia 21:11 | 23:4,12 24:4,19 24:21 27:10,19 28:22 29:22 122:20 167:8 296:5 297:12 370:16 372:4 374:20 378:22 379:4 447:4 519:3 Cornucopia's 27:2 296:3 correct 33:13 154:16 177:1 255:11 329:7 350:2 371:8 409:14 418:11 419:14 485:9 500:13 correctly 459:10 correlation 256:22 417:22 418:13 Corvallis 197:9 cosmetic 200:20 332:20 333:6 cost 63:5 470:2 costs 105:3,14 393:12 Cougar 464:18 Council 111:19 counsel 13:9 count 34:8 344:9 counter 168:1 489:14 countries 129:13 205:16 country 174:18 217:18 370:1 416:7 444:9 484:20,22 485:3,8 495:12 country's 176:16 county 295:14 451:20,20 467:22 476:15 511:2 515:3 couple 31:14 63:17 95:11 104:22 161:21 194:8 | 196:2 213:3,10 234:5 266:3 275:8 277:7 279:18 310:4,20 385:1 400:8 403:15 431:22 465:7 472:14 523:3,7 course 87:4 105:11 169:13 172:8 174:12 348:17 372:20 373:8 442:12 498:9 503:19 cousin 212:9 cover 67:7 88:5 225:9 451:10 496:5 coverage 453:18 covered 21:5 243:20 406:9 431:20 covers 20:16 21:17 486:3 cows 80:18 511:13 co-chair 407:6 co-founded 150:3 co-op 162:10 166:21 291:4 295:18 380:7 co-ops 518:3 craft 382:14 crash 58:9 crashing 83:22 crazy 135:15 create 6:6 122:2 150:4 152:16 303:2 494:13 created 12:5 229:21 423:20 creates 353:16 424:5 creation 13:11 creative 57:8 450:12 creativity 394:16 credibly 439:16 Creek 486:11 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-----------------------------|----------------------------|---------------------------|----------------------------|---------------------------|
| creeper 6:2 | 334:22 338:9 | cumulative 394:9 | 399:11 406:19 | 501:18 |
| Crimson 462:15 | 339:2 341:4,11 | curative 263:3 | cuttings 313:21 | Daniella 153:9 |
| crisis 176:1 309:9 | 352:12 366:1 | 340:7,18 | Cuyama 400:4 | 161:14,17 |
| criteria 81:9 117:7 | 371:3 393:14 | cure 479:11,13 | cycle 74:9 111:9 | dark 6:5 |
| 302:5,7 315:8 | 398:16 463:18 | curious 162:2 | 189:1 309:4 | data 84:3 134:19 |
| critical 55:20 76:15 | 491:2,4 496:12 | 417:1 446:19 | 366:18 462:19 | 152:20 156:14 |
| 143:5 183:21 | 512:17 | current 11:9 19:18 | 463:3 | 218:15 219:3 |
| 229:21 233:11 | cross 129:22 | 22:5 50:1 82:21 | cycles 52:5 213:1 | 241:22 245:7,10 |
| 239:21 242:22 | 397:15 | 187:22 213:1 | 352:13 499:22 | 245:15,17,19 |
| 293:13 297:8 | crossed 202:9 | 225:4 227:9 | cyclines 346:2 | 254:5 258:15 |
| 381:19 385:1 | crowded 63:22 | 228:13 282:10 | Cynthia 331:7,10 | 275:21 332:6 |
| 454:7 463:21 | 65:11 | 291:18 292:22 | 335:6,11,13 | 334:6 409:15,17 |
| 464:1 467:2,4 | crowding 60:6 | 299:3,16 314:6 | Cytogenetics | 411:10 414:13 |
| 479:20 489:18 | crucial 393:3 | 366:9 367:10,15 | 120:20 | 418:6 421:20 |
| critically 323:18 | 509:16 | 368:17 371:20 | cytokine 312:19 | 422:7 430:17,20 |
| 386:4 | crucially 351:14 | 387:2 391:10 | Cytology 120:20 | 447:3 498:9 509:4 |
| criticism 34:17 | Crupain 495:17 | 410:20 445:8 | | database 333:13 |
| criticizing 420:7 | 500:12,15,16 | 447:20 449:17 | D | 374:20 |
| crop 63:2 75:18 | 506:15 507:4 | 456:22 488:17 | D 3:5 4:1 119:20 | date 25:6 27:1 |
| 122:19 123:20 | Cruz 403:6 | 489:3,19 | 230:7 309:21 | 117:11 227:9 |
| 124:6 220:9,16,17 | Cruz-Watsonville | currently 30:3 | 310:18 311:2,19 | 286:16 287:11,18 |
| 220:19 223:9 | 398:12 | 52:11 59:12 70:3 | 312:7 317:21 | 289:11 290:4,16 |
| 225:10,15 243:20 | crystal 346:6 428:3 | 85:21 100:5,18 | 321:1 323:11 | 290:20 291:17 |
| 283:16 289:13 | CSA 517:21 518:3 | 103:10 108:9,15 | 324:6,15 325:14 | 292:8,21 293:8 |
| 305:8 311:18,21 | cubic 86:9,20,21,22 | 134:2 178:12 | 325:20 326:14 | 296:16 297:1 |
| 312:9 317:22 | cue 335:11 | 193:12 216:18 | 327:17,21 329:14 | 299:3,4,13 344:3 |
| 318:5 324:10 | Culmination | 230:20 270:14 | 331:12,16 332:8,9 | 352:18 363:10 |
| 331:22 332:10 | 134:19 | 294:1 313:21 | 332:22 333:2,4,7 | 366:2 367:8 382:1 |
| 333:18,22 356:17 | cultivars 294:6 | 341:13,18 365:17 | 333:12,14,17,22 | 383:8 394:20 |
| 369:2 393:22 | 384:10 443:16,18 | 370:20 444:6 | 334:13 335:20 | 397:6 412:18 |
| 420:19 443:9 | cultivation 223:13 | 455:13 496:18 | 336:8,12 338:7,11 | 413:12,20 414:3 |
| 446:7 463:9 | culturable 211:12 | curve 434:17 | 339:15 340:6 | 425:6,11 431:17 |
| 475:21 476:13 | cultural 220:21 | cushion 35:2 | 498:21 | 435:15,15,20 |
| 480:9 486:22 | 225:4 371:18 | cusp 384:20 | daily 24:10 33:21 | 456:10,22 481:2 |
| 496:5 | 372:13 377:4 | custody 220:1 | 34:7 439:12 | dated 314:7 |
| cropping 492:15 | 462:22 512:21 | 416:3 | 494:11 500:19 | dates 291:19 |
| 496:6 | culture 62:6 70:1 | customer 482:17 | dairy 31:2,3 125:13 | 292:17 411:21 |
| crops 3:20 4:14 | 79:20 87:21 88:5 | customers 293:5 | 129:18,22 291:7 | 457:3,8 488:22 |
| 65:1 87:18 194:16 | 91:15 96:13 206:3 | 380:5 385:16 | 360:15 363:16 | 489:4 |
| 196:15 282:16 | 206:8 234:10 | 387:12 388:4,7 | damage 274:1 | daughter 523:6 |
| 285:4 286:20 | 494:12 | 391:7,15 392:6 | damaging 200:19 | Dave 111:18 |
| 289:8 301:18 | cultured 61:17 | 453:21 482:21 | 482:3 | 133:10 141:3,5,13 |
| 303:3 304:17 | 62:2 234:11 | 511:16 | Dan 278:2 | 146:6 147:6 |
| 311:4,8 312:3 | cultures 62:1,3,3 | cut 195:20 399:4,7 | Danby 359:6 | 149:12 150:15 |
| 317:13 318:7 | 75:20 | 475:20 | danger 504:15 | 192:3 |
| 322:15 323:5 | culture-based | cuts 57:22 | 510:9 | Dave's 149:13 |
| 326:16 328:15 | 214:18 | cutting 319:10 | dangers 205:10 | David 182:13 186:9 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 186:11 397:21 398:4 404:21 406:22 407:4 411:22 422:11 423:1 443:21 459:7 467:18,21 472:1 477:17 Davis 317:5,10,11 323:15 day 4:20,22 7:7 34:1,18 78:6 106:16 125:13 145:10,10,16 161:21 164:5 188:16 198:6 208:15 217:11 243:13 252:2 264:21 266:13 278:1,5 354:7 397:22 460:8 461:2,17 463:2 464:11 495:18 502:15 510:17 days 25:3,5,18,18 27:1 63:17 156:4 196:2 209:3,6 213:11 215:1,1 257:17 330:4,12 330:14 371:5 409:22 410:1 416:13,16 421:11 471:1 472:21 518:12 day-to-day 397:3 dead 467:2 deadline 26:21 121:14 356:8 363:15 457:5 deadlines 456:18 deadly 389:8 deal 34:1 80:4 138:11 213:7 268:20 270:7 306:20 320:1 325:11 371:13 400:19 401:22 429:2,4 | dealing 19:5 81:7 149:7 213:9 230:13 244:4,6,6 309:7,8 383:14,16 400:22 461:7,18 462:4 deals 270:21 dealt 28:18 31:8 93:7 179:8 dean 229:16 dear 81:19 death 76:21 135:4 184:2,8 463:15 464:1 502:14 505:7 debate 100:12 195:10 283:12 293:15 442:6,12 479:21 debated 69:14 302:17 decade 264:1 380:20 decades 455:10 decays 324:10 December 108:13 decide 511:22 512:1 decided 285:5 286:20 deciding 260:12 decision 14:1 29:16 33:5 243:13 280:19 285:9,9,17 288:9 300:21 332:9,11,15 353:17 366:14 380:15 395:16 411:16 412:22 455:22 456:13 459:19,21,22 decisions 33:8 165:13 295:5 350:20 351:10 389:21 390:3 411:20 497:20 decision-making | 19:10 332:14 deck 22:13 133:11 141:4 149:17 153:9 161:15 167:12 178:3 182:13 316:21 320:20 331:7 343:7 350:3 358:20 365:11 370:13 379:13 386:18 392:17 398:5 407:1 424:21 429:15 441:16 453:2 459:7 467:19 478:1 485:20 490:13 495:17 500:14 507:14 510:22 declaration 37:1 284:10 334:10 476:13 declare 140:20 declared 124:18 451:21 452:2 declined 63:4 decrease 510:12 dedicated 4:14 217:10 deemed 508:17 deeper 497:16 defects 333:15 Defense 45:20 defensible 489:20 defer 335:5 deferment 41:10 deficiencies 137:12 deficiency 88:12 135:6 137:12,13 137:13 138:1 140:5 151:6 157:17 deficient 89:20 defined 332:17 333:5 337:9 defines 332:20 defining 74:20 | definite 483:1 definitely 124:8,10 183:22 241:20 327:19 334:22 459:20 definition 121:2,8 123:3,5,12,20 126:7,12 332:12 499:19 definitions 179:3 definitive 251:5 406:5 degradable 325:16 328:7 degrade 111:6 degradation 146:13 279:12 410:14 degrade 207:13 208:8 279:16 326:2 330:18 degraded 113:15 207:21 degrades 257:17 336:20 338:7 degree 146:17 148:2 169:16 229:1,3 255:20 409:1 degrees 131:16 159:15 329:13 330:4 delay 108:1 delayed 474:1 delaying 188:8 deliberation 14:7 522:8 deliberations 13:20 13:22 14:12 16:22 33:4 43:1 191:14 delicate 149:5 delighted 106:14 delivered 34:15 347:20 422:5 demand 151:8 252:12 368:5 489:7 516:10 | democratic 295:3 demographics 441:8 demonstrate 239:16 341:22 356:3 demonstrated 208:11 demonstration 169:6 Dempster 379:12 386:16,19 390:14 390:22 391:14 392:14 denature 53:20 Denevan 398:3,6,7 398:14 403:11,14 405:8 denied 499:10 dense 144:4 densities 73:5 85:22 86:7 density 52:19 65:3 65:5 73:2,8 76:12 85:17 86:14,19 87:14 362:11 Department 1:1 87:22 91:3 131:5 132:8,15,17 133:3 204:7,11,13 216:2 216:7 217:13 229:13 365:13 370:10 402:4 486:2 depend 105:11 161:7 dependence 382:7 dependent 225:3 228:10 450:20 depending 79:19 281:4 330:8 424:1 424:3 depends 373:9 409:2 depleted 496:4 deploy 53:13 depressing 155:6 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------|---------------------------|---------------------------|-----------------------------|---------------------------|
| Deputy 2:12 36:4 | 265:19 307:18,20 | 337:19 394:12 | 44:6 45:9 50:2 | DiMatteo 21:7,16 |
| derived 110:18 | determined 333:14 | 480:21 490:19 | 56:11,18 66:6 | 21:18 |
| 180:9 311:22 | determines 307:22 | 503:10 505:11 | 75:9 79:22 90:22 | diminish 394:9 |
| 318:9 | detracts 489:5,11 | developments 17:7 | 91:4 93:13 101:1 | diminishing 196:12 |
| describe 79:13 | detriment 354:2 | 101:21 | 101:16 115:6 | dinner 62:22 127:1 |
| 93:18 173:3 | detrimental 325:17 | develops 502:17 | 135:16 136:1,16 | dioxide 77:9 |
| 185:19 423:16 | devastate 389:13 | 503:17 | 137:17 139:20,20 | dipping 314:20 |
| described 118:7 | devastating 261:6 | devil's 401:8 | 142:15 148:6,7,8 | 315:6 |
| 287:19 307:9 | 360:21 369:2 | devoted 490:18 | 150:8 154:13,14 | direct 94:15 189:7 |
| 340:1 351:4 | 381:15 382:9 | de-duplicating | 160:12,19 167:18 | 204:1 215:18 |
| describes 74:22 | 456:5,7 479:15 | 344:10 | 180:11 185:11,14 | 307:11 353:16 |
| description 223:1,3 | develop 19:13 29:1 | diagnostic 69:3 | 185:15 189:22 | 417:22 418:13 |
| 223:4,7 224:4 | 75:22 91:7 123:4 | 178:16 | 198:7,21 221:16 | 482:20 500:19 |
| 288:14 | 126:6 160:14 | dialogue 492:16 | 223:16 227:19 | 523:5 |
| descriptions 40:19 | 222:21 321:12 | Diane 379:12 | 232:17 235:9 | directed 99:16 |
| desert 403:21 | 323:7,12 327:14 | 386:16 391:5 | 296:12 308:9 | 186:18 229:22 |
| 405:21 406:1 | 327:22 341:17 | 392:13 | 322:2,3,18 325:21 | 243:16 409:4 |
| 517:17 | 350:15 417:5 | DICKSON 1:17 | 329:8,10,14,21,21 | direction 82:17 |
| Designated 11:11 | 482:4,9 | dictionary 131:17 | 357:17 363:19 | 248:7 341:7 |
| designed 301:9 | developed 51:10 | die 77:12 144:21 | 375:12 378:21 | 397:16 |
| desired 19:19 | 63:14 106:2,2 | 179:12 400:14 | 406:6 411:4,16 | directly 13:1 58:4 |
| 26:16 | 126:5 158:3 263:7 | 479:4,4 481:12 | 422:12 425:14 | 212:19 242:10 |
| destroy 401:3 | 263:13 311:10 | 494:17 | 428:8 431:11 | 244:13 400:14 |
| 404:1 | 314:5 321:8 329:9 | died 183:3 184:10 | 437:17 460:12,14 | 485:3 487:7 |
| destroyed 174:19 | 333:9 337:20 | 502:3 | 470:15,17 472:14 | director 2:16 11:7 |
| detail 66:8 85:8 | 404:8 442:12 | dies 505:6 | 476:17 487:19 | 45:15,22 134:2 |
| 116:6 120:2,15,19 | 444:7 445:19 | diet 113:7 114:16 | 488:7 514:22 | 228:18 507:17 |
| 124:7 125:19 | 456:12 469:1 | 137:6,10,11,15 | differently 112:8 | 519:17 |
| 173:20 414:2 | 471:10 474:8,9 | 141:2 144:19 | 269:2 318:15,16 | Directors 216:19 |
| detailed 25:16 | 478:22 492:10 | 145:17 146:18 | differing 304:3 | 398:9 |
| 74:18 122:15,17 | developing 97:7 | 150:21 151:16,18 | differs 269:9 308:6 | dirt 163:13 186:4 |
| 122:21 | 259:9 264:12 | 183:17 193:11 | difficult 50:13 82:5 | 423:3 |
| detailing 295:22 | 292:2 321:16 | dietary 47:2 | 88:20 92:6,7 | disagree 423:3 |
| details 94:22 401:8 | 324:6 353:1 461:6 | diets 114:13,13,22 | 101:19 144:7,19 | disagreement |
| detect 423:9 | 498:17 | 136:17,22 138:2 | 147:19 193:22 | 308:21 |
| detectable 261:18 | development 3:8 | 139:14,15,15,20 | 244:21 266:1 | disagrees 366:14 |
| 410:22 | 7:3,8 13:10 16:5 | 140:3 | 269:12 395:9 | disappeared 361:2 |
| detected 212:5 | 17:2,12,19 30:1,3 | difference 84:14 | 451:1 459:18,19 | disappointed |
| 238:14 | 30:6,14 31:4 | 85:17 115:4 215:2 | 479:2 | 460:11 |
| detection 222:9 | 47:14 99:13 110:4 | 215:14 261:1 | difficulties 452:15 | disaster 476:12,14 |
| 254:18 257:2 | 124:4 134:3 198:9 | 275:15 314:22 | difficulty 146:11 | 490:8 |
| 263:15 264:17 | 217:22 229:20 | 364:13,20 392:1 | 146:18 147:11 | disasters 480:13 |
| 420:2,20,20 | 231:17 236:12 | 415:14,16 416:17 | 277:1 353:20 | discharge 58:4 |
| detects 418:7 | 242:7 262:21 | 471:19 | digest 24:11 33:21 | disclose 262:15 |
| determine 35:14 | 263:8 271:19 | differences 52:15 | digging 6:17 | disclosure 283:9 |
| 117:16 125:10,15 | 292:9 311:8 | 446:10 515:8 | diligently 43:15 | 284:19 300:8 |
| 125:16 222:11 | 312:20 314:3 | different 33:18 | Dillar 344:18 | 403:5 |
| | | | | discover 29:14 |

| | | | | |
|---------------------------------------|--------------------------------|-------------------------------------|-----------------------------------|-----------------------------|
| discovered 54:4 151:5 238:3 | 366:21 367:14 368:21 370:19 | distribution 453:18 454:8 | 83:9 93:5 98:12 103:2,11 104:1 | 144:8 157:2 158:19 178:4 |
| discoveries 96:9,21 | 371:17 373:12,13 | distributor 379:17 | 125:19 126:10 | 181:17 182:9 |
| discovery 504:9 | 378:5 381:14 | 453:16 | 139:22 149:6 | 197:6,7,13,18 |
| discuss 193:6 | 383:15 407:18 | distributors 380:1 | 196:6 224:12 | 198:1,3 204:5 |
| 280:22 315:22 | 429:9 488:10,16 | district 295:14 | 249:8 266:4 268:1 | 205:1 215:21 |
| 370:19 | 488:18 | Ditto 514:19 | 268:2 273:17 | 228:17 229:18 |
| discussed 37:6 | diseased 72:2 | diver 53:2 | 300:17 359:10 | 231:3,4 239:1 |
| 304:17 | diseases 99:14 | diverse 228:5 | 386:13 415:6,8 | 242:1,18 243:15 |
| discussing 42:20 | 170:20 174:15 | 251:13 369:21 | 420:10 421:16 | 244:10,10 245:14 |
| 48:3 97:7 113:5 | 178:14 179:12 | diversification | 432:16 438:2 | 246:7,20 249:17 |
| 448:22 | 204:16 228:22 | 225:10 | 449:18 459:5,17 | 250:7 251:12,15 |
| discussion 8:10,13 | 229:11 269:22 | diversified 361:18 | 459:18 460:6 | 253:3,22 254:14 |
| 8:22 18:9,17 | 270:18 271:8 | diversity 174:10 | 474:1 477:13 | 255:8,11 256:18 |
| 20:14 21:21 25:1 | 311:4 318:21 | 204:19 228:12 | 487:18 | 257:14,16,16,21 |
| 25:10,15,21 26:2 | 319:13 321:7 | 491:2 | dollars 163:21 | 258:5,11 260:16 |
| 26:7,10,16,18,22 | 325:12,21 326:16 | divide 397:15 | 363:2 480:7 | 262:18 263:5 |
| 32:8,12,13 38:8 | 328:14,14 339:2,3 | Division 2:16,18 | 493:10 | 266:2 269:16 |
| 40:14 41:7 68:19 | 339:14,14,16 | DIXON 38:17 42:6 | domestic 50:20 | 270:5 271:15 |
| 119:3 122:12,14 | 340:12 370:18 | DNA 119:20 | 369:15 382:11 | 272:7,10 274:20 |
| 166:2 196:19 | 426:13 428:21 | 206:14 | dominate 4:16 | 274:21 275:6 |
| 232:9 262:1 280:9 | 517:3 | docket 246:4 | 51:17 | 277:19 279:11,20 |
| 281:9 285:3 | disinfectant 99:9 | 434:11 | donors 140:10,10 | 280:2,6 282:1 |
| 288:21 298:21 | disperse 166:16 | doctor 466:9 | Doodle 379:1 | 306:1 310:14,17 |
| 315:19 338:1 | display 485:14 | document 8:10,22 | door 163:10 476:2 | 313:8 372:21 |
| 352:20 368:9 | disproportionate | 11:8,14,15 15:5 | doors 523:11 | 407:2 408:12 |
| 426:11 | 285:22 | 18:10,17 20:15 | Doppler 57:17 | 412:2,5,16 413:10 |
| discussions 14:9 | disregarded 465:22 | 21:21 26:2,8,16 | dormancy 449:6 | 413:15 414:5 |
| 93:9 294:1 351:17 | disrespect 348:5 | 26:17 34:6 83:6 | dormant 474:1 | 415:5,18 417:11 |
| 357:12 | disruption 396:17 | 119:4,7 128:10 | 488:13 | 417:17 418:3,11 |
| disease 69:5 135:3 | 396:19 | 139:5 288:3 | dosage 255:12 | 418:14,20 419:1 |
| 135:7,11 138:4,9 | disruptions 480:11 | 295:20 302:22 | dose 255:3 307:4 | 419:14 421:6 |
| 138:18 178:16 | disruptive 182:2 | 307:15 497:1 | 460:5 | 422:3,18 423:22 |
| 180:7,14,18 | dissemination | documented 88:12 | doses 213:14 | 424:13 434:10 |
| 197:14,15,16 | 509:9 | 222:2 241:20 | 255:16 503:8 | 500:15,16,18 |
| 220:10,16 221:2,3 | dissertation 508:11 | 383:9 | dose-dependent | 503:2 506:15 |
| 221:6,10,12 222:1 | disservice 492:20 | documenting | 418:4 | 507:4 |
| 223:6,9,20 224:7 | dissolved 75:16 | 237:12 | double 266:12 | draft 355:10 387:5 |
| 225:2 227:17 | 80:3 | documents 25:1,10 | 470:2 | dramatic 113:9 |
| 228:13 229:8 | distance 73:14 81:2 | 25:15,20,21 26:5 | doubt 100:14 402:5 | 170:13 175:18 |
| 231:11,13 238:17 | 81:13 | 26:22 418:19 | doubts 96:4 | 239:17 496:7 |
| 246:2,5 282:11 | distant 212:9 | dog 111:5 114:6 | downgrading | draw 97:2 293:1 |
| 289:14 295:21 | Distilling 491:18 | dogs 113:7,20,22 | 201:13 | 394:22 |
| 319:2,21 320:1,6 | distinct 252:21 | 114:3 134:11,21 | downstream 53:14 | drawing 177:13 |
| 321:8 324:8 | distinction 433:16 | 137:20,21 140:5 | 261:11 393:18 | drawn 51:7 522:6 |
| 330:11 339:6 | distinguished | 144:8,10 155:9 | dozen 265:1 480:12 | drier 201:17 202:1 |
| 354:8 360:21 | 230:8 485:21 | doing 36:8 57:12 | Dr 11:21 109:7,17 | driest 405:22 |

| | | | | |
|---------------------------|-----------------------------|----------------------------|----------------------------|---------------------------|
| drifting 97:22 | D.C 433:2 507:7 | 161:21 164:5 | 418:4 427:21 | eggs 55:9,12 158:6 |
| drinking 338:12 | | 165:3 189:6 | 463:18 469:5 | 158:8 163:4,5,20 |
| drive 458:7,13 | E | 344:21 499:7 | effective 52:5 54:6 | 183:11 496:2 |
| 481:4 514:13 | e 3:5 4:1,1 212:9,11 | eaten 46:16,17 | 71:10 72:17 199:5 | eight 4:3 50:18 |
| drives 197:21 | 234:17 239:6,9 | eating 27:14 | 221:19 246:18 | 52:4 122:17 |
| driving 82:17 | eager 98:5 | 145:15 164:14 | 270:19 277:2 | 188:19 399:19 |
| 394:14 495:10 | ear 252:14,15 | 165:2,7 183:4,10 | 328:10 340:14,17 | 523:19 |
| drop 430:16 468:20 | earlier 38:2 73:3 | 215:7 520:1 | 346:20 347:10 | either 57:16 80:12 |
| dropped 515:1 | 74:7 76:5 195:6 | eats 217:10 | 366:13 373:4 | 94:15,18 102:14 |
| dropping 189:20 | 269:10 328:5 | ecologic 255:15 | 394:12 400:15 | 117:21 143:14 |
| 382:4 463:13 | 336:11 349:6 | ecological 171:9 | 401:14,17 422:16 | 144:17 146:15 |
| drove 198:6 | 360:2 386:17 | 499:20 500:4 | 468:8 470:12 | 180:10 190:4 |
| drug 240:4,10 | 400:9 408:5 | ecologically 493:22 | 471:8 478:18 | 193:5 224:10 |
| 270:6,6,8,17 | 432:10 459:13 | ecology 204:18 | 480:21 498:6,15 | 233:16 242:10 |
| 271:1,6,10 332:13 | earliest 465:3 | 241:14 256:4,7 | 508:8,8 | 260:10 270:18 |
| 332:17,19,20 | early 14:9 183:15 | 261:16 | effectively 228:14 | 350:21 375:10 |
| 333:6 346:4 | 199:1 362:3 | economic 30:19 | 484:21 | 470:13 501:20 |
| 504:18 | 371:11 380:12 | 481:14 | effectiveness | 507:13 |
| drugs 270:13 271:9 | 444:9 455:14 | economically | 223:19 224:5 | elaborate 415:13 |
| 271:11 498:12 | 473:5 522:9 | 443:14 494:1 | 373:8 434:14 | electrical 77:1 |
| 501:20 502:21 | Earl's 380:8 | economist 46:9 | 475:13 498:14 | electrocution 77:2 |
| 504:2 | earth 6:1 74:9 | ecosystem 51:8,9 | effects 76:14 185:2 | electronically |
| drum 92:15 | 75:14 | 51:16,18 58:8 | 189:10 244:7 | 290:22 |
| dry 111:5 138:2 | Earthbound | 80:19,21 496:8 | 258:5 325:18 | element 96:16 |
| 146:10,12,18,20 | 433:14 | ecosystems 174:13 | 333:16 337:17,22 | elements 96:20 |
| 277:14 361:4 | earthworm 334:7 | edge 408:3 | 338:4 385:9 | 99:8 232:18 352:5 |
| Duart 52:13 | earthworms 332:6 | editorial 188:5 | 427:21 456:9 | 411:15 |
| due 25:6 63:5 | 337:22 338:4 | educate 467:15 | 458:6 513:7,9 | elevated 134:15 |
| 189:19 203:15 | ease 10:12 233:3 | 494:4 505:1 510:5 | efficacy 204:20 | elevation 228:6 |
| 207:13 232:14 | easier 148:18 | 510:14 | 322:12 324:12 | Eleven 417:11 |
| 296:7 399:16 | 249:14 399:12 | educated 434:5 | 325:21 336:7 | eliminate 260:21 |
| 400:6 410:13 | 513:4 | 493:14 | 504:5 | eliminated 511:15 |
| 480:9 | easily 118:21 | educating 509:21 | effluent 79:12 | eliminating 178:22 |
| duly 140:12 | 120:12 179:12 | education 227:6 | Effluents 73:13 | 328:10 481:4,17 |
| duration 76:12 | 232:16 401:3 | 291:19 457:1 | effort 100:17 | elimination 496:12 |
| 209:4 352:7 | 504:16 | 508:14 509:15 | 195:18,22 357:6 | Elizabeth 507:12 |
| dust 473:20 | east 442:3 | 517:10 | 358:9 391:18 | Elston 45:18 |
| duty 499:9 | Eastern 380:8 | educational 414:22 | 408:1 474:16 | email 11:10 24:11 |
| dwarfing 377:18 | easy 7:6 198:4 | 458:4 | 495:15 497:7 | 24:11 34:7 278:4 |
| 378:2 | 249:12 263:18 | effect 92:4 188:14 | 514:13 519:14 | 378:22 440:7,8 |
| dying 153:5 | 343:19 425:18,18 | 210:8 256:8 | efforts 357:17 | 483:15 |
| dynamic 97:17 | 429:4,4 439:12 | 259:12,14 326:15 | 367:6 384:6,19 | emails 12:4 34:1 |
| dynamics 197:16 | 471:3 472:17 | 328:6 330:14 | 409:2 413:8 482:4 | 482:19 |
| 288:17 | 516:18 | 336:19,19,22 | 489:11 494:4 | embrace 129:1 |
| D'Auria 453:2 | eat 5:13 68:10 | 337:4 354:5 | egg 160:14 182:15 | emergence 71:10 |
| 459:6,8,10 467:13 | 144:22 145:13 | 361:15 375:13 | 186:14,15,15 | 231:14 |
| 467:17 | 155:2 158:14 | 376:9 389:19 | 188:17 | emergencies |

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 451:20 emergency 230:1 446:4 450:19,21 451:10 452:12 emerging 17:5 228:19 Emory 229:6 emphasis 197:15 276:1 358:5 emphasize 237:15 emphasized 71:20 emphasizing 453:5 emphatically 480:19 employ 71:16 employees 379:19 employing 264:16 enable 16:12 17:3 28:8 encountered 182:22 encountering 260:20 encourage 134:16 156:13 195:21 290:5 339:9 364:21 395:5 413:8 436:11 490:5 497:3,8,15 encouraged 132:19 317:20 encourages 29:22 393:10 encouraging 488:19 ended 288:2 endorse 132:8 324:14 ends 77:17 215:16 352:11 355:13 358:12 endure 6:8 energy 92:14 423:5 enforceable 307:19 enforced 118:4 enforcement 20:11 104:10,18 | enforcing 118:4 engage 315:21 engaged 195:10 engagement 27:20 English 131:17 enhance 16:12 500:3 enhanced 77:7 enhancement 271:13 enhancements 496:6 enhances 499:21 enjoy 367:19 519:6 enjoyed 460:8 enormous 119:22 120:15 434:3 enrich 58:5 ensure 14:14 23:22 137:17 354:18 368:16 420:15 495:7 ensures 28:14 352:16 363:9 ensuring 218:1 299:19 430:3 enter 259:16 entered 496:4 enterobacteriaceae 212:10 enterococci 234:19 enters 59:17 entertain 32:7,11 243:3 entire 116:5 150:20 206:8 224:18 235:21 348:1 367:13 382:6,15 397:17 446:8 456:1,4 480:5 entirely 28:5 101:16 336:5 455:7 entry 237:21 environment 58:3 58:5,5 90:5 171:8 173:22 212:22 | 236:14,16 244:13 244:15,18 245:5 257:10,18 258:3 259:2 297:7 306:8 306:16 307:4 315:10 326:3 328:9 338:8 339:7 389:20 402:12 434:7,16 449:2,17 461:7 464:8 494:3 503:13,20 508:20 environmental 28:17 45:20 66:7 74:18 76:10 85:7 85:10 98:13 169:10 190:4 228:11 241:18 258:13 259:4 297:19 300:6 319:7 323:2 336:17 337:10 383:5 385:9 386:12 408:14 430:22 431:12 466:7 467:9 493:13 515:6 environmentally 320:10 environments 205:8 236:21 244:5 envy 437:6 459:20 499:14 EPA 199:16 202:5 249:20 250:9,18 254:5,15 255:8 257:6 271:22 307:12,17 308:1 323:13,20 326:13 332:18 333:10,13 333:19 338:10 341:10,12 369:10 409:17 415:15 416:6,19 417:8 418:18 419:5,11 419:16 421:5,14 421:17 422:6 | 451:19 epidemic 229:7 263:12 epidemics 211:21 epidemiology 197:14 204:18 229:13,22 321:6 equivalencies 123:17 equivalent 292:9 eroding 28:9 erroneous 8:9 491:18 erwinia 211:19 212:9 escape 73:16 170:5 escaped 173:21 escapes 170:11,19 430:18,21 especially 29:12 30:12 111:5 113:21 123:16 179:13 184:18 199:13 247:6 298:11 345:3 360:1 369:18 404:4,15 425:19 430:19 433:2 509:5 essence 12:15 48:8 essential 96:13 108:6 110:18 134:11,18,21 135:1 143:1 147:8 151:20 152:2 153:18 154:5 155:7 272:18 312:12 324:3 338:21 339:5 512:14 essentiality 194:1 306:10 315:11 338:20 374:15 essentially 113:10 113:13 120:3 135:2 142:2 177:18 234:10 | 287:9,21 establish 14:22 17:18 18:21 23:13 70:10 339:8 386:8 416:9 established 29:18 70:3 104:4 225:16 228:19 231:1 292:16 establishes 111:19 establishing 277:1 278:13 establishment 230:3 estimate 63:12 210:1 et 114:2 115:10 280:5 488:13 etcetera 359:14 EU 219:11 247:13 247:19 249:14 268:21 269:6,6,11 487:17 488:2 Eugene 350:7 Europe 50:14 86:22 199:17 246:15,22 248:4 249:1 374:2 400:3 512:16 European 50:15 evaluate 103:8 192:19 220:5 269:5 306:3,7 437:3 evaluated 323:18 evaluating 19:1 140:21 222:14 307:14 evaluation 75:8 224:5,19 311:9 evening 523:18,18 event 203:16 241:7 242:15 261:8 475:19 events 241:13 261:10 eventual 376:18 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|---------------------------|----------------------------|----------------------------|---------------------------|---------------------------|
| 384:7 | 433:12,15 | exhibit 279:2 | 448:20 451:11 | Expo 189:21 |
| eventually 82:21 | exceed 58:8 75:16 | exist 28:17 75:9 | 453:12 457:10,16 | export 219:12 |
| 91:14 469:1 482:5 | exceeded 84:1 | 86:4 94:11 151:12 | 468:12 471:2 | 487:17 |
| Evergreen 216:4 | 159:9 380:2 | 300:9 366:22 | 472:6 473:1 478:5 | exporting 374:2,4 |
| everybody 7:5 | Excellence 230:22 | 393:16 426:20 | 498:13 506:14 | exposed 60:13 |
| 57:12 59:7 127:16 | excellent 122:15 | 481:2 | experienced 226:22 | 70:22 71:1 359:22 |
| 151:13 153:17 | 180:5 373:3 509:2 | existing 19:9,12,14 | experimenting | 513:18 |
| 193:1 196:17 | exception 75:3 | 28:11 30:8,17,20 | 406:10 | exposes 513:14,16 |
| 198:8 265:3 | 343:12 | 88:4 89:6 102:22 | experiments 406:7 | exposing 344:22 |
| 342:19 365:3 | exceptional 471:18 | 104:7 108:18 | 415:4 | 504:16 |
| 426:16 429:16 | exceptions 172:3 | 293:3 395:5 | expert 227:15 | exposure 34:20 |
| 460:7 483:20 | 492:7 | exists 420:12 | 230:13 246:22 | 207:21 213:8,10 |
| everybody's 193:3 | excepts 439:7 | exit 520:13 | expertise 91:11 | 236:20 257:18 |
| 426:18 | exchange 4:6,18 | exotic 138:15 | 177:21 419:2 | 279:14 307:10 |
| everyone's 195:4 | 212:1,8 278:5 | expand 238:15 | experts 69:13 | 309:1 346:20 |
| 316:18 | excited 36:11 196:4 | 269:5 396:7 | expiration 286:16 | extend 273:1 292:7 |
| everything's | 490:7 | expanded 75:1 | 287:11,18 289:11 | 299:13 341:10 |
| 472:18 | exciting 53:18 | 138:2 | 290:4,16,20 | 366:1,15 414:3 |
| evidence 211:3 | 196:18 519:9 | expansion 494:5 | 291:17,19 292:8 | 435:19 514:2 |
| 212:18 336:6,8 | exclude 332:9 | expect 24:5 102:4 | 292:17 293:8 | extended 363:17 |
| 369:8 | excluded 42:19 | 279:11 397:19 | 296:16,22 299:3,4 | 393:13 478:21 |
| evident 367:10 | 67:1 116:3,10,18 | 472:21 473:9 | 344:2 366:2 367:8 | extending 260:11 |
| evil 492:8 | 116:21 117:1,12 | expectation 305:12 | 382:1 383:8 397:6 | 425:5 450:17 |
| evolution 83:11 | 117:17 118:2 | 412:12 431:19 | 411:21 431:17 | extension 287:8 |
| 85:13 351:3 352:2 | 119:13 120:17 | 433:20 505:18 | 456:21 457:3,8 | 290:16,20 291:11 |
| 503:5 | 121:2,8 122:3 | 521:20 | 488:22 489:4 | 292:6 293:20 |
| evolutionary 233:5 | 123:3,6 124:5,18 | expectations | 505:19 | 296:22 299:5,22 |
| 233:7 | 125:12,17 126:7 | 292:22 302:4 | expire 298:6 | 300:11 301:12 |
| evolve 80:19 | 130:22 | 394:21 439:4 | 385:18 393:5 | 305:9 352:7,10,11 |
| evolved 68:10 | excludes 48:20 | 520:2 | 445:9 447:20 | 367:7,15 371:1,16 |
| evolving 69:10,11 | exclusive 327:17 | expected 418:5 | explain 147:11 | 377:16 383:14 |
| 93:15 97:15 | exclusively 327:11 | expecting 330:11 | 159:22 160:6 | 397:6 412:8 413:9 |
| exacerbate 378:5 | 333:1 | 413:16 | 173:20 207:1 | 414:15,18,21 |
| exact 250:14 | excreted 210:3 | expects 384:5 | 220:5 355:13 | 431:17 456:10 |
| exactly 43:2 78:20 | excuse 18:2 32:16 | expedited 28:18 | 356:20 358:6 | 468:15 478:15 |
| 125:19 255:10 | 37:19 64:1 108:22 | expensive 58:2 | 364:19 438:7 | 480:3 482:8 490:2 |
| 256:19 318:2 | 109:8 317:6 350:1 | 163:20 245:5 | 450:5 457:16 | 491:5 522:2 |
| 329:7,12 483:16 | executive 1:11 11:7 | 248:2 400:16 | 491:17 | extensive 11:13 |
| example 26:7 29:6 | 45:15 285:16 | experience 127:7 | explained 356:18 | 25:20 75:13 |
| 50:14 52:14 53:6 | 519:17 | 133:22 198:16 | explaining 466:10 | 333:13 |
| 59:4 89:18 171:2 | exempt 323:20 | 227:2 248:16 | explains 371:17 | extensively 407:11 |
| 174:20 205:19 | exemption 341:16 | 251:17 266:6 | explicitly 31:5 | extent 177:15 |
| 207:19 233:22 | 419:19 | 270:7 304:3,5 | 222:5 | 248:22 290:5 |
| 264:14 329:15 | exemptions 341:11 | 318:7 325:9,12 | exploding 267:11 | 329:22 356:3 |
| 396:18 | exercise 72:22 | 354:3 370:18 | exploited 30:13 | 364:6 |
| examples 30:21 | exert 408:22 | 398:15 422:12 | explored 120:14 | external 55:21 |
| 153:3 405:5 | exhausted 383:11 | 432:3 435:8 | exploring 407:21 | extirpation 174:5 |

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| extra 342:17 437:16 | 389:17 390:1 460:18,21 462:9 466:20 | 480:4 | 62:21 63:21 70:7 72:17 82:17 84:3 86:13 92:22 | 85:22 86:7,15,16 105:2 106:8 159:7 162:7,12 171:3 176:14 182:18 187:4 189:19 190:2,8 237:6,10 248:6 317:11 352:15 496:20 497:9 |
| extract 250:14 328:3 | factual 466:3 | family 83:17 187:4 187:5 190:8 216:12 217:10 334:21 401:5 455:10 456:6,16 491:10 506:3 520:1 | 118:20 119:17 125:14 158:7,7 182:16 216:15 363:16 425:2,8 428:19 480:12 490:2 508:14 511:2 512:5 513:6 513:17 514:3,3 519:22 521:7,22 | farther 261:21 fascinated 84:9 fascinating 261:8 fashion 14:16 129:3 448:17 fast 64:1 250:16 276:11 479:8 fasted 76:17 faster 61:5 252:7 276:8 fastest-growing 454:18 fate 408:15 fateful 481:8 father 486:13 fatty 101:14,15,20 fault 402:15 444:22 fauna 83:16 favor 175:14 425:5 favorable 328:8 favorite 344:17 Favre 1:18 38:13 42:1 79:10 85:16 89:1,17 90:12,16 91:13 92:9 98:2 107:15,17 108:22 109:2,5,10,14 115:15 131:12 133:6 146:8,19 165:18 166:1 191:8 192:11,22 257:13 258:10 260:4 415:12 417:7,15,21 418:8 418:12,15 428:14 428:17 474:12 477:3 FDA 142:11 257:7 |
| extraordinary 306:15 | faculty 178:13 179:19 | fans 159:14 | farmers 68:17 83:4 100:9 106:13 117:15,22,22 119:1 125:20 145:20 162:12,13 167:3 216:16 218:22 294:16,16 294:17 360:16 361:18 368:7 379:18 382:19 388:14 394:4,8 395:17 397:3 453:13 456:16 464:9 491:10 493:1 494:22 495:7 508:5 509:3 510:5,10 512:4 513:2 516:12 517:7 | |
| extrapolate 255:1 | failed 326:7 | far 54:7 57:1 115:9 115:11 121:10 124:4 132:19 135:6 157:5 205:9 209:8,14 217:7 219:15 257:6 270:20 285:10 292:8 360:6 361:20 376:12 491:17 | | |
| extrapolating 245:8,10,13 | failing 487:14 | farm 46:17 47:5 51:10,15,16,20 52:11,12,16,18,20 52:22 53:5,8,12 54:2,9,14,18,20 58:1,9 59:15,20 63:7,9 80:7,12,19 80:22 81:2,9,14 83:7,8,11,13,15 83:20 84:6,13,16 85:14 86:9,10,11 105:9 106:10 156:12 174:12 175:2 187:5 190:20 216:12,13 220:6 243:19 295:7 320:8 359:6 362:10 396:18,18 398:14 493:4,10 494:21 496:1,3,8 497:3 511:17 513:14 515:15 | | |
| extremely 119:1 213:13 256:5 270:17 429:20 | fails 505:5 | farmers 68:17 83:4 100:9 106:13 117:15,22,22 119:1 125:20 145:20 162:12,13 167:3 216:16 218:22 294:16,16 294:17 360:16 361:18 368:7 379:18 382:19 388:14 394:4,8 395:17 397:3 453:13 456:16 464:9 491:10 493:1 494:22 495:7 508:5 509:3 510:5,10 512:4 513:2 516:12 517:7 | | |
| ex-NOSB 317:12 | failure 135:4 443:9 | farmer's 386:21 | | |
| eyes 59:1 494:17 | fair 107:19 111:2 270:21 295:4 | farmer-friendly 371:15 | | |
| e-Organic 197:19 | fairly 98:10 131:15 166:8 202:2 206:19 248:2,11 250:15 251:2 252:5 258:1,16 268:11 270:9 272:18 275:18 276:3 330:5,7 341:5 | farming 51:13 52:18,20 66:10 164:22 226:6 351:5 375:14 396:4 425:2 490:17,19 491:12 493:6 494:1 499:14 510:11 520:6 | | |
| F | | | | |
| face 367:22 368:7 428:22 443:8 480:8 | fairness 316:11 | farmed 102:20 103:2,6,11 | | |
| faced 481:21 | fair-minded 317:17 | farmer 46:5 51:15 51:15 56:3 58:2,7 | | |
| facilitate 14:5 23:15 236:6 | faith 295:3 345:12 402:20 427:19 | | | |
| facilitated 112:5 | faithful 99:20 | | | |
| facilities 49:5,8 73:11 | Falen 392:16 490:13 495:16,18 495:20 500:11 | | | |
| facility 73:14 80:6 265:3 | fall 25:2 26:9 49:6 190:6 191:10 320:11 410:9 416:4 488:9 | | | |
| facing 231:14 | Fallon 392:16 | | | |
| fact 41:7 72:12 101:16 103:15,21 114:15 120:16 124:22 143:21 144:21 181:8 189:11 199:22 226:4 236:8,11 296:9 337:1 340:3 340:18 363:4 426:20 430:21 443:5 444:9 473:1 475:16 483:6 | fallowed 52:1 | | | |
| factor 154:10 155:12 | fallowing 52:2,9 71:18 73:21 | | | |
| factors 228:11 279:5 295:12 306:13 | falls 158:10 209:15 417:2 518:8,10 | | | |
| facts 96:2 300:4 | false 346:13 | | | |
| | familiar 22:16 64:10 228:2 335:7 418:17 421:13 422:19 472:3 | | | |
| | families 237:6 293:21 402:14 455:8 464:13 | | | |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| fear 138:5 389:16 443:20 | feel 31:9 134:6 145:5 156:3 162:1 162:16 165:7 166:17 190:14,20 265:2,7 266:19 283:13 284:4,10 385:15 386:4 435:2 450:18 452:1 484:5,11 486:13 489:1 499:8 | 317:17 375:3 412:18 487:7 | financial 443:8 | 227:18 228:9 246:15,18,22 247:3,6 248:18,22 253:1,12 262:21 263:9 264:10,17 266:10 267:8 272:19 273:1,8,22 276:6,15 282:13 287:13 289:15 290:7 292:10 294:3,9 295:11 296:8 301:20 326:11 352:13 353:3 355:19 356:1,5 360:20 361:3,4,6,21 362:9,15 363:3,8 366:20 367:15 369:1 370:21 371:7,10,21 381:7 381:14,18 382:8 388:17 389:12 393:5 394:1,5,13 395:13 398:22 405:6 407:18 411:8,15 414:6 422:20 426:17 427:3 429:1 443:13 449:12 455:14,22 470:6,8 470:15 471:17 479:3,11,13 480:15,22 481:6 485:13 488:14 498:3 508:9 509:12 510:7 511:9 |
| feasibility 48:8 382:3 | feeling 246:4 247:4 247:15 272:16 278:10 | female 55:12 | financially 512:10 | |
| feather 155:2,3,4 155:22 156:2 158:10,12,14 189:20 | feels 35:20 | fence 54:1 | find 15:5 55:7 101:20 133:4 163:12 165:8 176:9,21,22 183:5 183:11,15 206:15 221:4 265:6 346:3 348:18 366:13 367:5 378:8 401:4 421:8 425:21 432:9 461:10,10 462:2 465:19 471:8 472:20 488:19 492:6 | |
| feathers 158:15 159:17 183:1,5 | feet 5:22 236:16,17 518:11 | fermentation 205:21 318:10 323:16 328:2 | finding 96:14 180:9 302:22 389:5 421:21 432:7 450:21 | |
| feather-picking 184:7 | Feldman 1:18 12:12 18:9,15 32:16 38:3,15 40:5,8,12 42:4 139:4 140:18 177:4,9 193:7 196:16 204:3 215:21 228:16 242:18 249:15 268:18 269:16 274:18 278:15 279:17 280:1,4,13 281:11,21 283:4 284:6 285:12 286:9 305:16 310:16 313:5 314:14 315:14 326:4 364:10 374:13 384:2 385:3 390:9,19 418:17,21 419:3 419:15 421:12 422:8 427:14 428:10 438:6 450:11 451:14,19 452:8,18 484:10 514:19 522:13 | fertility 362:1 | findings 119:9,11 219:4 | |
| fecal 237:7 | | field 68:21 69:9 80:17 97:5 223:12 226:19 240:19 250:2 305:5 309:4 351:1 419:10,12 468:15,19 508:3 508:10,12,14,16 508:19 510:4 | finger 82:4 473:5 | |
| fed 59:19 61:14 150:18 175:12 187:15,18 189:12 | | fields 97:18 239:8,9 307:19 309:1 | fine 8:18 11:14 137:8 194:12 472:18 | |
| federal 11:11,16 230:18 302:6 308:7 332:19 333:5 | | field-tested 381:12 | finfish 50:6,12 51:3 53:11 55:17 56:2 58:18 69:19,21 71:9 76:19 82:8 86:5 168:11 175:8 | |
| feed 46:2,8 49:4,7 56:8,10,11,15,19 57:5,15,18 58:1 63:18 67:9 81:12 89:12,12,16 105:3 111:21 112:3 141:2 154:3 155:9 160:18 166:10,15 168:20,21 169:15 171:22 172:1,11 173:5,6,13 175:12 183:7 185:21 189:6,13 190:14 190:15,16 234:8 236:22 237:4 402:14 431:4 439:9,9 458:15 493:18 | | FIFRA 332:18 | finger 82:4 473:5 | |
| feedback 16:1 17:4 21:1 40:1 122:16 128:9 192:16 356:19 | | fifth 113:1 332:5 | fingers 202:9 | |
| feeding 57:10,22 60:7 189:5 | | fight 6:2 247:8 402:16 455:14 | finish 200:11,19 201:11,12 253:8 281:19 328:21 359:4 439:19 450:10 477:10 | |
| feedlot 165:1 | | figure 141:11 179:5 349:5,7 472:15 | finished 9:10 94:20 213:18 307:11 419:22 | |
| feeds 61:17,18 67:13 78:20 82:19 | felt 61:9 98:3 100:9 100:20 257:8 287:8 288:14,18 | figured 402:2 | firm 432:20 | |
| | | figuring 192:7 | firmly 381:11 | |
| | | file 104:18 | first 22:13,17 26:8 36:19 47:15 78:22 92:1 100:15 102:10 108:10 109:7 127:16,20 133:10 150:3 160:1,19 169:1,22 174:2 178:9 | |
| | | fill 155:16,17 227:12 | | |
| | | filled 60:18 502:3 503:13 | | |
| | | fills 348:1 | | |
| | | filtering 35:15 | | |
| | | final 33:8 45:8 48:19 49:11 68:14 89:8 206:5 274:18 444:4 | | |
| | | finalized 25:22 | | |
| | | finally 62:4 145:18 171:20 212:21 241:17 332:5 445:21 | | |

| | | | | |
|-------------------------|----------------------------|----------------------------|------------------------|----------------------------|
| 186:19 197:6 | 431:3,3 | 228:20 230:21 | 383:16 386:6 | 514:10 517:5 |
| 202:6,13 207:1 | fisheries 46:12 | 347:2,7 408:13 | following 15:19 | FoodNet 230:4 |
| 208:7 211:4 213:4 | 173:8 174:19,20 | 519:18,19 | 39:19 289:12 | foods 13:16 55:4 |
| 221:17 243:10 | 175:22 | flourish 5:17 502:9 | 401:5 451:2 | 108:7,9,10 111:5 |
| 246:10 248:13 | fishery 67:16 | flow 109:3 220:22 | 468:12 486:17 | 111:5,13,16 113:6 |
| 252:9 275:7 | fishing 169:9 | 414:16 | follows 19:7 | 113:10,11,13,22 |
| 284:14 310:10 | fit 273:21 | flower 212:2 | follow-up 260:5 | 114:6 115:3 135:9 |
| 313:7 317:5 | fits 121:3,4 | 266:14 275:10,11 | 417:7 | 150:10 151:22 |
| 323:11 331:13,16 | five 44:20 60:15,19 | flowering 203:7,9 | food 5:13 46:16 | 152:3 308:6 430:1 |
| 333:10 337:8 | 63:13 67:4 76:4 | 203:12 405:18 | 47:7 55:21,22 | 433:17 453:17,20 |
| 342:9 343:6 | 77:6 95:4,6 107:2 | flowers 199:7 | 60:11,12 101:9 | 492:10 |
| 349:16 350:12 | 107:3 156:4,12 | 208:22 211:7,10 | 108:2,5,12 109:19 | food-borne 230:5 |
| 352:10 355:10 | 188:19 230:22 | 212:15,18 214:3,4 | 109:19 110:1,17 | foothold 327:21 |
| 387:9 388:20 | 235:9 281:2 | 214:11,19 248:1 | 112:11 113:18 | footnote 176:17,18 |
| 414:8,14,19 | 289:18 310:1 | 263:9 264:18,19 | 114:17,21 115:5 | footnotes 168:5 |
| 442:17 473:19 | 331:14 343:19 | 265:3 267:5 | 134:4,9,14 135:18 | forage 173:8 |
| 474:12 481:6 | 366:17 387:10 | 275:16 277:2 | 138:8,22 139:7 | 175:21 |
| 487:8 505:22 | 396:2 399:8 400:6 | 278:14 405:17 | 141:16,20 142:7 | foraged 169:15 |
| 509:6 515:15 | 400:11 406:5 | flows 59:17 61:19 | 143:19 144:3,15 | 172:7 175:12 |
| 523:4 | 410:15 411:5 | fluid 206:3 | 145:9,12,19 | forbearance 98:3 |
| firsthand 190:10 | 423:11 447:17 | fluke 508:21 | 146:10 149:22 | Force 141:20 150:1 |
| 244:4 | 451:8 455:18 | focus 353:4 354:9 | 150:3,5,15 151:9 | 186:17,22 187:10 |
| fish 52:21 53:3 | 465:2,4 466:15 | 376:3 434:9 497:4 | 152:16 153:2 | 188:3,8 |
| 56:14,14,15 57:19 | 476:7 483:1 | 497:11 501:8 | 161:18 162:1,7 | forced 82:18 95:5 |
| 57:20 58:19,22 | 493:10 511:3 | focused 69:17 | 164:11 165:2 | forces 369:1 |
| 59:5,22 60:6,7 | five-page 168:4 | 148:4 222:14 | 167:16 174:7 | forcing 83:4 |
| 61:11 64:6,11,13 | Flamm 11:21 93:6 | 226:10 244:1 | 182:7 193:2 216:2 | forefront 264:11 |
| 64:15,18 65:2,9 | flat 420:12 | 351:7 436:3 | 217:22 218:1 | forego 394:6 400:1 |
| 65:21 67:14,17,18 | flavor 234:4 454:22 | 508:12 | 229:19 230:11,14 | foreground 53:8 |
| 67:20 68:2,8,8,9 | flawed 29:16 | focuses 204:19 | 230:15,22 231:2 | 64:18,22 |
| 68:10,11,13 69:18 | Fleming 504:8 | 454:8 | 295:8,9 297:4 | foreign 63:6 112:18 |
| 69:22 72:3 73:7 | flexibility 377:1 | focusing 489:13 | 298:11,18 330:14 | 129:10,15 |
| 76:8,16 77:6,12 | flexible 96:19 | Foley 118:13 | 330:15 332:19 | Forelles 462:14 |
| 81:12 82:9,9,22 | flies 337:13 | foliar 325:12 | 333:6 344:20 | forerunner 230:1 |
| 82:22 84:12,16 | flips 308:13 | 328:13 | 345:19 346:4,8 | forged 168:21 |
| 87:8,9,11,12 88:2 | flocks 188:22 | folks 71:9 91:10 | 347:5 349:19 | 175:18 |
| 95:12,15,18,20,21 | flood 73:12 | 122:22 128:7,13 | 365:15 368:15 | forget 179:15 |
| 96:5 99:16 101:9 | floods 400:21 | 149:6 269:11 | 386:11 387:12 | forgive 159:7 |
| 101:9,10,10,14,21 | floor 60:11 158:14 | 415:7 432:4 | 388:6 419:22 | forgot 109:12 |
| 102:2,5 105:9 | 158:16 243:5 | 433:15 474:14 | 429:17 430:10 | 275:7 |
| 168:15,22 169:15 | 286:10 | 515:4 519:6 520:9 | 431:15 433:13 | form 57:14 207:7,8 |
| 170:5 171:14 | flop 64:21 | follicle 155:22 | 436:4 438:7,10 | 207:10,15 224:3 |
| 172:7,9,16 173:14 | flora 83:16 240:16 | follow 27:22 117:8 | 440:15 464:13 | 298:19 305:19 |
| 173:21 174:12,14 | 241:19 261:13,17 | 197:3 252:20 | 491:9 493:8,12 | 312:3 379:4 |
| 174:16 175:3,13 | 328:11 345:1 | 316:11 399:2 | 494:12,14,19,20 | formal 442:2 |
| 175:17,18,21 | floral 509:14 | followed 150:7 | 500:19 505:14 | format 371:16 |
| 338:6 372:19 | Florida 65:14 | 366:17 372:22 | 511:17 512:12 | formation 76:13 |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 329:2 335:3 336:13 formats 378:21 414:22 formed 413:17 former 149:14 formerly 46:4 forms 132:12 175:2 formula 136:12 150:16 formulas 143:12 formulate 144:5 formulated 137:6 formulating 136:21 137:16 143:19 formulation 56:19 135:19 143:7 200:6,7,8 201:22 202:16 206:10 250:15 273:17 333:8 formulations 144:3 273:18 322:3 formulators 137:15 142:20 145:2 formulized 137:10 forth 18:11 27:17 41:11 67:18 69:15 94:7 135:11 375:15 423:6 forthcoming 26:12 fortunately 323:17 fortune 508:2 forum 24:7,14 forward 32:10 68:20 102:15 121:15 123:10 142:17 145:1 168:7 245:9,18 285:7,8 287:6,10 289:9 302:20 352:1 357:6,12 364:14 382:18 385:17 397:9 413:21 457:6 foster 1:19 12:12 31:14 33:16 38:18 | 40:15 42:7 176:6 176:20 177:2 225:7 249:17 251:8,13 268:19 271:22 314:15 352:1 378:12,16 403:4,12 448:12 448:15 517:13 518:5,9,13,21 519:5,10 fostering 490:1 fought 399:6 426:14 found 10:13,15 53:19 208:6,9,14 209:1,20 210:5 211:13,19 213:12 234:13,17,22 235:8 239:5 246:18 254:5,20 256:12 268:1 348:6 410:21 421:3,22 433:11 433:12,15 465:15 492:9 495:20 foundations 350:22 Founded 379:16 founding 186:16 454:4 four 9:19 20:15 31:10 54:4 63:12 75:7 138:16 145:5 154:2,2,7 155:1 163:21 167:22 196:21 198:18 209:3,6 230:14 236:16 257:17 266:13 267:3 332:2 343:19 347:15 352:13 359:4 402:6,22 403:9,13 447:17 465:3,4 469:11 470:7,14 471:1 478:13,13 483:1 fourth 182:15 Fox 347:7 | foxes 32:1 FRAC 322:9 FRAC-19 312:17 frame 19:20 24:22 25:8 296:18 331:3 352:13,21 383:20 416:18 426:9 461:2,12 462:1 478:20 Francis 1:23 36:18 147:3 174:22 328:20 338:18 363:13 446:16 477:9 Francisco 468:1 frank 92:18 frankly 8:7 57:2 94:8 457:20 fraud 102:4 free 410:12 freeze 207:14 frequent 421:1 fresh 66:10 144:5 293:15 398:18 494:12 Friday 433:10 friend 141:11 426:2 friends 138:6 178:7 front 128:3 130:17 131:2 163:17 317:1 485:4 494:17 frontier 95:17 96:4 frost 470:22 480:10 frown 249:10 froze 275:20 frozen 55:5,6,6 fruit 200:11,19,22 201:1,3,7,11,18 211:7 213:13,16 214:3,4 215:2,3,8 215:9,11,13,17 218:5,17 223:15 225:18 227:2,3 228:4 244:5 249:3 249:6 253:8,14 | 254:3,10,12,18 255:6 256:20 260:8,14,17 262:16,19 278:14 293:17 300:5 303:2 305:7,13 307:11 320:3,7 321:7,9,14,22 322:15 323:5 326:16 345:14,16 348:8,16 359:18 366:6,16 368:11 369:9,12,14,15,19 369:22 381:10 382:11 385:20 388:17 390:6 394:10 397:18 400:2 404:1 407:7 409:16,19 410:12 410:13,19 413:16 415:19 416:2,19 416:20 417:2,5 421:9 423:15,17 424:1,4,10,11,15 424:17 427:9,16 427:22 428:18 441:21,22 442:19 443:4,10 446:5 448:5 454:12 455:7 463:11 464:17 480:1 481:19 482:11 483:7,14 485:1,11 491:6 513:17 516:20,20 fruiting 399:8 fruits 201:14 298:8 453:11 478:5 frustrated 343:21 FSIS 229:22 230:2 Fujis 374:5 fulfilling 395:10 full 62:15 143:17 188:21 284:18 285:4 290:11 296:4 318:4 370:7 387:11 389:18 | 390:2 403:4 457:21 487:9 fully 132:8,13 324:14 368:1 408:6 510:14 full-blown 481:15 full-time 359:9 361:17 Fulton 167:12 178:3,4,5,7 181:17 182:9 FULWIDER 1:19 38:20 42:9 159:2 fun 459:14 function 326:6 functional 114:14 Fund 45:20 fundamental 98:1 170:16 fundamentally 50:1 335:19 487:19 funded 187:13,22 188:3 191:18 412:10 funding 230:18 413:8 fungai 311:4 312:14 328:10,14 328:18 333:18 339:6 fungi 276:18 312:19 325:7,8 326:1 329:3,5,10 329:14,19,22 330:15 337:5 339:2 499:3,3 fungicide 308:8 312:1,13,17 326:1 326:21 fungicides 318:19 327:13 499:2 funginistic 312:2 312:17 fungistatic 312:18 fungus 276:19 336:14,15 400:21 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| further 38:7 40:14 49:3 96:15 108:1 120:14 131:16 232:1 271:13 287:15 289:21 296:20 300:1 304:8,18 310:13 315:18,22 334:10 352:16 395:3 444:13 501:15 | generation 182:15 216:12 237:20 467:21 generic 298:18 generous 209:6 genes 206:11 210:11 212:6 214:13 215:13 232:2,13,15,20 233:2,15 234:21 235:6,9 236:7,9 236:10,12 237:13 237:21,22 238:13 238:20 240:15,18 240:20,22 242:7,8 259:8,9,20 260:1 502:20,22 503:2 503:20 | 114:9 120:11 156:19 164:17 189:7 274:16 316:14 374:14 402:1 405:19 414:21 432:17 433:8 510:1 512:11 514:9 521:4 ghost-white 248:15 give 30:4 42:21 44:4 78:15 130:6 155:5 158:6,21 162:8,21 165:12 165:14 176:13 184:5 189:3 195:9 195:16 199:11 201:10 233:13,22 234:3 266:17 300:7 310:9,10 340:2,15 358:5 402:21 405:5 412:8 458:19 462:9 482:8 502:20 508:22 514:8 | global 123:15 129:12 134:2 270:16 271:5 380:9 gloss 497:15 glutathione 475:7 gluten 147:16 153:1 GMO 120:4 121:3 126:10 130:21 GMOs 26:8 Gnaw 6:4 go 10:4 12:22 45:14 55:5 58:22 59:15 62:12 66:4 68:14 70:15 78:3 83:5 83:14,21 84:20 87:14 91:4 96:14 102:15 105:2 106:10 108:1 109:10 121:10 123:10 124:4 127:19 131:21 141:17,19 143:8 144:16 146:3 149:2 152:7 160:5 162:7 163:14 164:4 166:3,13 177:12 186:4 190:13 197:4 198:14 202:10 220:4 222:16 234:9 235:14 245:17 248:6 251:2 274:8 276:11 281:8,9 283:10 285:14 287:6 290:13 292:8 305:19 307:12 309:18 310:10,16 313:7 315:20 316:22 322:18 378:8 384:21 404:22 411:1 420:19,21 421:22 423:6 457:15 466:11 | 476:4 484:22 507:15 521:1 goal 191:2 297:2 303:4 321:21 350:14 421:7 480:19 510:12 goals 356:6 goat 130:1 goes 15:16 20:1 22:18,20 60:13 83:13 136:21 141:7,8 144:14 148:10 159:15 161:5 171:7 221:9 221:19 252:13 278:16 281:5 346:22 405:12 476:20 484:5 Goff 278:2 going 6:15,21 7:9 8:5,11 9:5,17 12:22 13:4 22:9 32:5 34:12,16,20 35:5,7,12,13 36:6 36:19 40:8 43:4 46:21 49:14,19 61:6,22 62:20 65:8 81:6 85:3 86:14 88:13 89:2 89:4,9,14 91:7 101:2,19 102:2 107:8 108:13 109:6 116:5 120:2 124:3 127:2 128:21 129:20 131:15 134:15 137:8,18 138:8 140:21 142:5,21 151:5 155:16,17 159:7 162:6 163:12,20 164:10 164:14,17 165:7,9 168:1,7,13 169:21 172:13,14 173:12 176:21 179:2 181:10 182:8 190:2 193:1 194:9 |
| G | | | | |
| G 3:5 4:1 gain 340:3 Galas 373:6 374:5 garden 6:4 gardener 6:17 gate 36:20 gather 26:14 gavel 315:15 gears 87:18 geez 477:6 gene 104:21 210:22 212:19 215:7 232:12,13 235:13 237:17 241:8,8,18 261:4 306:17 genera 235:2 general 11:3 117:19 122:11 123:1 140:7 154:12 185:19 186:12 294:20 298:6 315:8 329:12 361:20 488:21 generally 8:14 210:13 232:15 442:22 483:10 generate 419:6 generated 14:19 | genesis 142:4,12 genetic 122:8 174:10 238:5 245:2 259:6 genetically 66:22 120:6 125:1 180:4 Geneva 443:15 genome 122:3 genomes 121:19 gentlemen 44:4 153:11 geographic 111:11 geography 462:21 George 43:11,12 44:15 49:21 78:9 79:8 92:12 93:2 161:15 167:11,15 177:4 178:2 275:16 430:10 George's 276:1 520:18,22 Georgia 133:19 geothermal 517:18 517:20 Gerald 317:5,8,11 323:15 German 199:17 getting 33:6 36:12 90:4 93:11 94:3 | 114:9 120:11 156:19 164:17 189:7 274:16 316:14 374:14 402:1 405:19 414:21 432:17 433:8 510:1 512:11 514:9 521:4 ghost-white 248:15 give 30:4 42:21 44:4 78:15 130:6 155:5 158:6,21 162:8,21 165:12 165:14 176:13 184:5 189:3 195:9 195:16 199:11 201:10 233:13,22 234:3 266:17 300:7 310:9,10 340:2,15 358:5 402:21 405:5 412:8 458:19 462:9 482:8 502:20 508:22 514:8 given 25:2 28:16 30:13,16 122:7 124:17 128:9 206:21 226:4 238:12 244:14 245:19 260:19 305:20 343:22 360:18 367:13 369:7 382:7 430:12 436:7,12 450:21 gives 50:19 289:4 339:12 341:16 363:6 504:21 giving 49:14 294:17 398:16 496:17 519:8 glad 128:6 179:22 381:16 446:14 Glenn 228:17 271:22 | global 123:15 129:12 134:2 270:16 271:5 380:9 gloss 497:15 glutathione 475:7 gluten 147:16 153:1 GMO 120:4 121:3 126:10 130:21 GMOs 26:8 Gnaw 6:4 go 10:4 12:22 45:14 55:5 58:22 59:15 62:12 66:4 68:14 70:15 78:3 83:5 83:14,21 84:20 87:14 91:4 96:14 102:15 105:2 106:10 108:1 109:10 121:10 123:10 124:4 127:19 131:21 141:17,19 143:8 144:16 146:3 149:2 152:7 160:5 162:7 163:14 164:4 166:3,13 177:12 186:4 190:13 197:4 198:14 202:10 220:4 222:16 234:9 235:14 245:17 248:6 251:2 274:8 276:11 281:8,9 283:10 285:14 287:6 290:13 292:8 305:19 307:12 309:18 310:10,16 313:7 315:20 316:22 322:18 378:8 384:21 404:22 411:1 420:19,21 421:22 423:6 457:15 466:11 | 476:4 484:22 507:15 521:1 goal 191:2 297:2 303:4 321:21 350:14 421:7 480:19 510:12 goals 356:6 goat 130:1 goes 15:16 20:1 22:18,20 60:13 83:13 136:21 141:7,8 144:14 148:10 159:15 161:5 171:7 221:9 221:19 252:13 278:16 281:5 346:22 405:12 476:20 484:5 Goff 278:2 going 6:15,21 7:9 8:5,11 9:5,17 12:22 13:4 22:9 32:5 34:12,16,20 35:5,7,12,13 36:6 36:19 40:8 43:4 46:21 49:14,19 61:6,22 62:20 65:8 81:6 85:3 86:14 88:13 89:2 89:4,9,14 91:7 101:2,19 102:2 107:8 108:13 109:6 116:5 120:2 124:3 127:2 128:21 129:20 131:15 134:15 137:8,18 138:8 140:21 142:5,21 151:5 155:16,17 159:7 162:6 163:12,20 164:10 164:14,17 165:7,9 168:1,7,13 169:21 172:13,14 173:12 176:21 179:2 181:10 182:8 190:2 193:1 194:9 |

| | | | | |
|---------------------------|--------------------------|---------------------------|----------------------------|---------------------------|
| 199:21 203:17 | 182:9 184:3 | 206:19 | greatest 456:18 | 169:11 291:13 |
| 226:8 240:1 | 185:14 196:7 | gradual 255:17 | greatly 44:18 64:12 | 292:19 297:10 |
| 243:14,15 244:17 | 200:13 220:19 | graduate 501:2 | 503:7 | 302:3 356:13 |
| 250:22 252:2,10 | 226:5 257:5 | grain 95:19 112:18 | green 22:18 141:7 | 357:10 358:1,6 |
| 252:11 253:11 | 265:12 268:4 | 112:18 138:15 | 316:15 341:17 | 432:13 491:14 |
| 256:13 257:19 | 273:13,20 275:19 | 216:13 359:10 | greenhouse 320:8 | 492:7 501:10 |
| 260:12 262:15,16 | 295:3,5 305:10 | 512:7 | greenhouses | Group's 93:8 |
| 263:22 267:11,13 | 317:10 330:17 | grains 135:20 | 517:20 | Grove 359:6 |
| 268:15 271:2 | 331:8 335:12 | 425:9 | Greenness 380:10 | grow 5:10,19 61:4 |
| 274:13 275:4,4 | 341:22 348:3 | Granatstein 397:21 | grew 216:12 398:10 | 62:3 66:20 72:14 |
| 277:1,6 278:11 | 355:5 365:12 | 398:4 404:21 | 487:16 | 73:19 74:3 88:21 |
| 281:13,14,19 | 370:14 372:20 | 406:22 407:2,4 | Grimmway 317:11 | 89:16 95:20 |
| 291:13 299:1 | 388:11 390:3 | 412:2,5,16 413:10 | 318:6 | 157:18,19 175:19 |
| 305:19 313:7 | 397:13 402:19 | 413:15 414:5 | grocers 380:4 | 205:22 283:22 |
| 314:17 316:8,9,10 | 403:7,17 441:18 | 415:5,18 417:11 | grocery 201:1 | 293:16 294:21 |
| 316:12 325:22 | 443:4 446:15,18 | 417:17 418:3,11 | 380:19 | 368:4 377:17,19 |
| 326:12 328:6 | 449:9 464:13 | 418:14,20 419:1 | gross 462:19 | 380:20 389:12 |
| 335:5 336:10 | 467:20 471:3,4 | 419:14 421:6 | ground 175:20 | 396:5 425:16 |
| 342:5,7 359:2,3 | 474:10 475:7 | 422:3,18 423:22 | 183:6 186:3 247:3 | 479:22 488:1,3 |
| 364:10 376:15 | 490:10 495:18 | 424:13 | 247:21 329:16 | 511:12 516:20 |
| 384:3 395:8 | 497:13 500:7,9,15 | grant 230:18 490:1 | 354:4 382:2 415:7 | 517:14,22 518:17 |
| 400:17 402:2 | 508:2 510:15 | granted 300:12 | 442:16 475:21 | grower 46:7 225:20 |
| 404:8 406:7 410:5 | 514:5 515:4 | 479:19 | 518:18 521:6 | 251:20 266:5 |
| 411:12 413:7 | 519:12,13 520:10 | grants 156:19 | group 3:13 21:8 | 278:3,4 291:18 |
| 426:1 430:6,7,11 | 522:20 | grape 284:22 | 43:13,13 44:13,16 | 292:11 299:8 |
| 431:9 432:19 | Goodman 347:1 | grapevines 5:9 | 45:11 48:7,12,13 | 304:22 318:16 |
| 435:6,7,12,13,14 | Goodness 380:10 | graph 408:16 | 48:16 56:17 68:19 | 320:13 355:14,21 |
| 438:3 460:20 | Gorski 345:8 | grapple 493:5 | 69:14 78:5,9 91:1 | 357:18 398:18 |
| 475:5,5 481:14 | gotten 102:11 | grappling 88:6,13 | 91:6,9 92:13 94:7 | 399:1,22 456:13 |
| 485:15 506:11 | 132:20 267:9 | grass 186:4 225:9 | 94:11 98:21 99:22 | 457:1 458:22 |
| 509:3,16 516:3,7 | 285:13 371:6 | gray 324:13 | 106:4 118:11 | 467:22 471:20 |
| 516:9 520:8 | 378:18,19 402:16 | great 59:9 66:19 | 119:6 120:10 | 481:12 498:2 |
| 522:11 | 483:9 | 90:5 108:19 | 123:2,11 126:9,13 | growers 50:12 |
| gold 151:14 | Gottlieb 347:12 | 128:12 130:6 | 127:7 128:5 | 159:6 219:9 221:5 |
| Goldburg 45:19 | governance 169:20 | 141:2 179:17 | 130:11,12 131:4,5 | 266:3 272:5 274:9 |
| good 5:1 7:5,6 9:8 | government 67:15 | 233:3 270:7 342:2 | 131:7 132:5,7 | 276:5 284:22 |
| 13:3 22:15 31:22 | 112:2 346:12 | 365:8 371:13 | 141:14 142:19 | 290:3,17 293:18 |
| 37:17 41:2 43:1,1 | 501:10 521:8,11 | 429:13 434:19 | 149:14 182:1 | 293:20 294:21 |
| 43:2 64:6 71:15 | 521:11 | 453:11 454:22 | 186:22 190:8 | 296:17 299:11 |
| 76:18 77:20 | governments | 459:2 460:6 461:1 | 191:22 192:2 | 303:3 304:19 |
| 106:21 109:13 | 129:15 | 465:20,21 466:9 | 211:9 218:3 249:3 | 305:5,11 319:8 |
| 125:9 131:13 | governor 451:22 | 467:14 473:6 | 379:22 385:14 | 320:3 339:15 |
| 144:18 153:10,10 | Gowan 200:5,6 | 480:20 484:8 | 407:7,14 413:16 | 340:2,15 344:5 |
| 154:16 163:7 | 271:22 | 490:9 522:16,22 | 429:19 431:21 | 351:8,15 353:5 |
| 165:7 167:13 | Gowan's 200:8 | 523:1 | 441:22 454:3 | 354:17 358:12 |
| 169:20,20 178:4 | 271:20 | greater 237:7 | groups 81:22 | 361:10,13,16 |
| 180:18 181:3,17 | grade 205:20 | 369:10 496:11 | 132:13 169:10,10 | 362:3,22 363:6 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 364:7,17 367:4,22 368:17,20 369:1 372:1,7,9,10,11 372:13,17 373:21 374:19,22 375:1,1 376:20 377:2,3,9 379:6 381:12 383:10 387:19 388:11 389:1,9,11 390:1,11,15,18,20 391:2 398:15 399:19 400:19,20 401:10 402:6,9,11 402:15,17,19 403:15 404:15,15 407:20 412:20 414:22 415:10 416:15 420:16 426:12 442:1,5,19 442:22 444:20 445:1,2 446:13 447:5 448:20 449:3,7 455:5,12 476:11 478:9,12 479:1 480:3,7,13 480:18 481:5,10 481:21 490:22 491:1,8 493:5 494:4 496:16 497:4,8,15 510:14 519:18,19 522:3 grower's 295:20 growing 5:8 55:1 60:3,20,21 61:6 61:10 62:13 63:15 64:18 65:5,15,20 70:6 74:9 75:1 90:10,19 96:9 105:12 116:13 180:10 251:14 253:14 255:22 297:5 368:4 373:21 375:14 382:4 389:4 410:15 444:12 494:19 509:15 512:6 | grown 46:15,17 54:16 60:10 62:15 84:13 228:6 247:5 291:6 302:14 303:14 305:7,13 379:15 386:3 393:14 425:14 482:1 485:11 511:17 grows 62:16 320:8 growth 6:19 46:20 54:17 72:10,18 145:18 160:12 206:12 276:18 336:15 337:5 396:15 438:8 454:16 501:21 502:11 guarantee 190:21 guess 8:6 89:14 92:8,19,20 94:3 105:9 112:22 115:13 127:6,15 135:20 136:18 137:11 139:10 140:20 198:3 202:8 203:5 216:6 235:17 243:1 247:13 249:21 251:1,6 258:19 260:4 266:19 278:18 283:6 365:1,5 424:8 428:7 452:2 463:22 guidance 7:14 10:6 20:11 102:14,17 103:6 guide 8:1,12,17 9:7 10:6,16 12:17 32:15 37:22 91:6 guidelines 47:2 150:4,5 159:10 162:11,18 321:13 guiding 492:2 gummy 340:12 gut 344:22 347:10 | 457:21 gutful 491:22 guys 159:13 165:11 179:3 191:11 277:22 296:19 310:3 459:18 465:13 476:17 520:17 <hr/> H <hr/> habitat 63:11,14 174:6 hail 423:21 424:5 424:15 444:16 hailed 423:15,17 424:1,10 476:18 hails 476:1 hailstones 424:3 hailstorm 203:15 411:8 451:8,9 473:18 475:17 476:8 hailstorms 480:10 Hain 21:7 half 5:21 46:16 197:3 234:12,15 264:22 314:16 330:3,10 331:5 361:17 410:3 416:10 475:10 476:10 511:3 hall 523:15 hallway 194:11 Hancock 133:10,13 139:16 144:9 hand 252:4 313:4 468:22 handle 79:22 138:12 156:10 399:13 handled 80:8 268:21 handlers 26:15 219:22 365:21 486:6 handling 108:17 115:11 232:5 | 387:5 hands 232:4 hands-off 191:19 handwritten 485:4 hang 267:9 hangs 51:4 happen 6:14 105:8 142:21 212:2 259:22 268:15 344:4 385:2 414:1 417:20 435:8,12 441:17 448:1 476:16 502:22 509:10 518:19 happened 94:9 154:8 257:12 288:8 384:13,16 397:20 476:10 happening 5:20 50:2 84:5 391:16 413:18 429:12 430:21 438:21,22 happens 57:21 83:12 136:14 157:17 165:4 209:14 233:3 238:12 241:20 276:8,10 338:2 389:3 421:7 happy 62:21 87:10 181:2 355:8 370:18 398:14 432:9 460:1 482:12 hard 51:11 97:12 191:1 201:13 324:2 339:17 342:20 362:3 391:6 411:18 435:6 455:22 491:20 520:17 521:2,3 harder 146:18 251:21 267:21 405:14 439:11 hardship 66:19 Hardy 45:22 56:17 | Hargreaves 46:3 harm 30:19 150:6 150:13 152:15 257:9 491:19 499:2 harmful 499:3 harmony 500:4 Harold 1:15 152:5 172:19 184:11 243:9 281:13 284:7 286:10 303:18 306:12 310:9,11,11 313:6 326:19 334:3 340:8 357:4 370:4 370:12 376:22 385:4 391:4 395:20 422:21 439:18 457:14 482:14 505:21 Harold's 281:14 286:6 harvest 6:19 59:5 63:21 341:3,12 359:19 392:11 410:12 416:2,5,14 416:17 417:16 480:15 harvested 74:15 75:12 254:9 324:10 harvesting 65:7,11 76:10 harvests 478:10 Harvey 167:21 173:10 hatch 55:14 hatchery 55:11,19 56:7 67:8 75:2 hauled 64:11 hauling 64:6 Hawaii 59:20 hay 512:7 haystack 265:6 haystacks 266:10 hazard 229:20 461:19 462:6 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 464:4,7 466:6 467:7 hazardous 467:5 hazards 308:11,12 head 76:22 450:6 headed 116:8 heads 98:6 health 28:17 47:1 68:18 69:2 96:8 99:7 100:8 114:18 134:1 143:2 154:11 189:18 197:12 212:22 229:3,17 230:2 240:5 269:18 270:4 297:9,19 298:4 300:5 306:8 309:5 327:1,8 333:16 336:19 346:9 347:2 359:17 383:5 385:8 386:11 434:8 494:2 496:7 497:22 501:2,6 503:18 513:8,10 healthy 99:16 102:4 181:12 182:7 344:20 346:17 443:4 460:5 491:9 494:12 523:7 hear 12:19 21:3 33:10 115:20 167:7 190:10 319:17 345:20 406:12 435:5 446:18 461:22 470:9 484:3 518:13,22 520:11 heard 88:19 125:13 165:22 167:20 193:6 274:21 358:1,2 360:1 376:5 378:14 408:5 409:17 410:16 417:10 432:1 434:10 | 437:22 447:3 450:22 461:21 462:11,12,17 465:12,20 466:3 469:21 483:12 498:22 519:3 520:15 521:5 hearing 186:20 514:22 heart 81:20 135:3 136:20 151:4 155:21 491:15 hearts 146:2 heat 146:13 400:20 401:21 480:10 518:18 heated 517:20 Heath 380:10 heating 111:4 heat-tolerant 207:10 heavily 210:6,10 248:1 360:18 362:12 368:10 496:17 497:20 heavy 138:3 327:3 364:2 hectare 269:8 hedgerow 225:9 held 28:20 34:13 49:3 60:10 Hello 49:13 182:14 343:9 379:14 392:18 398:6 405:2 453:3 511:1 help 10:11 14:5,16 42:22 116:9 156:19 158:22 180:1 196:18 280:18 300:3,10 300:12 317:7 325:10 356:20 362:7 410:8 462:1 466:13 475:16 492:1 helped 78:2 323:12 387:4 | helpful 10:13,15 32:21 133:1 320:5 501:16 helping 461:2 467:15 helps 145:19 242:22 463:3 Hemlock 359:6 hen 32:1 henhouse 163:11 hens 182:17,20,22 183:4,13,16,19 herbivorous 168:15 177:16 Herbruck 178:3 182:12,14,15 184:9,16 185:4,13 186:1 herbs 517:22 herd 125:15 herpes 180:16 hesitate 95:3 436:10 hesitation 255:9 hey 439:20 515:20 Hi 27:8 161:16 186:11 348:4 350:4 386:19 415:12 429:16 439:20 478:2 507:16 hide 309:14 hiding 483:6 hierarchy 354:8 383:15 489:5 high 56:4 57:7 65:3 65:4 87:5 105:15 135:20 139:11,14 149:3 157:13 158:10 187:13 193:10 219:6 221:4 236:1 247:6 268:10 278:22 296:8 322:20 362:11 369:19 373:15 416:11 440:13 444:16,16 | 445:11 480:7 481:9 517:17 higher 113:5 136:22,22 154:20 179:18 184:2 189:5 237:10 362:15 423:19 496:10 highest 136:19 254:20 462:14 highlighted 489:22 highly 25:16 116:6 232:19 240:4 271:10 351:16 361:21 377:17 378:2 504:1 Hilton 1:10 507:6,7 hire 226:21 history 97:3 121:10 133:16 141:18 154:6 169:5,6 217:14 281:17 288:7,11 hit 58:22 137:7 149:2 208:20 411:1 435:15 476:8 hits 137:6 465:15 Hm 423:22 hobble 482:4 hoc 48:12 121:3 130:21 132:6 hog 234:5 243:19 holding 197:20 holds 216:3 471:17 hole 155:15,17 holistic 135:15 157:9 home 5:13 151:2 263:18 387:20 477:18,22 Homeowners 114:15 honest 386:10 435:17 484:7 honestly 213:16 344:3 484:14 | honor 367:6 Hood 197:22 198:6 459:12 hope 7:6 21:5 33:13 91:5 106:16 126:3 128:17,22 217:4 288:22 305:21 316:19 348:2 359:1 447:22 476:20 480:14,16 495:6 497:18 499:1,16 hopefully 33:5 75:22 126:13 335:7 359:4 445:18 461:14 hopes 497:1 Hopkins 298:3 434:12 501:3,12 horizontal 210:22 212:19 306:17 hormones 67:10 72:2 horrible 424:15 horrified 345:20 346:9 Horticultural 282:5 Hortis 313:12 hospital 259:21 502:2 hospitals 503:11 hosted 523:13 hot 63:20 hour 33:5 165:20 194:7 197:4 493:10 hours 64:11 281:1 401:19 408:18 496:2 511:3 514:14 523:7 house 159:14 208:22 houses 6:7 32:1 158:13 184:2 housing 185:20 Houston 229:2 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|---------------------------|----------------------------|----------------------------|---------------------------|---------------------------|
| hover 337:13 | hydroponic 65:1 | illnesses 230:5 | 128:20,22 129:2 | improved 496:10 |
| huge 138:21 166:12 | hydroponics 64:19 | illogical 487:22 | 130:3 356:10 | improvement |
| 213:18 364:8 | hydroxy 153:22 | ills 439:13 | implemented | 224:8 |
| 437:21 458:17 | Hyer 406:22 | illustration 504:20 | 221:18 225:22 | improvements |
| human 47:1 57:7 | 424:20,22 428:5 | image 78:16 | 227:18 228:15 | 496:7,15 |
| 101:15 164:9 | 428:16,21 | images 78:2 | 300:2 353:7 | improving 402:12 |
| 176:17 206:19 | hyper-locale-spe... | imagine 89:10 | 355:21 484:21 | inaccurate 487:4 |
| 211:1,4,13,15 | 488:10 | 107:18 128:8 | implementing | inappropriate |
| 212:14,17,20,22 | hypothetical | 174:2 | 353:21 | 284:5 503:8 |
| 215:6,18 232:3 | 265:18 504:19 | immediate 258:2 | implications 23:11 | incentive 394:14 |
| 237:18 240:14,19 | | 466:5 | 123:13 | inches 518:18 |
| 241:2,8,9,19 | I | immediately 26:17 | implies 34:12 | incidence 334:12 |
| 242:16 245:3 | IBA 310:7 313:10 | 240:8 412:17 | importance 99:1,2 | 418:1 |
| 259:15,16 260:20 | 313:19 315:4 | immune 155:21 | 297:15 367:12 | incident 219:6 |
| 261:6,13,15 | ice 66:1 77:4,4,14 | 443:18 | 479:2 489:22 | incited 411:8 |
| 269:22 270:4 | ID 263:1 | impact 98:15 | 508:13 | include 15:18 17:9 |
| 300:5 306:8,19,20 | Idaho 46:1 59:15 | 146:22 147:2 | important 14:20 | 19:16 20:20 30:21 |
| 308:16 309:4 | 387:13 | 152:8 157:4 | 16:15,19 28:14 | 39:19 66:7,13 |
| 359:17 360:5 | idea 16:7,9 17:8 | 170:14 184:14 | 58:10 60:22 61:21 | 73:15 77:4 118:1 |
| 408:8 497:22 | 34:9 44:3 45:3 | 188:11 197:17 | 63:19 116:16 | 197:14 204:16 |
| 498:16 502:13 | 50:19 100:2 | 238:19 242:16 | 119:1 123:9 | 223:1 291:11 |
| 504:2,5 513:8,10 | 171:17 354:4 | 259:15 260:9,13 | 124:11 126:2 | 294:1 321:17 |
| humane 58:15 59:4 | 472:3 | 261:6 272:2 299:4 | 129:11 134:7 | 332:9 348:12 |
| 66:2 76:7 | ideal 129:5 471:7 | 306:3,7 309:4 | 146:4 155:18 | 380:6 447:6 |
| humans 237:14 | ideas 121:21 324:5 | 312:14,22 315:9 | 181:12 183:20 | included 81:12 |
| 238:1 241:11,15 | identification | 325:4 327:1 | 240:3,5 241:14 | 91:9 123:19 |
| 241:19 242:9,10 | 309:2 | 334:14 335:1 | 243:13 270:6,17 | 218:22 219:18 |
| 257:10 259:3,18 | identified 96:12 | 337:19 385:15 | 271:6,10 283:13 | 290:17 349:9 |
| 315:9 332:21 | 235:7 292:16 | 386:1,12 396:3,8 | 336:16 339:9 | 353:12 |
| 333:3,7,8 443:21 | 297:7 326:12 | 396:14 397:1,4,10 | 350:17 351:15 | includes 187:7 |
| humbled 474:14 | identify 15:20 17:5 | 441:6 456:18 | 354:12 356:14 | 219:16 224:19 |
| humidity 444:16 | 39:20 118:21 | 466:10 | 385:10 386:4,7 | 279:6 321:13 |
| 450:7 | 119:12 120:13 | impacting 296:16 | 414:4 433:22 | 374:21 503:11 |
| hundred 63:13 | 235:5,12 440:14 | impacts 76:10 | 442:18 454:20 | including 19:17 |
| 478:13 | 440:16 | 139:13 258:1 | 458:21 461:22 | 30:7 79:19 80:21 |
| hundreds 323:10 | identifying 321:20 | 300:6 306:16 | 464:6,7 493:15 | 130:13 220:17 |
| 363:1 371:11 | ideological 479:7 | 336:17,18 383:5 | 494:9 498:10 | 234:15 316:5 |
| hurt 137:19 475:5 | idiosyncracies | imperative 177:22 | 504:2 509:19 | 325:13,20 346:18 |
| 475:5 512:9 | 134:14 | imperfections | importantly 499:4 | 354:14 361:18 |
| hurts 346:4 512:3 | IDS 246:1 | 423:20 | imported 59:12 | 365:21 453:19 |
| husband 150:2 | IDSA 246:3 | implement 15:20 | 493:11 | 470:16 498:11 |
| hydraulic 74:21 | ignorant 504:15 | 39:20 225:1 | impose 310:12 | 503:13 |
| hydrodynamics | ignored 509:22 | 263:16 382:20 | impressed 461:17 | inclusion 19:2 |
| 74:22 | ignoring 492:8 | 486:12 488:7 | impression 252:22 | 109:21 293:2 |
| hydrogen 153:20 | illegally 47:11 | 510:6 | 371:6,9 | 327:6 333:21 |
| hydrolysis 210:19 | illness 72:6,19 | implementation | improve 224:6 | 395:4 |
| 279:12 | 502:13 504:5 | 13:16 127:18 | 494:2 | inclusions 139:21 |

| | | | | |
|----------------------------------|--------------------------------------|----------------------------|-----------------------------|-----------------------------|
| income 346:7 | indicator 75:5 | infect 479:8 | 94:6 | 97:22 394:16 |
| incompatible 297:20 | indiscriminate 426:14 | infected 399:4 | informative 490:11 | innovative 54:22 |
| inconsistent 488:17 | indistinguishable 214:5,14 | infecting 443:21 | informed 271:21 | 57:8 64:16 97:17 |
| Incorporated 331:10,15 | individual 11:9 | infection 52:5 | 413:17 493:6 | 353:6 |
| increase 14:13 | 109:21 135:13 | 220:20 228:9 | informs 14:6 | innovator 477:13 |
| 140:8 161:3 | 190:8 297:22 | 240:14 261:21 | infrequent 421:1 | input 13:21 16:20 |
| 239:17 259:1 | 298:15 382:12 | 294:3 444:15 | ingests 150:16 | 24:20 26:4,14,15 |
| 290:5 293:17 | 390:18 | 471:7 475:22 | ingredient 82:11 | 26:20 130:10 |
| 354:3 356:3 360:3 | individuals 9:12 | 479:16 | 112:12,16 135:13 | 131:7 227:14 |
| 369:20 418:9 | 12:18 83:18 115:2 | infections 199:8 | ingredients 56:15 | 292:12 309:7,8 |
| 481:20 490:5 | indole 315:3 | 399:4 400:22 | 108:21 110:19,22 | 373:17 427:17 |
| 502:13,13 | indole-3 313:9 | 502:2,4,7,11 | 111:7,12,13 | 486:4 |
| increased 47:3 63:5 | indoors 65:19 | infectious 180:15 | 114:11 117:10 | inputs 82:9 221:14 |
| 140:4,12 148:13 | induce 122:7 | 228:22 229:11 | 136:1,5 141:22 | 224:21 445:17 |
| 148:16 290:9 | industrial 438:13 | 231:11,12 246:2,5 | 150:8 157:8,10 | 471:21 496:17 |
| 353:20 388:3,5,8 | industry 47:20 | 271:8 | 161:9 202:15 | 497:14 500:2 |
| 445:19 468:18 | 78:11 132:12,16 | infests 505:2 | 499:5 | ins 392:4 |
| increases 137:1 | 132:21 143:20 | influence 5:5 74:21 | inherent 480:8 | insect 248:10 362:6 |
| increasing 238:4 | 161:19 164:12 | inform 14:9 15:13 | inherently 170:3,4 | Insecticide 308:7 |
| 239:21 352:8 | 178:11 181:9 | 39:13 | 172:16 173:16 | insectory 225:9 |
| increasingly 260:19 | 182:4 187:2 | informal 361:9 | 489:11 | insects 5:13 334:17 |
| incredibly 32:21 | 203:11 216:14 | information 4:6,18 | inhibit 335:2,3 | 334:20 335:4 |
| 56:3 134:7 479:8 | 217:22 225:16 | 13:18 14:4,11,15 | 501:21 | 336:7 337:18 |
| incubated 55:13 | 227:8 228:3,4 | 16:5,14 29:15 | inhibited 312:19 | insentient 76:20,21 |
| incur 393:12 | 287:6 292:18 | 33:2,3,6 34:15,20 | inhibition 208:18 | inside 186:5,6 |
| independent 48:11 | 304:7,15 321:18 | 94:16 106:6 118:9 | 209:5 | 238:8 518:17 |
| 164:8 387:8 | 343:21 348:12,18 | 120:1,9 126:22 | inhibitor 334:13 | Insider 25:14 |
| 453:16 478:12 | 349:10,17 353:19 | 127:13 132:22 | inhibits 329:2 | insight 494:13 |
| independently 128:5 | 357:19 361:1 | 150:7 152:20 | inhumane 58:20 | insights 32:22 |
| indepth 288:13 | 365:20 366:5,8 | 162:9,20 163:2 | initial 9:6 224:11 | insignificant 307:6 |
| Indiana 65:19 | 367:9 368:3 | 165:8,12 179:21 | 450:3 | inspected 373:22 |
| 159:6 345:9 | 369:14 384:6 | 189:3 191:16,17 | initially 68:4 83:12 | inspecting 227:2 |
| indicate 223:8 | 385:20 388:15 | 196:12 217:3 | 178:21 348:13 | 228:3 |
| 304:9 368:10 | 389:14 395:18 | 226:15 243:18 | initiate 28:7 | inspection 81:20 |
| 377:16 479:17 | 396:15 397:18 | 244:4 252:13 | initiated 20:18 | 217:15 219:4 |
| indicated 76:5 | 407:20 413:6,18 | 254:16 257:7 | 28:19 | 222:17 226:9,9,11 |
| 103:15 115:17 | 427:7 453:10 | 288:19 303:22 | initiating 20:22 | 227:19,22 229:19 |
| 205:5 450:4 | 454:4 456:7 469:8 | 334:5,10 340:21 | 28:1 | inspections 81:17 |
| indicates 183:6 | 474:6 491:19 | 368:6,14 371:15 | initiation 8:13,21 | 226:18 299:17 |
| 316:17 444:10 | 492:5 512:9 | 375:15 377:15 | 18:10,18 | inspector 81:16 |
| 448:9 484:13 | ineffective 223:22 | 391:11 412:20 | inject 430:13 | 84:21 377:5 |
| indication 21:4 | 368:19 400:8 | 415:13 430:14 | injectables 493:18 | inspectors 226:22 |
| 412:9 | 492:5 512:9 | 431:2 436:12 | injuries 183:2 | 227:8,11,15,20 |
| | inertia 394:11 | 439:3 458:18 | injury 73:1 | inspector's 226:12 |
| | infant 150:16 | 461:3 483:19 | innoculant 427:8 | inspired 460:10 |
| | 190:15 | 498:5 499:10 | innocular 197:15 | instabilities 207:18 |
| | | information-wise | innovation 97:10 | instance 77:8 85:18 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 88:22 89:11,18 95:19,21 259:13 342:17 instances 29:11 151:3 233:10 239:10 260:22 270:9 339:22 instantaneous 59:3 instantaneously 509:11 instantly 76:20 instigated 484:21 institute 23:5,12 27:10 105:4 108:5 109:20 110:17 113:18 141:16 167:9 228:19 230:15 368:13 370:16 519:3 institutional 43:19 instructs 30:4 instrumentation 264:3 instruments 265:11 insufficient 352:22 intact 347:11 intake 140:8 integrate 33:7 278:7 308:11,12 integrated 53:7 71:19 168:8 225:1 230:21 246:17 327:18 355:22 373:9 510:5 integration 66:14 509:13 integrative 507:19 508:6 integrity 218:1 360:14 499:13 intelligence 229:7 intend 188:5 intended 14:8 175:8 300:22 332:21 333:2 intense 353:4 513:10 | intent 47:7 341:3 355:12 intention 91:14 182:6 intentions 510:15 interact 135:17 interactions 199:3 385:16 interbreed 174:9 interconnected 6:11 interest 15:3,14 17:22 21:22 27:16 36:22 37:1 39:15 140:20 210:4 283:8,13,15 284:4 284:11 286:3 380:18 425:7 431:15 483:2 491:15 interested 24:12 161:22 199:10,14 200:4,8 203:21 205:6 218:11 249:8,19 392:8 429:21 440:17,20 483:5 484:7 514:20 interesting 72:7 84:8 105:7 166:8 212:3 238:22 248:15 262:1,5 432:12 interestingly 54:16 interests 197:14 204:15 283:9 interim 48:19 104:8 107:22 116:2 127:13 130:16 229:16 310:20 internal 5:17 7:17 8:19 14:19 55:21 229:10 442:11 international 123:13 124:19 249:3 | Internet 15:22 39:22 392:22 433:11,12 interpret 131:17 interpretation 21:19 308:22 357:22 358:8 interpretive 104:1 interrogation 98:4 interrupt 109:2 intersect 269:21 interstate 112:4 interval 410:1 417:19 interviews 226:19 interweaving 6:9 intestinal 237:8 239:6 256:4,6 259:20 261:13,17 intestine 240:17 introduce 109:7 196:18 502:18 introduced 170:10 introduces 18:13 introducing 307:3 472:6 introduction 31:1 197:1 205:6 217:8 220:3 231:5 282:2 invariably 360:11 inventory 252:4,11 invertebrates 338:6 invest 494:19 invested 441:13 investigate 198:13 investigated 304:9 investigation 113:4 investment 362:20 401:4 455:18 456:3 investments 363:1 invited 93:5 191:20 inviting 134:5 involve 30:12 involved 69:1,6 81:21 120:2 131:6 | 216:14 326:9 355:11 439:22 468:17 469:14 483:21 involvement 395:22 involves 443:19 Iowa 216:5,11 IPM 351:9 iron 209:17,18 ironically 69:19 86:1,3 irreducible 172:7 island 235:21 Islands 64:21 isolates 211:21 issue 19:3 20:11 21:10,12 86:14,15 91:12 103:13 104:7 124:6,20 127:14,22 128:5 128:21 130:9 131:11 132:21 135:12 158:17,17 170:22,22 171:21 171:22 191:10 197:2 201:16,19 250:5 267:14 274:16 288:16 306:11 310:6 338:5 348:14,18 349:17 350:11 359:1,16 363:6 364:8 383:22 391:10 422:5 429:3 431:1,19 433:22 449:8 451:9 454:5 482:22 515:8 issues 8:3 14:17 17:4,6,6 21:14 81:14 111:10 114:18 125:4 131:6 152:17 153:6 167:18 169:17 189:16,17 189:18,20 190:3 | 198:21 201:15 243:1 276:4 306:14 389:22 390:2 401:21 425:10 434:5 441:12 492:21 494:7 509:19 italics 15:8 39:9 itching 347:14 item 29:9,19 331:21 332:5 381:1 itemizing 40:18 items 7:9 8:6,20 20:3,5 28:15 78:21 itinerant 141:15 itsy 101:4 itty-bitty 104:21 |
| J | | | | |
| James 230:6 317:6 320:20 Jamie 346:15 Jane 350:1 358:15 358:15 Jane's 350:3 January 18:2 109:20 331:20 Jay 1:18 12:12 18:9 18:14 32:15 40:6 40:13 139:3 177:3 193:6 196:13 205:1,5 215:20 280:19 281:16 285:7 310:15 313:8 364:9 374:12 384:1 390:8 418:16 427:13 438:5 450:9 461:1,16,21 464:11 514:18 Jay's 465:14 522:11 Jean 1:21 79:1 101:4 116:3 126:21 127:1 | | | | |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 129:5,11 131:12 181:4,22 313:5 324:19 348:3 422:10 Jeff 392:16 408:12 490:13 495:16 500:9 Jennifer 1:22 12:14 13:1 40:7,11 Jenny 36:3 jeopardized 183:14 jeopardizes 369:14 Jessica 500:14 507:10,12,15,16 510:19 Jim 60:1,1 321:2 job 40:18 43:3 226:12 273:16,18 359:9 398:20 403:17 431:6 459:17,19 460:6 461:1 466:9 519:13 523:1 John 1:19 12:12 33:15 40:14 41:5 46:3 176:5 249:16 268:18 310:10 313:6 314:14 403:3 404:21 406:22 424:20 448:11 517:12 Johns 298:3 434:12 501:3,12 Johnson 197:7,7,18 198:1,3 246:7,20 249:18 250:7 251:12,15 253:3 257:16 262:18 263:5 266:2 271:15 272:7,10 274:20 275:6 277:19 364:3 372:21 508:4 Johnson's 197:13 211:9 joined 45:19 joining 44:16 | 204:22 231:3 joint 282:4 Jordan 12:12 JOSEPH 1:17 journal 414:14 journals 230:17 414:19 judgment 435:14 judgments 94:2 499:14 judicial 172:13 Julie 347:7 jump 6:22 158:11 266:14 283:5 476:2 June 249:4 282:3 473:19 justification 489:20 justify 19:11 juveniles 56:6 <hr/> K <hr/> K 518:9 Kaken 310:22 335:14 kaolin 206:4 248:8 karmically 152:15 kasugamycin 326:11 Katherine 487:2 keep 6:9,14,15 24:15 31:22 32:1 34:22 64:8 109:18 115:2 124:21 125:5 156:12 184:19 298:7,17 298:18 299:1 347:9 400:16 413:17 419:10 430:21 461:11 keeping 34:22 150:12 223:4 keeps 434:7 kelates 209:18 kelator 209:18 kelp 54:21 55:1,8 62:12,13,15,18 | 80:13,21 90:12 91:14 kelps 88:9 Ken 197:6 269:10 271:15 364:3 372:21 441:18 508:3 Kenneth 429:14 441:15 kept 55:13 key 81:19 128:21 298:21 359:16 411:15 414:20 kibble 138:14 146:10,12 kidding 9:18 kids 346:16 464:13 kill 59:2 273:11 312:19 336:14 337:5 360:22 470:2 501:20 502:10 504:22 killed 233:16 killer 473:18 killing 65:21 233:9 326:1 kills 479:10 kilograms 86:20,21 86:21 kilos 86:9 Kimbrell 161:15 167:11,13,15 173:4 174:1 175:5 176:12,22 177:9 430:10 kind 11:14 34:21 51:2 54:11 82:10 94:22 127:19,22 128:2,13,15 129:8 172:21 178:7 183:11 196:7,13 202:8 232:9 239:19 241:5 247:21 248:14,15 248:21 249:6,19 250:1,21 253:16 264:11 267:3,9,15 | 274:1,15 278:9 298:13 359:2 405:3 414:8 417:19 435:9 439:13 440:9,19 450:6 461:13 472:14 485:16 506:6 513:1 515:18,21 517:17 519:9 521:2 kinds 90:17 250:9 357:19 384:15 Klamath 511:2 518:8,9 knew 152:22 153:3 275:3 379:5,6 427:15 know 9:1 11:4,20 33:22 35:3 40:21 55:10 56:13 60:1 60:2 66:9 78:22 81:6,6 89:7,13,18 89:21 91:3,18 92:3 94:20 95:3 97:2,14 98:7 99:15 108:19 116:9 117:19 118:10 119:18 121:16 122:14 124:22 125:19 127:12,21 128:14 133:4 134:18 135:7,14 136:7 137:7,9 138:12,13 139:22 140:2,14 143:9 147:14,21 149:7 152:15,17 152:19,22 153:2,6 157:11 159:12 160:15 162:3,19 167:17 177:11,18 180:3 186:21 192:6 193:18 197:18,21 202:17 203:1 206:17 212:1 217:8 218:11 233:17,17 | 235:21 237:17 241:5,10 242:5,11 243:19 244:15,19 245:6,16 246:6 248:12 250:13 251:4 254:11,17 255:11,15,21 256:16 257:6 258:7,20 261:1 264:22 266:1,17 267:2,9,19,22 268:8,12,13,13,14 269:4,15 272:3 274:11,11 275:5 275:16,17 281:12 283:12 289:1 296:19 303:11 306:12,15 309:21 318:9 320:9 327:11,21 343:12 345:13,16 354:7 357:2 358:1,3,3 384:4 386:11 389:18 390:10,12 390:17,20 392:2 395:8 396:10,17 399:1 401:2 403:5 405:21 406:7,15 406:17 417:12 421:2,3 422:13,16 422:18 427:19 431:6 432:1,8,11 432:13 436:2,8 437:4,11 438:3,15 438:20 439:3,9,12 441:10 447:22 451:4,22 462:13 463:7,10,10,16,16 464:1,3,7 465:9 465:13 466:2,3,16 467:3 472:8,16,16 472:17,20 473:4,6 473:11,22 475:14 476:14 477:13 483:11,11,17,19 484:5,14 485:6,15 497:16 500:8 |
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| 501:16 506:9,16 506:17,21 507:3 510:17 513:22 514:5 516:20 520:12,14,16 521:3,10,16 knowing 35:8 142:7 266:22 274:15,17 287:4 385:20 387:19 knowingly 152:19 knowledge 43:19 98:6 105:8 244:3 248:22 262:14 287:2 442:2 448:20 497:19 known 70:3 111:3 235:5,13 250:22 313:10 367:11 381:6 455:8 knows 6:17 89:9 151:13 Kwemena 46:8 | lack 30:19 113:20 118:8 183:14 212:17 262:14 285:18 315:9 337:5 407:22 408:1,2 410:16 lackluster 340:1 ladies 153:11 400:6 lady 5:16 156:1 ladybird 334:17 335:19 ladybugs 334:21 laid 302:20 lake 65:20 278:3 295:14 467:22 land 86:6,7,9 166:10 416:21 443:5 490:1 landing 210:15 landmark 414:10 landscape 98:10 496:4 land-based 80:1 86:15 language 15:19 39:19 357:8 460:12,13 484:13 492:12 languished 521:3 large 59:2 105:13 113:21 114:2,3 137:21 144:10 190:8 290:21 333:7 361:9 426:12,15 larger 51:19 53:1 248:5 293:17 362:20,22 377:20 442:8 479:22 largest 217:17 379:17 387:7 426:3 443:2 Larry 211:9 larvae 55:15 337:20 laryngotracheitis 180:15 | Lastly 489:21 lasts 209:2 331:1 late 14:12 138:15 199:5 214:5 268:11 350:11 429:2 449:6 480:10 laughing 378:13 Laughter 355:6 374:10 452:7 477:20 522:15 law 168:18 172:3 301:2 420:9 lay 188:21 288:4,7 layer 187:2 188:16 layers 6:12 187:5 188:20 laying 162:18 lead 8:15 9:2 184:1 309:12,13 350:22 443:20 leader 309:17 453:19 leaders 310:2 397:17 leading 46:2 299:19 453:15 leads 93:10,17 leaf 208:11 319:22 320:2 learn 129:19 151:1 269:2 344:20 346:10 349:17 432:5 learned 247:8 267:2 341:20 460:9 511:20 learning 179:18 200:1 277:12 433:19 leave 50:3 125:8 177:20 194:8 477:7 480:15 507:3 Leavenworth 249:4 leaves 125:9 208:12 | 211:8 214:3,4,10 369:9 leaving 368:21 399:8 477:3 lecture 501:12 led 30:6 56:18 163:21 left 49:8 61:1 93:6 417:5 462:6 476:20 494:21 498:22 legal 19:19 65:21 417:18 446:1 519:18 legally 353:16 356:15,17 legislative 112:7 Lejeune 380:10 length 302:17 lengthen 25:8 lengthened 26:22 lengthy 195:16 lepidoptera 496:13 Leslie 133:10 141:6 lessen 505:13 lessons 269:2 lethal 73:10 letter 246:3 284:16 298:19 letters 169:9 letting 77:12 128:13 153:13 196:9 453:4 let's 102:9 123:8 141:19 156:13 157:15 161:1 194:15 375:19 396:2 452:5 501:19 507:3 level 37:6 91:1 121:5 139:20 154:21 155:13 157:13 159:9 189:5 190:20 204:21 214:6 221:17 222:6 238:10 239:13 | 245:2 255:16 257:11 270:16 271:5 305:5 307:19,21 308:2 322:21 373:4 419:5 420:21 456:6 485:10,14 levels 67:19 82:11 82:12 148:13,15 155:19 189:18 231:19 233:13 234:6 236:1,4 239:14,17 255:18 256:1,5 257:2 258:8 262:1,2 300:10 308:18 345:1 409:15 420:19,20 levity 141:12 Levy's 237:1 Lewis 478:1 485:19 485:21,22 library 62:2 lice 174:16 licensed 500:21 lies 491:14 life 6:7 35:4 143:16 145:4 146:16 148:8 150:20 154:14 183:15,21 185:16 190:22 252:4 293:17,19 330:3,10 331:5 347:8 430:21 474:3 480:2 490:18 494:17,19 494:20 life's 401:3 light 22:18 118:18 141:7,8 171:21 207:20,21 316:17 341:17 471:4 507:6 522:11 lightbulb 520:8 lightly 402:11 liked 341:1 like-minded 187:1 |
| L | | | | |
| lab 207:13 264:20 416:3 423:10 label 177:17 297:3 360:14 410:3,4 416:9,10,11 417:14 429:22 430:4 433:8 485:9 505:17 labeled 108:17 115:10 321:22 labeling 103:14 104:2,9 120:4,4 207:22 322:16 484:12,20 485:9 labels 112:11,12 129:7 322:19 484:16,17 labor 480:11 laboratory 178:16 410:21 lacewing 334:18 lacewings 337:14 | | | | |

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| lime 372:18 448:22 488:12 | 224:21 282:10 292:14 301:1 | 252:7 266:16 277:9 278:11 | 367:20 387:18 401:15 | 389:12 402:5 405:12,18 408:18 |
| limit 182:21 220:20 260:21 314:19 409:18 410:2 417:18 504:4 | 311:3,6,19 312:7 312:11 313:20,22 315:2,3 317:16 352:18 353:16 372:20 384:8 394:18 395:6 440:7,8 450:16 463:8,16 481:18 489:1 | 280:19 281:6 286:12 288:5,6 291:12,14 295:19 296:10 300:7 307:5 315:18 316:14 341:1 342:6 358:7 361:15 362:8 375:4 384:22 398:7 404:5,6 414:2 415:13 423:3 453:14 484:15 485:4,5,6 516:1 | localized 451:12,14 451:16,18 locally 80:19 387:15,17 located 54:18,19 182:18 228:1 350:7 486:9 location 16:10 81:13 98:14 locations 303:7,21 416:7 lock 52:12 194:9 Lockwood 43:11 44:11,14,15 59:14 72:20 77:21 79:15 85:6 86:17 88:18 89:7 90:8,13,17 95:10 98:17 99:5 100:22 101:13 105:6,21 106:19 log 24:6 logging 24:17 logic 193:17 460:5 464:3 logical 124:16 130:18 logically 438:14 logistical 274:16 long 6:16,18 25:16 26:2 71:14 103:18 126:12 181:16 196:10 198:16 217:14 250:8,10 258:4 269:14 278:20 293:22 308:19 326:5 328:6 330:5,9 344:1 352:22 355:11,17 403:7,7 452:5 464:14 466:10 510:17 518:2 521:1,3 522:21 longer 76:19 121:3 121:4 202:10 | longest 289:3 long-term 152:10 184:14 242:16 256:3 259:14 325:17 328:16 333:16 395:16 467:8 long-time 318:5 480:17 look 44:6 48:4 53:9 54:9 55:7,10 56:12 84:4 91:5 91:11 97:4 122:1 122:5 123:3,8,12 123:19 124:5,17 126:5 127:12 130:15 135:16 137:5,15 139:6 140:1 142:4 143:13 144:13,20 146:14 147:13,17 148:12 155:22 156:3 163:7 165:8 176:11,20 188:11 188:15 190:9 198:9 201:3,9 203:10,22 206:14 206:14 248:14 250:3 262:3 278:12 305:21 307:8 330:8 359:2 377:22 423:17 431:10 437:5,12 438:4 462:2,3,5 480:14 484:19 521:16,18 looked 99:22 100:6 102:21 103:22 112:10,11 124:2 160:4 187:12 193:18 198:7 205:14 211:7 213:16,19 215:10 280:10 286:5 308:15 326:14 |
| limitations 322:12 322:16 353:13 | listed 15:8 118:7 221:20 240:4 313:21 322:18 323:19 488:12 listen 9:1,3 316:2 listening 252:22 500:5 510:16 514:15 listing 11:16 12:3 282:10 289:10 312:6 315:3 322:2 322:9 | live 6:7,13,16 166:14 172:9 402:13 433:19 469:15 495:1 livelihood 293:20 455:4 480:3 livelihoods 509:4 liver 136:20 146:2 lives 505:17 livestock 3:15 4:12 64:5 79:1 99:1 107:3,10,16,18 108:16 110:3 115:9 116:13 118:12 119:5 126:15 130:15 131:14,20 142:9 142:10,14 145:20 172:1 173:6 182:7 186:10 192:10 216:13 371:3 433:16 486:9 492:14 493:17 511:13 living 72:20 145:21 251:19,21 497:9 loaded 210:10 Loading 64:2 lobbyist 23:6 27:11 local 98:16 265:9 | looked 99:22 100:6 102:21 103:22 112:10,11 124:2 160:4 187:12 193:18 198:7 205:14 211:7 213:16,19 215:10 280:10 286:5 308:15 326:14 | |
| limited 76:18 102:2 143:15,20 146:15 168:10 199:18 220:17 252:11 270:13 276:3 303:21,22 304:3,4 305:20 310:22 322:6 341:10 352:7 383:13 391:2 443:16 486:14 492:13 | limits 46:13 420:2 Lincoln 486:10 line 66:3 97:3 121:1 168:17 169:18 330:19 387:11 395:2 412:15 420:12 516:13 520:22 lines 291:20 293:9 457:4 483:11 link 12:5 linkage 51:9,12 215:15,18 353:17 lipid 82:19 Lisa 2:18 109:16 310:13 313:4,7 list 13:12 19:2 22:3 26:2 28:3,16 29:7 68:6 100:4,6,12 101:1 109:22 117:4,13 120:11 125:9,22 126:5 129:6 141:22 142:2 192:7 221:21 223:2 | lists 144:15 147:8 170:11 listserv 35:12 literally 92:7 217:11 literature 144:10 187:19,20 213:6 254:4 506:17 liters 399:9 litmuses 135:13 little 4:19 5:2 22:18 36:6 44:7 63:17 78:3 79:13 88:16 90:21 108:20 112:1,8 141:11 149:15 150:8 161:3 163:10,13 165:22 173:20 189:10 193:10 194:13 195:5 196:9 200:12,15 217:12 218:5 222:15 233:14 246:8 249:10,13 | log 24:6 logging 24:17 logic 193:17 460:5 464:3 logical 124:16 130:18 logically 438:14 logistical 274:16 long 6:16,18 25:16 26:2 71:14 103:18 126:12 181:16 196:10 198:16 217:14 250:8,10 258:4 269:14 278:20 293:22 308:19 326:5 328:6 330:5,9 344:1 352:22 355:11,17 403:7,7 452:5 464:14 466:10 510:17 518:2 521:1,3 522:21 longer 76:19 121:3 121:4 202:10 | lock 52:12 194:9 Lockwood 43:11 44:11,14,15 59:14 72:20 77:21 79:15 85:6 86:17 88:18 89:7 90:8,13,17 95:10 98:17 99:5 100:22 101:13 105:6,21 106:19 log 24:6 logging 24:17 logic 193:17 460:5 464:3 logical 124:16 130:18 logically 438:14 logistical 274:16 long 6:16,18 25:16 26:2 71:14 103:18 126:12 181:16 196:10 198:16 217:14 250:8,10 258:4 269:14 278:20 293:22 308:19 326:5 328:6 330:5,9 344:1 352:22 355:11,17 403:7,7 452:5 464:14 466:10 510:17 518:2 521:1,3 522:21 longer 76:19 121:3 121:4 202:10 |

| | | | | |
|---------------------------|---------------------------|----------------------------|---------------------------|--------------------------|
| 336:3 350:12 | 494:13 | 441:3,7 | 88:22 | 495:15 514:13 |
| 433:10 465:15,15 | lot 4:6 8:22 9:20 | loving 6:8 | macrocystis 62:16 | 519:13 |
| looking 5:8,20 | 34:3,5,7 35:2 51:7 | low 73:8 87:4 | mad 178:6 | males 66:21 |
| 83:15 113:5 | 56:11 57:11,12 | 213:13 239:14 | Madam 192:9 | mammalian 67:10 |
| 124:14 135:14,19 | 66:7 68:18 71:16 | 255:16,22 256:5 | magazine 188:6 | 95:22 |
| 136:12 147:7 | 72:8 90:22 98:17 | 262:2 308:18 | magnitude 86:8 | man 504:15 517:9 |
| 198:15,20 214:10 | 100:12 118:5 | 322:12 333:9 | mail 372:5 | manage 83:20 |
| 224:8 225:13 | 132:22 143:20 | 338:10 346:7 | mails 265:3 | 221:7 243:6 320:9 |
| 241:4 243:16 | 144:3,3,6,9 148:9 | 466:5 467:9 503:8 | main 20:2 168:9,21 | 399:2 458:21 |
| 252:9 260:6 | 151:17 154:17 | lower 136:5,8,9 | 168:21 172:8 | managed 74:15 |
| 265:14 266:9,22 | 159:8 166:15 | 214:22 361:20 | 364:12 | 371:22 447:9 |
| 271:17,18 277:7 | 167:18 189:2 | 362:1 408:16 | Maine 45:15 50:18 | management 67:4 |
| 305:4 326:10 | 198:21 200:1 | 466:16 | 52:3 53:19 54:4 | 71:3,17,19 73:9 |
| 334:20 336:17,18 | 201:2 211:6,17 | lowest 67:19 | 54:22 55:8 83:10 | 73:15 76:4 81:21 |
| 338:21 339:7,13 | 232:5 236:9 240:9 | lucky 56:16 150:17 | 106:8,8,9 | 99:19 185:19 |
| 348:17 397:5 | 241:21 242:13 | ludicrous 171:19 | mainstream 439:14 | 197:16 207:3 |
| 408:14 413:5 | 245:22 248:19 | lunch 107:12 193:5 | maintain 15:20 | 220:10,15,19 |
| 414:9 424:15 | 252:15 267:2,15 | 194:4 195:6 | 39:21 70:9 76:21 | 221:11 223:11 |
| 430:4 431:5 | 267:16,17 272:22 | 196:17 271:21 | 100:8 475:13 | 224:7 226:4 |
| 437:11 465:16 | 274:1 283:12 | 341:20 | 500:3 | 227:17 228:7,13 |
| 506:19 | 285:2 288:17 | lung 136:20 | maintaining 64:9 | 295:21 321:7,8,12 |
| looks 35:20 55:11 | 317:15 318:7,18 | luxury 195:14,15 | 339:7 499:13 | 352:14 356:2 |
| 55:16 56:8 193:1 | 319:6,8 321:9,19 | 196:1 | major 47:5 99:11 | 367:16 373:13 |
| 328:7 341:5 401:7 | 322:7,17 323:9 | Lynn 343:7 345:8 | 138:14 154:18,18 | 383:10,15 384:10 |
| 508:4 | 335:6 338:1 | 350:1,4 355:2,4 | 171:21 197:13 | 487:12 499:20 |
| loophole 30:22 | 356:20 358:2 | 357:5 358:14 | 204:15 231:13 | 500:2 508:6 510:4 |
| 492:16 | 364:7 390:15 | 365:2 382:18 | 236:11 240:14 | manager 83:15 |
| loopholes 30:13 | 403:21,21 404:4 | 435:1 | 263:10,11 304:6 | 186:12 216:1,15 |
| 31:6 | 404:14 405:10,18 | lysine 112:19 114:8 | 322:13 361:7 | 386:21 |
| Lorraine 11:8 | 421:9 432:18 | 143:4 147:10 | 411:7 425:15 | manages 125:15 |
| lose 183:5 389:11 | 457:19,22 460:9 | 148:15 | 501:8 503:18 | managing 216:17 |
| 394:13 456:1 | 460:12 472:6,12 | L-methionine | majority 29:5 | 324:9 356:5 508:9 |
| 463:6,21 481:11 | 516:2,17,20,21,22 | 153:22 | 125:21 237:5 | mandate 151:9 |
| 512:2 521:13 | 517:4,9,18 520:9 | | 281:15,18 288:13 | 170:15 364:16 |
| loses 209:16,17,18 | 520:15 | M | 290:15 291:10 | 395:11 |
| 213:11 | lots 34:16 112:11 | M 178:5 | 292:6 294:13 | mandated 521:9,12 |
| losing 295:2 369:4 | 112:11 137:11 | Mac 1:12,15,22 | 296:4 297:16 | Mandley 429:14 |
| 382:6 456:4,6 | 166:10 199:10 | 32:17 44:14 77:19 | 301:12 302:15,21 | 441:15,17,18 |
| 463:9 480:5 | 236:8 429:22 | 105:7 106:20 | 304:9 305:8 310:5 | 446:22 447:19 |
| 498:13 510:9 | 463:10 506:18 | 107:17 108:2,22 | 312:10 325:18 | 448:14,16 449:5 |
| loss 184:2 361:11 | Louisiana 46:4 | 109:17 115:15,16 | 364:14 380:3 | 450:2 451:6,17 |
| 369:11 445:4 | love 6:8 106:12,13 | 116:1 192:12,14 | majority/minority | 452:5,13,21 514:4 |
| 468:8 476:15 | 166:22 | 196:16 309:19 | 281:12 | Manley 441:16 |
| losses 369:2 | Lovera 424:21 | 459:9 484:10 | making 14:2 33:6 | 452:22 |
| lost 43:19 159:17 | 429:14,16,17 | machine 158:6 | 94:1 104:11 221:6 | manner 97:9 300:3 |
| 343:15 367:14 | 435:4 436:16,20 | 160:15 435:7 | 369:13 433:16 | 390:4 |
| 480:9 481:13 | 438:10 440:6 | macroalgae 62:11 | 454:17 494:20 | mantis 5:15 |

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| manual 7:20 19:4 20:1 28:13 40:20 302:8 | 425:20,20 427:18 427:20 451:5 475:16 480:11 481:16 482:11 517:7 | 318:3,8 319:1,10 319:19 320:4,11 320:14 324:11 325:3 326:12 328:7 338:14 340:7,16,19 341:5 341:8 351:14 353:14 373:9 378:8 384:8 402:3 409:12 437:20 450:16,18 468:9 469:15,19 470:1 470:10,13 473:4,9 473:11 475:4 486:4 488:16 499:5,11 511:18 521:10,18,21 | 431:5,7,13 432:8 434:13 435:9 437:4,11,17 438:2 448:21 463:8 468:13,13 470:15 471:14,17 475:12 488:12 489:10,14 497:5,10,11,18 499:17 512:22 522:1 | meals 147:15,15,16 149:9 meal/fish 69:18 mean 43:8 82:20 85:3 97:14 131:1 152:19 197:21 221:3 243:22 251:5 252:1 274:4 275:15 279:13 325:13 330:7 376:17 377:8,9 406:12 428:2 436:21 438:10 440:21 441:7 451:16 481:14 485:10 |
| manufactured 153:22 402:8 | marketed 47:11 108:10 332:22 | 409:12 437:20 450:16,18 468:9 469:15,19 470:1 470:10,13 473:4,9 473:11 475:4 486:4 488:16 499:5,11 511:18 521:10,18,21 | material's 435:16 mathematical 241:4 258:20 261:9 mating 396:17,19 matter 107:6 125:5 194:19 300:17 339:6 342:11 475:2 523:22 | meaning 487:17 means 15:22 22:19 24:14 40:1 50:19 66:18 74:1 77:3 81:11 121:1 126:8 149:15 219:12 235:11 255:19 303:22 316:8,22 345:2 358:18 428:7 |
| manufacturer 114:21 120:8 419:13 | marketers 354:11 | materially 29:16 | matters 15:3 17:22 49:4 285:13 | meant 348:5 516:8 |
| manufacturers 114:5 123:11 126:4 139:7 401:12 402:18 419:16 | marketing 1:1 433:3,5,7 478:5 | materials 14:10 18:17 20:7,17,20 21:14,18 28:15,16 30:5 42:18 44:1 45:4,4 78:18 99:1 99:3,10 109:6 200:13 222:3,14 223:21 246:13,14 246:17 248:8 251:18 253:4,19 268:22 273:3 276:16,17 283:21 290:10 299:12 304:2 305:11 309:20 315:19 317:15 318:17,18 319:14 320:17 321:20 322:9 324:2,8,16 325:5 325:19,20 327:5 327:13,15,20 328:1,2,3 352:14 353:5,11 356:1 366:19 369:3 372:18 374:16 397:8 401:14 402:1,17 408:10 409:13,21 412:14 414:15,18 422:15 | maturity 154:22 155:2 157:20 343:18 | measurable 345:1 349:11 409:15 |
| manufacturing 56:19 111:4 113:16 124:5 | marketplace 50:7 105:3 114:14,16 115:11 118:8 119:18 123:16 351:2 380:16 | matters 15:3 17:22 49:4 285:13 | mature 464:16 | measured 81:15 |
| manure 76:1 210:7 | markets 74:17 427:22 494:11 | matters 15:3 17:22 49:4 285:13 | maturity 154:22 155:2 157:20 343:18 | measures 70:10,14 73:10 445:15 |
| manures 210:1,3 | marks 217:16 | matters 15:3 17:22 49:4 285:13 | ma'am 166:20 192:17 370:5 379:8 | measuring 87:3 |
| maps 74:19 | Marty 510:22 519:15,16 522:17 | matters 15:3 17:22 49:4 285:13 | McEVOY 2:12 5:1 35:21 102:7 153:12 285:19 | meat 138:15 143:22 144:5 147:15 |
| Maravell 1:20 12:13 39:1 42:12 118:16 131:22 159:21 160:4,17 181:21 185:8 262:13 265:16 375:18 376:21 412:2,6 413:3,14 413:22 415:3 448:19 449:22 472:2 | Maryland 229:14 | matters 15:3 17:22 49:4 285:13 | McManus 211:11 213:18 | meats 136:7 149:8 |
| masses 441:2 | massive 461:2 | matters 15:3 17:22 49:4 285:13 | meal 56:14 67:14 68:2,8,13 82:9,22 95:15,21 96:6 101:10 137:18 143:22 144:2 157:11 161:8 168:22 431:3 | mechanism 14:3 15:1,21 17:3,14 17:20 23:14,22 25:13 29:18 39:22 307:9 |
| Master's 229:3 501:1 | match 48:9,10 100:18 | matters 15:3 17:22 49:4 285:13 | meals 147:15,15,16 149:9 | mechanisms 36:8 |
| material 8:13,21 18:10 28:1,7,19 29:2,6,13 122:10 122:13 140:22 199:14 200:1,3,4 201:21 202:3,4,13 202:22 203:2,20 206:4 220:6,13 221:20 224:21 227:14 246:9 247:21,22 248:20 251:16 252:7,8,19 259:6 260:10 270:2 272:18 273:2,10,20 274:10 277:12 279:7 284:4 290:2 301:3,14 306:6,7 307:4 311:22 315:2 317:18 | materially 29:16 | matters 15:3 17:22 49:4 285:13 | media 35:16 | medical 23:10 |
| match 48:9,10 100:18 | material 8:13,21 18:10 28:1,7,19 29:2,6,13 122:10 122:13 140:22 199:14 200:1,3,4 201:21 202:3,4,13 202:22 203:2,20 206:4 220:6,13 221:20 224:21 227:14 246:9 247:21,22 248:20 251:16 252:7,8,19 259:6 260:10 270:2 272:18 273:2,10,20 274:10 277:12 279:7 284:4 290:2 301:3,14 306:6,7 307:4 311:22 315:2 317:18 | matters 15:3 17:22 49:4 285:13 | meals 147:15,15,16 149:9 | medical 23:10 |

| | | | | |
|--------------------------|--------------------|--------------------------|--------------------------|--------------------------|
| 297:8,17 501:11 | 37:8,14,22 38:3,6 | 310:16 311:17 | 41:19 43:20 78:8 | metabolism 140:11 |
| medications 72:5 | 38:12,13,14,15,16 | 313:5 314:14,15 | 79:5,7 93:1,9 | metabolite 76:13 |
| 346:17 347:10 | 38:17,18,19,20,21 | 315:14 317:12 | 118:13 130:12,19 | metagenomic |
| medicine 45:19 | 38:22 39:1,2 40:5 | 324:20 325:2,8 | 141:12 186:16 | 213:19 |
| 228:21 229:4,11 | 40:8,12,15 41:4 | 326:4,20 328:22 | 195:13,21 243:3,8 | metallic 319:9 |
| 229:14,15 230:9 | 42:1,2,3,4,5,6,7,8 | 330:2,13 334:4 | 283:7 285:20 | meter 73:14 81:2 |
| 231:14 239:22 | 42:9,10,11,12,13 | 335:9 338:19 | 286:1,2 342:15 | 86:9,20,21,22 |
| 240:2 260:20 | 48:7 79:10 81:3 | 340:9 348:4,21 | 380:6 381:2 | meters 79:13 80:6 |
| 501:1 504:2 | 84:7 85:16 87:17 | 349:3 355:4 357:5 | 382:12 383:19 | methionine 96:1 |
| Medicine's 230:15 | 89:1,17 90:12,16 | 363:14 364:10,12 | 384:5 407:14 | 112:19 114:7 |
| medium 426:15 | 91:13 92:9,11 | 370:6 374:13 | 432:16 442:8,21 | 134:11 137:1,7 |
| 443:14 | 98:2,20 101:7 | 375:18 376:21 | 454:4 480:17 | 140:9,9 143:4 |
| meet 67:9 70:5 | 107:17 108:22 | 378:12,16 384:2 | 485:21 490:14 | 147:10 148:16 |
| 71:14 105:4,15 | 109:2,5,10,14 | 385:3,13 390:9,19 | 522:20 523:16 | 153:17,18,21 |
| 135:10,13 136:13 | 115:15 116:4 | 391:5 395:21 | membership 10:19 | 154:21 155:7,13 |
| 137:6 140:13 | 131:12,22 133:6 | 396:16,22 398:8 | 11:3 12:16 | 155:18 156:9 |
| 149:19 193:5 | 139:4 140:18 | 403:4,12 405:2 | membranes 336:1 | 157:22 158:1 |
| 231:7 490:7 | 146:8,19 147:6 | 412:2,6 413:3,14 | memo 430:12 | 160:7 161:7 |
| meeting 1:4 4:4 | 148:18 149:22 | 413:22 415:3,12 | Memorial 45:21 | 182:21 183:7,14 |
| 17:12 25:2,4,12 | 152:6,13 157:2 | 417:7,15,21 418:8 | 230:7 | 183:15 184:13 |
| 26:9,11 27:1 | 159:2,21 160:4,17 | 418:12,15,17,21 | men 65:11 | 185:11 186:17,22 |
| 29:13,14,21 107:9 | 165:18 166:1 | 419:3,15 421:12 | mental 44:4 | 187:10,13,16,20 |
| 107:21 110:9,11 | 172:20 173:19 | 422:8,11 423:1 | mentality 373:18 | 189:8,12 |
| 167:7 169:7 188:9 | 175:1 176:6,20 | 424:7 427:14 | mention 219:20 | method 79:20,21 |
| 191:10 225:11 | 177:2,4 178:13 | 428:10,14,17 | 326:8 330:22 | 120:17 124:5 |
| 249:2 283:3 295:2 | 181:5,18,21 184:5 | 434:21 435:22 | 517:7 | 190:19 314:19 |
| 314:12 342:14,22 | 184:12,21 185:6,8 | 436:17 438:6 | mentioned 9:11,20 | 374:16 410:21 |
| 407:8 412:7 | 191:8 192:11,22 | 439:20 440:21 | 10:8 31:15 35:21 | methodology |
| 413:13 448:13 | 193:7 196:16 | 441:5 446:17 | 66:1,17 85:9 | 374:17 |
| 495:11 519:1 | 204:3 215:21 | 447:15 448:12,15 | 129:11 144:9 | methods 42:19 |
| meetings 15:9,12 | 228:16 230:15 | 448:19 449:22 | 150:15 239:2 | 51:6,13 67:1 |
| 39:10,13 40:17 | 242:18 243:10 | 450:11 451:14,19 | 269:10 295:19 | 71:17 77:7 116:3 |
| 357:20 | 246:7 249:15,17 | 452:8,18 454:1 | 323:15 336:2,11 | 116:10,18,21 |
| meets 356:6 | 251:8,13 252:20 | 457:15 472:2 | 349:5,6 409:21 | 117:1,9,13,17 |
| Melissa 2:16 43:7 | 253:21 256:9 | 474:12 477:3,11 | 454:3 | 118:2 119:14 |
| 108:11 118:15 | 257:13 258:10 | 482:15 484:10 | mercy 508:20 | 121:2,8 122:4 |
| 126:18 127:1 | 260:4 261:22 | 505:22 507:2 | Mesh 510:22 | 123:3,7 125:12,17 |
| 131:13 314:16 | 262:13 265:16 | 514:19 517:13 | 519:15,16,16 | 126:8 130:22 |
| Melody 453:1 | 268:18,19 269:16 | 518:5,9,13,21 | 522:18 | 227:10 381:13 |
| 457:14 | 271:15 272:9 | 519:2,5,10 522:13 | mess 473:21 | 384:10 481:5 |
| Melody's 453:1 | 274:18,20 277:17 | members 1:14 7:12 | message 435:3 | 509:11 510:8 |
| member 7:4 8:1,12 | 278:15 279:17 | 10:7,9,12 12:11 | messages 433:7 | methyl 140:10 |
| 8:17,18 9:7,8 10:3 | 280:1,4,13 281:11 | 13:7 16:19 18:3 | 522:4 | Meyer 453:1,3 |
| 10:5,15 12:9,21 | 281:16,21 283:4 | 20:8,12 24:5,11 | messy 274:1 | 457:18 459:4 |
| 13:3 18:7,15 22:6 | 283:11 284:6,8 | 24:14 28:6 29:11 | met 220:12 299:21 | mic 4:21 |
| 23:4 27:9 29:5 | 285:12 286:9,11 | 29:12,19 30:18 | 315:8 459:13 | Michael 347:1 |
| 32:6,15,16 33:16 | 301:10 305:16 | 32:8 33:11 34:15 | metabolic 140:11 | 495:16 500:12,16 |

| | | | | |
|---------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Michelle 2:14 11:10 22:19 119:10 317:1 343:4 345:22 358:19 365:9 370:7,9,12 | 442:1 444:18 446:11,18,19 451:11 514:4 mid-afternoon 266:15 mid-summer 411:7 415:21 mid-80's 137:10 migrate 257:19 migratory 73:18 171:14 mile 234:12,16 476:9,10 miles 2:12 4:19,21 35:20 43:5 102:6 451:8 494:21 495:11 millennium 520:20 521:2 milligrams 255:4 million 188:19 210:14 254:18,22 257:3 293:13 349:7 380:2 381:3 454:15 478:11 millions 178:19 363:2 mimic 113:6 mind 29:8 125:5 150:6,12 152:15 163:16 240:8 283:18 302:18 316:1 331:3 351:6 354:2 516:2 mine 154:18 169:11 415:6 mineral 221:13 247:22 minerals 78:19 96:11 99:4 115:10 142:11 150:11,12 minimal 496:17 500:1 minimally 70:5 minimize 73:1 76:8 76:9,14 129:3 232:1 271:13 | minimum 67:9 69:16 75:17 87:13 91:4 100:7,20 149:2 157:7 158:20 372:15 455:21 Minnesota 48:1 197:11 minor 189:17 minority 288:14 290:19 296:5,21 297:11,13 298:14 302:16,21 305:17 308:15 309:11 310:5 312:16 313:1 431:16 486:21 487:15 488:11 514:1 minuscule 255:13 255:21 359:19 458:4 minute 22:19 116:6 120:2 168:3 197:1 232:21 281:8 287:14 316:5,16 342:7 392:10 465:10 476:8 minutes 31:10 138:16 141:8 163:15 168:1 194:7 280:21 281:3 310:1 316:16 342:20 359:4 461:15 465:7 486:10 522:21 Miscellaneous 15:6 39:8 misconception 72:8 misguided 445:1 misinformation 457:21 458:20 misleading 460:17 misled 491:13 misperception 443:11,19 444:4 misperceptions | 442:15 mispronouncing 500:13 missed 66:15 154:10 405:4 missing 334:8 mission 217:20 218:4 321:21 493:21 Mississippi 63:8 mistake 138:21 mistakes 151:1 mitigate 300:11 mitigated 146:9 mitigating 308:12 mitigation 204:17 mix 200:9 369:21 460:15 mixed 250:13 360:7 460:12 490:15 mixture 460:18 mobility 410:17 mode 322:9 326:21 329:1,8 330:9 335:20 336:11 339:11 model 170:7 405:14 464:18 models 222:11 225:14 226:7 241:4,6 242:14 258:20 259:12 261:9 268:3,4 399:3 445:12 479:16 moderate 189:17 322:12 modern 123:6 Modernization 231:2 modes 322:6 339:21 modification 11:9 19:8 184:13 modified 19:6 66:22 120:6 125:2 | modify 41:12 192:14 modifying 19:11 Mohamed 149:16 153:8 161:11 moisture 144:6 399:3 401:21 405:21 406:1 mold 324:13 molecular 204:21 263:13,16 264:5,6 264:16 268:3 molecules 250:20 262:8,9 329:21 mollusk 74:12 mollusks 48:20,22 molting 335:2 mom 483:12 moment 8:15 33:7 232:4 313:3 407:3 Monday 40:17 41:7 money 164:14 201:14 245:22 389:3 443:7 monitor 70:8 373:11 monitoring 57:10 57:15 58:10 75:4 223:3 224:5 225:21 226:6 monkeying 472:12 Monosex 66:18 Montana 387:13 month 61:13 258:9 332:7 336:21 410:15 440:9 months 60:16 62:20 74:10 75:16 84:20 118:11 125:7 126:3,16 182:19 331:1 347:15 382:12 430:13 465:2,3,4 470:19 483:1 moored 51:20 morning 4:5,13,19 5:1,3 7:5 9:8 13:3 |
|---------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 22:15 45:1 81:3 149:20 153:11 167:13,21 178:4 194:3 266:15 430:11 437:22 523:20 morphed 287:22 Morris 228:18 229:18 231:3,4 242:19 243:15 244:10 255:8 257:14,21 258:11 260:16 269:16 270:5 306:2 434:10 503:2 mortalities 56:4 mortality 337:16 MOSA 122:19 124:15 291:11 292:7 Mostin 459:7 467:18,20,21 472:11 474:22 477:6,16,18 moth 468:18 mother 178:6 217:9 346:7 motion 29:8 37:15 40:4,6,10 287:15 289:8,9,18 312:6 315:3 motivated 428:19 430:2 434:2 motivation 231:22 Mount 197:22 277:22 mountain 295:15 mountains 442:4 468:1 Mousa 149:16 153:10 157:3,6 159:4 160:2,9,21 161:12 Mouse 178:8 mouth 443:7 mouthful 491:22 move 9:10 13:1 | 32:10 38:3 39:5 68:20 126:17 128:1 129:9 144:22 151:15 226:8 232:2,15,16 238:15 245:9,17 260:1 261:5 276:11 286:12 351:9 385:17,21 397:8 410:18 466:18 moved 86:6 151:14 235:3 285:7,8 287:10 289:9,17 300:16 361:2 495:11 496:3 movement 233:2 236:6 237:17 241:1,8,12 261:15 261:16 295:21 358:17 413:5 moving 60:9 68:21 69:9 107:10 234:21 236:13 289:7 299:10 302:19 397:1 398:3 MRSA 240:9 270:11 mucor 329:18 mulch 5:12 multi 222:5 multiple 74:5 231:19 236:18 237:12 306:12 357:17 473:6 475:1 509:13 multitrophic 53:7 83:5 multitude 67:8 multi-drug 239:10 muscle 149:7 mussel 53:10,22 54:9,14 mussels 53:17,20 54:8,15,17 80:13 80:21 | mutagenic 209:11 mutate 502:22 mutation 122:2 mutations 122:8,9 232:14 333:15 myriad 489:9 M-9 362:10 M.D 229:2 M.S 197:11 204:12 <hr/> N <hr/> N 3:5 4:1 name 23:3 27:8 44:15 161:16 167:15 178:5 182:14 186:11 234:11 321:1 331:9 335:13 344:13 350:4 358:15 359:5 370:15 379:5 392:18 407:4 429:17 441:18 459:9 478:2 490:15 495:19 500:14,16 519:16 519:18 name's 398:6 485:22 507:16 511:1 narrative 223:6 narrower 142:16 nasty 361:1 Natalie 370:13 379:11,15 384:2 386:16 454:2 Nate 478:1 485:19 490:10 Nathaniel 485:22 national 1:2,4,10 2:12,17,18 13:6 13:12,18 19:2 20:9 22:2 28:3 29:7 44:19 45:7 48:12 68:5 100:5 109:22 111:18 117:3,13 141:14 | 216:20 220:8 221:21 222:7,20 224:20 230:4,12 282:10 287:16 290:1 292:14 301:1 311:3,6 312:7 313:19,22 352:17 353:16 357:15 368:2 379:22 382:13 384:8 394:18,19 395:6 429:18 433:13 450:16,20 453:16,18 489:1 492:16 nationally 231:1 nationwide 372:7 native 73:18,19 170:19 174:3,13 174:20 216:11 natural 21:8 61:1 61:10 113:7 134:4 150:3,5 166:5 171:12,18 173:14 207:9 210:18 218:14 294:13 318:13 322:3 323:16 346:17 367:1 494:3 512:22 naturally 165:3 166:16 318:9 337:6 359:12 465:11 492:4 naturally-occurr... 214:6 nature 90:15 488:10 494:11 505:8 Nature's 193:17 navigate 437:7 Neal 441:15 452:22 453:1 near 81:19 166:14 201:12 267:12 278:3 nearby 520:13 | nearly 399:7,15 necessarily 31:21 254:13 271:2 322:7 354:2,12 407:13 408:22 necessary 75:17 76:18 94:21 102:18 118:8 159:22 160:7,10 299:19 345:19 347:6 495:8 necessitates 394:16 necessity 374:15 497:21 necks 155:4 need 34:1 37:14 41:12 81:5 100:7 103:4,5,9 106:6 117:16 121:7 123:15,19 126:1,1 129:21 130:2 131:15 136:10 137:14 140:8 145:15 148:14,22 151:19 153:16 154:13 156:7 157:8,21 160:15 172:9 193:20 199:6 232:11,12 232:12 244:20 245:16 260:21 265:10 267:22 273:10 286:4,7 291:19 294:18 296:12 300:15 306:3,5 307:18 316:9 323:7 338:21 344:2 368:5 373:16 381:12 382:19 384:22 385:6 386:9 389:6 401:13 402:6,22 403:9 404:10,16 404:18 405:7 406:6,8,9,16 411:1 425:21 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|---------------------------|----------------------------|---------------------------|---------------------------|---------------------------|
| 426:10 431:10 | Neither 332:16 | 359:6,8 366:9 | non-approved | 361:1,3,8,12 |
| 432:22 435:5 | Nelson 46:6 | 401:4,14,15 402:1 | 369:3 | 362:18 363:18,22 |
| 450:13 451:12 | nervous 87:11 | 402:16,17 413:1 | non-chemical | 364:3 |
| 457:3 461:19 | 266:16 | 430:17 444:6 | 71:17 | Northern 122:19 |
| 462:6 464:5,21 | net 49:5 51:4 58:13 | 468:13 469:18 | non-culturable | northwest 213:2 |
| 467:2 477:14 | 65:12 73:17,20 | 470:10,16 471:10 | 211:12 | 277:18 291:7 |
| 482:9 501:17 | 74:7 79:19 80:9 | 471:11,20 472:6 | non-lethal 504:17 | 293:12 362:17 |
| 505:16 508:18 | 80:16,17 85:18 | 473:13 500:22 | non-profit 167:17 | 364:4 379:18 |
| 509:4 510:6 | 86:4,19 90:11 | 502:18 504:7 | 519:17 | 387:9 393:2 |
| 515:21 523:17 | 168:13,19 169:14 | 508:6 510:14 | non-sentient 77:15 | 403:20 406:2 |
| needed 30:8 100:20 | 169:22 170:4,7,17 | newly 228:18 | non-sprayed | 407:12 426:4 |
| 153:3 192:14 | 175:15 177:19 | nice 79:2 320:10 | 213:17 215:9 | 441:20 454:11,14 |
| 202:18 287:8 | 430:18 | 463:19 518:21 | non-treated 214:16 | 454:17 455:6 |
| 288:17 300:1 | Nets 74:2 | NICHOLAS 1:20 | 515:17 | Norway 86:18 |
| 320:12 346:19 | netted 64:1 | Nick 12:13 118:15 | NOP 1:2 15:13,19 | NOSB 1:5 8:18 |
| 366:22 381:20 | networking 342:21 | 131:11,21 133:6 | 16:2 19:5,13,21 | 14:21 15:5,9,10 |
| 391:1 400:1,15 | never 27:15 214:1 | 159:20 181:20 | 27:22 28:20 30:3 | 15:13 16:2,5,20 |
| 455:13 497:14 | 275:22 301:19 | 185:7 375:17 | 39:11,14,20 40:3 | 17:11,21 19:10,13 |
| needle 265:5 | 333:2 361:19 | 412:1 448:18 | 40:19 94:19 | 20:18,21 26:20 |
| needles 266:9 | 447:9 449:11 | 472:1 | 103:15 110:7 | 27:21 28:6,20 |
| needs 67:10 69:17 | 464:16 469:19 | night 127:1 264:20 | 118:15 123:12 | 29:1,5 30:4 36:3 |
| 117:5 118:4 123:2 | 472:22 474:2 | 434:8 465:14 | 283:1 296:1 | 37:22 39:7,10,11 |
| 154:20 177:12 | nevertheless 61:9 | nights 63:20 276:9 | 304:10 311:14 | 39:14 40:3 48:7 |
| 222:11 245:3 | new 8:1,12,13,17 | nine 133:8 387:4 | 314:11 332:17 | 48:18 49:1,6 57:1 |
| 305:4,10 309:10 | 8:18 9:7 10:5,6,9 | 454:12 | 354:7,13 383:17 | 66:5,8 68:2,5 93:1 |
| 309:17 351:20,22 | 10:12,15 12:16 | nitrogen 153:20 | 388:20 412:21 | 93:7 94:18 102:11 |
| 382:15 383:4 | 14:11 15:7 17:5 | 176:16 372:15 | 430:13 452:3,6 | 102:19 106:2 |
| 386:14 402:9 | 19:6,9,12,14 | NOB 23:16,18,22 | 494:8 497:6 | 117:4,8,11 118:16 |
| 434:17 449:10 | 29:12 30:14 31:4 | 24:5,11,14,22 | NOP's 39:16 | 124:9 132:5 |
| 460:19 462:11 | 32:14 33:6 36:18 | 26:3 | Nora 347:12 | 141:19 149:10 |
| 467:1 507:22 | 37:22 39:8 54:3 | Nobel 504:8,10 | normal 52:19 | 153:11,12 154:6 |
| 517:10 519:21 | 93:2 96:8,20 | NOB's 15:14 | 110:21 111:4 | 169:6 292:11,20 |
| nefarious 483:22 | 121:8 123:4 | NOB-N.O.P 19:7 | 240:16 258:8 | 298:4 301:14 |
| negative 170:13 | 148:17 196:12 | 20:16 | 269:20 417:19 | 302:8 304:8,17 |
| 175:18 325:4 | 200:5 201:20,22 | NOC 291:4 295:17 | 421:8 423:8 | 305:8 350:18 |
| 334:14 335:1 | 224:15 229:20 | nodes 6:7 | 484:18 503:5 | 353:10,12 354:5 |
| 337:19 | 231:18 236:12 | NODPA 122:19 | normalized 421:21 | 367:6 369:5 |
| neglected 154:14 | 240:21 241:8 | non 71:16 134:22 | normally 337:20 | 380:15 395:5 |
| negligently 505:7 | 242:7 250:20,20 | 215:11 221:12 | 352:19 414:16 | 436:12 490:15 |
| negligible 315:9 | 252:10 259:9 | 337:7 363:7 | 502:10 | 494:8 499:12,18 |
| 338:11 | 261:3 273:16 | 381:17 394:12 | norms 225:17 | 511:5 |
| neighbor 451:8 | 282:18 287:10 | 395:12 480:21 | north 186:5 188:2 | NOSB's 39:15 |
| 476:9 | 303:12,17 314:3 | 493:16 | 295:14 303:12 | 131:10 353:17 |
| neighborhood | 321:16 323:11 | non-antibiotic | 347:12 453:20 | NOSB-N.O.P |
| 198:1 | 326:10,21 327:19 | 345:14 414:9 | 468:1 486:10 | 21:17,19 |
| neighbors 396:12 | 332:5 339:11 | 478:16 482:4 | 494:21 | note 110:14 116:17 |
| 427:1,5 | 343:17 353:5 | 508:5 509:11 | Northeast 360:8 | 117:1 219:14 |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>noted 11:5,16 110:17 350:20 353:19 notes 194:9 noteworthy 24:8 337:15 notice 25:12 62:5 102:15 137:21 noticed 79:10 98:8 190:2 notified 26:12 notify 302:1 novel 65:13 November 313:17 no's 289:19 315:10 NRC 134:13 136:4 148:4,5,7,9,11 NRD 136:3 number 29:10 52:21 53:20 54:12 57:3 65:11 69:13 80:3 87:3 95:15 101:17 105:13 122:16 140:5 179:17 215:12 217:19 218:7,9 219:15 256:22 262:4 266:13 271:1 276:12 282:12 290:6 303:13 315:4 339:18,20 341:10 356:4 375:4 396:5 416:6 454:9 459:13 461:21 466:16,17 numbers 12:4 83:6 83:16,17,18 84:4 219:19 238:14 268:10 361:10 393:6 numerous 169:8 195:14 297:21 298:18 321:22 501:10 nurse 346:16 nurseries 426:4</p> | <p>nursery 55:19 63:16 nut 321:7,9,14 nutrient 62:7 183:20 220:19 nutrients 53:15 58:4 75:16,17 80:3,6 81:1 89:21 90:14 91:20 135:16 140:16 145:3,12 151:13 151:20 nutrient-dense 145:17 nutrition 95:12 133:20 134:1 135:15 137:19 230:16 454:22 nutritional 67:9 69:17 70:2,5 135:6 137:12 nutritionist 138:11 nutritionists 142:19 nutritive 200:21 nutshell 173:2 NWHC 292:13 N.O.P 15:15 23:16 23:21 25:13</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>O 4:1 OAB 365:19,22 366:5,13 368:5 369:5 object 21:12 365:5 objected 21:9 22:4 objection 33:9,11 Objections 294:8 objectively 393:11 objectives 95:13 264:14 obnoxious 22:21 141:9 observation 445:13 observations 226:19 227:12</p> | <p>observe 179:1 227:16 234:4 obtain 215:6 obvious 244:19 obviously 4:15 51:5 65:1,8 72:1 85:4 105:7 113:12 118:22 126:10 142:14 181:12 194:13 237:9 326:17 331:2 343:14 415:10 428:2,18 434:1 519:22 OCA 290:22 occur 326:16 503:1 occurred 94:17 99:12 211:2,4 254:9 520:19 occurrence 226:3 228:8 484:18 occurring 254:12 337:6 359:13 407:19 465:11 492:5 occurs 236:19 424:4 502:19 ocean 51:21 54:22 55:7 56:8 62:12 91:18 170:17 175:16 oceanic 96:10 oceanographic 74:20 oceans 91:15 176:2 Ocean's 173:8 ocean-based 86:16 October 43:8 154:8 188:9,14 282:14 286:16 287:11 289:11,16 352:11 355:20 366:2,11 366:16,19 369:6 465:2 491:6 odd 112:1 472:19 offended 195:20,21 offer 29:8 177:13</p> | <p>442:15 offered 21:10,13 191:21 offering 301:11 offers 497:11 office 127:10 230:2 officer 11:11 229:7 officers 11:20 official 14:4 20:4 48:15 344:9 officially 246:1 officials 111:22 112:4 434:8 offset 146:21 147:1 off-farm 500:2 OFPA 18:20 22:1 31:7 169:20 170:16 297:2 300:22 301:9,13 301:15,17 302:5 353:9 489:3 492:12 OFTA 291:11 oftentimes 401:21 often-added 113:2 OGC 380:11 oh 5:2 10:3 12:6,9 37:16,18 109:8 124:15 165:6 166:20 191:3,6 272:10 280:2 324:22 370:4 396:2 404:11 428:12 449:5 465:12 477:6 518:21 Ohio 344:18 oil 56:15 67:14,20 68:8 69:18 82:9 82:22 101:10,13 101:14,21 102:2 431:3 488:13 oils 101:11 372:19 okay 5:1 7:4 9:17 10:3 18:16 22:11 32:2 36:14,17 37:20 41:21 57:6</p> | <p>77:20 90:16 91:13 104:20 109:11,14 115:21 121:12 124:20 142:20 167:2,6,10 173:11 185:6 192:11,22 193:3 194:2,2 234:20 243:7,7 260:4 267:19 272:10 280:3,13 281:11 283:11 285:14 289:7 290:13 296:21 301:10 310:10,11 310:16 311:17 315:17 324:22 335:9 341:9 343:2 349:22 360:20 362:14 370:6 374:18 375:16 376:19 377:9 379:9 392:22 404:22 407:2 413:14 417:21 418:15,21 421:6 424:18 429:16 436:20 440:21 448:15 452:18 461:12 462:3 465:9 473:12 477:8,16 500:11 507:2,3,15 518:9 okra 64:20,22 old 54:11,13 61:13 62:20 63:17 67:17 95:2,3 102:10 156:5 400:6 468:3 473:21 older 63:17 102:12 102:19 114:1 270:6 273:18 oldest 217:17 468:2 523:6 omega-3 101:15,20 omega-6 101:14 omega-6s 102:3 omega-6's 101:18</p> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|---------------------------|----------------------------|---------------------------|--------------------------|-------------------|
| omnivores 155:8 | operation 60:5 | opposed 51:17 71:3 | 442:3 458:8 | 13:10,15,16,18,21 |
| OMRI 122:19 | 62:10 64:17 65:4 | 135:14 169:11 | 512:16,17 | 16:14,20 20:9,13 |
| 123:9 124:16 | 65:10,14 129:18 | 196:9 233:16 | orchards 23:9 | 23:15,18 24:15 |
| 202:21 523:13 | 157:4 176:7 | 275:14 296:3,22 | 198:7,11 199:8 | 25:6 26:14,19 |
| once 65:15 81:17 | 184:15 187:17 | 360:11 | 203:3 205:12 | 27:16 30:18,22 |
| 164:3 224:10 | 222:21 223:15 | optimizing 384:9 | 211:1 212:20 | 31:3 44:5,19 45:8 |
| 241:9 259:16,19 | 224:2 295:10 | optimum 87:2 | 213:17,20,22 | 47:6,7,12,19 48:2 |
| 261:12 324:10 | 359:9 362:19 | option 286:22 | 215:12 234:2 | 48:4,9,10,12 |
| 344:3 353:15 | 471:21 486:9 | 287:1 356:16 | 239:4,15 254:4 | 49:17 50:8 51:14 |
| 415:1 441:9 | 513:2 | 438:20 474:19 | 263:8 264:10 | 52:11,16 59:13 |
| 449:12 481:12 | operationalize 92:7 | 515:16 521:16 | 265:1 266:22 | 61:7 62:9 65:2,16 |
| ones 61:2 139:1 | operations 7:15 | options 124:1 | 268:9 292:4 | 66:6 67:3 70:11 |
| 142:22 143:5 | 49:16,18 61:6 | 270:12 275:5 | 343:15,17 363:2,7 | 70:12 71:14 73:4 |
| 166:21 172:9 | 62:4 66:10,13 | 355:15 356:16 | 377:10 382:6 | 74:17 75:20 76:4 |
| 184:10 193:18 | 73:21 103:1,11 | 368:22 444:21 | 393:4,7 394:2,3 | 84:17,19 85:6,9 |
| 276:5 376:3 | 104:11 106:15 | 447:13 | 411:4 425:7 | 85:18,21,22 86:11 |
| one's 409:21 420:4 | 129:11 177:16,18 | OPWC 381:2,22 | 443:12 445:4 | 88:15,21 89:2,11 |
| One-half 46:13 | 219:22 361:15 | 382:12 383:12,19 | 446:12 468:6,17 | 89:12,16,16 95:14 |
| one-word 485:9 | 396:5,7 397:4 | oral 9:12 12:19 | 469:14 479:10,14 | 96:3 97:11,15 |
| ongoing 7:18 33:1 | 488:6 500:19 | 255:3 | 480:5 481:12 | 99:18 102:22 |
| 36:2,12 227:6 | operative 147:4 | orchard 205:8 | 495:5 503:12,13 | 103:2,11,13,19,20 |
| onions 319:17 | operator 468:4 | 207:2 208:4 211:7 | 506:8,18,20 | 104:2,4,8,11,15 |
| online 14:3,8,22 | 486:8 | 215:10 222:9 | 512:13 | 105:2,4,10 106:15 |
| 16:2 17:2,19 | operators 362:20 | 242:3 244:13,17 | order 11:17,18 | 108:10,20 110:1 |
| 23:14 24:7 25:12 | opinion 132:14 | 245:4 256:20 | 29:4 69:7 100:7 | 111:12 114:10 |
| 40:2 | 281:15 288:13,14 | 263:2 266:18 | 116:8 117:8 | 115:12 119:1 |
| onsite 265:11 | 291:10 292:6 | 273:9 284:1 356:2 | 121:10 190:19 | 141:2 143:15,19 |
| on-site 226:11 | 296:4,5,21 297:11 | 359:8 362:18 | 336:20,21 354:15 | 143:22 145:19,20 |
| open 51:8 58:13 | 297:13,16,17 | 367:13 372:15 | 382:5 383:2 446:8 | 145:21 151:13,18 |
| 70:21 80:11 83:4 | 323:1 414:1 | 373:11 389:11 | 481:15 485:13 | 151:22 152:9 |
| 86:2 88:9 90:1,10 | 436:15 437:10 | 399:20 400:16 | ordered 426:7 | 157:10,13 163:7 |
| 91:15,18 92:5 | 467:7 515:8 | 411:6 415:20 | orderly 129:3 | 164:1,12,15,17,19 |
| 168:19 170:17 | opinions 442:9 | 424:17 427:4 | orders 86:8 | 165:6 167:18 |
| 175:16 194:13 | 460:19,22 486:19 | 441:20 443:1 | Oregon 1:12 197:9 | 168:17,18 170:2 |
| 242:19 243:5 | opportunities | 445:12 447:7,8 | 204:8 292:20 | 172:1,2 173:6,7 |
| 430:18 431:10 | 227:7 | 449:9,12,13,14 | 303:9 345:22 | 173:12 175:2,14 |
| 483:19 484:6 | opportunity 4:8,18 | 455:19 456:1,4 | 387:13 392:20,22 | 176:3 177:14,14 |
| opening 35:22 | 17:5 34:17 44:19 | 459:11 462:10 | 393:10 394:19 | 177:17 179:11 |
| 110:8 272:20 | 49:14 106:20 | 463:15,21 464:16 | 401:18 449:19 | 186:2,13,15 187:3 |
| 283:2 311:15 | 149:19 167:14 | 468:3 472:7 479:6 | 496:22 509:2 | 188:16,19 189:22 |
| 314:11 | 205:2,3 217:2 | 481:9 485:11 | 511:4 518:4,8 | 193:12 198:11 |
| operate 441:19 | 242:6 259:1 | 513:13 | 523:13 | 199:12 201:14 |
| 468:6 493:3 | 320:22 340:3,15 | orcharding 427:7 | OREI 198:13 | 202:16,21 203:2 |
| 495:22 520:3 | 383:21 392:21 | orchardist 425:20 | 294:15 299:2 | 216:2,7,9,14,18 |
| operated 359:7 | 397:14 468:10 | 455:17 480:16 | 408:4 414:6 | 216:21 217:5,10 |
| operating 129:12 | 469:6 519:8 | orchardists 373:10 | organic 1:2,4,10 | 217:11,13,14,20 |
| 129:13 | oppose 431:16 | 373:14 407:12 | 2:13,17,19 13:6 | 217:22 218:1,3,7 |

| | | | | |
|-------------------|-------------------|--------------------------|----------------------------|---------------------------|
| 218:9,15,16,21 | 376:2 377:3 | 488:4 490:19,22 | 292:5 294:12 | 449:2 459:15 |
| 219:1 220:2,6,9 | 379:17,21 380:3,8 | 491:16,21 492:10 | 493:14 | 514:1 523:11 |
| 222:2,7,20,22 | 380:9,13,16,20 | 494:5 495:3,7 | organophosphate | outstanding 324:12 |
| 223:5 224:16 | 381:3,8,10,12 | 496:2,5,16,18,20 | 468:19 | out-compete |
| 225:17 226:5 | 382:4,10,13,15,22 | 497:2 498:1,19 | organophosphates | 469:16 |
| 248:3 249:3 | 382:22 383:3,6 | 499:13,19 505:13 | 468:21 469:2 | out-competes |
| 253:14 254:1 | 385:7 386:21,22 | 505:14 507:18 | organs 336:3 | 470:1 473:12 |
| 260:6,15 267:7 | 387:3,10,11,22 | 508:1 510:9 511:5 | origin 66:16 484:20 | ovary 158:3,5 |
| 272:3 278:4 279:7 | 388:1,2,2,7,10,13 | 511:10,15,21,22 | 485:3,9 | overall 181:15 |
| 284:21 287:17 | 389:2 391:6,20,20 | 512:3,4,19 513:2 | original 237:1 | 237:19 238:9,19 |
| 289:13 290:1 | 392:3,9 393:4,7 | 513:6 514:3,7 | 286:17 311:13 | 239:13,17 241:14 |
| 291:5,7,16 292:2 | 393:14,16 394:2,6 | 515:14,20,22 | 457:5 492:12 | 256:3 260:8,13,17 |
| 292:18 293:12,13 | 394:7,8,19 395:18 | 516:5,7 517:19 | 520:5 | 261:16 307:6 |
| 293:18 294:15,19 | 395:22 396:11,18 | 519:18,19,22 | originally 169:14 | 309:15 427:17 |
| 294:21 295:13 | 397:1,7,14 398:10 | 520:1,21 521:13 | 355:9 | 515:7 |
| 297:3,20 298:8,12 | 398:11,22 399:15 | 521:19 523:12 | OTA 21:7 291:15 | overarching |
| 298:16 299:18 | 401:6 402:10 | organically 53:5 | 291:22 292:1 | 350:13 |
| 300:13,14,16,20 | 407:6,11 409:8 | 187:18 291:6 | 523:13 | overfeeding 189:19 |
| 301:4,8 302:2,12 | 414:6,10 422:14 | 318:17 379:15 | OTCO 395:3 | overlap 126:9,11 |
| 302:13 303:3 | 425:1,4 426:21 | 386:3 389:13 | OTFA 293:22 | overload 101:18 |
| 305:7,13 306:9 | 427:4,18,20 428:7 | 425:2 426:22 | ought 66:9 | overloading 210:6 |
| 308:6 309:10,11 | 429:21 431:9 | 447:9 490:17 | outbreak 369:1 | overly 113:15 |
| 311:4,21 312:8 | 432:18,21 433:4 | 520:6 | 449:16,18 479:18 | 182:2 |
| 318:6 319:8 320:3 | 433:17,19 434:4 | organics 27:14 | outbreaks 360:22 | overruns 6:4 |
| 321:13,17,20 | 434:16 435:10 | 293:11 374:3 | 371:17 373:12 | overseas 50:9 |
| 322:1 324:4,9,17 | 438:9,19 439:4,10 | 375:14 376:16 | outcome 129:5 | 85:21 344:11 |
| 325:15 326:22 | 440:4,17,19 441:1 | 380:7,9 385:12 | 351:1 376:18 | overseeing 156:17 |
| 327:13,20,22 | 441:10,12,19,21 | 388:4 397:15 | 382:9 | oversees 216:8 |
| 328:2 332:10 | 441:22 442:3,8,19 | 454:7,13 489:15 | outdoor 30:9,21 | oversight 295:22 |
| 333:9,22 338:21 | 442:21 443:6 | 512:1 513:21 | outdoors 163:8,10 | 299:17 304:20 |
| 339:1 343:10,11 | 445:6,14 446:6 | 516:4 517:16 | 163:12 164:2,4 | 305:3 352:9 |
| 343:13,14,15 | 447:7 448:5,5 | organic-based | 185:21 186:3 | 353:18 354:6,15 |
| 344:9,21 345:16 | 453:9,10,12,16,17 | 187:9 | 194:11 | 356:9,18 357:1 |
| 345:18 346:8,11 | 453:20 454:1,6,8 | organic-laying | outline 19:11 | 364:15 383:17 |
| 346:11 347:5 | 454:9,10,19 455:3 | 182:17 | outlined 28:12 | overstate 479:3 |
| 350:6,18,20,22 | 455:5,7 456:6 | organism 251:21 | 29:18 220:11,13 | overuse 323:5 |
| 351:4,13 352:2 | 458:8,14,15 | 497:9 | 225:21 265:21 | 327:3 |
| 353:19 357:15 | 459:11 464:9 | organisms 75:5 | 280:20 411:15 | overused 323:1 |
| 359:7,10,15 | 466:14 468:5,7 | 211:2 239:14 | outpatient 270:12 | overwhelm 265:5 |
| 360:13,14,15 | 469:7,9 474:7,8 | 259:2 338:3,16 | outright 442:13 | 479:18 |
| 361:7,11 365:14 | 474:19 477:4 | 360:1 502:8 | outs 392:4 | overwhelmed |
| 365:15,20 366:4 | 478:3,5,6,10,12 | organization 50:4 | outset 175:6 | 24:16 |
| 367:11,20 368:2,3 | 480:18 481:5,11 | 175:2 240:5 | outside 6:11 15:11 | over-exploited |
| 368:6,15,17 369:4 | 481:13,21 482:1,6 | 269:18 442:2,20 | 27:12 39:12 74:6 | 67:16 |
| 369:19,20 370:10 | 482:11 483:7,14 | 444:1 487:5 | 112:2 140:2 | over-usage 327:15 |
| 371:2 372:6 | 483:21 486:5,9,13 | organizations | 163:18 393:16 | oviduct 158:3,5 |
| 373:13 374:21 | 486:15,19 487:10 | 122:16 291:9 | 394:7 419:1 434:4 | owned 379:18 |

| | | | | |
|---------------------------|----------------------------|---------------------------|---------------------------|---------------------------|
| owner 468:4 486:8 | Pamela 370:15 | 243:14 280:14 | Pat 345:12 | 295:12 296:16 |
| owners 145:9,9 | pancreas 155:21 | 496:19 | patch 163:13 | 344:21 361:1 |
| oxy 207:8,9,15 | panel 196:18,21 | participation 24:3 | pathogen 198:22 | 372:1 374:21 |
| oxygen 64:7,8 | 242:20 262:17 | 28:10 131:10 | 199:1 204:18 | 375:1,22 377:2 |
| 153:21 | 278:18 300:6 | 132:9 | 211:19 212:8 | 381:5 393:8 |
| oxytet 253:15 | panelists 195:7 | particles 210:20 | 237:18 238:19 | 400:18,20 401:11 |
| 257:17 260:14 | 243:4 | 279:14 | 261:15 262:22 | 404:14,15 422:14 |
| 474:19 | panels 112:12,16 | particular 20:10 | 263:2,9 264:10,18 | 427:22 431:18 |
| oxytetracycline | paper 136:13 177:1 | 60:8 70:22 75:18 | 268:8 | 444:19 453:8,12 |
| 204:1 207:8,19 | 224:18 254:5 | 232:9 235:16 | pathogenic 211:1 | 454:6 456:21 |
| 208:3,13 219:8,13 | 348:12,18 349:5 | 236:17 256:19 | pathogens 54:1 | 465:3 467:21 |
| 222:4,10 226:3 | 349:11,13,21 | 266:5 277:20 | 211:4,13,15 | 469:10 470:3,6 |
| 244:2,7 267:21 | 354:20 379:2,4 | 286:7 310:5 357:1 | 212:14,18,20 | 474:5,20 476:11 |
| 286:14 288:8 | 408:20 464:20 | 371:13 429:1 | 215:18 228:19 | 478:18 486:15 |
| 292:13 298:5 | papers 25:17 | particularly 49:5 | 231:20 238:16 | 491:21 498:2 |
| 363:17 366:2 | 230:17 | 50:11 63:20 70:20 | 240:6,19 260:2 | 510:10 512:14 |
| 368:18 369:6,8,11 | paragraph 282:11 | 83:4 96:10 114:4 | 306:20 308:16 | 523:12 |
| 369:17 393:3,13 | parasites 72:4 | 114:9 142:7 219:6 | 333:19 360:5 | pears 217:11 218:9 |
| 409:9,16 410:15 | 170:21 174:16 | 238:4 244:22 | 408:8 498:17 | 218:21 220:2 |
| 410:17 431:18 | parasiticides 72:4 | 270:10 408:4 | pathology 69:1 | 277:20 278:2,4 |
| 453:5 463:6 468:9 | Pardon 37:19 | 511:7 | 197:8,10,11 204:8 | 282:13 287:13 |
| 486:14 487:1,11 | part 13:13 41:1 | parties 282:4 | 204:11 370:17 | 289:16 295:14 |
| 487:13,18 488:3,5 | 43:13 102:17 | 357:18 380:18 | 470:4 | 296:8,11,12 298:8 |
| 489:22 508:9 | 109:12 124:11 | partly 513:6 | patients 231:12 | 303:7,14 343:13 |
| oxytocin 363:16,16 | 126:14 131:8 | Partners 291:4 | Patricia 118:13 | 344:9 346:10 |
| oyster 46:6 60:19 | 141:21 148:14 | 295:18 380:7 | pattern 267:5 | 348:8 355:19 |
| oysters 47:10 60:9 | 170:7 191:14 | parts 210:14 | 421:8 | 367:21 380:22 |
| 60:10,12,16,21 | 198:8 201:5 220:1 | 224:14 254:18,22 | patterns 304:4 | 381:4 388:1,13 |
| 61:1,1,6,12,13,18 | 227:22 234:7 | 257:3 262:4 349:6 | 429:8 508:21 | 389:9 392:9 393:2 |
| o'clock 4:4 523:19 | 238:22 243:12,18 | 446:11 | Patty 211:11 | 399:16 404:4,7 |
| | 246:16,17 251:8 | party 103:17 110:4 | 213:17 424:21 | 406:18 409:8 |
| | 254:6 262:6 275:8 | 311:9 | 429:14,17 436:1 | 425:8 454:19 |
| | 281:19 284:14 | part-time 359:9 | 438:6 439:20 | 455:1,4,20 458:13 |
| | 285:1 288:9 289:5 | part-way 281:9 | 441:14 | 458:15 462:14 |
| | 304:22 307:13 | pass 22:9 133:2 | Paul 167:21 176:1 | 478:6,10 482:2 |
| | 321:21 323:8 | 364:10,11 | Pause 10:2 | 487:17 488:1,4 |
| | 332:14 340:9 | passed 99:3 187:21 | pay 134:16 176:1 | 511:11 518:14 |
| | 342:21 354:12 | 354:20 358:21 | 191:21 | peck 183:11 |
| | 357:12 362:18 | 436:8 506:2 | paying 134:12 | pecking 183:1,22 |
| | 390:16 413:5 | passing 170:9 | pea 5:7 55:6 | peer 31:8 |
| | 415:4,5,7 459:14 | passion 150:1,2 | peach 208:5,6 | peer-reviewed |
| | 463:2 484:6 | passthrough | peanuts 319:18 | 230:17 |
| | 488:14 503:5 | 130:17 | pear 164:19 196:20 | pen 58:13 73:21 |
| | participants | pasture 30:9 | 211:10 219:7,10 | 80:17 85:18 86:4 |
| | 380:12 | pastures 239:3 | 219:15,17 277:22 | 169:14 170:4,7,17 |
| | participate 132:18 | pasture-based | 278:13,14 282:6 | 171:17 175:16 |
| | participating 132:3 | 187:8 | 284:21 291:16 | 430:18 |

P

P 4:1
pace 382:2
Pacific 173:7 213:2
362:17 393:2
407:12 426:4
packing 390:16
page 15:7 39:8,17
147:7
pages 287:21 288:4
338:22 345:4
paint 235:18
Palin 495:19
Pam 365:10 370:12
370:12 374:11
375:18

| | | | | |
|----------------------------|---------------------------|----------------------------|----------------------------|----------------------------|
| Penetrate 5:22 | 502:1,3 503:22 | 111:14 150:17,18 | 197:2 231:10 | 109:18 110:3,6,10 |
| penicillin 504:9,10 | 515:9,10 | 203:7,9,12,14,19 | 285:20 414:4 | 110:16 113:19 |
| 504:14,21 505:1,3 | people's 167:1 | 258:8 272:13,21 | 436:5 466:2 467:8 | 142:6 147:7 188:8 |
| 505:5,8 506:1 | 274:21 | 273:2,5,7,7,21 | 467:9 507:21 | 196:19 281:22 |
| Pennsylvania | perceive 88:16 | 274:2 276:16 | 508:11 514:21 | 282:3,8,21 284:14 |
| 188:1 | perceived 395:10 | 283:3 311:16 | 515:6 | 286:15,17 287:7 |
| pens 49:5 73:17 | percent 67:5 68:4 | 314:12 401:20 | pertain 224:14 | 287:16 290:18 |
| 74:6,7 79:19 80:9 | 76:4 105:9 137:7 | 405:12,12,18 | pertaining 13:15 | 291:2 293:7 |
| 80:16 86:19 90:11 | 144:6 172:2 173:7 | 445:17,21 463:9 | pertinent 393:19 | 304:12 310:18 |
| 90:15 168:13,19 | 173:11 184:8,10 | 469:13 521:20 | perturbation | 311:1,13,13,19 |
| 169:22 177:19 | 188:19 189:13 | periodic 486:6 | 258:13 | 313:9,11,16,18 |
| Pentacles 5:6 | 210:2 211:20 | periodically 440:16 | perturbations | 314:6,9,9,18 |
| people 5:2,3 7:22 | 218:8,10 219:10 | periods 14:5 15:12 | 258:22 | 331:17 335:16 |
| 8:15 9:2 22:12 | 234:18,19 235:7 | 39:13 199:6 | pest 71:19 220:9,16 | 340:10 341:10,13 |
| 33:22 34:12 45:13 | 235:11 237:7 | 278:21 308:19,19 | 221:1 225:2 | 341:15 344:8 |
| 48:1 54:12 57:3 | 239:6,8 260:8 | permanent 225:8 | 319:16,17 321:12 | 371:1 412:17 |
| 57:12,13 58:16 | 336:20 361:13 | permissible 134:8 | 402:4 471:16 | 413:1,19,21 440:2 |
| 66:20 72:8 86:3 | 368:12 372:6,9 | permission 162:22 | 488:18 489:4 | 499:10 513:19 |
| 89:9 96:6 102:4 | 376:13 381:4,5 | 476:4 | pesticide 269:21 | petitioned 30:5 |
| 107:12 128:8,11 | 388:1,3 409:11 | permitted 116:16 | 308:2 419:4 | 44:2 99:9,22 |
| 129:12,13 131:6 | 418:9,9 439:10 | perpetuated | 420:18 421:15 | 108:5 142:1,5 |
| 133:8 151:2,17 | 441:10 454:11,12 | 491:14 | 517:8 | 313:14 315:1,5 |
| 152:22 161:19 | 454:17 466:15 | Persephone 496:1 | pesticides 21:11 | petitioners 100:1,2 |
| 162:3,12 164:13 | 470:18 475:20 | persist 207:4 | 122:20 297:14 | 100:3 |
| 165:11 177:13 | 476:15 493:1 | 278:20 328:8 | 298:1 325:13 | petitions 20:7 21:1 |
| 179:9 180:6 | 494:10 | 416:21 | 513:8 | 28:15 45:3 81:7 |
| 199:20 249:6 | percentage 105:1 | persistence 208:4 | pests 221:22 304:2 | 87:20 94:2 99:15 |
| 252:13,15 253:10 | 184:6 307:6 | 278:17 325:17 | 426:13 | 106:1 290:21 |
| 253:16 258:16 | 309:15 376:15 | 328:17 330:3,5 | pet 108:2,5,7,9,10 | 304:8,16 |
| 265:8 267:9 268:5 | 390:12,20 418:2 | 331:4 | 108:12 109:19,19 | pets 139:13 143:2 |
| 268:13 272:14 | 423:19 447:5 | persistent 67:19 | 110:1,16 111:13 | 144:21 |
| 274:3,14,16 | perception 428:6 | 209:8 326:3 | 111:16 112:11 | Pew 45:21 |
| 323:22 344:7,14 | perceptions 393:16 | persistently 6:2 | 113:6,18,22 | pH 279:9 330:4 |
| 344:19 346:3 | perch 65:20 158:11 | persisting 330:9 | 114:21 115:3 | 496:11 |
| 357:19 375:5,7,7 | 159:14 | person 151:21 | 134:4,8 135:9,18 | pharmaceutical |
| 377:11 378:6 | percussive 58:21 | 161:17 316:5,20 | 138:8,22 141:16 | 310:22 409:1 |
| 379:5 389:17 | perennials 220:18 | personal 132:14 | 141:20 142:7 | pharmaceuticals |
| 402:14,20 406:16 | perfect 262:20 | 456:6 486:19 | 143:19 144:3 | 408:15 |
| 426:19 427:2,18 | 263:11 400:7 | 498:12 506:14 | 145:8,9,19 149:22 | phase 55:20 101:8 |
| 429:3 438:14 | perforations | personally 10:13 | 150:3 151:9,16,22 | 101:9 111:8 128:2 |
| 439:2,3,17 440:6 | 424:11 | 392:5 449:8 | 152:3 193:2 | 290:2 |
| 440:11,14 441:8 | perform 401:14 | personnel 10:20 | Peter 176:1 | phased 475:6 508:1 |
| 455:2 457:20 | performance | 12:3 130:5 | petition 18:22 | phaseout 300:18 |
| 459:22 460:15 | 322:21 | persons 18:22 22:1 | 21:15 22:2 28:4,9 | 367:9 381:9 |
| 462:20,22 465:12 | period 52:2 55:14 | 236:19 | 31:15,18 78:18 | 385:10 |
| 493:9 495:4 | 55:18 56:2 74:8 | perspective 92:21 | 88:7 96:19 100:13 | phase-out 366:5,9 |
| 498:11,22 499:7 | 76:17 110:9 | 93:20 94:14 103:9 | 101:2 108:3 109:6 | 489:21 508:15 |

| | | | | |
|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| phasing 480:19 | Pierce 60:1 | plans 223:5 224:6 299:18 400:15 | plays 433:5 499:13 | 245:18 263:21 |
| pheromone 468:15 469:1,5 471:2,14 474:7 | Piercy 5:5 | plant 6:4 44:3 62:12,14,15 87:20 88:5 89:3,6 91:10 95:18 96:13 100:8 147:10 197:8,10 197:11,12,14 204:8,11,16 205:20 207:7,16 208:17 209:5 211:14 223:11 282:11 289:14 313:20 314:20 315:5 328:3 333:1 335:22 348:19,21 348:22 349:1 362:10 370:17,19 387:19 410:17 417:4 470:4 515:14 | please 104:17 117:1 152:1 160:3 179:15 207:1 298:7,17 320:18 343:1 346:13,21 347:9 370:22 402:21 407:17 408:6 409:7 410:7 411:14 450:10 456:15 482:7 500:13 507:14 513:19 | 264:6,8 266:20 268:12 279:19 295:17 301:7 305:20 310:1 323:9 337:8 343:21 346:2 360:15 412:10 417:6,8 421:18 428:4 431:22 432:10 435:5 448:1 498:9 |
| pheromones 469:7 469:12 | pig 166:14 | planted 343:18 378:1,3 389:9 446:12 468:2 | pleased 32:18 | pointed 242:1 244:11,22 245:14 258:6 377:1 |
| philosophical 294:10 445:5 | pigment 62:8 | planting 6:18 223:11 353:1 377:10 | pleasure 231:5,7 412:3 | pointing 343:16 |
| philosophies 442:10 | pigmented 62:6 | plantings 225:10 362:11 | plots 352:15 | points 20:15 49:21 127:15 168:9 234:14 284:9 298:21 301:11 342:16 358:22 368:7 411:10,17 458:4 514:22 |
| phosphorus 176:16 | pigs 511:13 | plants 5:16 53:11 53:14,17 66:22 71:1 75:14 88:3,3 88:8,15,20 91:2 91:21 92:5 96:10 96:10 102:21 103:3,7,12 164:17 234:2 | PLU 485:1 | poison 307:5 |
| photos 98:9 | pile 159:18 | plastic 416:3 | plus 188:19 518:3 | polar 51:2 |
| phrase 15:17 39:18 | piles 400:13 | play 5:6 288:17 292:2 473:10 | pneumonia 505:2 | polarized 351:6,16 |
| physical 73:22 190:5 | pin 467:3 | playing 305:5 | Pobst 467:19 477:22 478:2,3 482:19 484:14 | pole 5:10 |
| physically 91:20 244:6 299:7,10 312:18 506:10 | pink 400:6,6 | | pockmarked 424:3 | policies 7:15 13:10 15:7 27:17 39:8 350:16 |
| physician 231:11 500:21 | pins 464:2 | | podium 316:15,21 317:2,6 365:10 392:16 398:4 404:21 406:22 412:3 424:21 441:15 453:1 459:7 467:19 477:22 485:19 490:12 495:16 507:10 510:21 | policy 3:8 4:11 6:22 7:3,8,19 8:3 10:7 10:18 14:10 15:8 16:19 17:10,12 19:4,5,18 20:16 28:13 29:1 30:1 31:22 39:9 40:20 169:20 177:7 302:8 350:14 351:13 352:6 370:15 |
| Physicians 230:8 | pioneer 400:9 477:14 | | Po 467:19 477:22 478:2,3 482:19 484:14 | political 291:21 293:10 413:11 457:5 |
| physiological 72:12 | pioneering 294:17 | | poem 5:4,4 | politician 495:20 |
| physiology 101:15 | pitfalls 472:5 | | point 9:5 18:8 32:6 41:6 56:19 57:5,8 69:3,4,6 83:1 92:22 95:2 97:3 100:21 123:9 126:19,20 130:4 154:2 170:15 173:5 196:11 209:13 215:19 233:4 235:10 236:18 237:15 241:3 243:1,2 | |
| phytotoxic 200:16 | place 24:3 33:18 36:13 56:18 58:16 82:13 107:10 121:6 158:10 169:6 201:1 221:17 226:9 232:20 287:9 299:18 341:16 357:3 363:20,21 396:1 | | | |
| phytotoxicity 322:14 | placed 11:18 | | | |
| Ph.D 45:18 120:19 197:9 204:10 347:2 370:16 507:18 | places 70:11 253:11 434:11 | | | |
| PI 230:21 | plan 14:18 20:2 43:22 66:6 73:9 73:15,16 84:20 85:7 107:11 126:15 131:13 219:1,3 222:2,6 222:22 223:1,14 223:15,19 224:3,6 224:16 225:14,19 226:15 242:19 284:2 304:7,16 315:18 432:20 445:14 447:11 449:20 487:12,13 | | | |
| pick 5:14 158:12 | planet 402:12 515:2 | | | |
| picked 465:1 | planning 88:2 223:13 225:5 | | | |
| pickers 266:14 | | | | |
| picking 465:5 | | | | |
| picture 44:5 51:1 51:19 52:10,12 59:17 60:22 63:9 64:7 77:5 94:1 163:16 235:17 | | | | |
| pictures 137:20 155:5 | | | | |
| picturing 163:18 | | | | |
| piece 69:18 82:5,6 83:2,3 423:17 | | | | |
| pieces 56:14 146:4 | | | | |
| PIER 297:12 | | | | |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| politics 295:6 | portion 177:6 180:20 | posting 16:4 25:9 25:22 | 248:20 | 467:6 |
| poll 379:1 | Portland 1:11,12 | postings 24:9 | pouring 129:7 | pragmatism 460:6 |
| polling 432:2 | 486:10 507:6 | postpone 47:19 193:2 | power 271:12 489:16 502:21 504:3 | pray 399:5 |
| polluting 165:5 | 523:5 | post-bloom 273:7 | powerful 354:5 | praying 5:15 |
| pollution 170:22 | posed 301:22 | post-blossom 294:2 | PowerPoint 45:6 79:3 | pre 341:11 |
| polyculture 66:14 | poses 297:18 | post-doctoral 370:17 | PPM 15:6,16 19:5 21:20 29:19 39:7 39:17 41:9 | precipice 174:4 |
| polyoxin 309:21 310:18 311:2,19 312:6 317:21 321:1 323:10 324:6,15 325:14 325:20 326:14 327:17,21 329:14 331:12,16 332:8,9 332:22 333:1,4,7 333:12,14,17,22 334:13 335:20 336:8,12 338:7,11 339:10,15 340:6 498:21 | position 28:7 168:14 221:6 281:13 290:15,19 295:17 296:3 298:2 301:12 302:16 305:17 312:16 339:13 358:10 364:15 385:2 431:16 435:1 437:7 486:21 520:17 | post-harvest 324:7 324:10 341:7,12 341:14,17 342:1 | practical 350:15 351:11 352:6 353:7 | precluded 61:7 |
| pond 63:21 73:11 98:11 338:13 | positions 302:20 | post-harvested 369:9 | practicality 350:18 443:12 | precluding 352:19 |
| ponds 74:9 75:14 90:18 | positive 16:17 132:20 247:15 263:1 369:13 413:5 418:7 497:2 | potatoes 319:16 425:14 429:3 512:7 | practice 77:10 117:20 138:6 182:4 220:10,14 222:15 224:20 225:7 271:8 351:14 360:19 449:8 488:18 489:3,12 | predacious 312:15 |
| pooled 390:17 | possibilities 437:19 | potential 58:3 73:1 205:10 236:13 241:1 242:9 257:19 261:12 273:13 283:8 319:10 322:13 324:7,12 325:4 327:13 361:4 367:13 369:15 393:11 444:14,17 472:5 | practices 81:22 185:19 220:15,19 220:21 221:11,16 221:18 223:1,3,8 223:16,22 225:4 225:20 226:4,6,16 228:7,14 267:8 290:6,10 303:6 304:20 305:12 306:9 353:6 354:10 355:22 356:4 360:17 364:17 372:13 376:5 382:20 383:10 386:5 394:7 396:4,17 401:16 442:9 463:1,1 486:12 488:7,20 490:6 494:2 496:9,18 497:2,4,13 500:3 509:17 | predators 73:9 75:10 312:15 |
| POP 485:6 | possibility 104:6 178:22 259:8 261:2 398:1 484:12 | potentially 104:1 202:7 240:21 242:11 245:21 256:2 259:3,21 319:17 327:22 360:3 369:3 416:21 458:10 | pragmatically | predatory 168:12 172:9 175:9,17 |
| Poposka 280:1,4 | possible 4:19 212:21 239:15 263:22 286:13 304:18 317:3 346:17 348:1 395:16 420:22 460:13 498:20 | poultry 30:10,22 67:11 72:14 95:22 122:22 125:1 128:13 130:1 178:11,18 179:1 181:8,11 188:6 | | predict 318:21 371:17 |
| Poposki 280:2 | possibly 255:7 396:11 423:19 | pound 175:19 182:21 190:21 | | predictable 83:10 |
| popular 374:5 462:12 | post 341:2 444:14 475:17 | pounds 60:16,17,19 154:3,3 175:20 | | predicted 445:12 |
| population 176:17 204:21 209:12 214:7 238:21 241:9 255:18 471:16 | postdoctorate 133:20 | | | predictive 479:16 |
| populations 170:20 174:3 214:21,22 232:3 236:13 238:11 239:16 241:2,10 242:17 245:3 257:20 258:2,7,14 259:15 259:17 261:6,11 277:2 279:8 373:15 | posted 16:1 19:21 26:9,17 40:2 110:7 127:10 283:1 284:18 288:3 311:14 314:10 | | | prefer 115:18 |
| Port 278:3 | | | | preferable 17:15 |
| portable 264:5 | | | | preferred 270:20 |
| | | | | pregnancy 263:19 |
| | | | | preliminary 202:18 |
| | | | | premature 456:18 478:16 |
| | | | | prematurely 458:7 481:4 |
| | | | | premise 309:18 |
| | | | | premium 146:1 |
| | | | | prepare 366:8 |
| | | | | prepared 105:22 106:5 195:8 341:9 |
| | | | | preparing 295:8 384:7 |
| | | | | prescription 266:18 |
| | | | | prescriptive 395:7 |
| | | | | preseason 248:10 |
| | | | | presence 233:5,6 233:12 240:15 255:22 263:1 502:9 |
| | | | | present 1:14 2:10 7:9 107:13 131:20 190:7 197:1 206:9 208:17 212:15 |

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 213:10,13 215:11 235:1 238:13 259:10 281:13,14 281:17 presentation 4:12 43:5 45:6 77:17 98:9,21 133:15 160:11 165:19 168:3 181:1 191:22 192:1 195:8 243:17 283:6 288:12 375:19 407:3 423:2 520:19 presentations 93:8 197:5 460:11 presented 38:1 92:13 118:7 152:7 249:7 287:20 288:19 298:20 430:10 492:8 presenter 27:4 31:12 presenters 68:17 186:10 195:15,16 195:19 343:5 presenting 13:1 95:1 187:11 242:6 523:2 presently 121:12 246:10 presents 438:19 president 216:20 331:9 335:15 387:2 presiding 1:12 pressing 501:6 pressure 233:1,6 319:3 359:22 362:15 408:22 468:22 471:5 pressures 429:9 pressuring 497:7 presumably 491:15 pretend 362:19 prettier 293:16 479:22 | pretty 33:18 91:9 91:12 107:1 198:4 200:13 203:8 208:16 248:1,16 249:7 250:9,22 268:4 275:16,20 318:20 343:19 372:20 375:3 400:20 401:7 403:17 414:7 500:7 512:9 514:5 515:11,19 prevailing 297:17 prevalence 503:19 prevalent 221:1 prevent 75:19 138:18 181:10 199:7 220:16 221:22 223:9 322:20 323:2 373:12 429:12 510:7 preventable 135:7 179:13 preventative 71:3 221:16,17 222:6 223:21 225:1,3,20 227:9,16 263:3 340:5 354:9 377:4 378:7 487:12 488:7 490:6 517:2 preventing 509:12 prevention 73:16 222:11 223:7 229:8 445:15 488:14,18 489:4 513:5 preventive 229:13 230:9 318:19 384:10 445:17 501:1 previous 43:15 282:16,19,20,21 313:16 314:5,9,18 376:5 487:1 previously 240:21 259:10 288:10 | 313:14 Previsto 271:20 273:12,16 303:18 415:3 509:8 pre-bloom 264:15 pre-harvest 409:22 410:1 417:19 price 458:13 516:12 pride 301:9 454:22 primarily 10:6 78:19 88:8 101:11 214:16 248:10 268:8 273:14 375:7 458:6 505:6 primary 203:19 272:21 273:1 335:16 354:9 465:16 principal 295:12 principally 69:19 principle 38:1 99:18 373:13 principled 350:15 352:6 principles 48:10 71:14 96:3 97:11 98:1 129:9 168:18 350:19 351:7 381:9 496:5 497:21 511:5,10 print 347:22 printed 347:21 371:12 prior 25:22 26:9 40:16 84:18 191:12 220:12 222:9 225:22 284:15 299:21 352:18 483:3 501:21 prioritization 28:12,21 30:2 prioritize 17:6 priority 21:1 28:16 30:4,14,16 priority-setting | 22:5 private 388:19 privilege 69:12 prize 192:8 504:8 proactive 28:6 373:10 378:7 probability 378:5 probable 460:14 probably 9:9,9 46:2 61:13 63:12 65:14 70:15 82:4 85:22 89:13 97:15 100:14 118:1 126:8 163:1,19 166:17 184:9 198:5 210:16 212:15 233:11 249:11,13 250:15 265:14 268:15 270:10 276:14 289:1,2 318:3 335:17 362:10 423:2 424:16 437:8 447:14 450:6 475:20 477:7 506:2 probing 422:4 probiotic 362:4 problem 19:16 49:16 124:3 138:14 147:21 171:11 173:21 200:14 201:4 206:11 212:16 232:4 239:21 244:21 263:14 265:6 266:7,8 268:5,17 274:14 276:14 294:6 318:22 319:4,7 320:3,9 398:22 401:1 406:19 426:16,17 427:7 429:7 462:20 468:17 501:8 502:15 problematic | 113:20,21 114:9 114:17 339:15 404:6 488:20 problems 144:11 149:4 203:11,12 203:13,14 221:10 231:13,17 240:2 260:3,19 272:22 404:4 461:8 472:10 496:13 497:12,16 501:6 problem-solving 128:18 procedural 436:21 procedure 7:20 40:20 procedures 7:16 18:21 19:4,10 27:22 28:13 223:2 302:8 304:22 proceed 32:4 36:15 37:12 process 8:19 14:2 14:10,20 20:21 21:15,17 22:5 28:4,9 31:15,18 41:8,13 45:3 78:16 79:14 81:1 83:22 102:17 111:4 113:16 127:8,17,20 131:8 132:3,18 169:2 173:1 180:1 217:4 220:4 222:17,19 249:20 251:9 254:7 257:15 272:1 286:19 295:3 315:20 316:13 335:3 421:13 463:3 489:6 490:3 492:17 503:6 508:15 processed 264:21 processes 202:11 265:21 processing 66:3 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|--------------------------|--------------------------|----------------------|---------------------------|----------------------------|
| 67:12 111:8 | 291:8 345:14 | 308:6 309:16,17 | 466:12 468:16 | 412:19 |
| 146:13 295:9 | 361:8 365:21 | 311:21 312:9 | 470:16 471:10 | progression 62:1 |
| 499:6 | 375:22 376:13,15 | 321:14 322:1 | 472:7 475:1 508:7 | progressive 70:16 |
| processor 46:6 | 387:2 455:6,9 | 324:3,4 332:10 | 509:13 520:1 | prohibit 104:2,8 |
| processors 219:22 | 456:15 482:6 | 334:1 350:15 | 521:17 | 116:17 138:7,21 |
| 365:21 486:5 | 487:9,11,16,19 | 351:9,17 359:15 | professional 271:7 | 522:5 |
| process-based | 488:1,9 490:20 | 360:13 361:11 | 347:3 | prohibited 66:17 |
| 489:14 | 512:19 | 366:6,16 368:11 | professor 178:13 | 66:19 67:1,11 |
| produce 171:6 | producer's 223:19 | 369:12 381:11 | 197:7 204:7 | 74:10 75:11,15 |
| 216:15 218:8,16 | produces 59:22 | 383:1 388:17 | 228:21 321:4 | 76:2 77:3 117:9 |
| 219:12 262:15 | 139:10 176:8 | 390:6 391:21 | professors 191:16 | 169:14 226:17 |
| 291:5 303:3 362:9 | 205:22 218:6 | 393:8,22 396:10 | program 1:2 2:13 | 374:3 |
| 379:17,21 380:4,7 | 369:18 | 397:2,11 399:9 | 2:17,19 10:14 | prohibition 301:17 |
| 380:8,17,18 | producing 82:14 | 403:6 420:19 | 12:3 13:19 14:1,7 | 375:11 |
| 382:10 386:20,21 | 206:9 227:3 | 422:14 426:21 | 14:12,14,17,19,22 | project 36:12 104:5 |
| 386:22 387:7,8,12 | 329:19 427:1 | 427:10,16 428:1 | 15:2,10 16:11 | 198:12,12,18 |
| 387:20 388:2,7,10 | 455:21 | 428:22 431:18 | 17:22 20:10 32:22 | 229:21 408:4 |
| 391:8 392:7 | product 55:4 | 438:9 453:8 455:7 | 34:8 35:11,22 | 414:6,8 472:12 |
| 425:21 426:22 | 119:20 120:4 | 455:17 456:2,21 | 36:3 43:6 44:10 | 475:9 |
| 453:17 454:2,9,13 | 139:11 140:1 | 458:9,11 469:3,7 | 45:12 46:1 48:17 | projects 469:11 |
| 493:8 496:10 | 143:15 144:6 | 478:19 481:20 | 78:6,12,13 88:19 | 470:5,7 |
| 499:8 516:9 | 145:14 146:17 | 483:8 486:15 | 108:11,12 115:6 | prolong 502:12 |
| produced 48:19 | 206:5 207:9 | 488:8 492:11 | 118:17 126:19 | 504:4 |
| 75:3 108:16 115:8 | 242:12 247:20 | 499:20 511:6 | 129:13 154:16 | promiscuous |
| 116:22 119:13 | 251:19 252:5 | 512:15 513:11 | 156:8 196:14 | 232:19 503:3 |
| 171:4 176:15 | 269:13 272:12 | 514:6,7 517:5 | 216:1,3,8,18 | promising 250:4 |
| 219:10 305:14 | 273:12 303:18 | products 21:9 | 217:14,21 227:5 | 294:14 381:16 |
| 345:20 359:14 | 318:10 322:1 | 67:11 103:16 | 230:1 243:2 276:1 | 401:7 |
| 505:15 | 323:16,17 326:9 | 112:20 140:9 | 276:21 285:8 | promote 366:21 |
| producer 119:17 | 327:12 391:19 | 146:14 166:3 | 289:1 294:14 | promoter 72:10,18 |
| 145:20 186:14 | 402:7 406:10 | 199:4,10,11 201:3 | 310:19 321:12 | promotes 499:21 |
| 218:7,9,15 225:11 | 415:4 419:6,18,22 | 205:21 206:14,15 | 326:22 364:2 | 503:9 |
| 262:19 295:13 | 450:7 463:14 | 206:17,18,18 | 365:15 368:2,15 | promoting 171:9 |
| 428:18 456:7 | 465:10 471:8,11 | 218:2 247:9 | 400:8 433:3 437:9 | 327:16 |
| 486:19 490:16 | 510:14 514:8 | 283:20 294:14 | 439:15 447:18 | promotion 206:12 |
| 516:8 | production 44:3 | 304:1,5 321:16,17 | 469:1,5 474:20 | 493:22 |
| producers 26:15 | 47:8 51:6 58:13 | 321:17,20,22 | 477:4,7 483:12 | promptly 107:3 |
| 50:20 116:9,13 | 85:9 86:6 111:9 | 322:4,5,11,14,18 | 486:4,7 488:14 | 194:16 523:19 |
| 117:14 120:12 | 128:14 154:11,21 | 322:22 323:5,7,9 | 520:3 521:9,12 | pronounced 321:2 |
| 124:12 125:10 | 158:7,17 168:15 | 323:10 328:2 | programs 50:9 | pronouncing 321:3 |
| 129:4 154:19 | 185:12 188:17 | 330:21 339:1,19 | 216:21 299:7,8 | 459:10 |
| 178:19 182:3 | 196:20 225:8,18 | 339:20 340:4 | 321:9 397:2 474:4 | propagation |
| 186:15 187:1,3 | 248:9 260:7,9,14 | 351:13 359:13 | 507:18 517:2 | 313:20 314:20 |
| 189:15 216:19 | 260:17 277:15 | 388:22 401:12 | program's 89:8 | 315:6 |
| 218:20,20 219:7 | 289:14 291:17 | 420:8,16 444:7,13 | 285:20 | proper 288:15 |
| 219:15,16,21 | 295:8,12 296:15 | 453:22 461:6 | progress 32:18 | 456:12 |
| 220:15 224:22 | 298:17 307:7,20 | 463:8,10,11,17 | 33:17 35:19 | properly 5:11 |

| | | | | |
|---------------------------|---------------------------|---------------------------|---------------------------|---------------------------|
| prophylactic 297:4 | protect 35:17 | 217:2 223:7 227:6 | 192:10,19 218:18 | pursue 32:9 |
| proposal 13:5 | 180:12 199:6,15 | 233:7 263:3 | 229:3,17 230:2 | Pusey 211:9 |
| 17:17 18:2,4 21:6 | 201:16,19 217:21 | 292:17 299:16 | 281:2,9 283:2,14 | push 362:2 417:20 |
| 23:13,20 45:7 | 246:9 247:12 | 305:6 339:16 | 283:15 284:9,18 | pushed 271:22 |
| 47:16 89:8 90:9 | 249:9 251:16 | 352:1,5 387:11 | 288:20 290:13 | 303:20 400:10 |
| 107:22 115:19 | 271:18 273:3 | 401:5 412:14 | 297:9 298:4 | pushing 410:2 |
| 121:22 122:5 | 275:1,13 276:2 | 443:9 456:11 | 301:21 311:15 | put 18:11 29:8,19 |
| 123:21 152:6 | 277:8,13 278:8 | 462:22 488:21 | 314:12 315:21 | 34:11 41:11 52:13 |
| 192:16 272:3 | 294:4 298:4 303:8 | 494:12 495:6 | 316:2,7 317:9 | 56:7 82:4 91:1,2 |
| 281:17 286:14 | 346:8 382:5 383:2 | provided 9:3 12:16 | 340:11 368:9 | 94:7 114:15 119:2 |
| 287:21 289:3 | 394:4 403:17 | 63:11 222:1 | 389:15,22 427:17 | 119:10 128:3 |
| 291:3 292:7 | 404:13 406:15 | 311:10 340:22 | 434:7 457:7 | 131:2 136:14 |
| 295:18 296:2,6 | 444:11 449:1,15 | 373:3 436:13 | 486:17 487:1 | 148:20,21 153:2,4 |
| 350:8 355:10,11 | 450:1 469:19 | provides 117:14 | 492:18 501:2,6 | 157:9 177:17 |
| 363:5 364:13,14 | 470:10 472:4,21 | 333:17 339:11 | 503:18 509:21 | 185:9 221:5 |
| 366:1 382:14,17 | 479:14 509:7 | 353:9 | publication 371:16 | 222:15 247:22 |
| 383:13 385:14 | protectant 333:1 | providing 14:2 | publications | 248:16,20 270:1 |
| 442:16 451:3 | 449:7 | 16:10 90:14 356:9 | 371:12 377:16 | 276:22 277:7 |
| 491:5 | protected 208:22 | 443:3 453:20 | 522:3 | 278:7 304:18 |
| proposals 20:11,19 | protecting 270:3 | 491:5 | publicly 386:14 | 318:22 336:4 |
| 25:1 32:14 33:13 | protection 13:16 | Provisions 301:15 | public's 428:6 | 351:18 357:6,20 |
| 124:2 192:14 | 269:22 337:10 | proviso 180:2 | publish 275:18 | 364:14 384:14 |
| 280:22 283:1 | 479:18 | pruning 220:21 | 414:14,18,19 | 386:7 416:2 423:5 |
| propose 91:7 352:4 | protective 180:20 | 445:16 449:9 | published 47:1 | 427:5 439:2,7 |
| 380:17 445:8 | protein 47:6 82:14 | public 3:11,17,22 | 94:10 230:16 | 443:7 445:3 |
| proposed 7:15 | 82:18 95:18 | 8:12,21 9:3 13:2,4 | 371:11 408:13 | 455:10 457:6 |
| 16:18 17:10 24:13 | 136:22,22 139:11 | 14:3,5,14 15:5,8 | 522:3 | 458:3 472:16 |
| 25:12 43:6 44:8 | 139:11,15,15,20 | 15:11,12,21,22 | publishing 188:6 | 473:1 475:12 |
| 48:14 49:22 51:21 | 140:8,11,14 | 16:3,6,10,13,18 | pull 239:19 | 477:8,19 481:9 |
| 52:15 56:13,22 | 157:14 175:19 | 17:11,14,17 18:12 | pulled 420:10,17 | 484:16,17 518:17 |
| 65:22 66:5,8 68:5 | 189:19 193:11 | 20:8 21:14 22:10 | pulling 65:12 | 518:18 |
| 70:12 78:13 82:21 | proteins 95:19 | 22:12 24:2,12,20 | pulse 24:15 | putative 205:11 |
| 148:12,17 287:11 | protest 169:5 | 25:2,5,14 26:4,5 | pupae 337:20 | puts 36:20 59:22 |
| 290:4 291:4 | protocol 307:13,17 | 26:11 27:20 28:1 | purchase 345:17 | 365:2 382:18 |
| 295:17 305:3 | 404:8 421:4,14 | 28:4,9,10 31:18 | 363:8 425:17 | putting 34:7 115:7 |
| 352:12 354:21 | 423:9 | 32:15,19,21 33:1 | 455:5 499:7 | 156:9 180:12 |
| 356:16 417:14 | protocols 119:2 | 36:2,12 37:11 | purchased 381:3 | 276:16,17 299:11 |
| 435:1 | 267:18 402:2 | 39:6,9,11,13,21 | purchases 381:4,5 | 319:8 404:1 |
| proposes 15:6 39:7 | prove 74:14 435:6 | 40:1,4 42:22 | purchasing 391:8 | 416:12 450:19 |
| proposing 19:12 | proven 292:15 | 43:21 73:17 76:3 | Purdue 46:9 | 461:3 |
| 88:19 | 469:4 478:22 | 107:13 110:9 | purify 206:2 | puzzle 146:5 |
| proscribe 61:3 | provide 5:12 7:14 | 111:14 112:13 | purity 26:8 479:7 | PyGanic 517:6,7 |
| proscribed 77:12 | 10:6 13:8 16:13 | 113:17 114:20 | purpose 10:5,11 | Pyrenees 141:2 |
| 77:14 | 17:4 72:22 76:18 | 115:1,20 119:3 | 20:14 26:13 | pyrifera 62:16 |
| proscribing 77:11 | 79:4 106:6 116:21 | 122:14 128:3 | 314:19 315:5 | p.m 194:20 195:2 |
| prospectively | 128:8 130:10 | 130:18 133:9,12 | purposes 19:1 | 342:11,12 523:22 |
| 340:4 | 137:18 145:6 | 133:14 186:20 | 421:19,20 430:1 | |

| | | | | |
|--------------------------|--------------------------|---------------------------|---------------------------|----------------------------|
| Q | | | | |
| quadrillion 262:9 | 27:4 31:12 57:3 | 516:19 | 241:12 | 238:14 259:17 |
| Quagraine 46:8 | 68:7 77:18 79:2,8 | quote 172:11 | rapidly 59:15 | 503:15 |
| qualify 65:15 | 84:10 115:14 | 408:20 499:20 | 68:21 69:10,10,11 | reading 24:17 |
| 105:10 452:11 | 139:3 146:7 152:5 | quote-unquote | 93:15 97:16 208:8 | 34:18 |
| quality 64:9 70:9 | 156:22 159:5 | 262:20 | 209:15 231:18 | reads 15:5 19:7 |
| 76:12 139:11 | 165:17 172:19 | | 238:15 286:13 | 282:12 289:22 |
| 327:2,8 388:10 | 181:1,4 184:4 | R | 338:8 | ready 251:22 |
| 496:10 520:4 | 191:6 195:14 | R 4:1 119:20 | rare 205:3 210:8 | 272:14 274:7,10 |
| quandary 345:15 | 204:4 206:21 | rabbit 6:11 | 226:3 241:7,13 | 274:17 276:11 |
| quantification | 210:21 243:3,6,7 | raceways 59:16 | 242:15 259:13 | 294:15 310:12 |
| 409:18 | 249:15 262:17 | radiation 208:7 | 261:7,10 | 384:21 |
| quantities 445:19 | 274:18 281:7 | radical 84:22 | rarely 138:10 | real 5:10 6:6,7,7 |
| 504:17 | 309:12 313:2 | radio 483:12 | 350:22 | 105:8 117:14 |
| quantity 402:8 | 316:4,5 320:18 | radius 234:12 | rate 157:18 190:15 | 149:5 163:2 |
| quarter 476:9 | 324:19 338:18 | rafts 53:10,22 | 410:3,4 416:9 | 166:21 238:9 |
| question 81:4 | 342:18 395:20 | rain 209:1 403:22 | 417:12,14 421:21 | 274:2 275:22 |
| 92:17 93:10 94:4 | 403:1 412:1 | rainfall 208:9 | rates 54:17 213:1 | 299:11 360:13 |
| 94:5 98:7 101:5,8 | 421:10 427:13 | 470:18 | 325:14 338:10 | 363:4 395:10 |
| 104:21 105:7 | 446:10 457:11 | raining 476:6 | 410:3 416:8,11,12 | 398:1 411:9 |
| 121:17 122:10 | 467:13 472:1 | rainstorm 208:15 | 418:1,6 471:9 | 444:17 456:16 |
| 160:3 166:21 | 482:10 483:9 | raise 92:16 179:10 | 472:13 475:2 | 462:9 466:21 |
| 181:6 191:9 193:8 | 490:10 495:14 | 346:16 496:1 | rating 269:18 | 477:11 509:6 |
| 193:21 223:20 | 500:9 507:5 | raised 54:9 170:14 | ratio 175:19 | realistic 188:17 |
| 245:7,17 246:16 | 510:20 514:18 | 188:20 338:5 | ration 154:4 | 292:22 394:21 |
| 253:21 256:10,11 | 522:10 523:1,2 | 341:1 | rational 402:13 | 402:21 |
| 257:13 258:4 | question's 243:15 | raising 99:16 | 439:5 | realities 368:6 |
| 260:5 263:6 266:1 | 265:12 | Ralph 45:18 | rationale 312:10 | 481:14 493:6 |
| 267:21 269:17 | quick 105:17 | ramifications | rations 112:17 | reality 58:18 |
| 275:7,9 278:16,16 | 166:21 338:19 | 458:17 | ratios 184:13 | 163:19 368:8 |
| 301:22 316:6,10 | 439:21 | ran 522:20 | raw 114:13,13,16 | 393:13 464:15 |
| 324:21 329:6 | quickly 45:14 | Ranch 400:9 | 144:19 | 484:1 |
| 334:16 335:18 | 126:17 208:10 | 486:11 | reach 6:14 263:10 | realize 262:11 |
| 338:19 342:17 | 210:17 251:2 | Ranchers 186:13 | reached 137:5 | 348:13 |
| 355:8 363:15 | 274:8 276:10 | random 122:10 | 343:18 | realizing 516:6 |
| 370:5 374:12 | 317:3 353:8 430:6 | randomly 122:8 | reaching 6:14 | really 8:19,20 23:8 |
| 390:8 394:18 | 433:11,12,21 | Rangan 500:18 | react 128:4,7 | 32:17 34:1 50:1 |
| 396:14 403:3,8 | 442:14 466:22 | range 84:12 131:3 | 130:19 | 56:18 58:12 69:6 |
| 412:22 423:13 | 477:11 479:5 | 143:17 325:20,21 | reactive 373:16 | 69:17 70:10 71:20 |
| 424:9 428:15 | quietly 6:1 | 339:2 416:8 | read 25:17 162:4 | 74:22 84:8 94:1 |
| 437:9 439:21 | quit 196:5 476:6 | 440:20 441:9 | 166:7,10 254:15 | 97:20 102:3 |
| 440:1 452:1 466:8 | quite 11:13 35:14 | 442:9 | 255:8 281:22 | 104:21 117:21 |
| 474:18 506:5 | 40:18 77:7 129:8 | ranged 189:17 | 287:14 288:3 | 118:3 121:2,4 |
| 511:19 522:12 | 167:20 199:20 | ranging 299:14 | 291:13,14 344:15 | 123:2 126:8 |
| questioning 197:4 | 252:16 274:13 | 423:11 478:12 | 384:3 442:18 | 130:10 142:3,20 |
| 420:4 427:19 | 313:1 343:5 399:1 | rank 454:9 | 465:18 504:11 | 142:21 143:5 |
| questions 26:3,10 | 406:19 416:17 | ranking 271:10 | readily 110:20 | 144:11,22 145:19 |
| | 457:20 511:19 | rapid 231:14 | 232:17 236:19 | 149:9 154:16 |

| | | | | |
|---------------------------|----------------------------|---------------------------|---------------------------|---------------------------|
| 155:6 158:16 | 164:2,3 367:7,14 | recombinants | records 226:19 | 391:10 440:1 |
| 161:22 162:10,17 | 446:9 468:10 | 119:21 | 227:13 | 442:10 482:22 |
| 162:22 165:9 | reasonably 202:20 | recommend 97:13 | recourse 412:22 | regardless 228:12 |
| 166:14 176:9 | reasons 10:18 52:6 | 179:14 180:5 | recuse 286:4,7 | 393:15 429:11 |
| 183:18 185:4 | 93:4 95:16 96:18 | 208:19 353:13 | recusing 315:7 | regards 168:15,19 |
| 188:11 191:11 | 450:14 452:15 | 354:14 439:16 | recycled 53:16 | 169:22 225:2 |
| 192:15 193:15,20 | 483:17 | recommendation | recycling 66:13 | regime 362:2 |
| 193:22 197:19 | reassure 354:16 | 8:8 15:4 17:16 | 73:15 74:6 | regimen 401:17 |
| 210:9 215:17 | 386:7 | 18:5 19:8,20 37:1 | red 22:20 62:5 | region 367:18 |
| 217:1 232:11 | reassuring 84:8 | 37:17,21 39:5,6 | 141:9 316:17 | 398:21 410:11 |
| 233:18 237:16,19 | Rebecca 45:19 | 44:8,9 78:12 | reduce 14:10 393:7 | 448:21 |
| 242:20,21 243:22 | rebuild 382:10 | 142:16 154:6,9 | 475:12 481:19,22 | regions 67:18 |
| 244:1 245:1,2 | recall 100:1 313:13 | 157:7 158:18 | reduced 67:17 | 361:5 362:16 |
| 248:6 249:5 250:3 | receipt 224:15 | 160:1,6,8,18,22 | 71:12 73:4 492:21 | 491:2 |
| 250:19 252:17 | receive 13:17 21:1 | 169:12,13 172:5 | 496:11 | registered 199:15 |
| 253:19 255:15 | 114:20 286:1,14 | 172:10 185:14 | reduces 135:21 | 250:17 251:10 |
| 256:7 257:5 260:2 | 482:19 488:4 | 192:19 313:16 | reduction 174:10 | 272:13 303:19 |
| 263:10 267:13 | received 8:17 16:1 | 376:18 430:15 | 369:15 | 333:19,20 339:19 |
| 268:1,10 271:17 | 16:6,17 21:2,3 | 437:1 447:16 | redundant 304:21 | 339:20,22 340:5,6 |
| 274:14 275:21 | 40:2 119:8 139:6 | 448:13 486:22 | 322:8 395:7 489:2 | 341:13,19 347:8 |
| 277:11 306:2,6 | 229:1 282:3 | 487:6 | 489:18 | 415:9 509:8 522:1 |
| 307:8 319:1,20 | 287:17 289:3 | recommendations | reemphasize | registers 308:1 |
| 334:9 340:13 | 290:14 299:14 | 19:14 49:7 57:1 | 356:22 | registrant 419:4 |
| 346:11 361:1 | 310:18 311:18,18 | 102:11,13,19 | reexamine 413:20 | registration 202:5 |
| 385:6 397:5,13 | 313:11 334:5 | 106:3 123:14 | reference 103:18 | 202:11 249:20 |
| 403:7 404:1,3 | 356:12 372:5 | 125:6 134:13 | 116:20 176:7,21 | 252:3,18 254:15 |
| 407:22 411:12 | 374:22 470:18 | 136:3,4 185:9 | 348:10 444:2 | 272:1 323:14 |
| 414:8 423:7 | 504:8 | 332:1 | referenced 307:15 | 324:15 326:13 |
| 424:14 427:6 | receiving 19:20 | recommended 49:2 | 521:8 | 486:4 521:17 |
| 429:9 434:9 458:3 | 183:7 | 68:2 117:3,12 | references 225:14 | 522:2 |
| 460:8 461:16 | reception 523:14 | 412:7 | referencing 79:6 | registrations |
| 464:6,6 466:15 | recess 523:18 | recommending | referral 506:7 | 323:12 |
| 475:7 477:14 | recipient 212:17 | 30:2 47:2 49:3 | referred 114:12 | regs 148:17 |
| 483:20 484:4 | recirculating 65:18 | recommends 14:21 | 314:4 | regular 20:6 24:7 |
| 493:7 494:18 | reclassification | 292:11 | referring 330:13 | 34:16 161:17 |
| 520:10 521:8 | 172:12 | reconciling 257:14 | 419:11 436:6,13 | 165:10 240:7 |
| 522:20 | reclassified 172:10 | reconsider 95:5 | refiled 412:17 | 493:18 |
| reason 27:21 52:13 | recognition 230:10 | 152:2 | reflect 148:9 | regularly 433:1 |
| 57:22 68:6 144:22 | recognize 51:11 | reconsideration | reflects 226:16 | 484:22 |
| 148:3,14 166:1 | 124:12 134:10 | 29:2 41:17 94:21 | refugee 141:13 | regulated 111:16 |
| 178:9,20 201:5 | 141:1 234:1 296:7 | record 12:8 70:9 | regain 43:18 | 111:20 483:18 |
| 203:21 207:16 | 352:21 | 107:6 168:8 | regard 168:20 | regulation 112:2 |
| 275:12 339:5 | recognized 97:19 | 170:10 194:19 | 199:9 338:15 | 222:12 224:14,19 |
| 354:13 413:1,9 | 323:22 355:16 | 223:4 301:21 | 482:18 496:18 | 353:18,21 354:3 |
| 419:20 492:22 | recognizes 13:7 | 304:15 342:11 | regarded 326:5 | 402:4 |
| 495:11 | 292:1 358:10 | 344:16 475:3 | regarding 22:2 | regulations 103:2 |
| reasonable 28:5 | recognizing 386:10 | 492:19 523:22 | 332:3 333:6 | 103:19 104:7 |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 116:17,21 117:7 156:14 229:21 296:12 354:13 368:2 487:10 regulator 216:16 216:16 regulators 135:11 402:18 regulatory 19:19 112:7 162:17 295:5 332:11,12 332:14,15 Reid 46:7 reinforce 239:12 reiterate 40:16 175:7 285:19 293:3 395:4 430:11 reiterated 113:18 reiteration 357:3 Reitman-White 370:13 379:12,14 379:15 384:18 385:5 386:2 reject 370:22 513:19 related 13:10 93:11 309:9 412:18 relative 250:2 268:21 330:2 466:1,4,5,18 relatively 85:2,4 137:1 270:15 296:10 317:22 447:4 467:9 502:4 release 279:1,6 reliably 430:20 reliance 361:21 relied 29:15 360:17 relieve 521:20 relieved 151:10 relist 286:18 relisted 292:14 rely 227:15 307:2 390:1 444:20 455:6 487:10,11 relying 177:8 376:7 | 421:19 493:11 496:16 498:3 remain 85:1,4 96:19 99:20 remains 240:3 409:1 475:17 remarks 35:22 104:22 176:18 272:20 remedy 456:12 remember 87:7 129:21 253:5 255:4 256:21,21 409:20 424:14 498:10 remind 78:4 195:12 316:1 523:10 reminded 433:1,3 reminder 116:12 196:1 remote 261:2 removal 287:18 296:14 384:7 remove 28:15 67:21 286:15 289:10 303:1 removed 103:21 286:21 301:3 352:17 394:17 removing 394:8 450:18 rendered 76:20 renewal 224:11,15 rep 398:18 repeat 160:2 replace 95:18 327:3 468:10 replaced 11:12 445:10 447:21 448:3 469:2 replacement 31:2 188:22 189:1 replacements 301:4 366:13 397:8 replacing 101:11 | 272:4 443:12 468:13 replicable 508:17 replies 374:22 reply 331:19,22 report 48:19 67:16 107:22 110:5,5,7 116:2,2,6 119:3 126:14 127:13 130:16 131:18,19 139:18 141:21 142:14 143:9 144:14,20 191:13 227:11 254:15 255:9 275:18 282:17,18,19,20 311:9,10,12 314:3 314:4,6,8 324:21 325:3 331:20 334:11 338:2 415:15 422:6 461:13 469:11 470:4,7 500:18 reported 170:11 218:18 375:2 reports 139:1 218:16 282:22 332:2 501:9 reposted 26:10 reposting 26:13 represent 187:3 284:12 285:21 302:3 322:6 343:10 365:13 407:10,13 440:3 454:11 478:12 490:20 491:2 representative 365:17 410:5 451:22 represented 78:5 288:20 433:14 representing 78:10 293:4 379:20 386:20 480:6 486:16 represents 50:4 | 323:11 365:19 380:2 415:19 reproductive 67:17 135:3 request 19:13,15 19:21 110:4 191:9 314:2 333:21 347:4 requested 311:8 407:7 requests 19:5 20:8 109:21 282:8 311:1 313:18 369:5 require 58:11 62:8 66:9,12 67:2,2 73:8 74:5,8 75:1,2 75:7,12 175:17 193:13 220:14 222:8,8,21 223:6 223:18 224:4 227:12 333:10 377:3 509:12 512:19 required 31:5,7 51:15 57:14 59:6 62:7 74:19,21 75:19,21 87:1 116:15 225:20 226:5 301:2 489:4 requirement 58:15 79:12,18 82:7,8 98:18 137:2 140:15 157:7 158:20 227:3 requirements 70:2 70:5,8 75:4 96:17 99:8 134:14 135:10 136:13 140:12 185:15 220:11,12 222:22 225:12 488:17 489:12 requires 85:7 332:21 354:9 research 25:17 111:19 134:3 | 136:3 156:13,17 164:8 197:13 198:12 204:6,15 204:19 256:17 263:6 264:13 268:17 270:21 271:16 274:22 277:4 287:3 290:9 291:18 292:22 294:14 296:10,17 299:2 305:4 319:19 325:9 329:22 341:21 352:15 359:10 363:19 364:2 366:10,12 367:10 367:11,16 369:12 370:17 371:6,10 371:13,21 372:21 373:20 381:17 384:20 388:22 389:2,5 394:14,22 397:7 401:6 407:17 408:14 412:10,13,19 413:6 414:6 415:2 415:4,6,15,16 444:9 448:9 449:2 450:3 456:22 465:17 469:9,11 470:4,7 471:3,9 474:4 475:3,8 481:3 498:6 501:15,17 510:1 518:16 researcher 216:15 researchers 247:2 294:18 353:5 367:1,4 389:5 402:18 482:8 490:22 522:4 research-based 291:20 293:9 457:4 research-wise 94:6 reserve 435:14 reservoir 297:6 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------|---------------------------|---------------------------|---------------------------|--------------------------|
| 434:6,15 | 359:22 360:5 | 41:20 71:4 230:1 | 194:20 342:12 | 324:5 |
| reservoirs 338:13 | 393:21 408:8 | 314:5 | retail 216:15 | revolutionized |
| reset 465:8 | 434:5,6,16 468:18 | responses 122:17 | 387:12 388:6,15 | 58:12 |
| residency 229:4 | 498:17 501:7,14 | responsibilities | 392:6 484:22 | revolved 78:18 |
| residents 344:12 | 502:16,19 503:15 | 24:17 | 485:10,14 | revote 29:20 |
| residual 408:21 | 503:16 504:7 | responsibility | retailers 365:22 | rhizopus 329:17 |
| residuals 421:21 | 506:8,19 | 13:14 70:7 100:10 | 458:1 482:21 | rhymes 495:19 |
| residue 254:2,11,20 | resistant 209:12 | 302:1 432:11 | retain 409:4 451:4 | ribeyes 145:22 |
| 369:9 409:15 | 221:1 223:10 | 505:10 519:21 | retained 188:4 | Rice 229:2 |
| 410:9 415:17 | 231:15 232:2 | responsible 182:16 | 292:14 | Richard 167:11 |
| 416:20 417:5 | 234:20 235:7,12 | 230:3 505:6 | rethink 177:21 | 178:2,5 320:20 |
| 418:2,9 419:7,18 | 236:5 239:7,9,10 | responsive 71:4 | rethinking 177:11 | 331:7,9 386:16,18 |
| 420:7 423:19 | 241:17 259:1 | rest 167:22 366:4 | return 225:19 | 386:18 392:15,19 |
| 433:22 465:17 | 297:6 353:2 | 427:9 444:8 451:2 | 258:8 | 398:3 |
| 486:6 513:15,16 | 372:13,14 377:11 | 495:6 | returned 295:7 | Richardson 1:21 |
| residues 23:10 | 377:12 384:9 | restaurants 380:5 | returns 196:12 | 38:16 42:5 81:3 |
| 213:12 254:9 | 426:5,6 443:21 | restock 60:19 | 478:11 | 84:7 101:7 116:4 |
| 257:1 307:14 | 498:4 502:6 | restore 500:3 | Reuben 9:7 | 170:14 181:5,18 |
| 347:5 348:13,16 | 503:10,22 504:18 | restoring 385:11 | reversal 169:16 | 246:7 252:20 |
| 348:19 349:7,12 | 505:5 507:1 | restrict 183:20 | review 9:2 13:17 | 324:20 325:2,8 |
| 349:15,16,18,20 | resistance 232:13 | restricted 155:11 | 14:10 18:17 20:7 | 348:4,21 349:3 |
| 409:9,18 410:12 | 232:13 493:16 | 203:8 388:16 | 20:17,20,22 21:18 | 422:11 |
| 410:22 411:9 | resistances 506:11 | 390:5 391:19 | 28:1,7,19 29:3 | Rick 507:13,13,14 |
| 419:21 421:8 | resolution 287:14 | 492:13 | 31:8 68:12 110:2 | 507:14 510:21 |
| 423:7 | 289:22,22 292:1 | restrictions 75:11 | 116:7 117:5 139:5 | 511:1 514:12 |
| resist 233:8 502:21 | 295:22 304:10,11 | 219:12 300:1 | 187:19 222:16 | rid 449:11 |
| 505:1 | 305:2 357:7,11 | 304:19 488:2 | 224:12,17,19 | rifle 348:2 |
| resistance 204:17 | 364:21 490:4 | 489:10 | 278:17 282:15 | rig 476:3 |
| 205:7 206:11 | resort 354:19 | restrictive 445:22 | 301:14 307:16 | right 6:22 7:12 |
| 207:5 210:10 | 388:18 391:18 | 446:3 447:21 | 311:7 314:1 326:5 | 27:6 35:10 41:8 |
| 212:5,12 214:7,13 | 393:4 517:6 | 448:4 | 329:1 353:10 | 43:2 50:2,6 51:3 |
| 215:7,13 221:3 | resources 36:9 | result 16:4 277:5 | 371:20 418:19 | 56:5 59:11 61:2 |
| 231:19 232:2,11 | 179:15 218:14 | 279:5 308:17 | 447:15 492:17 | 75:21 89:17 90:8 |
| 232:15 233:15,19 | 489:9 | 309:3 351:11 | reviewed 20:5 | 95:19 100:15 |
| 235:1,3,5,9,13,16 | respect 479:6 | 353:6 382:3 457:9 | 117:2 282:16 | 102:1 106:17 |
| 236:2,6,9,10,12 | respectful 316:18 | resulted 496:9 | 301:2 317:15 | 107:1 108:4 109:9 |
| 236:15 237:13,17 | respond 95:8 | resulting 183:2,22 | 418:19 | 135:8 138:13 |
| 237:21 238:10,20 | 111:18 306:20 | 206:8 | reviewers 225:13 | 140:19 141:10 |
| 239:13,18,20 | 441:12 447:6 | results 151:17 | reviewing 41:8 | 143:10 145:3,3,11 |
| 240:12,15,18,20 | responded 372:7 | 275:19 351:7 | 318:11 | 147:19 148:1,3,10 |
| 240:22 241:15 | 375:5,7 379:5 | 360:5 364:5 | reviews 226:20 | 148:20,21 153:7 |
| 242:7,8 255:18,21 | 440:12 | 381:17 404:18 | revised 37:18,22 | 154:22 156:21 |
| 259:7 261:4 | respondents | 409:17 414:20 | 331:16 355:18 | 163:2,8,15 174:5 |
| 271:14 294:5 | 361:13 | 471:4 498:6 | revising 41:9 | 176:13 178:2 |
| 297:15 308:16,18 | responding 523:2 | 508:16,22 509:10 | revisiting 177:6 | 182:11 186:8 |
| 309:3,10 327:11 | response 27:5 | 510:1 | revolution 99:11 | 189:15 196:7 |
| 327:14 339:8,9 | 36:16 37:3 38:9 | resumed 107:7 | revolutionary | 199:22 201:4 |

| | | | | |
|---------------------------|----------------------------|----------------------------|--------------------------|---------------------------|
| 204:2 214:11 | rivers 338:13 | row 225:9 | safer 200:10 | 266:8 267:17,18 |
| 228:1 232:3 | Riverside 321:5 | ruin 328:18 | 201:21 202:1 | 486:6 |
| 251:12 254:14 | roach 334:15 | rule 30:9,20 43:6 | safety 114:17 | San 468:1 |
| 263:14 264:19 | road 263:21 264:4 | 44:7 78:13 89:8 | 167:16 229:19 | sand 97:3 |
| 281:14 286:11 | 265:15 309:5 | 94:19 104:1,8 | 230:11,14,22 | sanitary 75:2 |
| 289:7 303:5 | 449:3 | 108:18 116:15 | 231:2 323:4 332:3 | sanitation 199:1 |
| 304:12 310:14 | Rob 63:9 | 121:6 140:7 302:6 | 332:6 333:6,8 | 220:20 223:12 |
| 335:10 346:21 | robbing 176:1 | 320:15 392:3 | 430:10 500:20 | 264:15 372:16 |
| 355:1 370:11 | Robert 46:5 | 445:8,10,22 446:3 | sake 291:12 370:7 | 445:16 449:9 |
| 378:10 396:21 | Roberts 29:4 | 447:20,21 448:4 | 375:20 | 463:1 |
| 401:9 403:11,14 | robust 227:5 | rulemaking 45:9 | Sal 453:2 459:6,9 | Santa 398:11 403:6 |
| 403:16 405:14 | Rocky 442:3 | 49:11 68:14 | saleable 443:10 | Sarah 495:19 |
| 406:19 408:17 | Rodale 368:13 | 102:14,16 103:5 | sales 293:11,13 | Satisfying 302:4 |
| 418:14 422:8,16 | Rodenticide 308:8 | rules 29:4 302:2 | 351:17 380:1,3 | save 399:12 446:8 |
| 426:22 429:9 | role 15:17 39:18 | 304:12 388:20 | 388:2,2,4,8 454:6 | 456:3 |
| 436:20 449:19 | 292:1 353:10 | 492:10 | 454:7,10,12,13,14 | saving 291:12 |
| 452:19 462:7 | 359:17 433:5 | ruling 154:10 | 478:4 | saw 73:3 74:6 |
| 476:11,20 495:14 | 486:3 499:12 | ruminant 136:8 | salesman 426:3 | 76:22 77:4 90:18 |
| 500:6,17 501:16 | rolfsii 319:15 | run 27:13 126:12 | salmon 47:9 50:14 | 119:12 137:11 |
| 507:9 518:14,14 | rollover 427:21 | 140:10 149:3 | 52:20,22 53:9,15 | 142:18 277:21 |
| 519:10 522:16,18 | Ron 45:22 56:17 | 171:15 181:16 | 53:16,21,22 54:11 | 285:10 399:20 |
| rights 188:5 | room 4:7 53:1 | 196:9 202:17 | 54:15,18,20 55:2 | 453:14 460:15 |
| ripe 479:17 | 194:9 207:15 | 217:18 232:7 | 55:9,11 56:6 62:7 | 469:6 522:10 |
| ripple 456:9 | 358:16 459:16 | rundown 108:8 | 62:17 69:22 73:20 | saying 31:21 92:8 |
| rising 231:19 | 515:2 523:14 | running 268:2 | 86:10,18,19 102:3 | 146:20 152:12 |
| risk 71:3 200:18 | root 294:5 329:16 | runs 6:12 489:14 | 171:13,15 174:18 | 247:14 255:10 |
| 201:10 205:9 | 353:2 361:22 | rural 456:17 | 175:19 176:7,14 | 267:19 309:6 |
| 212:21 222:11 | 372:14 377:11,18 | 491:10 494:15 | 430:19 | 356:19 374:14 |
| 228:8 232:1 | 377:20 378:3 | rushed 382:1 | salmonella 125:1 | 376:9,14 377:2 |
| 240:14 242:16 | 384:9 426:1,6,7 | russet 201:19 | salmonids 69:20 | 406:16 433:17 |
| 247:6 253:8,9,10 | 445:20 | 403:22 404:1,4 | salt 310:18 311:2 | 466:14 514:2 |
| 253:13 262:14 | roots 328:15 | 406:12,13 | 311:19 312:7 | 522:11 |
| 268:5 308:5 | rot 324:13 | Rutgers 204:14 | 318:13 331:12,16 | says 7:11 19:4 |
| 344:22 349:19 | rotate 317:2 | R&D 461:6 | 332:8,10,22 333:2 | 88:11 164:11 |
| 351:18 359:20 | rotated 52:1 | | 333:4,7,12,14,17 | 165:5 278:19 |
| 363:3,7 382:6 | rotation 52:9 71:18 | S | 333:22 335:20 | 279:5 280:5 325:3 |
| 408:7 443:8 445:4 | 220:17 223:10 | s 4:1 15:15 | 336:8,12 338:7,12 | 325:5 326:5 |
| 445:11 446:12 | 326:20 496:5 | sac 55:15 | 339:16 340:6 | 344:18 345:9,12 |
| 462:13 480:5 | rough 184:6 | Sacrificing 446:7 | sample 361:14 | 345:22 346:6,15 |
| 481:9 498:16 | round 15:15 23:14 | sad 156:3 | 423:14 424:18 | 347:1,2,7,13 |
| 502:14 521:22 | 23:18 350:12 | sadly 437:15 | 440:8 | 348:7 349:11 |
| risks 205:10,11 | 352:19 410:8 | sadness 159:8 | sampled 234:15 | 426:6 483:16 |
| 225:6 253:6,7 | 520:6 | safe 164:9,13 182:6 | samples 234:15 | 485:2,7,11 515:19 |
| 308:13 369:14 | route 91:4 | 201:7 202:2 | 264:21 278:11 | 515:21 521:9 |
| 393:11,20 481:21 | routes 73:18 259:4 | 298:18 308:3,4 | 410:22 411:3 | scab 276:13,14,17 |
| 493:2 | routine 493:19 | 341:5 491:9 | 416:2 423:6,10 | 276:21 277:15,21 |
| River 198:6 459:12 | routinely 264:9 | safely 338:15 | sampling 245:3 | 277:22 304:2 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| scaffold 27:13 | sciences 97:15,16 204:14 230:13 | seasonality 111:11 144:7 | 82:13 84:9,11 86:1 89:20 90:11 102:9 103:9 113:12 118:17 126:16 132:17 135:3,11 138:9,9 138:20 139:16 140:13 147:9 153:19 154:17 156:2,3 170:12 171:16,20 178:16 210:8,11 214:12 214:20 222:17 225:8,9 231:12 245:15 248:14 252:19 253:19 257:4 277:9 278:12 316:7 317:21 318:2 319:9 325:17 327:19 329:13,15 338:20 341:6 342:15,15 358:17 365:3,4 369:20 381:16 401:13 403:8 404:7,10 406:14 410:9 411:18 417:20 418:8 420:13 435:16 452:5,9 462:7 466:8,11,12 476:19 484:15 485:1 494:16 513:17 515:9,10 520:22 521:2 | seeking 17:18 26:20 seeks 26:3 seemingly 112:12 112:17 113:5 seen 41:15 103:4 135:5 139:1 140:4 158:9 159:8,10 171:2,15 174:17 179:8 182:20 183:2 198:5 202:9 212:11 239:14 277:3 334:18 340:20 360:21 377:5 380:20 396:1,3,4,8 397:4 397:9 399:14 406:13,17 432:15 448:9 460:12 496:7 sees 238:10 239:17 segment 321:18 324:9,16 select 236:5 selected 456:10 selecting 209:11 221:7 259:9 selection 213:5 220:22 228:5 240:21 261:3 359:21 selective 209:8 213:11,21 233:1,5 270:9 408:22 self 519:22 self-assessment 223:18 sell 72:2 139:7 179:20 201:1 251:20 380:4 392:6 400:2 518:3 521:19 selling 102:3 145:21 201:14 391:8 426:4 sells 55:5 semi-annual 25:11 |
| scale 68:3 140:15 248:3,6 251:22 294:22 361:17 463:19 464:2,3 466:1,4,5,18,18 491:3 scale-up 252:6 509:6 scarce 409:16 scare 512:8 scared 389:17 scary 346:4 scattered 405:11 418:6 scenario 80:10 91:22 307:2 410:11 431:12 scenarios 437:17 schedule 28:12,21 30:2 98:8 107:1 309:19 474:15 scheduled 9:13,14 196:5 280:21 281:2 298:6 316:4 445:9 447:20 schedules 243:12 scheduling 523:3 scheme 484:1 school 57:18,19 73:7 229:15,16 473:21 schooling 87:9 schools 516:21 Schwartz 485:19 490:12,14,15 science 69:11 95:12 131:16 137:8 156:13 162:5 169:19 230:2 266:20 295:5 382:2 390:3 460:5 460:15 461:5 465:21 492:17 501:14 504:6 506:16 507:8,17 509:21 | scientific 119:19 134:2 152:20 177:1 297:17 348:6 360:6 421:20 444:2 456:11 509:10,20 scientifically 294:10 scientist 46:2,3,8 161:18 179:6 scientists 101:17 156:16 179:19 199:18 450:5 scientist's 507:20 sclerotium 319:15 Scotland 52:13 59:12 171:3,5 174:21 176:8,9 Scott 118:16 130:7 Scottish 504:13 Scott's 476:18 scouting 263:8 screen 7:12 61:19 119:10 208:22 326:17 327:19 screened 323:9 326:8 screening 202:18 321:19 326:9 scrutiny 172:13 se 81:14 275:16 sea 60:10 96:15 174:16 seafood 46:13,17 46:20 47:4,5 50:8 104:3,8,12,16 seafoods 47:10 seal 103:20 115:12 searching 351:12 season 6:18 199:22 202:12,13 272:15 362:3,5 410:16 509:5,15 | seasons 455:21 seat 107:14 343:1 Seattle 218:19 287:5 295:1 407:9 412:7 seaweed 200:10 250:14 Sebastian 43:11,13 44:17 45:14 49:12 66:1 76:5 79:9 81:4 92:12 93:14 second 38:5,6 40:7 40:9,12,13 49:6 92:3 122:5 123:21 127:17 128:19 200:3 204:5 207:1 233:4 246:11,16 252:18 267:10 276:12 305:2 316:21 331:19 376:4 443:11 487:15 secondary 427:21 473:11 seconds 491:18 second-most 64:15 secret 301:19 499:6 Secretary 13:9 section 11:15 15:6 15:17 19:11 21:20 39:7,17 55:6 76:2 109:22 116:20 117:6 133:9 220:8 222:20 224:13 311:2 313:19 356:10 470:5 521:9 sector 145:19 309:11 sectors 300:14 sediment 83:7 see 7:22 35:19 53:3 53:8 57:7 59:21 61:3 62:13 64:7 64:17,19 78:2 | 82:13 84:9,11 86:1 89:20 90:11 102:9 103:9 113:12 118:17 126:16 132:17 135:3,11 138:9,9 138:20 139:16 140:13 147:9 153:19 154:17 156:2,3 170:12 171:16,20 178:16 210:8,11 214:12 214:20 222:17 225:8,9 231:12 245:15 248:14 252:19 253:19 257:4 277:9 278:12 316:7 317:21 318:2 319:9 325:17 327:19 329:13,15 338:20 341:6 342:15,15 358:17 365:3,4 369:20 381:16 401:13 403:8 404:7,10 406:14 410:9 411:18 417:20 418:8 420:13 435:16 452:5,9 462:7 466:8,11,12 476:19 484:15 485:1 494:16 513:17 515:9,10 520:22 521:2 seed 26:8,14 61:12 75:3 515:14,22 516:5,7,13,14 seeing 31:16 37:4 37:12 38:10 41:21 80:5,20 112:16 135:18 231:18 258:21 394:12 459:15 516:15 518:19 seek 15:10 39:11 419:5,7 | |

| | | | | |
|------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| send 153:16 162:11 435:19 | service 1:1 229:6,7 229:19 265:9,10 387:12 388:7 | shared 131:7 393:15 | 243:19,19 334:12 454:16 471:3 | signs 464:20 485:6 |
| senior 167:15 190:16 | services 47:1 216:10 217:15 520:4 | Sharon 141:4 149:16 152:5 153:8 | showing 262:14 275:1 278:21 419:22 498:6 | sign-on 169:8 |
| sense 33:9 140:17 279:10 295:6 325:15 328:13 330:7 485:15 | servings 47:3 | sharpen 476:22 | shown 232:22 303:8 407:16 470:12 | silk 337:13 |
| senses 57:17 | session 20:5 32:3 40:17 107:9 | shed 118:18 | shows 63:10 134:20 170:10 184:7 202:1 356:8 408:15 | silo 61:19 |
| sensible 129:2 | set 27:17 36:5 48:14,21 57:6 135:10 331:3 410:1 411:10 | sheds 274:9 390:16 | shrimp 46:7 47:9 65:6,10,10,13,16 65:16 77:16 164:22 165:6 | silos 61:15 |
| sensitive 34:21 | setback 456:5 | sheep 130:1 | sick 27:15 135:5 344:19 346:5 503:22 | similar 166:4 173:10 212:11 214:10 244:8 246:14 255:9 359:13 373:18 429:1 473:10,12 |
| sensor 57:17 | sets 257:6 418:18 | shelf 252:4 420:17 | side 53:2,4 54:16 54:16 58:18 82:8 255:14 288:20 308:11,14 355:14 355:14 357:19 462:11 464:4 466:7 467:1,5 515:9 | simple 96:2 127:11 263:17 502:5,7 |
| sent 24:11 75:8 122:13 374:18 378:17,20,22 379:1,2 440:10,11 | setting 235:18 242:3 261:18 306:21 307:17 | shellfish 50:5 53:10 53:14 55:18 56:1 61:11 89:11,12 | Sherman 141:4 149:16,18 152:11 152:14 | simpler 513:4 |
| sentence 310:9 485:10 | settle 107:14 | Sherman-Burton 22:13,22 23:3 | shift 214:12 253:16 430:7 431:14 | simplify 368:7 |
| sentences 310:4 356:6 | seven 5:6 21:2,6 230:12 330:12 396:3 411:3 423:10 471:1 476:17 | shelves 420:10 | shifts 255:18 256:3 279:8 | simply 25:19 47:17 121:17 133:2 146:16 150:21 226:5 239:11 304:14 347:6 409:10 447:11 450:4 455:10 480:7 481:1 |
| sentiality 111:3 | settled 4:4 | Sherman 141:4 149:16,18 152:11 152:14 | shines 5:14 | single 47:8 158:14 187:5 319:9 346:7 422:4 428:8 463:2 465:19 509:3 |
| sentinel 75:5,6 266:22 | settles 107:14 | shifter 192:5 | shistar 192:5 | sir 192:4 |
| separate 88:2 89:4 115:7 | setting 235:18 242:3 261:18 306:21 307:17 | shocked 349:15 | shocked 349:15 | sister 187:15 |
| separately 55:13 | settings 245:8,11 245:13 503:18 | shoot 289:4 | shoot 289:4 | sight 234:10 |
| sequence 235:14 414:17 | settled 4:4 | shops 504:14 | shops 504:14 | Sigma 207:12 |
| sequencing 212:3 | settles 107:14 | short 24:21 252:5 272:13 274:2 308:18 330:7 331:4 383:13 443:14 | short 24:21 252:5 272:13 274:2 308:18 330:7 331:4 383:13 443:14 | sign 34:6,11 485:5 507:11,13 |
| Serenade 273:4 | seven 5:6 21:2,6 230:12 330:12 396:3 411:3 423:10 471:1 476:17 | shorten 425:10 | shorten 425:10 | signal 435:19 |
| series 49:15 71:21 343:4 443:16 | severe 189:11 347:8 368:22 455:22 462:20 | shorter 331:2 | shorter 331:2 | signatures 291:1,1 291:2 440:2,3 |
| serious 68:7 96:4 125:4 238:16 243:1 260:1 267:14 319:22 427:6 519:20 | severity 424:1 | short-term 383:8 | short-term 383:8 | signed 9:12 12:18 22:12 133:8 293:7 344:7 358:18 |
| seriously 218:4 306:7 320:14 | sewage 176:15 | shot 473:5 | shot 473:5 | signal 435:19 |
| serve 156:16 309:16 365:17 370:8 458:22 | sewer 75:2 | shots 473:7 | shots 473:7 | signatures 291:1,1 291:2 440:2,3 |
| served 181:22 229:12 230:12,14 365:16 387:3 | sexual 154:22 157:20 | show 45:1,5 49:15 49:17,20 61:22 84:4,19 106:14 138:22 237:3 241:6 356:21 419:17 420:18 423:8,18 | show 45:1,5 49:15 49:17,20 61:22 84:4,19 106:14 138:22 237:3 241:6 356:21 419:17 420:18 423:8,18 | significance 380:15 291:2 440:2,3 |
| serves 216:18 230:20 | Shade 500:14 507:10,16,17 | showed 98:10 | showed 98:10 | sighted 9:12 12:18 22:12 133:8 293:7 344:7 358:18 |
| | shadow 309:14 | | | significant 34:4 231:17 242:15 259:15 260:13,19 261:11 262:10 293:1 297:18 375:3 394:22 |
| | share 5:4 9:21 14:4 17:6 98:21 127:6 127:16 134:6 157:3 300:20 495:2 503:1,14 | | | significantly 71:12 237:9 308:7 |

| | | | | |
|----------------------------|----------------------------|---------------------------|---------------------------|----------------------------|
| 358:6 406:3 | slow 30:6 | sold 59:12 103:17 | 428:12,12,14 | soybean 101:13 |
| 422:20 509:18,22 | slowly 5:11,18 94:3 | 368:12 446:6 | 433:14 436:18,18 | 157:11 161:8 |
| 515:12,13 517:18 | 389:3 | 448:5 521:12 | 465:18 | space 30:21 164:3 |
| situations 20:3 | slurry 77:4,4,14 | solely 451:7 | sort 33:5 35:1 | 166:12 |
| 28:2 151:12 | small 34:11 56:6 | solids 80:2 | 68:13 91:16 108:7 | spaced 73:19 |
| 227:21 248:4 | 60:7 62:2 101:7 | Soller 278:6 | 112:18 113:1 | spacing 223:11 |
| 254:17 406:6 | 114:2 166:11 | solution 292:17 | 114:1,3 116:7 | span 399:8 |
| 446:4 | 180:20 182:18 | 294:6 380:17 | 122:11 129:6 | sparingly 346:19 |
| six 18:3 44:21 | 236:3 255:7 304:5 | 382:18 395:13 | 130:4,16,22 139:5 | 347:22 |
| 133:22 148:6 | 309:15 339:20 | 499:18 514:5 | 142:12 146:21 | speak 148:9 185:5 |
| 175:20 382:12 | 357:20 361:14,16 | solutions 293:22 | 198:19 200:7 | 260:16 320:22 |
| 396:2 399:8 406:5 | 362:18,21 377:18 | 351:20 353:1 | 203:4 235:21 | 350:8 362:19 |
| 425:14 447:7,8 | 411:10 425:9 | 389:6,7 397:14,17 | 247:2,14 248:2,18 | 400:13 406:20 |
| 470:19 472:21 | 426:15 440:8 | 482:9 | 248:19,19 251:6 | 453:4 474:16 |
| 476:16 | 441:19 442:22 | solve 128:4 | 251:16 258:18 | 494:22 495:3 |
| size 53:1 87:10 | 447:4 466:17 | solved 497:13 | 260:4 263:3 | 519:9 520:15 |
| 443:1 478:13 | 474:6 | solvents 67:12 | 291:10 414:15 | speaker 196:22 |
| 479:7 | smaller 175:17 | solving 175:22 | 450:15 452:14 | 197:6 204:5 |
| sizes 145:4 | 248:3 | somebody 162:8 | 462:5 463:19 | 215:22 228:17 |
| skewed 374:14 | Smith 273:15 | 178:17 233:20 | sorting 133:1 | 520:12 |
| skin 200:19 240:17 | 310:21 331:7,10 | 259:19 446:18 | sorts 35:15 74:3 | speakers 196:21 |
| 424:6,11 | 331:11,15 335:6 | someplace 166:13 | sound 34:3 129:1 | 376:6 |
| sky 5:7 | 335:12,13,15 | somewhat 98:3 | 169:19 390:3 | speaking 8:14 |
| slaughter 58:16 | 339:4 341:9 | 253:7 267:8 | 492:22 494:1 | 133:17 198:3 |
| 59:5 66:2 67:11 | smooth 7:6 | 460:10 | sounds 33:11 182:9 | 231:21 239:22 |
| 76:8 77:3 | snowed 518:12 | son 506:2 | 269:19 374:13 | 246:1 274:12 |
| slaughterhouse | soaps 493:19 | sonar 57:17 | 513:22 | 331:11 386:3 |
| 64:3 | social 35:16 87:8 | SONNABEND | soup 5:8 | 467:6 |
| slaughtering 58:19 | societies 501:11 | 1:21 38:14 42:3 | source 114:22 | special 339:12 |
| 76:16 | society 59:4 119:19 | 87:17 173:19 | 147:17 150:11 | 400:22 |
| slide 8:7 11:2 12:6 | 246:2,5 | 253:21 256:9 | 168:22 183:8 | specialist 2:14 |
| 45:5 52:11 54:8 | soil 5:22 207:4,5 | 274:20 277:17 | 380:10 427:8 | 15:18 39:19 |
| 60:22 98:9 160:6 | 210:12,16,19 | 283:11 301:10 | 454:21 455:4 | 386:22 392:20 |
| 407:17 408:6,12 | 220:18 223:12 | 355:4 364:12 | sourced 67:15 | specialists 224:17 |
| 409:7 410:7 | 234:11 269:15 | 434:21 | sources 13:19 | specializing 228:21 |
| 454:15 461:9,10 | 278:20 279:1,4,6 | soon 498:19 515:19 | 55:21,22 82:19 | specialty 380:9 |
| 461:11 466:21 | 279:9,13 312:14 | Sophie 22:13 23:4 | 101:20 144:15,18 | 425:13 |
| slides 9:17 10:4 | 325:5 326:1 327:1 | sophistication | 147:9,10,14 | species 69:21 73:18 |
| 45:1 49:15,17,20 | 327:7 328:10,19 | 121:5 | 183:16 204:19 | 73:19 74:5 83:7 |
| 59:16 73:4 74:7 | 329:5 330:14,15 | sore 504:20 | 241:18 | 83:16 84:5,13 |
| 233:21 243:17 | 331:1 336:18,21 | sorry 72:4 109:9 | south 496:2 511:3 | 88:21 96:16 |
| 253:6 281:14 | 337:1,6 338:2,3 | 110:13 138:16 | Southeast 362:16 | 105:12 129:22 |
| 298:22 305:20 | 408:17,21 496:10 | 141:5 166:20 | Southern 186:13 | 143:16 145:5 |
| sliding 140:15 | 499:22 | 191:5 233:21 | 319:15 340:13 | 148:7 225:10 |
| slightly 8:8 115:5 | soils 209:15,15,21 | 370:4 374:9 | 511:4 518:4 | 234:21 235:2 |
| 422:12 | 210:6 214:11,14 | 386:17 404:22 | Southwest 1:11 | specific 79:8 94:2 |
| slippage 435:13 | 228:6 325:9 409:5 | 405:3 422:9 | soy 101:12 | 99:13 116:19 |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 139:14 143:16,16 160:18 225:6 237:13 269:19 270:2 295:20 299:5 301:14 330:22 335:21 363:10 383:15 489:10 490:6 509:14 specifically 13:8 17:10 143:18 193:14 218:16 220:6 221:21 223:6 226:21 233:6 244:6 260:6 260:15 269:6 286:5 334:19 343:6 345:7 348:7 384:8 414:9 487:6 492:13 specify 117:7 spectrum 312:12 323:21 325:22 328:12,13,17 329:4 333:18 339:14 355:13 358:13 499:2 speculating 280:8 speed 43:18 44:5 93:11 274:3,17 276:7 507:5 spend 163:20 434:3 spending 107:19 spent 111:1,2 118:10 461:5 spiders 337:14 spinning 206:7 spirit 128:18 302:19 spirited 195:10 split 295:10 317:22 318:2 396:9,10 397:2 488:6 spoiled 196:2 spoke 397:21 498:1 sponsored 17:14 496:22 | spontaneous 151:3 spontaneously 232:14 502:22 spot 384:14 436:21 spots 320:2 347:14 spray 200:17 210:13 213:10 214:12 251:21 256:15 261:5 267:19,20,22 273:10 299:8 373:16 399:3 476:2,5 521:9,12 sprayed 213:17,20 214:1,18 215:3,9 215:11,12 239:3,8 256:14 257:22 346:12 348:15 361:19 464:16,17 513:11 521:11 sprayer 477:19 spraying 239:15 359:20 416:15 449:20 476:3 520:7 sprays 208:4,20 257:1 362:4,4 spread 5:21 6:3 170:20 180:6,17 220:20 221:11 232:20 237:20 241:12 418:5 427:9 spreads 174:15 479:8,9 spring 25:4 26:11 49:1,10 276:7 295:2 479:17 481:8 485:12 springtime 472:15 spun 118:11 square 210:15 squash 6:4 stability 352:2 stability's 209:22 stable 388:9 496:11 staff 2:10 40:19 | 118:15 130:7,13 179:19 216:10 218:2 224:12 228:1 494:8 staffing 10:19 35:14 stage 61:13 143:16 154:14 160:12 183:21 271:19 351:3 473:6 staged 134:22 stages 16:21 145:4 146:16 148:8 185:11,15 263:10 509:14 stake 438:8 509:5 stakeholder 132:9 218:3 292:19 385:14 stakeholders 15:1 15:13 17:20 21:22 23:16 24:13 39:14 132:3 152:10 284:12 285:22 288:5,18 300:20 301:8 351:22 365:19 369:17 385:15 441:2 staking 200:7 stalled 104:5 stand 317:1 392:21 481:22 standard 51:3,22 59:7,9 61:8 66:3 68:1 77:10 82:1,5 82:22 89:4 103:17 104:13,17 112:9 115:6,7,9 137:10 151:14 171:13 175:14 177:14 220:10,11 222:13 225:5 269:7,9 308:9 371:4 377:20 431:9 437:3 469:2,8 471:12,20 475:11 488:19 489:19 | standards 1:5,10 2:16,18 7:15 13:6 13:11 19:6,9,9,12 19:12,14 30:3,7,8 30:12,15,17 31:4 31:7 44:20 45:8 47:6,9,13,15,17 47:20 48:4,14,17 48:21 50:1,15,21 51:11,14 52:16 56:12,22 57:14 58:11,15 64:4,9 65:15,22 66:3,5,5 67:7 70:12,16 71:15,21 74:12 76:6 81:4 84:1 86:22 88:1,3,4 89:6 91:2 97:8,9 97:13 104:4,9 105:5,15 108:12 108:16,17 115:11 142:8 170:17 171:9 220:9,14 222:7,20 224:20 226:5 228:14 287:17 290:1 293:3 350:20 354:7 356:11 368:18 387:5 388:19 394:20 395:5 429:21 430:3 442:21 489:3,13 standing 452:10 standpoint 128:6 stand-alone 469:5 staple 381:1 Star 462:15 start 4:11 7:6 37:19 38:11 41:22 50:22 60:15 83:13 121:11 139:22 141:5 149:3 160:10,10,14 161:3 194:16 252:19 281:18 283:10 287:6 | 327:20 335:17 355:16 411:11 427:18 434:13 455:21 476:3 501:19 507:12 515:21 started 7:21 33:19 37:11 100:22 156:6 195:4 237:4 260:18 295:7 377:7 449:3,6 472:11 512:6 515:15,22 516:4,6 520:6 starter 75:20 starting 144:5 258:6 306:15 343:3 357:16 486:11 starts 84:16 260:2 358:16 start-up 154:20 state 15:16 46:4 50:18 95:20 112:6 178:14 197:9 199:21 204:9,12 216:2,4,21 217:13 217:17 218:6,12 218:17 221:9,20 228:8 282:5 283:19 297:16 344:13 365:13,15 367:19 369:18,21 370:9 377:5 378:1 387:6 402:6 407:5 411:4 425:4 444:7 444:10 450:3,20 486:2 491:3 497:1 500:22 509:2 stated 160:22 301:16 327:3 340:11 386:14 405:9 statement 19:16 293:6 333:11 424:9 statements 302:15 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 409:7 487:8 491:19 states 1:1 18:21 27:18 46:19 47:12 50:10 63:3,15 65:17 112:3 270:9 271:3 303:13 305:5 402:5 408:20 453:19 statewide 321:11 state-wide 490:21 static 263:4 stating 298:15 304:14 statistically 293:1 statistics 218:12 stats 171:1 status 139:18,19,19 299:10 411:16 481:11,14 statutory 18:19 19:18 stay 493:8 stays 437:14 steel 54:10 Steiner 153:9 161:14,16 165:21 166:9 167:1,3,8 342:4 stem 340:12 stemming 20:12 stems 18:20 step 111:15 130:18 184:17 188:11 436:14 481:13 509:20 stepping 185:10,10 steps 89:22 130:14 299:19 354:16 429:11 step-down 157:4 188:14 Steve 22:14 27:7,8 31:11 stewards 443:5 stewardship 100:10,21 | stick 344:2 460:20 sticker 485:2 sticks 485:7 Stillman 346:6 stipulates 301:13 stock 181:13 185:3 377:18,20 426:1,6 426:7 stocked 86:19 stocks 66:18 294:5 353:2 361:22 372:14 377:11 378:3 384:9 445:20 Stockwell 204:6 205:1 215:22 239:2 242:1 244:10 245:14 253:22 254:14 256:18 257:16 258:5 279:11,20 280:2,6 Stockwell's 255:11 stone 1:12,15,22 4:3 6:20 22:11 23:1 27:3,6 31:11 32:2,13 33:15 35:10 36:14,17 37:4,16 38:4,7,10 39:3 40:6,10,13 41:2,18,21 42:14 77:20 78:1 85:15 87:16 92:10 98:19 101:4 102:6 104:20 105:16 106:17,21 107:8 108:4 109:1,4,8 109:12,15 110:13 133:7 139:2 140:19 146:6 147:3 149:12 152:4 153:7 156:21 159:1,20 161:10,14 165:16 166:19 167:2,6,10 172:18 173:18 174:22 176:5 | 177:3 178:1 181:3 181:20 182:11 184:3,11 185:7,18 186:8 191:5 192:3 192:5,17 193:4 194:2 195:3 243:9 247:21 248:8 280:16 285:15 315:17 320:2,7,19 324:18 326:19 328:20 331:6 334:2 335:10 338:17 340:8 342:2,5,13 347:18 348:3 349:22 355:2 357:4 358:14 363:12 364:9 365:6,9 370:3,11 374:11 375:17 378:10,14 379:8,11 384:1 385:4 386:15 390:7 391:4 392:13,15 395:19 398:2 403:2 404:19 406:21 411:22 415:11 418:16 422:10,21 424:19 427:12 428:11 429:13 434:19 435:21 438:5 439:18 441:14 446:15 448:11,18 450:9 452:19,22 457:13 459:2,6 467:11,14 467:18 471:22 474:11 477:9,17 477:21 482:13 484:8 485:18 490:9 495:9 500:7 500:12 505:20 507:9 510:18 514:12,17 517:12 519:12 522:16,19 523:10 stop 34:11 54:1 | 204:2 215:19 228:15 245:18 346:13 463:12 502:11 511:22 512:1 stoplight 316:14 stopped 375:14,14 stopping 463:14 stops 336:15 storage 293:17 store 163:3 201:1 207:13 523:6 stores 388:10 485:1 stories 480:12 storm 262:20 263:11 400:7 424:2,4 storms 471:1 story 167:22 345:6 straightforward 483:10 strain 206:9 strains 73:19 209:12 231:15 232:2,14 233:8,15 233:16,17 234:21 235:1,7,8,12,15 235:16 236:5 240:9,12,15 241:1 241:18 255:19 strategies 197:16 227:10,17 353:7 510:4 strategy 490:8 520:13 Strauss 125:14 129:17 strawberries 517:22 stream 295:9 strength 490:8 strep 446:21 447:1 447:2,13 streptococci 504:22 505:4 streptomyces 312:1 streptomycin | 205:14 213:21 214:7,15,15,19 239:3 243:21 254:13 288:9 370:21 375:10 409:9 streptomycin's 205:15 stress 76:9 77:10 501:13 508:13 stressed 64:12,13 87:11 stresses 297:14 stretch 21:19 stricken 480:15 strict 66:2 325:15 strictest 57:2 strictly 440:4 strides 369:13 480:20 strike 481:7 strikes 485:17 stringent 354:16 strips 145:22 strive 427:5 471:12 490:7 strong 231:22 276:1 288:12 357:1 443:7 strongest 435:18 439:15 strongly 23:21 207:20 246:4 290:8 347:4 367:5 structure 214:8 326:6 struggle 494:10 struggled 69:16 struggling 179:3 Stuart 237:1 stuck 459:16 students 501:3 studied 216:5 329:7 studies 94:10 214:18 232:22 236:19 237:1,12 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 238:3,5 239:1,2 244:11,20,21 245:21 257:8 258:6 308:22 334:7,18 337:11 360:6 404:18 419:10,12 422:7 444:2 506:19,20 508:17,19 509:20 study 48:9 86:18 152:2 176:18 187:14,22 188:4,5 189:4 190:7 191:18 213:19 234:5 238:22 245:1 254:21 256:19 279:22 280:7,11 307:16 321:6 334:7,11 336:2 409:20 410:4 414:10 416:6,19 417:9 419:11 421:3,22 423:5 496:19,22 stuff 59:11 121:19 157:12 345:19 440:2 476:14 506:5,9 stunned 76:20 stunner 58:22 stunning 77:1,14 subcategory 15:7 39:9 subcommittee 3:8 3:15,20 6:22 7:3,8 7:13,17 9:22 10:8 10:18 11:14,22 17:13 18:1,4 20:4 20:6,12 22:8,10 26:3 30:1 37:6,10 87:19 107:10,16 107:18 110:3 111:2 118:12 119:5 130:15 131:14,20 133:12 142:15 192:13 193:9 196:15 | 282:16,22 283:17 285:4,5,17 286:20 288:1 289:9,17 290:11 291:22 305:9 310:8 311:8 311:11,18 314:2 317:9,13,22 352:12 366:1,7 486:22 490:4 491:4 subcommittees 8:3 11:5 33:4 Subcommittee's 331:22 subject 287:20 subjects 32:9 283:16 sublethal 213:14 submission 282:4 submissions 331:14 submit 304:8,16 submits 35:6 submitted 20:8 109:19 202:6 226:15 290:22 293:8 296:19 297:22 310:21 313:12 331:17,20 332:1,4,7 334:6 337:12,21 419:15 submitting 24:22 25:9 122:21 168:4 224:2 349:13 subsequent 230:10 311:13 substance 226:1 301:1 311:5,20 312:8 313:14 479:22 substances 19:1 74:11 75:15 101:2 117:9 223:2 226:17 289:13 293:16 substantial 258:1 393:6 substantially 45:9 | 63:4 substitute 24:1 204:1 substitution 373:17 substrate 497:10 subtherapeutic 213:7 306:22 subunit 119:15 subvert 442:20 sub-therapeutic 233:12 234:6 235:19 236:4,21 262:2 succeed 372:2 402:22 495:8 512:18 success 278:12 291:19 351:15 407:22 408:2 438:9 457:2 475:7 509:16,19 successful 55:3 265:22 294:19 376:10 381:20 493:3 successfully 510:7 succinct 344:17 sudden 512:9 suddenly 259:22 261:19,20 suffer 160:13 388:14 suffered 502:3 suffering 138:19 502:13 sufficient 236:5 245:7,10 265:4 402:8 412:9 suffocate 159:19 suffocation 77:9,11 sugar 6:5 suggest 24:10 26:21 124:17 258:7,20 436:11 suggested 21:21 164:8,13 447:19 suggesting 330:20 | 452:14 suggestion 444:22 521:5 522:7 suggestions 20:9 24:20 299:13 442:18 suggests 258:15 suitable 303:5 411:19 suits 161:20 sulfate 200:6,9 250:13 252:8 273:17 372:18 sulfates 250:17 sulfur 135:21 136:9 136:19 138:7,21 140:10 155:10 277:8 278:7 323:5 372:18 449:1 488:13 sulfurs 153:20 327:4 summarize 94:16 119:11 138:18 168:9 314:17 466:22 summary 115:13 119:9 203:5 324:14 summer 63:20 189:3,9 203:15 251:4 273:8 sun 5:14 6:5 Sundin 274:22 sunlight 186:3 207:22 208:7 210:18 257:18 sunset 20:7 68:12 95:4 260:11 272:11 286:18 292:21 352:19 366:18 394:20 448:3 478:20 supplement 172:11 173:13 supplementation 134:8 | supplemented 150:20 supply 102:1 114:22 182:7 199:18 274:9 315:12 369:15 388:8,9,13 392:8 402:8 514:10 support 15:19 16:18 39:20 110:2 132:20 156:14 185:16 217:21 227:13 282:15 284:16 290:9 291:17 293:2 296:4,14,21 297:13,22 298:14 301:11 304:11 311:7 314:1 330:18 331:11 333:21 352:10 363:5 381:9 388:15 395:3 455:8 456:15,22 478:15 482:7 487:3 494:4 505:18 511:16 517:21 518:2 520:14,18 supported 382:12 supporters 429:20 supporting 290:15 290:19 291:3,10 292:5 294:12 295:16 297:10 298:2 366:9 491:9 supportive 16:7,9 36:1 supports 23:13 290:9 291:22 293:8 354:4 365:22 366:5 383:13 431:16 491:7 supposed 157:19 164:6 165:3 437:3 438:15 473:1 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| suppress 199:1 221:11,22 311:3 | 361:21,22 373:5 377:19,21 381:6 382:8 | system 14:8 36:13 51:22 60:15 65:18 66:6 71:6 74:15 79:11 80:11 83:4 84:20 85:6,19 90:1 92:5 95:4 136:15 137:3 155:22 187:8,9 219:1 222:2,22 223:4,5,14,15 224:16 225:1,14 225:19 226:15 230:4 295:4 297:20 299:16 316:15 355:22 386:11 417:20 431:10,11 439:14 445:14 491:12 494:14,20 499:21 | 36:10 68:15 90:21 104:18 116:14 121:14 130:15 131:14 136:10 138:2 147:17 148:12 161:2 182:2,4,8 190:9 194:6 198:19 202:10 206:22 218:3 241:5 245:2 250:10 252:19 255:2,3 260:18 288:7 300:7 301:8 302:12 309:22 342:7 354:17 373:11 382:14 396:1 400:5 402:2 414:12 415:1 420:1,6,15 428:20 432:5 434:13 452:6 455:20 460:3 473:15 474:14 477:1 498:16 510:13 513:20,20 514:2,6 514:6 515:14 521:22 522:5 | 205:2 213:14 232:21 249:19 254:11 283:7 357:21 376:20 405:9 425:9 429:3 429:5 430:6 432:4 432:17,19 433:4,6 498:22 501:4 522:13 |
| sure 35:1,4 37:7 40:22 41:14 43:20 51:12 89:20 90:20 97:14,21 98:3 100:16 124:9,21 126:21 151:19 179:21 185:5 231:6 235:15 247:16,18 282:2 288:18 303:16 318:1 348:9 376:21,21 386:2 428:16 430:3 436:10 459:21 460:2 498:5 505:16 522:12 | suspect 97:16 suspended 60:21 sustainability 500:20 sustainable 216:3 297:21 490:22 491:11 493:3 494:6,14,14 sustainably 85:5 Sustaining 218:13 swath 476:11 swimming 62:17 73:1 swings 400:21 Swisher 345:22 Swiss 247:1 249:6 switch 425:13,18 425:19 switching 87:18 436:3 Switzerland 214:9 247:5 symptoms 151:10 182:22 synergy 51:16 synthase 329:20 synthesis 336:13 synthesize 150:22 synthesized 113:14 synthetic 67:12 72:3 77:13 96:1 108:6 112:15,19 112:20 113:2,8,10 113:13 115:1,3 139:8 141:3 148:19 221:13 225:22 289:12 307:3 311:20 312:4,8 315:1 318:14 324:16 353:11 465:11,12 488:15 511:18 synthetics 298:12 298:17 481:18 | systems 45:2 70:21 73:4 79:18 86:4 88:10 105:12 112:7 168:16 170:5 175:10 177:16 198:19,20 225:3,5 227:1 299:18 308:10 352:3,14 356:2 359:11 414:10 430:18,19,22 431:8 437:4,12 438:3 490:19 492:15 496:21 508:6 S-E-S-S-I-O-N 195:1 | 250:10 252:19 255:2,3 260:18 288:7 300:7 301:8 302:12 309:22 342:7 354:17 373:11 382:14 396:1 400:5 402:2 414:12 415:1 420:1,6,15 428:20 432:5 434:13 452:6 455:20 460:3 473:15 474:14 477:1 498:16 510:13 513:20,20 514:2,6 514:6 515:14 521:22 522:5 | talked 40:16 170:21 172:6 246:8 249:5 253:4 253:20 303:18 356:7 364:3 391:2 423:14 426:20 449:8 talking 8:6 42:18 121:18 139:12,13 139:14 164:21 168:11 171:13 177:15 234:1 244:9 245:21 264:1 269:11,19 272:11 274:4 279:21 301:11 307:10 356:9 357:8 358:22 432:15 434:4,12 439:14 458:4 517:1 520:21 talks 144:10,19,20 391:9 438:11 tangling 6:9 tank 60:8 tanks 64:17 TAP 142:14 143:8 144:14,20 targeted 122:2,8 targeting 510:2 targets 337:8 Task 141:20 150:1 186:17,22 187:10 188:3,8 tasked 87:19 tasting 523:12 taught 403:5 taurine 112:21 |
| surely 481:10 surface 63:19 208:18 210:18 416:20 surfaces 208:11,13 209:5 211:14 212:2 surprise 40:21 surprised 375:4 surrender 393:8 Surround 362:5 surveillance 230:4 survey 75:2 193:19 361:9 372:3,5,6 374:17,19 378:17 378:18 381:1 440:1 surveyed 254:4 390:11,14 surveys 268:2 survival 233:8,14 survive 174:11,13 502:9 susceptibility 221:4 296:8 susceptible 261:20 | switch 425:13,18 425:19 switching 87:18 436:3 Switzerland 214:9 247:5 symptoms 151:10 182:22 synergy 51:16 synthase 329:20 synthesis 336:13 synthesize 150:22 synthesized 113:14 synthetic 67:12 72:3 77:13 96:1 108:6 112:15,19 112:20 113:2,8,10 113:13 115:1,3 139:8 141:3 148:19 221:13 225:22 289:12 307:3 311:20 312:4,8 315:1 318:14 324:16 353:11 465:11,12 488:15 511:18 synthetics 298:12 298:17 481:18 | systems 45:2 70:21 73:4 79:18 86:4 88:10 105:12 112:7 168:16 170:5 175:10 177:16 198:19,20 225:3,5 227:1 299:18 308:10 352:3,14 356:2 359:11 414:10 430:18,19,22 431:8 437:4,12 438:3 490:19 492:15 496:21 508:6 S-E-S-S-I-O-N 195:1 | taken 54:13 104:10 137:4 182:4 219:3 287:9 352:5 411:17 429:11 455:14 481:13 takeover 174:6 takes 175:20 188:15 226:9 249:22 316:6 347:15 351:21 389:4 402:4 481:3 493:3,7 494:13,18 talk 7:10 8:11,15 13:4 18:9,12 85:16 144:16 147:18 148:7 153:13,16 156:11 161:19 167:19 169:21 171:8,22 175:15,16 190:1 | talked 40:16 170:21 172:6 246:8 249:5 253:4 253:20 303:18 356:7 364:3 391:2 423:14 426:20 449:8 talking 8:6 42:18 121:18 139:12,13 139:14 164:21 168:11 171:13 177:15 234:1 244:9 245:21 264:1 269:11,19 272:11 274:4 279:21 301:11 307:10 356:9 357:8 358:22 432:15 434:4,12 439:14 458:4 517:1 520:21 talks 144:10,19,20 391:9 438:11 tangling 6:9 tank 60:8 tanks 64:17 TAP 142:14 143:8 144:14,20 targeted 122:2,8 targeting 510:2 targets 337:8 Task 141:20 150:1 186:17,22 187:10 188:3,8 tasked 87:19 tasting 523:12 taught 403:5 taurine 112:21 |
| | | table 37:15 124:21 127:22 161:20 407:16 491:7 tables 148:6 tack 90:22 422:12 tackled 438:17 Tacon 46:7 tail 155:4 take 25:17 35:13 | | |
| | | T | | |

| | | | | |
|---------------------------|----------------------------|-----------------------------|----------------------------|------------------------------|
| 113:10,14,19 | 158:8 159:8 | term 293:22 328:6 | 410:9 415:9,17,18 | 210:2,7,11 213:22 |
| 134:17,18,20 | 172:14 189:16 | 329:12 352:22 | 423:8 457:1 | 504:1 |
| 138:1 139:18,18 | 215:2,8 264:17 | 443:15 466:10 | 469:18 508:3,14 | tetracycline-resis... |
| 139:19 140:5 | 310:7 345:6 398:7 | terms 11:12 22:7 | 508:16 | 234:13,18 |
| 141:3 142:17 | 403:9 413:22 | 52:21 57:4 68:17 | tests 264:5 419:9 | tet-resistant 237:8 |
| 143:4 144:8,12 | 432:12 435:11 | 83:17,18 93:3 | 470:16 | Texas-Southwest... |
| 151:6,8 153:3 | 439:1 460:21,21 | 94:20 99:11 101:8 | tetracycline 196:19 | 229:5 |
| 193:14 | 461:4 462:8 | 119:18 130:13 | 207:2,11 208:16 | thank 4:9 6:20 7:4 |
| taxa 83:17 84:5 | 464:18 480:12 | 176:15 177:6,11 | 209:17,21 213:1 | 12:21 13:2 18:6,7 |
| 85:1 | telling 268:5 | 185:10 217:19 | 214:19 219:1 | 18:13,15,16 22:5 |
| Taylor 1:22 12:14 | 277:22 430:4 | 231:17 238:5 | 234:7,19,22 235:3 | 22:22 23:1,19 |
| 13:3 38:6,22 | tells 464:19 512:10 | 240:11 241:14 | 235:5,9,20,22 | 27:1,3,6 31:9,11 |
| 42:11 | temperature | 242:16 255:12 | 236:2,4,9,10 | 32:2 33:14 35:10 |
| teach 501:2 | 159:15 207:14 | 256:6 268:4 270:2 | 237:4,6,10,20 | 39:4 41:4 44:14 |
| team 127:21 | 371:18 | 330:14 436:14 | 240:3,7,10 242:6 | 49:13 77:21 78:1 |
| teas 516:22 517:1 | temperatures | 515:6 | 254:2,12 255:3,20 | 87:17 92:9,11,12 |
| technical 25:16 | 180:11 266:11,12 | terrestrial 70:19 | 256:1 258:12 | 95:8 98:2 105:16 |
| 110:5,7 128:9 | 399:3 | 76:7 78:20 97:14 | 259:7 261:4 | 106:17,19 107:17 |
| 130:9 139:5 217:3 | temperature-sta... | 338:9 | 269:18 270:5,16 | 109:15 110:12,13 |
| 278:17 282:17,22 | 207:15 | terrestrial-based | 270:22 271:5 | 115:15 116:1,4 |
| 307:16 311:9,12 | Temple 211:8 | 79:11 | 272:4 278:19,20 | 131:12 133:6,13 |
| 314:3,4,6,8 | temporary 258:21 | terrific 33:17 460:7 | 279:6 282:2,9,12 | 134:5 139:2 |
| 324:21 325:2 | 336:19,22 456:5 | territories 227:4,19 | 282:18 284:1 | 140:18,19 141:10 |
| 326:4 329:1 | temps 444:17 | territory 36:7 | 285:1 289:10,15 | 146:5,6 149:18 |
| 331:20 338:1 | ten 27:15 87:1 | 228:1 | 297:18 299:20 | 152:3,4 153:7,12 |
| 392:19 | 101:3 121:5 | Terry 192:5 500:8 | 301:20 302:13,14 | 156:21 157:2 |
| technically 127:14 | 133:21 134:19 | test 89:19 263:19 | 303:1 306:4 343:6 | 159:4 161:10,12 |
| technician 264:20 | 147:8 184:9 197:1 | 268:14 304:5 | 343:13 345:1,8,10 | 165:15,16 166:19 |
| technique 54:3 | 213:20 235:5 | 367:1 423:6 509:6 | 345:13,17 346:1 | 167:6,10 172:18 |
| 74:20 124:17 | 253:14 260:8 | 510:3,14 | 348:8 349:7 350:9 | 173:4,19 175:5 |
| techniques 67:8 | 262:9 265:14 | tested 303:10 | 350:10,14 351:16 | 178:2 181:17 |
| 211:12 225:21 | 330:12 379:22 | 328:15 402:7 | 352:7,17 355:18 | 182:11 184:3 |
| 263:7 479:19 | 388:3 400:4 | 416:4 478:22 | 355:20 370:20 | 185:6 186:8,19 |
| 510:6 | 409:10 425:15 | testified 168:6 | 372:10 375:10 | 188:7 191:2,4 |
| technologies 122:1 | 443:1 475:20 | 426:19 | 376:1,8,11 380:16 | 192:4,11 194:16 |
| 263:14 | 493:10 | testify 167:14 | 388:16 389:10,16 | 196:16 198:1 |
| technology 51:3 | tend 5:11 73:7 | testifying 295:1 | 390:13,21 391:17 | 204:3,21 205:1,2 |
| 58:12 61:4 99:12 | 234:4 270:14 | testimonies 274:21 | 393:21 408:16 | 215:21 216:21 |
| 122:6,7,9 123:22 | 294:9 362:1 | testimony 9:3 | 409:6 425:6 430:8 | 217:1 228:16 |
| 197:12 263:15,16 | tendency 184:7 | 168:4 192:20 | 431:14 436:4 | 231:2 242:17,18 |
| 264:12,17 265:17 | 423:18 450:17 | 281:2 340:22 | 446:20 478:15 | 242:20 243:10 |
| 266:7,21 | tenderloin 145:22 | 358:2 428:20 | 483:6 485:12 | 280:13,16 283:4 |
| teenager 190:16 | tending 6:18 | 507:21 | 491:6 506:7,19 | 283:10 284:5,6 |
| teeny-tiny 101:5 | Tennessee 346:15 | testing 201:20 | 511:8 516:17 | 285:12 286:9 |
| tell 5:19 50:11 | tent 61:16 | 264:7 273:14 | tetracyclines | 302:9 305:14,16 |
| 68:16 94:15 | tenth 52:19 | 276:2 291:18 | 205:15,17,18 | 310:17 311:16 |
| 149:20 154:22 | ten-year 141:18 | 352:14 373:7 | 207:6,20 208:21 | 313:5,6,7,8 |

| | | | | |
|---------------------------|--------------------------|--------------------------|-------------------|------------------------|
| 314:12,14,15 | 194:1 231:4 283:3 | 461:16 462:1 | 108:13 109:5 | 354:1 355:5 362:9 |
| 315:14,15 320:19 | 357:5 358:21 | 464:19 | 115:18 123:10,18 | 362:12,14 363:18 |
| 320:21 324:17,18 | 363:11 365:7 | things 5:10 35:16 | 127:4,5 128:1,17 | 363:21 364:1,4,5 |
| 331:6 334:1,2 | 370:11,12 379:8 | 51:21 53:18 56:5 | 130:14 131:13 | 364:19,22 375:20 |
| 335:9,12 338:16 | 385:3 391:5 | 57:11,13 58:18 | 132:13 138:20 | 376:12 384:15,18 |
| 338:17 342:2,4 | 415:12 422:9 | 59:18 66:14 71:20 | 144:8 164:17 | 384:19 385:6,10 |
| 347:18 349:22 | 423:1 427:12,14 | 71:22 74:3 88:6 | 166:13 168:14,16 | 385:19 386:4,6,9 |
| 355:2 358:14 | 438:6 448:15 | 94:9,10 95:1,6 | 169:18 171:1,10 | 386:14 391:15,22 |
| 363:12,14 365:6 | 450:11 459:4,9,10 | 97:4,6 98:15 | 171:18 172:14 | 392:5 397:12,13 |
| 370:1,3,3 374:9 | 477:15 482:15 | 100:4,9 101:11 | 173:5 175:13,15 | 397:20,22 404:6 |
| 374:11 375:18 | 484:10 490:9 | 102:8 124:19 | 176:3 177:5,10,12 | 404:11,17 405:3 |
| 379:9 384:1,2 | 500:5 522:17 | 130:1 131:3 146:3 | 177:22 184:16 | 406:4 411:1,11 |
| 386:15 390:6,7,9 | themes 350:13 | 149:8 154:17 | 185:9,13 189:2 | 418:22 419:3 |
| 392:13,14 395:18 | theoretically | 168:2 170:21 | 191:5 192:12 | 421:16 423:2,4 |
| 395:19,21 398:2 | 416:22 | 171:16 174:8 | 193:20,22 194:4 | 427:3 430:5 431:6 |
| 403:2 404:19,20 | therapeutic 71:4 | 175:13 176:3 | 198:4 200:10 | 431:7,19 432:10 |
| 406:21 411:2,21 | 71:17 255:12 | 179:7 182:8 | 201:18,21,22 | 432:12 433:6 |
| 411:22 412:5 | 493:17 | 187:12 194:12 | 202:12 203:4 | 434:9 435:4,11,18 |
| 418:15 424:18,19 | thereof 113:20 | 199:3 200:10 | 213:4 232:8 | 437:8,13,15 438:1 |
| 424:22 427:11 | they'd 179:22 | 201:8 202:9 213:3 | 236:17 237:15 | 440:11,18 441:3 |
| 428:10,11,11 | THICKE 1:23 39:2 | 232:11 250:10,10 | 238:2 241:21 | 452:13 458:21 |
| 429:13 434:19,21 | 42:13 147:6 | 250:11 256:16 | 242:4 245:9,20 | 459:14 460:3,16 |
| 435:22,22 441:14 | 148:18 175:1 | 265:1 272:17 | 246:20 247:10 | 460:18 461:20 |
| 446:17 452:18,19 | 261:22 328:22 | 273:4 276:6 | 248:1,2,3,5 | 463:21 464:4,5,9 |
| 452:21 453:3 | 330:2,13 338:19 | 279:15 318:20 | 249:17 250:4,19 | 465:13,20 466:4,8 |
| 457:9,11,13 459:2 | 363:14 446:17 | 322:2 330:18 | 250:20 251:18 | 474:20,22 475:1 |
| 459:4,8,17 462:3 | 447:15 477:11 | 336:10 339:10 | 252:6,8,17 253:3 | 498:10 507:14 |
| 467:10,11,14,15 | thicket 6:10 | 408:5 426:9 429:4 | 253:4,6,7,9,9,13 | 515:1,3 516:17 |
| 471:21,22 474:13 | thickly 5:9 | 431:22 432:6 | 253:17,18 254:6 | 522:22 |
| 474:17 477:12,16 | thin 60:18 | 439:22 447:22 | 254:19,19 256:5 | thinking 17:7,8 |
| 477:17 482:7,13 | thing 11:19 32:19 | 449:10 450:17 | 256:20 257:3 | 81:5 163:3 428:4 |
| 484:8,11 485:18 | 34:14 58:14 71:15 | 460:16,22 461:12 | 258:15 261:22 | 434:2 437:16,19 |
| 490:10 495:8,9,14 | 87:7 94:22 97:1 | 465:20 466:11,11 | 262:2 263:22 | 450:12 518:16 |
| 495:21 500:8,9 | 102:20 128:19 | 467:6 471:6 | 264:1,8 265:12,13 | thinning 199:4 |
| 505:20 507:9,15 | 133:4 148:3 | think 7:18,21,22 | 265:13 266:21 | 372:15,22 |
| 510:16,18,20 | 149:15 154:8 | 17:13 18:11 22:6 | 267:6,16 268:12 | third 8:9 86:1 |
| 514:10,12,16,19 | 157:20 179:7,14 | 28:2 32:7,10,20 | 268:19 273:20 | 103:17 110:4 |
| 519:5,10 | 196:13 200:20 | 33:17 36:17 41:5 | 274:3,6,7,11,13 | 127:18 163:17 |
| thankless 494:9 | 203:5 205:13 | 56:21 57:6 59:8 | 275:12 276:4 | 216:12 311:9 |
| thanks 32:17 36:13 | 206:20 212:3 | 70:11,16 71:2,13 | 277:5 279:21 | 331:21 443:19 |
| 98:20 109:14,17 | 233:11 249:21 | 76:14 78:2,17 | 280:10 288:2 | 467:21 488:11 |
| 126:21 130:6 | 250:21 251:10 | 82:3 83:3 86:14 | 300:6 306:1 307:3 | thought 4:20,22 |
| 131:10 133:7 | 287:22 319:12 | 88:4 91:8,13,17 | 313:1,3 314:16 | 50:4 78:15,16 |
| 141:11 147:6 | 334:8,9 337:15 | 91:19 93:13,16,17 | 315:17 321:15 | 124:1 460:4 522:7 |
| 149:12 158:21 | 405:8 431:4 | 93:18,21 94:5,8 | 328:5,16 340:9,12 | thoughtful 17:4 |
| 167:14 177:2,4 | 432:22 439:12 | 97:5 98:4 99:21 | 341:6 349:14 | 91:9 |
| 181:18 192:3 | 459:21 460:2,7 | 101:6 105:2 | 350:17 353:4 | thoughts 37:9 |

| | | | | |
|----------------------------|------------------------|--------------------------|---------------------------|----------------------------|
| 41:19 | time 6:16 9:4,6 | 369:7 371:4 | timings 471:10 | tolerances 257:7 |
| thousand 63:13 | 11:21 18:8 19:20 | 376:10 382:19 | tiny 163:10,13 | 307:17 418:18 |
| thousands 153:14 | 21:10 22:17 24:21 | 383:20 384:22 | 175:21 | 506:12 |
| 359:21 363:1 | 25:8,17 26:1,19 | 385:1 386:13 | tired 92:15 | tolerance-setting |
| 480:6 513:12 | 32:7 36:9 41:13 | 388:20 389:4 | tirelessly 43:14 | 254:7 421:4,13 |
| threat 58:3 297:8 | 42:22 43:2,10 | 395:2 399:10 | 367:5 492:6 | tolerant 294:5 |
| 360:14 434:7 | 55:14 56:2 60:2 | 402:3 403:7 | tissue 473:13 | tomatoes 320:7,8 |
| 470:22 503:18 | 63:22 92:14 | 404:10,20 405:13 | tissues 348:20,22 | 517:22 |
| threaten 170:19 | 100:15,18 105:1 | 407:16 412:9,15 | 348:22 349:2 | tomorrow 110:15 |
| threatening 347:9 | 105:18 107:19 | 414:12 415:1,22 | titled 348:19 | 127:3 192:21 |
| threats 297:19 | 110:12 111:2,15 | 416:9,18,18 | today 7:9 8:5 9:15 | 193:3 261:4 |
| three 8:6 9:12 | 132:10 138:4 | 417:16 423:5 | 23:5 27:11 44:20 | 267:12 315:20,22 |
| 54:18 114:8 | 141:14 150:17,18 | 425:1 426:9 | 46:14,17,17 47:9 | 438:16 473:2 |
| 127:15 141:7 | 159:12 161:3 | 428:20 431:15 | 133:17 141:15 | ton 154:3 182:21 |
| 163:21 175:20 | 162:3 168:10 | 433:4,19 434:3,18 | 151:11,12 152:8 | Tonaske 399:20 |
| 198:18 206:21 | 174:17,17 186:20 | 435:7 438:12 | 153:15 156:4 | tonight 193:5 |
| 266:13 267:3 | 188:10 190:3 | 441:11 445:18 | 167:18 205:3 | tool 35:17 354:5 |
| 280:22 281:1 | 191:3,22 192:8 | 451:20 452:20 | 231:8,14 243:13 | 393:3 394:8 |
| 282:4 289:19 | 194:6 195:9,11,14 | 456:11 457:4 | 260:12 267:12,19 | 402:16 |
| 295:17 316:15 | 195:16,22 207:5 | 464:20 468:11 | 267:20 283:22 | tools 124:11 145:6 |
| 317:14 337:18 | 208:20 211:14 | 469:13 473:20 | 289:18 314:10 | 367:16 455:13 |
| 345:4 346:7 352:4 | 214:8 234:14 | 474:15,16 478:20 | 320:22 331:11 | 456:12 463:5 |
| 356:5 373:6 389:6 | 235:10 242:5 | 481:3 482:7,8 | 341:20 342:16 | 495:8 501:22 |
| 455:9 469:11 | 243:11 245:2 | 484:18 491:7,21 | 344:16 349:6 | top 8:8 59:17 61:20 |
| 470:5,5,7 474:1 | 246:6 249:22 | 496:14 500:6 | 350:7 360:2 | 192:6 472:9 |
| 486:1 | 250:10 253:11 | 502:17 504:12,13 | 379:20 392:22 | topic 93:3 95:7 |
| threonine 112:21 | 255:19 256:14 | 508:13 510:3,13 | 400:12 408:5 | 127:3,9 243:22 |
| 114:8 143:5 147:9 | 257:22 258:9 | 512:18 514:11 | 413:2 424:20 | 286:8 352:20 |
| 148:16 | 259:11 263:2 | 516:6 520:22 | 426:2,7 428:19 | 501:11 |
| thriving 389:13 | 271:21 272:14 | timely 14:16 17:6 | 441:21 442:13 | topics 9:11 42:20 |
| throat 504:20 | 274:2 278:21 | 33:3 300:3 | 465:20 466:9 | 436:3 |
| Thursday 32:5 | 280:20 281:6 | times 31:14 54:19 | 486:16 493:20 | total 9:16 67:5 |
| tide 60:11 | 285:7 286:12 | 75:7 135:6 161:21 | 498:11 501:4 | 188:11 189:13 |
| tight 194:5 286:12 | 291:12,20 292:9 | 162:14 181:13 | 511:4 | 219:14,21 385:10 |
| tilapia 47:10 64:14 | 293:9 294:18 | 255:5 266:13 | told 7:21 27:9 | 388:2 417:13 |
| 64:14 65:3,5,7 | 295:1 296:18 | 288:1 343:19 | 87:22 112:14 | 445:4 454:12 |
| 66:20 175:10 | 301:7 302:11 | 350:11 368:22 | 251:3 257:16 | 474:5 476:15 |
| tilapia-growing | 304:13 305:17,21 | 399:7 405:10 | 289:2 348:15 | totally 100:15 |
| 64:16 | 308:19,19 314:2 | 410:4 411:5 | 349:16 356:18 | 162:15 165:5 |
| tils 496:10 | 314:20 316:6,17 | 416:10 417:9,11 | 412:21 413:19 | 308:13 328:9 |
| Tilth 216:19 | 317:16 320:1 | 417:13 444:20 | 455:13 483:12 | 522:5 |
| 292:20 387:2 | 324:2 330:19 | 461:21 462:12 | tolerance 257:9 | touch 95:10 278:19 |
| 392:20 393:1,10 | 331:2 342:13 | timing 188:21 | 323:20 341:11,15 | 319:14 346:2 |
| 394:19 490:20 | 344:5,14,21 | 192:7 223:13 | 418:19 419:5,7,17 | touched 405:3 |
| 523:13 | 348:15 352:12,21 | 249:20 250:5 | 419:19,21 420:1,2 | tough 176:9 362:14 |
| Tilth's 493:21 | 354:22 362:19 | 303:22 341:4 | 420:7,11,15 | 436:21 |
| Tim 273:15 | 363:7 366:12,22 | 472:13 475:2 | 496:12 | tougher 253:11 |

| | | | | |
|---------------------------|----------------------------|-----------------------------|----------------------------|----------------------------|
| tour 65:8 467:16 | transition 10:12 | tree 5:21 6:3 218:5 | 277:6 303:22 | 140:1 158:12 |
| tours 106:10 | 43:20 295:8 299:7 | 218:16 219:17 | 366:12 401:13 | 168:9 179:20 |
| Tower 1:11 | 376:11 381:20 | 223:14 225:18 | 468:15,20 469:15 | 182:1 183:12 |
| town 27:14 34:11 | 445:22 471:14 | 227:2,3 228:4 | trick 362:12 | 232:1 260:21 |
| 518:6 | 478:16 | 244:5 249:3,6 | tried 92:17 97:20 | 271:12,13 275:4 |
| toxic 270:15 337:9 | transitioned | 260:8 262:16,19 | 138:17 175:5 | 278:7 286:12 |
| toxicity 333:10 | 360:16 | 300:5 321:7,9,13 | 288:6 347:22 | 346:16 358:9 |
| toxicological | transitioning 55:20 | 321:22 322:15 | 358:5 424:16 | 406:14 410:7 |
| 323:18 | 469:6 | 323:5 326:16 | 450:5 | 430:13 439:2 |
| toxicology 250:21 | translated 337:12 | 328:15 366:6,15 | trim 146:2 | 448:14 460:20 |
| 328:7 333:13 | translocation 417:4 | 368:11 369:12,14 | trip 76:12 | trying 7:13 33:7 |
| toxins 67:20,22 | transmitted 259:18 | 369:19,22 377:17 | triploid 61:2 | 51:17 128:4 129:9 |
| 359:14 | transparency | 377:18 381:10 | triploidy 61:3,8,10 | 132:21 135:12 |
| TR 330:3 334:11 | 14:13 16:12 27:20 | 382:11 385:20 | 66:17 | 139:4 142:13 |
| 338:22 | 28:10 37:11 370:8 | 388:17 389:4,11 | Tropical 229:3 | 177:17 179:4 |
| trace 96:11,16,20 | 497:22 499:8 | 390:6 394:10 | trouble 232:5 | 181:16 183:8 |
| 99:8 | transparent 17:15 | 397:17 407:7 | 257:14 469:22 | 200:22 205:9 |
| traceability 67:2 | 283:14 492:18 | 413:16 416:19 | 475:18 | 273:9 288:4 303:2 |
| 75:13 | transport 64:2 | 417:3 426:3 | trout 59:14,20 60:3 | 308:10,12 334:9 |
| track 250:16 | 76:11 | 441:21,22 463:13 | 60:5 | 355:12 357:20 |
| 461:12 475:3 | transporting 64:5 | 482:11 483:7,14 | truck 64:2,6 | 364:18 385:20 |
| Tracon 56:17 | transposable | 491:6 | true 46:18,18 55:17 | 416:9 419:17 |
| tract 237:8 259:20 | 232:17 | trees 164:20 214:21 | 56:1 97:5,10 | 440:22 442:20 |
| Tracy 1:18 41:22 | transposons 121:19 | 248:14 293:19 | 112:2 163:1 | 462:8 475:9,11 |
| 78:22 85:15 86:17 | Travel 11:15 | 360:22 362:2 | 277:19 302:13 | 518:16 |
| 107:14,15 116:5 | travels 399:14 | 392:11 394:5 | 340:14 409:10 | Tucker 36:4 |
| 133:7 146:7 | trays 55:12 | 399:12 400:12 | 442:7 471:17 | Tuesday 35:7 |
| 165:17 191:6 | treading 402:11 | 410:10 424:2 | 483:14,16 | Tulane 229:4 |
| 415:11 428:13 | treat 266:1,6,6,19 | 426:5 443:13 | truly 12:14 217:4 | tuned 11:15 |
| 474:11 | 501:22 502:5 | 459:15 463:6 | 300:1 301:6 441:1 | tunnels 518:17 |
| Tracy's 342:17 | treated 67:21 99:14 | 467:3 468:2 | 441:1 498:15 | turkey 187:2 |
| trade 382:10 | 99:17 137:22 | 475:19 476:5 | trumpet 6:2 | turn 7:1 9:6 107:15 |
| tradeoffs 86:13 | 214:15,21 409:11 | 477:1 479:4,9 | trust 45:21 162:8 | 108:1 159:14 |
| trade-wide 381:20 | 409:13 410:10 | 480:2 513:15 | 162:11,15,17 | 196:13 215:19 |
| traditional 136:2 | 411:5,6 415:19 | tree-fruit 4:15 | 385:11 386:8 | 238:16 315:15 |
| trail 274:12 | 446:5 484:13 | trellis 225:4 | 390:4 391:16 | 445:2 471:6 |
| trails 258:18 | 485:12 505:3 | tremendous 171:6 | 395:15 427:17,19 | turned 71:8 423:10 |
| trained 224:17 | treating 69:5 | tremendously 52:4 | 509:3 512:2 | turns 87:2 118:5 |
| training 227:5 | 410:14 502:7 | 71:9 380:21 | trusting 165:11 | 163:14 |
| 229:4 509:15 | 504:5 | trend 113:9 136:17 | trustworthy 508:17 | Twelve 342:19 |
| transcript 41:1 | treatment 72:19 | 136:21 139:17 | truth 368:11 444:6 | twist 318:10 |
| transfer 210:22 | 240:11 248:10 | trends 135:18 | 444:19 492:9 | two 8:20 9:15 10:21 |
| 212:19 237:12 | 263:4 270:12 | 396:16 | try 9:18 43:18 | 12:18 18:5 22:12 |
| 241:17 242:9 | 400:2,14 406:6 | trial 187:14 299:6,9 | 49:19 70:4 93:20 | 32:14 47:3 54:18 |
| 306:17 | 410:13 505:5 | trialed 290:7 | 97:12 118:17 | 62:19 105:9,22 |
| transferable 364:5 | treatments 265:19 | trialing 54:5 | 120:22 123:4 | 121:21 122:11 |
| transference 360:4 | 389:2 488:5 | trials 54:6 272:5 | 125:20 129:1 | 141:2 145:10 |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 153:21 154:7 156:15,16,18 163:4,15 169:17 178:17 182:20 189:22 190:21 199:10,13 203:1 210:14,21 214:20 232:11 236:17 246:13,17 248:13 258:10,11 266:12 276:6 284:8 309:20 310:9 311:13 337:16 338:22 343:22 344:5,5 347:21 366:11 384:13,16 403:1,9 421:10 454:10 460:9,14 462:5 469:17 470:19 471:18 475:14 496:2 518:12 two's 403:13 two-pound 190:13 type 88:14 90:18 185:21 203:18 256:16,16 263:4 292:6 318:10 328:16 331:5 334:14 396:22 397:2 411:12 489:7 types 56:11 149:8 153:21 170:1 176:2 298:19 323:7 327:4 329:8 329:14 334:17 335:4 typical 45:1 52:19 52:22 55:11 56:8 60:14 63:6 64:6 307:2 414:17 416:1 455:17 typically 85:20 414:13 417:15 423:15,16 484:3 | U | 411:11 445:5 446:1 452:15,17 473:13 483:22 493:7 494:18 501:17 516:19 understanding 93:20 94:17 118:20 123:6 150:14 257:15 267:4 277:10 390:2 393:19 413:4,11 492:3 understands 124:10 understated 367:12 understood 124:3 413:12 449:11 undertaken 265:20 underwater 53:3 57:16 under-dose 504:16 uneven 401:20 UNFI 293:4 453:6 453:6,14,15 454:9 454:21 456:19 unfolding 8:4 unfortunately 309:9 344:3 422:1 508:19 513:3 uniform 371:4 uniformity 114:6 uninformed 487:3 487:21 Union 297:2,11 432:2 500:17 unique 76:6 339:11 344:15 353:10 509:18 uniqueness 339:12 United 1:1 27:17 46:19 47:11 50:10 63:2,14 65:16 186:15 270:8 271:3 units 86:6 universities 138:7 156:16 179:18 | university 46:1,4,9 48:1 64:20 133:19 133:21 178:14 188:1,1 197:10 204:9,12 216:5 228:20 229:2,5,6 229:14 298:3 321:4 359:11 407:5 408:13 434:12 444:10 468:14 490:1 497:1 501:4 509:2 University's 230:21 unknown 236:10 unlawful 169:21 173:2,13,15,17 unmanageable 471:16 unnatural 87:15 unnecessarily 369:13 unnecessary 499:17 unorganic 170:4 172:16 unpredictable 250:9 488:9 unrealistic 24:5 unrecognized 240:22 unreplicable 508:22 unrestricted 442:13 452:16 unsustainable 170:3 173:16 uou 507:11 upcoming 224:7 update 10:22 11:1 11:6 224:2,3 updated 10:17 126:7 148:8,11 updates 7:19 10:20 148:13 310:20 updating 41:9 Udike 118:16 130:7 | upheavals 480:11 uphold 27:16 511:5 upper 442:1 444:17 459:12 upward 295:21 upwelling 61:15 up-tick 483:2 urge 23:21 395:11 478:14 urgency 306:2 394:15 urges 290:3 292:20 394:19 urging 31:17 490:4 Urvashi 500:18 USA 305:6,14 usage 245:18 319:11 327:20 366:6 496:11 USDA 13:18 46:22 47:6,8 78:7 103:1 103:19,19 131:4 156:18 222:20 229:19 332:17 487:9 use 6:5 12:4 19:10 21:14 23:8 34:13 50:16 56:14 68:2 68:13 71:11 72:9 73:9 74:4,5 75:5 82:18,20 88:7 91:6 93:19 95:3 95:22 98:15 103:19 110:1 115:12 116:17 117:1,20 120:5,13 150:10 152:2 157:13,15 159:10 179:11 180:16,18 181:11 185:11,20 191:13 196:20 199:1,21 203:2 205:7,11 213:1 218:22 219:5 220:5,7,13,15 222:10 225:22 227:13 235:19 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-------------------|---------------------------|---------------------------|----------------------------|----------------------------|
| 237:4 240:6 | 445:11 446:3,13 | 455:2 478:8,19 | 240:6 270:18 | vetted 285:17 |
| 241:11 247:18 | 450:19 451:3,5,10 | 481:19 482:1 | 367:19 369:21 | 414:21 |
| 249:11,13,14 | 452:16 453:7 | | 373:6 425:12,13 | viable 292:15 294:1 |
| 250:1 251:11 | 456:20 463:17 | V | 425:16,18,19 | 303:2 367:17 |
| 253:1 254:3 | 464:21 466:13 | vaccine 125:1,2 | various 78:10 | 389:7 443:14 |
| 258:12 260:13,21 | 471:15 481:10 | 180:3,4,5,16,19 | 147:8 195:15 | 444:5 455:15 |
| 262:3 264:6 | 486:14 487:12 | 180:19 | 259:4 292:18 | 494:1 |
| 269:12 270:8,10 | 488:12,15,22 | vaccines 71:5,8,10 | 334:6 460:22 | Vice 10:7 12:13 |
| 284:1,4 285:1,2 | 489:1,16 491:5,16 | 71:13 99:10,13 | 488:8 497:10 | 335:14 |
| 289:13 291:15 | 492:14 493:17,19 | 116:3,10,15,20,22 | Vasquez 507:11 | victim 488:9 |
| 294:8,15 295:20 | 495:20 496:20 | 117:2,12,16,20 | vast 325:18 | victory 300:21 |
| 297:4,18 298:5 | 498:2,19 499:4 | 118:1,6,20,22 | vector 119:14 | video 57:16 58:10 |
| 299:8,20 300:4,16 | 500:2 502:16 | 119:13,20 120:13 | 180:4,19 223:10 | view 56:20 57:5,9 |
| 301:1,14,18 303:1 | 503:6,8,9 504:4 | 121:11 124:10 | vectors 462:18 | 69:3,4,6 83:2 |
| 306:4 309:1,3 | 505:15 507:22 | 125:11,16 128:15 | 464:18 | 100:21 126:19 |
| 311:20 312:8 | 510:8,12,15 | 129:7 178:22 | vegetable 55:6 | 142:15,16 374:15 |
| 313:20 319:6,6 | 512:16 513:1 | 179:11,13 180:8,9 | 136:17 291:7 | 497:8 515:1,11 |
| 322:20 324:7,17 | 514:8 517:4,6 | 181:11 | 359:10 380:11 | viewed 58:20 270:3 |
| 327:4,7,10,17,22 | 521:10 | vacuum 128:2 | 425:8,8 428:22 | viewing 16:2 40:3 |
| 332:21 333:3 | useable 421:20 | Valley 186:12 | 490:16 | 376:17 |
| 338:10 339:1 | useful 35:17 42:21 | 398:14 400:4 | vegetables 298:9 | views 407:10,13 |
| 340:17 341:3 | 165:12 201:6 | 459:12 476:12,18 | 453:11 478:6 | 486:17 |
| 353:13 360:12 | 203:6,8 265:18 | 476:19 | 496:2 511:12 | vigilant 56:3 |
| 362:1,3,4,5 | 266:21 268:16 | valuable 13:22 | vegetarian 175:12 | vigor 399:2 |
| 363:10 364:16 | 501:22 | 130:11 334:22 | vehicles 24:2 | violation 420:9 |
| 366:15,18 368:11 | uses 59:8 100:19 | value 108:20 | venison 136:8 | violative 307:21 |
| 369:7,16 371:2,18 | 213:7 306:22 | 200:22 203:18,20 | venues 503:11 | 420:8 |
| 371:22 372:8,13 | 307:1 333:20,20 | 273:5,6 499:8 | verbally 10:5 | Virgin 64:21 |
| 372:18 375:5,8,13 | 341:14,18 408:10 | values 462:14 | verification 129:20 | Virginia 204:6 |
| 376:1,7 377:3 | 451:19 487:1 | van 197:21 | 227:13 | 247:16 |
| 378:8 381:9 383:9 | usual 320:9 | variability 112:15 | verify 81:8 84:21 | virtually 82:22 |
| 383:13 384:9,11 | usually 76:16 | 420:11,13,14 | 226:12,14 227:16 | 235:4 361:2 |
| 386:11 388:16 | 161:19,21 476:7 | variable 420:4,5 | Veritable 291:7 | virus 180:16 |
| 389:16 390:5,12 | utilize 108:19 | variables 87:3 | 380:11 | viruses 53:21 |
| 391:2,17,19 392:1 | 489:8 | variation 204:20 | Vermont 122:19 | vision 515:11 |
| 394:6,9 396:19 | utilized 223:9 | 228:13 437:21 | 346:6 | visit 106:8 159:6 |
| 403:19 406:16 | utilizes 218:14 | varies 228:9 | versus 85:18 86:10 | 162:14 508:3 |
| 408:9 411:13 | 307:13 | varieties 219:11 | 86:11 225:5 239:8 | visual 78:3 |
| 413:7 414:22 | UV 208:7 | 220:22 221:8 | 255:6 269:14 | vital 8:1 359:17 |
| 419:6 420:16 | U.S 59:13 103:14 | 223:10 228:6 | 299:5 364:21 | vitamins 78:19 |
| 421:7,8,14,15 | 103:18 104:3 | 353:2 361:22 | 385:18,21 519:22 | 99:3,6,7 115:9 |
| 422:13 425:5 | 249:13 282:7 | 372:14 374:5,6 | veterinarian 45:17 | 142:10 |
| 427:16 429:22,22 | 305:6 323:13 | 381:6 382:8 | 59:2 133:18 135:4 | vitro 336:5 |
| 431:12 433:8,18 | 344:12 368:13 | 425:14 462:13,16 | 178:10,12 | VivaTerra 398:19 |
| 434:13 439:8 | 374:7 380:4 382:9 | 488:3 498:4 | veterinary 45:18 | 478:3 |
| 442:6,10,13 | 398:17 409:11 | variety 219:18 | 68:22 69:4 118:14 | voices 495:12 |
| 443:20 444:7 | 421:15 453:17 | 223:16 232:17 | 119:19 179:19 | volume 396:6 |

| | | | | |
|----------------------------|--------------------------|---------------------------|---------------------------|--------------------------|
| volumes 369:19 | 50:3 64:12 66:20 | 266:5 269:17 | 438:11 440:15 | 453:2 456:8 477:8 |
| volunteers 24:6 | 74:16 76:8 87:14 | 362:9 375:8 400:1 | 460:19 481:12 | 485:15,16 497:3 |
| vote 18:1 29:8 32:4 | 92:12,15,22 95:7 | 477:12 | watched 373:2 | 505:12 516:18 |
| 32:11 36:15,19 | 96:19 99:19 | wanting 31:16 | 400:5,9 442:5 | ways 14:7 79:22 |
| 37:13 38:11 41:22 | 111:17 128:8 | 481:1 | Watch's 436:5 | 80:4 93:13 225:11 |
| 110:11 192:21 | 130:5 132:4 138:2 | wants 106:9 166:14 | 438:8 | 259:5 275:8 |
| 193:2 310:3,8 | 141:17 143:8 | 283:9 342:18 | water 5:12 59:16 | 403:12 414:20 |
| 312:11 315:6 | 149:20 151:16 | 425:20,21 | 59:21,22 60:13 | 460:16 |
| 317:19,21 318:2 | 155:5 160:5 | wards 502:2 | 61:16,19 64:9 | weather 189:6 |
| 320:16 395:9 | 162:17,22 163:2 | Warehouse 291:5 | 65:12 70:9 74:2 | 208:21 304:3 |
| voted 17:12 18:4 | 164:5 165:13 | 295:18 380:8 | 76:12 77:6 83:8 | 400:7 429:8 |
| 29:5,12 314:22 | 166:7 167:4 | warehouses 387:11 | 91:21 98:15 | 462:19 471:19 |
| 317:16 318:1 | 168:10 169:1 | warm 77:6 | 155:16 165:5 | 472:15 473:7 |
| voter 347:8 | 179:10 186:19 | warmer 276:9 | 166:18 168:19 | 508:21 |
| votes 29:2 39:3 | 190:18 194:5 | warranted 384:12 | 234:11 297:4 | Weave 6:6 |
| voting 37:8 115:18 | 195:8,12 205:13 | wash 208:10 | 338:12,13 429:18 | web 330:14,15 |
| 312:3 315:20 | 213:3 219:2,14 | washed 208:17 | 431:15 436:5 | webinar 197:19 |
| 320:17 | 220:3 222:15 | Washington | 438:8,11 440:15 | 198:5 247:11 |
| | 235:17 243:6 | 199:21 201:18 | 442:21 443:5 | 252:21 373:3 |
| W | 268:14 271:12 | 211:9 216:1,7 | waterfowl 63:10,13 | webinars 227:7 |
| wait 32:5 115:18 | 281:7,21 283:7,18 | 217:12 218:6,6,12 | waters 73:17 76:3 | website 19:22 |
| 245:20 373:14 | 289:5 305:6 306:1 | 228:8 248:9 249:4 | Wave 21:8 | 103:22 110:8 |
| 476:1,6,12 | 310:12 316:3 | 266:4 275:12,14 | waves 480:11 | 193:17 283:1 |
| waiting 25:11 | 319:1 327:10,20 | 282:5 303:9 | way 7:22 25:8 | 311:14 314:11 |
| 246:11 251:7 | 330:8 343:15 | 365:13 367:19 | 41:16 46:11 52:5 | 465:16 483:4 |
| 263:15 521:17 | 345:10,18 360:15 | 369:18 370:9 | 53:13 58:20 59:2 | Wednesday 1:7 |
| waking 5:3 | 374:6 375:15 | 373:21 377:5 | 59:5 60:20 61:10 | 35:8 |
| Waldo 31:13 | 384:14 406:14 | 378:1 379:7 387:3 | 65:5 67:6 68:20 | weed 220:9,16 |
| 378:11,13 | 407:14 414:13 | 387:13 401:18 | 70:12,15,18 80:8 | 488:18 |
| walk 476:2 | 425:9 426:6 | 407:5,6 411:4 | 85:5 91:16 108:19 | weeds 221:1 222:1 |
| walked 295:2 | 431:22 436:1 | 425:3 433:2 444:7 | 118:3,6 120:3 | 225:2 |
| Walker 1:23 9:7,8 | 438:13,15 439:15 | 446:11 486:2 | 132:11 137:16 | week 34:18 35:13 |
| 10:3 12:9 38:19 | 442:14 444:2 | 490:21 493:22 | 140:2 149:10 | 47:4 209:7 214:13 |
| 42:8 98:20 157:2 | 450:9 457:11 | 507:7 | 163:10 172:6 | 214:22 449:21 |
| 184:5 | 464:12 465:6,8 | Washington-based | 174:14 175:18 | 459:14,14 469:18 |
| walking 506:4 | 466:8,11,12 472:2 | 478:4 | 181:10 187:8 | 473:19 |
| walls 335:21,22 | 473:22 482:9 | Washington-gro... | 262:18,22 265:7 | weeks 26:1 121:18 |
| 336:1 | 491:9 493:9 495:3 | 367:20 | 277:4 278:10 | 155:1,3 157:21 |
| Walsh 214:9 | 501:13 511:5,17 | wasn't 9:20 100:2 | 280:20 288:15 | 160:1,12,19 161:1 |
| 507:13 510:21 | 513:17 520:14,18 | 296:18 | 299:15 303:1,2 | 161:2,4 188:13,16 |
| 511:1,2 514:16 | 523:10 | waste 73:14 165:4 | 306:18 308:1 | 248:13 258:10,11 |
| 515:13 517:15 | wanted 23:7 43:17 | 166:3,13,15 | 317:19 320:16 | 277:7 469:17 |
| 518:8,11,15 519:2 | 71:16 72:16 102:7 | 170:22 171:4,7 | 337:7 343:4 352:1 | 470:19 |
| 519:6 | 124:9 150:9,10 | 175:11 176:8,15 | 355:17 359:14 | week-long 342:22 |
| want 4:7,17 32:1,4 | 171:21 186:21 | wasted 58:1 | 365:4 401:4 404:7 | week-old 62:14 |
| 34:6 35:1,4 37:7 | 188:7 209:13 | watch 195:19 297:4 | 418:18 425:21 | weigh 497:20 |
| 40:15,22 41:14 | 248:6 262:12 | 429:18 431:15 | 435:3 449:5 452:9 | weight 67:5 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| welcome 23:2 105:19 149:10 196:17 467:17 510:21 | 126:11 131:2 135:2 145:15 192:20 193:7 194:6 195:4,18 196:8 197:4 286:12 313:4 315:18,20,22 405:11 423:3 448:14 461:14 522:9 | 281:19 284:12 286:11 303:16 307:3,5,10 308:10 309:6,8 316:1 323:4 324:6 325:14 326:9 327:16 334:19 342:5,6,7 343:3,3 376:12 397:16 398:3 401:9 403:15,18 405:21 406:18 410:14 432:7,15,16,19 435:14 436:2,3 439:14 453:19 454:1,5 461:3 474:9 475:11 483:19 486:11 490:7 506:10 510:9 514:22 517:16 | 409:16 410:16 417:10 421:10 434:5 435:8 442:5 450:22 457:19,22 462:11 469:21 476:16 483:3,9 484:6 506:3 whatsoever 104:13 336:6,9 what-not 436:9 Whelan 507:12 white 21:8 347:14 whittled 101:3 Whoa 500:5 wholesale 379:22 380:3 387:8 wholesalers 291:5 379:21 387:9 454:2 482:21 wholly 379:18 wide 219:18 223:15 442:9 476:10 491:2 widely 202:14 225:17 228:9 446:20 447:1,3 widely-used 226:7 widespread 203:2 258:17 wife 60:7 141:1 459:11 477:19 495:22 505:2 wild 54:1 74:16 75:9 81:12 101:9 168:20,21 169:15 170:6,20 174:11 174:14 175:12 180:10 wilderness 6:10 Williams 158:19 willing 106:11 296:5 317:18 385:19 Willy 158:19 window 257:22 winds 429:8 windstorms 480:10 | wine 284:22 winter 5:13 159:12 186:6,7 405:10 wiped 399:22 477:8 Wisconsin 60:4 211:11 213:18 303:12 441:20 446:19 wise 452:16 wish 132:16 369:19 Withey 487:2 withhold 72:18 withstand 73:12 172:13 witnessing 496:15 Wittenberg 48:6 wolf 21:16,18 337:14 Wolfe 21:6 wondering 94:13 176:10 177:5 254:10 275:3,3 515:5 wood 119:14 399:4 word 8:7 37:2 81:19 93:19 95:3 117:2 120:5 147:5 156:10 274:8 432:17 words 61:15 233:13 354:14 460:14 461:20 work 4:5 5:8 14:18 15:15 18:19 20:2 21:4 35:19 39:16 42:15 43:21 47:17 48:18 49:8 50:22 72:10 78:8,17 80:16 88:17 91:1 94:12 105:22 106:3,5 116:8 119:2 120:22 121:8,15 123:4,15 126:4,6,9,15 130:21,22 137:9 155:12 161:18 167:17 178:15 |
| welfare 100:8 154:5,17 157:5 158:17 159:9 183:13,19 184:1 | | | | |
| well-established 99:7 | | | | |
| well-informed 227:20 | we're 6:21 7:13,17 8:5,11 12:22 33:6 34:17 35:4,7 36:6 36:11 37:18 42:20 43:2,4 49:14,19 50:10 54:5 59:10 68:16 80:5,20 81:6,11 82:16 88:6,12 90:3 93:2 93:5,16 98:5 102:2,13 104:6 107:1,8,9 118:3 125:3 129:9 131:15 135:12,18 136:1,5 137:16 152:14 164:21 165:11 167:17 171:13 173:12 175:22 176:1 177:7,15 181:7,10 181:16 182:8 189:5,15 190:12 191:18 192:7 193:1 195:10 196:4,6 198:20 199:22 203:21 211:14 212:4 213:9 218:8 224:8 226:10 234:1 235:15 243:1 246:11 251:6 257:15 260:6,20 264:1,22 265:14 265:17 266:4,19 269:19 271:2 272:11 274:4 277:11 278:9,10 | | | |
| well-known 377:14 | | | | |
| well-settled 172:4 | | | | |
| well-tested 225:16 | | | | |
| Wenatchee 248:13 273:15 407:5 | | | | |
| Wendy 1:19 9:18 159:1,4 | | | | |
| went 11:4 47:18 64:1 69:14 100:4 107:6 119:3 120:18 121:18 188:14 194:19 198:7 281:5 288:12 342:11 392:5 399:19 416:10 417:18 450:6 470:19 473:5 516:21 523:22 | | we've 4:11 5:2 11:12 32:18 49:10 54:7,13,13 77:18 98:7 99:19 102:21 107:19 115:19 118:10,12 127:21 128:10,12 132:20 141:18 152:7 168:6 172:3 173:9 174:17 187:10,12 187:19 188:13 193:6 195:13,15 196:22 199:9,13 200:3 211:7 213:16 214:17 232:4 240:2 248:17 251:16 263:13 264:11 267:2,6,15 268:1 268:6 272:17 274:11 280:21 285:12 287:13 302:20 326:11 334:4,18 356:13 380:20 396:1,4 404:8 406:12 | | |
| weren't 22:16 89:2 89:4 149:13 349:16 474:8 483:5 | | | | |
| west 61:5 62:17 276:8 277:13 359:6 361:2,9 398:21 496:20 519:8 | | | | |
| Western 361:5 | | | | |
| wet 476:5 | | | | |
| wetter 189:20 | | | | |
| we'll 4:4,5,10,12,20 5:4 12:19 36:18 38:11 41:22 103:8 104:13 107:1 | | | | |

| | | | | |
|-------------------------|-------------------------|---------------------------|---------------------------|--------------------------|
| 179:22 190:18 | 293:21 323:4 | 461:6 462:9 | WSDA 217:20 | 331:18,21 332:2,4 |
| 197:18 205:17,18 | 480:3 513:14,18 | 471:20 | 218:15,19 223:5 | 366:17,22 387:21 |
| 208:2 209:21 | working 3:13 8:2 | world's 46:12 | 226:21 387:3,10 | 399:6,6,10 400:6 |
| 211:6,11,17 | 43:6,12 44:13,16 | 501:6 | 486:17 487:2 | 401:3 406:18 |
| 214:10,17 217:5 | 45:11 48:13,16 | world-recognized | WSDA's 216:17 | 409:12 425:15 |
| 224:18 225:15 | 56:17 69:14 78:5 | 69:13 | 368:15 | 430:19 441:9 |
| 228:2 230:10 | 78:9,17 88:1 | worm 6:1 | <hr/> X <hr/> | 443:8 446:6 448:6 |
| 242:22 248:17,21 | 89:10 91:1,6 | worms 86:2 337:13 | X 504:20 505:2,6,7 | 451:5 455:18 |
| 257:5 261:9 263:6 | 92:13 93:8 94:7 | worried 349:14 | X's 505:7 | 464:22 468:2 |
| 264:14 267:16 | 94:11 96:6 97:8 | worries 34:19 | <hr/> Y <hr/> | 470:9,14,17,17 |
| 268:3 275:2,13 | 97:20 102:13 | worry 277:14,21 | yeah 7:7 22:6 33:2 | 471:4,18 472:17 |
| 281:8 283:19 | 106:1,4 108:12 | 345:18 349:12 | 35:21 90:19 91:17 | 472:19 475:9,11 |
| 284:20 294:4 | 111:2 118:11,13 | 392:10 403:22 | 102:7 109:4,8,9 | 476:19 481:6,7 |
| 299:6 302:9 303:6 | 119:2,6 120:10 | worse 184:18,20,21 | 139:16 146:12,17 | 502:17 508:20 |
| 303:11 307:9 | 123:2,11 126:13 | 307:22 351:13 | 147:2 164:22 | 509:3 514:7 518:2 |
| 316:3 321:11,14 | 127:7,21 130:12 | worst 80:10 307:1 | 165:9 166:15 | yearly 10:17 |
| 330:11 350:12,19 | 132:7,13,18 156:5 | worth 201:12 | 191:15 246:20 | years 27:15 43:14 |
| 354:6 357:14 | 156:18 181:14 | 343:16 | 250:7 251:12,15 | 43:15 44:21 46:15 |
| 365:8 372:17 | 182:1,10 244:3 | worthless 82:2 | 253:18 255:7 | 46:15 50:18 52:4 |
| 382:13 391:6 | 264:22 268:6 | worthwhile 41:6 | 256:9 257:4 263:5 | 54:4 58:19 60:3 |
| 401:18 402:19 | 271:17 357:6 | 305:1 | 266:2,17 279:20 | 63:5 68:4 69:2,8 |
| 404:9 407:7,14 | 367:4 387:1 | worthy 522:7 | 280:6 281:16 | 71:11 77:6 83:10 |
| 413:16 414:15 | 398:15 402:19 | wouldn't 47:17 | 284:8 328:22 | 84:20 86:18 95:4 |
| 421:16 422:2 | 426:9 443:9 452:9 | 215:8 275:13 | 340:9 358:8 | 95:6 96:12 99:12 |
| 424:20 426:2 | 484:15 492:6 | 397:10 423:18 | 378:16,16 385:3 | 121:5 133:22,22 |
| 429:17 437:16 | 495:5 | 450:22 451:10 | 397:12 404:22 | 134:20 156:4,5,12 |
| 438:2 444:8,11 | works 181:15 | 518:20 | 411:1 424:7,18 | 170:12 178:10,12 |
| 450:4 453:6 459:5 | 248:2,11,18 | wounds 424:5 | 426:8 451:6 | 198:16,19 203:1 |
| 480:6 486:1 493:2 | 264:20 303:9 | wow 396:2 521:1 | 472:20 476:21 | 211:20 213:20 |
| 493:10 494:8,17 | 318:15,16 319:20 | wrap 49:21 422:22 | 477:21 518:11 | 230:14 234:5 |
| 500:18 501:9 | 329:16 351:1 | wraps 22:7 | 522:21 | 237:2 245:21 |
| 509:1 518:6 | 406:14 407:11 | wrestle 280:18 | year 11:1,21 15:15 | 253:14 265:14 |
| workable 380:17 | 472:16 475:3 | write 89:4 344:15 | 23:13,17 46:22 | 267:3 275:1 |
| 382:18 | 482:11 | 387:5 414:13 | 52:8 73:12 74:9 | 303:21 317:14 |
| worked 22:8 31:6 | workshops 516:22 | writing 19:15 | 75:7 81:17 134:15 | 318:6 323:10 |
| 43:14 51:11 97:12 | Work's 211:8 | 254:5 358:4 | 142:8 162:14 | 343:22 344:5,6 |
| 128:10 131:3 | world 5:10 46:18 | 450:15 | 171:4 190:6 | 350:19 365:16 |
| 211:10 229:18 | 57:2 59:8 64:15 | written 8:16 9:21 | 197:20 198:12 | 366:11 371:8 |
| 244:12 266:2 | 67:18 70:13,17 | 12:17 67:7 112:13 | 199:16,19,19 | 372:12 373:6 |
| 272:17 275:17 | 71:13 82:1 102:1 | 113:17 114:12 | 200:2 202:6,6,8 | 377:15 379:16 |
| 300:22 301:9 | 187:21 188:6 | 144:13 147:18 | 203:1 217:16 | 381:19 382:10 |
| 343:4 350:10 | 205:16 206:16 | 152:8 284:17 | 219:5 224:7 228:9 | 384:14,16 385:1 |
| 356:14 398:17 | 240:5 269:17 | 290:13 302:21 | 228:10 252:9,18 | 387:1,4 388:4 |
| 453:9 455:9 473:6 | 270:3 299:11 | 305:19 340:22 | 268:9 275:21 | 389:6 396:3 |
| 478:8 | 309:9 350:22 | 444:1 | 298:6 302:14 | 398:15,18 399:9 |
| worker 323:3 | 387:16,18 393:15 | written-out 520:11 | 319:9 323:20 | 399:19 400:4,8,11 |
| workers 242:11 | 410:6 460:15 | wrote 93:14 | | 402:7,22 403:9 |

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 407:20 425:3,15 447:7,9,17,17 453:10 455:20 461:5 468:4,19 469:4 471:1,9,13 472:14 474:1 475:8,14 478:4 479:16 480:6 483:4 508:18 year's 446:7 454:14 480:9,14 year-old 400:10 year-over-year 454:16 year-round 14:22 15:21 17:2,13,19 39:16,21 517:21 yeast 199:14 203:6 203:17 276:19,22 277:2 278:13 470:11 473:9 yeast-based 469:22 yell 298:22 yellow 22:18 141:8 171:20 316:16 Yep 137:7 yeses 290:12 yesterday 9:13 21:4 22:17 129:18 281:6 342:20 432:1 yes's 289:19 yolk 55:15 York 303:12 359:6 359:8 500:22 young 62:19 114:1 156:1,6 182:20 362:2 y'all 98:20 167:4 205:3 280:16 281:12 | Zea's 126:9 286:6 zero 187:16 188:4 329:18 336:8 411:9 419:7,7,17 419:17,20 420:1 423:9 472:22 zinc 90:4 137:12 309:21 310:18 311:2,19 312:7 318:13 331:12,16 332:8,10,22 333:2 333:4,7,12,14,17 333:22 335:20 336:8,12 338:7,12 339:16 340:6 zip 344:13 zone 27:13 74:21 zones 75:19 | 100 69:2 73:12 158:11 172:2 173:6 248:20 376:13 439:10 441:10 455:5 100,000 182:17 107 3:15 11 302:9 410:3 416:10 417:9,12 417:13 11th 33:5 43:7,8 282:3 11:29 194:19 11:30 194:4 12 45:13 60:3 68:4 78:8 106:22 157:20 161:2,4 282:12 289:14 302:6 342:7 361:13 400:10 455:20 12:45 194:15 12:48 106:22 12:50 194:20 195:2 120 398:11 13 39:17 109:21 365:16 133 3:17 133324 315:4 136 218:22 14 215:1 15 69:8 71:11 83:10 86:11 187:1,2 194:7 372:12 496:1 517:15 15th 262:8 15,000 187:15 150 63:7 399:20 416:16 16 288:1 425:2 471:1 475:8 17 155:3 160:1,19 161:1 18 155:3 157:21 160:11 161:4 18th 331:21 18,000 187:4 | 180 50:4 169:16 1900 468:3 1930's 371:11 1940's 501:22 1945 504:7 1950's 393:22 196 3:20 1969 121:14 1972 520:7 1973 520:7 1974 148:11 1975 121:15 1978 150:2 1979 490:17 1980 490:18 1980's 350:11 1982 473:18 475:18 1985 496:3 1988 359:8 1995 301:22 343:14 343:17 377:9 446:12 1996 216:14 398:10 468:14 1999 47:15 197:8 | 2005 45:12 48:14 168:7 229:15 230:6 254:6 317:13 2006 48:19 148:9 282:20 398:10 2006-2007 169:3 2007 49:1 169:7 187:11 229:12,16 2008 49:6 141:19 411:20 430:15,18 2009 313:15 2010 10:22 46:22 49:10 218:19 317:13 487:16 2011 275:17,19 282:19 287:5 295:2 313:17 314:7 381:2 384:17 407:8 411:20 469:10 470:3 2012 25:2 26:9 109:20 110:6 154:8 188:15 219:5 275:19 282:3 293:11 310:19 311:11 313:12 331:18 380:2 470:6 478:8 2013 1:8 25:4 26:11 37:18,22 217:15 272:8 303:16 509:5 2014 202:8 260:11 272:2,8,9,12 282:14 289:11 296:15 299:3,4 366:11,16 370:22 382:1 385:22 412:8,18 413:9 445:9 447:20 481:18 505:19 2015 202:12 272:14 414:1,11 2016 287:12 289:16 290:4 292:8 |
| <hr/> Z <hr/> Zea 1:21 87:16 121:3 173:18 281:18 298:21 355:3,7 434:20 | <hr/> \$ <hr/> \$16 293:12 454:15 \$2.50 163:5 \$20,000 455:18 \$550 380:2 \$6.00 163:5 | <hr/> 0 <hr/> 0 290:12 312:4 315:2,7 013 257:3 07 10:21 08 10:21 09 10:21 | <hr/> 2 <hr/> 2 15:17 39:17 154:3 154:4 2,000 303:15 400:11 2,500 393:1 2.7 161:6 2.8 161:5 2.95 161:1 20 69:8 86:20 87:3 168:5 297:11 318:6 398:17 400:10 475:19 478:4 200 63:7 75:8 187:3 210:13 230:17 443:2 2000 176:15 229:11 2002 216:8 468:5 2003 48:11 2004 48:11 150:1 | <hr/> 1 <hr/> 1 290:12 312:9 1st 154:8 188:14 465:1,2 1,000 399:15 404:11 512:6 1,100 219:21 1,500 187:4 1/2 514:14 10 1:8 71:11 86:21 262:7 372:11 455:20 10:00 107:2,4 10:06 107:7 |

| | | | |
|---------------------------|----------------------------|--------------------------|----------------------------|
| 305:10 352:11 | 198:16 254:22 | 36 64:11 74:10 | 6518(n) 18:20 |
| 355:20 363:17,21 | 256:12 330:4 | 75:15 453:10 | 66 381:4 |
| 366:3 369:7 | 461:5 | 518:18 | 68 234:19 |
| 383:20 385:18,18 | 25th 217:16 | 361 218:20 | 69 388:3 |
| 414:2 425:6 491:6 | 250 34:2 255:4 | 39 239:5 | <hr/> |
| 521:5,16 | 262:4 | <hr/> | 7 |
| 2017 291:17 293:8 | 26 235:1 | 4 | 7 3:8 290:12 330:4 |
| 294:16 299:14 | 27 15:7 39:8 188:13 | 4 312:9 | 7,000 293:4 440:12 |
| 366:19 383:20 | 290:17 | 4th 310:19 331:17 | 453:21 |
| 388:18 390:6 | 27,000 293:5 | 332:7 | 70's 371:14 |
| 426:8 456:21 | 453:21 | 4,200 518:11 | 70-week 188:22 |
| 2017-2018 522:4 | 273 465:15 | 40 46:15 210:1 | 700 374:19 |
| 2023 299:15 | 28 178:12 | 235:11 287:21 | 719 218:20 |
| 205.200 222:21 | 28,581 344:10 | 288:4 381:3 | 72 374:22 |
| 205.203 76:2 | 281 290:20 | 40,000 440:11 | 72,000 387:21 |
| 205.206 220:8 | <hr/> | 400 400:5 | 73 333:19 |
| 221:9 354:8 395:6 | 3 | 44 3:13 147:7 | 736 219:20 |
| 205.206(e) 221:19 | 3 312:9 315:6 | 45 215:1 219:10 | 76 219:6,9 |
| 205.402 224:13 | 3rd 108:14 | 522:20,21 | 77 234:17 |
| 205.403 226:10 | 3,000 478:9 | 49 409:22 416:13 | 79 381:5 |
| 205.406 224:13 | 3:15 281:10 | <hr/> | 8 |
| 205.600 117:6 | 3:23 342:11 | 5 | 8 19:11 312:4 |
| 205.601 221:21 | 3:35 342:8 | 5 315:7 410:3 | 313:12 315:2 |
| 222:3 282:9 | 3:36 342:12 | 514:13 | 8-1/2 388:1 |
| 289:12 311:2,21 | 30 25:18 27:1 46:15 | 5,000 255:5 | 8:00 1:10 |
| 312:7 313:19 | 86:20 99:12 101:1 | 5,897 344:14 | 8:01 4:2 |
| 205.603 109:22 | 237:1 280:21 | 5:30 196:5 | 80 144:6 237:7 |
| 205.672 521:8 | 281:8 318:7 | 5:40 196:6 | 470:18 |
| 206 356:10 | 379:16 476:14 | 50 156:4 159:15 | 80's 151:2,5 371:14 |
| 21 454:17 | 491:17 | 336:20 453:18 | 84 230:19 |
| 21st 282:14 286:16 | 30th 109:20 | 50-member 518:2 | <hr/> |
| 287:11 289:11,16 | 30,000 344:7 | 500 9:16 | 9 |
| 355:20 366:3,16 | 300 33:22 494:21 | 56 372:6 | 9 176:17,18 |
| 369:7 | 495:10 | 59 156:5 | 9.8 478:11 |
| 21,000 387:22 | 317 3:22 | <hr/> | 9:48 106:22 107:6 |
| 22 3:11 25:5,18 | 32 178:10 330:14 | 6 | 90 86:9 210:2 |
| 239:8 454:11 | 375:1 | 6 15:6 39:7 | 486:10 |
| 22nd 18:3 332:4 | 32-day 331:2 | 6th 1:11 332:1 | 90's 138:16 371:14 |
| 23 387:1 | 32.5 330:4 | 6,000 347:16 | 92 361:13 |
| 24 188:15 218:2 | 320 290:14 | 6,544 291:1 | 921 1:11 |
| 372:9 408:18 | 33 137:7 468:4 | 6:25 523:22 | 94 229:18 |
| 24,016 290:22 | 333 219:7 | 60 211:20 235:2,6 | 96 229:18 487:16 |
| 24,545 291:2 | 34 219:9 | 410:1 | |
| 25 25:2 48:7 68:3 | 35 60:17 254:17 | 601 315:5 488:12 | |
| 73:13 79:13 80:5 | 255:2 257:9 | 61 218:9 409:22 | |
| 81:2 86:10 168:2 | 290:16 398:15 | 416:13 | |
| 173:11 189:13 | 350 176:14 | 65 218:8 | |
| | | 65,000 453:22 | |

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This is to certify that the foregoing transcript

In the matter of: National Organic Standards Board

Before: USDA

Date: 04-10-13

Place: Portland, Oregon

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

+ + + + +

MEETING OF THE NATIONAL ORGANIC
STANDARDS BOARD (NOSB)

+ + + + +

THURSDAY

APRIL 11, 2013

+ + + + +

The National Organic Standards
Board convened at 8:00 a.m. at the Hilton
Portland & Executive Tower, 921 Southwest 6th

Avenue, Portland, Oregon, Mac Stone,
Chairperson, presiding.

MEMBERS PRESENT

- MAC STONE, Chairperson
- HAROLD AUSTIN
- CARMELA BECK
- COLEHOUR BONDERA
- JOSEPH DICKSON
- TRACY FAVRE
- JAY FELDMAN
- JOHN FOSTER
- WENDY FULWIDER
- NICHOLAS MARAVELL
- JEAN RICHARDSON
- ZEA SONNABEND
- JENNIFER TAYLOR
- FRANCIS THICKE
- CALVIN WALKER

STAFF PRESENT

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National Organic Program

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Organic Program

T-A-B-L-E O-F C-O-N-T-E-N-T-S

| | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| Call to Order | .5 |
| Handling Subcommittee: Presentation of Subcommittee Proposals and Summarization of Written Comments John Foster, Chairperson | .7 |
| Public Comments related to Handling Subcommittee Luis Monge | 37 |
| Theresa Frakes | 41 |
| Sherry Sirkin. | 45 |
| Charlotte Uris | 50 |
| Goldie Caughlan. | 59 |
| Charlotte Vallaeyes | 69 |
| Allyson Kelly. | 88 |
| Troy Aykan | 92 |
| Zareb Herman | 95 |
| Trace Tipton | 98 |
| Lindsay Fernandez-Salvadore. | .101 |
| Discussion and Vote | .106 |
| Compliance, Accreditation and Certification Subcommittee: Presentation of Subcommittee Proposals and Summarization of Written Comments Joe Dickson, Chairperson | .169 |
| Public Comments related to Compliance, Accreditation and Certification Subcommittee Mary Mann. | .192 |
| Inerts Working Group Update Lisa Brines. | .205 |
| Deferred Proposals/Final Votes Pet food amino acids | .218 |
| Polyoxin d zinc salt | .229 |
| Indole-3-butyric acid. | .246 |
| Other ingredients. | .251 |
| Tetracycline | .271 |

T-A-B-L-E O-F C-O-N-T-E-N-T-S (Continued)

Subcommittee Workplans.368

Other Business and Closing Remarks.390

Adjournment393

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
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21
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P-R-O-C-E-E-D-I-N-G-S

8:02 a.m.

CHAIRMAN STONE: I'm going to call the meeting back into session. Again, everyone's quite familiar, we have a lot to consider today, several topics that we've not brought up yet.

First, I'd like to start out, each of us that are appointed by Secretary Vilsack would like to give Francis a little something that he can prove to his friends that he actually is on this.

So, Francis, if you'll come up here?

(Whereupon, a presentation was made to Member Thicke.)

MEMBER THICKE: Thank you very much.

CHAIRMAN STONE: Thank you, Francis. I guess now you realize the gravity of your agreement to serve.

So at this time I ask Jean to read

1 from "The Unsettling of America," Wendell
2 Berry, this morning.

3 MEMBER RICHARDSON: "The concept
4 of country, homeland, dwelling place becomes
5 simplified as the environment; that is, what
6 surrounds us. Once we see our place, our part
7 in the world as surrounding us, we have
8 already made a profound division between it
9 and ourselves. We've given up the
10 understanding, dropping it out of our language
11 and so out of our thought, that we and our
12 country create one another, depend on one
13 another, are literally part of one another,
14 that our land passes in and out of our bodies
15 just as our bodies pass in and out of the
16 land. That is, we and our land are part of
17 one another so all who are living as neighbors
18 here, human and plant and animal, are part of
19 one another and so cannot possibly flourish
20 alone, that therefore our culture must be our
21 response to our place. Our culture and our
22 place are images of each other and inseparable

1 from each other and so neither can be better
2 than the other."

3 CHAIRMAN STONE: Thank you, Jean.
4 So anybody else, any tidbits or anything from
5 the Program to start?

6 Okay. Very good. Okay. We'll
7 jump right in. We're going to do Handling
8 Subcommittee first thing this morning before
9 a break. Then we'll have CACS before lunch.
10 Then after lunch will be the voting session
11 for all the topics that we have pushed off
12 until today.

13 So with no further ado, I'll turn
14 the program over to Mr. Foster.

15 MEMBER FOSTER: Thank you. We
16 have four substances and one document to be
17 voting on today. We have sulfuric acid,
18 barley beta fiber, sugar beet fiber, DBDMH and
19 the auxiliary or other ingredients document.

20 My hope is that we can, after we
21 hear public comment, vote on the four
22 materials, and my guess is that we'll hold off

1 voting on the other ingredients document until
2 after lunch probably. But otherwise, I think
3 we're ready to go on sulfuric acid.

4 And Dr. Brines, if you'd be so
5 kind as to introduce it?

6 DR. BRINES: Thank you, John. The
7 first petition on the agenda is sulfuric acid.
8 The substance was petitioned on July 29th,
9 2010 by a company called Marinova. The
10 petition requests the addition of sulfuric
11 acid to Section 205.605 of the National List
12 for use in organic handling. The substance
13 does not appear elsewhere on the National List
14 for handling.

15 In support of its review the
16 Handling Subcommittee requested the
17 development of a third party technical
18 evaluation report. That report was completed
19 in 2012 and both the report and the petition
20 were posted on the NOP Web site in advance of
21 the opening of the public comment period for
22 this meeting. Thank you.

1 MEMBER FOSTER: Thank you very
2 much for that. As before, I'm going to ask
3 the folks who headed up the discussions on
4 each of the items to introduce them and carry
5 the discussion forward if necessary.

6 So, Joe Dickson, I think you're
7 up.

8 MEMBER DICKSON: Thank you, Mr.
9 Foster. The Handling Committee reviewed the
10 petition for sulfuric acid and the technical
11 evaluation report. We found that sulfuric
12 acid, which is used as a pH adjuster in the
13 extraction of seaweed extracts, did not meet
14 the review criteria for a number of reasons.

15 First of all, the petition itself
16 had large swaths of confidential business
17 information redacted, which made it very
18 difficult to really understand the process by
19 which the extraction of the seaweed takes
20 place. It was impossible to determine whether
21 the resulting extract was a synthetic material
22 and it really just left a lot of details out.

1 The essentiality of the substance was not
2 demonstrated in the petition and the technical
3 report documented negative environmental
4 impact of the production of the substance very
5 clearly.

6 We received several public
7 comments regarding this material. Marinova,
8 the petitioner, did provide some additional
9 information that did address some parts of
10 what had been redacted from the petition, but
11 did not fundamentally change the standing of
12 the substance with regard to the review
13 criteria.

14 Richard Theur noted that if we are
15 going to ever have organic citric acid, this
16 material will need to be added to the List,
17 which may well be the case, but isn't germane
18 to this particular use.

19 Beyond Pesticides, PCC, NOC, Wild
20 Farm Alliance all commented against this
21 material and we did not hear from any
22 potential downstream users of the ingredient

1 in any product.

2 Any questions?

3 MEMBER FOSTER: Yes, if we could
4 kind of have clarifying questions now, that
5 would be great. And then I anticipate having
6 discussion after we hear public comment on the
7 subjects. But clarifying questions at the
8 moment?

9 All right. Thank you, Joe.

10 Moving onto barley beta fiber next
11 on the docket. And Dr. Brines, would you be
12 so kind?

13 DR. BRINES: Thank you, John. The
14 petition for barley beta fiber was submitted
15 by Cargill on September 17th, 2009. There was
16 one update to the petition on June 1st, 2011,
17 and that update was in response to additional
18 questions from the Handling Committee. The
19 petition requests the addition of barley beta
20 fiber to Section 205.606 of the National List
21 for use in organic handling and barley beta
22 fiber does not appear elsewhere on the

1 National List.

2 In support of its review the
3 Handling Subcommittee requested the
4 development of a third party technical
5 evaluation report, and that report was
6 completed in 2012. Both the report and the
7 petition were available to the public on the
8 NOP Web site in advance of the opening of the
9 public comment period for this meeting.

10 Thanks.

11 MR. FOSTER: Thank you. So this
12 material was petitioned to be put on 205.606
13 as an allowed non-organic ingredient. I won't
14 go through the whole summary, but it's intent
15 was as a nutritional supplement to add to
16 dietary fiber. The reported unique qualities
17 of this were a preferable balance between
18 soluble and insoluble fiber, and the variety
19 of barley from which this is derived is -- in
20 the petition was identified as a unique
21 variety not available in an organic form.

22 A review of what we could find in

1 the commercial stream confirmed that. In
2 general, we identified that the evaluation
3 criteria -- impact on humans and environment,
4 we felt that that criteria was met. On
5 essentiality and availability, in part because
6 essentiality and availability are linked in a
7 single criteria, the answer is actually yes
8 and no. And then compatibility consistency,
9 we felt on the whole it did meet that
10 criteria. And again it seemed to meet the
11 commercial supply criteria.

12 We confirmed through the
13 classification motion unanimously that it was
14 agricultural as petitioned, and on the listing
15 motion the Handling Subcommittee voted seven
16 yes and one abstention to list it on the
17 National List.

18 Any clarifying questions at the
19 moment on that?

20 Okay. Hearing none, I'd like to
21 move onto sugar beet fiber.

22 Dr. Brines, would you be so kind?

1 DR. BRINES: Thank you, John. The
2 petition for sugar beet fiber was submitted by
3 Nordic Sugar on September 30th, 2009. The
4 petition was revised February 7th, 2011 in
5 response to additional questions from the
6 Handling Subcommittee. The petition requests
7 the addition of sugar beet fiber to Section
8 205.606 of the National List as an
9 agricultural product, and sugar beet fiber
10 does not appear elsewhere on the National
11 List.

12 In support of its review, the
13 Handling Subcommittee requested the
14 development of a third party technical
15 evaluation report, and that report was
16 completed in 2012. Both the report and the
17 petition were available on the NOP Web site in
18 advance of the opening of the public comment
19 period for this meeting. Thank you.

20 MEMBER FOSTER: Thank you. Like
21 the barley beta fiber, the intent was to add
22 this as a dietary supplement to increase the

1 fiber content of materials. It's a byproduct
2 of the sugar manufacturing process. The
3 primary concerns that we discussed were the
4 manufacturing of sugar and its impact on the
5 environment. The majority of the discussion
6 focused around the likelihood of genetically
7 engineered sugar beets getting into the supply
8 chain in some way. We had a fair amount of
9 discussion on that again summarized in the
10 proposal.

11 In general we felt the criteria
12 for evaluation criteria were met and we
13 confirmed through vote to classify this as
14 agricultural and the listing motion again on
15 205.606 were seven yes and one abstention.

16 Are there any clarifying questions
17 at the moment?

18 All right. Moving onto the last
19 of the substances up for vote this meeting,
20 DBDMH. I'll try once -- actually no, Dr.
21 Brines, would you be so kind to just pronounce
22 this correctly as you introduce the material?

1 DR. BRINES: Sure. For the
2 record, the petitioned substance is 1,3-
3 Dibromo-5,5-Dimethylhydantoin, henceforth
4 known as DBDMH.

5 The petition was received on
6 February 9th, 2012 and was submitted by
7 Alvamaro Corporation and the petition requests
8 the addition of the substance to Section
9 205.605 of the National List as an anti-
10 microbial. It is not currently listed
11 elsewhere on the National List.

12 In support of its review the
13 Handling Subcommittee did request the
14 development of a third party technical
15 evaluation report. That report was completed
16 in 2012 and both the petition and the
17 technical report were posted on the NOP Web
18 site in advance of the opening of the public
19 comment period for this meeting. Thank you.

20 MEMBER FOSTER: Thank you. The
21 material DBDMH is widely used as a
22 disinfectant in the rest of the world, in

1 drinking water, recreational water treatment,
2 bleaching agent in paper and pulp
3 manufacturing. It was petitioned here as an
4 antimicrobial treatment for beef carcasses and
5 beef parts. As Dr. Brine said, not recognized
6 by other programs.

7 The Committee on the whole felt
8 that none of the evaluation criteria were met.
9 We classified this as synthetic seven yes and
10 one was absent. And on the listing motion to
11 add this to 205.605(b) the vote was seven no
12 and one absent.

13 Are there any clarifying questions
14 at the moment?

15 All right. Thank you. That's the
16 last of the substances up for a vote. We have
17 one more item on our agenda, and that is the
18 auxiliary or other ingredients document. And
19 I would ask Zea who headed up the discussion,
20 the robust discussion on this to take it from
21 here.

22 MEMBER SONNABEND: Thank you,

1 John. Well, Michelle is going to pull up or
2 slides on other ingredients, the PowerPoint
3 first and then the revised document.

4 Anyway, I will start with just a
5 bit of discussion. I guess we were asked by
6 the NOP originally about a year ago to take up
7 this issue. We decided at our pre-meeting
8 that we had on Monday afternoon no one likes
9 the term other ingredients, and so we decided
10 we're going to try out ancillary substances.
11 And so all of these slides say ancillary
12 substances, but just in case you forget what
13 that means, they say other ingredients, too.

14 (Laughter.)

15 MEMBER SONNABEND: And we did not
16 actually revise the original document to say
17 that.

18 But anyway, we received 88
19 specific comments and then a whole bunch that
20 I didn't count that were generally no
21 synthetics in organics. Among the 88 specific
22 comments there were 5 certifiers and the ACA

1 that represents certifiers, 9 companies; I
2 mean production companies in that, OTA, the
3 Trade Association and W,D,& A as the
4 consultants, 4 NGOs and 67 individuals.

5 Unlike some other presentations,
6 because each of these groups had pro and con
7 and suggestions for wording changes -- and so
8 I'm just going to give some general comments
9 from them without singling out who said what,
10 and then we're going to show a few revisions
11 that we made to the recommendation, the
12 proposed recommendations based on the people's
13 comments.

14 Okay. As I mentioned, we
15 developed the proposal in response to the NOP
16 request. Certifiers in general were in
17 support of this Program. The sense was that
18 it balances consumer expectations with the
19 paperwork burden and will allow more
20 consistent decisions among the ACAs. A few of
21 them had suggestions that we have addressed in
22 our revisions to the proposal.

1 Okay. Several NGOs and
2 individuals want an option D where everything
3 is reviewed, and they claim this is required
4 in OFPA. Our attitude is that we're
5 responding to the NOP request and comments
6 regarding what is legal in OFPA is really not
7 our domain and that needs to be taken up by
8 the NOP lawyers and perhaps your lawyers.

9 Our proposal clearly states that
10 we are prepared to review ancillary
11 substances. We're planning to do this to the
12 best of our ability according to the criteria
13 in OFPA. We are not proposing to put them
14 individually on the National List. We're
15 trying to balance the need for vigorous review
16 of all the materials with the budgetary
17 limitations of the NOP and being able to
18 achieve technical reviews, write rules and
19 implement sound and sensible procedures for
20 the NOSB, as well as themselves and ACAs.

21 The checklist we used is in
22 process of being revised to reflect this

1 proposal. An example of one of the questions
2 on it, which comes from category 2, question
3 11, are there other ingredients associated
4 with the substance that have been reviewed as
5 part of the substance? Describe along with
6 proposed limitations.

7 Other questions on the checklist
8 will parallel the same OFPA criteria that we
9 used for the main ingredients. Although some
10 commenters want us to publish checklist
11 questions for comment, we're not planning to
12 do this directly, but we still start using it,
13 this new checklist, for items on the next
14 agenda so you will be able to comment in that
15 context.

16 We acknowledge the concerns raised
17 by two commenters about considering
18 international norms in planning how to
19 implement this review and we realize the
20 details of the procedure will need some
21 refinement and clarification as we start to
22 use it. As they say, it seldom turns out the

1 way it does in the song.

2 This includes exactly what form
3 the allowance information for ancillary
4 substances will take, whether it will be an
5 annotated or whether it will be a combination
6 of annotation guidance or incorporated into a
7 permitted substance list for handling in the
8 future.

9 So we're going to now project our
10 revised version of the document that will deal
11 with some of the additional comments.

12 Okay. Now one factor I want
13 everyone to be aware of is that the NOP is
14 having some challenges incorporating a lot of
15 annotations into the sunset process. They
16 have brought up the possibility to us of
17 starting the supplementary reviews on other
18 ingredients especially for the big categorical
19 things before the normal sunset because we do
20 anticipate that this process of reviewing the
21 other ingredients will add another six months
22 or so to every review while we go out to the

1 community to find out what these other
2 ingredients are and have them come in so we
3 can review them all. And so we may consider
4 taking up the supplementary reviews before the
5 normal sunset so they can be spread out over
6 time.

7 I feel it also necessary to point
8 out to the Board and the public that this is
9 our best proposal from the Handling Committee.
10 If this doesn't pass, we're going to go back
11 to the way things have been done in the past
12 with the NOSB doing haphazard reviews, the
13 ACAs making inconsistent interpretations of
14 those reviews, and the NOP eventually deciding
15 how this will be done in the future.

16 So our first change is on the
17 baseline criteria, which is on page 5 of the
18 proposal. We were unclear in point 4. Now a
19 lot of people misinterpreted and thought that
20 the baseline criteria in some way were review
21 criteria, but the baseline criteria is just
22 the starting point, and that's basically

1 everything. The starting point is everything
2 as long as its allowed in food and not
3 prohibited. So point 4 we've made the
4 clarification change. It's required by the
5 FDA to be on the ingredient label of the
6 product to which the substance is being added.

7 Okay. Onto the policy. We have
8 tried to strengthen the language by taking out
9 a few terms like "if possible" in the last
10 sentence of the third paragraph, and "try to,"
11 because we're not going to do just if
12 possible. We're going to do it. We're going
13 to incorporate restrictions. And we are going
14 to distinguish between non-synthetic ones now
15 that we have the classification of materials
16 out. We had written this before that came
17 out. And so this clarifies that we're going
18 to do it according to the new classification
19 of materials.

20 Now the procedure. A lot of
21 commenters commented that this wasn't really
22 clear whether this was NOSB review criteria or

1 was what ACAs and MROs, etcetera, had to
2 follow. So we added a paragraph to clarify
3 that point, that this procedure refers only to
4 NOSB review, but not ACA procedures. It is
5 anticipated that following adoption of this
6 proposal the NOP will issue guidance for ACAs,
7 MROs and handlers about their procedures in
8 this matter.

9 We took heed of your comments and
10 it was an unintentional leave-out that not
11 just -- we would engender the public or enable
12 the public and the industry to submit their
13 other ingredients and not just ask ACAs for
14 what other ingredients were, or petitioners.
15 We do want this to be a level playing field so
16 that not one brand name is favored over
17 another, and so we plan to try and review the
18 broad range of other ingredients. To that end
19 we changed points 1 and 2 in the NOSB review
20 portion to accommodate public comment and the
21 industry on this.

22 Also, we took out some somewhat

1 vague language on point 8 and we replaced the
2 clause "provided they are specifically
3 acknowledged by the NOSB during review,"
4 because that doesn't have a very clear
5 meaning, and we replaced it with "specific
6 restrictions or prohibitions will be
7 communicated in an annotation or an NOP
8 guidance."

9 Okay. Moving down to the
10 confidential business information section, we
11 had written this before the last version of
12 the CBI policy from the Materials
13 Subcommittee. And so our intention was to
14 refer to that, which was going to originally
15 be a proposal but got turned into a discussion
16 document rather late in the game. So we're
17 changing this language and we perhaps weren't
18 as clear as we could have been that our
19 intention is that ingredients can never be
20 kept confidential. All ingredients have to be
21 disclosed and have to be reviewed. So the
22 wording that we have now is "all other

1 ingredients;" although we may change that to
2 "ancillary substances," "must be disclosed for
3 purposes of NOSB review." All other issues
4 around CBI will be covered by the NOSB
5 recommendation on this subject once it is
6 finalized.

7 Lastly, the portion that we called
8 "Other Considerations," was not -- it was put
9 there for things that we have to be aware of
10 for the future, but not that we would vote as
11 part of this policy or procedure, and
12 therefore we just moved that whole section
13 down to an appendix. And we will take that
14 up, the whole -- about a separate section for
15 cleaners and sanitizers and the like -- that
16 will be taken up at some future date by this
17 Committee is by no means endorsed or voted on
18 as part of this recommendation.

19 So I think that summarizes our
20 changes.

21 MEMBER FOSTER: Thank you, Zea.
22 There was a lot of hard work for a long period

1 of time. Thank you very much for carrying
2 that load.

3 Are there any clarifying questions
4 at the moment? Again I expect a broader
5 discussion after we hear public comment.

6 Nick, go ahead.

7 MEMBER MARAVELL: Yes, Zea, thank
8 you for running us through that. I have been
9 hearing some concern that we may not be
10 reviewing all these other ingredients or
11 ancillary substances to the criteria that are
12 specified in the Organic Foods Production Act.
13 And I'm just going to say our policy says the
14 NOSB intends to review other ingredients. We
15 might want to just clarify for the purposes of
16 the public that intends to review to OFPA
17 standards other ingredients. That would be
18 consistent with what we are saying here, is
19 that correct?

20 MEMBER SONNABEND: I did say that
21 and I plan to do my very best to take a look
22 at all the OFPA criteria as we look at these

1 things, but it's up to each of us to do as
2 much as we can in that regard.

3 MEMBER MARAVELL: And then I had
4 another point of clarification where we refer
5 to going out to the public to solicit
6 additional information that maybe we're not
7 aware of with regard to ancillary substances,
8 or materials; I can't remember what they are,
9 in the sunset process. And this may seem like
10 a minor point, but if we get a petition, we
11 will, you know, obviously put the petition out
12 so the public has access to it, but we have
13 not explicitly stated here that we would
14 welcome -- and that's what I'm questioning for
15 clarification -- we would welcome input from
16 the public once a petition is received as to
17 any substances that are not mentioned in the
18 petition that they may be aware of that we
19 should consider.

20 And the reason I'm raising this is
21 we are not going to have a lot of flexibility
22 with requesting technical reviews and if we

1 find another substance out there that's not in
2 the petition substance but is a major issue,
3 we'd like to have that in time for the
4 technical review process. So I was wondering
5 if that's something that might be accommodated
6 within our procedures here.

7 MEMBER SONNABEND: We did say that
8 in procedure point 1, NOSB 1, and 2, that we
9 would talk to the industry and the public.
10 What we didn't say is the exact mechanism for
11 doing that, because that is still being worked
12 out. What I anticipate though is when we get
13 a petition in, the first meeting notice after
14 the petition could call for other ingredients.
15 That's something we're going to take up at the
16 following meeting in six months. This is why
17 I say it will probably add six months to most
18 petitions. And then we have that time, and
19 hopefully we'll have an open docket so people
20 have a little time to submit these. But then
21 it will be reviewed at the following meeting.
22 We'll probably leave some things behind in the

1 first round, and we're going to have to have
2 a plan B to deal with that, but this is
3 starting somewhere and we're starting
4 somewhere.

5 MEMBER MARAVELL: And then with
6 regard to the NOSB may or may not stipulate in
7 a review that any agricultural other
8 ingredients must be organically produced, how
9 does that work with our commercial
10 availability general policy? Is that clear
11 from this document?

12 MEMBER SONNABEND: That doesn't
13 need to be clear from this proposal. That
14 will be worked out in the course of looking at
15 the ingredients compared to the commercial
16 availability clause.

17 MEMBER FOSTER: All right. Thank
18 you, Nick and Zea.

19 I think I saw Jay. Yes.

20 MEMBER FELDMAN: Thank you. Thank
21 you. So, John, we will have more in-depth
22 discussion on this later at some point?

1 MEMBER FOSTER: That's my intent,
2 yes.

3 MEMBER FELDMAN: Okay. I just
4 want to ask a general question for internal
5 consistency purposes. When we're talking
6 about CBI, we're talking about getting access
7 to all ingredients so that we can review them
8 and we can ensure disclosure. So do you feel
9 like the document does the same thing for the
10 public that enables the public to have access
11 to what is reviewed and to have full
12 disclosure of what is reviewed?

13 MEMBER SONNABEND: Yes, because
14 they will be named on the checklist.
15 Otherwise, ACAs are not going to be able to
16 enforce to this and they will be in the TRs.

17 MEMBER FELDMAN: Okay. But both
18 of those things you just mentioned are
19 internal processes to the NOSB. So through
20 the posting mechanism is how you see it being
21 disclosed to the public? Okay. Thank you.

22 MEMBER FOSTER: Okay. Any

1 clarifying questions at the moment? Yes,
2 Miles, please.

3 MR. McEVOY: Yes, I just wanted to
4 clarify our thinking around the annotations in
5 sunset, kind of add a little bit to that.
6 There have been a number of annotation changes
7 that have been recommended during the sunset
8 process and we have found that that has been
9 incredibly difficult to meet the deadlines,
10 the time frames of sunset, when we're making
11 annotation changes because it complicates the
12 rulemaking process.

13 So what we're requesting is to
14 move forward with these reviews and making
15 recommendations about the annotation changes,
16 but to have any rulemaking that we conduct to
17 make annotation changes be separate some
18 sunset so that we don't run into these very
19 difficult deadline problems, and that the
20 annotation changes could be made through a
21 separate rulemaking process.

22 So we still want these ancillary

1 substances or other ingredients to be
2 reviewed, and it could be potentially done
3 during sunset, but the rulemaking we'd like to
4 do separate if there's any annotation changes.

5 MEMBER FOSTER: Thank you, Miles.

6 Other clarifying questions? Nick?

7 MEMBER MARAVELL: Miles, would
8 that represent any change from what our
9 existing policy and practice is? Aren't we
10 already doing that in effect?

11 MR. McEVOY: Well, the sunset from
12 the last round you made two recommendations,
13 one for relisting as is and one for relisting
14 with an annotation change if there was an
15 annotation change. So you're asking if the
16 future sunset review process will be
17 different?

18 MEMBER MARAVELL: Yes. Or will it
19 be a continuation of what we're doing?

20 MR. McEVOY: Your process will be
21 the same, yes.

22 MEMBER MARAVELL: Okay.

1 MEMBER FOSTER: Was that the end
2 of that clarification or -- I see people
3 looking around as if they want more
4 clarification.

5 MEMBER MARAVELL: I hope so. Does
6 anyone else need more clarification? What I
7 heard was that Miles said we're just going to
8 continue to do what we've been doing.

9 MEMBER FOSTER: Okay.

10 MEMBER MARAVELL: No change.

11 MEMBER FOSTER: Excellent. All
12 right. Then that I believe concludes the end
13 of the introduction of the materials.

14 CHAIRMAN STONE: Thanks, John.
15 And I guess the idea is that we'll have more
16 debate, more conversations, excuse me, on each
17 of these after we hear public comment so that
18 we can include that as part of our
19 deliberations.

20 So with that, I've got several
21 signed up here to speak during the Handling
22 session. Luis Monge. And Luis, please

1 correct me on that pronunciation of the last
2 name. Theresa Frakes is on deck. So, Luis,
3 come on up.

4 And just to remind, if you weren't
5 here yesterday or you're just here today,
6 there's a little stop light system. The green
7 light is for three minutes. The yellow light
8 for one. And when it goes red and the beep,
9 we ask that you stop. And right now Terry
10 Shistar is in the lead to win the prize for
11 being the best on time public presenter.

12 MR. MONGE: Just for the record
13 I'm colorblind.

14 (Laughter.)

15 MR. MONGE: That's true.

16 CHAIRMAN STONE: So when it
17 goes --

18 MR. MONGE: So I'm going to assume
19 that somebody's going to say stop. Okay?

20 CHAIRMAN STONE: When the one on
21 your right gets brighter, then you can step
22 away from the microphone.

1 MR. MONGE: Okay. Good morning.
2 I bet most of you might be asking what is he
3 doing here if there's nothing on the agenda
4 related to bananas or pineapple? Well, that
5 is exactly the reason I'm here today --

6 (Laughter.)

7 MR. MONGE: -- to remember that
8 there is a new petition on -- to list
9 gibberellic acid on 205.605 for post-
10 harvesting organic bananas.

11 Two meetings ago the petition to
12 include the gibberellic acid on 605 fail
13 because we, the petitioners, could not prove
14 that gibberellic acid was essential to organic
15 bananas production.

16 Well, we submitted the new
17 petition making a special emphasis on how
18 essential gibberellic acid is to the
19 sustainability of organic banana production.
20 Months later we receive a letter from the
21 Handling Committee asking for more information
22 and we submitted the requested information.

1 I'm here today to ask the Handling
2 Committee and the NOSB to include gibberellic
3 acid on the agenda for the fall NOSB meeting
4 in Kentucky. I just want to repeat one more
5 time that gibberellic acid, a natural
6 substance already allowed for crop use under
7 601, is a key tool that needs to be used by
8 the organic banana growers to reduce the
9 rejection of the fruit at the packing station
10 and at the market. Please, Handling Committee
11 and NOSB Members, include the gibberellic acid
12 on the fall NOSB meeting agenda.

13 The other reason of my presence
14 here today is to submit a brief report and
15 update on what the organic banana industry in
16 Latin America is doing in order to develop
17 alternatives to rotenone for red rust control.

18 Remember last time in Rhode Island
19 you set the date of January 1st, 2016 to
20 include rotenone in 205.602 as prohibited
21 natural? Well, we organize as the industry.
22 We have had two meetings already. The first

1 meeting was held in Ecuador to set up the
2 coordination group, and the second meeting was
3 in fact a red rust summit held in Piura, Peru.
4 We had the participation of NGOs, a
5 university, local and national authorities
6 from Ecuador and Peru, as well as growers,
7 researchers and private corporations.

8 It was a three-day summit where
9 all the parties shared their research results
10 on banana red rust. We now have a group of
11 representative from all the stakeholders
12 working together towards a common goal; that
13 is, to find real alternatives to red rust
14 thrips control in organic bananas. We will
15 keep submitting update reports on the upcoming
16 NOSB meeting.

17 So thank you and see you in
18 Kentucky.

19 CHAIRMAN STONE: Very good. Thank
20 you, Luis. Questions for Luis?

21 All right. Thank you for being
22 here. Oh, I'm sorry. Harold?

1 MEMBER AUSTIN: Luis, thanks for
2 coming and giving us an update. Were you
3 around yesterday at all? I saw you earlier,
4 but I wasn't sure. Were you around for the
5 discussions with tetracycline at all during
6 the afternoon?

7 MR. MONGE: Not really, no.

8 MEMBER AUSTIN: Okay. And the
9 reason I'm asking, very similar to the tree
10 fruit growers, same type of a resolution, same
11 type of, you know, annotation was made in
12 Seattle in 2011 giving them the 2014
13 expiration date with the challenge to go out
14 and do the research. Very typical, very
15 similar to what the challenge has been given
16 to the banana growers regarding rotenone, to
17 go out, come back to us before that 2016
18 expiration date, showing us that you guys are
19 making progress. It's nice to see that you're
20 here and telling us that you're making
21 progress. Thank you.

22 MR. MONGE: Great. It is always a

1 pleasure to see familiar faces.

2 MEMBER FELDMAN: Hey, Mac?

3 CHAIRMAN STONE: Yes?

4 MEMBER FELDMAN: Luis, I just want
5 to let you know; it's good to see you again,
6 that on these complicated issues we like to go
7 on field trips, but we haven't got an
8 invitation from you yet.

9 (Laughter.)

10 MR. MONGE: You're always welcome.

11 CHAIRMAN STONE: Maybe when the
12 sequester is over we'll get down there.

13 (Laughter.)

14 CHAIRMAN STONE: All right. Thank
15 you, Luis.

16 MR. MONGE: You're welcome.

17 CHAIRMAN STONE: I have Theresa
18 Frakes. I didn't see any movement. Theresa?
19 Very good. Sherry Sirkin is on deck.

20 MS. FRAKES: Hello, my name is
21 Theresa Frakes. I'm a member of the
22 Cornucopia Institute and I'm here today as a

1 citizen lobbyist.

2 Cornucopia agrees with the
3 Handling Committee's recommendation to reject
4 the petition for sulfuric acid. Sulfuric acid
5 is classified as a group 1 carcinogen and is
6 toxic to humans. It should not be added to
7 the National List. We disagree with an
8 industry consultant who commented that
9 sulfuric acid should be added to the National
10 List to allow the manufacturer of organic
11 citric acid. That is a classic example of
12 changing the regulations to change the
13 definition of organics and we believe that is
14 unacceptable. Sulfuric acid is a toxic
15 synthetic substance. It is not compatible
16 with organic principles.

17 Cornucopia also agrees with the
18 Handling Subcommittee's recommendation to
19 reject DBDMH. DBDMH is an antimicrobial
20 chemical used in conventional slaughterhouses
21 to control pathogenic bacteria such as E.
22 coli. DBDMH fails every criterion for

1 inclusion on section 205.605. The EPA even
2 considers DBDMH to be a pesticide.

3 The petition withheld important
4 information from the NOSB, the technical
5 reviewer and the public. The withheld
6 confidential business information included an
7 entire section titled "Effects on Human
8 Health."

9 Alternatives exist including those
10 discussed at length in the TR; peracetic acid,
11 hot water washing, chlorine and hydrogen
12 peroxide. The lack of publicly available
13 safety testing data combined with strong
14 indications that human health and
15 environmental concerns exist renders this
16 material a poster child of why U.S. consumers
17 are switching to the organic label which
18 mandates greater scrutiny of chemical inputs
19 in food production.

20 Some of the answers on the
21 decision tree should be corrected. We do not
22 agree that the answer to the question are

1 there adverse effects on environment from
2 manufacture use and disposal is no. It
3 appears that DBDMH and its breakdown product
4 hypobromous acid are both toxic to aquatic
5 life. The only information regarding the
6 environmental impacts of DBDMH comes from the
7 petitioner. If anything, the environmental
8 impacts are unknown and we do not believe the
9 Handling Subcommittee has enough information
10 to confidently state that no negative
11 environmental effects exist.

12 The Handling Subcommittee also
13 answered no to the question is there any
14 harmful effect on human health. Multiple
15 animal studies on DBDMH and its breakdown
16 product hypobromous acid have shown effects on
17 the reproductive and endocrine function.
18 Again, the fact that the Handling Subcommittee
19 does not know the answer to this question does
20 not justify the assumption that the material
21 is safe for human health.

22 Serious concerns exist about this

1 synthetic antimicrobial which is regulated as
2 a pesticide by the EPA. Animal studies
3 suggest its breakdown product may be an
4 endocrine disrupter. Operating under the
5 precautionary principle the NOSB should reject
6 the petition to add DBDMH to the National
7 List.

8 Thank you for considering our
9 comments.

10 CHAIRMAN STONE: Thank you very
11 much. Are there any questions for Ms. Frakes?

12 Thank you very much for being
13 here.

14 Sherry Sirkin to the podium.
15 Sherry? Okay. Thank you. And Charlotte Uris
16 is on deck.

17 MS. SIRKIN: Morning. My name is
18 Sherry Sirkin. I'm a member of the Cornucopia
19 Institute and I'm here today as a citizen
20 lobbyist, although I'm also a small farmer
21 just 20 minutes east of here.

22 We urge you to reject the petition

1 for sugar beet fiber. Read some of the 1,300
2 public comments submitted to you through
3 regulations.gov and it will confirm what
4 public interest groups like Cornucopia repeat
5 over and over to you. Organic integrity is
6 important. Organic consumers feel very
7 strongly that organic foods should contain
8 organic ingredients. I know that seems like
9 a no-brainer, yet the Handling Subcommittee
10 voted unanimously to allow conventional sugar
11 beet fiber in organic foods.

12 The petitioner, Nordic Sugar,
13 confirmed in a written comment that the
14 conventional sugar beet seed they use is
15 treated with a pesticide that belongs to the
16 neonicotinoid class, or neonics pesticides,
17 are deadly to honeybees. In a front page
18 story from the New York Times just a few weeks
19 ago, March 29th, began as follows: "A
20 mysterious malady that has been killing
21 honeybees en masse for several years appears
22 to have expanded drastically in the last year,

1 commercial beekeepers say, wiping out 40 or
2 even 50 percent of the hives needed to
3 pollinate many of the nation's fruits and
4 vegetables."

5 The New York Times story goes on:
6 "A conclusive explanation so far has escaped
7 scientists studying the ailment, Colony
8 Collapse Disorder, since it first surfaced
9 around 2005, but beekeepers and some
10 researchers say there is a growing evidence
11 that a powerful new class of pesticides known
12 as neonicotinoids incorporated into the plants
13 themselves could be an important factor." And
14 it seems to me every new day a study shows the
15 connection between neonicotinoids and Colony
16 Collapse Disorder.

17 And now they Handling Subcommittee
18 recommends we add conventional sugar beet
19 fiber to organic foods even with the full
20 knowledge that conventional sugar beet is
21 treated with a neonic pesticide. They're
22 ignoring their legal responsibilities to

1 protect the environment under OFPA. For that
2 reason alone the petition asking to allow
3 conventional sugar beet fiber in organic foods
4 should be rejected, and we hope unanimously.

5 There are dozens more reasons to
6 reject the petition, and I'd like to speak
7 about just two others. The petitioner may be
8 in Europe where sugar beets are not currently
9 genetically engineered because they don't
10 allow it there, but if it is added to the
11 National List, it will open the door for
12 conventional sugar beet fiber sourced from
13 anywhere in the world, including the U.S. And
14 in the U.S., according to the USDA's own data,
15 95 percent of conventional sugar beets were
16 genetically engineered in the 2009-2010 crop
17 year.

18 Finally, this material is not
19 essential to organic production. There is
20 currently plenty of fiber in certified organic
21 food and this is really just a gimmicky
22 nutraceutical that is being petitioned in

1 order for multinational corporations to be
2 able to make certain health and marketing
3 claims on their label. Consumers who want
4 more fiber in their diet can eat whole organic
5 foods that are rich in fiber. Consumer survey
6 data from various sources; the PCC Natural
7 Market surveyed 1,500 organic shoppers, found
8 that organic consumers expect the added
9 nutrients in organic foods to be organic.

10 And finally, I'd like to add that
11 I'm a grower of mostly vegetables here and I'm
12 actually not certified organic because I
13 direct sell every single vegetable that leaves
14 our farm. I know the people who eat it. But
15 when I go shopping as a consumer, I prefer to
16 buy organic because I don't want to be a
17 guinea pig and be part of the genetic
18 engineering test. And I oppose genetic
19 engineering strongly. And the one thing that
20 I feel confident is that if I eat organic
21 food, I'm not exposing myself to genetic
22 engineering.

1 So thank you for considering our
2 comments.

3 CHAIRMAN STONE: Thank you very
4 much. Any questions from the Board?

5 All right. Thank you for taking
6 time to be here. We appreciate it.

7 Charlotte Uris is to the podium
8 and Goldie Caughlan on deck.

9 MS. URIS: Hello, my name is
10 Charlotte Uris. A chemical exposure changed
11 my life. I now have multiple synthetic
12 chemical sensitivities and any additional
13 chemical exposures could be harmful to me.
14 People like me with sensitivities to the
15 numerous synthetic chemicals that didn't exist
16 for thousands of years of human history and
17 life on earth are like the canary in the mine
18 warning of danger. We have the same bodies as
19 you do, as your children do, as your
20 grandchildren do. Keeping organic food truly
21 organic is necessary, marketable and moral.

22 I'm a member of the Cornucopia

1 Institute here today as a citizen lobbyist.

2 We urge you to reject the petition
3 to add barley beta fiber to the National List.
4 Barley beta fiber appears to be petitioned to
5 serve as a marketing tool for organic
6 processors to increase fiber content and
7 justify an FDA-approved health claim on the
8 food or beverage packaging. A Michael Pollan
9 food rule is never buy a product that makes a
10 health claim. Eat real food, he says.

11 Organic consumers want real and organic food.
12 Adding conventional barley beta fiber
13 manufactured by Cargill to organic foods would
14 be a marketing disaster for the organic label
15 in general.

16 Organic consumers expect organic
17 foods to contain only organic ingredients.
18 There is some tolerance for synthetics that
19 are truly essential, carefully reviewed for
20 safety and for which no alternatives exist
21 like sodium bicarbonate, baking soda, to make
22 organic cookies. There's nothing essential or

1 even healthy about conventional barley beta
2 fiber in organic foods.

3 PCC Natural Market's 2011 survey
4 confirms that organic consumers do not want
5 added nutrients in their organic foods unless
6 they are derived from an organic source.
7 Nearly two-thirds of respondents said they
8 would not knowingly purchase organic foods
9 with a conventional added nutrient. And one-
10 quarter said they would be less inclined to
11 purchase an organic product with a
12 conventional added nutrient.

13 If you have any doubt whether
14 organic consumers feel strongly that the
15 organic products they buy should be
16 trustworthy, truly organic, containing only
17 organic ingredients, please read some of the
18 1,300 citizen comments submitted to you
19 through regulations.gov.

20 Organic consumers buy organic
21 foods to avoid GMOs, avoid pesticides and
22 protect the environment from the toxins used

1 in conventional agriculture. Barley beta
2 fiber is made from conventional barley. Toxic
3 and environmentally damaging fumigants are
4 likely used in storage. Methyl bromide, an
5 ozone-depleting fumigant which is so
6 environmentally disastrous it's being phased
7 out, is still used to fumigate barley.
8 Another fumigant, sulfuryl fluoride is a
9 greenhouse gas 4,000 times more efficient at
10 trapping heat than carbon dioxide. Ethanol is
11 used in the processing of barley beta fiber
12 and is likely derived from genetic engineering
13 corn.

14 Cornucopia found that Cargill has
15 identified a specific enzyme used in barley
16 beta fiber production for which the patent
17 states that the bacteria have been genetically
18 engineered. Cargill is the sole manufacturer
19 of barley beta fiber in the U.S. Cargill
20 routinely uses genetic engineering. In fact,
21 the corporation contributed a quarter million
22 dollars to defeat proposition 37 in

1 California.

2 Barley beta fiber is entirely
3 incompatible with organic principles. Organic
4 consumers will lose confidence in the
5 integrity of the organic label if this is
6 allowed in organic foods endangering the
7 organic industry. Please reject the petition.

8 Thank you for considering
9 Cornucopia and my comments.

10 CHAIRMAN STONE: Thank you very
11 much. Any questions from the Board? John?

12 MEMBER FOSTER: Excuse me, I have
13 a question over here.

14 MS. URIS: Okay.

15 MEMBER FOSTER: How is this
16 conventional ingredient different in any of
17 the aspects than any of the other conventional
18 ingredients on 205.606 currently?

19 MS. URIS: I don't understand all
20 the technicalities, but basically a
21 genetically modified enzyme is used to process
22 the beta fiber, which is a conventional beta

1 fiber from conventional barley which should
2 not even be in the organic product.

3 MEMBER FOSTER: So if that's the
4 case; I don't know that that's the case, but
5 if that's case, would it not be prohibited
6 under other portions of the regulation?

7 MS. URIS: I didn't understand the
8 question or quite hear it.

9 MEMBER FOSTER: If it's a genetic-
10 engineered material, then it would be
11 prohibited for other reasons.

12 MS. URIS: Well, I would think so,
13 yes.

14 MEMBER FOSTER: I would hope so.
15 I don't know that that's the case, but I think
16 that there's other prohibitions that would
17 keep that ingredient from being --

18 MS. URIS: This is based on the
19 research of Cornucopia where they are saying
20 that it's a patented genetic enzyme. I'll go
21 back to exactly the way they describe it:
22 It's a specific enzyme used in barley beta

1 fiber for which the patent states that the
2 bacteria have been genetically engineered.

3 MEMBER FOSTER: So if that's the
4 case, I'm thinking that that would be
5 prohibited for other reasons, right?

6 MS. URIS: And are these reasons
7 that you wouldn't be dealing with in this
8 Committee? Is that what you're saying?

9 MEMBER FOSTER: Well, there's
10 provisions in the regulation that prohibit the
11 inclusion of genetic-engineered material.

12 MS. URIS: I just see all of these
13 things as being relevant to the organic
14 standards and that's why all of these things
15 are being brought up in this particular
16 testimony and hearing.

17 MEMBER FOSTER: Yes. Right. Is
18 that the only distinction see as far as, you
19 know, this being different than other
20 materials on 606, or is that one of the unique
21 qualities?

22 MS. URIS: Every one of the things

1 I've said are things that are of concern to me
2 as an organic consumer. As I explained in the
3 beginning, I'm very sensitive and I have
4 actually had organic products that have had a
5 significant negative impact on me, one,
6 because of processing or even because of the
7 storage. For example, organic apples. Some
8 of them are stored. They might be organic
9 apples, but if they're stored in the wrong
10 kind of boxes and packaging to keep them from
11 getting moldy or spoiling, they actually have
12 a negative impact on me.

13 MEMBER FOSTER: I'm sorry to hear
14 that.

15 MS. URIS: So all of what I'm
16 saying is I really am like a canary in the
17 mine.

18 MEMBER FOSTER: Yes.

19 MS. URIS: And when other people
20 might just think, oh, this is a funny-tasting
21 apple, you know, think about -- I had a brief
22 moderate toxic load that totally changed my

1 life. With all of these synthetic chemicals
2 that basically have come into our world since
3 around the time of World War II, which are
4 really new things, for most people it's more
5 of a slow loading of the system. Some of the
6 things can be cleared and some can't.

7 MEMBER FOSTER: Yes.

8 MS. URIS: I'm the canary in the
9 mine. That's what I'm saying.

10 MEMBER FOSTER: Thank you. Just
11 one more question. Are you aware of the 100
12 percent organic claim? Do you see that in the
13 marketplace?

14 MS. URIS: I am. I think it's
15 very complex to figure out what that really
16 means, because there are things that say
17 organic that you'd think by reading the label
18 is organic.

19 MEMBER FOSTER: Thanks.

20 MS. URIS: -- you know? And I'm
21 not just talking for myself. I'm concerned
22 for other people besides myself.

1 MEMBER FOSTER: Thank you very --

2 MS. URIS: That's why I'm doing
3 this testimony, too.

4 MEMBER FOSTER: Thank you. I
5 appreciate it.

6 CHAIRMAN STONE: Thank you very
7 much. Goldie Caughlan to the podium and
8 Charlotte Vallaey's on deck.

9 MS. CAUGHLAN: Thank you. Yes, my
10 name is Goldie Caughlan and I formerly served
11 on this Board as well in 2001 until '06. I'm
12 from Seattle, worked for nearly 30 years with
13 PCC Natural Markets.

14 Regarding other ingredients,
15 ancillary or otherwise, the Organic Foods
16 Production Act, the USDA Organic Regs and
17 previous USDA statements have all made it
18 indisputably clear that all ingredients in an
19 organic product must either be organically
20 produced or appear on the National List.
21 There is no distinction existing between
22 ingredients and other ingredients. We urge

1 the NOSB to use the organic law and the
2 regulations for setting policy regarding other
3 ingredients.

4 OFPA states, unequivocally we
5 believe, that every synthetic and non-organic
6 ingredient must be listed for its specified
7 purpose. For example, if rennet cannot be
8 made without sodium benzoate, a currently
9 unapproved synthetic, then sodium benzoate
10 should be petitioned for the specific purpose
11 of use in rennet.

12 The current practice of allowing
13 ingredient suppliers to use any synthetic
14 preservative, stabilizer or other ingredient
15 and to justify this based on the fact that
16 these suppliers are not certified organic
17 handlers, is itself a violation of OFPA and
18 should end. The success and continued growth
19 of the organic industry absolutely depends in
20 large part on consumer trust in the organic
21 label. You've heard it frequently, not just
22 from Cornucopia. And in turn, the success

1 would depend upon the NOSB, the USDA and the
2 industry's combined adherence to the organic
3 law and the regulations.

4 Without question, if organic
5 consumers know that the organic products that
6 they buy could contain unapproved ingredients
7 such as polysorbate 80 or sodium benzoate and
8 others and are processed with materials such
9 as hexane and propylene glycol, then they
10 would undoubtedly feel deceived, and
11 rightfully so, and we will all be the ones who
12 bear the results of that.

13 You've heard about the data from
14 PCC. I don't need to say that again, but we
15 must remind you again apparently that over
16 1,500 of our shoppers found that organic
17 products containing an added nutrient with
18 unapproved ancillary ingredients would not be
19 purchased by an overwhelming majority of
20 organic shoppers.

21 Since these other ingredients are
22 not required, however, to be listed in the

1 ingredient lists of a processed food, most
2 consumers likely don't realize -- in fact, I
3 know that they don't from talking with them,
4 which is what I spent a lot of time doing with
5 consumers over that period of three decades.
6 They know. They believe they can believe, and
7 then there is the moment of surprise. They
8 don't know that if they buy a product with
9 algal oil, for example, that they're buying a
10 product with glucose syrup solids possibly
11 derived from genetically engineered corn,
12 synthetic stabilizers and additional
13 unapproved synthetic other ingredients. But
14 those other ingredients do have to be listed.

15 CHAIRMAN STONE: All right. Thank
16 you very much. Zea?

17 MEMBER SONNABEND: Thank you,
18 Goldie. When you were on the NOSB did you
19 bring up any of this testimony in reviewing
20 petitions or to the Department about these
21 other ingredients?

22 MS. CAUGHLAN: As you probably

1 will remember, Zea, during the final phase of
2 the time that we spent on the Board just
3 during the last part of 2005, as a matter of
4 fact there was a great deal of discussion and
5 concern about these issues and it was a very
6 troubling time in many respects on the Board.
7 And I don't need to go over that, but there
8 were certain situations that made it much more
9 so. I would say that we talked about these
10 things exhaustively long and it was very
11 confusing. And I think that we bear part of
12 the problem, because I think perhaps some of
13 the confusion started with that Board, our
14 Board's decision.

15 I've spoken with some of the other
16 members of the people that were on the Board
17 at that time and we all, you know -- so the
18 fact of the matter is we don't need nor want,
19 and we certainly should not continue with the
20 mistakes that well-meaning people dealing with
21 the same kinds of very difficult issues that
22 all of you are dealing with, doing your

1 darnedest to come up with decent answers. But
2 it doesn't excuse us from the fact that right
3 now we're faced with the fact that we will
4 only add to the problem if we don't attempt;
5 and I believe you are attempting, to make a
6 situation where this will not go forward. But
7 it's not a pleasant situation, as I'm sure you
8 would agree. Thank you for your work on this.

9 CHAIRMAN STONE: Jay?

10 MEMBER FELDMAN: Thank you,
11 Goldie, and thank you for all you have
12 contributed to the organic movement --

13 MS. CAUGHLAN: Thank you.

14 MEMBER FELDMAN: -- both on the
15 NOSB and at PCC. You know, we've been going
16 through a lot of these issues where the Board
17 is trying to grapple with consumer
18 expectations and trying to review inputs, the
19 inert ingredient issue, which I view as a
20 similar parallel sort of situation, which the
21 Board has committed itself to review those
22 ingredients which have here to date been

1 inadequately reviewed, I would say. And so
2 now we have and have had for a long time a
3 similar situation with other ingredients.

4 So obviously there's a workload
5 issue.

6 MS. CAUGHLAN: There is.

7 MEMBER FELDMAN: And there's a
8 question of resources. And, you know, you
9 heard the director of the Program earlier
10 talking about the difficulties of annotation
11 and, you know, which --

12 MS. CAUGHLAN: Right.

13 MEMBER FELDMAN: -- has been added
14 as a function of our sunset review, or that
15 authority, which I think is an important one.

16 What advice can you give to this
17 Board as we grapple with this proposal and at
18 the same time grapple with the OFPA standards
19 and requirements, as you indicated? What
20 advice can you give us in terms of creating a
21 system that meets those standards, does not
22 overwhelm the Board and the Program, ensures

1 integrity from a consumer perspective as
2 organic continues to grow?

3 MS. CAUGHLAN: Thank you for
4 asking. I will answer from my own
5 perspective. A perspective that has been
6 shared, I believe, by others that I have
7 spoken with is that I think the Board is
8 always, and increasingly so, under incredible
9 pressure to respond and to do so at the behest
10 of industry which comes to us constantly
11 asking for more tools, understandably. And
12 it's, if I can put it that way, almost a sense
13 of imperative. We have to do this. We have
14 to hear this. And we heard it yesterday in
15 regard to several very serious issues, the
16 constant pressure that you must perform, that
17 you must give that which has been asked.

18 The reality is it is incumbent
19 upon each of us when we sit in those sometimes
20 very uncomfortable chairs for hours at a time
21 that the fact is much of the individual public
22 voice is not necessarily coming through with

1 the drum beat that is heard from industry
2 itself.

3 And so the work of people like
4 Cornucopia, which is not frequently viewed
5 with acceptance or concern when it's -- by
6 members of this Board I'm sure -- are looked
7 at, I'm sure, as nitpickers, but they're
8 attempting to bring to your attention to the
9 fact that consumers' voice is very, very, very
10 important. After all, if the consumers lose
11 their confidence in the product, what do you
12 have? What does industry then have? What do
13 any of us have? None of us got into this
14 originally with the intent to continuously
15 have acrimony. I think the fact of the matter
16 is the consumers are basically the end
17 choosers, and I think that that has to be
18 revisited frequently in our thoughts.

19 And I heard some rather
20 disparaging kinds of comments yesterday. I
21 don't think it was intentional, but in
22 exasperation I heard some Board Members and

1 others feeling that consumers don't really
2 know what they're talking about or don't
3 really care, don't really understand. If they
4 don't understand, then somebody with all the
5 ability to market to those consumers better
6 take a look at it. Are we telling people just
7 enough or just what we think people want to
8 hear, or are we leveling with people?

9 That's all. I'm sorry. I think
10 that it's extremely important to realize that
11 you have a very awesome task in front of you.
12 You're not there just to serve industry,
13 however. It is a partnership between the
14 producer and the consumer and that consumer
15 has to have an opportunity to truly influence
16 or this is not going to work very long.

17 CHAIRMAN STONE: Thank you. It's
18 great to hear from the heart. We listen
19 closely when we hear that tone.

20 MS. CAUGHLAN: Thank you so much.

21 CHAIRMAN STONE: Thank you. Thank
22 you very much.

1 CHAIRMAN STONE: Thank you.
2 Charlotte Vallaeys to the podium and Allyson
3 Kelly on deck.

4 MS. VALLAEYS: Hi, my name is
5 Charlotte Vallaeys. I'm policy director at
6 the Cornucopia Institute. I have two master's
7 degrees, one in nutrition from Tufts and one
8 from Harvard in ethics.

9 I'd like to urge many of us, you,
10 to stop viewing and talking about organic
11 consumers as if they're a nuisance, as if
12 they're misinformed, irrational and therefore
13 irrelevant. We've heard a lot of that over
14 the last couple of days and hours.

15 It sounds a lot like conventional
16 agribusiness. They don't think very highly of
17 their customers either. But organics grew
18 because consumers are interested, because they
19 do care, because they are informed, and most
20 importantly because they want clean, safe and
21 responsibly-produced food, the same reason
22 that people collectively spent \$30 billion

1 last year on organic food to avoid the
2 pesticides and the GMOs that the FDA and the
3 EPA tells us are perfectly safe.

4 It's the same reason they're
5 asking you now to remove antibiotics from
6 organic production, to ensure sugar beet fiber
7 and barley beta fiber; conventionally produced
8 ingredients, don't make their way into organic
9 foods and that all ingredients, including
10 ingredients of ingredients, no matter how they
11 got into the finished product and regardless
12 of whether they're listed in the ingredients
13 list -- that they be either organic or on the
14 National List.

15 Organics is a vehicle for positive
16 change. People who buy organic do so to
17 support a food production system that does the
18 right thing. This is very much about ethics.
19 Nobody expects the organic apple industry to
20 solve the global problem of resistance to
21 critically important antibiotics, but
22 consumers expect organics to be part of the

1 solution. They expect organic producers to do
2 the right thing. And they certainly don't
3 expect organics to be part of the problem,
4 which in the case of antibiotics it is.

5 Consumers feel betrayed when they are informed
6 that the organic foods they were buying, that
7 the organic seal that they trusted is not what
8 they thought it was.

9 And organic consumers expect all
10 ingredients to be either organic or on the
11 National List. This is backed by solid
12 consumer survey data. And no, OFPA does not
13 state that consumer expectations are one of
14 the criteria, but in this case the consumer
15 expectation does not come out of nowhere. It
16 comes from OFPA, which does not distinguish
17 between ingredients and other ingredients and
18 requires all ingredients to be either organic
19 or on the National List.

20 So here's Cornucopia's
21 recommendation, and it's a simple one: Follow
22 the law. The organic industry needs to be

1 honest. Consumers are told that unreviewed
2 synthetics do not end up in organic food, but
3 they do as ingredients of ingredients that are
4 because of faulty FDA labeling laws not listed
5 in the ingredients list. They look to you to
6 follow the law in this case.

7 The NOSB needs to do everything in
8 its power to preserve consumer trust in the
9 organic label. The organic industry needs
10 consumer trust a lot more than a segment of
11 apple producers need antibiotics. And yes,
12 consumer trust is more important to all of us
13 than the unreviewed and unapproved potentially
14 harmful ingredients that end up in organic
15 foods as ingredients of ingredients. Thank
16 you.

17 CHAIRMAN STONE: Thank you,
18 Charlotte. Any questions from the Board?
19 Jay?

20 MEMBER FELDMAN: Thank you,
21 Charlotte. I'm interested in the discussion
22 that John had earlier with; I'm sorry, I

1 forget her name, the other witness on the
2 fiber issue. There's a patent, and I guess
3 the question that we would need to know is
4 whether that is unique to this particular
5 petition and the materials that are associated
6 with the petition and how you would view the
7 Board's responsibility in terms of evaluating
8 the genetically engineered component of that
9 as distinct from other inputs that might fall
10 under the petition that would not be affected
11 by a genetically engineered substrate or
12 ingredient to the process.

13 MS. VALLAEYS: Well, I think in
14 the case of barley beta fiber what our
15 volunteer Cornucopia member said organic
16 consumers said is it's about everything about
17 this barley beta fiber, the fact that it is
18 not essential. You can get fiber from whole
19 foods. And I think that it does come as a
20 shock to consumers when they find out that
21 non-essential, in this case, marketing tools
22 that are not organic, that are treated with

1 fumigants, with pesticides, in this case with
2 GMO enzymes are added. And I mean we would,
3 you know, certainly hope that the certifiers
4 would look at the GMO enzymes, and if there
5 are GMO enzymes, would not allow them. But in
6 this case Cargill appears to be the only
7 producer of barley beta fiber. And so it's
8 one of the many components that contributes to
9 our concern about this particular petition.

10 MEMBER FELDMAN: Have we faced
11 this before? Have we faced this sort of
12 question before where a material that's being
13 petitioned appears to have an individual
14 component that's essential to the production
15 of that material or that substance known to be
16 genetically engineered and we sort of say,
17 well, we don't know? We're going to put on
18 the List and let somebody figure out? I mean
19 do you believe that to be the responsibility
20 of the Board or the petitioner to ensure that
21 we know whether there are other practices or
22 other inputs that could fit under this new

1 listing that are not genetically engineered?
2 I mean do we have that burden as a Board to
3 know that?

4 MS. VALLAEYS: Well, you know, it
5 comes back to the other ingredients
6 discussion, which is what is the
7 responsibility of the Board? And it fits very
8 nicely, because that's in part why for the
9 other ingredients issue we're saying it
10 actually should not be the responsibility of
11 the Board. It is the responsibility of the
12 Board to put very specific single materials on
13 the National List and then all the other
14 ingredients and all the -- you know, since --
15 well, and process aids, but in this case since
16 it's an excluded method, that the certifiers
17 will look very closely at that. And if it
18 does not fit the criteria and the law, that
19 those would not be allowed into organic foods.

20 And the reason we bring this up
21 here is because what we've discovered over the
22 past couple of years -- in looking very

1 closely at some of the petition materials, we
2 discovered this was not happening. So that is
3 why we're bringing it up. It happened with
4 DHA algal oil. We saw the petition before the
5 Board and all of the other ingredients that
6 were in an organic baby food, which was
7 confirmed, were not in the petition, were not
8 reviewed and the certifiers were letting it
9 in. So that is why we're bringing up these
10 issues now. And it is relatively recent,
11 because it's something we discovered only a
12 couple of years ago.

13 MEMBER FELDMAN: So just to be
14 clear, in the absence of a policy like that,
15 this Board has historically taken action to
16 restrict some of the other ingredients. I
17 mean we did that on DHA. We happened to focus
18 in on one extractant, you know, hexane. But
19 we could have limited the other ingredients.
20 I mean we have done that in a limited fashion.
21 I guess the question I have, given that
22 there's a patent involved here and the

1 petition is reliant on that patented process;
2 we know what that patented process is, do we
3 have a duty to address that in an annotation
4 or to address it when we're thinking about the
5 overall material? Not to say that there
6 aren't other issues that Board Members may
7 want to consider in voting this up or down.
8 I'm just focused on the GMO issue right now.

9 CHAIRMAN STONE: All right. Nick?

10 MEMBER MARAVELL: Yes, Charlotte,
11 I'm referring now to our other ingredients
12 policy that's been proposed here to the Board.
13 I know we don't have two or three hours to sit
14 and discuss it in detail, you and I right here
15 in this venue, but I mean if you could say
16 I've got two major concerns and this is what
17 I would do to fix it, what might those be?
18 You know, just briefly what is it that you
19 feel would set the Board --

20 MS. VALLAEYS: Sure.

21 MEMBER MARAVELL: -- going in the
22 best possible direction?

1 MS. VALLAEYS: Well, when the memo
2 from the USDA was received in 2011, November
3 2011, it was to develop a policy. And so we
4 don't think that putting more work on the
5 Board to review all the other ingredients is
6 necessarily the solution. It could be as easy
7 as a policy that you as the Board are saying
8 to the organic community, to certifiers, to
9 industry, saying every ingredient, including
10 ingredients of ingredients, including those
11 that the consumer doesn't see, but that are on
12 the spec sheets that certifiers see; that is,
13 the certifier who makes sure that all those
14 other ingredients are either organic or on the
15 National List.

16 And that seems to be a very simple
17 solution that would be very lawful, you know,
18 following the law that would be simple for you
19 as well. So you would be reviewing individual
20 single substances. And then if manufacturers
21 need other ingredients, that those be reviewed
22 by the certifier. And obviously if we had it

1 our way, yes, the FDA labeling laws would
2 change and the consumer would also be able to
3 see those. But since that's not the case, we
4 believe it is the job of the certifiers to
5 make sure that everything that ends up in an
6 organic food is organic or on the National
7 List.

8 So the second thing; because you
9 asked for two, is if a manufacturer of another
10 ingredient says I absolutely need material X
11 to make this ingredient, then they could
12 petition that for the specific use in the
13 ingredient that they need it for. And then
14 again, it would be a very transparent process.
15 Consumers would know, the public would know
16 what's going into which foods, and then it
17 would be reviewed according to OFPA's criteria
18 again. So if they say I need material X, but
19 it turns out that's harmful to human health,
20 then it is up to the NOSB to review it and
21 ensure the public that indeed what they are
22 buying as organic, that everything in it has

1 been carefully reviewed and meets the legal
2 criteria for being in organic food.

3 MEMBER MARAVELL: Let me just
4 clarify. So you're saying in certain
5 instances an additional petition -- that would
6 represent something different than what is
7 currently going on, that an additional
8 petition would be required? Is that what
9 you're saying? I'm not quite following.
10 You're saying that an additional petition for
11 something that we're calling an other
12 ingredient may be called for?

13 MS. VALLAEYS: Right. So if there
14 is a preservative that a manufacturer says
15 they need for rennet or any of the other
16 ingredients already on the National List, that
17 they petition that, that they say I need this
18 to make my rennet which is on the National
19 List. And then they petition that. And then
20 that material could be on the National List.
21 And OFPA states that the National List should
22 list materials for their specific use or

1 application. So then it could say for the
2 specific use of rennet, but nothing else. And
3 then it's up to you to decide.

4 MEMBER MARAVELL: And is it
5 possible that the Board could have already
6 decided broad classes of materials that are
7 either prohibited or permitted with regard to
8 rennet, and so that petition might not be
9 necessary? Do you see that as a possibility?

10 MS. VALLAEYS: Are you saying that
11 you review all the ingredients and put it in
12 an annotation, for example?

13 MEMBER MARAVELL: Well, we might
14 review classes of ingredients that we would
15 say would meet OFPA standards unless there was
16 some reason not to. Yes, I mean in other
17 words do you perceive that that could occur,
18 that the Board could review rennet and comment
19 on major categories?

20 MS. VALLAEYS: So like synthetic
21 preservatives you can --

22 MEMBER MARAVELL: Yes, we could

1 say for example no synthetic preservatives.
2 I'm just making that up. Do you see that as
3 a possibility?

4 MS. VALLAEYS: Well, there's a
5 concern there when you start putting in the
6 annotations, first of all, the concerns we've
7 heard from the USDA, but our concern would be
8 if there are prohibitions in an annotation,
9 the danger there is that a petitioner tells
10 the Board the ingredients, the other
11 ingredients they're using. You review those
12 and those get prohibited, which would open the
13 door to a competitor which maybe uses
14 something else. Since that has not been
15 reviewed and they're not prohibited, those
16 would then -- and it would not be a level
17 playing field. It would put the petitioner at
18 a competitive disadvantage and I'm sure that's
19 the last anybody here wants to do.

20 MEMBER MARAVELL: No, that's
21 another issue which is prohibited versus
22 permitted. But, yes. Okay. I was just

1 exploring this with you. Thank you.

2 CHAIRMAN STONE: All right.

3 Harold, if you'll wrap this up?

4 MEMBER AUSTIN: Hi, Charlotte.

5 MS. VALLAEYS: Hi.

6 MEMBER AUSTIN: In your comments
7 you mentioned a little bit tetracycline; go
8 figure, and the consumers. The consumers are
9 definitely an intricate part of the organic
10 community, and I think we all respect that.
11 And I think we all know that those that are
12 growers/producers, they can produce their
13 little hearts out. And if there's not a
14 consumer out there to eat the products of
15 their labor, the fruits of their labor, it's
16 all for naught.

17 But we're talking about an issue
18 that is very passionate, very emotional on all
19 sides of the equation where we have a group of
20 stakeholders that are using a material that is
21 actually on the National List. They've
22 developed their livelihoods. They've

1 developed their farms, their practices as part
2 of their process, not necessarily a basic
3 fundamental, but as a tool that they can use
4 to get from one point to another.

5 How do we move forward as an
6 organic community to find a point of
7 commonality to where we can support the
8 various components of the organic industry and
9 the stakeholders and I mean -- and that's from
10 growers to retailers to the consumers
11 ultimately themselves, to where we can not
12 make the accusations and not make he said, she
13 said, they said, we said, but a point of
14 commonality to where we can agree to agree for
15 the benefit of all and for most importantly
16 for the organics to move forward? On an issue
17 like this how do we move forward?

18 This is one of those ones where in
19 2011 there was a resolution, there was an
20 expiration date, there was a challenge put
21 forth to a group of stakeholders to go out and
22 redefine their processes, to come back, show

1 that they're making progress to move away from
2 that material. And I think there are strives
3 to get there and I think all of the tree fruit
4 growers anywhere that you talk to are going to
5 be striving and are striving to get to that
6 point so that the consumers can have full
7 confidence that an antibiotic like
8 tetracycline is not being used.

9 But in the interim how do we work
10 together as a group of organic stakeholders on
11 all spectrums to achieve that? What are your
12 thoughts there?

13 MS. VALLAEYS: Well, I think for
14 the antibiotics issue there's a lot of emotion
15 definitely, but what bothers me sometimes is
16 when the consumer groups are the ones that are
17 accused of being emotional, of not being
18 scientific, when we are basing our concerns on
19 Dr. Morris, on the physicians, on the World
20 Health Organization saying we need this
21 particular antibiotic, and every time it is
22 used in an agricultural setting we are risking

1 losing that. That's what we're basing our
2 emotions on.

3 And then we have to -- the
4 consumer groups, the Cornucopia -- have to
5 listen to the producers who get up here and
6 are also very emotional, are saying I'm going
7 to watch all my trees die. How is that not
8 emotional? So we're saying we are not
9 irrational. Cornucopia is not -- we are
10 science-based as much as -- well, we base
11 everything that we say on sound science. And
12 there can be different -- within science there
13 are different viewpoints and different
14 conclusions and there's absolutely no doubt
15 about that.

16 But what we're going to base it on
17 is the -- and this has happened before, on the
18 independent scientists or on the scientists
19 who have concerns to consumers. And so as a
20 farmer group, because most of our members --
21 we have 8,000 members. Most of them are
22 farmers. We do represent our members. And

1 when we did the survey and discovered that in
2 fact there were lots of apple growers who were
3 saying I don't use antibiotics. And we'll
4 have a volunteer read some of those comments
5 later today who are saying I am organic and I
6 don't want organic to be part of this problem.
7 I want organic consumers to be able to trust
8 organics. And that is important.

9 And I think that that's more
10 important than anything else. You cannot
11 gamble with your customers, with your
12 consumers because they are the ones spending
13 \$30 billion because they trust it. If you
14 lose that, you lose everything. And I think
15 that's serious and that's not something to be
16 taken lightly. And that was my concern in my
17 testimony, is that I feel it is kind of
18 ridiculed. Consumers are important and we
19 can't lose sight of that.

20 CHAIRMAN STONE: Thank you,
21 Charlotte. Allyson Kelly to the podium and
22 Troy Aykan on deck.

1 MS. KELLY: Hello, my name is
2 Allyson Kelly. I'm the organic program
3 manager for the Hain Celestial Group.

4 We wish to offer our support for
5 the Handling Committee's proposal on other
6 ingredients. We also support the excellent
7 comments made on this topic by Gwendolyn Wyard
8 of the Organic Trade Association.

9 As organic program manager, it is
10 my responsibility to make sure that we
11 maintain all of the documentation required for
12 over 1,000 organic products and the thousands
13 of ingredients that we use. We have a whole
14 team of people who spend virtually all of
15 their time obtaining documents from ingredient
16 suppliers and new documents have to be
17 obtained every 12 to 18 months, even if
18 nothing has changed.

19 To add to that, at inspection time
20 the inspectors want to see hard copies of all
21 of this documentation, which I spend hours and
22 days and weeks compiling and sending out to

1 more than two dozen of our certified
2 facilities a year. We've killed more trees
3 than Mount Saint Helens when it exploded and
4 the ingredient suppliers are sick of filling
5 out all of these documents. We welcome the
6 recommendations by Mr. McEvoy encouraging
7 sound and sensible practices that will
8 hopefully lighten these paperwork
9 requirements.

10 We use many ingredients that are
11 on Section 605 and 606 of the National List.
12 The companies that make these ingredients do
13 about 99 percent of their business with
14 conventional food companies. Because our
15 order quantities are relatively small, one of
16 our greatest challenges is sourcing
17 ingredients that meet this National List
18 criteria, such as non-GMO, no radiation, no
19 sewage sludge and additional requirements
20 described in the annotations.

21 The Handling Committee proposal
22 describes the possible stipulation that

1 agricultural other ingredients be organically
2 produced. We strongly urge the Board to not
3 require that these incidental additives be
4 organic. They are using extremely small
5 quantities, therefore their use will not
6 increase or organic production.

7 More importantly, many suppliers
8 will not add inventories of organic
9 ingredients that are used in such small
10 quantities and they will create entirely
11 separate products for the comparatively tiny
12 organic trade. While we understand and
13 support the desire to promote the use of
14 organic ingredients, the majority of
15 ingredients suppliers will not do it and this
16 will make it even more difficult to source the
17 ingredients that we need.

18 We would also like to make a
19 comment on the Committee proposal that
20 describes special questions to assess the
21 role, essentiality and viability of
22 alternatives to the other ingredients in a

1 substance. Before the Board makes any
2 decisions regarding the role or essentiality
3 of other ingredients or viable alternatives,
4 we strongly request that during the review
5 process, the Board should get input from all
6 stakeholders, especially ingredient
7 manufacturers. On the ingredient suppliers
8 have the in-depth knowledge of their own
9 manufacturing processes and the needs of their
10 customers to do this assessment.

11 The comments I'm making do not
12 require structural changes to the Committee
13 proposal. They pertain to how the Board
14 implements the policy. We strongly support
15 the Committee proposal. The proposal is
16 sound, thorough and practical and it provides
17 for input from all stakeholders. Thank you.

18 CHAIRMAN STONE: Thank you,
19 Allyson. Questions for Allyson? Thank you
20 very much.

21 MS. KELLY: Thank you.

22 CHAIRMAN STONE: Troy Aykan to the

1 podium and Zareb Herman on deck.

2 MR. AYKAN: Okay. Good morning.
3 My name is Troy Aykan. I'm a food scientist
4 and a lawyer. I am legal counsel for the
5 intellectual group for the regulatory and on
6 my spare time I teach food laws and
7 regulations at Cal Poly Pomona and Chapman
8 University since 2002. I will also be
9 teaching the same class at Chapman University
10 School of Law later this year.

11 I will be addressing the Board on
12 the topic of other ingredients. OFPA requires
13 that other ingredients be evaluated as a part
14 of the consideration of substances for
15 inclusion on the National List. The law
16 expressly states that the NOSB shall work with
17 manufacturers of substances considered for
18 inclusion on the proposed National List to
19 obtain a complete list of ingredients and
20 submit to NOP, along with the proposed
21 National List listing or any proposed
22 amendments to such list, the results of the

1 Board's evaluation and the evaluation of the
2 Technical Advisory Panel of all substances
3 considered for inclusion on the National List.

4 There is no mention of the word
5 ingredient or single ingredient in the law
6 governing National List or the NOSB. The OFPA
7 does not require other ingredients to be
8 separately listed on the National List. There
9 is no requirement or restriction against use
10 of other ingredients other than following the
11 law which prescribes technical review,
12 evaluations, public comments, voting and power
13 to amend. Therefore, there's no requirement
14 that other ingredients be petitioned
15 separately in the law or regulations.

16 The other ingredients occur at
17 insignificant levels in finished products and
18 may be considered as incidental additives.
19 Historically, other ingredients have been
20 reviewed as a part of the technical reports
21 and by the NOSB, and they are subject to
22 public comments and NOSB vote.

1 We strongly support the current
2 Handling Committee proposal. It's quite
3 rigorous and it fully complies with the
4 requirements of the OFPA and the regulations.
5 Other ingredients will be reviewed as part of
6 new petitions and they will be reviewed during
7 the sunset review of all substances currently
8 on the National List. This process is
9 transparent and allows for input from all
10 stakeholders. Therefore, petitions are
11 totally unnecessary as well as totally
12 impractical. It would be impossible to
13 process petitions for every possible other
14 ingredient. We urge the Board to approve the
15 Handling Committee proposal. Thank you. Any
16 questions, please?

17 CHAIRMAN STONE: Thank you.
18 Questions? Thank you very much.

19 MR. AYKAN: Thank you.

20 CHAIRMAN STONE: Zareb to the
21 podium and Trace Tipton on deck.

22 MR. HERMAN: Good morning. My

1 name is Zareb Herman. I am a nutritionist and
2 food scientist with the Hain Celestial Group.
3 I am here to support the Handling Committee
4 proposal on other ingredients.

5 In the early 1970s my family grew
6 organic apricots in Southern California. Back
7 then, we didn't call crops organic, but we
8 wanted to grow fruit the natural way without
9 chemical pesticides. I've been involved in
10 natural and organic foods for most of my life,
11 managing a natural food store, doing research
12 on citrus trees and for the last 21 years I've
13 been doing R&D and regulatory for an organic
14 food manufacturer.

15 Last month I was speaking with two
16 former NOSB members at the Natural Products
17 Expo in Anaheim, California. We were
18 lamenting that until a few years ago NOSB
19 meetings which much less polarized and more
20 reasonable. People had differences of
21 opinion, but we could generally compromise and
22 work things out so the organic industry could

1 keep growing. It may be unrealistic in this
2 age of politics, but I hope that we can return
3 to this former approach, because after all we
4 should all share the goal of increasing the
5 use of organic foods and growing the industry.

6 This brings me to the Committee
7 proposal on other ingredients. The proposal
8 provides for a thorough review of other
9 ingredients during the petition process and
10 during each sunset review. If anyone objects
11 to any ingredient, they can submit written and
12 oral comments to their heart's desire.

13 This brings me to the suggestion
14 by some that every single ancillary substance
15 must go through the petition process. Do we
16 really want to go through the petition process
17 for every incidental additive? This process
18 would take so long, we will all be dead or
19 wish we were dead before it could happen.

20 And as stated by others, we do not
21 have the resources to do it and it is
22 unnecessary because the current proposal more

1 than allows for public comment and debate.

2 Let's look at the consequences of
3 requiring petitions. Over 50 percent of
4 organic sales are for processed organic foods.
5 Almost all of these products require
6 substances from the National List for their
7 production and many of these substances
8 require other ingredients. The petition
9 process would get so bogged down that these
10 other ingredients would never get approved and
11 without them there will be no flavors, colors,
12 enzymes, microorganisms, yeast, vitamins,
13 minerals and many other substances. Without
14 these substances, companies will not be able
15 to manufacture most processed organic foods.
16 The entire organic industry will be devastated
17 and thousands of organic farms will likely
18 revert to conventional agriculture resulting
19 in increased use of chemical pesticides,
20 herbicides and fertilizers.

21 For these reasons I strongly urge
22 you to support the Committee proposal. Thank

1 you.

2 CHAIRMAN STONE: Thank you.

3 Questions? All right. Thank you very much.

4 Trace Tipton to the podium and, it will sound

5 different when she says it because I say it

6 slow, Lindsay Fernandez-Salvadore on deck.

7 MR. TIPTON: Good morning. My

8 name is Trace Tipton. I do regulatory affairs

9 for Suterra just over the hill here in Bend,

10 Oregon. My comments are actually related to

11 the review of other ingredients for crop

12 inputs, not necessarily with the handling

13 section of it, but I appreciate you giving me

14 a couple minutes to present this. I have

15 submitted written comments to the NOSB Board

16 and NOP throughout the years and I've never

17 had the chance to speak to you at this type of

18 venue, but I thank you for coming to Oregon.

19 I'll be brief today. My comments

20 are just about the replacement of the 7 CFR

21 205.601 exemptions for inerts that are

22 currently based on the old U.S. EPA List 4,

1 and in the case of passive pheromone products,
2 List 3 ingredients. The mechanics of the NOP
3 exemptions are surely in need of an update as
4 the U.S. EPA lists have not been updated for
5 several years now.

6 To start I'd like to thank past
7 and present NOSB and NOP decision makers for
8 their level-headed treatment of pheromone-
9 based products. From the earlier days with
10 the use of pheromones just in insect/pest
11 traps and monitoring lures and the integration
12 of these with temperature records, degree-
13 days, pest control models to today the use of
14 pheromones in actual pest control products we
15 have seen that the benefit has been
16 tremendous. Anybody familiar with the pome
17 fruit industry can attest to the benefits of
18 disrupting the normal mating cycle of that
19 proverbial worm in the apple, the codling
20 moth.

21 These pest products have been
22 available to organic growers for many years

1 based on the old EPA lists. In some cases the
2 substances in question are things that are
3 sitting all over the room here. Cellulose
4 paper for your coffee cup, polyethylene
5 materials for dispensers. Folks are drinking
6 their morning coffee in cups and lids that are
7 made out of these same materials. These
8 materials do not contaminate organic crops,
9 they do not leave harmful residues and they
10 are completely compatible with organic farming
11 practices. They're necessary for the
12 economical application of pheromones in the
13 field.

14 And during your upcoming
15 deliberations about them, I'd only ask that
16 you please keep in mind that many of them are
17 ubiquitous in the world around us, have
18 already undergone extensive EPA review in
19 order to be placed on EPA's List 4 initially.
20 And in the case of the List 3s for passive
21 pheromone hand-applied products only, they
22 simply do not come into significant contact

1 with organic materials when used according to
2 their labeling.

3 The benefits of continued use of
4 these other ingredients clearly outweigh any
5 hazard or risk and the continued exemptions
6 for them will allow organic growers to
7 continue to benefit from the use of pheromone
8 active ingredients in the field. Thank you.

9 CHAIRMAN STONE: Thank you for
10 taking time to be here and submitting written
11 comments and tracking our work so we can get
12 your input. We appreciate that.

13 Question?

14 Very good. Thank you very much
15 for taking time to be here.

16 So, Lindsay, if you'll state your
17 name so they hear the non-Kentucky version,
18 and we'll go from there.

19 MS. FERNANDEZ-SALVADORE: And
20 accent, too. Good morning. My name is
21 Lindsay Fernandez-Salvadore with OMRI.

22 (Laughter.)

1 MS. FERNANDEZ-SALVADORE: And I am
2 the program director at OMRI. I really think
3 today that my comments will be quick and
4 painless in comparison to what you were
5 hearing yesterday. I'm commenting on the
6 proposal on ancillary substances, or formerly
7 known as other ingredients. We are pleased
8 with the changes made to the recommendation
9 that Zea presented. For the most part they
10 clarify the confusions that we had about the
11 intent of the document.

12 We understand now that if the
13 proposal is adopted by the full NOSB today
14 that we should wait for further guidance from
15 the NOP on how OMRI as a material review
16 organization should proceed when reviewing
17 processing ingredients that may contain
18 ancillary substances. In the meantime, we
19 will continue with our current procedure that
20 we have established and published for the
21 review of such ancillary substances.

22 Overall we find the recommendation

1 to be clear and the revised procedures will
2 lead the NOSB through this complex subject in
3 a structured, transparent manner. We will be
4 happy to provide comments on ancillary
5 substances as each 205.605 and 606 material
6 comes onto the docket. And we will also look
7 forward to bidding for the supplementary
8 technical reviews. Yay.

9 And so thank you for your hard
10 work on this proposal. See, painless?

11 CHAIRMAN STONE: Good. Great.
12 Thanks. Question?

13 Great. Thank you very much.
14 Thanks for all your --

15 MR. FELDMAN: I have a question.
16 Sorry.

17 CHAIRMAN STONE: Oh, I'm sorry,
18 Jay.

19 MEMBER FELDMAN: Thank you. Thank
20 you, Lindsay. I'm trying to reconcile the
21 role of the MROs with the role of the NOSB on
22 this. I mean it was suggested earlier by

1 Charlotte that the certifiers play maybe more
2 of role. I mean you're waiting for guidance
3 from NOP, but how does that square with the
4 Board's responsibility to ensure that the
5 materials that are in certified organic
6 products are in compliance with OFPA and are
7 reviewed by the Board and put on the National
8 List, or at least held to the National List
9 criteria?

10 MS. FERNANDEZ-SALVADORE: It
11 doesn't. I would say that there's two
12 separate processes. So whatever you decide on
13 today is one procedure, and I'm sure that will
14 guide the NOP on their further guidance.

15 MEMBER FELDMAN: And what about
16 Charlotte's point that if we create a negative
17 annotation as opposed to an annotation that
18 specifies allowed ingredients, if we were to
19 go that route, that we're creating competitive
20 disadvantage for the original petitioner so
21 that new petitioners can come in with
22 replacement ingredients that are not

1 prohibited by the annotation and fill that
2 part of the market?

3 MS. FERNANDEZ-SALVADORE: I really
4 can't comment on Charlotte's comments. I just
5 can't answer that question. I'm sorry.

6 MEMBER FELDMAN: Well, what if I
7 were to propose that we have a negative
8 annotation? Could manufacturers come in and
9 use that approved listing with other
10 ingredients? Would you as an MRO allow other
11 ingredients that were not specifically
12 prohibited?

13 MS. FERNANDEZ-SALVADORE: If that
14 was the guidance from the NOP, yes. But
15 again, the NOP hasn't provided that guidance
16 and I understand that this is not what we as
17 an MRO are supposed to do with this proposal,
18 that the NOP will provide that guidance.

19 MEMBER FELDMAN: Thank you.

20 MS. FERNANDEZ-SALVADORE: Thanks.

21 CHAIRMAN STONE: Thanks, Lindsay.

22 Thanks for all your support for the organic

1 industry.

2 That concludes the public comment
3 for the Handling Committee. We're just about
4 10 minutes behind. Not bad. We have a lot to
5 do before lunch so that we have plenty of time
6 for robust discussion after lunch, so be in
7 your seats, Board Members and audience, please
8 promptly at five after 10:00.

9 (Whereupon, the above-entitled
10 matter went off the record at 9:55 a.m. and
11 resumed at 10:09 a.m.)

12 CHAIRMAN STONE: Board's going to
13 go back in session. So I think the Handling
14 Committee is prepared to work through a
15 discussion and vote on four materials, I
16 believe, John?

17 MEMBER FOSTER: Yes.

18 CHAIRMAN STONE: And we plan to
19 put ancillary substances to the after lunch
20 session. So the motion or recommendation is
21 on the table if anyone will -- John will get
22 it up and I think Joe may be leading the first

1 one. And Michelle can put sulfuric acid up on
2 the screen, please. So I'll turn to over to
3 John.

4 MEMBER FOSTER: All right. Well,
5 I guess it's my turn to figure out how to
6 delay just a moment until Joe gets back.

7 All right. So we have the
8 proposal up on the screen. We made no changes
9 to it in the interim, but I do want to make
10 sure we follow through on opportunities to
11 have discussion beyond clarification on the
12 material.

13 So you all heard the summary of
14 proposed action on sulfuric acid.

15 MEMBER DICKSON: Was a motion
16 made?

17 MEMBER FOSTER: A motion has not
18 yet been made. I was hoping you might be able
19 to do that.

20 MEMBER DICKSON: I would like to
21 move to accept the Committee -- or, I'm sorry,
22 we're classifying first. I move to classify

1 sulfuric acid as a synthetic substance.

2 MEMBER FOSTER: Is there a second?

3 MEMBER AUSTIN: I'll second that.

4 MEMBER FOSTER: Thank you, Harold.

5 Before I ask for further discussion, I want to
6 ask on materials what we want to do with
7 declaration of interests. Anyone have a
8 declaration of interest they'd like to make at
9 the present time? Zea?

10 MEMBER SONNABEND: I do work for a
11 certifier who may or may not in the future
12 allow products with any materials that we vote
13 onto the National List.

14 MEMBER FOSTER: Mac?

15 CHAIRMAN STONE: And just to be
16 clear this is for each of these four
17 materials, not just sulfuric acid. We'll get
18 that on the table.

19 MEMBER SONNABEND: Not to mention
20 other ingredients maybe in some of the
21 certified products.

22 MEMBER FOSTER: Thank you for

1 mentioning that. Are there any other
2 declarations that need to be made here?

3 I'll go ahead and say our
4 company's farming operation doesn't use it,
5 but I imagine at least one the suppliers we
6 work with, it's likely someone would intend on
7 using it.

8 Okay. That's it for declarations.
9 So now do we have further discussion on the
10 classification motion for sulfuric acid?

11 All right. Hearing none, then I
12 think we can proceed to a vote.

13 CHAIRMAN STONE: Okay. The voting
14 will begin with Carmella.

15 MEMBER BECK: Yes.

16 MEMBER SONNABEND: No.

17 MEMBER FELDMAN: This is the
18 synthetic.

19 MEMBER SONNABEND: Oh, the
20 synthetic? Sorry. Yes, synthetic.

21 MEMBER FELDMAN: Yes.

22 MEMBER RICHARDSON: Yes.

1 MEMBER DICKSON: Yes.

2 MEMBER FOSTER: Yes.

3 MEMBER WALKER: Yes.

4 MEMBER FULWIDER: Yes.

5 MEMBER AUSTIN: Yes.

6 MEMBER TAYLOR: Yes.

7 MEMBER MARAVELL: Yes.

8 MEMBER THICKE: Yes.

9 MEMBER BONDERA: Yes.

10 MEMBER FAVRE: Yes.

11 CHAIRMAN STONE: Chair votes yes.

12 MEMBER FOSTER: Thank you. Do we
13 have a motion for listing of sulfuric acid?

14 MEMBER DICKSON: I move to accept
15 the Committee's recommendation to add sulfuric
16 acid to 205.605(b).

17 MEMBER FOSTER: Do we have a
18 second?

19 MEMBER RICHARDSON: Second.

20 MEMBER FOSTER: Thank you, Jean.
21 Further discussion?

22 CHAIRMAN STONE: Just to clarify,

1 Francis, remind you that the motions are
2 always made in the positive.

3 MEMBER FOSTER: All right. Back
4 to further discussion.

5 All right. Hearing none, then we
6 proceed to vote.

7 CHAIRMAN STONE: Okay. The voting
8 will begin with Zea.

9 MEMBER SONNABEND: No.

10 MEMBER FELDMAN: No.

11 MEMBER RICHARDSON: No.

12 MEMBER DICKSON: No.

13 MEMBER FOSTER: No.

14 MEMBER WALKER: No.

15 MEMBER FULWIDER: No.

16 MEMBER AUSTIN: No.

17 MEMBER TAYLOR: No.

18 MEMBER MARAVELL: No.

19 MEMBER THICKE: No.

20 MEMBER BONDERA: No.

21 MEMBER FAVRE: No.

22 MEMBER BECK: No.

1 CHAIRMAN STONE: No.

2 MEMBER FOSTER: How did we come
3 out?

4 CHAIRMAN STONE: Vote was
5 unanimous.

6 MEMBER WALKER: Yes.

7 MEMBER FOSTER: All right. Next
8 item up is barley beta fiber. Michelle, could
9 we have the proposal up?

10 All right. I will make a motion
11 to classify barley beta fiber as petitioned as
12 agricultural. Is there a second?

13 MEMBER RICHARDSON: Second.

14 MEMBER FOSTER: Thank you, Jean.
15 Further discussion on barley beta fiber? Zea?

16 MEMBER SONNABEND: Okay. I'll
17 start the discussion. I originally abstained
18 on this coming out of Committee because I
19 wanted to hear from the public comments that
20 came in from manufacturers who felt that this
21 was actually needed in organic products
22 because I don't feel like I personally can

1 judge whether something is needed or not in an
2 organic product. And so I have trouble with
3 most of the 606 items.

4 The fact that we heard no
5 companies submit testimony that they needed
6 this in their organic product has made we
7 decide to vote no on this material. Aside
8 from other questions that I do have about its
9 appropriateness and availability of other
10 alternatives, it seems clear that there are
11 other alternatives since nobody really
12 requested it.

13 MEMBER FOSTER: Thank you, Zea.
14 More discussion?

15 All right. Then I think we can
16 proceed to vote then on the listing motion.
17 I'm sorry, yes, on classification.

18 CHAIRMAN STONE: Voting will begin
19 with Jay.

20 MEMBER FELDMAN: Yes.

21 MEMBER RICHARDSON: Yes.

22 MEMBER DICKSON: Yes.

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MEMBER FOSTER: Yes.
MEMBER WALKER: Yes.
MEMBER FULWIDER: Yes.
MEMBER AUSTIN: Yes.
MEMBER TAYLOR: Yes.
MEMBER MARAVELL: Yes.
MEMBER THICKE: Yes.
MEMBER BONDERA: Yes.
MEMBER FAVRE: Yes.
MEMBER BECK: Yes.
MEMBER SONNABEND: Yes.
CHAIRMAN STONE: Chair votes yes.
Vote was 15-0, unanimous.
MEMBER FOSTER: Moving on to a
listing motion, I would move to list barley
beta fiber as petitioned at 205.606. Is
there --
MEMBER RICHARDSON: I second that.
MEMBER FOSTER: Oh, thank you,
Jean. Further discussion on the listing
motion?
Okay. Surprisingly, I guess to

1 me, no discussion. We'll proceed to vote
2 then.

3 CHAIRMAN STONE: The voting to --
4 I'll just try to get a little more thorough in
5 my delivery here.

6 MEMBER FOSTER: This is to list
7 barley beta fiber as petitioned at 205.606.

8 CHAIRMAN STONE: Good. Voting
9 will begin with Jean.

10 MEMBER RICHARDSON: No.

11 MEMBER DICKSON: No.

12 MEMBER FOSTER: Yes.

13 MEMBER WALKER: No.

14 MEMBER FULWIDER: No.

15 MEMBER AUSTIN: Yes.

16 MEMBER TAYLOR: No.

17 MEMBER MARAVELL: No.

18 MEMBER THICKE: No.

19 MEMBER BONDERA: No.

20 MEMBER FAVRE: No.

21 MEMBER BECK: Yes.

22 MEMBER SONNABEND: No.

1 MEMBER FELDMAN: No.

2 CHAIRMAN STONE: No. Three yes,
3 twelve no. Motion fails.

4 MEMBER FOSTER: All right. Moving
5 onto sugar beet fiber. Thank you, Michelle.
6 First we'll do classification motion. I would
7 move to classify sugar beet fiber as
8 petitioned as agricultural.

9 MEMBER BONDERA: I'll second that.

10 CHAIRMAN STONE: Thank you,
11 Colehour. Any discussion on the
12 classification motion?

13 Seeing none, we can proceed to
14 vote.

15 CHAIRMAN STONE: The voting will
16 begin with Joe.

17 MEMBER DICKSON: Yes.

18 MEMBER FOSTER: Yes.

19 MEMBER WALKER: Yes.

20 MEMBER FULWIDER: Yes.

21 MEMBER AUSTIN: Yes.

22 MEMBER TAYLOR: Yes.

1 MEMBER MARAVELL: Yes.

2 MEMBER THICKE: Yes.

3 MEMBER BONDERA: Yes.

4 MEMBER FAVRE: Yes.

5 MEMBER BECK: Yes.

6 MEMBER SONNABEND: Yes.

7 MEMBER FELDMAN: Yes.

8 MEMBER RICHARDSON: Yes.

9 CHAIRMAN STONE: Yes. Fifteen

10 yes, no nos.

11 MEMBER FOSTER: All right. We'll
12 move onto the listing motion for sugar beet
13 fiber. I would move to list sugar beet fiber
14 as petitioned on 205.606. Is there a second?

15 MEMBER FAVRE: Second.

16 MEMBER FOSTER: Thank you.

17 Further discussion on the listing motion?

18 Zea?

19 MEMBER SONNABEND: The exact same
20 comment I said for the barley beta fiber
21 applies to this. I was curious to see if
22 anyone really wanted this in their organic

1 products and so I abstained, but the comments
2 came in that made it clear that there does not
3 seem to be a demand for it. And there are
4 some troubling issues that arise from approval
5 of this, and so I have decided to vote no.

6 MEMBER FOSTER: More discussion on
7 this item?

8 I would just ask could you get in
9 what are the troubling issues, you know, that
10 you just mentioned?

11 MEMBER SONNABEND: Yes. The fact
12 that in order to assure that there's no GMOs
13 it pretty much confines us to product only
14 from Sweden, and I think that puts a real
15 hardship on certifiers. You know, there's
16 just no way that any domestic sugar beet fiber
17 would not be potentially GMO, and so it's sort
18 of favoring this one manufacturer. And there
19 seem to be plenty of alternatives, or we would
20 have heard from people about why this was the
21 only type of fiber that they would possibly
22 need.

1 So those are the two main factors,
2 although considering, you know, if they find
3 a way to grow sugar beets organically, then
4 maybe it would be appropriate I guess, but
5 otherwise no.

6 MEMBER FOSTER: Okay. Thank you.
7 More discussion? Oh, Colehour?

8 MEMBER BONDERA: Thank you. You
9 know, I don't serve on the Handling Committee,
10 but in my review and reflection on the
11 essentiality and the compatibility, I can't
12 comfortably -- besides this whole relatively
13 large GMO question in my mind, sorry, I have
14 a difficult time supporting it even before or
15 independent of the testimony.

16 MEMBER FOSTER: Thanks. All
17 right. I just want to reiterate I do have
18 faith in the certification system to make sure
19 that if genetic engineering is involved it's
20 going to be excluded. So I just want to get
21 that out there. It sounds like there's some
22 either confusion or doubt about that. I just

1 want to say I don't doubt that, so I have
2 confidence in that system.

3 Also, perhaps this isn't the best
4 example of it, but part of the discussion we
5 had was around the use of agricultural
6 byproducts, and I want to say that in this --
7 like I said, this may not be the best example
8 of it, but in general I want to recognize that
9 I think most of us, if not all of us in the
10 Subcommittee, were wanting to at least
11 recognize the value of trying to find uses for
12 agricultural food and ag byproducts, and this
13 is one. It may not be the best example, but
14 in general we supported that and look for
15 ways, you know, to find opportunities to use
16 that.

17 So that was kind of the last item
18 in the discussions that we had in the
19 Subcommittee that I wanted to get out in this
20 record.

21 All right. Any last tidbits?

22 Then we'll proceed to vote.

1 CHAIRMAN STONE: The voting begins
2 with John.

3 MEMBER FOSTER: No.

4 MEMBER WALKER: No.

5 MEMBER FULWIDER: No.

6 MEMBER AUSTIN: No.

7 MEMBER TAYLOR: No.

8 MEMBER MARAVELL: No.

9 MEMBER THICKE: No.

10 MEMBER BONDERA: No.

11 MEMBER FAVRE: No.

12 MEMBER BECK: No.

13 MEMBER SONNABEND: No.

14 MEMBER FELDMAN: No.

15 MEMBER RICHARDSON: No.

16 MEMBER DICKSON: No.

17 CHAIRMAN STONE: And no. So all
18 nos and zero yeses.

19 MEMBER FOSTER: All right. Last
20 of the materials in front of us today on the
21 Handling Committee is DBDMH. I'll go ahead
22 with a classification motion. Move to

1 classify 1,3-Dibromo-5,5-Dimethylhydantoin as
2 petitioned as synthetic.

3 MEMBER AUSTIN: Second that.

4 MEMBER FOSTER: Thank you, Harold.

5 Any discussion on the classification motion?

6 Seeing none, then we can proceed
7 to vote.

8 CHAIRMAN STONE: Voting begin with
9 Calvin.

10 MEMBER WALKER: Yes.

11 MEMBER FULWIDER: Yes.

12 MEMBER AUSTIN: Yes.

13 MEMBER TAYLOR: Yes.

14 MEMBER MARAVELL: Yes.

15 MEMBER THICKE: Yes.

16 MEMBER BONDERA: Yes.

17 MEMBER FAVRE: Yes.

18 MEMBER BECK: Yes.

19 MEMBER SONNABEND: Yes.

20 MEMBER FELDMAN: Yes.

21 MEMBER RICHARDSON: Yes.

22 MEMBER DICKSON: Yes.

1 MEMBER FOSTER: Yes.

2 CHAIRMAN STONE: Yes. Unanimous
3 yes.

4 MEMBER FOSTER: We'll move on to
5 listing motion. I move to list 1,3-Dibromo-
6 5,5-Dimethylhydantoin as petitioned on Section
7 205.605(b) of the National List. Is there a
8 second?

9 MEMBER RICHARDSON: Second.

10 MEMBER FOSTER: Thank you, Jean.
11 Further discussion on this?

12 All right. Then we can proceed to
13 vote.

14 CHAIRMAN STONE: Voting begins
15 with Wendy.

16 MEMBER FULWIDER: No.

17 MEMBER AUSTIN: No.

18 MEMBER TAYLOR: No.

19 MEMBER MARAVELL: No.

20 MEMBER THICKE: No.

21 MEMBER BONDERA: No.

22 MEMBER FAVRE: No.

1 MEMBER BECK: No.

2 MEMBER SONNABEND: No.

3 MEMBER FELDMAN: No.

4 MEMBER RICHARDSON: No.

5 MEMBER DICKSON: No.

6 MEMBER FOSTER: No.

7 MEMBER WALKER: No.

8 CHAIRMAN STONE: And no.

9 Unanimous, 15 nos. Motion fails.

10 MEMBER FOSTER: Moving onto last
11 item on our Subcommittee agenda for this
12 morning then is the ancillary substances-other
13 ingredients proposal. Do we have a motion?
14 Ah, my mistake. I think we were thinking
15 about pushing off the voting to that in the
16 afternoon.

17 MEMBER SONNABEND: Okay. I hadn't
18 necessarily heard that. Why?

19 MEMBER FOSTER: My expectation
20 based on the comments was that we would want
21 further discussion. There's room on the
22 agenda to first deliberate that. If we don't

1 need it, that's okay.

2 MEMBER SONNABEND: Don't you think
3 we should discuss it now and then if things
4 come up that we have to revise then push the
5 vote back to this afternoon? Because if we
6 don't discuss it now, we're going to be
7 really, you know, starting over.

8 MEMBER FOSTER: Let's discuss it.

9 CHAIRMAN STONE: And right now
10 we're about 30 minutes ahead of where we
11 thought we might be, so I think we can spend
12 a little time discussing.

13 MEMBER SONNABEND: And so to that
14 end, John, I don't know if you want to put a
15 motion on the floor before we start discussing
16 it or not, but it's up to you.

17 MEMBER FOSTER: I think if we can
18 do it, let's just do it in discussion. It
19 could get muddier faster if we have a motion
20 on the floor.

21 CHAIRMAN STONE: The Chair
22 respects that.

1 MEMBER FOSTER: Excellent. So if
2 you want to start the discussion, that would
3 be great.

4 Would any of the other Board
5 Members like to discuss the proposal in front
6 of us? Nick?

7 MEMBER MARAVELL: Yes, I want to
8 say that I think this is a very important
9 issue and they've made a considerable amount
10 of progress in addressing I'm going to just
11 say other ingredients because I get too
12 confused with what I'm reading and what we're
13 saying, but I would like to suggest some
14 clarifications and perhaps some shortening to
15 our policy that I don't think is at all
16 substantive and would make it easier for
17 future boards to understand.

18 So in that light, and I'm going to
19 ask Zea if she considers these quote/unquote
20 "friendly." I would definitely like to add
21 the words "reviewed to OFPA standards" just so
22 that we don't have to answer that question

1 anymore. In the very beginning where it says
2 "It will be our policy to review all other
3 ingredients," I would -- I don't even know if
4 I'm looking at the most recent version of it
5 in my book, but the very first -- now I got to
6 find it. Yes, right under the heading it says
7 "Policy." The NOSB --

8 MEMBER SONNABEND: Okay. Could I
9 just ask -- Michelle has it up and could
10 you --

11 MEMBER MARAVELL: Sure.

12 MEMBER SONNABEND: -- point and --

13 MEMBER MARAVELL: On page 199 in
14 my book at the very bottom there's the
15 heading, subheading called "Policy." The very
16 first sentence at the top of the screen, it
17 says, "The NOSB intends to review," and I
18 would add the words "to OFPA standards," "OFPA
19 criteria." I would take anything that the
20 Committee or the Board wants to put in there.
21 "Other ingredients found, et cetera, et
22 cetera." But I'm tired of answering the

1 question and I think that future Boards can
2 see our intent very clearly there.

3 I'm going to make another --

4 MEMBER SONNABEND: Can --

5 MEMBER MARAVELL: Yes?

6 MEMBER SONNABEND: Can I just make
7 sure Michelle has that change, because
8 Michelle is going to have to keep the firm
9 version of the document.

10 MEMBER MARAVELL: Okay. And then
11 perhaps I should just ask, does anyone have a
12 particular word they want to see there? OFPA
13 standards? OFPA criteria? Do you want to
14 cite the statute? I want it to be crystal
15 clear. Does anyone have any thoughts on that?

16 CHAIRMAN STONE: Jay?

17 MEMBER FELDMAN: I would say "in
18 accordance with OFPA criteria."

19 MEMBER MARAVELL: Okay. I'm fine
20 with that. I just want to make it clear.

21 MEMBER SONNABEND: Okay.

22 Michelle, adding "in accordance with OFPA

1 criteria" to the first sentence under "Policy"
2 at the end, does that work for you?

3 MEMBER MARAVELL: Then a second
4 concern that I have is -- just to shorten this
5 a little bit would be to take the section that
6 lists the categories we know are going to have
7 a lot of other ingredients in it. And we're
8 not really giving policy on that. We're just
9 saying, hey, guys, we got to look at these.
10 I would be willing to put that in an appendix
11 just so we can sort of shorten our policy.

12 MEMBER SONNABEND: I'm not sure
13 I'm following you, Nick. Can you tell us what
14 page and where you want to add or take out
15 language?

16 MEMBER MARAVELL: Okay. I'm
17 sorry. Yes, I'm sorry. Okay. Page 201 in
18 your book. "The following listings in 205.605
19 are classes of substances that are known to
20 require the use of other ingredients." That's
21 sort of a factual statement. "These are
22 recommended for careful review during the

1 sunset period." We're going to do that.
2 We're highlighting this for ourselves, future
3 boards and to the Program, but I don't feel
4 that we need to have that in our policy
5 section. It could be in our appendix or move
6 out of the policy. And I'm doing that in the
7 interest -- I'm trying to have us focus on the
8 most essential portions of the policy when we
9 vote. I don't feel that this is a policy
10 statement so much as it is just flagging
11 things that we're going to be doing anyway.

12 So, but I'd love to hear from the
13 rest of the Board on that.

14 CHAIRMAN STONE: Harold?

15 MEMBER AUSTIN: I'm going to take
16 the other side of the equation on that one,
17 Nick, and throw something at me if you totally
18 disagree, but I think looking at the
19 complexity of what we do and the processes
20 that we all try to get engaged with, that I
21 think something like this is stuck in there
22 for the boards and the members that follow

1 behind us. Actually, I think it's a good
2 component to have there just because it's
3 there. I mean, as they read through this
4 document, it's black and white. It's very
5 visible to where they're not going to have to
6 look some place else in the regs or the rules
7 to find these. It puts it right there in
8 plain sight. Just my thought.

9 MEMBER MARAVELL: Right. I don't
10 feel strongly about this. I'm just saying
11 it's not what I would consider to be high
12 policy and if want to, you know -- and that it
13 would still remain in this document. I'm not
14 suggesting that it leave the document. That's
15 all. It's a minor point. I'm trying to boil
16 this down to if I have to explain this policy
17 to stakeholders that I don't have to go
18 through that list as part of the explanation.
19 That's all. But, you know, so a minor point,
20 but I'd love to hear yet additional comment if
21 there is any.

22 CHAIRMAN STONE: To me it's under

1 the procedure, not policy. So there is a
2 separate subheading there. Jean?

3 MEMBER RICHARDSON: Yes, I think I
4 would leave it just where it is. It really
5 illustrates what's being discussed in the
6 policy and it is in the procedural section.
7 And there's always a tendency for items that
8 go into the appendices to be lost in the
9 discussion, so I'd leave it where it is.

10 CHAIRMAN STONE: Zea?

11 MEMBER SONNABEND: Well, I just
12 would like to ask Miles or the Department; I
13 saw you mumbling over there between each
14 other --

15 (Laughter.)

16 MEMBER SONNABEND: -- if you have
17 a reaction to this.

18 MR. McEVOY: Yes, we were just
19 discussing whether or not it was appropriate
20 to be amending the proposal without a motion
21 on the floor. So the proposal that was
22 submitted by the Subcommittee for

1 consideration -- well, first there was the
2 published proposal and then you amended that
3 when you presented the proposal. Was that
4 this morning? Boy, it all blends together
5 after awhile.

6 (Laughter.)

7 MR. McEVOY: And so, we just want
8 to be clear what you're doing here. And it
9 sounds like you're discussing some changes.
10 And if you're going to make those change to
11 what you proposed this morning, then you have
12 to clarify that when you finally get to the
13 motion.

14 MEMBER SONNABEND: Well, the
15 motion would be for the amended proposal, but
16 I am no parliamentarian, so whoever wants to
17 decide that, it's fine.

18 CHAIRMAN STONE: Yes, the fear
19 here is we get into amending amendments and
20 that type of thing, so I would like to modify
21 the document and then approve as modified.
22 But if we need to have a motion and second and

1 then we agree on one amendment, I think that
2 would be the cleanest for the record.

3 MEMBER SONNABEND: Well, Nick's
4 first amendment to add OFPA criteria, there
5 was agreement. But this one I'm hearing some
6 disagreement, so that would have to be a
7 formal amendment then.

8 MEMBER MARAVELL: I don't consider
9 any of these amendments. I'm just considering
10 this discussion points for us to consider
11 right now and sort of a forewarning that this
12 could lead to an amendment of the document.
13 And I agree totally with what Miles said, we
14 are not amending this right now. We're
15 showing the public what our deliberation
16 process is. Is that okay?

17 MR. MCEVOY: That's fine.

18 MEMBER MARAVELL: I would just
19 like though to clarify then, are we seeing the
20 policy section different in terms of its
21 impact from the procedure section in terms of
22 our recommendation? That's just a

1 clarification question. In other words, do
2 they both carry the same weight? Because if
3 they don't, then I've got other suggestions,
4 because I think they both need to carry the
5 same weight.

6 MEMBER FELDMAN: Yes, I agree they
7 need to carry the same weight. I mean you're
8 talking about transparency, right?

9 MEMBER MARAVELL: Absolutely.

10 MEMBER FELDMAN: So that when
11 someone reads this policy, it's not in the
12 background discussion. It is the policy.

13 MEMBER MARAVELL: Zea, how do you
14 see it?

15 MEMBER SONNABEND: I don't
16 understand. It's a recommendation. It
17 carries the same impact, both parts of it. I
18 guess I don't understand.

19 MEMBER MARAVELL: Okay. Well,
20 it's just semantics then. I thought I heard
21 something saying, well, it's not in the policy
22 section, it's in the procedure section, and I

1 don't know if that made any difference that
2 we're only adopting the policy and we're not
3 adopting a procedures. But if it's all
4 equal --

5 MEMBER SONNABEND: That wasn't me.

6 MEMBER MARAVELL: Yes, yes. If
7 it's all equal, then, yes, that's fine.
8 That's fine.

9 CHAIRMAN STONE: Is there other
10 discussion, other clarifications that Board
11 Members might have? Jay?

12 MEMBER FELDMAN: I'm trying to
13 figure out the definition of other
14 ingredients. Not being a part of the
15 Committee makes it a little difficult, and as
16 you know from our pre-meeting, I've been
17 through this document several times. But you
18 know, there's some reference to incidental
19 ingredients as defined by FDA in the document.
20 There's reference to processing aids. There
21 are referenced ingredients within ingredients.
22 There are references to single ingredients and

1 multiple ingredients. And at this point my
2 head is a little spinning around. But is
3 there a clear definition section that
4 identifies exactly what we're talking about?
5 Is everybody clear on that?

6 Because we have the section of
7 base criteria and we have a section of other
8 criteria, but do we need to start with base
9 criteria that's defined under another statute,
10 or do we need to start with all other
11 ancillary ingredients that are used in the
12 production of materials that are being
13 petitioned? Why isn't it that simple? And
14 when we talk about ancillary ingredients, why
15 isn't it as simple as processing aids and
16 other ingredients that are used for purposes
17 of formulation for whatever reason?

18 I get a little worried when we
19 start referencing FDA and GRAS and incidental
20 ingredients because as you all know, as we've
21 talked about in the past, the standards that
22 govern those statutes or other statutes we

1 typically reference are -- not that we can't
2 use them and incorporate them, but unless it's
3 really clear that we independent of those
4 statutes are defining the universe of
5 ingredients, I feel may we may leave some out
6 and then we have further problems down the
7 road.

8 So am I missing something here? I
9 have a few other questions.

10 CHAIRMAN STONE: John?

11 MEMBER FOSTER: I know in the past
12 NOSB has been I believe directed by NOP to
13 consider ingredient. I think it's pulled from
14 the FDA definition of ingredient; any
15 substance used in the preparation of an
16 agricultural product that is still present in
17 the final commercial product as consumed. And
18 I kind of recall and I've been informed that's
19 an accurate recollection is that there was
20 some direction to do that. And that's
21 consistent with the heading of 605.606 I
22 think.

1 MEMBER FELDMAN: Could I ask you a
2 question at this point?

3 MEMBER FOSTER: Sure.

4 MEMBER FELDMAN: I don't want to
5 interrupt, but just is there anything in OFPA
6 that talks about functional or technical
7 effect as is referenced in FDA, FFDCA? And
8 along the same lines is there anything in OFPA
9 that talks about insignificant as is
10 referenced in FFDCA? I mean the reason OFPA
11 exists is because those other statutes were
12 different.

13 I mean I don't want to denigrate
14 those other statutes; they have valuable
15 purpose, but the OFPA standard was intended to
16 be somewhat different and create a market that
17 differentiated itself from the conventional
18 market. And if we fall back on conventional
19 definitions of insignificant and functional
20 technical effect, then how are we different?
21 How is this organic label differentiated? and
22 over time, you know, to me that becomes

1 problematic.

2 So you're citing FDA. And when
3 you do that, please help me by explaining how
4 that aligns with OFPA. That's what I was --

5 MS. FERNANDEZ-SALVADORE: Miles?

6 MR. McEVOY: Yes, I just wanted to
7 clarify why we used the term "other
8 ingredients." We purposely used that
9 terminology of "other ingredients" because we
10 didn't want to presume that the term
11 "incidental additives" would be all inclusive.
12 So what the intent of the memo from 2011 was
13 that we want the Board to look at all of these
14 ingredients within ingredients that are on we
15 specifically said 605 so that they're all
16 reviewed as part of the review process for any
17 substance that's being considered to be on
18 605. So that's why we used that term "other
19 ingredients." Because some of the things are
20 not ingredients, right? They're other
21 ingredients and processing aids, and
22 processing aids are not ingredients. So we

1 want to be inclusive, not restrictive.

2 And then the other point is that
3 if it's not included in the review and it's
4 not on the National List, then the substance
5 can't be allowed. So that's the purpose, is
6 to drill down deeper into these sub-
7 ingredients or ingredients within ingredients
8 to have a clear policy, clear recommendations
9 from the Board on those ancillary substances
10 and this universe of things.

11 CHAIRMAN STONE: So does this
12 definition do that? Does this cover that
13 world or sphere of --

14 MR. McEVOY: So the question is
15 whether the baseline criteria covers all those
16 different permutations? Was that the --

17 CHAIRMAN STONE: And item 1
18 through 4. Yes, that's the question.

19 MR. McEVOY: Well, I'd say we're
20 not exactly sure because we haven't analyzed
21 that in great detail, but it would be a
22 starting place of the universe of things that

1 are allowed in foods, because they have to
2 meet these baseline criteria to be allowed in
3 foods in the first place.

4 CHAIRMAN STONE: So this is a
5 recommendation and you hear our intent
6 associated with the recommendation. So at
7 this point when we -- be sure we're covered
8 here, Jay, that it's their job if it's lacking
9 in some way. They have the responsibility to
10 let us know that. Zea?

11 MEMBER SONNABEND: In my
12 perception the definition of ancillary
13 substances is the baseline criteria as a
14 starting place and then the five bullet points
15 where it says "Other ingredients have the
16 following characteristics," because just the
17 baseline criteria by themselves is everything
18 allowed in food whether it's a main ingredient
19 or not an ingredient. But to distinguish
20 between those things which we're calling
21 ancillary and those things which are main
22 ingredients are the bullet points, and all of

1 the bullet points characterize what
2 constitutes something being called ancillary.

3 MEMBER FELDMAN: Does that include
4 processing aids?

5 MEMBER SONNABEND: Yes.

6 MEMBER FELDMAN: That do not have
7 a functional or technical effect?

8 MEMBER SONNABEND: Yes. Well, it
9 includes ancillary substances within a
10 processing aid that's on the National List.
11 It doesn't include processing aids that were
12 used to produce the other ingredients, because
13 you can't even find that out.

14 CHAIRMAN STONE: Because they're
15 no longer in the product.

16 MEMBER SONNABEND: They're no
17 longer in the product and they're not on the
18 label as an ingredient of the other
19 ingredient.

20 (Laughter.)

21 MEMBER FELDMAN: I got that one, I
22 think.

1 (Laughter.)

2 CHAIRMAN STONE: Jay?

3 MEMBER FELDMAN: Just another
4 question is are we distinguishing here between
5 who actually is doing the processing? So if
6 I'm a certified handler and I'm doing the
7 processing, am I held to a different standard
8 than a non-certified handler who is doing the
9 processing?

10 MEMBER SONNABEND: Of what?

11 MEMBER FELDMAN: Of the other
12 ingredient, or of the ingredient that is
13 utilizing other ingredients in formulating its
14 end product. There's no distinction here
15 between certified handlers and non-certified
16 handlers, processors, that there was a
17 reference here to certified handlers.

18 MEMBER SONNABEND: I still don't
19 get it.

20 MEMBER FOSTER: No, I'm with Zea
21 on this one. It's not clear to me.

22 MEMBER FELDMAN: Is there such a

1 thing as certified handlers?

2 MEMBER FOSTER: Yes.

3 MEMBER FELDMAN: Processors?

4 MEMBER FOSTER: Yes.

5 MEMBER FELDMAN: Is there such a

6 thing as non-certified handlers?

7 MEMBER FOSTER: Yes.

8 MEMBER FELDMAN: Okay. Do
9 products from both those sources end up in
10 organic food?

11 MEMBER FOSTER: Sometimes.

12 MEMBER FELDMAN: Yes. Yes?

13 MEMBER FOSTER: Sometimes yes.

14 MEMBER FELDMAN: Yes or no?

15 Sometimes yes? Okay. Under this proposal are
16 the materials that end up in organic food,
17 certified food held to a different standard of
18 review when it comes to other ingredients if
19 it goes through the channel of certified
20 handler or if it goes through the channel of
21 non-certified handler?

22 MEMBER SONNABEND: Okay.

1 MEMBER FELDMAN: That's the
2 question. Sorry, I -- this is out of my
3 world.

4 MR. MCEVOY: This is --

5 MEMBER SONNABEND: Okay.

6 MR. MCEVOY: Can I answer that?

7 MEMBER SONNABEND: Miles, yes.

8 MR. MCEVOY: So any certified
9 organic handler goes through the same process
10 of verification that the final product meets
11 the requirements. And so if it's an organic
12 product --

13 MEMBER FELDMAN: Right.

14 MR. MCEVOY: -- all the
15 agricultural ingredients have to be organic
16 and verified that they are certified under the
17 requirements, unless it's a 606 material, and
18 then they could potentially use a non-organic
19 606 material if they have evidence that it's
20 not commercially available in organic form.

21 If it's a 605 material, then they
22 can use that in their formulation. It has to

1 be verified that it meets the requirements.
2 You know, those 605 materials are by
3 definition non-agricultural and so they would
4 not be coming from a certified organic source
5 because they're not an agricultural input. So
6 they're not coming from a certified organic
7 handler. They're just coming from some
8 supplier.

9 And the certifier needs to verify
10 that those 605 materials meet the
11 requirements. Just like on a farm any inputs
12 that are used in farm production, they need to
13 be reviewed and determined that they meet the
14 requirements, that they're either non-
15 synthetic or that they're a synthetic that's
16 on 601. So it's sort of the same review
17 process. So we don't have certified organic
18 fertilizer manufacturers, just like we don't
19 have certified organic suppliers of 605
20 materials. But there's still a verification
21 process to verify that all those inputs meet
22 the requirements.

1 MEMBER FELDMAN: And so under this
2 policy those inputs -- presumably some could
3 be other ingredients, right, would be reviewed
4 or held to the OFPA standards?

5 MR. McEVOY: All inputs are
6 reviewed. All ingredients are reviewed. So
7 whatever the requirements are that are under
8 605, including any annotations, the certifier
9 has to verify that those requirements are
10 being met.

11 MEMBER FELDMAN: Including the
12 other ingredients?

13 MR. McEVOY: If there are
14 annotations that reference other ingredients,
15 then yes.

16 MEMBER FELDMAN: Annotations in
17 the rule?

18 MR. McEVOY: Right.

19 MEMBER FELDMAN: On the National
20 List?

21 MR. McEVOY: Right, so there are
22 some 605 materials that have annotations and

1 that is part of the process that the certifier
2 goes to to verify that those substances --

3 MEMBER FELDMAN: So you're talking
4 about current policy?

5 MR. MCEVOY: Correct.

6 MEMBER FELDMAN: If it's not in
7 the annotation, it would not be reviewed by
8 the certifier currently?

9 MR. MCEVOY: Okay.

10 (Laughter.)

11 MEMBER SONNABEND: It's haphazard.

12 MR. MCEVOY: Yes, it's haphazard.
13 That's why we're asking for this policy from
14 the Board.

15 MEMBER FELDMAN: Right, but I'm
16 just trying to get the current situation.

17 MR. MCEVOY: Right.

18 MEMBER FELDMAN: So then to make
19 sure we fix that, this policy is intended to
20 fix the haphazardness of that problem?

21 MR. MCEVOY: Exactly.

22 MEMBER FELDMAN: Okay. Okay.

1 Thank you.

2 CHAIRMAN STONE: You good?

3 MEMBER FELDMAN: I'm going to take
4 a break.

5 (Laughter.)

6 CHAIRMAN STONE: All right.

7 Anybody else? Nick?

8 MEMBER MARAVELL: Yes, it looks
9 like we're the only fools here.

10 Okay. I need to seek some
11 clarification here in terms of -- we have a
12 section in this paper called "Recommendation."
13 We have another section called "Discussion."
14 Under "Discussion" we define other ingredients
15 and we define baseline criteria. Am I to
16 understand that the discussion portion carries
17 the same weight as the recommendation portion?
18 If that's correct, I am definitely going to
19 make a proposal that we change "discussion" to
20 -- start "recommendation" further up. I think
21 it needs to be very, very clear what we are
22 recommending here.

1 And then, so I'll entertain any
2 discussion on that and then I want to go back
3 to the five points.

4 CHAIRMAN STONE: So it's my
5 thought that the -- and I'll ask the Program
6 in a second, but this whole document is our
7 recommendation, not just the paragraphs under
8 the title "Recommendation." Certainly we
9 could move the term "recommendation" back up
10 the document to be inclusive if it's
11 necessary. I would think not, but I'll defer
12 to the Program.

13 MR. McEVOY: Yes, if you pass a
14 final recommendation, the whole document
15 becomes part of your final recommendation. So
16 in your final recommendations you usually have
17 a section that you call the recommendation,
18 but it's in the context of the full final
19 recommendation. So it's all part of the
20 record that we would then utilize to implement
21 any kind of either rulemaking or guidance that
22 would need to happen. So the whole thing is

1 the recommendation.

2 CHAIRMAN STONE: And I would add
3 that certifiers, when they look back at
4 recommendations and TRs and petitions, the
5 whole document is a reference document, not
6 just that section.

7 Did you have something else, Nick?

8 MEMBER MARAVELL: Yes, and this
9 follows on Jay's previous discussion. Hello,
10 Jay. Wake up. One of the five bullet points
11 is they are not added directly by the
12 certified handler. So I think Zea can explain
13 why that's an important provision to have
14 there, but it's somewhat of a confusing issue,
15 unless I'm the only one confused. Does anyone
16 else want that one explained?

17 CHAIRMAN STONE: It's my
18 understanding that if it's added directly,
19 then it goes on the ingredient panel, and this
20 is to address those that are not on the
21 ingredient panel.

22 MEMBER MARAVELL: And does the

1 words "by the certified handler" make a
2 difference? Why do we have to say by a
3 certified handler?

4 CHAIRMAN STONE: Because they're
5 the ones that verify that these other
6 ingredients have been reviewed at some point
7 in the process already, and that's partly what
8 we're cleaning up. But we have authority --
9 the certified handler has a requirement under
10 the regulation to do that, whereas to Jay's
11 point I think was if it's not a certified
12 handler, then they're outside of our purview.
13 And this gets into our purview. That's the
14 purpose of that.

15 MEMBER MARAVELL: Well, I'm going
16 back to Jay's point under 605; I assume not
17 under 606, but it could be, that there could
18 be materials, other ingredients coming from
19 non-certified handlers. Does that make a
20 difference and is there any way in which that
21 could cloud our transparency in reviewing all
22 of the materials and perhaps not recognize a

1 material that we would otherwise not want to
2 see in a final product?

3 CHAIRMAN STONE: If I understand
4 your question right, that's what we're trying
5 to do here. And this says that.

6 MEMBER MARAVELL: Well, that's
7 what I'm questioning, whether that says that.
8 You know, it may. And I'm showing my
9 ignorance here, but I'm, you know --

10 CHAIRMAN STONE: Well, you can
11 stop any time, if you want?

12 MEMBER MARAVELL: Well, yes.

13 (Laughter.)

14 MEMBER MARAVELL: Thank you, Mr.
15 Chair.

16 MEMBER BONDERA: No, I think I had
17 that question too of whether or not the word
18 "certified" needed to be struck. Modify that
19 or not.

20 MEMBER SONNABEND: Why would a
21 non-certified handler go through all this
22 trouble to sourcing stuff with -- look at

1 other ingredients? Certified handlers are the
2 end users of the results of this
3 recommendation, and so they're the ones who
4 are making their recipes and what they add for
5 -- you know, what is added directly by them is
6 a thing like an enzyme or a vitamin or a dairy
7 culture, and that's what they're adding
8 directly. Those are ingredients. But they
9 don't know in all cases that they're also
10 adding growth media, preservatives, whatever.
11 Those are the things we're going to review.

12 CHAIRMAN STONE: Yes, Jay?

13 MEMBER FELDMAN: Just for the
14 laypeople, the confusion comes in that we know
15 that we're accepting other ingredients into
16 food, processed food that we label organic,
17 and the organic consumer expects that there's
18 been some degree of review. So if we know
19 that's going on, we have to have some type of
20 methodology to assess whether the non-
21 certified handler whose product we end up
22 buying and utilizing in the processing of a

1 certified product -- that that non-certified
2 handler, whether he wants to be in the organic
3 stream of commerce or not, regardless of what
4 the intent is, his product or her product is
5 ending up in the final certified organic
6 product. And our consumers want to know that
7 that has been subject to some review.

8 So if this does that, that's fine.
9 But if it doesn't, then we need to -- just
10 even a parentheses, you know, that -- and in
11 a case where applicable, a non-certified --
12 you know, I mean --

13 CHAIRMAN STONE: John?

14 MEMBER FOSTER: So in the main
15 those ingredients have had that scrutiny.
16 That's it. I can't even tell you the
17 thousands of hours I spent reviewing
18 ingredients that certified operators were
19 putting into formulated products. Thousands
20 and thousands of hours. In the main that's
21 been happening in accordance with the
22 regulations.

1 What I think we're talking about
2 here is refining that, drilling down more.
3 But I don't want it to go out there that that
4 hasn't been done. That has been, the vast
5 majority. It's been a little inconsistent.
6 Like any new regulation there's going to be
7 inconsistencies. I think we're just trying
8 to, you know, refine that a little bit more.
9 But don't anyone mistake the fact that in the
10 main since 2002 this has been happening.
11 We're just getting better at it with this.

12 CHAIRMAN STONE: So like Flavor
13 says, without synthetic solvents some of these
14 have some clarifying annotations and some
15 don't. And that's what we're driving for.
16 But certifiers look at the regulations. They
17 look at recommendations. They look at TRs and
18 see what was in the TR. We defined it with
19 DHA and ARA. And in others it wasn't because
20 we don't do brand names. So this is a
21 refinement to do exactly what you're concerned
22 about. And the language I think says that.

1 MEMBER FELDMAN: And I realize
2 that and I appreciate the work that you guys
3 have done on this. This is an incredibly
4 important area and I think the consumers will
5 appreciate this. What I think may be helpful
6 as we move this forward is to identify in the
7 document where we think more work is needed,
8 where we think more Board work is needed. I'm
9 very uncomfortable handing over authority to,
10 you know, parties outside this Board without
11 adequate, you know, assurance that there's
12 compliance with the underlying OFPA standards
13 and the process.

14 And I said it earlier and we
15 didn't have a chance to discuss it, but just
16 the use of the word "insignificant" is
17 extremely troubling to me having worked in
18 chemical regulation for 30 years and having
19 seen us go through classical toxicological
20 reviews to inverse dose response curves with
21 exposure to endocrine disrupters where we
22 didn't conceive of this years ago where dose

1 no longer makes a poison but timing can affect
2 the life of an organism from its fetal stage
3 through the rest of its life. And we organic
4 are on the cutting edge of that.

5 So to throw in terms like
6 "insignificant" is very troubling to me. And
7 we've discussed this before as a Board. We
8 discussed this in Seattle in 2011. If that
9 term is going to be used in a document like
10 this, we really have to acknowledge as a Board
11 that we need to work on defining it.

12 CHAIRMAN STONE: I can appreciate
13 that. The way I read these bullets under
14 other ingredients, we're specifically stating
15 that items that are present in food at an
16 insignificant level have no technical function
17 of food are on the list of things to be
18 considered as other ingredients, not excluded
19 from. Zea?

20 MEMBER SONNABEND: This is the
21 definition simply of what we're going to
22 review. Then when we review them you can

1 decide if it's significant or functional or
2 not. But this is just the definition of what
3 constitutes another ingredient. And it has to
4 be all of these things together, not just any
5 one of them to constitute the definition. And
6 then we're going to, you know, look at how
7 much is -- you know or the relative
8 proportions or whatever. And then you can
9 decide as a Board Member if it's insignificant
10 or not.

11 CHAIRMAN STONE: Nick?

12 MEMBER MARAVELL: So, Zea, if we
13 said "other ingredients must have the
14 following characteristics," would that still
15 be a correct statement? Do we want them to
16 have all those characteristics? They have to
17 meet every --

18 MEMBER SONNABEND: That's
19 regulatory language, not definition language.
20 I mean we're defining. They have the
21 following characteristic.

22 MEMBER MARAVELL: Well definitions

1 need to be somewhat precise if I'm going to
2 vote to recommend them. I mean I need to know
3 -- well, just let me know, would that be an
4 inappropriate thing to say, they must have the
5 following characteristics? They must have all
6 of the following characteristics? I mean I'm
7 literally trying to understand, Zea. I'm not
8 trying to be critical here.

9 CHAIRMAN STONE: I don't see that
10 that changes anything, but --

11 MEMBER SONNABEND: I don't see it
12 as being a worthwhile change, no.

13 MEMBER MARAVELL: I don't see that
14 as an answer to my question either.

15 CHAIRMAN STONE: Miles?

16 MR. McEVOY: Yes, if you change it
17 to "must have the following characteristics,"
18 you're going to limit what you're going to be
19 able to review. You don't want to limit what
20 you want to include in this category, I don't
21 think. I don't think that's what I've heard
22 from the Subcommittee.

1 MEMBER FELDMAN: But you could
2 always use language like "must have but is not
3 limited to."

4 MR. McEVOY: You could do that.

5 CHAIRMAN STONE: If that helps,
6 I'm certainly -- be able -- Jean?

7 MEMBER RICHARDSON: To my way of
8 looking at it, the way it's phrased right now
9 is the correct way. It remains broad enough
10 to allow all the other ingredients to be
11 included in the pot. And that if we start
12 fiddling around with the language, we're just
13 going to make it more complicated than it need
14 to be. So I think we should just leave it the
15 way it is. "Other ingredients have the
16 following characteristics."

17 CHAIRMAN STONE: Tracy?

18 MEMBER FAVRE: Nick, explain to me
19 your concerns about it just saying "have the
20 following ingredients?"

21 MEMBER MARAVELL: It's not so much
22 that I have a concern. I'm trying to

1 understand it. And if you bear with me, I
2 used to draft regulations for a living, so
3 these things do make a difference. As Miles
4 has pointed out, he doesn't want to be limited
5 and we don't want to send the wrong message.
6 I'm just trying to understand. And as I said,
7 I'm going to show my ignorance here. I am
8 trying to understand.

9 CHAIRMAN STONE: Any other?
10 Colehour, did you have your hand up?

11 MEMBER BONDERA: Yes, I don't
12 know. I mean I could say in this discussion
13 that when Zea was commenting on it and she did
14 say it must have these following
15 characteristics that are on that list, I was
16 like, whoa, okay, it didn't say that when I
17 had first read it. And so it made me do a
18 double take to understand it. So I think that
19 -- from my perspective it would add clarity,
20 because that was a presumption. And then I
21 think it would just make it more defined.

22 CHAIRMAN STONE: Jay?

1 MEMBER FELDMAN: Miles, I need to
2 go back to something you said, and I wrote it
3 down here. And this may be under the current
4 policy. Maybe this is what we're trying to
5 address. "If it's not included in the review
6 and it's not on the National List, then it's
7 not allowed." Aren't we trying to get around
8 that somehow possibly with this policy, that
9 we're trying to figure out another mechanism
10 to ensure its review, ensure the public that
11 it has been subject to review of OFPA
12 standards, but not necessarily put it on the
13 List? That's my sense of what I'm hearing
14 about the end result of this policy.

15 CHAIRMAN STONE: Miles?

16 MR. McEVOY: Okay. So everything
17 that's an input or ingredient has to be in
18 compliance with the regulations, and there's
19 various criteria for that depending upon what
20 part of the agricultural system you're looking
21 at. Crops and livestock is different than
22 handling. We spelled that out in the memo on

1 this topic back in 2011.

2 For crops and livestock,
3 especially for crops, it's very clear on what
4 ingredients and ingredients within ingredients
5 are allowed and not allowed. For livestock
6 it's very good, not quite as good as crops,
7 but it's very clear on the ingredients and
8 ingredients within ingredients. The
9 excipients is very clear. And we tried to
10 clarify that in our final guidance on
11 livestock feed supplements just recently.

12 For handling, as we mentioned in
13 2011, it hasn't been systematically looked at
14 by the Board. It's been various levels of
15 review for the various substances on 605.
16 There is some guidance that the Board does
17 provide in their review and the technical
18 reports, and certifiers use that. And
19 certifiers ensure that everything that is in
20 a processed organic product is compliant with
21 the regulations. What we're looking for is
22 drilling down a little deeper into that area

1 to provide consistency on those ancillary
2 substances-other ingredients in 605 and now
3 606 materials.

4 So from the way that we see this
5 proposal, it's trying to then provide that
6 structure and policy of how the Board would
7 approach this larger issue of these other
8 ingredients.

9 MEMBER FELDMAN: But are you
10 saying that at the end of the day when all of
11 this is done and reviewed to -- in a perfect
12 world, I mean do we need to put these
13 materials that have been reviewed on the
14 National List, or can there be some other
15 mechanism that meets the standard?

16 MR. McEVOY: Right, any input in a
17 processed organic product has to be either an
18 organic agricultural ingredient or it has to
19 be on the National List. Right. So there's
20 various ways that that can happen. So you can
21 have individual ingredients, individual
22 materials on the National List or you can have

1 categories. So it all depends on how the
2 Board approaches this in the future. For
3 instance, for crops you have List 3 and List
4 4 inerts.

5 MEMBER FELDMAN: Right.

6 MR. McEVOY: So you don't have
7 individual ingredients. You have groups of
8 substances.

9 MEMBER FELDMAN: Right.

10 MR. McEVOY: For livestock you
11 have excipients. That's a group of
12 substances. And some of the other materials
13 are enzymes. That's a group of substances.
14 It's not an individual enzyme-by-enzyme-type
15 of thing. I would think that that would be
16 the way that the Board would continue to look
17 at listing substances as by categories. The
18 inerts project, you're looking at categories
19 of groups of substances.

20 MEMBER FELDMAN: Okay.

21 MR. McEVOY: So they're still on
22 the National List. There's still that

1 regulatory basis for allowing it, but it might
2 not be as individual as an individual CAS
3 number.

4 CHAIRMAN STONE: Okay. So I'm
5 going to bit of a time check here. I think we
6 can have -- over lunch we can have more
7 discussion, get more comfort, Nick, with those
8 of you, the crafters of the recommendation.
9 Before I just stop, are there other sections,
10 pages, paragraphs that someone -- or is this
11 sort of the last of our discussion that we
12 need to refine, or are there aspects of this
13 that are still hanging out there? Just kind
14 of gauging time later.

15 Okay. Great. Oh, Nick? Sorry.

16 MEMBER MARAVELL: Unfortunately
17 there are other aspects, but, you know, I'm
18 not sure that they can be productively
19 discussed here. So I'll try to do it at
20 lunch, et cetera, and see. It gets pretty
21 detailed.

22 CHAIRMAN STONE: Well, so, yes, if

1 you can work with Zea and John and those that
2 worked on this in Committee, then -- it does
3 get hairy, so we do have to figure out how to
4 work it in in time.

5 Okay. Well, thanks. So I've got
6 11:15. We'll move to the CACS Subcommittee
7 and I'll turn the program over to Joe.

8 MEMBER DICKSON: Thank you, Mac.
9 The CACC or the CACS has only one item on the
10 agenda for this meeting, our proposal on
11 calculating the percentage of organic
12 ingredients in multi-ingredient products. Dr.
13 Jean Richardson has led our work on that
14 recommendation and I would ask her to give us
15 an overview and some recommended changes that
16 the Committee has come up with.

17 MEMBER RICHARDSON: Thank you,
18 Joe. The purpose of the document that we
19 circulated and put out for public comment is
20 on determination of percentage of organic
21 ingredients in multi-ingredient products. And
22 we put this out in order to be able to provide

1 some assistance to the NOP in the development
2 of guidance for handlers and certifiers.

3 Consumers expect that labels on
4 multi-ingredient products that are sold as 100
5 percent organic or made with organic reflect
6 an accurate determination of percentage of
7 organic ingredients and all certifiers have
8 uniformly calculated such percentages.

9 And we had a discussion.
10 Documenters, you recall from last meeting,
11 sent out suggested changes and we got back
12 excellent comments from 14 different
13 organizations. We got responses from OTA,
14 MOSA, Cornucopia, Smucker Natural Foods, Wolf
15 DiMatteo, ACA, Beyond Pesticides, CCOF,
16 OneCert, OTCO, NOC, PCO, CROP and White Wave
17 Foods. There was a considerable consistency
18 amongst all of the people sending in
19 recommendations. Some suggested edits.
20 Others supported other organizations such as
21 supporting the OTA statements.

22 I'll fold my comments -- from the

1 people that sent in comments, I'll fold those
2 into the recommendations as I go through them.
3 And because we're asking for changes, this
4 guidance needs -- basically I have to sort of
5 read the recommendations into the record so
6 that it is clear where we're coming from.

7 So the first recommendation that
8 we had is to make a proposed regulatory
9 change. We propose to change the regulation
10 at 205.302(a), which in essence it says --
11 well, I'll just read it.

12 It says, "Calculating percentage
13 of organic of organically produced
14 ingredients. The percentage of all
15 organically produced ingredients in an
16 agricultural product sold, labeled, or
17 represented as "100 percent organic,"
18 "organic," or "made with organic (specified
19 ingredients or food group(s))," or that
20 include organic ingredients, must be
21 calculated by: (1) Dividing the total net
22 weight (excluding water and salt) of combined

1 organic ingredients at formulation by the
2 total weight (excluding water and salt) of the
3 finished product."

4 But we have made a change where it
5 will simply say "excluding water and salt of
6 all ingredients" instead of "the finished
7 product." So we'll be deleting the words "the
8 finished product" and inserting the phrase "of
9 all ingredients." And that's on the screen
10 now, yes.

11 Similarly, at No. 2, it says,
12 "Dividing the fluid volume of all organic
13 ingredients, excluding water and salt, by the
14 fluid volume of the finished" -- and we would
15 insert "all ingredients" and delete "the
16 finished product" -- "(excluding water and
17 salt) if the product and ingredients are
18 liquid. If the liquid product is identified
19 on the principal display panel or information
20 is being reconstituted from concentrates, the
21 calculation should be made on the basis of
22 single-strength concentration of" -- add the

1 word "all" -- "the ingredients." Delete "and
2 finished product."

3 At (3): "For products containing
4 organically produced ingredients in both solid
5 and liquid form, dividing the combined weight
6 of the solid ingredients and the weight of the
7 liquid ingredients, excluding water and salt
8 by the total weight, excluding water and salt
9 of" -- insert the word "all ingredients,"
10 delete the phrase "the finished product."

11 And (3)(b): "The percentage of
12 all organically produced ingredients in an
13 agricultural product must be rounded down to
14 the nearest whole number." No changes there.

15 It should be understood by those
16 of you that are not familiar with processing,
17 the language we're proposing here is in
18 essence what everybody's been doing for the
19 last 10 years. So it is reflecting the
20 reality of the situation and it also meets the
21 OFPA requirements.

22 Our second recommendation relates

1 to self-calculating forms. Section 205.302
2 states, "The percentage must be determined by
3 the handler who affixes the label on the
4 consumer package and verified by the
5 certifying agent of the handler. The handle
6 may use information provided by the certified
7 operation in determining the percentage."

8 What the Subcommittee proposes is
9 that handlers utilize a self-calculating form
10 of their own or utilize a form provided by
11 their certifier so that a more uniform method
12 of calculation is established. We're not
13 looking for absolute similarity, but for
14 uniformity. And based on the input that we
15 received from public comment, we add in the
16 sentence which is underlined in red. We add
17 back in the language "one standard NOP-
18 generated form is not required."

19 That language is also in the
20 discussion section of the document that was
21 circulated and published and it's simply being
22 repeated here in order that the NOP gets the

1 clear message that neither the NOSB nor the
2 community at large wants the NOP to generate
3 a form which everyone should require, but that
4 the form should reflect the type of certifying
5 organization that is providing the
6 certification to the handler/processor. And
7 that seems like a very reasonable suggestion
8 to me.

9 The salt-excluded, No. 3,
10 recommendation is that the CACS proposes that
11 the only salt excluded from the calculation is
12 sodium chloride. Potassium chloride listed on
13 205.605 and any item on the National List such
14 as magnesium chloride or magnesium sulfate
15 used as an ingredient shall be counted in the
16 organic calculation.

17 And those writing in to suggest
18 changes again recommended that we be sure to
19 add back into our recommendation to the NOP
20 language, which is in the discussion section,
21 which is on the screen right now and
22 underlined in red, which says, "Standard

1 practice is to require any additives such as
2 anti-caking agents added to the salt to be on
3 the National List at 205.605 or 205.606. If
4 salt containing an additive on the National
5 List is added to a certified product, the
6 additive cannot be excluded. Therefore, the
7 product may not be labeled as 100 percent
8 organic."

9 This language is the same as in
10 the discussion section, as I said, and is
11 added in in order that it is clear to the NOP
12 what the intent is of the NOSB and the
13 certifying community at large. And I
14 recommend that change.

15 Under recommendation No. 4, Water
16 Excluded. Water is excluded from the
17 percentage calculations, as you heard in my
18 first reading of the rule, and that CACS
19 proposes extensive detailed and clear NOP
20 guidance to drive consistency among handlers
21 and certifiers to determine how much water
22 should be excluded from certain multi-

1 ingredient formulations that include such
2 ingredients as chicken soup, soy milk, almond
3 milk, fruit juice, vegetable juice or ready-
4 to-drink teas.

5 There was some additional comments
6 from, let's see, OTCO, which I was going to
7 look at here. Yes, OTCO had some specific
8 recommendations with regards to clarification
9 here to the NOP. "When clarification and
10 detailed guidance is provided by the NOP, we
11 would like to see formal calculations being
12 based on strong science and current industry
13 practices. Calculations should be developed
14 from items like extracts, hydrosols and
15 flavors. If we can agree on a sensible
16 extract calculation, we can use this
17 calculation for a wide variety of ingredient
18 calculations which can then provide the buyer
19 of an ingredient with an accurate verification
20 of organic content.

21 "Additionally, standard
22 calculations for soy and almond milk-type

1 products would provide industry
2 standardization. We would also like to see
3 that strong science is able to be used
4 alongside the FDA standards of identity and
5 not just leave the exclusion of water to
6 outdated FDA regulations."

7 And in doing the research for this
8 we all recognize that the water excluded
9 sounds simple, but in actual fact it's
10 extremely complicated. And so we would
11 recommend to the NOP really detailed guidance
12 together with specific examples in detail on
13 their Web site that everyone can then access,
14 because at the present time there is a lack of
15 consistency among certifiers as to their
16 understanding of how this should be dealt
17 with.

18 Recommendation No. 5, Processed
19 Single Ingredients. Handlers or certifiers
20 may request specification sheets from
21 manufacturers of processed single ingredients
22 if they desire more verification that the

1 ingredient was not processed in a way there
2 would be remaining non-organic components in
3 the single ingredient product. And example of
4 such ingredients include oil, flour, sugar and
5 syrup.

6 I think this was broadly accepted
7 by everybody as being an important
8 recommendation. And again to urge
9 specification sheets, that was one of the
10 things that many of those who commented would
11 like to encourage more manufacturers to have,
12 which would make it much easier to do
13 calculations.

14 Under recommendation No. 6, the
15 single sentence that was put out for general
16 distribution is recommended to be deleted and
17 replaced by a longer explanation because it
18 was felt that the recommendation was too
19 abbreviated. And so we would delete the
20 sentence that says, "For multi-ingredient
21 ingredients such as chocolate chips where as
22 much as 5 percent of the ingredients may be

1 non-organic, the certifier must provide
2 documentation of claims that the organic
3 content is beyond 95 percent if requested by
4 another handler or certifier."

5 We would delete that and replace
6 it with something that is more explanatory.
7 And it would state as follows, as you could
8 see on the screen in red and underlined:
9 "Formulated multi-ingredient NOP-certified
10 products contain organic ingredients that are
11 either single ingredients or multi-ingredient
12 ingredients. For multi-ingredient products
13 added to the formula of another product such
14 as chocolate chips where as much as 5 percent
15 of the ingredients may be non-organic, the
16 actual organic content must be obtained if the
17 contributing content is above 70 percent
18 organic or 95 percent organic;" that obviously
19 is depending on the category, "otherwise the
20 ingredients should be calculated at either 95
21 percent organic or 70 percent organic,
22 depending on how the product is classified on

1 the certificate.

2 "And further, handlers must
3 provide certifiers with supporting
4 documentation that substantiates the organic
5 content claim of a multi-ingredient product
6 used in a production formulation submitted for
7 approval."

8 And this of course is all really
9 in essence part of the discussion that comes
10 before these recommendations, but I hope that
11 that clarifies for those that several of the
12 commenters including OTA, OneCert, OTCO and
13 Smucker Natural Foods, everyone was supportive
14 of putting in this type of expansion into the
15 recommendation to be sure that it is clearly
16 received by the NOP for the guidance that they
17 would then develop.

18 Recommendation 7, Organic Label
19 Versus Organic Content. As specified in
20 205.302, the organic content or the percentage
21 of a product is based on a percentage of
22 organic ingredients. Sanitizers and

1 processing aids are not ingredients, therefore
2 they should not impact the organic percentage
3 of a product. The use of a non-organic
4 processing aid prevents the single- ingredient
5 product from being labeled as 100 percent
6 organic, but when the product continues to
7 contain 100 percent organic ingredients and
8 can be calculated as such when it is
9 calculated into a multi-ingredient organic
10 product. There was universal agreement that
11 was appropriate.

12 Recommendation 8. Raw
13 agricultural and single-ingredient ingredients
14 can be assumed by handlers, manufacturers and
15 certifiers to contribute 100 percent organic
16 content in a multi-ingredient formulation even
17 if they are listed as quote/unquote "organic"
18 on a certificate except where it is clear that
19 the ingredient is significantly different from
20 the raw condition.

21 And No. 9, NOP Guidance. That is
22 obviously extremely important. The NOSB

1 recommends that the NOP establish and maintain
2 an easily accessible Web site with examples of
3 how to calculate percentage of organic
4 ingredients in multi-ingredient products and
5 related topics such how to determine when a
6 processing aid becomes an ingredient in
7 calculation and of course how to determine
8 excluded water. And again OTCO strongly urged
9 a good Web site where this kind of information
10 could be readily available.

11 This motion -- let's see, we
12 didn't actually approve the amendments, did
13 we? No? Okay.

14 The document which was circulated
15 to the public without these changes in red
16 that you're seeing today had been approved by
17 our Subcommittee seven yes, zero no, one
18 absent.

19 That concludes my presentation.

20 MEMBER DICKSON: At this point are
21 there any clarifying questions on the
22 presentation or the proposal from the Board?

1 Jay?

2 MEMBER FELDMAN: Yes, I'm trying
3 to understand the connection between the
4 calculation of ingredients and the labeling of
5 ingredients. And so do you expect that as a
6 result of this there will be more products in
7 the marketplace that can be labeled 100
8 percent organic?

9 MEMBER RICHARDSON: No, I don't
10 think that it will make any difference to the
11 use of the 100 percent organic category.
12 There's almost no formulated products that are
13 on the market in the 100 percent category.
14 And so I don't think this will make any
15 increase in that based on my experience as an
16 inspector and also from the research that I've
17 done, and from input from the certifiers.

18 MEMBER FELDMAN: Okay. And
19 everybody sort of concurs with that? Because
20 conceptually if there's no analysis of
21 certification of actual 100 percent
22 ingredients -- so in other words if you've got

1 a calculation in which the individual
2 ingredients are deemed 100 percent now under
3 this new calculation and you add them into a
4 multi-ingredient product, each individually
5 100 percent, does that multi-ingredient
6 product become 100 percent for labeling? Just
7 as a follow up, because that's my dilemma. I
8 don't quite get that part of it.

9 MEMBER RICHARDSON: That's where
10 the distinct difference has to be sort of
11 understood in the difference between labeling
12 as opposed to organic ingredient content of
13 the product. So while it may have 100 percent
14 organic ingredients for purposes of
15 calculation, the label will not make 100
16 percent organic claim. It will only be making
17 the organic claim.

18 MEMBER FELDMAN: And if you could
19 just finish that thought. Because?

20 MEMBER RICHARDSON: Because that's
21 how it's set up under OFPA.

22 MEMBER FELDMAN: Okay.

1 MEMBER FOSTER: The simplest way
2 to finish that is because there is a
3 difference in the regulation between
4 composition and labeling. And that's what we
5 were talking about on Monday.

6 MEMBER FELDMAN: Okay.

7 MEMBER FOSTER: Yes.

8 MEMBER FELDMAN: Thank you.

9 CHAIRMAN STONE: And this doesn't
10 change any of that. This just helps clarify
11 in that process of calculating, uniformity of
12 the calculation. This doesn't change any of
13 how it's already operating.

14 MEMBER DICKSON: Miles?

15 MR. McEVOY: Yes, I appreciate the
16 work on this topic. It's very important to
17 have clear guidance on how to calculate
18 organic ingredients. And I note that in the
19 water-excluded part on passing it back to the
20 NOP to determine these out-of-date standard of
21 identities in the water part, that's very
22 complicated, as you mentioned. From our

1 perspective it would be nice if the Board
2 continued to work on that particular topic,
3 rather than just leave it up to the Program to
4 make that determination.

5 Then the other comment is on I
6 think it's 6, Multi-Ingredient Ingredients.
7 I understand there's basically agreement on
8 that, the changes to the document and the
9 calculations there. I would just point out
10 that maybe is not completely in alignment with
11 the concept of sound and sensible. It's
12 pretty complicated. Well, it's more
13 complicated than a different approach. And
14 those kinds of things put additional burdens
15 on the smaller businesses that don't
16 necessarily have the same kind of resources to
17 get that information because they don't have
18 the leverage to get the information from their
19 ingredient suppliers. So just to point that
20 out that it can be more difficult for a
21 smaller bakery, for instance, to get that kind
22 of information about the percentage of the

1 ingredients for an organic or made-with-
2 organic product.

3 MEMBER DICKSON: Jean?

4 MEMBER RICHARDSON: Yes, while I
5 respectfully agree with you -- I mean, or --
6 no, yes, sort of, I think that it does put
7 somewhat of a burden on the processors. On
8 the other hand, I think it's important that
9 the NOP sends out a clear message to the
10 manufacturers of the multi-ingredient
11 ingredients that the processor has to buy that
12 they need to make -- they need to know that we
13 need to know all the things that are in the
14 multi-ingredient ingredients. I mean it goes
15 back to the other ingredients discussions and
16 Jay's concerns, is that it should be
17 relatively easy for the manufacturer of the
18 chocolate chips to provide the processor,
19 whether large or small, with that information
20 on a specification sheet.

21 The present situation is when you
22 go out and do inspections is that the

1 processor says, you know, I called the
2 manufacturer and he says I don't have time to
3 give you those specification sheets. So if
4 the NOP sends out a message we expect those
5 specification sheets and information to be
6 available, then that will help reduce the
7 paperwork from both small and large processors
8 over the next few years.

9 MEMBER DICKSON: Understood.

10 MR. McEVOY: And just to make --

11 MEMBER DICKSON: Go ahead, Miles.

12 Sorry. I just had a clarifying question that
13 I just want to make sure I understand No. 6
14 correctly. It's only requiring additional
15 documentation in a case where the manufacturer
16 wants to take credit for more than 95 percent.
17 Without that documentation 95 percent is still
18 assumed.

19 MEMBER RICHARDSON: Yes, 95
20 percent would still be the default.

21 MEMBER DICKSON: Thank you.

22 MR. McEVOY: Yes, I understand

1 your point. It's a point well taken. Thanks.

2 MEMBER DICKSON: And, Miles, on
3 your earlier comment on the water exclusion,
4 do I hear you suggesting that we sort of hold
5 onto that piece of the recommendation and
6 perhaps your market for future committee work?

7 MR. McEVOY: Yes, exactly, that
8 the proposal is great and that particular
9 piece is complicated. And this is a great
10 forum to work out those difficulties rather
11 than just leave it to the Program to determine
12 what is the appropriate percentage of water
13 that you include or don't include in these
14 reconstituted products, because there's a lot
15 of opinions about it. There's a lot of
16 different products out there and this would be
17 a good forum to have that discussion and work
18 out what is the appropriate way to calculate
19 those types of ingredients.

20 MEMBER DICKSON: Thank you. Any
21 other questions from the Board?

22 So a quick comment to those of you

1 out there in the audience from all the
2 certifying agencies that have sent us in so
3 many other comments. Obviously as soon as
4 you'd like to start sending us stuff on water,
5 feel free to do so.

6 MEMBER DICKSON: Thanks. Mac,
7 that concludes our presentation of this
8 recommendation.

9 CHAIRMAN STONE: Thanks, Joe and
10 Jean.

11 We have three people that signed
12 up for public comment specifically to this
13 session and several others that Michelle very
14 graciously worked with to work them into the
15 agenda. They couldn't be here other days.
16 But several of these had not signed in when we
17 came back after the break. So I believe Mary
18 Mann. I believe Mary is here.

19 As you make your way to the
20 podium, let me call out these other names
21 right quick. Gautami Makam. If you're here,
22 raise your hand and John will help watch.

1 Aurelie Lawrence, Donald Stroub, Raymond
2 Brown, Carol Ann Merchant, Sherry Lingerfelt,
3 Stephen Bennett, and Mary Essex.

4 Okay. So we have Ms. Mary Mann.
5 And if you weren't here, just to be sure you
6 understand, there's the little stop light
7 mechanism there. The green light will be on
8 for three minutes, the yellow for one, and the
9 red you will stop when it goes off. Thank
10 you.

11 MS. MANN: Good morning. My name
12 is Mary Mann. I'm an Oregon resident. I'm a
13 mother, hopefully a future grandmother and I'm
14 deeply concerned about the health of my
15 family. We just welcomed 5 new babies into
16 the family in the last 18 months. I'm an
17 elected official. I'm a business owner. I'm
18 a consumer. I'm in total denial I'm a senior
19 citizen.

20 (Laughter.)

21 MS. MANN: I'm a member of the
22 Cornucopia Institute and here today as a

1 citizen lobbyist and I have volunteered to
2 help present testimony which I am concerned
3 about the use of antibiotics in organic
4 apples. I am a consumer and I was totally
5 stunned, even as informed as I thought I was,
6 that antibiotics were even used in sprays.
7 And these are critical in human medicine and
8 are used in organic agriculture. I'd like to
9 see organics be part of the solution and not
10 part of the problem. Consumer union polling
11 data shows that I am not the only one who
12 believes this, who believes apples or pears
13 treated with antibiotics should not be sold as
14 organic.

15 Cornucopia conducted a survey to
16 find out if it was possible to grow apples
17 with antibiotics. I'd like to read some of
18 the comments from apple growers. They could
19 not be at this meeting, but their voice is
20 just as important as the apple growers who are
21 here to give testimony. So here are a few
22 verbatim comments to the words who returned

1 this survey.

2 From an apple grower in New York
3 State: "I do not get it. Antibiotics are not
4 natural, so why should they be used in the
5 allowance of organic production? If you
6 cannot grow organic apples with antibiotics,
7 you should not be growing organic apples. I
8 love how the rules get bent when they are not
9 convenient."

10 From an apple grower in Eastern
11 Washington: "If antibiotics are prohibited,
12 I think I would be affected positively as
13 antibiotics are detrimental to the explanation
14 of organic."

15 From an apple grower in Western
16 Washington: "These antibiotic should be
17 banned now and not later."

18 From an apple grower in
19 California: "We would be very delighted if
20 antibiotics were prohibited for use in organic
21 apples and pears. This will mean safer
22 cleaner food for our customers, not to mention

1 healthier."

2 And finally from Barry Flamm. This
3 is not part of the survey. He was a former
4 NOSB chair, an organic fruit grower in
5 Montana. "Materials that pose human health
6 and environmental risk must not be used in
7 organic production. Tetracycline is such a
8 material and its use in organic crop
9 production should not be allowed to continue.
10 For many years I believe it has been clear
11 that the National Organic Standard Board's
12 intent to remove antibiotics from the National
13 List for fire blight control in apples and
14 pears."

15 And as that last note about the
16 five new babies in the family, their parents
17 are busy, busy people and I will share with
18 you their very literal -- it's all they can do
19 now to think about making sure that their
20 babies are safe. And prior to that they
21 probably ate convenience foods and all of a
22 sudden they're highly aware of what's going

1 on. And when something says organic baby food
2 that's putting in their baby, they want to
3 know that 100 percent of that pear juice or
4 that pear puree is organic. Thank you very
5 much.

6 CHAIRMAN STONE: Thank you. Any
7 questions?

8 Okay. Thank you. Joe, before I
9 clarify for the vote; sort of make an
10 executive decision here, but we have two
11 categories and two winners of the public
12 speaking timing. So I have Ms. Goldie
13 Caughlan, who stopped the second that the red
14 light came on.

15 So you get your choice between the
16 cup or the water bottle.

17 (Laughter.)

18 (Applause.)

19 CHAIRMAN STONE: And Terry
20 Shistar, you get the one that Goldie doesn't
21 take for stopping. The timing was perfect
22 when you stopped already. So thank you both

1 for respecting the time of your -- so thank
2 you.

3 (Applause.)

4 CHAIRMAN STONE: So, Joe, are we
5 ready?

6 MEMBER DICKSON: Yes, I believe
7 we're ready to proceed with voting, if anyone
8 has a motion to make.

9 MEMBER RICHARDSON: Do you want me
10 to read the entire thing again? No? I make
11 a motion that we accept the recommendations as
12 written together with the amendments that were
13 put forward this morning at this meeting.

14 MEMBER DICKSON: Is there a
15 second?

16 MEMBER FAVRE: Second.

17 MEMBER WALKER: Second.

18 MEMBER DICKSON: I think Tracy won
19 that. Is there discussion on the motion?
20 Jay?

21 MEMBER FELDMAN: Does anybody feel
22 like I do, that it would be helpful to put

1 into the document a clause that said 100
2 percent organic only for the purpose of
3 calculating the organic percentage of multi-
4 ingredient so that there is no confusion over
5 how this gets used for purposes of labeling?

6 MEMBER DICKSON: Jean?

7 MEMBER RICHARDSON: I did propose
8 that very language change, Jay, when were
9 discussing it on the conference call and I
10 believe it was Emily that said that such an
11 addition was not necessary because it was
12 fully covered under OFPA.

13 MEMBER DICKSON: And, Michelle,
14 would you scroll back up to No. 7 on there
15 just so we all can see it?

16 I mean my reading of the language
17 in No. 7 also underscores that this doesn't
18 impact the labeling claim around 100 percent
19 organic.

20 MEMBER FELDMAN: Because, you
21 know, I would propose as a friendly amendment
22 if it was acceptable to folks, if it

1 reinforces existing law and is not at odds
2 with or contradictory to -- I don't -- you
3 know, but I'm not going to pursue it unless
4 there's support for that.

5 MEMBER DICKSON: I feel like
6 because it was the earlier advice of the
7 Program not to make that redundant language,
8 I'd like to ask the Program if they have an
9 opinion on that question today.

10 MR. McEVOY: Yes, it looks like
11 it's covered very clearly in 7, that it says
12 specifically, "The product continues to
13 contain 100 percent organic ingredients and
14 can be calculated as such when it is
15 calculated into a multi-ingredient ingredient
16 product. But before that the use of a non-
17 organic processing aid prevents the single-
18 ingredient product from being labeled as 100
19 percent organic."

20 MEMBER FELDMAN: But the multi --

21 MR. McEVOY: So that seems to be
22 saying the same thing that you're saying, Jay.

1 MEMBER FELDMAN: Is it? Does that
2 refer to multi-ingredients as well?

3 MR. McEVOY: Does that what?

4 MEMBER FELDMAN: Refer to multi-
5 ingredient products, with that clause you just
6 read.

7 MR. McEVOY: Well, that is
8 specifically about single ingredients. A
9 multi-ingredient product could also not be
10 labeled as 100 percent organic until it
11 contained 100 percent organic-labeled
12 ingredients as all the labeled ingredients.

13 MEMBER FELDMAN: I think so. I
14 hope so. Thank you.

15 MEMBER DICKSON: Harold?

16 MEMBER AUSTIN: I guess a people
17 of question, too, regarding No. 4, since the
18 Program would actually like us to take that
19 back and continue to work on that, would we
20 want to pass it with the verbiage that we
21 currently have in it now, or would we want to
22 modify that?

1 MEMBER RICHARDSON: No, I would
2 like NOP to give us some extensive guidance on
3 it, personally.

4 (Laughter.)

5 MEMBER DICKSON: I mean I imagine
6 that if we left that language as it is, the
7 Program would perhaps ask us in the
8 communication for elaboration on that point,
9 or does it matter?

10 MR. McEVOY: Yes, it's possible.
11 It's kind of up to your Subcommittee whether
12 or not you want to work on this in terms of
13 your workplan, that particular part of the
14 calculation. We will certainly work on this
15 if it's passed to provide further instruction
16 to certifiers about how to do the
17 calculations.

18 MEMBER DICKSON: But you wouldn't
19 see an issue if we left No. 4 in and then did
20 some more work on it?

21 MR. McEVOY: That would not be an
22 issue, no.

1 MEMBER DICKSON: Okay. Thank you.

2 Other questions or comments from

3 the Board?

4 (No audible response.)

5 MEMBER DICKSON: Well, shall we

6 vote?

7 CHAIRMAN STONE: Voting begins

8 with Harold.

9 MEMBER AUSTIN: Yes.

10 MEMBER TAYLOR: Yes.

11 MEMBER MARAVELL: Yes.

12 MEMBER THICKE: Yes.

13 MEMBER BONDERA: Yes.

14 MEMBER FAVRE: Yes.

15 MEMBER BECK: Yes.

16 MEMBER SONNABEND: Yes.

17 MEMBER FELDMAN: Yes.

18 MEMBER RICHARDSON: Yes.

19 MEMBER DICKSON: Yes.

20 MEMBER FOSTER: Yes.

21 MEMBER WALKER: Yes.

22 MEMBER FULWIDER: Yes.

1 CHAIRMAN STONE: Yes. Vote was
2 unanimous and approval of the recommendation.

3 We have just a few minutes before
4 12:00. Did a lot of great work this morning.
5 We have one, two, three, four, five, six
6 topics to work on after lunch and a brief
7 update on the Inerts Working Group, I believe.
8 So it's been hard to get in and out, so we'll
9 still take the hour and 15 minutes and come
10 back at 1:15, which is a little more than an
11 hour and 15 minutes. Thank you.

12 (Whereupon, the hearing was
13 recessed at 11:53 a.m. to reconvene at 1:15
14 p.m.)

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A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N

1:17 p.m.

CHAIRMAN STONE: I'm going to call the meeting back in session.

(Whereupon, the bugle call "First Call" was played.)

(Laughter.)

CHAIRMAN STONE: All right.

(Applause.)

CHAIRMAN STONE: You're making me homesick, Francis. That's good. And you just carry that everywhere you go, I guess, huh? Very good.

Okay. I think we're going to work back through. We have five materials, no four materials and two recommendations, if I got that right. No, four and one. So no particular order, but just sort of the way they are on the sheet here.

I'm going to turn it over to Tracy and I think we'll work through the pet food amino acids, unless Michelle's telling me

1 something different.

2 MS. ARSENAULT: You want to do
3 that first?

4 CHAIRMAN STONE: Oh, yes, let's do
5 the Inerts Working Group. Thank you,
6 Michelle. Yes, let's do the Inerts Working
7 Group just so we can get back in the flow
8 here. Thanks, Lisa.

9 DR. BRINES: All right. Thank
10 you. And Michelle's got me on a timer, so
11 let's see how I do.

12 (Laughter.)

13 DR. BRINES: So the purpose of
14 this brief update is to inform the Board and
15 the public here at the meeting on progress
16 since the last time on this work that the
17 Board and the Program and the EPA is doing,
18 collaborating on updating our approach to
19 inert ingredients.

20 Okay. So we have two NOSB members
21 in this working group who are both absent from
22 the table right now. I'd like to recognize

1 Jay and Zea as part of the working group.
2 From the Program it's myself and Emily Brown-
3 Rosen and two members from EPA that are
4 assisting with this work, Chris Pfeifer in the
5 Biopesticides and the Pollution Prevention
6 Division and Kerry Leifer, who works
7 specifically on inerts issues with the EPA.

8 So as brief background, the
9 Organic Foods Production Act indicates that
10 the National List may provide for the use of
11 inerts in pesticides that are not classified
12 by EPA as inerts of toxicological concern. We
13 do have definitions for inert ingredients in
14 the NOP regulations, which are essentially
15 adopted from EPA's definition in FIFRA.

16 So terminology can be confusing.
17 Inert doesn't necessarily mean chemically or
18 biologically inert in the same way that
19 nitrogen is an inert gas, but we're working
20 with regulatory definitions from EPA.

21 Okay. So the rule on inerts
22 currently. Inerts are listed in several

1 sections of the National List. So List 4
2 inert ingredients were previously considered
3 by EPA as inerts of minimal concern. This
4 includes synthetic inert ingredients that were
5 previously classified by EPA as either List 4A
6 or List 4B. These inerts are currently
7 allowed in pesticide products used by organic
8 crop producers and organic livestock
9 producers. So they appear twice on the
10 National List at Section 205.601 for crop
11 production and also at 205.603 for livestock
12 production. In addition to the allowances for
13 List 4 inerts there's also a limited use of
14 List 3 inerts, and those inerts are allowed
15 only in passive pheromone dispensers. And the
16 citation is on the slide.

17 Okay. So what is the issue? So
18 as we heard in public testimony earlier today,
19 is that this list of inerts is no longer
20 maintained by EPA. The last update to the
21 List as published is actually 2004. So in
22 2006, EPA completed their reassessment of

1 these inert ingredients.

2 So instead of using this
3 Classification List 1 through 4, which is sort
4 of grouping them according to toxicology and
5 their use pattern pesticides is that they have
6 moved the allowances for those inerts into
7 their actual EPA regulation. So if you go to
8 4 C.F.R., Part 180, which is the EPA
9 regulations, they've either established
10 tolerances or tolerance exemptions for these
11 inert ingredients that are currently allowed
12 for use.

13 So we here at the NOP are still
14 operating under that obsolete list of inerts
15 because of the way our regulations are citing
16 that old EPA list. And so in the interim,
17 since that last update was done, we received
18 a number of petitions for inerts that are not
19 on that old EPA list but that might be allowed
20 by EPA in products as exempt from a tolerance,
21 or that are just allowed and may be better
22 than some of the things that are on our list.

1 So at the last meeting in
2 Providence the NOSB issued a recommendation on
3 policies and procedures for review of inert
4 ingredients and pesticide formulations. So
5 this recommendation took into consideration
6 ongoing work from the Inerts Working Group and
7 feedback. In February we responded to all the
8 recommendations from the fall meeting, so I'll
9 just go briefly through the highlights for
10 that.

11 So in the fall what this Board had
12 recommended was a series of steps to use for
13 preparing inerts review, some screening
14 guidelines, and a tentative list of proposed
15 groups, including a time line for review. The
16 Board also had requested that the Program
17 identify a mechanism to notify manufacturers
18 and the public regarding this inert review
19 process, and specifically that that mechanism
20 should include a list of which inerts are
21 under review and also how to inform the
22 working group of those inerts that are in use

1 but might not be on our radar, or on known
2 list.

3 So a couple of issues in
4 determining which inerts are going to be
5 subject to this review. EPA governs pesticide
6 labeling in the U.S. and they do not require
7 that inert ingredients be included, disclosed
8 on pesticide labels. So they do require the
9 active ingredient, but you'll generally see a
10 listing under that active ingredient that says
11 either inert ingredients or other ingredients.
12 So you have to indicate the percentage of
13 those inert ingredients, but not necessarily
14 identify them.

15 In previous work the working group
16 had identified and grouped a number of inert
17 ingredients. That was based on some feedback
18 from two material evaluation programs. So we
19 think we have at least a starting point for
20 what this list of inerts will look like. List
21 4, if you look at it, there's a lot of inerts
22 on that list, but what we know is that what's

1 currently in use is really a small subset of
2 that list.

3 We have not yet published that
4 full list of inerts. Again we did publish a
5 list of the tentative groups as part of the
6 last Board recommendation, but our intention
7 is to publish that list and the groupings for
8 public comment before proceeding further.

9 So in response to the Board's
10 recommendation for a notification step, our
11 intent is to notify the public of the inert
12 ingredients that we know to be in use in
13 organic production, and again, the basis for
14 that knowledge is the information supplied by
15 material review organizations; to also notify
16 the public of the Board's review plan
17 including how those inerts are currently
18 grouped to get feedback on that, as well as
19 how the Board intends to conduct this review.

20 That notice will include a request
21 for public comments regarding again the inerts
22 that are currently in use and that may not

1 appear on that list yet. And we have drafted
2 a Federal Register notice which will include
3 that official request for public comment.
4 That notice is under legal review and I don't
5 have an estimate on when that will be
6 published just yet.

7 One additional, I guess, point for
8 that Federal Register notice: It's not really
9 our intent at this point in the process to be
10 asking for feedback from the public on which
11 inerts should be allowed in organic production
12 and should not be allowed in organic
13 production. Really the intent of this notice
14 is to gather information, what's currently in
15 use and will need to be reviewed by the Board
16 in order to implement the update to the
17 regulations.

18 Okay. So after that notice is
19 published, the working group will use the
20 comments to finalize the groups of inerts and
21 initiate technical reports. So we've
22 previously told the Board that based on our

1 current estimates there is about 126 inerts
2 that we're aware of that may be in use in
3 products that are marketed for organic
4 production or for organic use. So we'll use
5 the comments received to finalize those lists.

6 And for efficiency, our intent is
7 to initiate the development of one technical
8 report per group of inerts. So we understand
9 that these will be longer technical reports
10 typically than probably for single ingredient
11 substances. But the intent is to not have one
12 technical report per each individual inert
13 ingredient that might be considered by the
14 Board. And again, the Board, following the
15 recommendation, will review these inerts by
16 group rather than making individual
17 recommendations for those substances.

18 So additional progress. Since
19 last fall we've worked with EPA closely to
20 refine those groups. We think we've got a
21 good handle on, for the existing ones that
22 we're aware of, how those will be grouped. So

1 that will be included in the Federal Register
2 notice. Again, we've gone through the
3 technical report template that is used for
4 materials used in crop and livestock
5 production. We've identified a couple of
6 areas that we might update for these group
7 reports, taking into consideration what was in
8 the recommendation from the Board in the fall,
9 as well as some of the issues that might need
10 to be highlighted when things are reviewed as
11 a group, rather than as individual substances.
12 So, you know, there will be probably a
13 learning curve as we do the first couple of
14 these, but we'll see how it goes.

15 And we've also taken one of these
16 identified groups and sort of done a test run
17 using the NOSB checklist that you're familiar
18 with in evaluating substances for crop
19 production. So we don't have the technical
20 report yet, so it is really a trial, but just
21 to see how that would work and how things
22 might work by running that through as a group

1 rather than one single individual substance.

2 Okay. So just briefly, timelines.

3 So what was in the fall recommendation, the
4 intent was to review four to six of these
5 inerts groupings per year during the four-year
6 period beginning in 2013 in order for the
7 Board to complete most of its reviews by
8 spring of 2015. So that timeline that was
9 included in the Board recommendation was
10 intended to allow time for the Program to
11 complete any rulemaking needed to update the
12 listing for inerts by the sunset date for List
13 4. So that's October 2017 for both the List
14 4 listing for crop production and for
15 livestock.

16 Within that recommendation, the
17 Board acknowledged that an implementation
18 period will be needed. So that will depend on
19 the public comment we receive. If there's
20 additional time, that might be needed to
21 complete the reviews and also time for
22 reformulation and compliance, if needed. So

1 at this point we don't really know what the
2 outcome of these reviews will be, so it's hard
3 to gauge how many products may need to be
4 reformulated or whether products will comply
5 with whatever this outcome is, but we
6 understand that if reformulation is necessary,
7 we'll need to allow adequate time for that to
8 take place.

9 So I guess the last step in terms
10 of timeline is that the Board did agree in the
11 fall recommendation to assess the viability of
12 this proposed timeline after it completes its
13 recommendation on the first few groups of
14 inerts. So as the work continues, as the
15 technical reports are developed, we'll see how
16 the process goes, but we do have, I guess, an
17 excuse to go and look back and reassess if we
18 need to, if there are some tweaks that we need
19 to make to the process.

20 And that's it. Thank you.

21 CHAIRMAN STONE: Questions for
22 Lisa, or for Jay or Zea that's on the

1 Committee?

2 MEMBER FELDMAN: I just want to
3 thank the Program for all the work that's
4 going into this and has gone into this. This
5 is an incredibly important area of review and
6 strengthens organic tremendously in the
7 market. Thank you.

8 CHAIRMAN STONE: Francis?

9 MEMBER THICKE: Is this going to
10 be available for us? Lisa, could we have
11 these PowerPoints in Dropbox or something?

12 DR. BRINES: Yes, the presentation
13 will be posted for the Board and the public on
14 our web site in the next few days. Thanks.

15 CHAIRMAN STONE: Okay.

16 DR. BRINES: All right. Thank
17 you.

18 CHAIRMAN STONE: Thank you very
19 much. Appreciate all y'all's due diligence on
20 that one. Okay. I think that I'll turn it to
21 Tracy, and we'll have Lisa read the proposal.
22 And we'll check for declarations, just as a

1 reminder.

2 MEMBER FAVRE: Thank you for that
3 reminder after lunch. That's always welcome.

4 It's my understanding we are going
5 to have a revised recommendation for the
6 proposal for the pet food amino acids.

7 Lisa, do you want to go ahead and
8 -- do we have to do that again, or no? Yes.
9 No? She says no.

10 CHAIRMAN STONE: And Michelle will
11 bring it up while Lisa --

12 MEMBER FAVRE: She shakes her head
13 no.

14 DR. BRINES: Yes, we've already
15 done the introduction for the petition, so I
16 think Subcommittee can take over from here.

17 MEMBER FAVRE: Thanks. Okay. Mac,
18 you took the lead on this. While Michelle's
19 bringing it up, you want to walk through the
20 rationale and the discussion?

21 CHAIRMAN STONE: Okay. Thanks,
22 Tracy. Yes, so based on written comment and

1 public testimony day before yesterday I guess
2 -- yesterday morning -- seems like a long time
3 ago -- we heard and the Committee felt
4 compelled, I'll say it that way, to include or
5 add taurine, synthetic taurine to be available
6 in organic dog foods, not just cat food. And
7 actually the amended motion is pet food. And
8 that's a little bit the vernacular that's used
9 in the rulemaking that will come out -- what
10 date did I say? I think that was October
11 11th, Melissa, that I said on that one. So
12 when the standards come out, you know, that's
13 in line with what we think that language is
14 going to look like versus saying dogs and cats
15 or canine and feline, or whatever.

16 So I'll be glad to go back through
17 any other discussion if Board Members have any
18 clarifications or questions about that.

19 MEMBER FAVRE: Seeing no
20 discussion, do we have any declaration of
21 interest for this from the Board?

22 (No audible response.)

1 MEMBER FAVRE: Well, in the
2 interest of full disclosure, I should say that
3 I am a breeder of dogs and I do use pet foods
4 with taurine in it.

5 CHAIRMAN STONE: Great. Jay?

6 MEMBER FAVRE: Okay. So are we
7 prepared to vote on this again?

8 MEMBER FELDMAN: I'm sorry, I
9 should have said yes when you asked if there
10 were any questions.

11 MEMBER FAVRE: Go ahead, Jay.

12 MEMBER FELDMAN: The question I
13 had yesterday I'm still not clear on. I came
14 across one manufacturer, I think I mentioned,
15 Natural Logic or something, that claims that
16 because of the protein-based diet that they
17 have, I assume it's meat-based, that they meet
18 all of the whatever-the-trade-group-is
19 standards for taurine and other amino acids
20 and so forth. Is that true, or have you
21 looked into that?

22 CHAIRMAN STONE: Yes. Sorry, Jay,

1 I should have followed up because I know you
2 specifically asked about that. The Committee
3 did a survey of -- it's a countable number,
4 but there's a countless number of pet foods,
5 and some manufacturers were producing dog
6 foods that were called "complete and balanced"
7 without any synthetic amino acids. There are
8 several. Just glancing at the list here
9 there's 8 or 10 or 12 that had no added
10 taurine. Some had carnitine and lysine, but
11 not added taurine.

12 But the issue I think that we felt
13 -- because the large breed dogs specifically,
14 and I think, Joe, you said cocker spaniels or
15 something were sort of called out
16 specifically, that because of manufacturer
17 distribution and what not that there's -- the
18 manufacturers and the Pet Food Institute felt
19 like that to have the reach and not get
20 tripped up, someone would be feeding their dog
21 an inferior product if they met some of that,
22 that the Committee was comfortable adding

1 taurine to dog food. It's still a degradation
2 and processing sort of issue specifically to
3 taurine.

4 MEMBER FELDMAN: But it is true
5 then, the manufacturer's claim you believe to
6 be true, that without added taurine that their
7 ingredients provide adequate nutrition?

8 CHAIRMAN STONE: Yes, from looking
9 at this label survey that we did, there are
10 several that claim they can do it without
11 taurine.

12 MEMBER FAVRE: Jay, I might add
13 that it looked as though from the public
14 comments yesterday that some of this research
15 about heart disease and blindness is
16 relatively new as it relates to taurine and
17 giant breeds.

18 Any other questions?

19 (No audible response.)

20 MEMBER FAVRE: Okay. So we have a
21 listing motion. Motion to list amino acids
22 arginine, methionine, cystine, lysine,

1 tryptophan, threonine, histidine, isoleucine,
2 leucine, phenylalanine, tyrosine and valine --
3 and I get extra brownie points for doing that
4 after lunch -- on Section 205.605 for use in
5 organic pet food. Do I have --

6 CHAIRMAN STONE: Technically we
7 need to do a classification motion first.

8 MEMBER FAVRE: Oh, I'm sorry. Did
9 I do the listing? And you know what, you told
10 me not to do that.

11 (Laughter.)

12 MEMBER FAVRE: I was looking at
13 the wrong page. Classification motion to --
14 I'm not reading them again unless it's
15 absolutely required; somebody give me a nod --
16 as synthetic. Do I need to do it again?

17 CHAIRMAN STONE: I think just read
18 them again, just for clarity.

19 MEMBER FAVRE: Oh.

20 CHAIRMAN STONE: You've practiced
21 already.

22 MEMBER FAVRE: All right.

1 Classification motion. Motion to classify
2 amino acids arginine, methionine, cystine,
3 lysine, taurine, tryptophan, threonine,
4 histidine, isoleucine, leucine, phenylalanine,
5 tyrosine and valine as synthetic. Do I have
6 a motion?

7 CHAIRMAN STONE: I'll make that
8 motion.

9 MEMBER FELDMAN: I'll second that.

10 MEMBER FAVRE: I have a motion and
11 a second. Any further discussion?

12 (No audible response.)

13 CHAIRMAN STONE: The vote begins
14 with Jennifer. And I would remind everyone if
15 you'll go just a little bit slower so Wendy
16 and Calvin can be sure to -- and Michelle over
17 there can get an accurate tally.

18 MEMBER TAYLOR: Yes.

19 MEMBER MARAVELL: Yes.

20 MEMBER THICKE: Yes.

21 MEMBER BONDERA: Yes.

22 MEMBER FAVRE: Yes.

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MEMBER BECK: Yes.

MEMBER SONNABEND: Yes.

MEMBER FELDMAN: Yes.

MEMBER RICHARDSON: Yes.

MEMBER DICKSON: Yes.

MEMBER WALKER: Yes.

MEMBER FULWIDER: Yes.

MEMBER AUSTIN: Yes.

MEMBER FOSTER: Yes.

CHAIRMAN STONE: Yes. So that was

15 yes, zero nos.

Miss Tracy?

MEMBER FAVRE: Now we had a little bit of procedural confusion on this because these were listed as -- or petitioned as a group, but given the fact that we've come up with a recommendation for only taurine to be included, we have two listing motions. The first one is: motion to list amino acids arginine, methionine, cystine, lysine, tryptophan, threonine, histidine, isoleucine, leucine, phenylalanine, tyrosine and valine on

1 Section 205.603 for use in organic pet food.

2 Do I have a motion?

3 MEMBER BONDERA: I so move.

4 MEMBER FAVRE: Okay.

5 MEMBER RICHARDSON: Second.

6 MEMBER FAVRE: Okay. I have a
7 motion and a second. Is there any
8 conversation/discussion?

9 (No audible response.)

10 MEMBER FAVRE: Okay. Hearing
11 none, we're prepared to vote.

12 CHAIRMAN STONE: Okay. The vote
13 will begin with Nick.

14 MEMBER MARAVELL: No.

15 MEMBER THICKE: No.

16 MEMBER BONDERA: No.

17 MEMBER FAVRE: No.

18 MEMBER BECK: No.

19 MEMBER SONNABEND: No.

20 MEMBER FELDMAN: No.

21 MEMBER RICHARDSON: No.

22 MEMBER DICKSON: No.

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MEMBER FOSTER: No.

MEMBER WALKER: No.

MEMBER FULWIDER: No.

MEMBER AUSTIN: No.

MEMBER TAYLOR: No.

CHAIRMAN STONE: Chair votes no.

That's 15 nos. Motion fails.

Miss Tracy?

MEMBER FAVRE: Our second listing motion is: motion to list taurine, CAS No. 107-35-7 at 205.603(d) as a feed additive for use in pet foods. Do I have a motion?

CHAIRMAN STONE: I'll make that motion.

MEMBER FAVRE: Okay. Do I have a second?

MEMBER FULWIDER: Second.

MEMBER FAVRE: Any discussion?

(No audible response.)

MEMBER FAVRE: Hearing none, we're prepared to vote.

CHAIRMAN STONE: Thanks, Tracy.

1 The vote will begin with Francis.

2 MEMBER THICKE: Yes.

3 MEMBER BONDERA: Yes.

4 MEMBER FAVRE: Yes.

5 MEMBER BECK: Yes.

6 MEMBER SONNABEND: Abstain.

7 MEMBER FELDMAN: No.

8 MEMBER RICHARDSON: Yes.

9 MEMBER DICKSON: Yes.

10 MEMBER FOSTER: Yes.

11 MEMBER WALKER: Yes.

12 MEMBER FULWIDER: Yes.

13 MEMBER AUSTIN: Yes.

14 MEMBER TAYLOR: No.

15 MEMBER MARAVELL: Yes.

16 CHAIRMAN STONE: Chair votes yes.

17 Thirteen -- no, twelve yeses, two nos and one
18 abstention. Motion is approved. Thank you,
19 Tracy.

20 Jay, if you're ready, I'm thinking
21 in terms if we do like polyoxin and IBA, sort
22 of move those on through. Then we'll have the

1 balance of our day on other ingredients and
2 tetracycline. Is that workable?

3 MEMBER FELDMAN: Thank you. If,
4 Harold, you're ready, I think we could do
5 polyoxin D zinc. Thanks.

6 MEMBER AUSTIN: Okay. We had, you
7 know, some testimony yesterday. We kind of
8 rushed this one a little bit during the
9 Committee process, but I think we had some
10 good testimony.

11 One of the concerns that we'd had
12 with this material is its broad base as a
13 fungicide. I think, you know, we had some
14 descriptive explanations of its activity on
15 soil beneficials. We had concerns over one
16 test of how this material was controlled, its
17 effect on a roach study that was done, and I
18 think some of the concerns were dispelled on
19 that by the process of the study. There were
20 some environmental concerns with earthworms.
21 The petitioner did provide us with some
22 additional studies during the course of the

1 last week. I think all of the Subcommittee
2 had received that.

3 So we've got a motion to classify
4 as polyoxin D zinc salt as petitioned as a
5 synthetic. That came out of the Subcommittee.
6 And we'll move that to a vote, I guess, Jay,
7 unless, you know, we want to go ahead and move
8 the motion or open it up for some discussion
9 at this point.

10 MEMBER FELDMAN: I'd ask if there
11 are any questions on this.

12 MEMBER AUSTIN: Okay. Any
13 questions from the Board at this time?

14 MEMBER FELDMAN: And this would be
15 questions on the overall issue including the
16 classification and the listing motion?

17 MEMBER AUSTIN: Correct.

18 CHAIRMAN STONE: I have one.

19 MEMBER AUSTIN: Mac?

20 CHAIRMAN STONE: If the source of
21 the zinc were more well known or defined as a
22 mined product, would that have affected some

1 of your all's votes, or perception of the
2 material, I should say?

3 MEMBER AUSTIN: I think in some of
4 the discussion that we had, the source of the
5 zinc was a definite component of why the
6 material ended up being classified as a
7 synthetic. The petitioner themselves get the
8 zinc, the product from multiple sources, so
9 they couldn't define if it a natural mined
10 material or if it was a product of sub-
11 manufacturing. So that basis was really the
12 main key basis why we went ahead and moved
13 this forward as a synthetic, or at least that
14 was our motion from the Subcommittee.

15 Any other concerns with that or
16 questions regarding that issue? Jay?

17 MEMBER FELDMAN: Well, you know,
18 there's been some lack of clarity around this
19 whole thing, you know, this whole discussion
20 regarding the broad spectrum or non-specific
21 effect of the material. And we've been mostly
22 concerned about the chitin-inhibiting effects

1 of the material.

2 You know, I was looking at the
3 label on this; I was trying to pull this up as
4 we were talking, but the label on this is
5 pretty clear that it has these, fungistatic
6 they're called, effects, which at least as it
7 appears on the label, are generalized to the
8 population of soil fungi.

9 So I guess my question from, you
10 know, a soil standpoint is whether we should
11 be allowing or listing a material that seems
12 to work contrary to the statutory and
13 regulatory standard to maintain or improve
14 soil and environment. And I guess that is the
15 general -- this chitin inhibition and the --
16 even, I think there was an acknowledgment
17 yesterday by the professor that while it was
18 generalized, he seemed to be less concerned
19 because of the fact that fungi might bounce
20 back or would bounce back afterwards.

21 I think, you know, if we're
22 talking about all the stressors that farmers

1 experience with developing soil fertility,
2 this just seems to run contrary to those
3 practices. So it would be interesting to see
4 if organic farmers as opposed to IPM farmers
5 that have more leeway in terms of introducing
6 other soil fertility methods would even choose
7 to use something like this. It just seems
8 contrary to and incompatible with organic
9 practices.

10 MEMBER AUSTIN: Tracy?

11 MEMBER FAVRE: Jay, just to
12 address that comment, I had those same
13 concerns on the chitin inhibition. I'm not
14 particularly for this material, but one of the
15 presenters yesterday did say that not all
16 chitin is the same and that the difference
17 between this product and others is that it was
18 specifically targeted for the kind of chitin
19 in the cell walls of the particular fungi that
20 caused the problem. And I think the issue
21 about the cockroaches was sort of debunked
22 anyway.

1 MEMBER AUSTIN: Zea?

2 MEMBER SONNABEND: In addition to
3 looking at the direct effect on the soil that
4 any one compound would have, we have to look
5 at it in relationship to the alternatives to
6 that material. And I do not see this one as
7 having any greater effect than the other
8 things that are on the List as fungicides such
9 as copper and sulfur compounds. In fact, I
10 think it has less effect overall because it is
11 so short-lasting compared to copper and sulfur
12 which have residuals that will last for quite
13 a long time. And therefore, I feel that it is
14 a valuable tool as the people stated, in an
15 alternating situation where you can alternate
16 this very benign material with a harsher
17 material to avoid developing resistance.

18 So I do see it as appropriate.
19 With any relatively new material, we're not
20 going to have the benefit of grower experience
21 to compare it to the alternatives that are
22 listed on labels only because it has not been

1 allowed in organics so far. And so we just
2 don't have growers who are stakeholders that
3 are going to be able to report to us.

4 But I do think that it is a better
5 choice in many of these harder-to-control
6 diseases than what we have now, and truly for
7 things like late blight in tomatoes and the
8 disease which I can't pronounce, that Jerry
9 Thomas was here about, those that truly are
10 not other choices. You just take your lumps
11 and move on.

12 MEMBER AUSTIN: Mac, do you have a
13 question?

14 CHAIRMAN STONE: Excuse me.
15 Apologize for disrupting the flow of the
16 conversation, but I guess point of order. We
17 should have a motion and a second for
18 discussion purposes.

19 MEMBER AUSTIN: Okay. The motion
20 that we had out of the Crops Committee was to
21 classify polyoxin D zinc as petitioned as a
22 synthetic.

1 MEMBER FELDMAN: Second.

2 MEMBER AUSTIN: We have a second.

3 Do we want to go ahead with the -- should we
4 go ahead and vote on this one, or do we want
5 to continue to discuss now that we have a
6 motion on the floor?

7 CHAIRMAN STONE: If there's
8 discussion on classification, then we can have
9 that discussion now. Then we can discuss --

10 MEMBER AUSTIN: Okay.

11 CHAIRMAN STONE: -- attributes in
12 the next motion.

13 MEMBER AUSTIN: Any further
14 discussion on the classification?

15 (No audible response.)

16 MEMBER AUSTIN: If not, I think
17 we're prepared to vote.

18 CHAIRMAN STONE: Okay. Colehour
19 is the first vote.

20 MEMBER BONDERA: Yes.

21 MEMBER FAVRE: Yes.

22 MEMBER BECK: Yes.

1 MEMBER SONNABEND: Yes.

2 MEMBER FELDMAN: Yes.

3 MEMBER RICHARDSON: Yes.

4 MEMBER DICKSON: Yes.

5 MEMBER FOSTER: Yes.

6 MEMBER WALKER: Yes.

7 MEMBER FULWIDER: Yes.

8 MEMBER AUSTIN: Yes.

9 MEMBER TAYLOR: Yes.

10 MEMBER MARAVELL: Yes.

11 MEMBER THICKE: Yes.

12 CHAIRMAN STONE: And yes. Sounds
13 like unanimous 15-0. Harold?

14 MEMBER AUSTIN: Okay. For the
15 listing motion itself, to add polyoxin D zinc
16 salt to the National List at 205.601 as a
17 synthetic substance allowed for use in organic
18 crop production.

19 MEMBER BONDERA: I so move.

20 MEMBER THICKE: I'll second.

21 MEMBER AUSTIN: We have a motion
22 and we have a second. Is there any discussion

1 on the listing motion? John?

2 MEMBER FOSTER: So the question
3 about statutory-ness -- I know it's not a
4 word, but I'll use it anyway -- I think the
5 National List was designed to be a list of
6 exceptions, so it's already a list of
7 exceptions. And if that wasn't okay, we
8 wouldn't have a list of exceptions. And the
9 exceptions only go on after, I would say, a
10 fair degree of scrutiny and those exceptions
11 aren't allowed unless they're listed.

12 So I think the whole regulation
13 was built, designed, intended to allow a spare
14 number of exceptions, and I think this is a
15 good example of a preferable material that in
16 my view meets the criteria adequately and has
17 the potential to replace more problematic
18 materials. If it's a little bit better, then
19 that's better and we should go with better.
20 If it's not perfect, it joins a long line of
21 things that aren't perfect. So I'm okay with
22 a little bit better, and I'll stop there.

1 MEMBER AUSTIN: Francis?

2 MEMBER THICKE: Yes, I'd like to
3 address the issue of it being a more broad-
4 spectrum fungicide or, as it said in the
5 technical review, it actually has been
6 classified as an antibiotic by -- they listed
7 eight references for that. And on the label,
8 as I think Jay said, it's listed as a
9 fungicide and it also has a warning about
10 overuse and resistance, so we have to watch
11 out for that.

12 And as far as being broad-
13 spectrum, there are listed in the technical
14 review 22 different pathogens that it's active
15 against. And so of course that means it's
16 pretty broad-spectrum and it would be as well
17 probably, as they actually say, against a wide
18 range of fungi, which would be beneficial as
19 well. So I'm concerned about that.

20 There was something you said
21 earlier and that in the petition that it's a
22 fungistatic and not a fungicide, but if you go

1 on Google, the definition of fungicide, it
2 actually says it inhibits or kills fungus. So
3 it really is a fungicide.

4 And then the half-life is 32« days
5 at ambient -- you know, at 77 degrees
6 Fahrenheit at pH 7. So that's a long half-
7 life for soil bacteria -- soil fungi to be,
8 you know, working against it and then half is
9 still left. And often it can be cooler, so it
10 could have a longer time. So I'm concerned
11 about the effects on beneficial soil life and
12 especially, as I think Jay mentioned, if
13 you're trying to build up your soil life and
14 build that whole thing up in your soil, you're
15 going to be working against that.

16 MEMBER AUSTIN: I think as far as
17 the antibiotic part of it, the definition or
18 the explanation that the petitioner gave us,
19 the rationale that it was listed as a
20 fungicide rather than an antibiotic was that
21 this is not used in animal or human health,
22 strictly in plant control and the disease

1 vector.

2 MEMBER THICKE: Okay.

3 Interesting.

4 MEMBER AUSTIN: Francis?

5 MEMBER THICKE: I wouldn't argue,
6 actually. I think the distinction is fine,
7 but they did mention that. They called it an
8 antibiotic. But I think a fungicide is
9 actually more appropriate.

10 MEMBER AUSTIN: Yes. The other
11 thing I would point out, because we really
12 didn't cover this very well yesterday, we kind
13 of rushed through it; and these were some of
14 the concerns on the majority opinion coming
15 out of the Crops Committee, from some of the
16 speakers, also from the minority opinion
17 coming out of the Crops, was, you know, I
18 think we've heard it a little bit, was that
19 this is a unique mode of action. It's a FRAC
20 19. It will aid in resistance management,
21 rather than using the same fungicidal approach
22 over and over and over again. So the grower

1 would be able to use it in a rotational
2 fashion.

3 The other positive part of that
4 was that it is a curative material, so that
5 they don't technically have to go out in a
6 prophylactic approach and apply it, that they
7 would be able to apply it after they've had a
8 infection rather than prior to infection,
9 where the materials, the fungicides that they
10 have currently would have to be preemptive and
11 put on prior to an infection starting to take
12 place and develop. So there are some
13 advantages in looking at the mode of action,
14 looking at how it would be applied, how it
15 would be utilized.

16 I think total, I believe there
17 were five diseases that the material itself
18 would be effective in controlling. Alternaria
19 was one of those. Yes, I'm not sure that was
20 the one you'd been having trouble with. Gummy
21 stem and then Southern blight were kind of the
22 three that really stood out that really did

1 not have very good control methods or
2 materials out there that -- especially in the
3 coastal regions where they really had a lot of
4 high humidity.

5 Any further questions? Jay?

6 MEMBER FELDMAN: I thought it
7 might be interesting for folks to be aware --
8 it's interesting you mention resistance
9 management, because on the label they have a
10 box that's identified as resistance
11 management, and they say that the fungicide
12 contains a Group 19 fungicide. Fungal
13 isolates with acquired resistance to Group 19
14 may eventually dominate the fungal population
15 if Group 19 fungicides are used repeatedly in
16 the same field or in successive years as the
17 primary method of control for targeted
18 species. This may result in partial or total
19 loss of control of those species by -- and
20 then this polyoxin D product which happens to
21 be ENDORSE Wettable Powder Turf Fungicide, or
22 other Group 19 fungicides.

1 And then they have a list of
2 resistant management practices that they
3 suggest in terms of utilizing, rotation --
4 uses like you're referring to, and monitoring
5 treated fungal populations for loss of field
6 efficacy. So there is, like we know from the
7 conventional side, where you get dependent on
8 these products you end up with a resistance
9 problem.

10 MEMBER AUSTIN: Well, and I think
11 that the general opinion or the practice or
12 approach was going to be that it was going to
13 be used as a tool, part of a rotational
14 process. And if I'm not mistaken, in the
15 information that we were presented with, this
16 is the only FRAC 19 material out there.

17 Any further discussions? Any
18 further questions?

19 (No audible response.)

20 MEMBER AUSTIN: Hearing none, I
21 think we're ready to vote.

22 CHAIRMAN STONE: Okay. Thank you,

1 Harold. I'm thinking that Tracy is first.

2 MEMBER FAVRE: No.

3 MEMBER BECK: Yes.

4 MEMBER SONNABEND: Yes.

5 MEMBER FELDMAN: No.

6 MEMBER RICHARDSON: No.

7 MEMBER DICKSON: Yes.

8 MEMBER FOSTER: Yes.

9 MEMBER WALKER: No.

10 MEMBER FULWIDER: Yes.

11 MEMBER AUSTIN: Yes.

12 MEMBER TAYLOR: No.

13 MEMBER MARAVELL: No.

14 MEMBER THICKE: No.

15 MEMBER BONDERA: No.

16 CHAIRMAN STONE: Chair votes no.

17 MEMBER FELDMAN: Thank you. John,

18 we'll turn this over to you for IBA. Thank

19 you.

20 CHAIRMAN STONE: One second. That

21 was six yes and nine no, is that correct? Six

22 yes, nine no. The motion fails.

1 MEMBER FELDMAN: Sorry, Mac.

2 Okay, John. I was a little preemptive there.

3 Thank you.

4 CHAIRMAN STONE: That would be
5 really the decisive/indecisive vote, wouldn't
6 it?

7 MEMBER FELDMAN: Yes.

8 (Laughter.)

9 MEMBER FOSTER: So we have next up
10 a petition material proposal, indole-3-butyric
11 acid, CAS No. 133-32-4. Going to be referring
12 to it as IBA from now on.

13 We heard the summary before. I
14 think we'll go straight into the
15 classification motion, get us set up for any
16 discussion that might happen.

17 I'd like to move to classify
18 indole-3-butyric acid, CAS No. 133-32-4, as
19 petitioned as synthetic.

20 MEMBER BONDERA: I'll second that.

21 MEMBER FOSTER: Further discussion
22 on the classification motion?

1 Seeing none, we can proceed to
2 vote.

3 CHAIRMAN STONE: Thanks, John.
4 We'll begin with Carmela.

5 MEMBER BECK: Yes.

6 MEMBER SONNABEND: Yes.

7 MEMBER FELDMAN: Yes.

8 MEMBER RICHARDSON: Yes.

9 MEMBER DICKSON: Yes.

10 MEMBER FOSTER: Yes.

11 MEMBER WALKER: Yes.

12 MEMBER FULWIDER: Yes.

13 MEMBER AUSTIN: Yes.

14 MEMBER TAYLOR: Yes.

15 MEMBER MARAVELL: Yes.

16 MEMBER THICKE: Yes.

17 MEMBER BONDERA: Yes.

18 MEMBER FAVRE: Yes.

19 CHAIRMAN STONE: And yes.

20 Unanimous 15-0 to approve.

21 MEMBER FOSTER: Next I'll make a
22 listing motion. I move to list indole-3-

1 butyric acid, CAS No. 133-32-4, as petitioned
2 on 205.601 for the purpose of plant
3 propagation via dipping. Is there a second?

4 MEMBER AUSTIN: Second that.

5 MEMBER FOSTER: Thank you, Harold.
6 Is there any further discussion on the listing
7 motion? Mac?

8 CHAIRMAN STONE: I'll just point
9 out, so now in plant stock rootings - can't
10 think of the term now -- but growers, if they
11 were to use this product, they could then use
12 it in planting stock that could become organic
13 a year later, I believe, because of the way
14 the regulation reads. So you couldn't use it
15 and sell the plant. You couldn't if it's an
16 annual or some of those types of things, but
17 it -- yes.

18 MEMBER FOSTER: More discussion or
19 comments on this?

20 MEMBER FELDMAN: Just for the
21 record, could we explain the history on this?
22 Would that be -- I guess it's in the written

1 material, but it might be useful to --

2 MEMBER FOSTER: Sure. It was
3 petitioned first, I believe, in 2009. A prior
4 iteration of the Board, I believe, in 2011
5 voted not to include it on the List. The
6 petitioner came back, narrowing the
7 application method. Also, pulling out some of
8 the finer details from the extensive
9 appendices in the first application, putting
10 some of those -- I believe not a whole lot of
11 new substantive information that wasn't in the
12 appendices, but made it more readily
13 available. That, along with the narrowed
14 application, got it back on our plate for
15 reconsideration.

16 With that, any more discussion or
17 comments?

18 I guess I'll just let it be known
19 that for four years I used this material; this
20 was about 15 years ago, as a plant propagator.
21 So I don't know if past financial interest
22 counts here, but I assume not. I thought I'd

1 get it out on the table.

2 Hearing no other comments, we'll
3 proceed to vote.

4 CHAIRMAN STONE: Voting begins
5 with Zea.

6 MEMBER SONNABEND: No.

7 MEMBER FELDMAN: No.

8 MEMBER RICHARDSON: No.

9 MEMBER DICKSON: No.

10 MEMBER FOSTER: Yes.

11 MEMBER WALKER: No.

12 MEMBER FULWIDER: No.

13 MEMBER AUSTIN: Yes.

14 MEMBER TAYLOR: No.

15 MEMBER MARAVELL: No.

16 MEMBER THICKE: No.

17 MEMBER BONDERA: No.

18 MEMBER FAVRE: No.

19 MEMBER BECK: Yes.

20 CHAIRMAN STONE: Chair votes no.

21 That's 12 no, and 3 yes. Motion fails.

22 Thank you, John.

1 Jay?

2 MEMBER FELDMAN: Thank you, Mac.

3 I guess we'll return with tetracycline later.

4 Thank you.

5 CHAIRMAN STONE: Right. So if my

6 memory serves me occasionally, I think we're

7 down to other ingredients and tetracycline.

8 Is that the way the voting record looks?

9 So with that, I'd like to move

10 back to the other ingredient conversation that

11 several of us visited during lunch, got some

12 clarity to some of Nick's concerns and we had

13 -- I don't know if you all had some amended

14 language that you -- so what I'd like to do I

15 guess is let's get a motion and a second on

16 the table. If we make amendments to the

17 document, then it will be to approve as

18 amended when we get to the end of any changes.

19 So we'll put, Michelle, the

20 original document up before we add Nick's

21 earlier OFPA criteria in that policy section.

22 But I'll turn it back over to John.

1 MEMBER FOSTER: So then I would
2 ask again, Zea, to kind of round us up, to
3 move us through the process.

4 MEMBER SONNABEND: Is the motion
5 we're putting on the table the revised
6 document that I presented this morning,
7 because those revisions have been approved by
8 the Subcommittee already? Okay.

9 So I move to adopt the other
10 ingredients -- oh, the ancillary substances
11 policy, formerly known as "other ingredients,"
12 as revised by the Handling Subcommittee and
13 presented.

14 MEMBER FOSTER: I'll second that.

15 CHAIRMAN STONE: So we can proceed
16 to vote?

17 MEMBER SONNABEND: Okay. So
18 for --

19 CHAIRMAN STONE: Now for the
20 discussion.

21 MEMBER SONNABEND: In the way of
22 further discussion, I will start by saying the

1 change that I heard us all agree to this
2 morning I believe was to -- moving down to
3 policy, the recommendation, policy and
4 procedure under policy, the first sentence to
5 read, "The NOSB intends to review other
6 ingredients found in substances on and
7 petitioned for the National List in accordance
8 with OFPA criteria."

9 So I think we -- how do we proceed
10 then? If it's consensus we just keep going
11 with more amendments that are consensus?
12 Okay. Then I do want to add one that we
13 didn't exactly talk about this morning but
14 that was sort of implied, which is: I would
15 like to change the title of the document to be
16 "Ancillary substances/other ingredients."

17 (Laughter.)

18 MEMBER SONNABEND: Well, we want
19 to be consistent, don't we? Is there
20 consensus around that? Okay.

21 MEMBER MARAVELL: I would suggest
22 -- are we going to do one or the other? We're

1 going to have two names for the same thing?

2 I would suggest just doing one or the other.

3 MEMBER SONNABEND: Well, how about
4 other ingredients in parentheses instead of
5 hyphen?

6 MEMBER MARAVELL: Fine.

7 MEMBER SONNABEND: Because people
8 have been recalling it that for so long, we
9 don't want to --

10 MEMBER MARAVELL: Right. That's
11 fine.

12 MEMBER SONNABEND: Okay.

13 MEMBER MARAVELL: Would the text
14 then reflect ancillary or --

15 MEMBER SONNABEND: Yes, and
16 because it's very cumbersome to make every
17 change in that regard now, if people will just
18 trust us for the final recommendation to try
19 and bring that language into consistency.

20 CHAIRMAN STONE: Or something like
21 that.

22 (Laughter.)

1 MEMBER FOSTER: To make
2 consistent?

3 CHAIRMAN STONE: I'm okay with the
4 dual name in the title because the memo to the
5 Board was called other ingredients.

6 MEMBER SONNABEND: Was called
7 other ingredients.

8 CHAIRMAN STONE: And we've changed
9 it, so this is the transition phase of that
10 name change.

11 MEMBER SONNABEND: Okay. So that
12 was the only consensus additional change I
13 heard this morning, and so if people have
14 other ones to propose now, the floor is open.

15 MEMBER FELDMAN: Okay. Yes, I
16 have a change in the first paragraph that I
17 think I can propose.

18 MEMBER SONNABEND: The very first
19 paragraph?

20 MEMBER FELDMAN: Yes, the very
21 first paragraph. You heard a conversation
22 this morning about whether the law requires

1 that other or auxiliary ingredients be
2 included on the National List, and I think the
3 broad answer to that is yes. And where we
4 have flexibility it appears is the form in
5 which it appears on the National List. So as
6 Lisa Brines explained, with inert ingredients
7 we're choosing to at least for the moment
8 discuss this things in group and presumably
9 that will lead to their listing in groups. I
10 don't know. I mean, that's one possibility.

11 So, and there are other groupings
12 on the List, as Miles pointed out. Excipients
13 I think was one, right? So I would propose
14 that part of the confusion is that people are
15 unsure as to what the intent here is, although
16 I think if you parse through the document you
17 might be able to find it. And you probably
18 will, but I think it's helpful to get it up
19 front.

20 So anyway, the first paragraph,
21 last sentence I would suggest should read --
22 I'll read the whole sentence starting with

1 "Since" -- boy, that's a long sentence, Zea.
2 "Since OFPA requires that each non-
3 agricultural ingredient be specifically listed
4 and because the National List does not
5 specifically list other ingredients commonly
6 found in formulated products, the NOP
7 identified the need for clarity and requested
8 that the NOSB develop a policy that specifies"
9 -- delete the words "whether these other
10 ingredients are allowed" -- that specifies
11 that all non-organic constituents of organic
12 foods be on the National List in some form."

13 MEMBER BONDERA: Can you reread
14 that, please?

15 MEMBER FELDMAN: Let's see, strike
16 the last one, two, three, four, five, six
17 words, "whether these other ingredients are
18 allowed," and say that "all allowed non-
19 organic constituents of organic foods be on
20 the National List in some form." Or maybe
21 "constituents" isn't the right word, but --

22 MEMBER MARAVELL: Could you repeat

1 that one more time, Jay?

2 MEMBER FELDMAN: "That all allowed
3 non-organic constituents of organic foods be
4 on the National List in some form."

5 MEMBER BONDERA: Yes, Michelle,
6 you have to strike the "allowed on" and the
7 last six words. The final six words of your
8 -- yes, right there. The second time you say
9 "allowed," yes.

10 CHAIRMAN STONE: And just so those
11 in the audience know, we work very hard for
12 six months to avoid wordsmithing on the fly
13 like this. But I'm not saying it's not
14 necessary. I'm just saying that it's awkward.

15 Nick?

16 MEMBER MARAVELL: Yes, I have no
17 objection to the word "constituents," but I
18 would just like to receive some input or
19 advice from the program or other members of
20 the Board if there is a better word to use
21 there.

22 CHAIRMAN STONE: No very strong

1 feelings about it. Tracy?

2 MEMBER FAVRE: This seems a pretty
3 dramatic change from what the intent of what
4 this document was. And I'm a little
5 uncomfortable making this decision or this
6 change on the fly --

7 MEMBER FELDMAN: Yes.

8 MEMBER FAVRE: -- because if I was
9 reading this in a vacuum, I would make the
10 assumption that all the ancillary substances
11 would somehow end up being listed individually
12 on the List, or it could be interpreted that
13 way, and that's not the intent of this
14 document.

15 MEMBER SONNABEND: Miles, could
16 you explain what you explained at lunch to
17 Tracy?

18 MR. McEVOY: Yes. Well, we're
19 just trying to see what we said in 2011, and
20 it seems like it's missing a couple of things
21 there because we did identify the need for
22 clarity and requested that the NOSB develop a

1 policy on this. We can't allow things that
2 are not allowed in the regulation. And so
3 it's clear in terms of other ingredients and
4 crop production; for instance, inert
5 ingredients, they're listed. They're on the
6 National List. The same for in livestock.
7 There's the excipients. They're on the
8 National List.

9 So we do need clarity in the
10 regulation in terms of how these ancillary
11 substances -- what do we call them now --
12 ancillary substances are listed in the
13 National List. So this seems like it could
14 work. It does spell out what the intent of
15 the proposal is, is that it clarifies what
16 ancillary substances are allowed and which one
17 are not. And you'd go through a process to do
18 that and they have to be on the List in some
19 form or another in order for us and certifiers
20 and businesses to know what ancillary
21 substances are allowed and which one are not.

22 MEMBER BONDERA: And I think my

1 understanding is that we, the NOSB, don't know
2 what form that's going to take and that's why
3 that "in some form" makes sense, because we
4 don't know how they'll be listed as groups or
5 whatever. But if they aren't there, like you
6 said, they can't be dealt with. So that's at
7 least my understanding.

8 MEMBER SONNABEND: There are a
9 number of forms that this could take that do
10 not necessarily mean each individual substance
11 appears on the List. For instance, in crops
12 inputs there's one clause on the National List
13 that says "and inert ingredients not of
14 toxicological concern." So it could be a
15 parallel construction to that at its most
16 general. It could just say, a clause, "an
17 ancillary substance as identified in
18 guidance." Or it could be item-by-item
19 annotated by class, like all carriers, all
20 preservatives -- you know, by class. Or in
21 some cases it could be individual. But it
22 leaves it open, until the Department can come

1 back to us with any further clarification and
2 until we start our review and see what comes
3 up in the course of review.

4 CHAIRMAN STONE: I think it
5 doesn't tie our hands too much to see what
6 form these things come in. I appreciate your
7 concern. I don't think it overly constricts
8 the Program and us to work together to figure
9 out what form this monster is going to look
10 like as we go forward.

11 I have a clarification question, a
12 procedural rookie chair question, I guess. So
13 I like because this group gets along well and
14 respects each other's time and we can have
15 conversation, but do we need to state -- have
16 people be called on for the record so we know
17 who is saying what, or is that captured
18 automatically somehow? It might look like
19 Tracy had said all of that discussion.

20 So let's go ahead while they're
21 getting back to that. That's just for clarity
22 later in the transcript. So any further

1 discussion here? I think we're okay on this
2 language. Jay?

3 MEMBER FELDMAN: Okay. And then
4 as I discussed this morning, I think it would
5 be helpful since we are treading in -- well,
6 a lot of you know a lot about this area, but
7 for some of us in waters that are sort of like
8 net pens in the ocean. Sorry about that.
9 When we talk about baseline criteria and other
10 ingredients, I really think we do need to put
11 a clause in there "as defined below but not
12 limited to." And that's under baseline. And
13 where we have those lists of categories, I
14 think they're well-intentioned lists, but we
15 may be missing something.

16 Oh, God, you think I can do that?
17 Where's baseline? Well, I don't have the page
18 number because I've edited this so much, but
19 it says, "The baseline criteria are as
20 follows: Other ingredients." And then
21 there's (1) and (2) and then (3) and (4). So
22 "are as follows, but not limited to," and then

1 we would have the list.

2 MEMBER SONNABEND: Are you sure
3 you want to say that, because already it's
4 everything that's possibly allowed in food in
5 the United States?

6 MEMBER FELDMAN: Well, is it?

7 MEMBER SONNABEND: Yes, that's
8 what EFIS is.

9 MEMBER FELDMAN: See, that's why I
10 prefaced my comment.

11 CHAIRMAN STONE: So just so you
12 all know, Tony the transcriptionist, he is
13 clued in partly by microphone position, but he
14 knows our names and he knows our voices by
15 now, so he can capture that kind of
16 conversation. I like that it can be a little
17 less formal since so far in this conversation
18 we're doing well of not arguing across the
19 table with dueling microphones. So thank you
20 all for that. And it allows for a little
21 cleaner and faster conversation, a little less
22 formal conversation.

1 So, Zea?

2 MEMBER SONNABEND: So you're
3 withdrawing that change, right, Jay?

4 MEMBER FELDMAN: Okay.

5 MEMBER SONNABEND: Other suggested
6 changes?

7 (No audible response.)

8 MEMBER SONNABEND: Does that mean
9 we're ready to vote?

10 MEMBER FELDMAN: Yes.

11 MEMBER SONNABEND: Yes? Awesome.
12 Nick, you're ready to vote?

13 MEMBER MARAVELL: Yes.

14 CHAIRMAN STONE: Going once, going
15 twice.

16 MEMBER MARAVELL: Am I ready to
17 vote, Mr. Chair?

18 CHAIRMAN STONE: Yes, I believe
19 you are.

20 MEMBER MARAVELL: Okay.

21 MEMBER FELDMAN: I just want to
22 say that I hope that there's some openness to

1 tweaking this document as we move along,
2 because as we dig into this we may find that
3 we are limiting ourselves. But I think the
4 intent is clear. If we follow the National
5 List criteria and the compliance with OFPA, I
6 think that's what important here. How we go
7 about generating the list and so forth is
8 going to be an ongoing process, I hope. Hope
9 we're not setting this in stone.

10 CHAIRMAN STONE: I'll suggest
11 that, yes, we're -- Program asked us to help
12 figure it out. We will be very much a work in
13 progress with the Program, but I'm sure
14 they're going to kick a lot of this back to us
15 and consider our capabilities of time and
16 expertise and they'll have theirs. And it
17 will take a little while to flesh this out and
18 I'd like to be sure that the record reflects
19 how much energy and time this Board has put
20 into getting this document in an effort to
21 further refine and clarify the product that
22 carries the seal on behalf of the public

1 confidence.

2 And I'll ask --

3 MEMBER SONNABEND: Point of order,
4 Mac? Sorry.

5 CHAIRMAN STONE: Oh, yes, ma'am?

6 MEMBER SONNABEND: I'm just not
7 sure, you know, the parliamentarian could say,
8 are we then supposed to vote on the amendments
9 suggested now as amendments and then add them
10 to the whole motion, or is it just one vote?

11 CHAIRMAN STONE: Well, if you
12 hadn't interrupted me, I was going to get to
13 that.

14 MEMBER SONNABEND: What?

15 CHAIRMAN STONE: If you hadn't
16 interrupted, I was just getting to that.

17 MEMBER SONNABEND: Okay. Sorry.

18 (Laughter.)

19 CHAIRMAN STONE: So if Zea or
20 Harold that made the motion and seconded see
21 these as friendly amendments, say yes for the
22 record.

1 MEMBER SONNABEND: Yes.

2 MEMBER AUSTIN: Yes.

3 CHAIRMAN STONE: So having that
4 being accepted as friendly amendments, we can
5 now vote on the motion. Any further
6 discussion?

7 Very good. So the voting will
8 start with Jay.

9 MEMBER FELDMAN: Yes.

10 MEMBER RICHARDSON: Yes.

11 MEMBER DICKSON: Yes.

12 MEMBER FOSTER: Yes.

13 MEMBER WALKER: Yes.

14 MEMBER FULWIDER: Yes.

15 MEMBER AUSTIN: Yes.

16 MEMBER TAYLOR: Yes.

17 MEMBER MARAVELL: Yes.

18 MEMBER THICKE: Yes.

19 MEMBER BONDERA: Yes.

20 MEMBER FAVRE: Yes.

21 MEMBER BECK: Yes.

22 MEMBER SONNABEND: Yes.

1 CHAIRMAN STONE: Yes. Unanimous
2 yes. Very good. Very good. Thank you all
3 very much. But don't feel too good about it
4 because look what we got to do now?

5 (Laughter.)

6 CHAIRMAN STONE: Okay. Seeing the
7 time, the agenda, I know everyone in the
8 audience has been sort of like when are we
9 going to get to it? We're going to get to it,
10 the tetracycline conversation, right after a
11 15-minute break. It's 2:30. We'll come back
12 at 2:45. Thank you.

13 (Whereupon, the above-entitled
14 matter went off the record at 2:26 p.m. and
15 resumed at 2:44 p.m.)

16 CHAIRMAN STONE: I'll call the
17 meeting back to order. Appreciate everyone's
18 interest. Appreciate those in the audience
19 that have stayed with us the entire week. I
20 hope you can see and hear and feel the
21 anxiety, the decision that we're about to make
22 one way or the other. I know some people will

1 be glad or excited, but fully realize there's
2 people sitting next to you that may be upset,
3 whichever way this thing goes. So we hope
4 that in one way or the other we're advancing
5 the organic seal, the integrity of organics,
6 short term and long term. But I just thought
7 about it at a break there, that remember
8 there's people that could be hurt by this
9 whichever way it goes. So just remember that.

10 Okay. Jay, I guess at this point
11 we'll ask for a motion and a second to get the
12 conversation started.

13 MEMBER FELDMAN: Thank you, Mac.
14 I'm going to turn this over to Harold to
15 manage this because he has been carrying the
16 majority position and leading the Subcommittee
17 on this.

18 We've already had all our
19 disclosures on this, so we're all set to go.
20 Thank you, Harold.

21 MEMBER AUSTIN: Okay. Michelle is
22 going to throw this up on the screen.

1 Based off of the oral comments and
2 testimonies that we heard yesterday, the Crop
3 Subcommittee has met and we're going to come
4 forward with a little bit of an alternative
5 motion compared to the one that we had
6 originally listed, a little bit of an
7 inclusion taking some commentary out of this
8 interest position that Lynn presented to us
9 yesterday. Trying to put this motion as we
10 move it forward, because this is a very
11 difficult issue with a lot of stakeholders on
12 every side of this equation being held in the
13 balance. So we're trying to bring something
14 forward that may be just a little bit more
15 balanced from the original proposal.

16 The new motion as adopted by the
17 Crops Subcommittee recommends amending the
18 listing for tetracycline to remove the
19 expiration date of October 21st, 2014 and add
20 the following annotation: "205.601, Synthetic
21 Substances Allowed for the Use in Organic
22 Production as a Plant Disease Control.

1 Tetracycline for fire blight control in apples
2 and pears only until October 21st, 2016.
3 Tetracycline may be used if the grower has
4 implemented an integrated system of practices
5 and materials to control fire blight. Orchard
6 management systems must demonstrate an annual
7 increase in the extent or number of the
8 alternative practices for managing fire
9 blight."

10 That's the motion.

11 CHAIRMAN STONE: Is there a
12 second?

13 MEMBER MARAVELL: I'll second, or
14 I'll make the -- are you making the motion
15 or --

16 MEMBER AUSTIN: I'll go ahead and
17 make it as stated.

18 MEMBER MARAVELL: Okay. And I
19 will second.

20 MEMBER AUSTIN: Thank you, Nick.
21 Mr. Chair?

22 CHAIRMAN STONE: Thinking about

1 this a little bit as we enter this discussion
2 phase, a lot has been said over the last few
3 days, last few years around this conversation.
4 Specifically to the Board, I would suggest
5 that we discuss it openly and people can speak
6 their views. And then at some point I'm going
7 to call time and each of us will go around the
8 table and just each of us will have a few
9 minutes -- we won't use a stop watch/stop
10 light, but each of us have a few minutes to go
11 around, and others that may not be comfortable
12 entering the fray, if you will. And once we
13 get through that round, there may be a few
14 closing remarks. But we could go back and
15 forth on this for a long time and not change
16 very much. So I just suggest we have that
17 process. And I'm thinking -- I'm not going to
18 say a time, but the -- okay. Thank you.

19 MEMBER AUSTIN: Okay. We have a
20 motion and we have a second. We'd like to
21 open it up for discussion at this time. Are
22 there questions or comment from the Board?

1 (No audible response.)

2 MEMBER AUSTIN: Seriously?

3 (Laughter.)

4 MEMBER AUSTIN: Let me do that
5 again.

6 MEMBER SONNABEND: Well, I'm
7 confused because Mac said we'll talk about it
8 and then we'll go around. And so I don't know
9 whether to talk about it or wait until we go
10 around.

11 CHAIRMAN STONE: I guess I made a
12 presumption that there would be some start,
13 but maybe we've discussed it. Maybe we do
14 just go around. I just don't want to go back
15 and forth and back and forth and back and
16 forth. And so maybe we are ready to go
17 around. Why don't you start? Go for it.

18 MEMBER SONNABEND: Okay. The
19 majority position, you know, and I hope really
20 both positions in this issue feel a lot of
21 compassion and concern for the other side of
22 the issue, even if we are on one side of the

1 issue. This is a hardship for everybody.
2 It's no doubt about it, no matter which way we
3 go, as Mac said, it's going to be a hardship
4 for some group of people.

5 So those of us in proposing to
6 have an extension, because we feel that it is
7 so vital for the growers to be able to
8 transition out of this material in a way that
9 is feasible for their livelihoods, want to do
10 so in a way that it creates the most
11 definitive statement that we can possibly make
12 to consumers that this really is the end of
13 the material and acknowledging the concerns
14 that consumers have about the effect on human
15 health and the environment.

16 Well, I'll save the rest for my
17 wrap up. But this is the reason that we
18 modified our first motion, because we were
19 told by the interest people in the room that
20 acknowledging the concerns as some consumers
21 as far as definitive oversight and definitive
22 quantification of alternative practices would

1 help appease their concerns. Even though some
2 people on the Board and some people off the
3 Board think this is already covered in the
4 law, we're absolutely willing to say it again
5 if it helps ease anybody's concern. And so
6 that's how the new motion is crafted.

7 MEMBER AUSTIN: Nick?

8 MEMBER MARAVELL: Yes, I'd like to
9 ask a point of clarification. We have a
10 resolution in addition to this, and my
11 understanding is regardless of which way the
12 vote goes on the listing motion, that we will
13 also vote on the resolution. The resolution
14 will be amended slightly because some of what
15 was in the resolution is now in the listing
16 motion.

17 Am I correct in assuming that
18 there will be a second vote on the resolution,
19 which basically says we're phasing this out
20 and we're asking for research priority? So
21 there will be a second vote? Okay.

22 MEMBER AUSTIN: Right, I just

1 wasn't going to bring it up until after the
2 first vote had taken place.

3 Questions? Comments? Nick?

4 MEMBER MARAVELL: Well, I'd like
5 to comment on this basically from a producer
6 perspective, because that's the stakeholder
7 group that I represent.

8 You've heard quite a bit of this
9 before, but I think that I don't see this as
10 a majority and minority position. I see us
11 all on the same page. We attempted in Seattle
12 to start a process, and I think it's a process
13 we can be proud of. And we have come together
14 as a group.

15 So I think we need to consider
16 what a farmer is thinking. We've worked with
17 the research community; I have for over three
18 decades, and I understand that certain things
19 just don't get worked out the way they do at
20 the research station. And also understand
21 that going forward we have nothing but
22 extremes in our weather outlook. We're being

1 whipsawed from hottest to coldest, from driest
2 to wettest. There is no such thing as a
3 normal year anymore.

4 My concern is that this could be a
5 win for everyone because some of us got into
6 organic production because we believed that we
7 could have an impact on the larger agriculture
8 in this country. My hope here is that if we
9 were to follow the advice that we're getting
10 from the research community, which is that
11 we're on an edge here of transitioning out of
12 antibiotic control for fire blight -- we've
13 got little bumps in the road here in terms of
14 speed, registration of products, getting
15 established field trials up and running,
16 getting farmers to accept this.

17 And as you can hear from farmers
18 who have worked with the research community
19 the past who testified with us, there are
20 always things that come up that are
21 unanticipated and you have to have that
22 ability to gather some real-time on-the-ground

1 experience, particularly in this case when
2 you're dealing with a biological control agent
3 that needs to be handled very carefully, needs
4 to be applied according to very strict
5 protocols. And it's not easy. I mean I have
6 worked with biological control agents with the
7 research community over the years. Things
8 that work in the experimental stations or in
9 the lab sometimes fall flat.

10 Now what I'm suggesting in my mind
11 is that if we take the time necessary to
12 introduce this with the maximum chances for
13 success, we will have validated a process
14 where everybody can come together. And guess
15 what, this could be adopted by the much larger
16 tree fruit industry. And the consumers who
17 are saying they don't like antibiotics in
18 organic tree fruit can then say we don't want
19 them in any apples or pears.

20 If we make the sledding go pretty
21 rough, it's not going to take well in the
22 producer community. It's not going to be as

1 successful. It's not going to be perceived as
2 an accommodating type of entry whereby
3 innovative practices are being introduced in
4 a positive manner.

5 So for those reasons, the
6 Subcommittee tried to balance all of these
7 concerns. And we have one proposal before us
8 which I feel balances those concerns, but it
9 doesn't balance them in the way that everyone
10 would like to see. I don't see in my mind any
11 division between what we're calling the
12 majority and the minority on this issue. I
13 see, you know, 24 months of difference, and
14 that's it. That's my statement.

15 MEMBER AUSTIN: Thank you, Nick.
16 Colehour?

17 MEMBER BONDERA: Okay. Thank you,
18 Nick. I'm not really sure where to start, but
19 I'll try anyway.

20 You know, I kind of want to
21 respond personally at some level because you
22 and I, Nick, started on the National Organic

1 Standards Board at the same time, the same
2 meeting in Seattle, facing this same topic.
3 And I remember quite clearly; and I'm sure
4 many people that are sitting here were in the
5 room at that time, we went to what I consider
6 -- and this is personal, I understand, but for
7 me it was a compromise, suggestion and process
8 that ended up getting voted through. It
9 wasn't one way or another. And I think that
10 that is probably how this topic can get dealt
11 with, is if the players want to compromise,
12 which means nobody's going to get everything
13 they want. That's what the word "compromise"
14 means.

15 And I feel that if you decide,
16 okay, let's figure out a compromise that we
17 can all work with, then that's one approach.
18 But if the approach is black or white, either
19 or, has to do this, has to do that, it makes
20 it very hard to get everybody that's affected
21 or involved to be working together and
22 strategizing together to come up with

1 something that they can accept and that they
2 can work with.

3 And I think I feel that, you know,
4 in dialogue directly with you you've stated,
5 you know, we came with that compromise that it
6 would go until 2014 to make sure that things
7 have started to move along. And I feel
8 uncomfortable saying, okay, well things have
9 started to move along and therefore let's let
10 them move along further the same as they're
11 moving along. It's like since they've moved
12 along, my personal approach to life is, okay,
13 so let's figure out how to channel them
14 further down the path that we were identifying
15 that we wanted to do.

16 In this particular case we're
17 speaking of tetracycline exclusively. At that
18 point in time we were talking about
19 tetracycline and streptomycin. And I think in
20 today's meeting we were talking about another
21 antibiotic, and people were trying to even
22 open the doors wider. So I think that we're

1 realistically not exactly having the same
2 conversation we had then, but it makes me feel
3 like, you know, are we talking about guiding
4 ourselves down a path and it's getting
5 narrower and we're trying to reach a
6 conclusion, or are we talking about extending
7 the same thing further?

8 And I think those are two very
9 different approaches, honestly and frankly.
10 And to be frank and honest and open with the
11 people in the room, we've had discussions
12 about, okay, what are some of those options?
13 And I think that from my perspective some of
14 the options that are starting to be thought
15 about related to can we consider, you know,
16 looking at the emergency option, because --
17 and I don't know.

18 I don't grow apples and pears and
19 I don't know -- and I could give you pretty
20 detailed personal experience on growing
21 coffee, which is also a perennial, and we had
22 the varroa mite come in -- not the varroa

1 mite. That's honey. When we had CBB come in
2 and there was nothing to work with and nowhere
3 to go, you know, we had to go to the state --
4 they had to go to the Federal Government to
5 get guess what, Beauveria bassiana to be
6 allowed to be used to control the CBB. And
7 that was super hard work and everybody was
8 freaked about it for a long period of time,
9 like almost a year. And we had all these
10 special meetings at the state level with the
11 State Department of Ag and everybody else,
12 because I think that people do get concerned.

13 And I understand quite personally,
14 quite directly how farmers -- you know there's
15 not a clear answer. And if you don't know
16 what the answer is, people get very worried
17 and wearied about these processes. But
18 specifically on this topic I think that we
19 have to -- well, I mean I won't be so specific
20 quite yet. I'll come back around, because I
21 think like in that case the CBB was in one
22 area of the Kona coffee region and it wasn't

1 in the other areas.

2 So a huge percentage of people had
3 zero problem with it. And I think that, you
4 know, then we're talking about a very small
5 segment, and so it's very easy to start
6 talking about that. And I think with this
7 whole topic with tetracycline we're not
8 talking about a very big percentage of the
9 apple and pear farmers that are certified
10 organic. We are not. We're talking about a
11 single-digit percentage.

12 So I think that we just have to
13 make sure that we're talking about what we're
14 really looking at and not sort of trying to
15 make out for the worst case scenario, like
16 everyone's going to lose all of their Kona
17 coffee tomorrow if we don't find an answer.
18 Well, that's true, but we're going to have to
19 work through the process.

20 And I think that my feeling at
21 this point in time with this topic is, you
22 know, if we're not willing to work through a

1 process and we're just going to stand firm in
2 certain conclusions, then I myself don't see
3 that I'm feeling like we're working that
4 carefully together. And I think whether or
5 not I can feel in my heart as an organic
6 farmer with organic integrity that I am
7 representing not just farmers, but the whole
8 organic community, when I try to speak about
9 it. So I need to be careful.

10 And I don't mean this to be a
11 response directly to you, Nick, but I'm
12 following what you said, and I think it's true
13 that now we need to make sure that we are as
14 a group, the 15 of us, coming up with a
15 solution that we all can feel comfortable with
16 and that we work with. And that's my personal
17 desire and goal, and I hope that we all want
18 to do that and can and will do that, because
19 I think that -- you know, I'll just wrap up by
20 saying, you know, as not just a small scale
21 farmer, but I direct market all my products
22 and, you know, losing 40 percent of my income

1 because coffee disappeared like that was not,
2 you know, something I was seeking or wanting.
3 And I can completely understand that, but I
4 can also completely understand, you know,
5 having to directly sell to the consumers, you
6 know, being able to talk to them and/or having
7 to not tell certain truths. So I think that
8 we need to be very careful, is my feeling.
9 And so I think I hope that other people have
10 some things to say that will bring us
11 together, because that's what I would like.
12 Like you said, let's all be together, and
13 that's what I'd like.

14 MEMBER AUSTIN: One of the things
15 that I'd like to point out is that as we sit
16 as a Board and we are trying to weigh the
17 balance for all stakeholders, this isn't just
18 about tree fruit. This is about all
19 stakeholders because this will impact a lot of
20 people and a lot of lives. This Board, eight
21 of the members sitting at these tables right
22 now sat in Seattle, as you said, Colehour.

1 There was an annotation made at that time to
2 extend that expiration date. I was in
3 Seattle. I heard you guys loud and clear, as
4 well as the rest of the industry did. The
5 challenge that you put forth with the
6 annotation to the industry, the stakeholder
7 group, the orchardists, was to go forward and
8 show us that you could make progress.

9 The comments made at that time
10 were that we haven't seen that attitude. We
11 haven't seen you make that attempt. Go forth.
12 We're going to give you to 2014. You come
13 back showing us that you can make some
14 progress and then we will take this
15 conversation back up again. That's exactly
16 what has happened. You know, Ken Johnson, you
17 know, immediately after the Seattle meeting,
18 you know, the Organic Tree Fruit Working Group
19 was put together from individuals across the
20 country. Ken Johnson got an OREI research
21 grant and started working on alternatives.

22 Prior to 2008 the volume of

1 production in organic tree fruit was nothing
2 to compare to what it is today. When those
3 numbers were so small, no government agency
4 wanted to put forth the type of dollars for
5 the research money that would go forward to
6 take and help the researchers and the growers
7 try to find alternatives solutions to this
8 problem. It wasn't big enough of an issue.
9 The chemical manufacturers would not put the
10 money forward because there was no money in it
11 for them.

12 Now there's volume. Now there's
13 acreage. For the organic community as a whole
14 we've known grown to a point where we have
15 adequate access on all different fronts,
16 whether it's at farmers' markets, whether it's
17 sell from your farm to your clients, your
18 customers, your consumers, or whether we're
19 into the main chain source now. We can all
20 take pride in where we've been able to grow
21 together as an organic community, organic
22 today as it stands.

1 To stand here and make the
2 commitment to those organic stakeholders in
3 2011 that that Board made and to turn our
4 backs on the challenges and the promises made
5 to those guys would be a travesty. It's a
6 disrespect to the organic integrity, to the
7 organic integrity of this Board itself and to
8 the stakeholders. We've got the same issue in
9 front of us in 2016 with banana growers and
10 rotenone. The same type of annotation was
11 made to them. Go forth. We're going to give
12 you to this date. Come back. Show us that
13 you've made progress and we'll take the issue
14 back up.

15 So if we're going to make these
16 promises to organic stakeholders, we've got to
17 take and have enough moxie to stand up, be the
18 type of people, show the integrity as an NOSB
19 that our organic stakeholders and community
20 can be proud of and that we as individuals can
21 be proud.

22 It's not that the organic tree

1 farmers, the pear and apple growers, don't
2 hear the consumer concerns. They hear it very
3 loud and clear. David Granatstein brought
4 test results on residues yesterday showing
5 seven different samples that were taken at
6 harvest time with zero detect, applications of
7 one to five applications of oxytetracycline.
8 You know, maybe we can take and send forth a
9 resolution or a demand that the growers start
10 to take more physical results. You know, pull
11 some samples two weeks prior to harvest.
12 Let's start taking and helping and ensure and
13 build the consumer confidence and trust back
14 in what organic stands for.

15 This isn't about trying to take
16 and pull something over the eye of the
17 consumer. We all appreciate the consumer,
18 because if it wasn't for the consumer, the
19 organic farmers wouldn't be in existence
20 today. The flip side of it, it wasn't for the
21 organic farmer, the consumer wouldn't have the
22 access to organic products that are available

1 today compared to where they were 10 years
2 ago.

3 Further comments? Questions?

4 (No audible response.)

5 MEMBER AUSTIN: Nothing? Really?

6 Come on, guys. Jay, you got to have
7 something.

8 (Laughter.)

9 MEMBER FELDMAN: I was waiting.

10 MEMBER AUSTIN: Okay. You're
11 waiting for the go-around? Okay. Mac, you
12 know, I don't think we're getting enough
13 commentary as we thought we might. You know,
14 I guess it looks like we might be ready to do
15 the around the room.

16 CHAIRMAN STONE: Okay. I'll be
17 glad to start. I think I have the similar
18 emotion that I saw and heard in Nick's voice.
19 I think as a farmer and a direct marketer of
20 organic products, and the conversations that
21 I have, and looking people in the eye when
22 they ask why should I buy your organic kale or

1 your organic chicken, and I explain to them
2 the differences. And they don't understand
3 all of the farming practices and all of the
4 angst playing God with a hurt animal and
5 deciding how to treat that animal or work with
6 that animal.

7 So without going off the deep end,
8 I think that we've heard that the growers feel
9 very much they need this tool. We know that
10 the growers that are organic thinkers will
11 avoid this material as much as they can,
12 whether it's pragmatic expense. But they
13 know. I would sense that these growers are
14 not just happy, but proud if they don't have
15 to use this material. But the end of the day,
16 I have reservations that we let retail dictate
17 farm policy because Mother Nature in a great
18 way dictates farm policy.

19 I'm going to support this vote to
20 extend to this because I think the growers
21 need this tool. Because this is a farm policy
22 problem and it has a public perception issue,

1 but it's a farm/Mother Nature policy that the
2 farmers are dealing with.

3 MEMBER WALKER: I would like to
4 begin by saying that this vote is a very
5 difficult vote. Dr. Mildred Smalley, the
6 Vice-Chancellor for Research at Southern
7 University, she said, "Research, if you know
8 the outcome, it is not research." My issue is
9 that even 2016, it appears to me as a
10 researcher, a teacher, more time would
11 probably still be needed.

12 USDA every years requests
13 scientists at the 1890 Land-Grant
14 Institutions, the 1862 Institutions on
15 accountability and adaptability. USDA is
16 concerned about what can we do to get
17 stakeholders to adapt our practices, that they
18 give us these thousands, sometimes millions of
19 dollars worth of grant money. The difficulty
20 that we have found, I can say in the State of
21 Louisiana and maybe in other states as well,
22 is that even if the science is there, getting

1 stakeholders to adapt it is also even a longer
2 and a slower slug.

3 With that in mind, I would like to
4 say what Colehour had said and I had mentioned
5 when were dealing with animal welfare, a
6 consensus is a situation where at the end of
7 the day some will be happy and some will be
8 pissed off. But I'm reminded of the three
9 words of Nike: Just do it. So we are at a
10 point in time that we have to do what we have
11 to do.

12 And I was appointed by Secretary
13 Vilsack to articulate the constituent group in
14 which he appointed me, and that was to be a
15 consumer and a public advocate. And based
16 upon that, I line up behind the consumers and
17 the public interests what I have heard,
18 although how difficult it is, is very
19 difficult. Because I would love to see the
20 extension to 2016, 2018, but I just don't
21 believe that even then it's enough time.

22 So I would like to say that I

1 think in the end that the organic community
2 will be ever stronger and better for whatever
3 the decision that we make.

4 MEMBER FULWIDER: I want to talk
5 first about what I've heard from consumers and
6 then what I have heard from producers.

7 With the consumers there's been a
8 range of those who want complete prohibition
9 of antibiotics, and there is also those who
10 support their local producers working toward
11 eliminating antibiotic use. And we've heard
12 testimony at this and at past meetings that
13 children are willing to eat tasty apples, but
14 not necessarily the one that come from
15 disease-resistant varieties. From producers,
16 not all of the producers are requesting
17 antibiotic use. They don't all need it, and
18 those who do are using it sparingly.

19 I would like to see the university
20 research completed to support the producers in
21 the effort to eliminate antibiotics.
22 Livestock producers in the organic industry

1 are required to use antibiotics to relieve
2 animal suffering. Those treated animals are
3 allowed to live out their lives. They get to
4 go to another farm and the farmers do not
5 necessarily have a financial loss because they
6 can move those animals at the going
7 conventional rate.

8 Orchardists do not have this
9 option. They can't pick up the tree and sell
10 it to their conventional neighbor. And I
11 would much prefer to live next door to an
12 organic orchard that's using antibiotics
13 occasionally under the supervision and
14 oversight of their certifier than to live next
15 to a conventional orchard.

16 MEMBER AUSTIN: Anybody else?
17 Just go around the room now?

18 CHAIRMAN STONE: Yes.

19 MEMBER AUSTIN: Want me to go?
20 Why don't I pass it over to Jennifer and we'll
21 just come back. Jennifer?

22 MEMBER TAYLOR: I think that the

1 Board, this Board with a lot of the
2 conversation that may support any kind of
3 resolution that does not adhere to the
4 previous board's recommendation to withdraw in
5 2014 -- I think that that hinders the progress
6 of the farming population, as well as it
7 doesn't benefit the consumers either. And I
8 think that the thought of the previous Boards
9 have not been reflected and won't be reflected
10 if we continue this process of moving the
11 date. And I think that I would have to
12 represent my role as an advocate for the
13 consumer, the public interest, and I would
14 actually revert back to the 2014 deadline.

15 MEMBER MARAVELL: I would just
16 like to acknowledge what Colehour said, that
17 there's a very small percentage of antibiotic
18 use on organic farms, and that's a testament
19 to the ingenuity and commitment of organic
20 farmers. But I would like to point out at the
21 same time that there is fire blight pathogen
22 on virtually every orchard in the United

1 States and if the conditions are right; and
2 that may only happen once every 5 or 10 years,
3 that that -- you don't know. It's like
4 Russian roulette. You don't know if you're
5 going to get it. The research community may
6 eventually come up with a field test so that
7 you could verify in time, but we're not there
8 yet.

9 And so, Calvin, yes, there will
10 always be a need for research. Well, you need
11 job security.

12 (Laughter.)

13 MEMBER MARAVELL: But I think on
14 balance, you know, getting that research into
15 practical hands is what this resolution, the
16 Committee resolution as currently proposed
17 would do.

18 MEMBER THICKE: Well, I would
19 first say that I was really impressed with all
20 the people speaking on this issue that on both
21 sides was very heartfelt. Everybody believed
22 strongly in what they were talking about. So

1 there is really no bad position on this in
2 some way.

3 Myself, I have the
4 environmentalist position. I'm also a
5 producer. So I look at both sides. Actually
6 I would prefer more of a compromised position.
7 And I may be speaking out of school, but if
8 this proposal fails, there will perhaps be
9 another one that's more of a compromise that
10 would allow an amnesty for three years,
11 meaning if a producer had to use antibiotic,
12 the crop could not be sold that year as
13 organic, but they would remain certified. And
14 since it seems like maybe only once every five
15 years is when they have to spray, the
16 likelihood of having to spray is not real high
17 and they have a relief valve, another
18 opportunity. So I think that's the way we
19 really need to go because it's kind of an
20 amnesty.

21 On the other side, the NOSB has
22 been, because of maybe the turnover, has been

1 saying over and over we're going to end this.
2 And then new Board Members come on and then
3 we're going to end this. So that's more of an
4 amnesia-kind of a program, is that we just
5 keep on forgetting what we said we're going to
6 do and then we say we're going to do it again.
7 And I really can't support that.

8 And from my experience with the
9 field trip, we saw three producers and two of
10 them were very committed and they didn't spray
11 that often. And I am quite certain that the
12 small producers -- and they have a local
13 market that they would be able to make this
14 work. And so I will not support extending to
15 2016.

16 MEMBER BONDERA: I mean I feel a
17 little uncomfortable. I feel like I already
18 said a few words. I mean the only thing I
19 could add to anything that's gone in my mind
20 since we've talked and I guess from the
21 perspective of some of what you all said, I
22 really frankly and honestly and in my heart do

1 not feel this is an either/or kind of
2 discussion. I do not feel it's a both
3 discussion.

4 I really feel like the approach
5 that I at least carry and from my experience
6 dealing with other people who are producers
7 carry, they're not -- producers aren't looking
8 for the bottom line of money. What they're
9 carrying, organic producers are carrying is a
10 different world view of understanding how
11 things work. And you can't only factor in,
12 well, the consumer perspective, well, the
13 farmer perspective, you know, which one are
14 you going to choose? Well, in this case, like
15 in this room at this table you have to
16 acknowledge the fact that the environmental
17 perspective is equally represented, and has to
18 be. And so you're already up to three even if
19 you only count that portion of the people.

20 And so I think for me when we're
21 talking about looking at it, the critical
22 thing is really to make sure we're looking at

1 the whole picture of what is involved and
2 what's affected and making sure that we're
3 thinking about those issues. So not only does
4 the fruit carry that whatever we're going to
5 call it, contamination or whatever -- so you
6 have that product and you're eating it, but,
7 okay, is it on the leaves? Okay. Is it going
8 to be there later in the soil? And we're
9 talking about soil health. And we're talking
10 about a lot of broader issues, you know, water
11 and things like that.

12 So I think we need to make sure
13 we're considering all of those factors and not
14 one component. And that's how I look at and
15 think about organics as a farmer. So I think
16 that that's all I'll add. Thank you.

17 MEMBER FAVRE: For my part this
18 has been a very difficult decision. I don't
19 know if it's a blessing or a curse that I was
20 not on the Board when some of those earlier
21 decisions were made. It would be very easy to
22 wish that previous boards had taken this

1 decision off of our plate so that we didn't
2 have to make this decision.

3 But having said that, I think that
4 the difficulty in this is that we've been
5 dealing with in some cases people that have
6 been getting sound bites of information
7 converted to black and white issues when this
8 is a very nuanced issue with shades of gray
9 answers. And I've said this multiple times in
10 our conversations, if these problems were easy
11 to be solved, they would have been solved
12 already. So it's important for us to not make
13 a decision based on not having the full
14 picture.

15 I also think it's possible that
16 the farmers that would be impacted would feel
17 that this was a fairly capricious decision on
18 our parts when there's finally progress being
19 made. So from my perspective, I would like to
20 have the research completed. I would like to
21 give the farmers the time to have the tools in
22 place so that we aren't potentially

1 devastating their operations. And let's be
2 very clear: These are individuals with
3 families and livelihoods that are looking at
4 being potentially significantly damaged either
5 in the short term or permanently based on
6 these decisions.

7 MEMBER BECK: So I had to prepare
8 a statement. I'm going to read it, because
9 otherwise I'll get nervous. I also feel like
10 this is very -- it has me nervous, very
11 nervous because so many people's interests are
12 at stake here. So I'll go ahead and just
13 read.

14 So I respect and acknowledge the
15 concerns of all who will be impacted by this
16 proposal. I'll state that I am unequivocally
17 in favor of an extension until 2017 at the
18 earliest. However, in an attempt to
19 compromise I'm in favor of voting for the
20 revised and annotated centrist proposal with
21 a 2016 expiration date. This proposal was
22 revised to take into account the very real

1 concerns of both consumers and farmers alike.
2 And as others have indicated, we have a real
3 opportunity today to pass a proposal that is
4 relatively acceptable to all who are members
5 of this organic community.

6 The arguments that have resonated
7 with me over the past few days include some of
8 the following: The U.S. domestic organic
9 apple and pear industry must be preserved.
10 We're talking about farmers' livelihoods who
11 have been following their OSPs and have been
12 in compliance with the National Organic
13 Program. The conversion of organic acres back
14 to conventional acreage is for me, and for
15 many probably could be quite heart wrenching.
16 And honestly, to shrink the organic industry
17 to me would be a real shame. I also feel that
18 the arguments that fact-based expiration dates
19 based upon the availability and outcome of
20 research must be proposed. The tendency to
21 propose arbitrary expiration dates for the
22 sake of compromise has not been a good

1 practice.

2 Also the work of the current
3 research is very promising and I commend the
4 progress that's been made. I wholeheartedly
5 feel that the researchers should be provided
6 the adequate amount of time needed to complete
7 their studies and to allow the time for
8 growers to learn about and adopt these
9 alternatives.

10 And lastly, I feel that there is
11 an opportunity to better educate consumers so
12 that, as Tracy was saying and others, they
13 have the holistic picture of both sides of --
14 or the whole story. And I think that in many
15 instances it feels that there's just an
16 opportunity there for them to know the
17 entirety of the issues that are on the table.

18 And so that's what I've got for
19 you all. Thank you.

20 MEMBER SONNABEND: Thank you.
21 Well, we here as Board Members have listened
22 over the last three days, and for some of us

1 much longer than that, to everyone's concerns
2 on this issue. And we all agree, as was
3 stated at the outset, that really every one is
4 appointed to this Board to try and make the
5 organic community better and try and make the
6 organic community grow from whatever way we
7 feel is appropriate.

8 The consumers in the room feel
9 understandably concerned about their food and
10 feel that efforts to remove this from the list
11 have been stalled several times. I think
12 antibiotics potentially has some real reasons
13 to be concerned for, and it goes beyond what
14 the science says or doesn't say and into just
15 what people feel in their hearts about this
16 going forward. Growers feel dis-empowered
17 from this process because of being closed out
18 from commenting entirely in 2008 and feel like
19 they weren't heard in 2011.

20 I think that really both growers
21 and consumers are the victims here. They're
22 the victims of a system that doesn't

1 prioritize organic research and development of
2 alternative products and the victims of just
3 not having political power to be able to force
4 these through our government/corporate system.

5 In 2011, a statement was made for
6 growers and consumers to work together towards
7 the ending the use of this material. Since
8 that date this has happened with some success.
9 In the grower community we're committed to
10 following the trajectory that we're on towards
11 tools for everyone to have success with
12 alternative control measures, but we're not
13 there yet. For pears in the Western U.S., for
14 apples in the Midwest and East, and certain
15 microclimates that are different than the ones
16 the materials have been tested in already.

17 Key products are not even
18 registered yet and will not be by 2014
19 expiration. Therefore, the grower community
20 feels that we need to have the extension so
21 that growers and consumers of organic fruit
22 can reach together towards an end use of this

1 material. Any steps we can take to achieve an
2 extension and reassure consumers at the same
3 time we are willing to take. This is the
4 reason for adopting some of the centrist
5 annotation language into our proposal.

6 As I said yesterday and will say
7 again clearly, that with two more years this
8 will be the end of it. Disruption to people's
9 orchards and livelihoods is too depressing for
10 me to contemplate. After spending my entire
11 career on having sound and sensible rules for
12 organic consumers and farmers alike, I just
13 cant see that ripping their organic orchards
14 out, period, or converting back to
15 conventional is appropriate at this time. So
16 therefore I am going to support the proposed
17 motion for an extension.

18 MEMBER FELDMAN: Thanks for
19 calling on me earlier, Harold. I don't have
20 a prepared statement and I'm not even sure
21 what more I can add to the discussion. I
22 wanted to give you more of a sense of how I

1 personally come to where I am on this.

2 You know, I see, and I'm sure you
3 all see similarly in your own decision making
4 process, you sort of -- I approach this on
5 different levels. I approach this from a
6 science perspective, science and policy
7 perspective, I approach this as an advocate
8 representing constituents who like many of you
9 have mentioned, and I approach this as a
10 parent of children that grew up in an organic
11 household.

12 You know, the first thing that I
13 do usually when I am confronted with these --
14 really all of them are difficult decisions;
15 this one is particularly difficult -- is start
16 with the science. And when we first got on
17 the Board, our class, we didn't have the
18 technical reviews that we have today. We were
19 doing a little scrounging around for our own
20 research, and John was sending us down rabbit
21 holes, and other people had their own charts
22 of how to get information. And at one point

1 we had six rabbit holes lined up that we would
2 sort of follow.

3 And we didn't even know where the
4 historical records were on the decisions that
5 had preceded us. And we all labored over
6 that, but we yearned for information and it
7 started with what had happened before, what
8 had previous boards done, what was the
9 substance around those discussions, what did
10 the science say, and then where is the new
11 science on this? And, you know, I know that
12 doesn't help when you're in an immediate
13 crisis, because a lot of crises, as I've
14 experienced working on the conventional side,
15 are born out of decisions that keep going and
16 going and going and never stop. The crisis is
17 quite predicable, but it's identified as an
18 emergency and unpredictable.

19 And we see a lot of this crop
20 resistance where conventional monocultures
21 result in resistance that is very predicable.
22 But some people wake up and say, oh, I had no

1 idea my crop was going to fail and I don't
2 have a pesticide I can use and I need to be
3 able to use an unregistered -- or a chemical,
4 one that's not registered for this use.

5 So I say all this because you
6 never know when you're at the right spot to
7 make a decision. You can't know it while
8 you're in it. And I find that over and over
9 again and I tend -- some of the people I
10 represent say I'm too flexible, though I know
11 you guys wouldn't see it that way.

12 You know, and so the question
13 really is how do you really feel comfortable
14 with the decision you make after having been
15 in a conversation, tracking the history of the
16 Board on this issue for so many years? Even
17 before 2008, you know, the original Board
18 grappled with this.

19 As an advocate, as you all do in
20 your different groups you represent, you have
21 to sort of look at where the people are that
22 you're representing, and everybody I think is

1 doing a good job of doing that. And, you
2 know, that was built into the statute. The
3 statute really forces us to communicate with
4 each other so that we can try to find a way to
5 do what others have said, grow the industry,
6 grow organic agriculture.

7 And so we do the best we can to
8 explain the viewpoint of the people that we
9 represent. And on the public interest side we
10 search around for bringing science into this
11 discussion, because we know the need is there
12 and we know the people that rely on materials
13 can express themselves and need to defend what
14 they do and their livelihoods and their
15 families and so forth. But we have to balance
16 that with the science. So I'm really pleased
17 to see in this last meeting in Providence and
18 now in this meeting we have the benefit of
19 bringing in people steeped in the science who
20 can help us make these tough decisions.

21 And I think on the issue of
22 antibiotics, it's one that I really didn't

1 expect the level of concern when I first dug
2 into this. I figured this was a small use,
3 that this -- you know, we had taken care of
4 animal agriculture. The medical community was
5 concerned about, you know, therapeutic uses,
6 clinical uses. How could this really make
7 that much of a difference? And I was sort of
8 shocked to learn the level of concern when I
9 spoke to about a dozen physicians before
10 someone referred me to Dr. Morris.

11 So the science -- and I'm not
12 going to obviously go through the science --
13 but the science I think is clear. The
14 advocacy and the positions that people take in
15 the environmental community is really often
16 unpopular, historically. I mean, Nick, you
17 referred to climate change and, you know,
18 environmentalists took a lot of abuse in
19 raising climate change in many years, earlier,
20 you know, that their models were no good and
21 this and that, whatever. We took a lot of
22 abuse in advocating organic agriculture in the

1 '80s.

2 And so, you know, that need to
3 stay in touch with the people that are
4 supportive of organic, buying organic,
5 consumers, environmentalists that are making
6 the case for organic growth, why it's so
7 important and all these arenas from, you know,
8 trying to protect against global climate
9 change, drought resistance, protection of
10 soil, health, water, air, food, et cetera.

11 So in many ways my constituents
12 are really shareholders of the organic
13 industry. They're shareholders and they're
14 investors. And you know how mad shareholders
15 can get sometimes, right, if you don't deliver
16 the goods. You know, and investors want to
17 see the entities they invest in do the right
18 thing, or make money, or do something. But
19 they have a stake, they have a stake in
20 certain things happening and they're not
21 disconnected from what they have a share in or
22 what they have an investment in.

1 And I'm seeing, you know, as I
2 travel around the country, I talk to people
3 everyday on the phone from around the country,
4 that that stake that people feel in organic is
5 very strong. And so there is this element of
6 feeling that, either from their own ignorance
7 or for whatever reason, that they don't have
8 the right information or they were misled on
9 this particular ingredient.

10 Now, as a parent, you know, when
11 you raise kids in an environment with organic,
12 you have a lot of discussions with your spouse
13 about whether it's worth the investment,
14 especially if they're not coming out of an
15 environmental background. And so you have not
16 only abuse at work from people beating up on
17 you, you have the abuse of your constituents
18 who don't feel you're hanging tough enough.
19 Then you go home in the evening and you have
20 to argue for putting a high percentage of your
21 family budget into purchasing organic food.
22 So I've been abused up and down the line here.

1 It's a good thing.

2 But I do have a lot of agreement
3 with my wife about how important it was and is
4 to raise our kids with organic, but I'll tell
5 you funny story. And, you know, they know all
6 the reasons why that go well beyond what they
7 put in their mouth. They understand I started
8 out working on organic because I was mostly
9 concerned about farm workers and farm worker
10 exposure to pesticides in the fields and that
11 we could reduce our reliance on chemicals in
12 the workplace and protect workers. And, yes,
13 we could protest consumers, but that wasn't
14 ultimately -- at least originally my concern.

15 And so my kids went out on their
16 own. They went to college. They got their
17 own places. And I get a call one day from --
18 I forget whether it was my son or daughter --
19 and my daughter goes, dad, I just got back
20 from the store and I was standing over the
21 dairy case and I couldn't believe it, butter
22 was \$5 a pound organic and there was butter

1 sitting right next to it was half the price.
2 I said what did you do? Oh, I bought the
3 organic, but I can't believe I had to pay that
4 much for it.

5 But the important thing is that I
6 want you guys to understand, and I think you
7 do, that the investment that people have in
8 what you guys do as growers is incredibly deep
9 and even young people like that can understand
10 that they have to dig deeper in their pockets
11 to support this. So we on the flip side might
12 need to do things that aren't easy, aren't the
13 things we would rather do, but we believe we
14 need to do to retain that trust and support
15 among the people that in the past generation
16 and the next generation will support organic
17 production.

18 So with that, I apologize to any
19 harm that may be caused by my vote. That is
20 not the intent. I believe that in the end I
21 pray and believe that we will work through
22 this, at the same time that I feel deeply that

1 this is a necessary step to protect people's
2 trust and faith in organic production as we
3 move forward. Thanks.

4 MEMBER RICHARDSON: This is tough,
5 you know, and I really respect all of the
6 comments that have gone before me. So
7 passionate. Zea, I love what you said.

8 So let me be clear for the record
9 that I have not read or heard any scientific
10 peer-reviewed evidence that persuades me that
11 there are residues of oxytetracycline in or on
12 organic apples and pears, and I'll continue to
13 eat U.S. organic fruit.

14 I urge, at the same time, residue
15 testing on harvested fruit as soon as we can,
16 this year starting, to refute the inaccurate
17 and misleading information that presently is
18 in the media and on the internet. However,
19 consumers assume that there are no antibiotics
20 used in organic agriculture and the ongoing
21 use of this antibiotic obviously undermines
22 consumer confidence in the integrity of the

1 U.S. organic label, especially, as I say, in
2 the face of all the recent media frenzy filled
3 as it is with half-truths and inaccuracies.
4 You can tell that makes me mad.

5 As a scientist, I understand that
6 research takes many years to provide results.
7 Indeed, it may be years before we have a clear
8 understanding of the efficacy of new products
9 for controlling fire blight, especially in the
10 face of climate change. And therefore, if we
11 pass this, I expect that continued extensions
12 for use of oxytetracycline may be requested
13 because many will wait to make changes in
14 their agricultural practices and won't make
15 the changes in their agricultural practices
16 until they're really pushed to do so. That's
17 been my experience in agriculture over the
18 last 30 years.

19 Meanwhile, antibiotic use is not
20 permitted in European or Canadian organic
21 apple and pear production. In the broader
22 context -- and it's important to look at this

1 -- tetracyclines are critically valuable in
2 world public health and the low-level, sub-
3 therapeutic intermittent application of
4 antibiotics in production of apples and pears,
5 whether conventional agriculture or organic
6 agriculture, poses a serious health risk for
7 development of bacterial resistance to this
8 important antibiotic, and its use in fire
9 blight control should be rapidly phased out if
10 we're to continue to use this class of broad-
11 spectrum antibiotics for human health.

12 I recognize that my vote against
13 this recommendation will have serious economic
14 impacts on many hard-working farmers, and I'm
15 sorry about that.

16 MEMBER DICKSON: I've been coming
17 to these meetings since 2004, and you know,
18 this is obviously a board that only works on
19 complicated, gray, difficult issues, and I
20 think this is the hardest one I've ever seen
21 and thought about. And, you know, I want to
22 start out by saying that I'm completely

1 humbled to have seen so much openmindedness
2 and willingness to engage and argue and open
3 our minds in hallways and at dinners and in
4 this room and at this podium and, you know,
5 the candor and the courage, frankly, has been
6 amazing.

7 As the retailer on this Board I
8 have approached this issue from several
9 different perspectives, but at the end of the
10 day, one where, you know, I've talked to both
11 a lot of shoppers and customers and the people
12 who deal with them directly, and I've talked
13 directly with a lot of growers and the people
14 who buy products from those growers. And as
15 a retailer we consider both our customers and
16 our growers and our suppliers to be
17 stakeholders in our business. And in an ideal
18 world we make decisions that satisfy both of
19 those groups and help them grow together and
20 add value to the organic supply chain.

21 You know, my phone started ringing
22 on this issue months and months ago. Our

1 buyers out in California and Washington and
2 the Upper Midwest and the Northeast have all
3 heard from their growers that are at serious
4 risk. And our customers who've heard other
5 messages are frankly and correctly shocked
6 that antibiotics are part of organic
7 production. That is, you know, a really big
8 disappointment for any customer who hears
9 about this issue. That's not a question.

10 You know, in deliberating on this
11 issue as a company, the only way we could even
12 feel comfortable explaining to our customers
13 that we would support an extension on the use
14 of tetracycline is if we could say there is a
15 concrete hard-dated end time for this and this
16 is not going to happen again, that there is,
17 you know, 24 extra months that are there for
18 a very specific reason, and after that we
19 cannot support any extended use of this
20 material.

21 Sometimes that's a satisfactory
22 explanation. A lot of people do, you know,

1 just like within this Board -- none of those
2 conversations are black and white. None of
3 them are simple. We all stood in orchards on
4 Monday morning and talked to growers who were
5 showing us their blocks of trees that had been
6 eviscerated by fire blight. You know, I don't
7 know if anyone on the Board talked to the
8 barista across the street this morning, but he
9 was really worked up about this issue. And,
10 you know, so was my mom and so are our
11 neighbors and our families and our friends.
12 And they're hard conversations, just like the
13 one we're having right now.

14 Like I said, I believe the use of
15 antibiotics in livestock or in terrestrial
16 agriculture is not consistent with consumer
17 expectations of organic agriculture, and I
18 think we all agree on that. Antibiotic
19 resistance is a real problem and one of the
20 reasons that we should ensure that antibiotics
21 are not part of organic agriculture. However,
22 consumers and our stakeholders expect this

1 Board to make a decision that carefully
2 balances the needs and expectations of many
3 different stakeholders, consumers, retailers,
4 growers, certifiers, the environment.

5 And in this case, you know, the
6 question is not whether to ban antibiotics
7 from tree fruit production. The question is
8 when and how, and can we give the growers a
9 bridge that, you know, balances the very clear
10 right thing to do and expectations of
11 consumers with the survival of those growers.
12 And, you know, I don't necessarily have
13 anything dramatic or new to add to the
14 conversation, but just to say that this has
15 been excruciatingly difficult to process for
16 everyone here, and I do plan to vote yes on
17 this proposal.

18 MEMBER FOSTER: So I remember that
19 first year, too, Jay. And as I remember it,
20 I just was mapping the rabbit holes. And then
21 we all went down them together, for better or
22 for worse. But I'm glad you mentioned that,

1 because it reminded me of those early days,
2 which shocks me to say because it seems like
3 just eons ago already, and I know it was just
4 a couple of years ago.

5 But I still feel so fortunate to
6 be part of the process. And as I've said many
7 times in these meetings in the last few years,
8 I feel endlessly privileged to be part of the
9 process, as agonizing as it is sometimes for
10 a whole bunch of reasons. But even today I'm
11 just in awe of our collective wisdom and
12 relative civility. It's very meaningful to
13 me.

14 So I'm really glad to see what I
15 think of as really robust, promising,
16 inevitable progress toward removing
17 tetracycline off the List entirely, and I
18 think we're really close. No surprise, I'll
19 be voting in favor of the extension proposal.
20 I think that that progress has been genuine
21 and heartfelt and sincere, and I think we owe
22 the growers that are part of our community

1 that institutional good faith that we've shown
2 other parts of our other constituencies in the
3 past.

4 I know, you know, as a group or as
5 individuals, we/us as individuals, there's
6 going to be criticism, and that's kind of --
7 we all kind of signed up for that. And it's
8 not the first time. Won't be the last. None
9 of us like it, but no matter which way it
10 goes, that's part of the deal.

11 What can I say other than the Dude
12 abides.

13 (Laughter.)

14 MEMBER FOSTER: Obviously a lot of
15 facets here, a lot of interested parties. And
16 it's as it should be. That's our process,
17 albeit if it's imperfect. As most of you
18 know, I'm generally not compelled by kind of
19 reductionist or extremist arguments. They
20 just don't hold a lot of truck for me, of any
21 stripe, either side, but especially those that
22 appear to be designed to kind of cloud things

1 over. I don't care for that. Yes, I don't
2 care for the intent. I don't know, it's just
3 not compelling to me, so I tend not to put a
4 lot of water in that bucket.

5 Those on the Board who have been
6 on conference calls on Crops or Handling the
7 last few years have heard me say that, you
8 know, materials like this -- this is a good
9 example -- used very sparingly, strategically
10 and then only in the context of a very
11 thoroughly vetted organic system plan, system
12 of inspection, verification, reinspection, and
13 that verified OSP and 205, 206 -- all those
14 cascading requirements for pest management, I
15 think, is in the context of a very solid
16 regulatory system that I have faith in.

17 Again, not surprisingly, I don't
18 want to lose that context. I think that's an
19 essential context. And when we talk about
20 materials in Subcommittee, or in a larger
21 context like this, I think we forget that they
22 exist outside of a vacuum, and I want to keep

1 driving that point home. I think that's a
2 very important point.

3 I've heard a lot of kind of word
4 choices and syntax that seem to drive us away
5 from the critical question. They're driving
6 us toward implication. And as one of my good
7 friends used to say, innuendo and out the
8 other.

9 (Laughter.)

10 MEMBER FOSTER: And I would much
11 rather just hear direct answers to direct
12 questions. That would be much more helpful
13 for me in the future.

14 So since the proposed use
15 extension, it doesn't feel to me to be really
16 based in developing science, really, or even
17 method. It's I think a derivative of
18 compromise. I really anticipate, predict, if
19 you want to call it that, that the existing
20 2014 deadline is going to fall far short of
21 what's going to be required to register, test,
22 implement, distribute, manufacture, all those

1 things. That commercialization process is not
2 going to be there for these alternatives, I
3 don't think. I'd be happy to be proven wrong.
4 I really would be. I just don't see it.
5 That's not my experience in the past.

6 I share some others on the Board's
7 opinion. I don't know that 2016 is enough,
8 but it could be. I'm willing to move the ball
9 a little bit farther if it needs to be. I
10 think we're close and I'd like to see that.

11 I think the vagaries, variability
12 of the crops, the plant pathogens at hand --
13 I don't think the existing deadline allows a
14 realistic commercial scaling. It seems more
15 than wishful thinking to me. It seems
16 fantastic in the truest sense of the word.
17 Remote from reality I think is one definition.
18 It doesn't feel realistic to me.

19 I think a lot of the resistance
20 concerns can be very serious. I believe those
21 have been sufficiently addressed by the
22 science we have heard. That's my opinion. It

1 doesn't sound to me like an additional two
2 years would cause anything but -- and I had to
3 write this part down -- an unlikely
4 possibility of unlikely transfer of something
5 that is unlikely to exist more than a few days
6 every few years in any given relevant
7 environment. There's a lot of things that can
8 happen. The world's an imperfect place.
9 Things are going to happen.

10 It doesn't sound to me like this
11 is worth the penalty that a significant
12 portion of our own community has been counting
13 on for a while, and I think we're so close.
14 I just don't see penalizing that cohort, that
15 part of us, with certain undue burden and
16 hardships because of a chance of a chance of
17 a chance of a concern, especially not when we
18 are so -- I do think we are really close, and
19 to remove the concern entirely.

20 And as others have pointed out,
21 not just from the organic community, but if
22 these work in organics, we have lots of

1 empirical evidence in the most dyed-in-the-
2 wool conventional environments, like the
3 valley I'm used to growing in. We've got a
4 lot of experience that the benefits of organic
5 reach far beyond organic ground. And this
6 could be another great example of that, that
7 as we develop these tools for organic, the
8 rest of conventional agriculture can move a
9 little bit closer to us. That's what I really
10 like about this.

11 I know we are all working to
12 remove the materials completely. We all agree
13 on that. We're really close. And it's in
14 this context -- and context is critical to the
15 decision -- that this extension makes
16 reasonable process and it makes reasonable
17 sense. So I plan on supporting it. Thank
18 you.

19 MEMBER AUSTIN: Okay. I'll wrap
20 us up and then I guess then we'll take it to
21 a vote. As all of you in the audience could
22 hear, there's a lot of passion from the 15

1 members of this Board. Everybody is voting
2 with their heart. Everybody is talking with
3 their stakeholders at their best interest. I
4 think the science came from two different
5 directions and I think there was compelling
6 evidence to displace some of the concerns, I
7 think both from Dr. Stockwell's presentation
8 -- I also think from the residue sampling that
9 Granatstein was able to take and provide for
10 us yesterday.

11 I think the point that we're
12 missing is that the organic growers right now
13 -- this is not a carte blanche use. Not every
14 organic acre of apples and pears is getting
15 treated. Those that need the treatment are
16 the ones getting treated. And as has been
17 pointed out, it's pretty minuscule, but yet it
18 could have a serious impact to handlers, to
19 producers, to processors, wholesalers,
20 retailers and ultimately the consumer. I hear
21 the concerns with those that have to represent
22 the consumers.

1 There's been a lot of things going
2 on in the news that have got the consumers
3 scared. They've got them wondering about the
4 safety of their food, but has anybody shared
5 with them the information that Dr. Granatstein
6 just provided to us yesterday, that out of
7 seven samples there was zero detectable
8 residues? The one stat that was used was what
9 the development of the standards by the EPA,
10 which is totally different than what any
11 industry will use to sample residues on a
12 normal basis, would be. And that's misleading
13 and it's not based on what I feel is the way
14 we should be presenting the information.

15 I also think when it comes those
16 that have to take and stand up and protect the
17 rights and the concerns of the consumers have
18 to vote with their conscience and with their
19 stakeholders. I think the one opportunity
20 that we have that we're missing is that by
21 denying the ability to move forward, by
22 denying the opportunity to increase the

1 residue sampling, by showing that the concerns
2 -- maybe are real -- maybe they're not as
3 large of a concern as they're being made out
4 to be. And I'm not going to sit here and say
5 either way. I'm just making the statement
6 that there's an opportunity.

7 I think the opportunity is for us
8 as collective organics stakeholders --
9 shareholders, I think, Jay, is the word that
10 you used -- I think all of our shareholders or
11 stakeholders have a place at the table. They
12 all have an invested interest in this process.
13 They all have an invested interest of where we
14 have brought the organic industry today from
15 where it was 10 years ago, 20 years ago, 30
16 years ago. These growers have put a lot of
17 blood, sweat and tears into this. They're up
18 in the middle of the night frost-protecting
19 their crops this time of the year. They're
20 out in the middle of the winter. When you're
21 sitting in your nice warm rooms, offices,
22 businesses, they're out in the cold freezing

1 their butts off taking and pruning, protecting
2 their crops, doing the things that need to be
3 done in order to protect the trees, prune the
4 trees. It's a way of life for them.

5 This isn't just about taking and
6 putting something out that maybe it's right,
7 maybe it's wrong. It's a way of life for
8 them. They're doing this because they're
9 passionate about it, just as each of you in
10 this room are passionate about what you do.

11 The final thing I want to say is I
12 think if we don't move this forward we're
13 going to miss an opportunity for the organic
14 communities from all fronts to come to the
15 middle to find balance. If we don't find
16 balance, we're turning our backs on the very
17 essence of what the organic principles stand
18 for.

19 The final point to state is I'm
20 proud to be sitting on this Board as a
21 handler's rep listening to everybody's
22 passion. But even further, I'm proud to be a

1 member of one of the truest, the purest
2 environmental groups in this country, and that
3 is the American farmer. Not just the American
4 farmer, but the organic farmer, because the
5 organic farmers are passionate about what they
6 do. They have to depend on that life, on that
7 soil, the land, for their living. Are they
8 going to intentionally go out there and do
9 something that's going to destroy that ground?
10 Hell no. They're not. They're going to
11 protect it with every fiber in their body.

12 You know, and I'm sorry, but I'm
13 starting to get a little bit passionate, and
14 I apologize. But it's an issue. And we're
15 going to disrupt people's livelihoods if we
16 vote and vote this measure down. I will vote
17 for it, and I'm going to vote for it not on
18 behalf of the grower, not on behalf of the
19 apple and the pear people. I'm going to vote
20 for it on behalf of the organic community,
21 because it's the right thing to do.

22 Any further discussion?

1 (No audible response.)

2 MEMBER AUSTIN: Mr. Chair, I think
3 we're ready to vote.

4 CHAIRMAN STONE: Well, I want to
5 thank all of you all. I know that those of
6 you in the room could feel what just happened
7 here. So we'll go for a vote. Jean, we start
8 with you.

9 MEMBER RICHARDSON: No.

10 MEMBER DICKSON: Yes.

11 MEMBER FOSTER: Yes.

12 CHAIRMAN STONE: And let's go slow
13 to make sure we get this one right.

14 MEMBER WALKER: No.

15 MEMBER FULWIDER: Yes.

16 MEMBER AUSTIN: Yes.

17 MEMBER TAYLOR: No.

18 MEMBER MARAVELL: Yes.

19 MEMBER THICKE: No.

20 MEMBER BONDERA: No.

21 MEMBER FAVRE: Yes.

22 MEMBER BECK: Yes.

1 MEMBER SONNABEND: Yes.

2 MEMBER FELDMAN: No.

3 CHAIRMAN STONE: Yes.

4 Six no, nine yes. Motion fails.

5 Jay?

6 MEMBER FELDMAN: I'd like to
7 introduce a motion, if that's okay -- and I
8 think Michelle has it -- on tetracycline. I'm
9 sorry. I just need a minute here. Sorry, I
10 lost it.

11 Why don't we go to the resolution
12 first? Sorry. I'll be prepared for this.
13 Zea has a resolution that follows on the
14 previous motion.

15 MEMBER SONNABEND: Yes, we
16 proposed a resolution along with our original
17 motion, and I am looking for it. Okay. Even
18 though the motion for extension fails, I feel
19 like we need to have some resolution to
20 indicate the need for high priority for
21 research still. And so I would like to put
22 forward the amended motion that I circulated

1 to everybody. It says, "The National Organic
2 Standards Board is committed to the phase-out
3 of this material. In addition, the Board
4 strongly advocates to USDA a high priority for
5 increased support for research into the
6 alternative practices and materials." It
7 really should say "for control of fire
8 blight."

9 Is there a second?

10 MEMBER BONDERA: Second.

11 MEMBER RICHARDSON: Second.

12 CHAIRMAN STONE: Discussion?

13 Sorry, Nick?

14 MEMBER MARAVELL: Yes, just
15 because we sort of changed the context a
16 little bit, we may want to say, "The National
17 Organic Standards Board is committed to the
18 phase-out of either tetracycline or
19 antibiotics in organic practice," whichever --
20 you know, we just sort of "this material." I
21 mean, it may be sufficient, it may not be.

22 MEMBER SONNABEND: That's true. I

1 guess there's no motion to precede it that
2 passed, so I guess we would say phase-out of
3 tetracycline. I accept that as a friendly
4 amendment. Does the second, whoever seconded
5 it?

6 MEMBER BONDERA: Yes.

7 MEMBER SONNABEND: Okay.

8 MS. ARSENAULT: Zea, instead of
9 "this material" you want to insert
10 "tetracycline?"

11 MEMBER SONNABEND: Yes, instead of
12 "this material" in the first sentence.

13 MEMBER FELDMAN: Do you want to
14 ask for the vote?

15 MEMBER SONNABEND: Well, I thought
16 Mac was supposed to ask for the vote, but I
17 think --

18 CHAIRMAN STONE: Sorry. I was
19 making sure Michelle spelled it right while
20 everybody's watching.

21 Any further discussion?

22 Okay. We'll call for the vote,

1 and we start with Joe.

2 MEMBER DICKSON: Yes.

3 MEMBER FOSTER: Yes.

4 MEMBER WALKER: Yes.

5 MEMBER FULWIDER: Yes.

6 MEMBER AUSTIN: Yes.

7 MEMBER TAYLOR: Yes.

8 MEMBER MARAVELL: Yes.

9 MEMBER THICKE: Yes.

10 MEMBER BONDERA: Yes.

11 MEMBER FAVRE: Yes.

12 MEMBER BECK: Yes.

13 MEMBER SONNABEND: Yes.

14 MEMBER FELDMAN: Yes.

15 MEMBER RICHARDSON: Yes.

16 CHAIRMAN STONE: Yes.

17 Vote is unanimous.

18 MEMBER FELDMAN: Okay. Mr. Chair,

19 sorry for this, but that was the appropriate

20 order. I'd like to introduce a motion and

21 then we can have a discussion on this. You

22 should all have an emailed copy of this, and

1 we have it up on the screen as well.

2 This is tetracycline for use on
3 fire blight in apples and pears. I won't read
4 all of this, but I'll read portions of it.
5 And if you'd like to make any amendments to
6 it, we can discuss this.

7 "But the Crop Subcommittee
8 proposes to let the tetracycline listing of
9 205.601 expire and recommends that the NOP
10 declare an emergency program for fire blight
11 control in apples and pears running from
12 October 21, 2014 to October 21, 2017.

13 "In order to minimize potentially
14 devastating loss of trees during the period
15 that growers believe is necessary to make the
16 transition, the NOSB recommends that the NOP
17 facilitate use of emergency provisions of the
18 Organic Foods Production Act."

19 And then we explain in here the
20 legal authority under 7 CFR 205.672, "when a
21 prohibited substance is applied to a certified
22 operation due to a federal or state emergency

1 pest or disease treatment program and the
2 certified operation otherwise meets the
3 requirements of this part, the certification
4 status of the operation shall not be affected
5 as a result of the application of the
6 prohibited substance, provided that any
7 harvested crop or plant part to be harvested
8 that has contact with a prohibited substance
9 applied as a result of the federal or state
10 emergency pest or disease treatment program
11 cannot be sold labeled or represented as
12 organically produced."

13 So the motion is, "without any
14 change to the NOP rule and without extending
15 the 2014 expiration date of tetracycline on
16 the National List, the NOSB advises the
17 Secretary to create a national emergency
18 disease treatment program for fire blight
19 control in organically certified apples and
20 pears authorizing the use of oxytetracycline
21 until October 21, 2017, in accordance with
22 205.672 and 7 U.S.C. 6518(k)(6).

1 "The NOSB advises the Secretary
2 that such a program will require a certified
3 farm to document to its accredited certifier
4 that non-antibiotic control methods had
5 already been employed, that conditions
6 indicate the need for treatment, such as
7 predictive disease outbreak on models based on
8 temperature and moisture conditions and the
9 stage of growth of the full trees or extreme
10 weather conditions, the date and locations of
11 the trees sprayed with oxytetracycline, and
12 the procedures to prevent commingling of any
13 resulting non-organic harvested product with
14 certified product.

15 "If growers use tetracycline
16 during this period, they will not be able to
17 sell the treated crop as organic, but they
18 will not lose their certification if the
19 certifier finds they have implemented an
20 organic systems plan."

21 And then there's a recommendation
22 to the NOP on guidance on alternative

1 practices that fit into several categories.
2 I'm not going to read them all. And this
3 comes partially out of the centrist proposal.
4 "Implement a systems-based approach that
5 integrates prevention, monitoring and control
6 of fire blight, monitoring techniques, control
7 techniques, steps to address long-term
8 strategies, monitoring of the orchard for fire
9 blight to determine if it is likely to become
10 a threat to the orchard, and informing of the
11 certifier about antibiotic applications."

12 So that is the motion and I'm
13 looking for a second on that.

14 MEMBER RICHARDSON: I'll second
15 that.

16 MEMBER FELDMAN: Discussion?
17 Thank you. Go ahead.

18 MEMBER SONNABEND: If no one
19 raises their hand, I guess I start. I have
20 mixed feelings about adopting such a motion.
21 And while conceptually I would like the
22 emergency way out for the growers who feel it

1 would help them, I am completely opposed to
2 this very prescriptive and detailed guidance,
3 stuff that's in here because this was never
4 vetted to any of the organic community except
5 for those in the centrist know. And it's
6 completely inappropriate for what we're
7 dealing with in California where we're dealing
8 with a lot of other problems that have to do
9 with balancing scab treatments with these
10 treatments and completely unrealistic
11 suggestions about bloom thinning, which
12 doesn't apply California, etcetera.

13 So I just really can't go for this
14 very prescriptive language. And I would want
15 to hear from the NOP whether they really feel
16 guidance is necessary at all, because you do
17 cover this in your points within the upper
18 part of the motion, one, two, three and four.

19 MEMBER FELDMAN: Right.

20 MR. McEVOY: Well, this is a very
21 new proposal here. We haven't had time to sit
22 and analyze it. So if it passed, we'd have to

1 take a look at it and get back to you, because
2 there's a lot of information in here and a lot
3 of new concepts that we'd have to have
4 reviewed by staff, including legal staff.

5 CHAIRMAN STONE: I talked to
6 Brenda about this a little bit and the
7 certifiers can manage this. The committed
8 growers, they've got some source separation
9 for EU compliance that they're sort of working
10 through, which is brand new for them this year
11 I guess, as well last year. So it's doable.
12 It's burdensome, but you heard how committed
13 they are to their growers and they work to
14 great lengths. I should have said during the
15 other ingredients discussion how much work
16 John alluded to and how many countless hours
17 that the certifiers work to verify that
18 integrity of those products out there.

19 So this is doable on the ground.
20 There's the other marketing sort of structures
21 and that kind of thing, but this is something
22 that could provide a safety net for some

1 people, and I just want to give a shout out to
2 the certifiers that will bear the work load on
3 behalf of this, what we're working through.

4 MEMBER FELDMAN: Harold?

5 MEMBER AUSTIN: A couple different
6 things to point out, and I guess it will
7 provide somewhat of a safety net, although I
8 don't think much. A couple things. Bloom
9 thinning. You know, there are certain
10 varieties depending on how they're planted,
11 especially in apples, that actually get
12 blossom thin. So not every variety, every
13 block, every type of planting is going to get
14 a bloom thinner on it. Density is already --
15 you know, on the existing ranches that we're
16 talking about, it's already established. They
17 can't modify that. I mean it is what it is.

18 And the same thing would apply to
19 the genetic resistance and rootstock and
20 scion. I mean if this is a temporary order,
21 it's an order that is talking pretty much
22 about stuff that's already in existence.

1 To divert their crop, most of the
2 growers in Washington are involved in a food
3 safety program either SQF1000 or GlobalGAP
4 Tier 1 or Tier 2. If they're a GlobalGAP
5 certifier with a fruit cooperative, it means
6 that they then have their food safety
7 certificate as a part of that warehouse's
8 certificate. So if they have to convert their
9 fruit from organic over to conventional for
10 that crop year, they may have some problems
11 trying to move it, because a certificate -- if
12 you're a Tier 2 you're underneath the
13 warehouses and it's not a stand-alone
14 certificate for you as a grower. So that's
15 going to create an issue.

16 Processors wouldn't accept the
17 fruit as well under the climate that we're now
18 in where everybody is gearing up trying to
19 head towards what the FDA's Food Safety
20 Modernization Act is going to be. Washington
21 State, our growers have really gotten ahead of
22 this process and I don't know of very many

1 that are not certified either SQF1000 or
2 GlobalGAP Tier 1 or Tier 2 at this juncture.
3 So that creates an issue. It really does.

4 Smaller growers probably could
5 handle it a little bit more so I think if
6 their acreage was really small, but you know,
7 if you've got any kind of volume at all, it's
8 going to create some serious problems where
9 that fruit's going to end up. Most likely a
10 little bit of it gets sold. A lot of it's
11 going to end up going to the landfill. And if
12 you're that type of grower, a smaller grower,
13 you may not be able to afford that. I mean
14 that's your livelihood.

15 So, yes, I think there's some
16 things in here that could help. I think
17 there's some things that we're already doing
18 as organic growers, but I do think, as Zea
19 pointed out, some of this stuff isn't
20 practical in certain specific areas. But I do
21 think the bloom thinning, that's not going to
22 be, you know, a one-size-fits-all because not

1 everybody's bloom thinning because some are
2 doing it be hand. And we do have the fruit as
3 a concern, too, where it's going to end up at.

4 MEMBER FELDMAN: Thank you. Jean?

5 MEMBER RICHARDSON: I might
6 suggest that we might be able to amend the
7 motion as it is on the floor; and I'm the
8 seconder of the motion -- is that we simply
9 stop the recommendation at the end of the
10 first paragraph and that it simply goes on to
11 say, "The NOSB recommends that the NOP issue
12 guidance on alternative practices to implement
13 a systems-based approach that integrates
14 prevention, monitoring and control of fire
15 blight," and simply leave it at that and
16 eliminate the prescriptive detail which will
17 vary enormously as we understand in its
18 application in the different areas.

19 MEMBER FOSTER: If that were done,
20 does that change the uncertainty I thought I
21 heard in the Program's thinking about this?

22 MR. McEVOY: No, there's a lot of

1 things here that we have not run through any
2 kind of review process. So it could be fine,
3 but we haven't had a chance really to analyze
4 how this would fit into the existing emergency
5 pest provision under 672, what kind of
6 authority we have to do this. So there are a
7 number of questions here.

8 CHAIRMAN STONE: Yes, along those
9 lines I think this -- I know there's some
10 fancy footwork that the Program will have to
11 do to -- the existing regulation doesn't allow
12 for the rapid -- the growers have to have full
13 capability to make the decision-this-morning-
14 and-go-do-it-this-afternoon-sort of an
15 approach, not waiting on approvals from
16 government agencies, or certifiers for that
17 matter. So it has to be structured in a way
18 that's functional on the ground, or else it
19 looks like we did something but didn't really.

20 But I guess that also suggests
21 that -- this is a recommendation. The Program
22 a lot to ruminate on this one, and as Miles

1 said, get legal counsel involved in stuff. So
2 I don't know that we need to overly wordsmith
3 it because it is a recommendation and they'll
4 have to turn that back around, and we'll have
5 time to see this again before anything
6 happens.

7 MEMBER FELDMAN: Nick?

8 MEMBER MARAVELL: Yes, I'll ask
9 Miles and anybody else who might know, has
10 this section of the regulation ever been
11 invoked before?

12 MR. McEVOY: Repeat that, Nick,
13 yes.

14 MEMBER MARAVELL: Yes, I asked
15 anybody whether in the audience, at the table
16 or on the NOP staff, has this aspect -- maybe
17 not in just this way, but has this aspect of
18 the regulation ever been invoked before? It's
19 generally referred to as the Emergency Spray
20 Provision.

21 MR. McEVOY: Six-seventy-two, the
22 Emergency Spray? Yes, it's under

1 consideration currently with the citrus --
2 what's it called, Asian citrus --

3 MEMBER SONNABEND: Asian citrus
4 psyllid.

5 MR. McEVOY: Psyllid.

6 MEMBER SONNABEND: But that's a
7 true government-mandated --

8 MR. McEVOY: Right.

9 MEMBER SONNABEND: -- emergency
10 spray, not just organic.

11 MR. McEVOY: Right. So I don't
12 know if they've started the spraying, but
13 they're going to be spraying some organic
14 citrus orchards in California for the psyllid.

15 MEMBER MARAVELL: Well, I would
16 point out this is a very important distinction
17 that Zea has just mentioned, that this would
18 only apply to organic growers. The
19 conventional growers, this would be of no
20 value to anyway. And so that does put, you
21 know, a limitation on it which might make it
22 easier, might not.

1 MEMBER BONDERA: Yes, I just want
2 to say that I think given where we're at right
3 at this moment, from my perspective, I agree
4 that this isn't necessarily perfect. It was
5 put together very quickly. Like Harold was
6 saying, it's not going to work for everybody
7 and do everything, but it may help some and I
8 think it may be worth the time and energy and
9 effort that is put in. And I mean I can
10 understand from the programmatic perspective
11 the costs, but I just don't see the negative
12 aspect. So I would say my perspective is
13 let's try to move forward with some
14 potentially positive opportunity given the
15 circumstance where we're at right now.

16 MEMBER FELDMAN: Zea?

17 MEMBER SONNABEND: I too have some
18 concerns about whether it actually can be
19 implemented or not, but to address Harold's
20 concerns, it's better than we have now for
21 those people who can work it. And the people
22 who can't work with it because of GlobalGAP

1 and the like just have to make their choice
2 based on the other options. So, you know, I
3 don't think they have to send fruit to the
4 landfill, but they may have to pull out of
5 organics altogether or find an alternative way
6 to control fire blight. But to help those
7 people who we can help through this program if
8 it can be adopted seems worthwhile to try.

9 I would feel more comfortable if
10 it said in the part that the NOSB recommends
11 guidance -- I would feel more comfortable if
12 it said "the NOSB suggests that the NOP issue
13 guidance," so it's not part of a
14 recommendation, because I see that the very
15 complicated issue of guidance might distract
16 from getting a rulemaking done on this. So if
17 it's a suggestion, they can work through it
18 and not have to have the same weight as a
19 recommendation.

20 CHAIRMAN STONE: Jay, I'm going to
21 suggest that if a couple of you Crop Committee
22 maybe get together and decide on some

1 wordsmithing and where to draw the line here.
2 Basically we just lobbed an IED in the
3 Program's lap and they're trying to see just
4 how they can handle it and just what -- and
5 then they can better advise us.

6 So if we take a break for I'll say
7 15 minutes. After the break we'll finalize
8 this. We've got workplan and a little bit of
9 a wrap up. So I hope everyone will stay in
10 the audience because there's a few things yet
11 we'd like to convey to the audience. Thanks.

12 So I don't know what time it is.
13 Back at 4:45. So 12 minutes.

14 (Whereupon, at 4:31 p.m. off the
15 record until 4:43 p.m.)

16 CHAIRMAN STONE: Okay. We're
17 going go on back to work. We'll wrap up this
18 meeting.

19 So I think what we've decided; and
20 again with consultation from many of you in
21 the audience, this is an attempt, because of
22 the tough emotional decision that we made a

1 little bit ago and a safety net, if you will,
2 but this Board normally scrutinizes every
3 word, Nick, and we think we need to give this
4 more time to senesce into a document and a
5 process and a procedure. The Program has a
6 lot to consider at the -- just the inner
7 workings of this on our behalf. Consumers and
8 industry, everyone needs to have a look at
9 this. That's our normal open policy.

10 I don't like the precedent setting
11 of just throwing something together and people
12 haven't read it and fully digested it. But we
13 do want to get the word out to the growing
14 community, growers, that we're considerate of
15 their concerns and may be able to craft a
16 methodology that can provide some safety net
17 to some individuals.

18 So I think what we decided was
19 that we'll keep this basic motion, keep this
20 basic language as a recommendation and make a
21 motion to the Program to work with us in this
22 next term, put this subject on the workplan

1 for the Crops Committee for the summer term
2 and the Program will be working with us
3 obviously to see if we can implement something
4 like this, what would it look like and get
5 input and feedback from the related
6 shareholders. I like that word, Jay and
7 Harold.

8 So if you want to -- I'm not sure,
9 Jay, just how we want to take this intent and
10 make the motion is more about this
11 consideration.

12 Nick?

13 MEMBER MARAVELL: Yes, I
14 respectfully want to go on the record here
15 because "we" does not represent my opinion in
16 this particular case. And let me just say
17 what we're trying to do and why I feel that we
18 might be overplaying this a bit.

19 Under the statute, the Organic
20 Foods Production Act, it enumerates several
21 responsibilities that the Board has to carry
22 out. It says "the Board shall." And one of

1 those is we shall advise the Secretary
2 regarding emergency treatment programs. I
3 have no problem with vetting this and making
4 this a public discussion, but that's not the
5 Board's call. That's not our process. Our
6 process stops when we provide advice to the
7 Secretary. I can see that the Program may
8 want to get further input on this in terms of
9 advising the Secretary. The only thing that
10 we're doing is carrying out our mandated
11 responsibility under the statute.

12 So I don't really think that the
13 United States we can rework this until the
14 cows come home, but I don't think it makes any
15 difference. All we're doing is providing some
16 advice to the Secretary. That's all we're
17 doing. And we are mandated in law to provide
18 that advice when we find conditions that we
19 feel warrant the Secretary being advised of
20 that. And particularly to slow this down
21 within the NOSB with procedural activity in
22 the case of an emergency treatment program I

1 think is a bad precedent. I think we simply
2 tell the Secretary, hey, we got a problem
3 here, and then it's up to the Secretary to
4 evaluate that and take whatever process the
5 Secretary wants to do.

6 And I would also think that if
7 this is something that the Secretary wants to
8 evaluate, it would probably be better to have
9 a motion on the record rather than, well, you
10 know, they're sort of thinking about doing
11 this and we're not quite sure what they're
12 going to say. I mean we should just put it
13 out and say it. And if it turns out that
14 we're wrong and we should do something else,
15 we'll certainly take appropriate action at the
16 next meeting.

17 So that would be -- I know you're
18 not pleased with this, Miles, but that would
19 be -- yes, I understand this is not going to
20 make your life easy, but it's not making our
21 life easy. We're in a very tight spot here.
22 If there were a condition where we did need to

1 invoke this because something was happening
2 right now, I don't see how we could take the
3 attitude, well, let's wait until the next
4 meeting and put it out for public comment when
5 that's not what this is about. I don't feel
6 that was ever the intent of the statute.

7 So I can fully understand how I
8 may be wrong in this case. That doesn't upset
9 me at all to be wrong, but I would
10 respectfully want to be on the record as
11 saying I would not vote to table this motion.
12 I would send it forward. And if it turns out
13 that we are wrong, I don't think we've done a
14 lot of damage, but we may have done the right
15 thing.

16 CHAIRMAN STONE: Colehour?

17 MEMBER BONDERA: Yes, I would like
18 to -- and I know it's not the case, but I
19 would like to second Nick's motion, even
20 though he didn't make a motion. But I agree
21 with what -- I agree honestly and that's what
22 I was feeling during the break, too, is what

1 if this couldn't wait? What if this was right
2 this second? And using this process to block
3 I think is a very poor precedent. And I don't
4 know what the Program imagines or thinks, but
5 I think that that's not the appropriate
6 strategy for us to be carrying out our role
7 here. We are not implementing action. We are
8 advising, and our advice can't just be in an
9 emergency put it on the table. So that's my
10 -- I support what he said.

11 CHAIRMAN STONE: Zea?

12 MEMBER SONNABEND: Do you guys not
13 realize that tetracycline is still allowed
14 this bloom season and next year and it's not
15 until 2015 that this would have to kick into
16 effect if it passes? I mean we're not talking
17 about having an emergency right now. It's
18 still allowed for two more seasons.

19 CHAIRMAN STONE: Correct. How
20 many more times you want to have this
21 discussion?

22 MEMBER FELDMAN: Why don't we

1 withdraw our motion and convert this into a
2 motion that requests that the Program
3 investigate the ability of the Department to
4 adopt an emergency program that enables the
5 apple and pear producers with fire blight to
6 utilize tetracycline from October 21, 2014
7 through October 21, 2017?

8 MEMBER MARAVELL: Is that under
9 the Emergency Spray Provision?

10 MEMBER FELDMAN: Yes, I'm sorry,
11 under 7 U.S.C. 6518(k)(6) and Rule -- I don't
12 have it here, 205.672. Do we want to adopt
13 that as a motion? Does that work?

14 MR. McEVOY: Yes, that sounds
15 fine.

16 MEMBER FELDMAN: Anyone type it
17 out?

18 MEMBER RICHARDSON: Can you read
19 back that motion, Michelle?

20 CHAIRMAN STONE: Yes, somebody's
21 going to rewrite that and I think it needs to
22 -- so we can repeat it.

1 Nick, did you have a question?

2 MEMBER MARAVELL: No. Well, I'd
3 like to make a comment that, you know, part of
4 my concern here is specific to this instance,
5 but part of my concern here goes more
6 generally to the statutory authority of this
7 Board. So I think people should consider that
8 in terms of setting this as a precedent.

9 CHAIRMAN STONE: Okay. So
10 somebody's succinct-ifying that motion on
11 paper?

12 MEMBER FELDMAN: Yes, I'm writing
13 it out. Should we go on and come back?

14 CHAIRMAN STONE: You want to go on
15 and come back to that?

16 The last thing on our agenda is
17 work plans and other business. So if
18 Michelle's not having to work on that motion,
19 then we'll go ahead and pull up work plans.
20 We'll put Crops off until last, Jay, so you
21 all can work on that.

22 So the work plans, again for those

1 in the audience, when we're wrapping up
2 preparations for this meetings;
3 recommendations, proposals, et cetera, we also
4 look at work plan. The Subcommittees develop
5 those. We get petitions. We have sunset.
6 We're looking forward. We take input from
7 written comment and personal comments at the
8 meetings and develop these work plans, what's
9 priorities. We discuss that with the Program
10 because we have to be pragmatic in what we can
11 get done, not just what we want to get done.

12 So I guess if Committee chairs --
13 we're going to put Crops off until last. I'm
14 not sure just the order they're in. So if the
15 Committee chairs can sort of be a little bit
16 ready here, we'll work through these. And it
17 looks like Joe is up first with CACS.

18 MEMBER DICKSON: Thank you, Mac,
19 and pardon me while I open my work plan
20 document here. Oh, look, it's on the screen.

21 Our fall work plan for the
22 Compliance, Accreditation and Certification

1 Subcommittee are -- the main piece of it is
2 the follow-up on the fall 2009 NOSB
3 recommendation on retail certification. That
4 was a process sort of started by several
5 earlier boards and not quite completed. And
6 we're looking to sort of resolve a few very
7 important questions about how the various
8 exemptions apply to retailers and how they
9 don't, and retail organic certification and
10 some of that territory.

11 We have a discussion document
12 centered around how certifiers apply
13 205.206(e), that John Foster's leading the
14 work on. And we offer our services to the
15 Program should we be able to provide any
16 guidance or work around implementing the Sound
17 and Sensible Initiative and look forward to
18 more dialogue with the Program on that.

19 And then finally, as we learned
20 today we will also be potentially working on
21 a discussion document or a proposal around the
22 exclusion of water related to the percentage

1 of organic calculation and some of the
2 subtleties around nut milks and teas and
3 various high water content materials and how
4 their percentage is factored into organic
5 product calculations.

6 And that is our work plan as I
7 know it now.

8 CHAIRMAN STONE: Does anyone
9 that's not on the CACS have any questions or
10 comments about that work plan?

11 Okay. I don't have my binoculars
12 with me. That looks like Crops sunset and
13 petition, so we'll scroll on down. We'll come
14 back to Crops. GMO ad hoc, that would be Miss
15 Jennifer.

16 MEMBER TAYLOR: Yes, sir. I can't
17 read that, but is it the same as what we had
18 previously? Okay.

19 We are very excited about the
20 opportunity to use the transparency
21 communication docket system. And under that
22 system, when it's implemented, we will be able

1 to take information such as the seed purity
2 document and the excluded methods documents
3 and receive additional information from our
4 public community.

5 What we have on our work plan as
6 we move towards the fall meeting is to proceed
7 with information gathered from the public and
8 from this meeting and develop a proposal
9 perhaps looking at seed purity, or maybe we'll
10 study it for awhile; we're not quite sure in
11 that direction how we'll take that, as well as
12 the excluded methods document that we received
13 information on. We are hopeful that we will
14 also be able to take that information and
15 receive additional information maybe through
16 the docket system as well or other methods and
17 bring that to a possible proposal for the fall
18 meeting again.

19 Other topics that we will be
20 looking at are prevention strategy guidance
21 for excluded methods in crops and handling and
22 tracing GMO's input. Is that on there,

1 tracing GMO's input? I have that on my work
2 plan here. It is? Okay. And that's a
3 proposed discussion document also for the
4 fall.

5 I'm hopeful that we will be able
6 to look at farmer's choice. That's something
7 that I have been talking about and the
8 Committee talked a little bit about with Mac
9 as well, but have not presented that
10 information to the Subcommittee yet.

11 So that's our plan as we proceed
12 towards the fall.

13 CHAIRMAN STONE: All right. Thank
14 you, Jennifer.

15 Any questions or clarifications
16 from Board Members?

17 All right. Waldo, you're up with
18 handling.

19 MEMBER FOSTER: Gibberellic acid
20 could be on our list. The current status is
21 on hold at the moment. I believe we're
22 waiting for a response from the petitioner.

1 We have ammonium hydroxide; which Jean has
2 been working on, a petition to remove glycerin
3 from 605. We have a petition for PGME as a
4 boiler water additive. We'll also be working
5 on 2015 sunset items; four of them I believe,
6 gellan gum, marsala, sherry, tragacanth gum,
7 I believe. And we've assigned all -- I
8 believe a total of eight items we have leads
9 for.

10 Depending on how these go, we may
11 or may not have more room to work on
12 materials. We also will, I'm sure, continue
13 discussions, if nothing else, on ancillary
14 substances. I would imagine that we'll have
15 continuing dialogue on that, given the level
16 of interest I think the community has
17 expressed in that.

18 That's all I have at the moment.

19 CHAIRMAN STONE: Thanks. Any
20 questions or clarifications from other Board
21 Members?

22 Okay. Tracy will be swimming in

1 work this session. Livestock.

2 MR. FAVRE: As we're going to be
3 the all aquaculture all the time channel on
4 the Livestock Subcommittee, although we do
5 have one outlier with the methionine for the
6 organic poultry feed proposal we'll be
7 addressing, we've got one, two, three, four,
8 five, six, seven eight, nine, I believe,
9 aquaculture materials that have been proposed,
10 as well as the omnivore diet response, or the
11 next step for the discussion document which
12 I'm going to have some feedback for you here
13 in just a moment, as well as we have added to
14 our work plan the vaccines from excluded
15 methods from the GMO ad hoc committee.

16 Will you go ahead and pull that up
17 for me, please?

18 We do have a little bit of
19 feedback from specifically the methionine
20 issue in regards to the omnivore diet
21 discussion document that we put out for the
22 last meeting where we got absolutely

1 unequivocal feedback that the community did
2 not want meat scraps in poultry or pork diets.
3 So as we're moving forward with this we have
4 some summary statements here, and it's
5 basically that we are continuing to seek
6 feedback for input on ways to solve this
7 dilemma for omnivore diets, and are really
8 exploring all sorts of potential options, and
9 looking at promising alternatives, and looking
10 at the options for encouraging, and promoting
11 research into those areas. These are just
12 some of the summary statements that we put
13 together.

14 We did get some feedback on the
15 herbal methionine option that we were looking
16 at from a report back in December 2012 that
17 essentially that trial was ineffective. And
18 so there needs to be some more research done
19 into that to see if it truly is a viable
20 alternative or if we need to abandon that as
21 a potential option. And the Methionine Task
22 Force has just funded a major research study

1 to be conducted looking at the implementation
2 of the step-down proposal, and there's going
3 to be quite a lot of work put into that
4 between now and the fall meeting, and we're
5 looking forward to hearing from them on that.

6 So really the final thing we
7 really want to say is that we've got to find
8 a way to reduce synthetic from this industry.
9 Still struggling with issues. It's not
10 probably -- or maybe it is on the same order
11 of magnitude as we've gone through here with
12 oxytet, but it's a similar issue where there
13 is no good replacement yet. So we're
14 struggling with it. And we want to really
15 keep the stakeholders and the public abreast
16 of what we're doing.

17 At the same time we want to
18 emphasize even though the proposal for meat
19 scraps in the omnivore diet discussion
20 document was rejected pretty soundly, we still
21 want to make a statement as a board that we
22 want to encourage the natural foraging

1 behavior part of that discussion document.

2 And so we'll be providing some additional
3 feedback at the fall meeting.

4 And I think that wraps it up for
5 Livestock.

6 CHAIRMAN STONE: Thanks, Tracy.
7 Any further discussion, clarifications from
8 the Board?

9 Okay. Materials. Miss Zea, if
10 you're not working on that motion.

11 MEMBER SONNABEND: Thank you, Mac.
12 So our big work plan item for the next time is
13 to examine and update the petition on the
14 technical review process. The Department has
15 sent us a number of bullet points to work on
16 and I believe plans to send us some more. I
17 imagine we are going to fold into it the
18 process for limited scope TRs and in fact the
19 confidential business information portion as
20 part of that. And we may also undertake the
21 issue around convening of technical advisory
22 boards and/or a working group policy.

1 Also the definition of production
2 aids from this discussion document may
3 continue to be worked on. And then yearly we
4 will present our yearly list of research
5 priorities from all of the committees. So we
6 will be nagging or asking all of the
7 committees to assemble their research
8 priorities and give it to the Material
9 Subcommittee.

10 Our ongoing project is petition
11 and TR tracking. We don't have to do too much
12 these days because Lisa does such an admirable
13 job of sending a monthly update on where we
14 stand and we all look at it over. And then at
15 some future time we may undertake how to
16 address scientific uncertainty. Thank you.

17 CHAIRMAN STONE: Okay. Any
18 questions, clarifications? That reminded me
19 that we've a little conversation, Executive
20 Committee and individually, that one way that
21 maybe we can -- we talked about reducing the
22 number of people on each committee, depending

1 on the work load for that term. But we've
2 also talked about we may combine a committee
3 or two here, save some staff time with the
4 program so they can work on other ingredients
5 or some of these other items. So it may look
6 a little different when we come back when you
7 see recommendations in the fall, or it may
8 not. I'm not sure.

9 Okay. Policy. Colehour.

10 MEMBER BONDERA: Thank you. So
11 the Policy Development Subcommittee intends to
12 regroup around what happened with the material
13 initiation discussion document that we worked
14 through at this meeting. So that is still at
15 least tentatively ongoing.

16 I think our primary emphasis will
17 be on review and updates to the Policy and
18 Procedure Manual. At this point in time we
19 are essentially trying to redo the whole
20 thing, which is not something that's been
21 tried to be done in one fell swoop. So as
22 I've communicated to both the Subcommittee and

1 the Executive Subcommittee, it seems like we
2 may need to have that also be on at least the
3 spring '14 agenda.

4 And although they aren't on the
5 screen in front of you right now, I still have
6 on this list some things that are going to
7 have to get I think clarified. For example,
8 the program came out with a memorandum on the
9 subject of conflict of interest, however, the
10 NOSB in no format adopted or updated our
11 conflict of interest policy. So like was
12 stated in the last Executive Subcommittee
13 meeting before we came here, what we have to
14 work with is what exists right now in the
15 Policy/Procedure Manual. They have put forth
16 a memo, but that is not our adopted policy.
17 So my personal opinion is that will need to be
18 on an agenda.

19 And it's also not on this screen
20 right now, but we have talked about
21 decisive/indecisive determination of NOSB
22 votes. And the program has told us that they

1 would be providing a memo on that topic, but
2 we kept it on the work plan because we didn't
3 know what that would entail or when that would
4 happen. And so, my feeling as the Chair is
5 that that should still be on the work plan at
6 this time, unless we agreed to withdraw it.

7 So I think that that's all that I
8 -- yes, I think that covers what I wanted to
9 share. Thank you.

10 CHAIRMAN STONE: Thanks, Colehour.

11 Any questions, clarifications?

12 All right. I've asked John, the
13 Vice Chair of Crops, if he can run down the
14 crop list while Jay -- are you ready?

15 MEMBER FELDMAN: Yes.

16 CHAIRMAN STONE: Oh, okay. I
17 thought you were working on the motion still.
18 Sorry.

19 MEMBER FOSTER: And let me just
20 step away from being Vice Chair of Crops right
21 now.

22 CHAIRMAN STONE: Oh, yes, Nick,

1 who is Vice Chair?

2 MEMBER FELDMAN: I got it.

3 CHAIRMAN STONE: Okay.

4 MEMBER FELDMAN: Sorry. Okay.

5 For the fall meeting we have vinasse on the
6 agenda. This is a petition. We have a
7 petition that recently came in on
8 streptomycin. We have aquaculture. These are
9 used in aquatic plants, so carbon dioxide,
10 chlorine, micronutrients, lignin sulfonate and
11 vitamins B1, B12 and H. We have a petition on
12 magnesium oxide as well. And then we are
13 still working on the inerts, so the Inerts
14 Working Group is working away and we may have
15 some work to do, at least do an update.
16 Hopefully we'll have some good news to report.

17 And then one of the new issues
18 that we'd really like community input on is
19 contaminants in farm inputs. This started out
20 being called compost, but we've adopted a
21 broader construct of how we move forward on
22 this. So that is on the list as well.

1 And then we'll be starting to work
2 on issues that will not be on the fall '13
3 agenda, but spring '14. And these are
4 sunsets. Sulfurous acid, sodium carbonate,
5 peroxyhydrate and aqueous potassium silicate.
6 We'll start our TRs on that.

7 Then the other thing we haven't
8 really talked with the program yet is when we
9 should start or could start working on
10 guidance related to the bio-mulch, whatever.
11 We're calling it biodegradable mulch. So that
12 is something we may ask the program about
13 starting work on. I don't know what the time
14 table is for that.

15 Did I get everything?

16 CHAIRMAN STONE: That's enough.

17 MEMBER FELDMAN: Thank you. Yes,
18 and then we'll also be working on the
19 emergency provision for -

20 CHAIRMAN STONE: Okay. Questions
21 or clarifications on the work plan?

22 All right. Thank you very much.

1 So do you have a motion drafted
2 over there?

3 MEMBER SONNABEND: Here's the
4 motion while Jay's looking for it. Move to
5 request that the NOP investigate the ability
6 of the Secretary to invoke its authority under
7 the Emergency Spray Program's provision of the
8 Organic Foods Production Act, 7 U.S.C.
9 6518(k)(6) and Act 7 C.F.R. Section 205.672 to
10 allow the emergency use of oxytetracycline for
11 fire blight during the period of October 21st,
12 2014 to October 21st, 2017.

13 MEMBER FELDMAN: I guess we should
14 introduce this as a motion.

15 CHAIRMAN STONE: Yes, let's maybe
16 see if we're going to -- the language is going
17 to change any. Or we could get a motion and
18 a second on the floor.

19 MEMBER FELDMAN: Okay. I'll
20 introduce this as a motion. Can I get a
21 second?

22 MEMBER RICHARDSON: Second.

1 CHAIRMAN STONE: All right. Nick?

2 MEMBER MARAVELL: I have a point
3 of order. Was there a previous motion on the
4 table that was made?

5 MEMBER FELDMAN: I think the
6 record will reflect that it was withdrawn and
7 seconded. I think you --

8 MEMBER MARAVELL: It was
9 withdrawn? I wasn't aware of that.

10 CHAIRMAN STONE: It wasn't
11 withdrawn at the table, so we do need to
12 withdraw it at the microphone.

13 MEMBER MARAVELL: Right.
14 Because --

15 MEMBER FELDMAN: Oh, okay.

16 MEMBER MARAVELL: So if you want
17 to make a motion to withdraw it, I would
18 welcome the opportunity to vote against it and
19 then I can --

20 MEMBER FELDMAN: Okay.

21 MEMBER MARAVELL: Just do it in a
22 hurry.

1 MEMBER FELDMAN: I'll introduce a
2 motion to withdraw the original motion in
3 deference to the Department's need to
4 investigate this issue in good faith so that
5 we can move forward a program that addresses
6 emergency conditions for growers who are
7 experiencing fire blight. I need a second,
8 please.

9 MEMBER RICHARDSON: I second that.

10 CHAIRMAN STONE: Motion and a
11 second to withdraw the original emergency
12 spray plan. Anyone like to comment?

13 Seeing none, I guess we still have
14 to do this formally. So we'll proceed to the
15 vote, and John goes first.

16 MEMBER FELDMAN: We don't need to
17 do that. We withdrew the motion. You never
18 voted for it. We never got to a vote. We
19 were in discussion.

20 MEMBER MARAVELL: Excuse me?

21 MEMBER FELDMAN: We never voted on
22 the previous motion.

1 MEMBER MARAVELL: No, we didn't.

2 MEMBER FELDMAN: Right. We
3 withdrew it before you had a chance to vote.

4 MEMBER MARAVELL: I'm not trying
5 to vote on that. I'm trying to vote on the
6 motion to withdraw it.

7 CHAIRMAN STONE: I think we still
8 have to -- we have a motion and a second.

9 MEMBER FELDMAN: No, I think we
10 can just withdraw it.

11 MEMBER BONDERA: Nick, we have to
12 vote on withdrawing the motion, is that
13 correct?

14 MEMBER MARAVELL: I don't know if
15 we have to. I'd love to, but I don't know if
16 we have to. I mean I'm not a parliamentarian,
17 but normally when there's a motion on the
18 table you can't just -- you can make a motion
19 to table which then requires a vote. You can
20 make a motion to withdraw, or you can vote it
21 down. But I'm not a parliamentarian and I'm
22 not trying to give the Chairman a hard time.

1 I'd just like the opportunity to vote against
2 withdrawing it. That's all.

3 CHAIRMAN STONE: All right. So
4 let's go this way: All in favor, say aye?

5 Any opposed?

6 MEMBER MARAVELL: No.

7 CHAIRMAN STONE: Very good. Okay.
8 The ayes have it.

9 MEMBER FELDMAN: Thank you, Nick,
10 for getting that on the record. And I do
11 think you're raising an issue that we should
12 resolve. So are we back to the motion --

13 CHAIRMAN STONE: We're back to the
14 motion --

15 MEMBER FELDMAN: -- just to get
16 back on track here?

17 CHAIRMAN STONE: Right.

18 MEMBER FELDMAN: I introduced the
19 motion. Jean seconded the motion that was
20 read by Zea.

21 CHAIRMAN STONE: Can you blow that
22 up just a little, Michelle, please?

1 Can you all tell? Is that enough
2 to work with without being prescriptive?

3 MR. McEVOY: Yes, we can work with
4 that.

5 CHAIRMAN STONE: Any other Board
6 Members see -- not going to give you too long.
7 Okay. Kind of like the aye and no thing, but
8 -- so we'll proceed with the vote. And let's
9 finish this out formally and we may think
10 about this aye and nay thing, but -- so, John,
11 you get to start.

12 MEMBER FOSTER: Yes.

13 MEMBER WALKER: Yes.

14 MEMBER FULWIDER: Yes.

15 MEMBER AUSTIN: Yes.

16 MEMBER TAYLOR: Yes.

17 MEMBER MARAVELL: Is it my turn?

18 Yes? No.

19 MEMBER THICKE: Yes.

20 MEMBER BONDERA: Yes.

21 MEMBER FAVRE: Yes.

22 MEMBER BECK: Yes.

1 MEMBER SONNABEND: Yes.

2 MEMBER FELDMAN: Yes.

3 MEMBER RICHARDSON: Yes.

4 MEMBER DICKSON: Yes.

5 CHAIRMAN STONE: Chair votes yes.

6 So that's 1 no, 14 yes. Motion carries.

7 Thank you.

8 Miles, we appreciate you all's
9 interest in working with us to develop a
10 system if and in fact it can be workable, it
11 may not be helpful. We hope it might be or
12 provide some safety net.

13 Okay. Does anybody else that's on
14 the Board have any other business or something
15 to bring to the attention?

16 Well, I'll just like to -- oh, I'm
17 sorry, Miles. Go ahead.

18 MR. McEVOY: Yes, I just wanted to
19 let people know that the President released
20 the budget yesterday and in the budget for
21 USDA includes a \$2 million increase for the
22 National Organic Program for --

1 (Applause.)

2 MR. McEVOY: -- enforcement and
3 international trade arrangements. So a \$1.5
4 million increase for increased enforcement and
5 half a million dollars for working on
6 international trade arrangements. So that's
7 just one of a number of things that would need
8 to happen. Currently we're under about five
9 percent less money this year than we had last
10 year. And that's just some information for
11 you. There you go.

12 CHAIRMAN STONE: So even more work
13 for you. That's good.

14 I'd like to close out this meeting
15 with just a couple of thoughts. This Board
16 recognizes that nobody rotates off next year.
17 These 15 of us, we get to share the next year-
18 and-a-half, almost two years together. So I
19 look forward to us furthering the
20 relationship-building that this afternoon
21 really did. I think it brought us closer as
22 individuals. Having breakfast this morning

1 with people that were on each side of this
2 difficult issue and the share and the love
3 that they showed for each other was just
4 really rewarding.

5 But I also have to say to some of
6 those in the community that created an
7 environment of mistrust and often used twisted
8 or misleading language, it doesn't really pass
9 the sniff test of organic principles to a lot
10 of us that on this side of the microphone have
11 to really wrestle with these things. And a
12 strong consumer advocacy is very important to
13 this whole process, but it makes it harder to
14 do our job on this side of the table.

15 I want to recognize not just the
16 NOP staff that's here, but those of you all
17 back in D.C., and many of you work from around
18 the country, for all the work you do. And I'd
19 like for those of us on the Board and everyone
20 in the audience to give Michelle Arsenault a
21 big round applause for all that she does.

22 (Applause.)

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CHAIRMAN STONE: So last I'll just say, and I'll try to do it without crying, but I've never been more proud of a group of people than today. Thank you.

(Whereupon, the above-entitled matter went off the record at 5:23 p.m.)

| A | | | | |
|---------------------------|-----------------------------|---------------------------|----------------------------|---------------------------|
| abandon 375:20 | accept 107:21 | acknowledge 21:16 | 267:9 271:19 | adequate 158:11 |
| abbreviated 179:19 | 110:14 197:11 | 159:10 298:16 | 301:19 303:16 | 216:7 222:7 |
| abides 328:12 | 278:16 282:1 | 302:16 305:14 | 310:21 323:20 | 289:15 307:6 |
| ability 20:12 68:5 | 342:3 351:16 | acknowledged 26:3 | 326:13 | adequately 238:16 |
| 278:22 335:21 | acceptable 198:22 | 215:17 | added 10:16 24:6 | adhere 298:3 |
| 366:3 384:5 | 306:4 | acknowledging | 25:2 42:6,9 48:10 | adherence 61:2 |
| able 20:17 21:14 | acceptance 67:5 | 275:13,20 | 49:8 52:5,9,12 | Adjournment 4:17 |
| 32:15 49:2 79:2 | accepted 179:6 | acknowledgment | 61:17 65:13 74:2 | adjuster 9:12 |
| 87:7 97:14 107:18 | 268:4 | 232:16 | 152:11,18 155:5 | Administrator |
| 161:19 162:6 | accepting 155:15 | acquired 243:13 | 176:2,5,11 180:13 | 2:12 |
| 169:22 178:3 | access 29:12 32:6 | acre 334:14 | 221:9,11 222:6 | admirable 378:12 |
| 235:3 242:1,7 | 32:10 178:13 | acreage 289:13 | 374:13 | ado 7:13 |
| 256:17 275:7 | 289:15 291:22 | 306:14 352:6 | adding 51:12 | adopt 252:9 307:8 |
| 287:6 289:20 | accessible 183:2 | acres 306:13 | 128:22 155:7,10 | 366:4,12 |
| 301:13 309:3 | accommodate | acrimony 67:15 | 221:22 | adopted 102:13 |
| 313:3 334:9 | 25:20 | Act 28:12 59:16 | addition 8:10 11:19 | 206:15 271:16 |
| 346:16 352:13 | accommodated | 206:9 344:18 | 14:7 16:8 198:11 | 279:15 358:8 |
| 353:6 360:15 | 30:5 | 351:20 361:20 | 207:12 234:2 | 380:10,16 382:20 |
| 369:15 370:22 | accommodating | 384:8,9 | 276:10 341:3 | adopting 136:2,3 |
| 371:14 372:5 | 280:2 | action 76:15 | additional 10:8 | 310:4 347:20 |
| above-entitled | account 305:22 | 107:14 241:19 | 11:17 14:5 22:11 | adoption 25:5 |
| 106:9 269:13 | accountability | 242:13 363:15 | 29:6 50:12 62:12 | advance 8:20 12:8 |
| 393:5 | 294:15 | 365:7 | 80:5,7,10 89:19 | 14:18 16:18 |
| abreast 376:15 | Accreditation 3:16 | active 101:8 210:9 | 131:20 177:5 | advancing 270:4 |
| absence 76:14 | 3:20 368:22 | 210:10 239:14 | 187:14 189:14 | advantages 242:13 |
| absent 17:10,12 | accredited 346:3 | activity 229:14 | 212:7 213:18 | adverse 44:1 |
| 183:18 205:21 | accurate 138:19 | 362:21 | 215:20 229:22 | advice 65:16,20 |
| absolute 174:13 | 170:6 177:19 | actual 99:14 178:9 | 255:12 332:1 | 199:6 258:19 |
| absolutely 60:19 | 224:17 | 180:16 184:21 | 371:3,15 377:2 | 278:9 362:6,16,18 |
| 79:10 86:14 135:9 | accusations 84:12 | 208:7 | Additionally | 365:8 |
| 223:15 276:4 | accused 85:17 | ad 370:14 374:15 | 177:21 | advise 359:5 362:1 |
| 374:22 | achieve 20:18 | adapt 294:17 295:1 | additive 96:17 | advised 362:19 |
| Abstain 228:6 | 85:11 310:1 | adaptability | 176:4,6 227:11 | advises 345:16 |
| abstained 112:17 | acid 3:25 7:17 8:3,7 | 294:15 | 373:4 | 346:1 |
| 118:1 | 8:11 9:10,12 | add 12:15 14:21 | additives 90:3 | advising 362:9 |
| abstention 13:16 | 10:15 37:9,12,14 | 17:11 22:21 30:17 | 93:18 140:11 | 365:8 |
| 15:15 228:18 | 37:18 38:3,5,11 | 33:5 45:6 47:18 | 176:1 | advisory 2:14 93:2 |
| abuse 315:18,22 | 42:4,4,9,11,14 | 49:10 51:3 64:4 | address 10:9 77:3,4 | 377:21 |
| 317:16,17 | 43:10 44:4,16 | 88:19 90:8 110:15 | 152:20 164:5 | advocacy 315:14 |
| abused 317:22 | 107:1,14 108:1,17 | 126:20 127:18 | 233:12 239:3 | 392:12 |
| ACA 18:22 25:4 | 109:10 110:13,16 | 129:14 134:4 | 347:7 357:19 | advocate 295:15 |
| 170:15 | 246:11,18 248:1 | 152:2 155:4 | 378:16 | 298:12 311:7 |
| ACAs 19:20 20:20 | 372:19 383:4 | 163:19 172:22 | addressed 19:21 | 313:19 |
| 23:13 25:1,6,13 | acids 3:24 204:22 | 174:15,16 175:19 | 331:21 | advocates 341:4 |
| 32:15 | 218:6 220:19 | 185:3 219:5 | addresses 386:5 | advocating 315:22 |
| accent 101:20 | 221:7 222:21 | 222:12 237:15 | addressing 92:11 | affairs 98:8 |
| | 224:2 225:19 | 251:20 253:12 | 126:10 374:7 | affect 159:1 |

| | | | | |
|---------------------------|---------------------------|---------------------------|-----------------------------|----------------------------|
| affixes 174:3 | 166:18 171:16 | allowed 12:13 24:2 | 276:14 340:22 | and/or 287:6 |
| afford 352:13 | 173:13 182:13 | 38:6 54:6 75:19 | amending 132:20 | 377:22 |
| afternoon 18:8 | 257:3 321:14,15 | 104:18 141:5 | 133:19 134:14 | angst 293:4 |
| 40:6 124:16 125:5 | agriculture 1:2,3 | 142:1,2,18 164:7 | 271:17 | animal 6:18 44:15 |
| 391:20 | 53:1 97:18 193:8 | 165:5,5 195:9 | amendment 134:1 | 45:2 240:21 293:4 |
| ag 120:12 284:11 | 278:7 314:6 315:4 | 207:7,14 208:11 | 134:4,7,12 198:21 | 293:5,6 295:5 |
| age 96:2 | 315:22 320:20 | 208:19,21 212:11 | 342:4 | 297:2 315:4 |
| agencies 191:2 | 321:17 322:5,6 | 212:12 235:1 | amendments 92:22 | animals 297:2,6 |
| 354:16 | 325:16,17,21 | 237:17 238:11 | 133:19 134:9 | Ann 192:2 |
| agency 289:3 | 333:8 | 257:10,18,18 | 183:12 197:12 | annotated 22:5 |
| agenda 8:7 17:17 | Ah 124:14 | 258:2,6,9 260:2 | 251:16 253:11 | 261:19 305:20 |
| 21:14 37:3 38:3 | ahead 28:6 109:3 | 260:16,21 264:4 | 267:8,9,21 268:4 | annotation 22:6 |
| 38:12 124:11,22 | 121:21 125:10 | 271:21 284:6 | 344:5 | 26:7 33:6,11,15 |
| 169:10 191:15 | 189:11 218:7 | 297:3 365:13,18 | America 6:1 38:16 | 33:17,20 34:4,14 |
| 269:7 367:16 | 220:11 230:7 | allowing 60:12 | American 338:3,3 | 34:15 40:11 65:10 |
| 380:3,18 382:6 | 231:12 236:3,4 | 168:1 232:11 | amino 3:24 204:22 | 77:3 81:12 82:8 |
| 383:3 | 262:20 272:16 | allows 94:9 97:1 | 218:6 220:19 | 104:17,17 105:1,8 |
| agent 17:2 174:5 | 305:12 347:17 | 264:20 331:13 | 221:7 222:21 | 149:7 271:20 |
| 279:2 | 351:21 367:19 | alluded 349:16 | 224:2 225:19 | 288:1,6 290:10 |
| agents 176:2 279:6 | 374:16 390:17 | Allyson 3:12 69:2 | ammonium 373:1 | 310:5 |
| ago 18:6 37:11 | aid 143:10 182:4 | 87:21 88:2 91:19 | amnesia-kind | annotations 22:15 |
| 46:19 76:12 95:18 | 183:6 199:17 | 91:19 | 301:4 | 33:4 82:6 89:20 |
| 158:22 219:3 | 241:20 | all's 231:1 390:8 | amnesty 300:10,20 | 148:8,14,16,22 |
| 249:20 292:2 | aids 75:15 136:20 | almond 177:2,22 | amount 15:8 126:9 | 157:14 |
| 323:22 327:3,4 | 137:15 140:21,22 | alongside 178:4 | 307:6 | annual 248:16 |
| 336:15,15,16 | 143:4,11 182:1 | Alternaria 242:18 | AMS 1:3 | 272:6 |
| 360:1 | 378:2 | alternate 234:15 | Anaheim 95:17 | answer 13:7 43:22 |
| agonizing 327:9 | ailment 47:7 | alternating 234:15 | analysis 184:20 | 44:19 66:4 105:5 |
| agree 43:22 64:8 | air 316:10 | alternative 271:4 | analyze 348:22 | 126:22 146:6 |
| 84:14,14 134:1,13 | albeit 328:17 | 272:8 275:22 | 354:3 | 161:14 256:3 |
| 135:6 177:15 | algal 62:9 76:4 | 309:2,12 341:6 | analyzed 141:20 | 284:15,16 285:17 |
| 188:5 216:10 | alignment 187:10 | 346:22 353:12 | ancillary 18:10,11 | answered 44:13 |
| 253:1 308:2 | aligns 140:4 | 358:5 375:20 | 20:10 22:3 27:2 | answering 127:22 |
| 325:18 333:12 | alike 306:1 310:12 | alternatives 38:17 | 28:11 29:7 33:22 | answers 43:20 64:1 |
| 357:3 364:20,21 | Alliance 10:20 | 39:13 43:9 51:20 | 59:15 61:18 96:14 | 304:9 330:11 |
| agreed 381:6 | allow 19:19 42:10 | 90:22 91:3 113:10 | 102:6,18,21 103:4 | anti 16:9 |
| agreement 5:21 | 46:10 48:2,10 | 113:11 118:19 | 106:19 124:12 | antibiotic 85:7,21 |
| 134:5 182:10 | 74:5 101:6 105:10 | 234:5,21 288:21 | 137:11,14 141:9 | 194:16 239:6 |
| 187:7 318:2 | 108:12 162:10 | 289:7 307:9 331:2 | 142:12,21 143:2,9 | 240:17,20 241:8 |
| agrees 42:2,17 | 215:10 216:7 | 375:9 | 166:1 252:10 | 278:12 282:21 |
| agribusiness 69:16 | 238:13 260:1 | altogether 358:5 | 253:16 254:14 | 296:11,17 298:17 |
| agricultural 13:14 | 300:10 307:7 | Alvamaro 16:7 | 259:10 260:10,12 | 300:11 320:21 |
| 14:9 15:14 31:7 | 354:11 384:10 | amazing 323:6 | 260:16,20 261:17 | 321:19 322:8 |
| 85:22 90:1 112:12 | allowance 22:3 | ambient 240:5 | 373:13 | 325:18 347:11 |
| 116:8 120:5,12 | 194:5 | amend 93:13 353:6 | and-a-half 391:18 | antibiotics 70:5,21 |
| 138:16 146:15 | allowances 207:12 | amended 133:2,15 | and-go-do-it-this... | 71:4 72:11 85:14 |
| 147:5 164:20 | 208:6 | 219:7 251:13,18 | 354:14 | 87:3 193:3,6,13 |

| | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 193:17 194:3,6,11 194:13,20 195:12 279:17 296:9,21 297:1,12 308:12 314:22 320:19 322:4,11 324:6 325:15,20 326:6 341:19 anticipate 11:5 22:20 30:12 330:18 anticipated 25:5 antimicrobial 17:4 42:19 45:1 anti-caking 176:2 anxiety 269:21 anybody 7:4 82:19 99:16 150:7 197:21 297:16 335:4 355:9,15 390:13 anybody's 276:5 anymore 127:1 278:3 anyway 18:4,18 130:11 233:22 238:4 256:20 280:19 356:20 apologize 235:15 319:18 338:14 apparently 61:15 appear 8:13 11:22 14:10 59:20 207:9 212:1 328:22 appears 44:3 46:21 51:4 74:6,13 232:7 256:4,5 261:11 294:9 appease 276:1 appendices 132:8 249:9,12 appendix 27:13 129:10 130:5 applause 196:18 197:3 204:9 391:1 392:21,22 apple 57:21 70:19 | 72:11 87:2 99:19 193:18,20 194:2 194:10,15,18 285:9 291:1 306:9 321:21 338:19 366:5 apples 57:7,9 193:4 193:12,16 194:6,7 194:21 195:13 272:1 279:19 283:18 296:13 309:14 320:12 322:4 334:14 344:3,11 345:19 350:11 applicable 156:11 application 81:1 100:12 249:7,9,14 322:3 345:5 353:18 applications 291:6 291:7 347:11 applied 242:14 279:4 344:21 345:9 applies 117:21 apply 242:6,7 348:12 350:18 356:18 369:8,12 appointed 5:9 295:12,14 308:4 appreciate 50:6 59:5 98:13 101:12 158:2,5 159:12 186:15 217:19 262:6 269:17,18 291:17 390:8 approach 96:3 166:7 187:13 205:18 241:21 242:6 244:12 281:17,18 282:12 302:4 311:4,5,7,9 347:4 353:13 354:15 approached 323:8 approaches 167:2 | 283:9 appropriate 119:4 132:19 182:11 190:12,18 234:18 241:9 308:7 310:15 343:19 363:15 365:5 appropriateness 113:9 approval 118:4 181:7 203:2 approvals 354:15 approve 94:14 133:21 183:12 247:20 251:17 approved 97:10 105:9 183:16 228:18 252:7 apricots 95:6 APRIL 1:9 aquaculture 374:3 374:9 382:8 aquatic 44:4 382:9 aqueous 383:5 ARA 157:19 arbitrary 306:21 area 158:4 165:22 217:5 263:6 284:22 areas 214:6 285:1 352:20 353:18 375:11 arenas 316:7 arginine 222:22 224:2 225:20 argue 241:5 317:20 323:2 arguing 264:18 arguments 306:6 306:18 328:19 arrangements 391:3,6 Arsenault 2:14 205:2 342:8 392:20 articulate 295:13 Asian 356:2,3 | Aside 113:7 asked 18:5 66:17 79:9 220:9 221:2 266:11 355:14 381:12 asking 34:15 37:2 37:21 40:9 48:2 66:4,11 70:5 149:13 171:3 212:10 276:20 378:6 aspect 355:16,17 357:12 aspects 54:17 168:12,17 assemble 378:7 assess 90:20 155:20 216:11 assessment 91:10 assigned 373:7 assistance 170:1 assisting 206:4 associated 21:3 73:5 142:6 Association 19:3 88:8 assume 36:18 153:16 220:17 249:22 320:19 assumed 182:14 189:18 assuming 276:17 assumption 44:20 259:10 assurance 158:11 assure 118:12 ate 195:21 attempt 64:4 288:11 305:18 359:21 attempted 277:11 attempting 64:5 67:8 attention 67:8 390:15 attest 99:17 attitude 20:4 | 288:10 364:3 attributes 236:11 audible 202:4 219:22 222:19 224:12 226:9 227:19 236:15 244:19 265:7 274:1 292:4 339:1 audience 106:7 191:1 258:11 269:8,18 333:21 355:15 359:10,11 359:21 368:1 392:20 Aurelie 192:1 AUSTIN 1:17 40:1 40:8 83:4,6 108:3 110:5 111:16 114:4 115:15 116:21 121:6 122:3,12 123:17 130:15 200:16 202:9 225:8 227:4 228:13 229:6 230:12,17,19 231:3 233:10 234:1 235:12,19 236:2,10,13,16 237:8,14,21 239:1 240:16 241:4,10 244:10,20 245:11 247:13 248:4 250:13 268:2,15 270:21 272:16,20 273:19 274:2,4 276:7,22 280:15 287:14 292:5,10 297:16,19 333:19 339:2,16 343:6 350:5 389:15 authorities 39:5 authority 65:15 153:8 158:9 344:20 354:6 367:6 384:6 authorizing 345:20 automatically |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------|---------------------------|---------------------------|----------------------------|----------------------------|
| 262:18 | 164:2 165:1 | ban 326:6 | 335:12 | 222:5 242:16 |
| auxiliary 7:19 | 170:11 174:17 | banana 37:19 38:8 | bassiana 284:5 | 248:13 249:3,4,10 |
| 17:18 256:1 | 175:19 186:19 | 38:15 39:10 40:16 | bear 61:12 63:11 | 253:2 265:18 |
| availability 13:5,6 | 188:15 191:17 | 290:9 | 163:1 350:2 | 295:21 318:21 |
| 31:10,16 113:9 | 198:14 200:19 | bananas 37:4,10,15 | beat 67:1 | 319:3,13,20,21 |
| 306:19 | 203:10 204:4,15 | 39:14 | beating 317:16 | 325:14 331:20 |
| available 12:7,21 | 205:7 216:17 | banned 194:17 | Beauveria 284:5 | 344:15 372:21 |
| 14:17 43:12 99:22 | 219:16 232:20,20 | barista 325:8 | BECK 1:18 109:15 | 373:5,7,8 374:8 |
| 146:20 183:10 | 249:6,14 251:10 | barley 7:18 11:10 | 111:22 114:10 | 377:16 |
| 189:6 217:10 | 251:22 262:1,21 | 11:14,19,21 12:19 | 115:21 117:5 | believed 278:6 |
| 219:5 249:13 | 266:14 269:11,17 | 14:21 51:3,4,12 | 121:12 122:18 | 299:21 |
| 291:22 | 273:14 274:14,15 | 52:1 53:1,2,7,11 | 124:1 202:15 | believes 193:12,12 |
| Avenue 1:13 | 274:15 284:20 | 53:15,19 54:2 | 225:1 226:18 | belongs 46:15 |
| avoid 52:21,21 70:1 | 288:13,15 290:12 | 55:1,22 70:7 | 228:5 236:22 | Bend 98:9 |
| 234:17 258:12 | 290:14 291:13 | 73:14,17 74:7 | 245:3 247:5 | beneficial 239:18 |
| 293:11 | 297:21 298:14 | 112:8,11,15 | 250:19 268:21 | 240:11 |
| aware 22:13 27:9 | 306:13 310:14 | 114:15 115:7 | 305:7 339:22 | beneficials 229:15 |
| 29:7,18 58:11 | 318:19 349:1 | 117:20 | 343:12 389:22 | benefit 84:15 99:15 |
| 195:22 213:2,22 | 355:4 359:13,17 | Barry 195:2 | beef 17:4,5 | 101:7 234:20 |
| 243:7 385:9 | 366:19 367:13,15 | base 86:10,16 | beekeepers 47:1,9 | 298:7 314:18 |
| awe 327:11 | 370:14 375:16 | 137:7,8 229:12 | beep 36:8 | benefits 99:17 |
| awesome 68:11 | 379:6 388:12,13 | based 19:12 55:18 | beet 7:18 13:21 | 101:3 333:4 |
| 265:11 | 388:16 392:17 | 60:15 98:22 99:9 | 14:2,7,9 46:1,11 | benign 234:16 |
| awhile 133:5 | backed 71:11 | 100:1 124:20 | 46:14 47:18,20 | Bennett 192:3 |
| 371:10 | background | 174:14 177:12 | 48:3,12 70:6 | bent 194:8 |
| awkward 258:14 | 135:12 206:8 | 181:21 184:15 | 116:5,7 117:12,13 | benzoate 60:8,9 |
| aye 388:4 389:7,10 | 317:15 | 210:17 212:22 | 118:16 | 61:7 |
| eyes 388:8 | backs 290:4 337:16 | 218:22 271:1 | beets 15:7 48:8,15 | Berry 6:2 |
| Aykan 3:12 87:22 | bacteria 42:21 | 295:15 304:13 | 119:3 | best 20:12 23:9 |
| 91:22 92:2,3 | 53:17 56:2 240:7 | 305:5 306:19 | began 46:19 | 28:21 36:11 77:22 |
| 94:19 | bacterial 322:7 | 330:16 335:13 | beginning 57:3 | 120:3,7,13 314:7 |
| A-F-T-E-R-N-O-... | bad 106:4 300:1 | 346:7 358:2 | 127:1 215:6 | 334:3 |
| 204:1 | 363:1 | baseline 23:17,20 | begins 121:1 | bet 37:2 |
| a.m 1:12 5:2 | BAILEY 2:16 | 23:21 141:15 | 123:14 202:7 | beta 7:18 11:10,14 |
| 106:10,11 203:13 | bakery 187:21 | 142:2,13,17 | 224:13 250:4 | 11:19,21 14:21 |
| | baking 51:21 | 150:15 263:9,12 | behalf 266:22 | 51:3,4,12 52:1 |
| | balance 12:17 | 263:17,19 | 338:18,18,20 | 53:1,11,16,19 |
| | 20:15 229:1 | basic 84:2 360:19 | 350:3 360:7 | 54:2,22,22 55:22 |
| | 271:13 280:6,9 | 360:20 | behavior 377:1 | 70:7 73:14,17 |
| | 287:17 299:14 | basically 23:22 | behest 66:9 | 74:7 112:8,11,15 |
| | 314:15 337:15,16 | 54:20 58:2 67:16 | believe 35:12 42:13 | 114:16 115:7 |
| | balanced 221:6 | 171:4 187:7 | 44:8 60:5 62:6,6 | 117:20 |
| | 271:15 | 276:19 277:5 | 64:5 66:6 74:19 | betrayed 71:5 |
| | balances 19:18 | 359:2 375:5 | 79:4 106:16 | better 7:1 68:5 |
| | 280:8 326:2,9 | basing 85:18 86:1 | 138:12 191:17,18 | 157:11 208:21 |
| | balancing 348:9 | basis 168:1 172:21 | 195:10 197:6 | 235:4 238:18,19 |
| | ball 331:8 | 211:13 231:11,12 | 198:10 203:7 | 238:19,22 258:20 |

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 308:5 326:21 357:20 359:5 363:8 beverage 51:8 beyond 10:19 107:11 170:15 180:3 308:13 318:6 333:5 bicarbonate 51:21 bidding 103:7 big 22:18 285:8 289:8 324:7 377:12 392:21 billion 69:22 87:13 binoculars 370:11 biodegradable 383:11 biological 279:2,6 biologically 206:18 Biopesticides 206:5 bio-mulch 383:10 bit 18:5 33:5 83:7 129:5 157:8 168:5 219:8 224:15 225:14 229:8 238:18,22 241:18 271:4,6,14 273:1 277:8 331:9 333:9 338:13 341:16 349:6 352:5,10 359:8 360:1 361:18 368:15 372:8 374:18 bites 304:6 black 131:4 281:18 304:7 325:2 blanche 334:13 bleaching 17:2 blends 133:4 blessing 303:19 blight 195:13 235:7 242:21 272:1,5,9 278:12 298:21 321:9 322:9 325:6 341:8 344:3,10 345:18 347:6,9 353:15 358:6 | 366:5 384:11 386:7 blindness 222:15 block 350:13 365:2 blocks 325:5 blood 336:17 bloom 348:11 350:8,14 352:21 353:1 365:14 blossom 350:12 blow 388:21 board 1:6,12 2:14 23:8 50:4 54:11 59:11 63:2,6,13 63:16 64:16,21 65:17,22 66:7 67:6,22 72:18 74:20 75:2,7,11 75:12 76:5,15 77:6,12,19 78:5,7 81:5,18 82:10 90:2 91:1,5,13 92:11 94:14 98:15 104:7 106:7 126:4 127:20 130:13 136:10 140:13 141:9 149:14 158:8,10 159:7,10 160:9 165:14,16 166:6 167:2,16 183:22 187:1 190:21 202:3 205:14,17 209:11 209:16 211:6,19 212:15,22 213:14 213:14 214:8 215:7,9,17 216:10 217:13 219:17,21 230:13 249:4 255:5 258:20 266:19 273:4,22 276:2,3 281:1 287:16,20 290:3,7 298:1,1 301:2 303:20 307:21 308:4 311:17 313:16,17 322:18 | 323:7 325:1,7 326:1 329:5 334:1 337:20 341:2,3,17 360:2 361:21,22 367:7 372:16 373:20 376:21 377:8 389:5 390:14 391:15 392:19 boards 126:17 128:1 130:3,22 298:8 303:22 312:8 369:5 377:22 board's 63:14 73:7 93:1 104:4 106:12 195:11 211:9,16 298:4 331:6 362:5 bodies 6:14,15 50:18 body 338:11 bogged 97:9 boil 131:15 boiler 373:4 BONDERA 1:18 110:9 111:20 114:8 115:19 116:9 117:3 119:8 121:10 122:16 123:21 154:16 163:11 202:13 224:21 226:3,16 228:3 236:20 237:19 245:15 246:20 247:17 250:17 257:13 258:5 260:22 268:19 280:17 301:16 339:20 341:10 342:6 343:10 357:1 364:17 379:10 387:11 389:20 book 127:5,14 129:18 born 312:15 bothers 85:15 | bottle 196:16 bottom 127:14 302:8 bought 319:2 bounce 232:19,20 box 243:10 boxes 57:10 boy 133:4 257:1 brand 25:16 157:20 349:10 break 7:9 150:4 191:17 269:11 270:7 359:6,7 364:22 breakdown 44:3,15 45:3 breakfast 391:22 breed 221:13 breeder 220:3 breeds 222:17 Brenda 349:6 bridge 326:9 brief 38:14 57:21 98:19 203:6 205:14 206:8 briefly 77:18 209:9 215:2 brighter 36:21 Brine 17:5 Brines 2:18 3:22 8:4,6 11:11,13 13:22 14:1 15:21 16:1 205:9,13 217:12,16 218:14 256:6 bring 62:19 67:8 75:20 218:11 254:19 271:13 277:1 287:10 371:17 390:15 bringing 76:3,9 218:19 314:10,19 brings 96:6,13 broad 25:18 81:6 162:9 229:12 231:20 239:3,12 256:3 322:10 | broader 28:4 303:10 321:21 382:21 broadly 179:6 broad-spectrum 239:16 bromide 53:4 brought 5:7 22:16 56:15 291:3 336:14 391:21 Brown 192:2 206:2 brownie 223:3 bucket 329:4 budget 317:21 390:20,20 budgetary 20:16 bugle 204:5 build 240:13,14 291:13 built 238:13 314:2 bullet 142:14,22 143:1 152:10 377:15 bullets 159:13 bumps 278:13 bunch 18:19 327:10 burden 19:19 75:2 188:7 332:15 burdens 187:14 burdensome 349:12 business 4:14 9:16 26:10 43:6 89:13 192:17 323:17 367:17 377:19 390:14 businesses 187:15 260:20 336:22 busy 195:17,17 butter 318:21,22 butts 337:1 butyric 248:1 buy 49:16 51:9 52:15,20 61:6 62:8 70:16 188:11 292:22 323:14 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------|----------------------------|----------------------------|---------------------------|--------------------------|
| buyer 177:18 | called 8:9 27:7 | carry 9:4 135:2,4,7 | cell 233:19 | 78:12 79:4 104:1 |
| buyers 324:1 | 80:12 127:15 | 204:12 302:5,7 | Cellulose 100:3 | 118:15 152:3 |
| buying 62:9 71:6 | 143:2 150:12,13 | 303:4 361:21 | centered 369:12 | 157:16 165:18,19 |
| 79:22 155:22 | 189:1 221:6,15 | carrying 28:1 | centrist 305:20 | 170:2,7 176:21 |
| 316:4 | 232:6 241:7 255:5 | 270:15 302:9,9 | 310:4 347:3 348:5 | 178:15,19 181:3 |
| byproduct 15:1 | 255:6 262:16 | 362:10 365:6 | certain 49:2 63:8 | 182:15 184:17 |
| byproducts 120:6 | 356:2 382:20 | carte 334:13 | 80:4 176:22 | 201:16 260:19 |
| 120:12 | calling 80:11 | CAS 168:2 227:10 | 277:18 286:2 | 326:4 349:7,17 |
| B1 382:11 | 142:20 280:11 | 246:11,18 248:1 | 287:7 301:11 | 350:2 354:16 |
| B12 382:11 | 310:19 383:11 | cascading 329:14 | 309:14 316:20 | 369:12 |
| | calls 329:6 | case 10:17 18:12 | 332:15 350:9 | certifying 174:5 |
| C | Calvin 1:24 122:9 | 55:4,4,5,15 56:4 | 352:20 | 175:4 176:13 |
| CACC 169:9 | 224:16 299:9 | 71:4,14 72:6 | certainly 63:19 | 191:2 |
| CACS 7:9 169:6,9 | Canadian 321:20 | 73:14,21 74:1,6 | 71:2 74:3 151:8 | cetera 127:21,22 |
| 175:10 176:18 | canary 50:17 57:16 | 75:15 79:3 99:1 | 162:6 201:14 | 168:20 316:10 |
| 368:17 370:9 | 58:8 | 100:20 156:11 | 363:15 | 368:3 |
| Cal 92:7 | candor 323:5 | 189:15 279:1 | certificate 181:1 | CFR 98:20 344:20 |
| calculate 183:3 | canine 219:15 | 282:16 284:21 | 182:18 351:7,8,11 | chain 15:8 289:19 |
| 186:17 190:18 | cant 310:13 | 285:15 302:14 | 351:14 | 323:20 |
| calculated 170:8 | capabilities 266:15 | 316:6 318:21 | certification 3:16 | chair 110:11 |
| 171:21 180:20 | capability 354:13 | 326:5 361:16 | 3:20 119:18 175:6 | 114:12 125:21 |
| 182:8,9 199:14,15 | capricious 304:17 | 362:22 364:8,18 | 184:21 345:3 | 154:15 195:4 |
| calculating 169:11 | capture 264:15 | cases 100:1 155:9 | 346:18 368:22 | 227:6 228:16 |
| 171:12 186:11 | captured 262:17 | 261:21 304:5 | 369:3,9 | 245:16 250:20 |
| 198:3 | carbon 53:10 382:9 | cat 219:6 | certified 48:20 | 262:12 265:17 |
| calculation 172:21 | carbonate 383:4 | categorical 22:18 | 49:12 60:16 89:1 | 272:21 339:2 |
| 174:12 175:11,16 | carcasses 17:4 | categories 81:19 | 104:5 108:21 | 343:18 381:4,13 |
| 177:16,17 183:7 | carcinogen 42:5 | 129:6 167:1,17,18 | 144:6,15,17 145:1 | 381:20 382:1 |
| 184:4 185:1,3,15 | care 68:3 69:19 | 196:11 263:13 | 145:17,19 146:8 | 390:5 |
| 186:12 201:14 | 315:3 329:1,2 | 347:1 | 146:16 147:4,6,17 | Chairman 5:3,19 |
| 370:1 | career 310:11 | category 21:2 | 147:19 152:12 | 7:3 35:14 36:16 |
| calculations 176:17 | careful 129:22 | 161:20 180:19 | 153:1,3,9,11 | 36:20 39:19 41:3 |
| 177:11,13,18,22 | 286:9 287:8 | 184:11,13 | 154:18 155:1,21 | 41:11,14,17 45:10 |
| 179:13 187:9 | carefully 51:19 | cats 219:14 | 156:1,5,18 174:6 | 50:3 54:10 59:6 |
| 201:17 370:5 | 80:1 279:3 286:4 | Caughlan 3:11 | 176:5 285:9 | 62:15 64:9 68:17 |
| California 54:1 | 326:1 | 50:8 59:7,9,10 | 300:13 344:21 | 68:21 69:1 72:17 |
| 95:6,17 194:19 | Cargill 11:15 51:13 | 62:22 64:13 65:6 | 345:2,19 346:2,14 | 77:9 83:2 87:20 |
| 324:1 348:7,12 | 53:14,18,19 74:6 | 65:12 66:3 68:20 | 352:1 | 91:18,22 94:17,20 |
| 356:14 | Carmela 1:18 | 196:13 | certifier 78:13,22 | 98:2 101:9 103:11 |
| call 3:3 5:3 30:14 | 247:4 | cause 332:2 | 108:11 147:9 | 103:17 105:21 |
| 95:7 151:17 | Carmella 109:14 | caused 233:20 | 148:8 149:1,8 | 106:12,18 108:15 |
| 191:20 198:9 | carnitine 221:10 | 319:19 | 174:11 180:1,4 | 109:13 110:11,22 |
| 204:3,5,6 260:11 | Carol 192:2 | CBB 284:1,6,21 | 297:14 346:3,19 | 111:7 112:1,4 |
| 269:16 273:7 | carriers 261:19 | CBI 26:12 27:4 | 347:11 351:5 | 113:18 114:12 |
| 303:5 318:17 | carries 135:17 | 32:6 | certifiers 18:22 | 115:3,8 116:2,10 |
| 330:19 342:22 | 150:16 266:22 | CCOF 170:15 | 19:1,16 74:3 | 116:15 117:9 |
| 362:5 | 390:6 | Celestial 88:3 95:2 | 75:16 76:8 78:8 | 121:1,17 122:8 |

| | | | | |
|-------------------|---------------------------|---------------------------|----------------------------|-----------------------------|
| 123:2,14 124:8 | 377:6 378:17 | 251:18 265:6 | 382:10 | 181:11 260:15 |
| 125:9,21 128:16 | 381:10,16,22 | 321:13,15 | chocolate 179:21 | clarify 25:2 28:15 |
| 130:14 131:22 | 382:3 383:16,20 | changing 26:17 | 180:14 188:18 | 33:4 80:4 102:10 |
| 132:10 133:18 | 384:15 385:1,10 | 42:12 | choice 196:15 | 110:22 133:12 |
| 136:9 138:10 | 386:10 387:7,22 | channel 145:19,20 | 235:5 358:1 372:6 | 134:19 140:7 |
| 141:11,17 142:4 | 388:3,7,13,17,21 | 282:13 374:3 | choices 235:10 | 165:10 186:10 |
| 143:14 144:2 | 389:5 390:5 | Chapman 92:7,9 | 330:4 | 196:9 266:21 |
| 150:2,6 151:4 | 391:12 393:1 | characteristic | choose 233:6 | clarifying 11:4,7 |
| 152:2,17 153:4 | Chairperson 1:14 | 160:21 | 302:14 | 13:18 15:16 17:13 |
| 154:3,10 155:12 | 1:16 3:6,19 | characteristics | choosers 67:17 | 28:3 33:1 34:6 |
| 156:13 157:12 | chairs 66:20 | 142:16 160:14,16 | choosing 256:7 | 157:14 183:21 |
| 159:12 160:11 | 368:12,15 | 161:5,6,17 162:16 | Chris 206:4 | 189:12 |
| 161:9,15 162:5,17 | challenge 40:13,15 | 163:15 | circulated 169:19 | clarity 163:19 |
| 163:9,22 164:15 | 84:20 288:5 | characterize 143:1 | 174:21 183:14 | 223:18 231:18 |
| 168:4,22 186:9 | challenges 22:14 | Charlotte 3:10,11 | 340:22 | 251:12 257:7 |
| 191:9 196:6,19 | 89:16 290:4 | 45:15 50:7,10 | circumstance | 259:22 260:9 |
| 197:4 202:7 203:1 | chance 98:17 | 59:8 69:2,5 72:18 | 357:15 | 262:21 |
| 204:3,8,10 205:4 | 158:15 332:16,16 | 72:21 77:10 83:4 | citation 207:16 | class 46:16 47:11 |
| 216:21 217:8,15 | 332:17 354:3 | 87:21 104:1 | cite 128:14 | 92:9 261:19,20 |
| 217:18 218:10,21 | 387:3 | Charlotte's 104:16 | citing 140:2 208:15 | 311:17 322:10 |
| 220:5,22 222:8 | chances 279:12 | 105:4 | citizen 42:1 45:19 | classes 81:6,14 |
| 223:6,17,20 224:7 | change 10:11 23:16 | charts 311:21 | 51:1 52:18 192:19 | 129:19 |
| 224:13 225:10 | 24:4 27:1 34:8,14 | check 168:5 217:22 | 193:1 | classic 42:11 |
| 226:12 227:6,13 | 34:15 35:10 42:12 | checklist 20:21 | citric 10:15 42:11 | classical 158:19 |
| 227:22 228:16 | 70:16 79:2 128:7 | 21:7,10,13 32:14 | citrus 95:12 356:1 | classification 13:13 |
| 230:18,20 235:14 | 133:10 150:19 | 214:17 | 356:2,3,14 | 24:15,18 109:10 |
| 236:7,11,18 | 161:12,16 171:9,9 | chemical 42:20 | civility 327:12 | 113:17 116:6,12 |
| 237:12 244:22 | 172:4 176:14 | 43:18 50:10,12,13 | claim 20:3 51:7,10 | 121:22 122:5 |
| 245:16,20 246:4 | 186:10,12 198:8 | 95:9 97:19 158:18 | 58:12 181:5 | 208:3 223:7,13 |
| 247:3,19 248:8 | 253:1,15 254:17 | 289:9 313:3 | 185:16,17 198:18 | 224:1 230:16 |
| 250:4,20 251:5 | 255:10,12,16 | chemically 206:17 | 222:5,10 | 236:8,14 246:15 |
| 252:15,19 254:20 | 259:3,6 265:3 | chemicals 50:15 | claims 49:3 180:2 | 246:22 |
| 255:3,8 258:10,22 | 273:15 315:17,19 | 58:1 318:11 | 220:15 | classified 17:9 42:5 |
| 262:4 264:11 | 316:9 321:10 | chicken 177:2 | clarification 21:21 | 180:22 206:11 |
| 265:14,18 266:10 | 345:14 353:20 | 293:1 | 24:4 29:4,15 35:2 | 207:5 231:6 239:6 |
| 267:5,11,15,19 | 384:17 | child 43:16 | 35:4,6 107:11 | classify 15:13 |
| 268:3 269:1,6,16 | changed 25:19 | children 50:19 | 135:1 150:11 | 107:22 112:11 |
| 272:11,22 274:11 | 50:10 57:22 88:18 | 296:13 311:10 | 177:8,9 262:1,11 | 116:7 122:1 224:1 |
| 292:16 297:18 | 255:8 341:15 | chips 179:21 | 276:9 | 230:3 235:21 |
| 339:4,12 340:3 | changes 19:7 27:20 | 180:14 188:18 | clarifications | 246:17 |
| 341:12 342:18 | 33:6,11,15,17,20 | chitin 232:15 | 126:14 136:10 | classifying 107:22 |
| 343:16 349:5 | 34:4 91:12 102:8 | 233:13,16,18 | 219:18 372:15 | clause 26:2 31:16 |
| 354:8 358:20 | 107:8 133:9 | chitin-inhibiting | 373:20 377:7 | 198:1 200:5 |
| 359:16 364:16 | 161:10 169:15 | 231:22 | 378:18 381:11 | 261:12,16 263:11 |
| 365:11,19 366:20 | 170:11 171:3 | chloride 175:12,12 | 383:21 | clean 69:20 |
| 367:9,14 370:8 | 173:14 175:18 | 175:14 | clarified 380:7 | cleaner 194:22 |
| 372:13 373:19 | 183:15 187:8 | chlorine 43:11 | clarifies 24:17 | 264:21 |

| | | | | |
|----------------------------|---------------------------|--------------------------|--------------------------|---------------------------|
| cleaners 27:15 | coffee 100:4,6 | 379:6 | 18:22 19:8,13 | 221:22 229:9 |
| cleanest 134:2 | 283:21 284:22 | comes 21:2 44:6 | 20:5 22:11 25:9 | 235:20 241:15 |
| cleaning 153:8 | 285:17 287:1 | 66:10 71:16 75:5 | 45:9 46:2 50:2 | 299:16 358:21 |
| clear 24:22 26:4,18 | cohort 332:14 | 103:6 145:18 | 52:18 54:9 67:20 | 361:1 368:12,15 |
| 31:10,13 59:18 | cold 336:22 | 155:14 181:9 | 83:6 87:4 88:7 | 372:8 374:15 |
| 76:14 103:1 | coldest 278:1 | 262:2 335:15 | 91:11 93:12,22 | 378:20,22 379:2 |
| 108:16 113:10 | Colehour 1:18 | 347:3 | 96:12 98:10,15,19 | committees 378:5,7 |
| 118:2 128:15,20 | 116:11 119:7 | comfort 168:7 | 101:11 102:3 | Committee's 42:3 |
| 133:8 137:3,5 | 163:10 236:18 | comfortable | 103:4 105:4 | 88:5 110:15 |
| 138:3 141:8,8 | 280:16 287:22 | 221:22 273:11 | 112:19 118:1 | common 39:12 |
| 144:21 150:21 | 295:4 298:16 | 286:15 313:13 | 124:20 170:12,22 | commonality 84:7 |
| 165:3,7,9 171:6 | 364:16 379:9 | 324:12 358:9,11 | 171:1 177:5 191:3 | 84:14 |
| 175:1 176:11,19 | 381:10 | comfortably | 193:18,22 202:2 | commonly 257:5 |
| 182:18 186:17 | coli 42:22 | 119:12 | 211:21 212:20 | communicate |
| 188:9 195:10 | collaborating | coming 40:2 66:22 | 213:5 222:14 | 314:3 |
| 220:13 232:5 | 205:18 | 98:18 112:18 | 248:19 249:17 | communicated |
| 260:3 266:4 | Collapse 47:8,16 | 147:4,6,7 153:18 | 250:2 271:1 277:3 | 26:7 379:22 |
| 284:15 288:3 | collective 327:11 | 171:6 241:14,17 | 288:9 292:3 320:6 | communication |
| 291:3 305:2 | 336:8 | 286:14 317:14 | 368:7 370:10 | 201:8 370:21 |
| 315:13 320:8 | collectively 69:22 | 322:16 | commerce 156:3 | communities |
| 321:7 326:9 | college 318:16 | commend 307:3 | commercial 13:1 | 337:14 |
| cleared 58:6 | Colony 47:7,15 | comment 7:21 8:21 | 13:11 31:9,15 | community 23:1 |
| clearly 10:5 20:9 | colorblind 36:13 | 11:6 12:9 14:18 | 47:1 138:17 | 78:8 83:10 84:6 |
| 101:4 128:2 | colors 97:11 | 16:19 21:11,14 | 331:14 | 175:2 176:13 |
| 181:15 199:11 | combination 22:5 | 25:20 28:5 35:17 | commercialization | 277:17 278:10,18 |
| 281:3 310:7 | combine 379:2 | 46:13 81:18 90:19 | 331:1 | 279:7,22 286:8 |
| clients 289:17 | combined 43:13 | 97:1 105:4 106:2 | commercially | 289:13,21 290:19 |
| climate 315:17,19 | 61:2 171:22 173:5 | 117:20 131:20 | 146:20 | 296:1 299:5 306:5 |
| 316:8 321:10 | come 5:13 23:2 | 169:19 174:15 | commingling | 308:5,6 309:9,19 |
| 351:17 | 36:3 40:17 58:2 | 187:5 190:3,22 | 346:12 | 315:4,15 327:22 |
| clinical 315:6 | 64:1 71:15 73:19 | 191:12 211:8 | commitment 290:2 | 332:12,21 338:20 |
| close 327:18 331:10 | 84:22 100:22 | 212:3 215:19 | 298:19 | 348:4 360:14 |
| 332:13,18 333:13 | 104:21 105:8 | 218:22 233:12 | committed 64:21 | 371:4 373:16 |
| 391:14 | 112:2 125:4 | 264:10 273:22 | 301:10 309:9 | 375:1 382:18 |
| closed 308:17 | 169:16 203:9 | 277:5 364:4 367:3 | 341:2,17 349:7,12 | 392:6 |
| closely 68:19 75:17 | 219:9,12 225:16 | 368:7 386:12 | committee 9:9 | companies 19:1,2 |
| 76:1 213:19 | 261:22 262:6 | commentary 271:7 | 11:18 17:7 23:9 | 89:12,14 97:14 |
| closer 333:9 391:21 | 269:11 271:3 | 292:13 | 27:17 37:21 38:2 | 113:5 |
| closing 4:14 273:14 | 277:13 278:20 | commented 10:20 | 38:10 56:8 89:21 | company 8:9 |
| cloud 153:21 | 279:14 281:22 | 24:21 42:8 179:10 | 90:19 91:12,15 | 324:11 |
| 328:22 | 283:22 284:1,20 | commenters 21:10 | 94:2,15 95:3 96:6 | company's 109:4 |
| clued 264:13 | 288:12 290:12 | 21:17 24:21 | 97:22 106:3,14 | comparatively |
| coastal 243:3 | 292:6 296:14 | 181:12 | 107:21 112:18 | 90:11 |
| cocker 221:14 | 297:21 299:6 | commenting 102:5 | 119:9 121:21 | compare 234:21 |
| cockroaches | 301:2 311:1 | 163:13 308:18 | 127:20 136:15 | 289:2 |
| 233:21 | 337:14 362:14 | comments 3:6,7,18 | 169:2,16 190:6 | compared 31:15 |
| codling 99:19 | 367:13,15 370:13 | 3:20 10:7 18:19 | 217:1 219:3 221:2 | 234:11 271:5 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 292:1 | components 74:8 84:8 179:2 | 233:13 241:14 251:12 275:13,20 276:1 280:7,8 291:2 305:15 306:1 308:1 331:20 334:6,21 335:17 336:1 357:18,20 360:15 | 152:14 206:16 confusion 63:13 119:22 155:14 198:4 225:14 256:14 confusions 102:10 connection 47:15 184:3 conscience 335:18 consensus 253:10 253:11,20 255:12 295:6 consequences 97:2 consider 5:6 23:3 29:19 77:7 131:11 134:8,10 138:13 266:15 277:15 281:5 283:15 323:15 360:6 367:7 considerable 126:9 170:17 considerate 360:14 consideration 92:14 133:1 209:5 214:7 356:1 361:11 Considerations 27:8 considered 92:17 93:3,18 140:17 159:18 207:2 213:13 considering 21:17 45:8 50:1 54:8 119:2 134:9 303:13 considers 43:2 126:19 consistency 13:8 32:5 166:1 170:17 176:20 178:15 254:19 consistent 19:20 28:18 138:21 253:19 255:2 325:16 | constant 66:16 constantly 66:10 constituencies 328:2 constituent 295:13 constituents 257:11 257:19,21 258:3 258:17 311:8 316:11 317:17 constitute 160:5 constitutes 143:2 160:3 constricts 262:7 construct 382:21 construction 261:15 consultant 42:8 consultants 19:4 consultation 359:20 consumed 138:17 consumer 19:18 49:5,15 57:2 60:20 64:17 66:1 68:14,14 71:12,13 71:14 72:8,10,12 78:11 79:2 83:14 85:16 86:4 155:17 174:4 192:18 193:4,10 291:2,13 291:17,17,18,21 295:15 298:13 302:12 320:22 325:16 334:20 392:12 consumers 43:16 46:6 49:3,8 51:11 51:16 52:4,14,20 54:4 61:5 62:2,5 67:9,10,16 68:1,5 69:11,18 70:22 71:5,9 72:1 73:16 73:20 79:15 83:8 83:8 84:10 85:6 86:19 87:7,12,18 156:6 158:4 170:3 275:12,14,20 |
| comparison 102:4 compassion 274:21 compatibility 13:8 119:11 compatible 42:15 100:10 compelled 219:4 328:18 compelling 329:3 334:5 competitive 82:18 104:19 competitor 82:13 compiling 88:22 complete 92:19 215:7,11,21 221:6 296:8 307:6 completed 8:18 12:6 14:16 16:15 207:22 296:20 304:20 369:5 completely 100:10 187:10 287:3,4 322:22 333:12 348:1,6,10 completes 216:12 complex 58:15 103:2 complexity 130:19 compliance 3:16,20 104:6 158:12 164:18 215:22 266:5 306:12 349:9 368:22 compliant 165:20 complicated 41:6 162:13 178:10 186:22 187:12,13 190:9 322:19 358:15 complicates 33:11 complies 94:3 comply 216:4 component 73:8 74:14 131:2 231:5 303:14 | composition 186:4 compost 382:20 compound 234:4 compounds 234:9 compromise 95:21 281:7,11,13,16 282:5 300:9 305:19 306:22 330:18 compromised 300:6 con 19:6 conceive 158:22 concentrates 172:20 concentration 172:22 concept 6:3 187:11 concepts 349:3 conceptually 184:20 347:21 concern 28:9 57:1 63:5 67:5 74:9 82:5,7 87:16 129:4 162:22 206:12 207:3 261:14 262:7 274:21 276:5 278:4 315:1,8 318:14 332:17,19 336:3 353:3 367:4 367:5 concerned 58:21 157:21 192:14 193:2 231:22 232:18 239:19 240:10 284:12 294:16 308:9,13 315:5 318:9 concerns 15:3 21:16 43:15 44:22 77:16 82:6 85:18 86:19 162:19 188:16 229:11,15 229:18,20 231:15 | concludes 35:12 106:2 183:19 191:7 conclusion 283:6 conclusions 86:14 286:2 conclusive 47:6 concrete 324:15 concurr 184:19 condition 182:20 363:22 conditions 299:1 346:5,8,10 362:18 386:6 conduct 33:16 211:19 conducted 193:15 376:1 conference 198:9 329:6 confidence 54:4 67:11 85:7 120:2 267:1 291:13 320:22 confident 49:20 confidential 9:16 26:10,20 43:6 377:19 confidently 44:10 confines 118:13 confirm 46:3 confirmed 13:1,12 15:13 46:13 76:7 confirms 52:4 conflict 380:9,11 confronted 311:13 confused 126:12 152:15 274:7 confusing 63:11 | | |

| | | | | |
|---------------------------|----------------------------|----------------------------|---------------------------|-----------------------------|
| 279:16 287:5 | 187:2 321:11 | 356:19 | 230:17 245:21 | 104:19 |
| 289:18 295:16 | continues 66:2 | conventionally | 276:17 365:19 | credit 189:16 |
| 296:5,7 298:7 | 182:6 199:12 | 70:7 | 387:13 | crises 312:13 |
| 306:1 307:11 | 216:14 | conversation | corrected 43:21 | crisis 312:13,16 |
| 308:8,21 309:6,21 | continuing 373:15 | 235:16 251:10 | correctly 15:22 | criteria 9:14 10:13 |
| 310:2,12 316:5 | 375:5 | 255:21 262:15 | 189:14 324:5 | 13:3,4,7,10,11 |
| 318:13 320:19 | continuously 67:14 | 264:16,17,21,22 | costs 357:11 | 15:11,12 17:8 |
| 325:22 326:3,11 | contradictory | 269:10 270:12 | counsel 92:4 355:1 | 20:12 21:8 23:17 |
| 334:22 335:2,17 | 199:2 | 273:3 283:2 | count 18:20 302:19 | 23:20,21,21 24:22 |
| 360:7 | contrary 232:12 | 288:15 298:2 | countable 221:3 | 28:11,22 71:14 |
| contact 100:22 | 233:2,8 | 313:15 326:14 | counted 175:15 | 75:18 79:17 80:2 |
| 345:8 | contribute 182:15 | 378:19 | counting 332:12 | 89:18 104:9 |
| contain 46:7 51:17 | contributed 53:21 | conversations | countless 221:4 | 127:19 128:13,18 |
| 61:6 102:17 | 64:12 | 35:16 292:20 | 349:16 | 129:1 134:4 137:7 |
| 180:10 182:7 | contributes 74:8 | 304:10 325:2,12 | country 6:4,12 | 137:8,9 141:15 |
| 199:13 | contributing | conversation/dis... | 278:8 288:20 | 142:2,13,17 |
| contained 200:11 | 180:17 | 226:8 | 317:2,3 338:2 | 150:15 164:19 |
| containing 52:16 | control 38:17 39:14 | conversion 306:13 | 392:18 | 238:16 251:21 |
| 61:17 173:3 176:4 | 42:21 99:13,14 | convert 351:8 | counts 249:22 | 253:8 263:9,19 |
| contains 243:12 | 195:13 240:22 | 366:1 | couple 69:14 75:22 | 266:5 |
| contaminants | 243:1,17,19 | converted 304:7 | 76:12 98:14 210:3 | criterion 42:22 |
| 382:19 | 271:22 272:1,5 | converting 310:14 | 214:5,13 259:20 | critical 161:8 193:7 |
| contaminate 100:8 | 278:12 279:2,6 | convey 359:11 | 327:4 350:5,8 | 302:21 330:5 |
| contamination | 284:6 309:12 | cookies 51:22 | 358:21 391:15 | 333:14 |
| 303:5 | 322:9 341:7 | cooler 240:9 | courage 323:5 | critically 70:21 |
| contemplate | 344:11 345:19 | cooperative 351:5 | course 31:14 181:8 | 322:1 |
| 310:10 | 346:4 347:5,6 | coordination 39:2 | 183:7 229:22 | criticism 328:6 |
| content 15:1 51:6 | 353:14 358:6 | copies 88:20 | 239:15 262:3 | crop 38:6 48:16 |
| 177:20 180:3,16 | controlled 229:16 | copper 234:9,11 | cover 141:12 | 98:11 170:16 |
| 180:17 181:5,19 | controlling 242:18 | copy 343:22 | 241:12 348:17 | 195:8 207:8,10 |
| 181:20 182:16 | 321:9 | corn 53:13 62:11 | covered 27:4 142:7 | 214:4,18 215:14 |
| 185:12 370:3 | convened 1:12 | Cornucopia 41:22 | 198:12 199:11 | 237:18 260:4 |
| context 21:15 | convenience | 42:2,17 45:18 | 276:3 | 271:2 300:12 |
| 151:18 321:22 | 195:21 | 46:4 50:22 53:14 | covers 141:15 | 312:19 313:1 |
| 329:10,15,18,19 | convenient 194:9 | 54:9 55:19 60:22 | 381:8 | 344:7 345:7 |
| 329:21 333:14,14 | convening 377:21 | 67:4 69:6 73:15 | cows 362:14 | 346:17 351:1,10 |
| 341:15 | conventional 42:20 | 86:4,9 170:14 | craft 360:15 | 358:21 381:14 |
| continuation 34:19 | 46:10,14 47:18,20 | 192:22 193:15 | crafted 276:6 | crooks 95:7 100:8 |
| continue 35:8 | 48:3,12,15 51:12 | Cornucopia's | crafters 168:8 | 164:21 165:2,3,6 |
| 63:19 101:7 | 52:1,9,12 53:1,2 | 71:20 | create 6:12 90:10 | 167:3 235:20 |
| 102:19 167:16 | 54:16,17,22 55:1 | corporation 16:7 | 104:16 139:16 | 241:15,17 261:11 |
| 195:9 200:19 | 69:15 89:14 97:18 | 53:21 | 345:17 351:15 | 271:17 329:6 |
| 236:5 298:10 | 139:17,18 244:7 | corporations 39:7 | 352:8 | 331:12 336:19 |
| 320:12 322:10 | 297:7,10,15 | 49:1 | created 392:6 | 337:2 361:1 |
| 373:12 378:3 | 306:14 310:15 | correct 28:19 36:1 | creates 275:10 | 367:20 368:13 |
| continued 4:10 | 312:14,20 322:5 | 149:5 150:18 | 352:3 | 370:12,14 371:21 |
| 60:18 101:3,5 | 333:2,8 351:9 | 160:15 162:9 | creating 65:20 | 381:13,20 |

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 178:11 283:20 348:2 details 9:22 21:20 249:8 detect 291:6 detectable 335:7 determination 169:20 170:6 187:4 380:21 determine 9:20 176:21 183:5,7 186:20 190:11 347:9 determined 147:13 174:2 determining 174:7 210:4 detrimental 194:13 devastated 97:16 devastating 305:1 344:14 develop 38:16 78:3 181:17 242:12 257:8 259:22 333:7 368:4,8 371:8 390:9 developed 19:15 83:22 84:1 177:13 216:15 developing 233:1 234:17 330:16 development 8:17 12:4 14:14 16:14 170:1 213:7 309:1 322:7 335:9 379:11 DHA 76:4,17 157:19 dialogue 282:4 369:18 373:15 Dibromo-5,5-Di... 16:3 Dickson 1:19 3:19 9:6,8 107:15,20 110:1,14 111:12 113:22 115:11 116:17 121:16 | 122:22 124:5 169:8 183:20 186:14 188:3 189:9,11,21 190:2 190:20 191:6 197:6,14,18 198:6 198:13 199:5 200:15 201:5,18 202:1,5,19 225:5 226:22 228:9 237:4 245:7 247:9 250:9 268:11 322:16 339:10 343:2 368:18 390:4 dictate 293:16 dictates 293:18 die 86:7 diet 49:4 220:16 374:10,20 376:19 dietary 12:16 14:22 diets 375:2,7 difference 136:1 153:2,20 163:3 184:10 185:10,11 186:3 233:16 280:13 315:7 362:15 differences 95:20 293:2 different 34:17 54:16 56:19 80:6 86:12,13,13 98:5 134:20 139:12,16 139:20 141:16 144:7 145:17 164:21 170:12 182:19 187:13 190:16 205:1 239:14 283:9 289:15 291:5 302:10 309:15 311:5 313:20 323:9 326:3 334:4 335:10 350:5 353:18 379:6 differentiated | 139:17,21 difficult 9:18 33:9 33:19 63:21 90:16 119:14 136:15 187:20 271:11 294:5 295:18,19 303:18 311:14,15 322:19 326:15 392:2 difficulties 65:10 190:10 difficulty 294:19 304:4 dig 266:2 319:10 digested 360:12 dilemma 185:7 375:7 diligence 217:19 DiMatteo 170:15 dinners 323:3 dioxide 53:10 382:9 dipping 248:3 direct 49:13 234:3 286:21 292:19 330:11,11 directed 138:12 direction 77:22 138:20 371:11 directions 334:5 directly 21:12 152:11,18 155:5,8 282:4 284:14 286:11 287:5 323:12,13 director 2:16 65:9 69:5 102:2 disadvantage 82:18 104:20 disagree 42:7 130:18 disagreement 134:6 disappeared 287:1 disappointment 324:8 disaster 51:14 | disastrous 53:6 disclosed 26:21 27:2 32:21 210:7 disclosure 32:8,12 220:2 disclosures 270:19 disconnected 316:21 discovered 75:21 76:2,11 87:1 discuss 77:14 125:3 125:6,8 126:5 158:15 236:5,9 256:8 273:5 344:6 368:9 discussed 15:3 43:10 132:5 159:7 159:8 168:19 263:4 274:13 discussing 125:12 125:15 132:19 133:9 198:9 discussion 3:15 9:5 11:6 15:5,9 17:19 17:20 18:5 26:15 28:5 31:22 63:4 72:21 75:6 106:6 106:15 107:11 108:5 109:9 110:21 111:4 112:15,17 113:14 114:20 115:1 116:11 117:17 118:6 119:7 120:4 122:5 123:11 124:21 125:18 126:2 132:9 134:10 135:12 136:10 150:13,14 150:16,19 151:2 152:9 163:12 168:7,11 170:9 174:20 175:20 176:10 181:9 190:17 197:19 218:20 219:17,20 224:11 227:18 | 230:8 231:4,19 235:18 236:8,9,14 237:22 246:16,21 248:6,18 249:16 252:20,22 262:19 263:1 268:6 273:1 273:21 302:2,3 310:21 314:11 338:22 341:12 342:21 343:21 347:16 349:15 362:4 365:21 369:11,21 372:3 374:11,21 376:19 377:1,7 378:2 379:13 386:19 discussions 9:3 40:5 120:18 188:15 244:17 283:11 312:9 317:12 373:13 disease 222:15 235:8 240:22 271:22 345:1,10 345:18 346:7 diseases 235:6 242:17 disease-resistant 296:15 disinfectant 16:22 Disorder 47:8,16 disparaging 67:20 dispelled 229:18 dispensers 100:5 207:15 displace 334:6 display 172:19 disposal 44:2 disrespect 290:6 disrupt 338:15 disrupter 45:4 disrupters 158:21 disrupting 99:18 235:15 Disruption 310:8 distinct 73:9 185:10 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| distinction 56:18 59:21 144:14 241:6 356:16 | Documenters 170:10 | draft 163:2 | easily 183:2 | 341:18 351:3 352:1 |
| distinguish 24:14 71:16 142:19 | documents 88:15 88:16 89:5 371:2 | drafted 212:1 384:1 | east 45:21 309:14 | either/or 302:1 |
| distinguishing 144:4 | dog 219:6 221:5,20 222:1 | dramatic 259:3 326:13 | Eastern 194:10 | elaboration 201:8 |
| distract 358:15 | dogs 219:14 220:3 221:13 | drastically 46:22 | easy 78:6 188:17 279:5 285:5 303:21 304:10 319:12 363:20,21 | elected 192:17 |
| distribute 330:22 | doing 23:12 30:11 34:10,19 35:8 37:3 38:16 59:2 62:4 63:22 95:11 95:13 130:6,11 133:8 144:5,6,8 173:18 178:7 205:17 223:3 254:2 264:18 311:19 314:1,1 337:2,8 352:17 353:2 362:10,15 362:17 363:10 376:16 | draw 359:1 | eat 49:4,14,20 51:10 83:14 296:13 320:13 | element 317:5 |
| distribution 179:16 221:17 | dollars 53:22 289:4 294:19 391:5 | drinking 17:1 100:5 | eating 303:6 | eliminate 296:21 353:16 |
| dis-empowered 308:16 | domain 20:7 | driest 278:1 | economic 322:13 | eliminating 296:11 |
| divert 351:1 | domestic 118:16 306:8 | drill 141:6 | economical 100:12 | emailed 343:22 |
| dividing 171:21 172:12 173:5 | dominate 243:14 | drilling 157:2 165:22 | Ecuador 39:1,6 | emergency 283:16 312:18 344:10,17 344:22 345:10,17 347:22 354:4 355:19,22 356:9 362:2,22 365:9,17 366:4,9 383:19 384:7,10 386:6,11 |
| division 2:16,18 6:8 206:6 280:11 | Donald 192:1 | drive 176:20 330:4 | edge 159:4 278:11 | emphasize 376:18 |
| doable 349:11,19 | door 48:11 82:13 297:11 | driving 157:15 330:1,5 | edited 263:18 | empirical 333:1 |
| docket 11:11 30:19 103:6 370:21 371:16 | doors 282:22 | drought 316:9 | edits 170:19 | employed 346:5 |
| document 7:16,19 8:1 17:18 18:3,16 22:10 26:16 31:11 32:9 102:11 128:9 131:4,13,14 133:21 134:12 136:17,19 151:6 151:10,14 152:5,5 158:7 159:9 169:18 174:20 183:14 187:8 198:1 251:17,20 252:6 253:15 256:16 259:4,14 266:1,20 346:3 360:4 368:20 369:11,21 371:2 371:12 372:3 374:11,21 376:20 377:1 378:2 379:13 | dozen 89:1 315:9 | drum 67:1 | educate 307:11 | en 46:21 |
| documentation 88:11,21 180:2 181:4 189:15,17 | dozens 48:5 | dual 255:4 | effect 34:10 44:14 139:7,20 143:7 229:17 231:21 234:3,7,10 275:14 365:16 | enable 25:11 |
| documented 10:3 | Dr 8:4,6 11:11,13 13:22 14:1 15:20 16:1 17:5 85:19 169:12 205:9,13 217:12,16 218:14 294:5 315:10 334:7 335:5 | Dude 328:11 | effective 242:18 | enables 32:10 366:4 |
| | | due 217:19 344:22 | effects 43:7 44:1,11 44:16 231:22 232:6 240:11 | encourage 179:11 376:22 |
| | | dueling 264:19 | efficacy 244:6 321:8 | encouraging 89:6 375:10 |
| | | dug 315:1 | efficiency 213:6 | endangering 54:6 |
| | | duty 77:3 | efficient 53:9 | ended 231:6 281:8 |
| | | dwelling 6:4 | effort 266:20 296:21 357:9 | endlessly 327:8 |
| | | dyed-in-the 333:1 | efforts 308:10 | endocrine 44:17 45:4 158:21 |
| | | D.C 392:17 | EFIS 264:8 | ENDORSE 243:21 |
| | | <hr/> | eight 239:7 287:20 373:8 374:8 | endorsed 27:17 |
| | | E | either 59:19 69:17 70:13 71:10,18 78:14 81:7 119:22 147:14 151:21 161:14 166:17 180:11,20 207:5 208:9 210:11 281:18 298:7 305:4 317:6 328:21 336:5 | ends 79:5 |
| | | E 42:21 | effort 266:20 296:21 357:9 | energy 266:19 |
| | | earlier 40:3 65:9 72:22 99:9 103:22 158:14 190:3 199:6 207:18 239:21 251:21 303:20 310:19 315:19 369:5 | effort 266:20 296:21 357:9 | |
| | | earliest 305:18 | efforts 308:10 | |
| | | early 95:5 327:1 | eight 239:7 287:20 373:8 374:8 | |
| | | earth 50:17 | either 59:19 69:17 70:13 71:10,18 78:14 81:7 119:22 147:14 151:21 161:14 166:17 180:11,20 207:5 208:9 210:11 281:18 298:7 305:4 317:6 328:21 336:5 | |
| | | earthworms 229:20 | either 59:19 69:17 70:13 71:10,18 78:14 81:7 119:22 147:14 151:21 161:14 166:17 180:11,20 207:5 208:9 210:11 281:18 298:7 305:4 317:6 328:21 336:5 | |
| | | ease 276:5 | either 59:19 69:17 70:13 71:10,18 78:14 81:7 119:22 147:14 151:21 161:14 166:17 180:11,20 207:5 208:9 210:11 281:18 298:7 305:4 317:6 328:21 336:5 | |
| | | easier 126:16 179:12 356:22 | either 59:19 69:17 70:13 71:10,18 78:14 81:7 119:22 147:14 151:21 161:14 166:17 180:11,20 207:5 208:9 210:11 281:18 298:7 305:4 317:6 328:21 336:5 | |

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 357:8 enforce 32:16 enforcement 391:2 391:4 engage 323:2 engaged 130:20 engender 25:11 engineered 15:7 48:9,16 53:18 55:10 56:2 62:11 73:8,11 74:16 75:1 engineering 49:18 49:19,22 53:12,20 119:19 enormously 353:17 ensure 32:8 70:6 74:20 79:21 104:4 164:10,10 165:19 291:12 325:20 ensures 65:22 entail 381:3 enter 273:1 entering 273:12 entertain 151:1 entire 43:7 97:16 197:10 269:19 310:10 entirely 54:2 90:10 308:18 327:17 332:19 entirety 307:17 entities 316:17 entry 280:2 enumerates 361:20 environment 6:5 13:3 15:5 44:1 48:1 52:22 232:14 275:15 317:11 326:4 332:7 392:7 environmental 10:3 43:15 44:6,7 44:11 195:6 229:20 302:16 315:15 317:15 338:2 environmentalist | 300:4 environmentalists 315:18 316:5 environmentally 53:3,6 environments 333:2 enzyme 53:15 54:21 55:20,22 155:6 enzymes 74:2,4,5 97:12 167:13 enzyme-by-enz... 167:14 eons 327:3 EPA 43:1 45:2 70:3 98:22 99:4 100:1 100:18 205:17 206:3,7,12,20 207:3,5,20,22 208:7,8,16,19,20 210:5 213:19 335:9 EPA's 100:19 206:15 equal 136:4,7 equally 302:17 equation 83:19 130:16 271:12 escaped 47:6 especially 22:18 91:6 165:3 240:12 243:2 317:14 321:1,9 328:21 332:17 350:11 essence 171:10 173:18 181:9 337:17 essential 37:14,18 48:19 51:19,22 73:18 74:14 130:8 329:19 essentiality 10:1 13:5,6 90:21 91:2 119:11 essentially 206:14 375:17 379:19 | Essex 192:3 establish 183:1 established 102:20 174:12 208:9 278:15 350:16 estimate 212:5 estimates 213:1 et 127:21,21 168:20 316:10 368:3 etcetera 25:1 348:12 Ethanol 53:10 ethics 69:8 70:18 EU 349:9 Europe 48:8 European 321:20 evaluate 363:4,8 evaluated 92:13 evaluating 73:7 214:18 evaluation 8:18 9:11 12:5 13:2 14:15 15:12 16:15 17:8 93:1,1 210:18 evaluations 93:12 evening 317:19 eventually 23:14 243:14 299:6 everybody 137:5 179:7 184:19 275:1 279:14 281:20 284:7,11 299:21 313:22 334:1,2 341:1 351:18 357:6 everybody's 173:18 337:21 342:20 353:1 everyday 317:3 everyone's 5:5 269:17 285:16 308:1 evidence 47:10 146:19 320:10 333:1 334:6 eviscerated 325:6 | exact 30:10 117:19 exactly 22:2 37:5 55:21 137:4 141:20 149:21 157:21 190:7 253:13 283:1 288:15 examine 377:13 example 21:1 42:11 57:7 60:7 62:9 81:12 82:1 120:4 120:7,13 179:3 238:15 329:9 333:6 380:7 examples 178:12 183:2 exasperation 67:22 excellent 35:11 88:6 126:1 170:12 exceptions 238:6,7 238:8,9,10,14 excipients 165:9 167:11 256:12 260:7 excited 270:1 370:19 excluded 75:16 119:20 159:18 175:11 176:6,16 176:16,22 178:8 183:8 371:2,12,21 374:14 excluding 171:22 172:2,5,13,16 173:7,8 exclusion 178:5 190:3 369:22 exclusively 282:17 excruciatingly 326:15 excuse 35:16 54:12 64:2 216:17 235:14 386:20 executive 1:12 196:10 378:19 380:1,12 exempt 208:20 | exemptions 98:21 99:3 101:5 208:10 369:8 exhaustively 63:10 exist 43:9,15 44:11 44:22 50:15 51:20 329:22 332:5 existence 291:19 350:22 existing 34:9 59:21 199:1 213:21 330:19 331:13 350:15 354:4,11 exists 139:11 380:14 expanded 46:22 expansion 181:14 expect 28:4 49:8 51:16 70:22 71:1 71:3,9 170:3 184:5 189:4 315:1 321:11 325:22 expectation 71:15 124:19 expectations 19:18 64:18 71:13 325:17 326:2,10 expects 70:19 155:17 expense 293:12 experience 184:15 233:1 234:20 279:1 283:20 301:8 302:5 321:17 331:5 333:4 experienced 312:14 experiencing 386:7 experimental 279:8 expertise 266:16 expiration 40:13 40:18 84:20 271:19 288:2 305:21 306:18,21 309:19 345:15 expire 344:9 explain 131:16 |
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| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 152:12 162:18 248:21 259:16 293:1 314:8 344:19 explained 57:2 152:16 256:6 259:16 explaining 140:3 324:12 explanation 47:6 131:18 179:17 194:13 240:18 324:22 explanations 229:14 explanatory 180:6 explicitly 29:13 exploded 89:3 exploring 83:1 375:8 Expo 95:17 exposing 49:21 exposure 50:10 158:21 318:10 exposures 50:13 express 314:13 expressed 373:17 expressly 92:16 extend 288:2 293:20 extended 324:19 extending 283:6 301:14 345:14 extension 275:6 295:20 305:17 309:20 310:2,17 324:13 327:19 330:15 333:15 340:18 extensions 321:11 extensive 100:18 176:19 201:2 249:8 extent 272:7 extra 223:3 324:17 extract 9:21 177:16 extractant 76:18 | extraction 9:13,19 extracts 9:13 177:14 extreme 346:9 extremely 68:10 90:4 158:17 178:10 182:22 extremes 277:22 extremist 328:19 eye 291:16 292:21 <hr/> F <hr/> face 321:2,10 faced 64:3 74:10,11 faces 41:1 facets 328:15 facilitate 344:17 facilities 89:2 facing 281:2 fact 39:3 44:18 53:20 60:15 62:2 63:4,18 64:2,3 66:21 67:9,15 73:17 87:2 113:4 118:11 157:9 178:9 225:16 232:19 234:9 302:16 377:18 390:10 factor 22:12 47:13 302:11 factored 370:4 factors 119:1 303:13 factual 129:21 fact-based 306:18 Fahrenheit 240:6 fail 37:12 313:1 fails 42:22 116:3 124:9 227:7 245:22 250:21 300:8 340:4,18 fair 15:8 238:10 fairly 304:17 faith 119:18 320:2 328:1 329:16 386:4 | fall 38:3,12 73:9 139:18 209:8,11 213:19 214:8 215:3 216:11 279:9 330:20 368:21 369:2 371:6,17 372:4,12 376:4 377:3 379:7 382:5 383:2 familiar 5:5 41:1 99:16 173:16 214:17 families 305:3 314:15 325:11 family 95:5 192:15 192:16 195:16 317:21 fancy 354:10 fantastic 331:16 far 47:6 56:18 235:1 239:12 240:16 264:17 275:21 330:20 333:5 farm 10:20 49:14 147:11,12 289:17 293:17,18,21 297:4 318:9,9 346:3 382:19 farmer 45:20 86:20 277:16 286:6,21 291:21 292:19 302:13 303:15 338:3,4,4 farmers 86:22 232:22 233:4,4 278:16,17 284:14 285:9 286:7 289:16 291:1,19 294:2 297:4 298:20 304:16,21 306:1,10 310:12 322:14 338:5 farmer's 372:6 farming 100:10 109:4 293:3 298:6 farms 84:1 97:17 | 298:18 farm/Mother 294:1 farther 331:9 fashion 76:20 242:2 faster 125:19 264:21 faulty 72:4 favor 305:17,19 327:19 388:4 favored 25:16 favoring 118:18 FAVRE 1:19 110:10 111:21 114:9 115:20 117:4,15 121:11 122:17 123:22 162:18 197:16 202:14 218:2,12 218:17 219:19 220:1,6,11 222:12 222:20 223:8,12 223:19,22 224:10 224:22 225:13 226:4,6,10,17 227:9,15,18,20 228:4 233:11 236:21 245:2 247:18 250:18 259:2,8 268:20 303:17 339:21 343:11 374:2 389:21 FDA 24:5 70:2 72:4 79:1 136:19 137:19 138:14 139:7 140:2 178:4 178:6 FDA's 351:19 FDA-approved 51:7 fear 133:18 feasible 275:9 February 14:4 16:6 209:7 federal 212:2,8 214:1 284:4 | 344:22 345:9 feed 165:11 227:11 374:6 feedback 209:7 210:17 211:18 212:10 361:5 374:12,19 375:1,6 375:14 377:3 feeding 221:20 feel 23:7 32:8 46:6 49:20 52:14 61:10 71:5 77:19 87:17 112:22 130:3,9 131:10 138:5 191:5 197:21 199:5 234:13 269:3,20 274:20 275:6 280:8 281:15 282:3,7 283:2 286:5,15 293:8 301:16,17 302:1,2,4 304:16 305:9 306:17 307:5,10 308:7,8 308:10,15,16,18 313:13 317:4,18 319:22 324:12 327:5,8 330:15 331:18 335:13 339:6 340:18 347:22 348:15 358:9,11 361:17 362:19 364:5 feeling 68:1 285:20 286:3 287:8 317:6 364:22 381:4 feelings 259:1 347:20 feels 307:15 309:20 FELDMAN 1:20 31:20 32:3,17 41:2,4 64:10,14 65:7,13 72:20 74:10 76:13 103:15,19 104:15 105:6,19 109:17 109:21 111:10 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|--------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| 113:20 116:1 | 17:7 112:20 | 146:10 151:14,15 | 30:13 31:1 38:22 | flourish 6:19 |
| 117:7 121:14 | 179:18 219:3 | 151:16,18 154:2 | 47:8 82:6 106:22 | flow 205:7 235:15 |
| 122:20 124:3 | 221:12,18 | 156:5 165:10 | 107:22 116:6 | fluid 172:12,14 |
| 128:17 135:6,10 | Fernandez-Salva... | 254:18 258:7 | 124:22 127:5,16 | fluoride 53:8 |
| 136:12 139:1,4 | 3:14 98:6 101:19 | 337:11,19 376:6 | 129:1 133:1 134:4 | fly 258:12 259:6 |
| 143:3,6,21 144:3 | 101:21 102:1 | finalize 212:20 | 142:3 163:17 | focus 76:17 130:7 |
| 144:11,22 145:3,5 | 104:10 105:3,13 | 213:5 359:7 | 171:7 176:18 | focused 15:6 77:8 |
| 145:8,12,14 146:1 | 105:20 140:5 | finalized 27:6 | 204:5 205:3 | fold 170:22 171:1 |
| 146:13 148:1,11 | fertility 233:1,6 | finally 48:18 49:10 | 214:13 216:13 | 377:17 |
| 148:16,19 149:3,6 | fertilizer 147:18 | 133:12 195:2 | 223:7 225:19 | folks 9:3 100:5 |
| 149:15,18,22 | fertilizers 97:20 | 304:18 369:19 | 236:19 245:1 | 198:22 243:7 |
| 150:3 155:13 | fetal 159:2 | financial 249:21 | 249:3,9 253:4 | follow 25:2 71:21 |
| 158:1 162:1 164:1 | FFDCA 139:7,10 | 297:5 | 255:16,18,21 | 72:6 107:10 |
| 166:9 167:5,9,20 | fiber 7:18,18 11:10 | find 12:22 23:1 | 256:20 275:18 | 130:22 185:7 |
| 184:2,18 185:18 | 11:14,20,22 12:16 | 30:1 39:13 73:20 | 277:2 296:5 | 266:4 278:9 312:2 |
| 185:22 186:6,8 | 12:18 13:21 14:2 | 84:6 102:22 119:2 | 299:19 311:12,16 | followed 221:1 |
| 197:21 198:20 | 14:7,9,21 15:1 | 120:11,15 127:6 | 315:1 326:19 | following 25:5 |
| 199:20 200:1,4,13 | 46:1,11 47:19 | 131:7 143:13 | 328:8 340:12 | 30:16,21 78:18 |
| 202:17 217:2 | 48:3,12,20 49:4,5 | 193:16 256:17 | 342:12 353:10 | 80:9 93:10 129:13 |
| 220:8,12 222:4 | 51:3,4,6,12 52:2 | 266:2 285:17 | 368:17 386:15 | 129:18 142:16 |
| 224:9 225:3 | 53:2,11,16,19 | 289:7 313:8 314:4 | fit 74:22 75:18 | 160:14,21 161:5,6 |
| 226:20 228:7 | 54:2,22 55:1 56:1 | 337:15,15 358:5 | 347:1 354:4 | 161:17 162:16,20 |
| 229:3 230:10,14 | 70:6,7 73:2,14,17 | 362:18 376:7 | fits 75:7 | 163:14 213:14 |
| 231:17 236:1 | 73:18 74:7 112:8 | finds 346:19 | five 106:8 142:14 | 271:20 286:12 |
| 237:2 243:6 245:5 | 112:11,15 114:16 | fine 128:19 133:17 | 151:3 152:10 | 306:8,11 309:10 |
| 245:17 246:1,7 | 115:7 116:5,7 | 134:17 136:7,8 | 195:16 203:5 | follows 46:19 152:9 |
| 247:7 248:20 | 117:13,13,20 | 156:8 241:6 254:6 | 204:15 242:17 | 180:7 263:20,22 |
| 250:7 251:2 | 118:16,21 338:11 | 254:11 354:2 | 257:16 291:7 | 340:13 |
| 255:15,20 257:15 | fiddling 162:12 | 366:15 | 300:14 374:8 | follow-up 369:2 |
| 258:2 259:7 263:3 | field 25:15 41:7 | finer 249:8 | 391:8 | food 3:24 24:2 |
| 264:6,9 265:4,10 | 82:17 100:13 | finish 185:19 186:2 | fix 77:17 149:19,20 | 43:19 48:21 49:21 |
| 265:21 268:9 | 101:8 243:16 | 389:9 | flagging 130:10 | 50:20 51:8,9,10 |
| 270:13 292:9 | 244:5 278:15 | finished 70:11 | Flamm 195:2 | 51:11 62:1 69:21 |
| 310:18 340:2,6 | 299:6 301:9 | 93:17 172:3,6,8 | flat 279:9 | 70:1,17 72:2 76:6 |
| 342:13 343:14,18 | fields 318:10 | 172:14,16 173:2 | Flavor 157:12 | 79:6 80:2 89:14 |
| 347:16 348:19 | FIFRA 206:15 | 173:10 | flavors 97:11 | 92:3,6 95:2,11,14 |
| 350:4 353:4 355:7 | Fifteen 117:9 | fire 195:13 272:1,5 | 177:15 | 120:12 142:18 |
| 357:16 365:22 | figure 58:15 74:18 | 272:8 278:12 | flesh 266:17 | 145:10,16,17 |
| 366:10,16 367:12 | 83:8 107:5 136:13 | 298:21 321:9 | flexibility 29:21 | 155:16,16 159:15 |
| 381:15 382:2,4 | 164:9 169:3 262:8 | 322:8 325:6 341:7 | 256:4 | 159:17 171:19 |
| 383:17 384:13,19 | 266:12 281:16 | 344:3,10 345:18 | flexible 313:10 | 194:22 196:1 |
| 385:5,15,20 386:1 | 282:13 | 347:6,8 353:14 | flip 291:20 319:11 | 204:21 218:6 |
| 386:16,21 387:2,9 | figured 315:2 | 358:6 366:5 | floor 125:15,20 | 219:6,7 221:18 |
| 388:9,15,18 390:2 | fill 105:1 | 384:11 386:7 | 132:21 236:6 | 222:1 223:5 226:1 |
| feline 219:15 | filled 321:2 | firm 128:8 286:1 | 255:14 353:7 | 264:4 308:9 |
| fell 379:21 | filling 89:4 | first 5:8 7:8 8:7 | 384:18 | 316:10 317:21 |
| felt 13:4,9 15:11 | final 63:1 138:17 | 9:15 18:3 23:16 | flour 179:4 | 335:4 351:2,6,19 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| foods 28:12 46:7,11 47:19 48:3 49:5,9 51:13,17 52:2,5,8 52:21 54:6 59:15 70:9 71:6 72:15 73:19 75:19 79:16 95:10 96:5 97:4 97:15 142:1,3 170:14,17 181:13 195:21 206:9 219:6 220:3 221:4 221:6 227:12 257:12,19 258:3 344:18 361:20 384:8 | formulation 137:17 146:22 172:1 181:6 182:16 formulations 177:1 209:4 forth 84:21 220:20 266:7 273:15 274:15,15,16 288:5,11 289:4 290:11 291:8 314:15 380:15 fortunate 327:5 forum 190:10,17 forward 9:5 33:14 64:6 84:5,16,17 103:7 158:6 197:13 231:13 262:10 271:4,10 271:14 277:21 288:7 289:5,10 308:16 320:3 335:21 337:12 340:22 357:13 364:12 368:6 369:17 375:3 376:5 382:21 386:5 391:19 Foster 1:20 3:6 7:14,15 9:1,9 11:3 12:11 14:20 16:20 27:21 31:17 32:1 32:22 34:5 35:1,9 35:11 54:12,15 55:3,9,14 56:3,9 56:17 57:13,18 58:7,10,19 59:1,4 106:17 107:4,17 108:2,4,14,22 110:2,12,17,20 111:3,13 112:2,7 112:14 113:13 114:1,14,19 115:6 115:12 116:4,18 117:11,16 118:6 119:6,16 121:3,19 122:4 123:1,4,10 124:6,10,19 125:8 | 125:17 126:1 138:11 139:3 144:20 145:2,4,7 145:11,13 156:14 186:1,7 202:20 225:9 227:1 228:10 237:5 238:2 245:8 246:9 246:21 247:10,21 248:5,18 249:2 250:10 252:1,14 255:1 268:12 326:18 328:14 330:10 339:11 343:3 353:19 372:19 381:19 389:12 Foster's 369:13 found 9:11 33:8 49:7 53:14 61:16 127:21 253:6 257:6 294:20 four 7:16,21 106:15 108:16 203:5 204:15,17 215:4 249:19 257:16 348:18 373:5 374:7 four-year 215:5 FRAC 241:19 244:16 Frakes 3:9 36:2 41:18,20,21 45:11 frames 33:10 Francis 1:24 5:10 5:13,20 111:1 204:11 217:8 228:1 239:1 241:4 frank 283:10 frankly 283:9 301:22 323:5 324:5 fray 273:12 freaked 284:8 free 191:5 freezing 336:22 frenzy 321:2 | frequently 60:21 67:4,18 friendly 126:20 198:21 267:21 268:4 342:3 friends 5:11 325:11 330:7 front 46:17 68:11 121:20 126:5 256:19 290:9 380:5 fronts 289:15 337:14 frost-protecting 336:18 fruit 38:9 40:10 85:3 95:8 99:17 177:3 195:4 279:16,18 287:18 288:18 289:1 303:4 309:21 320:13,15 326:7 351:5,9,17 353:2 358:3 fruits 47:3 83:15 fruit's 352:9 full 32:11 47:19 85:6 102:13 151:18 211:4 220:2 304:13 346:9 354:12 fully 94:3 198:12 270:1 360:12 364:7 FULWIDER 1:21 110:4 111:15 114:3 115:14 116:20 121:5 122:11 123:16 202:22 225:7 227:3,17 228:12 237:7 245:10 247:12 250:12 268:14 296:4 339:15 343:5 389:14 fumigant 53:5,8 | fumigants 53:3 74:1 fumigate 53:7 function 44:17 65:14 159:16 functional 139:6,19 143:7 160:1 354:18 fundamental 84:3 fundamentally 10:11 funded 375:22 fungal 243:12,14 244:5 fungi 232:8,19 233:19 239:18 240:7 fungicidal 241:21 fungicide 229:13 239:4,9,22 240:1 240:3,20 241:8 243:11,12,21 fungicides 234:8 242:9 243:15,22 fungistatic 232:5 239:22 fungus 240:2 funny 318:5 funny-tasting 57:20 further 7:13 102:14 104:14 108:5 109:9 110:21 111:4 112:15 114:20 117:17 123:11 124:21 138:6 150:20 181:2 201:15 211:8 224:11 236:13 243:5 244:17,18 246:21 248:6 252:22 262:1,22 266:21 268:5 282:10,14 283:7 292:3 337:22 338:22 342:21 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 362:8 377:7 furthering 391:19 future 22:8 23:15 27:10,16 34:16 108:11 126:17 128:1 130:2 167:2 190:6 192:13 330:13 378:15 | 56:11 genuine 327:20 germane 10:17 getting 15:7 32:6 57:11 157:11 262:21 266:20 267:16 278:9,14 278:16 281:8 283:4 292:12 294:22 299:14 304:6 334:14,16 358:16 388:10 giant 222:17 gibberellic 37:9,12 37:14,18 38:2,5 38:11 372:19 gimmicky 48:21 give 5:10 19:8 65:16,20 66:17 169:14 189:3 193:21 201:2 223:15 283:19 288:12 290:11 294:18 304:21 310:22 326:8 350:1 360:3 378:8 387:22 389:6 392:20 given 6:9 40:15 76:21 225:16 332:6 357:2,14 373:15 giving 40:2,12 98:13 129:8 glad 219:16 270:1 292:17 326:22 327:14 glancing 221:8 global 70:20 316:8 GlobalGAP 351:3 351:4 352:2 357:22 glucose 62:10 glycerin 373:2 glycol 61:9 GMO 74:2,4,5 77:8 118:17 119:13 | 370:14 374:15 GMOs 52:21 70:2 118:12 GMO's 371:22 372:1 go 8:3 12:14 22:22 23:10 28:6 40:13 40:17 41:6 49:15 55:20 63:7 64:6 83:7 84:21 96:15 96:16 101:18 104:19 106:13 109:3 121:21 131:17 132:8 151:2 154:21 157:3 158:19 164:2 171:2 188:22 189:11 204:12 208:7 209:9 216:17 218:7 219:16 220:11 224:15 230:7 236:3,4 238:9,19 239:22 242:5 246:14 260:17 262:10,20 266:6 270:19 272:16 273:7,10 273:14 274:8,9,14 274:14,16,17 275:3 279:20 282:6 284:3,3,4 288:7,11 289:5 290:11 297:4,17 297:19 300:19 305:12 315:12 317:19 318:6 338:8 339:7,12 340:11 347:17 348:13 359:17 361:14 367:13,14 367:19 373:10 374:16 388:4 390:17 391:11 goal 39:12 96:4 286:17 God 263:16 293:4 | goes 36:8,17 47:5 145:19,20 146:9 149:2 152:19 188:14 192:9 214:14 216:16 270:3,9 276:12 308:13 318:19 328:10 353:10 367:5 386:15 going 5:3 7:7 9:2 10:15 18:1,10 19:8,10 22:9 23:10 24:11,12,12 24:13,17 26:14 28:13 29:5,21 30:15 31:1 32:15 35:7 36:18,19 64:15 68:16 74:17 77:21 79:16 80:7 85:4 86:6,16 106:12 119:20 125:6 126:10,18 128:3,8 129:6 130:1,11,15 131:5 133:10 150:3,18 153:15 155:11,19 157:6 159:9,21 160:6 161:1,18,18 162:13 163:7 168:5 177:6 195:22 199:3 204:3,14,20 210:4 217:4,9 218:4 219:14 234:20 235:3 240:15 244:12,12 246:11 253:10,22 254:1 261:2 262:9 265:14,14 266:8 266:14 267:12 269:9,9 270:14,22 271:3 273:6,17 275:3 277:1,21 279:21,22 280:1 281:12 285:16,18 286:1 288:12 290:11,15 293:7 | 293:19 297:6 299:5 301:1,3,5,6 302:14 303:4,7 305:8 308:16 310:16 312:15,16 312:16 313:1 315:12 324:16 328:6 330:20,21 331:2 332:9 335:1 336:4 337:13 338:8,9,10,15,17 338:19 347:2 350:13 351:15,20 352:8,9,11,11,21 353:3 356:13 357:6 358:20 359:17 363:12,19 366:21 368:13 374:2,12 376:2 377:17 380:6 384:16,16 389:6 Goldie 3:11 50:8 59:7,10 62:18 64:11 196:12,20 good 7:6 37:1 39:19 41:5,19 92:2 94:22 98:7 101:14 101:20 103:11 115:8 131:1 150:2 165:6,6 183:9 190:17 192:11 204:11,13 213:21 229:10 238:15 243:1 268:7 269:2 269:2,3 306:22 314:1 315:20 318:1 328:1 329:8 330:6 376:13 382:16 386:4 388:7 391:13 goods 316:16 Google 240:1 gotten 351:21 govern 137:22 governing 93:6 government 284:4 289:3 354:16 |
| G | | | | |
| gamble 87:11 game 26:16 gas 53:9 206:19 gather 212:14 278:22 gathered 371:7 gauge 216:3 gauging 168:14 Gautami 191:21 gearing 351:18 gellan 373:6 general 13:2 15:11 19:8,16 31:10 32:4 51:15 120:8 120:14 179:15 232:15 244:11 261:16 generalized 232:7 232:18 generally 18:20 95:21 210:9 328:18 355:19 367:6 generate 175:2 generated 174:18 generating 266:7 generation 319:15 319:16 genetic 49:17,18,21 53:12,20 55:9,20 119:19 350:19 genetically 15:6 48:9,16 53:17 54:21 56:2 62:11 73:8,11 74:16 75:1 genetic-engineered | | | | |

| | | | | |
|-----------------------------------------------|---------------------------------------------|------------------------------------------------|----------------------------------------------|----------------------------------------------|
| government-man... 356:7 | 225:16 243:12,13 243:15,22 256:8 | 347:22 349:8,13 351:2,21 352:4,18 | guiding 283:3 | 11:18,21 12:3 |
| government/corp... 309:4 | 262:13 275:4 277:7,14 286:14 | 354:12 356:18,19 360:14 386:6 | guinea 49:17 | 13:15 14:6,13 |
| governs 210:5 | 288:7,18 295:13 | growers/producers 83:12 | gum 373:6,6 | 16:13 22:7 23:9 |
| go-around 292:11 | 328:4 377:22 | growing 47:10 96:1 96:5 194:7 283:20 | Gummy 242:20 | 35:21 37:21 38:1 |
| graciously 191:14 | 382:14 393:3 | 333:3 360:13 | guys 40:18 129:9 158:2 288:3 290:5 | 38:10 42:3,18 |
| Granatstein 291:3 334:9 335:5 | grouped 210:16 211:18 213:22 | grown 289:14 | 292:6 313:11 319:6,8 365:12 | 44:9,12,18 46:9 |
| grandchildren 50:20 | grouping 208:4 | growth 60:18 155:10 316:6 | Gwendolyn 88:7 | 47:17 88:5 89:21 |
| grandmother 192:13 | groupings 211:7 215:5 256:11 | 346:9 | <hr/> H <hr/> | 94:2,15 95:3 |
| grant 288:21 294:19 | groups 19:6 46:4 85:16 86:4 167:7 | guess 5:20 7:22 18:5 35:15 73:2 | H 382:11 | 98:12 106:3,13 |
| grapple 64:17 65:17,18 | 167:19 209:15 211:5 212:20 | 76:21 107:5 114:22 119:4 | Hain 88:3 95:2 | 119:9 121:21 |
| grappled 313:18 | 213:20 214:16 216:13 256:9 | 135:18 200:16 204:12 212:7 | hair 169:3 | 164:22 165:12 |
| GRAS 137:19 | 261:4 313:20 323:19 338:2 | 216:9,16 219:1 230:6 232:9,14 | half 240:6,8 319:1 391:5 | 252:12 329:6 |
| gravity 5:20 | group(s) 171:19 | 249:18 251:3,15 262:12 270:10 | half-life 240:4 | 371:21 372:18 |
| gray 304:8 322:19 | grow 66:2 95:8 119:3 193:16 | 274:11 279:14 284:5 292:14 | half-truths 321:3 | hands 262:5 299:15 |
| great 11:5 40:22 63:4 68:18 103:11 | 194:6 283:18 289:20 308:6 | 301:20 333:20 342:1,2 347:19 | hallways 323:3 | hand-applied 100:21 |
| 103:13 126:3 141:21 168:15 | 314:5,6 323:19 | 349:11 350:6 354:20 368:12 | hand 163:10 188:8 191:22 331:12 | handing 168:13 317:18 |
| 190:8,9 203:4 220:5 293:17 | grower 49:11 194:2 194:10,15,18 | 384:13 386:13 | 347:19 353:2 | haphazard 23:12 149:11,12 |
| 333:6 349:14 | 195:4 234:20 241:22 272:3 | guidance 22:6 25:6 26:8 102:14 104:2 | handing 158:9 | haphazardness 149:20 |
| greater 43:18 234:7 | 309:9,19 338:18 351:14 352:12,12 | 104:14 105:14,15 105:18 151:21 | handle 174:5 213:21 352:5 | happen 96:19 151:22 166:20 |
| greatest 89:16 | growers 38:8 39:6 40:10,16 84:10 | 165:10,16 170:2 171:4 176:20 | 359:4 | 246:16 299:2 |
| green 36:6 192:7 | 85:4 87:2 99:22 101:6 193:18,20 | 177:10 178:11 181:16 182:21 | handled 279:3 | 324:16 332:8,9 |
| greenhouse 53:9 | 235:2 248:10 275:7 289:6 290:9 | 186:17 201:2 261:18 346:22 | handler 144:6,8 145:20,21 146:9 | 381:4 391:8 |
| grew 69:17 95:5 311:10 | 291:1,9 293:8,10 293:13,20 307:8 | 348:2,16 353:12 358:11,13,15 | 147:7 152:12 153:1,3,9,12 | happened 76:3,17 86:17 288:16 |
| ground 333:5 338:9 349:19 | 308:16,20 309:6 309:21 319:8 | 369:16 371:20 383:10 | 154:21 155:21 156:2 174:3,5 | 309:8 312:7 339:6 |
| 354:18 | 323:13,14,16 324:3 325:4 326:4 | guide 104:14 | 180:4 | 379:12 |
| group 3:22 39:2,10 42:5 83:19 84:21 | 326:8,11 327:22 334:12 336:16 | guidelines 209:14 | handlers 25:7 60:17 144:15,16 | happening 76:2 156:21 157:10 |
| 85:10 86:20 88:3 92:5 95:2 167:11 | 344:15 346:15 | | 144:17 145:1,6 153:19 155:1 | 316:20 364:1 |
| 167:13 203:7 205:5,7,21 206:1 | | | 170:2 174:9 176:20 178:19 | happens 243:20 355:6 |
| 209:6,22 210:15 212:19 213:8,16 | | | 181:2 182:14 334:18 | happy 103:4 293:14 295:7 |
| 214:6,11,22 | | | handler's 337:21 | 331:3 |
| | | | handler/processor 175:6 | hard 27:22 88:20 103:9 203:8 216:2 |
| | | | handling 3:4,7 7:7 8:12,14,16 9:9 | 258:11 281:20 |
| | | | | 284:7 325:12 |
| | | | | 387:22 |
| | | | | harder 392:13 |
| | | | | harder-to-control 235:5 |

| | | | | |
|--------------------------|---------------------------|---------------------------|----------------------------|---------------------------|
| hardest 322:20 | 190:4 269:20 | 191:22 193:2 | holistic 307:13 | hydroxide 373:1 |
| hardship 118:15 | 278:17 291:2,2 | 266:11 276:1 | home 317:19 330:1 | hyphen 254:5 |
| 275:1,3 | 330:11 333:22 | 289:6 312:12 | 362:14 | hypobromous 44:4 |
| hardships 332:16 | 334:20 348:15 | 314:20 323:19 | homeland 6:4 | 44:16 |
| hard-dated 324:15 | heard 35:7 60:21 | 348:1 352:16 | homesick 204:11 | |
| hard-working | 61:13 65:9 66:14 | 357:7 358:6,7 | honest 72:1 283:10 | I |
| 322:14 | 67:1,19,22 69:13 | helpful 158:5 | honestly 283:9 | IBA 228:21 245:18 |
| harm 319:19 | 82:7 107:13 113:4 | 197:22 256:18 | 301:22 306:16 | 246:12 |
| harmful 44:14 | 118:20 124:18 | 263:5 330:12 | 364:21 | idea 35:15 313:1 |
| 50:13 72:14 79:19 | 135:20 161:21 | 390:11 | honey 284:1 | ideal 323:17 |
| 100:9 | 176:17 207:18 | helping 291:12 | honeybees 46:17 | identified 12:20 |
| Harold 1:17 39:22 | 219:3 241:18 | helps 162:5 186:10 | 46:21 | 13:2 53:15 172:18 |
| 83:3 108:4 122:4 | 246:13 253:1 | 276:5 | hope 7:20 35:5 48:4 | 210:16 214:5,16 |
| 130:14 200:15 | 255:13,21 271:2 | henceforth 16:3 | 55:14 74:3 96:2 | 243:10 257:7 |
| 202:8 229:4 | 277:8 288:3 | herbal 375:15 | 181:10 200:14 | 261:17 312:17 |
| 237:13 245:1 | 292:18 293:8 | herbicides 97:20 | 265:22 266:8,8 | identifies 137:4 |
| 248:5 267:20 | 295:17 296:5,6,11 | Herman 3:13 92:1 | 269:20 270:3 | identify 158:6 |
| 270:14,20 310:19 | 308:19 320:9 | 94:22 95:1 | 274:19 278:8 | 209:17 210:14 |
| 350:4 357:5 361:7 | 324:3,4 329:7 | hexane 61:9 76:18 | 286:17 287:9 | 259:21 |
| Harold's 357:19 | 330:3 331:22 | hey 41:2 129:9 | 359:9 390:11 | identifying 282:14 |
| harsher 234:16 | 349:12 353:21 | 363:2 | hopeful 371:13 | identities 186:21 |
| Harvard 69:8 | hearing 13:20 28:9 | Hi 69:4 83:4,5 | 372:5 | identity 178:4 |
| harvest 291:6,11 | 56:16 102:5 | high 131:11 243:4 | hopefully 30:19 | IED 359:2 |
| harvested 320:15 | 109:11 111:5 | 300:16 317:20 | 89:8 192:13 | ignorance 154:9 |
| 345:7,7 346:13 | 134:5 164:13 | 340:20 341:4 | 382:16 | 163:7 317:6 |
| harvesting 37:10 | 203:12 226:10 | 370:3 | hoping 107:18 | ignoring 47:22 |
| hazard 101:5 | 227:20 244:20 | highlighted 214:10 | hot 43:11 | II 58:3 |
| head 137:2 218:12 | 250:2 376:5 | highlighting 130:2 | hottest 278:1 | illustrates 132:5 |
| 351:19 | hears 324:8 | highlights 209:9 | hour 203:9,11 | images 6:22 |
| headed 9:3 17:19 | heart 68:18 222:15 | highly 69:16 | hours 66:20 69:14 | imagine 109:5 |
| heading 127:6,15 | 286:5 301:22 | 195:22 | 77:13 88:21 | 201:5 373:14 |
| 138:21 | 306:15 334:2 | hill 98:9 | 156:17,20 349:16 | 377:17 |
| health 43:8,14 | heartfelt 299:21 | Hilton 1:12 | household 311:11 | imagines 365:4 |
| 44:14,21 49:2 | 327:21 | hinders 298:5 | huge 285:2 | immediate 312:12 |
| 51:7,10 79:19 | hearts 83:13 | histidine 223:1 | huh 204:12 | immediately |
| 85:20 192:14 | 308:15 | 224:4 225:21 | human 6:18 43:7 | 288:17 |
| 195:5 240:21 | heart's 96:12 | historical 312:4 | 43:14 44:14,21 | impact 10:4 13:3 |
| 275:15 303:9 | heat 53:10 | historically 76:15 | 50:16 79:19 193:7 | 15:4 57:5,12 |
| 316:10 322:2,6,11 | heed 25:9 | 93:19 315:16 | 195:5 240:21 | 134:21 135:17 |
| healthier 195:1 | held 39:1,3 104:8 | history 50:16 | 275:14 322:11 | 182:2 198:18 |
| healthy 52:1 | 144:7 145:17 | 248:21 313:15 | humans 13:3 42:6 | 278:7 287:19 |
| hear 7:21 10:21 | 148:4 271:12 | hives 47:2 | humbled 323:1 | 334:18 |
| 11:6 28:5 35:17 | Helens 89:3 | hoc 370:14 374:15 | humidity 243:4 | impacted 304:16 |
| 55:8 57:13 66:14 | Hell 338:10 | hold 7:22 190:4 | hurry 385:22 | 305:15 |
| 68:8,18,19 101:17 | Hello 41:20 50:9 | 328:20 372:21 | hurt 270:8 293:4 | impacts 44:6,8 |
| 112:19 130:12 | 88:1 152:9 | holes 311:21 312:1 | hydrogen 43:11 | 322:14 |
| 131:20 142:5 | help 140:3 189:6 | 326:20 | hydrosols 177:14 | imperative 66:13 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| imperfect 328:17 332:8 | inclined 52:10 | increasingly 66:8 | ineffective 375:17 | ingenuity 298:19 |
| implement 20:19 21:19 151:20 212:16 330:22 347:4 353:12 361:3 | include 35:18 37:12 38:2,11,20 143:3,11 161:20 171:20 177:1 179:4 190:13,13 209:20 211:20 212:2 219:4 249:5 306:7 | incredible 66:8 | inert 64:19 205:19 206:13,17,18,19 207:2,4 208:1,11 209:3,18 210:7,11 210:13,16 211:11 213:12 256:6 260:4 261:13 | ingredient 10:22 12:13 24:5 54:16 55:17 60:6,13,14 62:1 64:19 73:12 78:9 79:10,11,13 80:12 88:15 89:4 91:6,7 93:5,5 94:14 96:11 138:13,14 142:18 142:19 143:18,19 144:12,12 152:19 152:21 160:3 164:17 166:18 175:15 177:1,17 177:19 179:1,3 182:4,19 183:6 185:12 187:19 198:4 199:15,18 200:5 210:9,10 213:10,13 251:10 257:3 317:9 |
| implementation 215:17 376:1 | included 43:6 141:3 162:11 164:5 210:7 214:1 215:9 225:18 256:2 | indicate 210:12 340:20 346:6 | inerts 3:22 98:21 167:4,18 203:7 205:5,6 206:7,11 206:12,21,22 207:3,6,13,14,14 207:19 208:6,14 208:18 209:6,13 209:20,22 210:4 210:20,21 211:4 211:17,21 212:11 212:20 213:1,8,15 215:5,12 216:14 382:13,13 | ingredients 3:26 7:19 8:1 17:18 18:2,9,13 21:3,9 22:18,21 23:2 25:13,14,18 26:19 26:20 27:1 28:10 28:14,17 30:14 31:8,15 32:7 34:1 46:8 51:17 52:17 54:18 59:14,18,22 59:22 60:3 61:6 61:18,21 62:13,14 62:21 64:22 65:3 70:8,9,10,10,12 71:10,17,17,18 72:3,3,5,14,15,15 75:5,9,14 76:5,16 76:19 77:11 78:5 78:10,10,14,21 80:16 81:11,14 82:10,11 88:6,13 89:10,12,17 90:1 90:9,14,15,17,22 91:3 92:12,13,19 93:7,10,14,16,19 |
| implemented 272:4 346:19 357:19 370:22 | includes 22:2 143:9 207:4 390:21 | indicated 65:19 306:2 | inevitable 327:16 | |
| implementing 365:7 369:16 | including 43:9 48:13 70:9 78:9 78:10 148:8,11 181:12 209:15 211:17 230:15 349:4 | indicates 206:9 | infection 242:8,8 242:11 | |
| implements 91:14 | inclusion 43:1 56:11 92:15,18 93:3 271:7 | indications 43:14 | inferior 221:21 | |
| implication 330:6 | inclusive 140:11 141:1 151:10 | indisputably 59:18 | influence 68:15 | |
| implied 253:14 | income 286:22 | individual 66:21 74:13 78:19 166:21,21 167:7 167:14 168:2,2 185:1 213:12,16 214:11 215:1 261:10,21 | inform 205:14 209:21 | |
| important 43:3 46:6 47:13 65:15 67:10 68:10 70:21 72:12 87:8,10,18 126:8 152:13 158:4 179:7 182:22 186:16 188:8 193:20 217:5 266:6 304:12 316:7 318:3 319:5 321:22 322:8 330:2 356:16 369:7 392:12 | incompatible 54:3 233:8 | individually 20:14 185:4 259:11 378:20 | information 9:17 10:9 22:3 26:10 29:6 37:21,22 43:4,6 44:5,9 172:19 174:6 183:9 187:17,18 187:22 188:19 189:5 211:14 212:14 244:15 249:11 304:6 311:22 312:6 317:8 320:17 335:5,14 349:2 371:1,3,7,13,14 371:15 372:10 377:19 391:10 | |
| importantly 69:20 84:15 90:7 | inconsistencies 157:7 | indole-3 247:22 | informing 347:10 | |
| impossible 9:20 94:12 | inconsistent 23:13 157:5 | indole-3-butyric 3:25 246:10,18 | | |
| impractical 94:12 | incorporate 24:13 138:2 | industry 25:12,21 30:9 38:15,21 42:8 54:7 60:19 66:10 67:1,12 68:12 70:19 71:22 72:9 78:9 84:8 95:22 96:5 97:16 99:17 106:1 177:12 178:1 279:16 288:4,6 296:22 306:9,16 314:5 316:13 335:11 336:14 360:8 376:8 | | |
| impressed 299:19 | incorporated 22:6 47:12 | industry's 61:2 | | |
| improve 232:13 | incorporating 22:14 | | | |
| inaccuracies 321:3 | increase 14:22 51:6 90:6 184:15 272:7 335:22 390:21 391:4 | | | |
| inaccurate 320:16 | increased 97:19 341:5 391:4 | | | |
| inadequately 65:1 | increasing 96:4 | | | |
| inappropriate 161:4 348:6 | | | | |
| incidental 90:3 93:18 96:17 136:18 137:19 140:11 | | | | |

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 94:5 95:4 96:7,9 97:8,10 98:11 99:2 101:4,8 102:7,17 104:18 104:22 105:10,11 108:20 124:13 126:11 127:3,21 129:7,20 136:14 136:19,21,21,22 137:1,11,14,16,20 138:5 140:8,9,14 140:14,19,20,21 140:22 141:7,7,7 142:15,22 143:12 144:13 145:18 146:15 148:3,6,12 148:14 150:14 153:6,18 155:1,8 155:15 156:15,18 159:14,18 160:13 162:10,15,20 165:4,4,4,7,8,8 166:2,8,21 167:7 169:12,21 170:7 171:14,15,19,20 172:1,6,9,13,15 172:17 173:1,4,6 173:7,9,12 177:2 178:19,21 179:4 179:21,22 180:10 180:11,12,15,20 181:22 182:1,7,13 183:4 184:4,5,22 185:2,14 186:18 187:6 188:1,11,14 188:15 190:19 199:13 200:8,12 200:12 205:19 206:13 207:2,4 208:1,11 209:4 210:7,11,11,13,17 211:12 222:7 229:1 251:7 252:10,11 253:6 253:16 254:4 255:5,7 256:1,6 257:5,10,17 260:3 | 260:5 261:13 263:10,20 349:15 379:4 inhibition 232:15 233:13 inhibits 240:2 initially 100:19 initiate 212:21 213:7 initiation 379:13 Initiative 369:17 inner 360:6 innovative 280:3 innuendo 330:7 input 29:15 91:5,17 94:9 101:12 147:5 164:17 166:16 174:14 184:17 258:18 361:5 362:8 368:6 371:22 372:1 375:6 382:18 inputs 43:18 64:18 73:9 74:22 98:12 147:11,21 148:2,5 261:12 382:19 insect/pest 99:10 inseparable 6:22 insert 172:15 173:9 342:9 inserting 172:8 insignificant 93:17 139:9,19 158:16 159:6,16 160:9 insoluble 12:18 inspection 88:19 329:12 inspections 188:22 inspector 184:16 inspectors 88:20 instance 167:3 187:21 260:4 261:11 367:4 instances 80:5 307:15 Institute 41:22 45:19 51:1 69:6 | 192:22 221:18 institutional 328:1 Institutions 294:14 294:14 instruction 201:15 integrated 272:4 integrates 347:5 353:13 integration 99:11 integrity 46:5 54:5 66:1 270:5 286:6 290:6,7,18 320:22 349:18 intellectual 92:5 intend 109:6 intended 139:15 149:19 215:10 238:13 intends 28:14,16 127:17 211:19 253:5 379:11 intent 12:14 14:21 32:1 67:14 102:11 128:2 140:12 142:5 156:4 176:12 195:12 211:11 212:9,13 213:6,11 215:4 256:15 259:3,13 260:14 266:4 319:20 329:2 361:9 364:6 intention 26:13,19 211:6 intentional 67:21 intentionally 338:8 interest 46:4 108:8 130:7 219:21 220:2 249:21 269:18 271:8 275:19 298:13 314:9 334:3 336:12,13 373:16 380:9,11 390:9 interested 69:18 72:21 328:15 interesting 233:3 | 241:3 243:7,8 interests 108:7 295:17 305:11 interim 85:9 107:9 208:16 intermittent 322:3 internal 32:4,19 international 21:18 391:3,6 internet 320:18 interpretations 23:13 interpreted 259:12 interrupt 139:5 interrupted 267:12 267:16 intricate 83:9 introduce 8:5 9:4 15:22 279:12 340:7 343:20 384:14,20 386:1 introduced 280:3 388:18 introducing 233:5 introduction 35:13 218:15 inventories 90:8 inverse 158:20 invest 316:17 invested 336:12,13 investigate 366:3 384:5 386:4 investment 316:22 317:13 319:7 investors 316:14,16 invitation 41:8 invoke 364:1 384:6 invoked 355:11,18 involved 76:22 95:9 119:19 281:21 303:1 351:2 355:1 in-depth 31:21 91:8 IPM 233:4 irrational 69:12 86:9 | irrelevant 69:13 Island 38:18 isolates 243:13 isoleucine 223:1 224:4 225:21 issue 18:7 25:6 30:2 64:19 65:5 73:2 75:9 77:8 82:21 83:17 84:16 85:14 126:9 152:14 166:7 201:19,22 207:17 221:12 222:2 230:15 231:16 233:20 239:3 271:11 274:20,22 275:1 280:12 289:8 290:8,13 293:22 294:8 299:20 304:8 308:2 313:16 314:21 323:8,22 324:9,11 325:9 338:14 351:15 352:3 353:11 358:12,15 374:20 376:12 377:21 386:4 388:11 392:2 issued 209:2 issues 27:3 41:6 63:5,21 64:16 66:15 76:10 77:6 118:4,9 206:7 210:3 214:9 303:3 303:10 304:7 307:17 322:19 376:9 382:17 383:2 item 17:17 112:8 118:7 120:17 124:11 141:17 169:9 175:13 377:12 items 9:4 21:13 113:3 132:7 159:15 177:14 373:5,8 379:5 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| item-by-item 261:18 | 116:16 169:7,18 191:9 196:8 197:4 221:14 343:1 368:17 | key 38:7 231:12 309:17 | 161:2,3 163:12 168:17 188:12,13 189:1 196:3 198:21 199:3 210:22 211:12 214:12 216:1 219:12 221:1 223:9 229:7,13 230:7 231:17,19 232:2,10,21 238:3 240:5,8 241:17 244:6 249:21 251:13 256:10 258:11 260:20 261:1,4,20 262:16 263:6 264:12 267:7 269:7,22 274:8,19 280:13 280:20 282:3,5 283:3,15,17,19 284:3,14,15 285:4 285:22 286:19,20 286:22 287:2,4,6 288:16,17,18 291:8,10 292:12 292:13 293:9,13 294:7 299:3,4,14 302:13 303:10,19 307:16 311:2,12 312:3,11,11 313:6 313:7,10,12,17 314:2,11,12 315:3 315:5,17,20 316:2 316:7,14,16 317:1 317:10 318:5,5 320:5 322:17,21 323:4,10,21 324:7 324:10,17,22 325:6,7,10 326:5 326:9,12 327:3 328:4,4,18 329:2 329:8 331:7 333:11 338:12 339:5 341:20 348:5 350:9,15 351:22 352:6,22 354:9 355:2,9 | 356:12,21 358:2 359:12 363:10,17 364:18 365:4 367:3 370:7 381:3 383:13 387:14,15 390:19 |
| iteration 249:4 | 221:14 343:1 368:17 | kick 266:14 365:15 kids 317:11 318:4 318:15 | 367:3 370:7 381:3 383:13 387:14,15 390:19 | |
| <hr/> J <hr/> | | killed 89:2 killing 46:20 kills 240:2 kind 8:5 11:4,12 13:22 15:21 33:5 57:10 87:17 120:17 138:18 151:21 168:13 183:9 187:16,21 201:11 229:7 233:18 241:12 242:21 252:2 264:15 280:20 298:2 300:19 302:1 328:6,7,18 328:22 330:3 349:21 352:7 354:2,5 389:7 | knowing 52:8 knowledge 47:20 91:8 211:14 known 16:4 47:11 74:15 102:7 129:19 210:1 230:21 249:18 252:11 289:14 knows 264:14,14 Kona 284:22 285:16 | |
| January 38:19 | John 1:20 3:6 8:6 11:13 14:1 18:1 31:21 35:14 54:11 72:22 106:16,21 107:3 121:2 125:14 138:10 156:13 169:1 191:22 238:1 245:17 246:2 247:3 250:22 251:22 311:20 349:16 369:13 381:12 386:15 389:10 | kind 8:5 11:4,12 13:22 15:21 33:5 57:10 87:17 120:17 138:18 151:21 168:13 183:9 187:16,21 201:11 229:7 233:18 241:12 242:21 252:2 264:15 280:20 298:2 300:19 302:1 328:6,7,18 328:22 330:3 349:21 352:7 354:2,5 389:7 | knows 264:14,14 Kona 284:22 285:16 | |
| Jay 1:20 31:19 64:9 72:19 103:18 113:19 128:16 136:11 142:8 144:2 152:10 155:12 163:22 184:1 197:20 198:8 199:22 206:1 216:22 220:5,11,22 222:12 228:20 230:6 231:16 233:11 239:8 240:12 243:5 251:1 258:1 263:2 265:3 268:8 270:10 292:6 326:19 336:9 340:5 358:20 361:6,9 367:20 381:14 | Johnson 288:16,20 joins 238:20 JOSEPH 1:19 judge 113:1 juice 177:3,3 196:3 July 8:8 jump 7:7 junction 352:2 June 11:16 justify 44:20 51:7 60:15 | kinds 63:21 67:20 187:14 know 29:11 40:11 41:5 44:19 46:8 49:14 55:4,15 56:19 57:21 58:20 61:5 62:3,6,8 63:17 64:15 65:8 65:11 68:2 73:3 74:3,17,21 75:3,4 75:14 76:18 77:2 77:13,18 78:17 79:15,15 83:11 118:9,15 119:2,9 120:15 125:7,14 127:3 129:6 131:12,19 136:1 136:16,18 137:20 138:11 139:22 142:10 147:2 154:8,9 155:5,9 155:14,18 156:6 156:10,12 157:8 158:10,11 160:6,7 | lab 279:9 label 24:5 43:17 49:3 51:14 54:5 58:17 60:21 72:9 139:21 143:18 155:16 174:3 181:18 185:15 222:9 232:3,4,7 239:7 243:9 321:1 labeled 171:16 176:7 182:5 184:7 199:18 200:10,12 345:11 labeling 72:4 79:1 101:2 184:4 185:6 185:11 186:4 198:5,18 210:6 labels 170:3 210:8 234:22 labor 83:15,15 labored 312:5 lack 43:12 178:14 231:18 lacking 142:8 lamenting 95:18 land 6:14,16,16 338:7 landfill 352:11 | |
| Jay's 152:9 153:10 153:16 188:16 384:4 | JOSEPH 1:19 judge 113:1 juice 177:3,3 196:3 July 8:8 jump 7:7 junction 352:2 June 11:16 justify 44:20 51:7 60:15 | kinds 63:21 67:20 187:14 know 29:11 40:11 41:5 44:19 46:8 49:14 55:4,15 56:19 57:21 58:20 61:5 62:3,6,8 63:17 64:15 65:8 65:11 68:2 73:3 74:3,17,21 75:3,4 75:14 76:18 77:2 77:13,18 78:17 79:15,15 83:11 118:9,15 119:2,9 120:15 125:7,14 127:3 129:6 131:12,19 136:1 136:16,18 137:20 138:11 139:22 142:10 147:2 154:8,9 155:5,9 155:14,18 156:6 156:10,12 157:8 158:10,11 160:6,7 | <hr/> L <hr/> | |
| Jean 1:22 5:22 7:3 110:20 112:14 114:20 115:9 123:10 132:2 162:6 169:13 188:3 191:10 198:6 339:7 353:4 373:1 388:19 | <hr/> K <hr/> | | | |
| Jennifer 1:23 224:14 297:20,21 370:15 372:14 | kale 292:22 keep 39:15 55:17 57:10 96:1 100:16 128:8 253:10 301:5 312:15 329:22 360:19,19 376:15 | | | |
| Jerry 235:8 | Keeping 50:20 Kelly 3:12 69:3 87:21 88:1,2 91:21 | | | |
| job 79:4 142:8 299:11 314:1 378:13 392:14 | Ken 288:16,20 Kentucky 38:4 39:18 | | | |
| Joe 3:19 9:6 11:9 106:22 107:6 | kept 26:20 381:2 Kerry 206:6 | | | |

| | | | | |
|----------------------------|----------------------------|----------------------------|---------------------------|-----------------------------|
| 358:4 | lawful 78:17 | 225:22 | Lisa 2:18 3:22 | 261:11,12 264:1 |
| Land-Grant | Lawrence 192:1 | level 25:15 82:16 | 205:8 216:22 | 266:5,7 308:10 |
| 294:13 | laws 72:4 79:1 92:6 | 159:16 280:21 | 217:10,21 218:7 | 327:17 345:16 |
| language 6:10 24:8 | lawyer 92:4 | 284:10 315:1,8 | 218:11 256:6 | 372:20 378:4 |
| 26:1,17 129:15 | lawyers 20:8,8 | 373:15 | 378:12 | 380:6 381:14 |
| 157:22 160:19,19 | laypeople 155:14 | leveling 68:8 | list 8:11,13 10:16 | 382:22 |
| 162:2,12 173:17 | lead 36:10 103:2 | levels 93:17 165:14 | 11:20 12:1 13:16 | listed 16:10 60:6 |
| 174:17,19 175:20 | 134:12 218:18 | 311:5 | 13:17 14:8,11 | 61:22 62:14 70:12 |
| 176:9 198:8,16 | 256:9 | level-headed 99:8 | 16:9,11 20:14 | 72:4 93:8 175:12 |
| 199:7 201:6 | leading 106:22 | leverage 187:18 | 22:7 37:8 42:7,10 | 182:17 206:22 |
| 219:13 251:14 | 270:16 369:13 | lids 100:6 | 45:7 48:11 51:3 | 225:15 234:22 |
| 254:19 263:2 | leads 373:8 | life 44:5 50:11,17 | 59:20 70:13,14 | 238:11 239:6,8,13 |
| 310:5 348:14 | learn 307:8 315:8 | 58:1 95:10 159:2 | 71:11,19 72:5 | 240:19 257:3 |
| 360:20 384:16 | learned 369:19 | 159:3 240:7,11,13 | 74:18 75:13 78:15 | 259:11 260:5,12 |
| 392:8 | learning 214:13 | 282:12 337:4,7 | 79:7 80:16,19,20 | 261:4 271:6 |
| lap 359:3 | leave 30:22 100:9 | 338:6 363:20,21 | 80:21,22 83:21 | listen 68:18 86:5 |
| large 9:16 60:20 | 131:14 132:4,9 | light 36:6,7,7 | 89:11,17 92:15,18 | listened 307:21 |
| 119:13 175:2 | 138:5 162:14 | 126:18 192:6,7 | 92:19,21,22 93:3 | listening 337:21 |
| 176:13 188:19 | 178:5 187:3 | 196:14 273:10 | 93:6,8 94:8 97:6 | listing 13:14 15:14 |
| 189:7 221:13 | 190:11 353:15 | lighten 89:8 | 98:22 99:2 100:19 | 17:10 75:1 92:21 |
| 336:3 | leaves 49:13 261:22 | lightly 87:16 | 100:20 104:8,8 | 105:9 110:13 |
| larger 166:7 278:7 | 303:7 | lignin 382:10 | 108:13 114:15 | 113:16 114:15,20 |
| 279:15 329:20 | leave-out 25:10 | likelihood 15:6 | 115:6 117:13 | 117:12,17 123:5 |
| lastly 27:7 307:10 | led 169:13 | 300:16 | 123:5,7 131:18 | 167:17 210:10 |
| late 26:16 235:7 | leeway 233:5 | likes 18:8 | 141:4 143:10 | 215:12,14 222:21 |
| Latin 38:16 | left 9:22 201:6,19 | limit 161:18,19 | 148:20 159:17 | 223:9 225:18 |
| Laughter 18:14 | 240:9 | limitation 356:21 | 163:15 164:6,13 | 227:9 230:16 |
| 36:14 37:6 41:9 | legal 20:6 47:22 | limitations 20:17 | 166:14,19,22 | 232:11 237:15 |
| 41:13 101:22 | 80:1 92:4 212:4 | 21:6 | 167:3,3,22 175:13 | 238:1 247:22 |
| 132:15 133:6 | 344:20 349:4 | limited 76:19,20 | 176:3,5 195:13 | 248:6 256:9 |
| 143:20 144:1 | 355:1 | 162:3 163:4 | 206:10 207:1,1,5 | 271:18 276:12,15 |
| 149:10 150:5 | Leifer 206:6 | 207:13 263:12,22 | 207:6,10,13,14,19 | 344:8 |
| 154:13 192:20 | length 43:10 | 377:18 | 207:21 208:3,14 | listings 129:18 |
| 196:17 201:4 | lengths 349:14 | limiting 266:3 | 208:16,19,22 | lists 62:1 99:4 |
| 204:7 205:12 | letter 37:20 | Lindsay 3:14 98:6 | 209:14,20 210:2 | 100:1 129:6 213:5 |
| 223:11 246:8 | letting 76:8 | 101:16,21 103:20 | 210:20,20,22 | 263:13,14 |
| 253:17 254:22 | let's 97:2 125:8,18 | 105:21 | 211:2,4,5,7 212:1 | literal 195:18 |
| 267:18 269:5 | 177:6 183:11 | line 209:15 219:13 | 215:12,13 221:8 | literally 6:13 161:7 |
| 274:3 292:8 | 205:4,6,11 251:15 | 238:20 295:16 | 222:21 225:19 | little 5:10 30:20 |
| 299:12 328:13 | 257:15 262:20 | 302:8 317:22 | 227:10 234:8 | 33:5 36:6 83:7,13 |
| 330:9 | 281:16 282:9,13 | 359:1 | 237:16 238:5,5,6 | 115:4 125:12 |
| law 60:1 61:3 71:22 | 287:12 291:12 | lined 312:1 | 238:8 244:1 | 129:5 136:15 |
| 72:6 75:18 78:18 | 305:1 339:12 | lines 139:8 354:9 | 247:22 249:5 | 137:2,18 157:5,8 |
| 92:10,15 93:5,11 | 357:13 364:3 | Lingerfelt 192:2 | 253:7 256:2,5,12 | 165:22 192:6 |
| 93:15 199:1 | 384:15 388:4 | linked 13:6 | 257:4,5,12,20 | 203:10 219:8 |
| 255:22 276:4 | 389:8 | liquid 172:18,18 | 258:4 259:12 | 224:15 225:13 |
| 362:17 | leucine 223:2 224:4 | 173:5,7 | 260:6,8,13,18 | 229:8 238:18,22 |

| | | | | |
|----------------------------|---------------------------|---------------------------|--------------------------|-------------------------|
| 241:18 246:2 | 207:19 213:9 | 297:5 344:14 | 225:20 | 349:7 |
| 259:4 264:16,20 | 240:10 295:1 | lost 132:8 340:10 | | management |
| 264:21 266:17 | 308:1 | lot 5:5 9:22 22:14 | M | 241:20 243:9,11 |
| 271:4,6,14 273:1 | long-term 347:7 | 23:19 24:20 27:22 | Mac 1:13,16 41:2 | 244:2 272:6 |
| 278:13 301:17 | look 28:21,22 68:6 | 29:21 62:4 64:16 | 108:14 169:8 | 329:14 |
| 311:19 331:9 | 72:5 74:4 75:17 | 69:13,15 72:10 | 191:6 218:17 | manager 88:3,9 |
| 333:9 338:13 | 97:2 103:6 120:14 | 85:14 106:4 129:7 | 230:19 235:12 | managing 95:11 |
| 341:16 349:6 | 129:9 131:6 | 190:14,15 203:4 | 246:1 248:7 251:2 | 272:8 |
| 352:5,10 359:8 | 140:13 152:3 | 210:21 243:3 | 267:4 270:13 | mandated 362:10 |
| 360:1 368:15 | 154:22 157:16,17 | 249:10 263:6,6 | 274:7 275:3 | 362:17 |
| 372:8 374:18 | 157:17 160:6 | 266:14 271:11 | 292:11 342:16 | mandates 43:18 |
| 378:19 379:6 | 167:16 177:7 | 273:2 274:20 | 368:18 372:8 | Mann 3:21 191:18 |
| 388:22 | 210:20,21 216:17 | 287:19,20 298:1 | 377:11 | 192:4,11,12,21 |
| live 297:3,11,14 | 219:14 234:4 | 303:10 312:13,19 | mad 316:14 321:4 | manner 103:3 |
| livelihood 352:14 | 262:9,18 269:4 | 315:18,21 317:12 | made-with 188:1 | 280:4 |
| livelihoods 83:22 | 300:5 303:14 | 318:2 323:11,13 | magnesium 175:14 | Manual 379:18 |
| 275:9 305:3 | 313:21 321:22 | 324:22 328:14,15 | 175:14 382:12 | 380:15 |
| 306:10 310:9 | 349:1 360:8 361:4 | 328:20 329:4 | magnitude 376:11 | manufacture 44:2 |
| 314:14 338:15 | 368:4,20 369:17 | 330:3 331:19 | main 21:9 119:1 | 97:15 330:22 |
| lives 287:20 297:3 | 372:6 378:14 | 332:7 333:4,22 | 142:18,21 156:14 | manufactured |
| livestock 164:21 | 379:5 391:19 | 335:1 336:16 | 156:20 157:10 | 51:13 |
| 165:2,5,11 167:10 | looked 67:6 165:13 | 348:8 349:2,2 | 231:12 289:19 | manufacturer |
| 207:8,11 214:4 | 220:21 222:13 | 352:10 353:22 | 369:1 | 42:10 53:18 79:9 |
| 215:15 260:6 | looking 31:14 35:3 | 354:22 360:6 | maintain 88:11 | 80:14 95:14 |
| 296:22 325:15 | 75:22 127:4 | 364:14 376:3 | 183:1 232:13 | 118:18 188:17 |
| 374:1,4 377:5 | 130:18 162:8 | 392:9 | maintained 207:20 | 189:2,15 220:14 |
| living 6:17 163:2 | 164:20 165:21 | lots 87:2 332:22 | major 30:2 77:16 | 221:16 |
| 338:7 | 167:18 174:13 | loud 288:3 291:3 | 81:19 375:22 | manufacturers |
| load 28:2 57:22 | 222:8 223:12 | Louisiana 294:21 | majority 15:5 | 78:20 91:7 92:17 |
| 350:2 379:1 | 232:2 234:3 | love 130:12 131:20 | 61:19 90:14 157:5 | 105:8 112:20 |
| loading 58:5 | 242:13,14 283:16 | 194:8 295:19 | 241:14 270:16 | 147:18 178:21 |
| lobbed 359:2 | 285:14 292:21 | 320:7 387:15 | 274:19 277:10 | 179:11 182:14 |
| lobbyist 42:1 45:20 | 302:7,21,22 305:3 | 392:2 | 280:12 | 188:10 209:17 |
| 51:1 193:1 | 340:17 347:13 | low-level 322:2 | Makam 191:21 | 221:5,18 289:9 |
| local 39:5 296:10 | 368:6 369:6 371:9 | Luis 3:8 35:22,22 | makers 99:7 | manufacturer's |
| 301:12 | 371:20 375:9,9,15 | 36:2 39:20,20 | making 23:13 | 222:5 |
| locations 346:10 | 376:1,5 384:4 | 40:1 41:4,15 | 33:10,14 37:17 | manufacturing |
| Logic 220:15 | looks 150:8 199:10 | lumps 235:10 | 40:19,20 82:2 | 15:2,4 17:3 91:9 |
| long 24:2 27:22 | 251:8 292:14 | lunch 7:9,10 8:2 | 85:1 91:11 155:4 | 231:11 |
| 63:10 65:2 68:16 | 354:19 368:17 | 106:5,6,19 168:6 | 185:16 195:19 | mapping 326:20 |
| 96:18 219:2 | 370:12 | 168:20 203:6 | 204:10 213:16 | MARAVELL 1:22 |
| 234:13 238:20 | lose 54:4 67:10 | 218:3 223:4 | 259:5 272:14 | 28:7 29:3 31:5 |
| 240:6 254:8 257:1 | 87:14,14,19 | 251:11 259:16 | 303:2 311:3 316:5 | 34:7,18,22 35:5 |
| 270:6 273:15 | 285:16 329:18 | lures 99:11 | 336:5 342:19 | 35:10 77:10,21 |
| 284:8 389:6 | 346:18 | Lynn 271:8 | 362:3 363:20 | 80:3 81:4,13,22 |
| longer 143:15,17 | losing 86:1 286:22 | lysine 221:10 | malady 46:20 | 82:20 110:7 |
| 159:1 179:17 | loss 243:19 244:5 | 222:22 224:3 | manage 270:15 | 111:18 114:6 |

| | | | | |
|---------------------------|----------------------------|--------------------------|--------------------------|-------------------------|
| 115:17 117:1 | Market's 52:3 | 329:8,20 333:12 | 315:16 341:21 | 322:17 327:7 |
| 121:8 122:14 | marsala 373:6 | 341:6 370:3 | 350:17,20 352:13 | 368:2,8 |
| 123:19 126:7 | Mary 3:21 191:17 | 373:12 374:9 | 357:9 363:12 | meets 65:21 80:1 |
| 127:11,13 128:5 | 191:18 192:3,4,12 | 377:9 | 365:16 387:16 | 146:10 147:1 |
| 128:10,19 129:3 | masse 46:21 | mating 99:18 | meaning 26:5 | 166:15 173:20 |
| 129:16 131:9 | master's 69:6 | matter 25:8 63:3 | 300:11 | 238:16 345:2 |
| 134:8,18 135:9,13 | material 9:21 10:7 | 63:18 67:15 70:10 | meaningful 327:12 | Melissa 2:16 |
| 135:19 136:6 | 10:16,21 12:12 | 106:10 201:9 | means 18:13 27:17 | 219:11 |
| 150:8 152:8,22 | 15:22 16:21 43:16 | 269:14 275:2 | 58:16 239:15 | member 5:16,17 |
| 153:15 154:6,12 | 44:20 48:18 55:10 | 328:9 354:17 | 281:12,14 351:5 | 6:3 7:15 9:1,8 |
| 154:14 160:12,22 | 56:11 74:12,15 | 393:6 | measure 338:16 | 11:3 14:20 16:20 |
| 161:13 162:21 | 77:5 79:10,18 | maximum 279:12 | measures 309:12 | 17:22 18:15 27:21 |
| 168:16 202:11 | 80:20 83:20 85:2 | ma'am 267:5 | meat 375:2 376:18 | 28:7,20 29:3 30:7 |
| 224:19 226:14 | 102:15 103:5 | McEVOY 2:12 | meat-based 220:17 | 31:5,12,17,20 |
| 228:15 237:10 | 107:12 113:7 | 33:3 34:11,20 | mechanics 99:2 | 32:1,3,13,17,22 |
| 245:13 247:15 | 146:17,19,21 | 89:6 132:18 133:7 | mechanism 30:10 | 34:5,7,18,22 35:1 |
| 250:15 253:21 | 154:1 195:8 | 134:17 140:6 | 32:20 164:9 | 35:5,9,10,11 40:1 |
| 254:6,10,13 | 210:18 211:15 | 141:14,19 146:4,6 | 166:15 192:7 | 40:8 41:2,4,21 |
| 257:22 258:16 | 229:12,16 231:2,6 | 146:8,14 148:5,13 | 209:17,19 | 45:18 50:22 54:12 |
| 265:13,16,20 | 231:10,21 232:1 | 148:18,21 149:5,9 | media 155:10 | 54:15 55:3,9,14 |
| 268:17 272:13,18 | 232:11 233:14 | 149:12,17,21 | 320:18 321:2 | 56:3,9,17 57:13 |
| 276:8 277:4 | 234:6,16,17,19 | 151:13 161:16 | medical 315:4 | 57:18 58:7,10,19 |
| 298:15 299:13 | 238:15 242:4,17 | 162:4 164:16 | medicine 193:7 | 59:1,4 62:17 |
| 339:18 341:14 | 244:16 246:10 | 166:16 167:6,10 | meet 9:13 13:9,10 | 64:10,14 65:7,13 |
| 343:8 355:8,14 | 249:1,19 275:8,13 | 167:21 186:15 | 33:9 81:15 89:17 | 72:20 73:15 74:10 |
| 356:15 361:13 | 293:11,15 309:7 | 189:10,22 190:7 | 142:2 147:10,13 | 76:13 77:10,21 |
| 366:8 367:2 385:2 | 310:1 324:20 | 199:10,21 200:3,7 | 147:21 160:17 | 80:3 81:4,13,22 |
| 385:8,13,16,21 | 341:3,20 342:9,12 | 201:10,21 259:18 | 220:17 | 82:20 83:4,6 |
| 386:20 387:1,4,14 | 378:8 379:12 | 348:20 353:22 | meeting 1:6 5:4 | 103:19 104:15 |
| 388:6 389:17 | materials 7:22 15:1 | 355:12,21 356:5,8 | 8:22 12:9 14:19 | 105:6,19 106:17 |
| March 46:19 | 20:16 24:15,19 | 356:11 366:14 | 15:19 16:19 30:13 | 107:4,15,17,20 |
| Marinova 8:9 10:7 | 26:12 29:8 35:13 | 389:3 390:18 | 30:16,21 38:3,12 | 108:2,3,4,10,14 |
| market 38:10 49:7 | 56:20 61:8 73:5 | 391:2 | 39:1,2,16 169:10 | 108:19,22 109:15 |
| 68:5 105:2 139:16 | 75:12 76:1 80:22 | mean 19:2 74:2,18 | 170:10 193:19 | 109:16,17,19,21 |
| 139:18 184:13 | 81:6 100:5,7,8 | 75:2 76:17,20 | 197:13 204:4 | 109:22 110:1,2,3 |
| 190:6 217:7 | 101:1 104:5 | 77:15 81:16 84:9 | 205:15 209:1,8 | 110:4,5,6,7,8,9,10 |
| 286:21 301:13 | 106:15 108:6,12 | 103:22 104:2 | 269:17 281:2 | 110:12,14,17,19 |
| marketable 50:21 | 108:17 121:20 | 131:3 135:7 | 282:20 288:17 | 110:20 111:3,9,10 |
| marketed 213:3 | 137:12 145:16 | 139:10,13 156:12 | 314:17,18 359:18 | 111:11,12,13,14 |
| marketer 292:19 | 147:2,10,20 | 160:20 161:2,6 | 363:16 364:4 | 111:15,16,17,18 |
| marketing 1:3 49:2 | 148:22 153:18,22 | 163:12 166:12 | 371:6,8,18 374:22 | 111:19,20,21,22 |
| 51:5,14 73:21 | 166:3,13,22 | 188:5,14 194:21 | 376:4 377:3 | 112:2,6,7,13,14 |
| 349:20 | 167:12 195:5 | 198:16 201:5 | 379:14 380:13 | 112:16 113:13,20 |
| marketplace 58:13 | 204:15,16 214:4 | 206:17 256:10 | 382:5 391:14 | 113:21,22 114:1,2 |
| 184:7 | 238:18 242:9 | 261:10 265:8 | meetings 37:11 | 114:3,4,5,6,7,8,9 |
| markets 59:13 | 243:2 272:5 | 279:5 284:19 | 38:22 95:19 | 114:10,11,14,18 |
| 289:16 | 309:16 314:12 | 286:10 301:16,18 | 284:10 296:12 | 114:19 115:6,10 |

| | | | | |
|-------------------|--------------------|-------------------|-------------------------|---------------------------|
| 115:11,12,13,14 | 162:18,21 163:11 | 241:2,4,5,10 | 339:15,16,17,18 | 380:8 |
| 115:15,16,17,18 | 164:1 166:9 167:5 | 243:6 244:10,20 | 339:19,20,21,22 | memory 251:6 |
| 115:19,20,21,22 | 167:9,20 168:16 | 245:2,3,4,5,6,7,8 | 340:1,2,6,15 | mention 93:4 |
| 116:1,4,9,17,18 | 169:8,17 183:20 | 245:9,10,11,12,13 | 341:10,11,14,22 | 108:19 194:22 |
| 116:19,20,21,22 | 184:2,9,18 185:9 | 245:14,15,17 | 342:6,7,11,13,15 | 241:7 243:8 |
| 117:1,2,3,4,5,6,7 | 185:18,20,22 | 246:1,7,9,20,21 | 343:2,3,4,5,6,7,8 | mentioned 19:14 |
| 117:8,11,15,16,19 | 186:1,6,7,8,14 | 247:5,6,7,8,9,10 | 343:9,10,11,12,13 | 29:17 32:18 83:7 |
| 118:6,11 119:6,8 | 188:3,4 189:9,11 | 247:11,12,13,14 | 343:14,15,18 | 118:10 165:12 |
| 119:16 121:3,4,5 | 189:19,21 190:2 | 247:15,16,17,18 | 347:14,16,18 | 186:22 220:14 |
| 121:6,7,8,9,10,11 | 190:20 191:6 | 247:21 248:4,5,18 | 348:19 350:4,5 | 240:12 295:4 |
| 121:12,13,14,15 | 192:21 197:6,9,14 | 248:20 249:2 | 353:4,5,19 355:7 | 311:9 326:22 |
| 121:16,19 122:3,4 | 197:16,17,18,21 | 250:6,7,8,9,10,11 | 355:8,14 356:3,6 | 356:17 |
| 122:10,11,12,13 | 198:6,7,13,20 | 250:12,13,14,15 | 356:9,15 357:1,16 | mentioning 109:1 |
| 122:14,15,16,17 | 199:5,20 200:1,4 | 250:16,17,18,19 | 357:17 361:13 | Merchant 192:2 |
| 122:18,19,20,21 | 200:13,15,16 | 251:2 252:1,4,14 | 364:17 365:12,22 | message 163:5 |
| 122:22 123:1,4,9 | 201:1,5,18 202:1 | 252:17,21 253:18 | 366:8,10,16,18 | 175:1 188:9 189:4 |
| 123:10,16,17,18 | 202:5,9,10,11,12 | 253:21 254:3,6,7 | 367:2,12 368:18 | messages 324:5 |
| 123:19,20,21,22 | 202:13,14,15,16 | 254:10,12,13,15 | 370:16 372:19 | met 13:4 15:12 |
| 124:1,2,3,4,5,6,7 | 202:17,18,19,20 | 255:1,6,11,15,18 | 377:11 379:10 | 17:8 148:10 |
| 124:10,17,19 | 202:21,22 217:2,9 | 255:20 257:13,15 | 381:15,19 382:2,4 | 221:21 271:3 |
| 125:2,8,13,17 | 218:2,12,17 | 257:22 258:2,5,16 | 383:17 384:3,13 | methionine 222:22 |
| 126:1,7 127:8,11 | 219:19 220:1,6,8 | 259:2,7,8,15 | 384:19,22 385:2,5 | 224:2 225:20 |
| 127:12,13 128:4,5 | 220:11,12 222:4 | 260:22 261:8 | 385:8,13,15,16,20 | 374:5,19 375:15 |
| 128:6,10,17,19,21 | 222:12,20 223:8 | 263:3 264:2,6,7,9 | 385:21 386:1,9,16 | 375:21 |
| 129:3,12,16 | 223:12,19,22 | 265:2,4,5,8,10,11 | 386:20,21 387:1,2 | method 75:16 |
| 130:15 131:9 | 224:9,10,18,19,20 | 265:13,16,20,21 | 387:4,9,11,14 | 174:11 243:17 |
| 132:3,11,16 | 224:21,22 225:1,2 | 267:3,6,14,17 | 388:6,9,15,18 | 249:7 330:17 |
| 133:14 134:3,8,18 | 225:3,4,5,6,7,8,9 | 268:1,2,9,10,11 | 389:12,13,14,15 | methodology |
| 135:6,9,10,13,15 | 225:13 226:3,4,5 | 268:12,13,14,15 | 389:16,17,19,20 | 155:20 360:16 |
| 135:19 136:5,6,12 | 226:6,10,14,15,16 | 268:16,17,18,19 | 389:21,22 390:1,2 | methods 233:6 |
| 138:11 139:1,3,4 | 226:17,18,19,20 | 268:20,21,22 | 390:3,4 | 243:1 346:4 371:2 |
| 142:11 143:3,5,6 | 226:21,22 227:1,2 | 270:13,21 272:13 | members 1:15 | 371:12,16,21 |
| 143:8,16,21 144:3 | 227:3,4,5,9,15,17 | 272:16,18,20 | 38:11 63:16 67:6 | 374:15 |
| 144:10,11,18,20 | 227:18,20 228:2,3 | 273:19 274:2,4,6 | 67:22 77:6 86:20 | Methyl 53:4 |
| 144:22 145:2,3,4 | 228:4,5,6,7,8,9,10 | 274:18 276:7,8,22 | 86:21,22 95:16 | Michael 51:8 |
| 145:5,7,8,11,12 | 228:11,12,13,14 | 277:4 280:15,17 | 106:7 126:5 | Michelle 2:14 18:1 |
| 145:13,14,22 | 228:15 229:3,6 | 287:14 292:5,9,10 | 130:22 136:11 | 107:1 112:8 116:5 |
| 146:1,5,7,13 | 230:10,12,14,17 | 294:3 296:4 | 205:20 206:3 | 127:9 128:7,8,22 |
| 148:1,11,16,19 | 230:19 231:3,17 | 297:16,19,22 | 219:17 258:19 | 191:13 198:13 |
| 149:3,6,11,15,18 | 233:10,11 234:1,2 | 298:15 299:13,18 | 287:21 301:2 | 205:6 218:10 |
| 149:22 150:3,8 | 235:12,19 236:1,2 | 301:16 303:17 | 306:4 307:21 | 224:16 251:19 |
| 152:8,22 153:15 | 236:10,13,16,20 | 305:7 307:20 | 334:1 372:16 | 258:5 270:21 |
| 154:6,12,14,16,20 | 236:21,22 237:1,2 | 310:18 320:4 | 373:21 389:6 | 340:8 342:19 |
| 155:13 156:14 | 237:3,4,5,6,7,8,9 | 322:16 326:18 | memo 78:1 140:12 | 366:19 388:22 |
| 158:1 159:20 | 237:10,11,14,19 | 328:14 330:10 | 164:22 255:4 | 392:20 |
| 160:9,12,18,22 | 237:20,21 238:2 | 333:19 338:1 | 380:16 381:1 | Michelle's 204:22 |
| 161:11,13 162:1,7 | 239:1,2 240:16 | 339:2,9,10,11,14 | memorandum | 205:10 218:18 |

| | | | | |
|---------------------------------|--------------------------------|------------------------------------------|-------------------------|---------------------------|
| 367:18 | 131:15,19 | Monday 18:8 186:5 325:4 | 121:22 122:5 | 114:15 116:7 |
| microbial 16:10 | minority 241:16 | money 289:5,10,10 294:19 302:8 | 123:5 124:9,13 | 117:12,13 121:22 |
| microclimates 309:15 | 277:10 280:12 | 316:18 391:9 | 125:15,19 132:20 | 123:4,5 130:5 |
| micronutrients 382:10 | minuscule 334:17 | Monge 3:8 35:22 | 133:13,15,22 | 151:9 158:6 169:6 |
| microorganisms 97:12 | minute 340:9 | 36:12,15,18 37:1 | 183:11 197:8,11 | 226:3 228:22 |
| microphone 36:22 | minutes 36:7 45:21 | 37:7 40:7,22 | 197:19 219:7 | 230:6,7 235:11 |
| 264:13 385:12 | 98:14 106:4 | 41:10,16 | 222:21,21 223:7 | 237:19 246:17 |
| 392:10 | 125:10 192:8 | monitoring 99:11 | 223:13 224:1,1,6 | 247:22 251:9 |
| microphones 264:19 | 203:3,9,11 273:9 | 244:4 347:5,6,8 | 224:8,10 225:19 | 252:3,9 266:1 |
| middle 336:18,20 | 273:10 359:7,13 | 353:14 | 226:2,7 227:7,10 | 271:10 282:7,9,10 |
| 337:15 | misinformed 69:12 | monocultures 312:20 | 227:10,12,14 | 297:6 320:3 331:8 |
| Midwest 309:14 | misinterpreted 23:19 | 312:20 | 228:18 230:3,8,16 | 333:8 335:21 |
| 324:2 | misleading 320:17 | monster 262:9 | 231:14 235:17,19 | 337:12 351:11 |
| Mildred 294:5 | 335:12 392:8 | Montana 195:5 | 236:6,12 237:15 | 357:13 371:6 |
| Miles 2:12 33:2 | misled 317:8 | month 95:15 | 237:21 238:1 | 382:21 384:4 |
| 34:5,7 35:7 | missing 138:8 | monthly 378:13 | 245:22 246:15,22 | 386:5 |
| 132:12 134:13 | 259:20 263:15 | months 22:21 | 247:22 248:7 | moved 27:12 208:6 |
| 140:5 146:7 | 334:12 335:20 | 30:16,17 37:20 | 250:21 251:15 | 231:12 282:11 |
| 161:15 163:3 | mistake 124:14 | 88:17 192:16 | 252:4 267:10,20 | movement 41:18 |
| 164:1,15 186:14 | 157:9 | 258:12 280:13 | 268:5 270:11 | 64:12 |
| 189:11 190:2 | mistaken 244:14 | 323:22,22 324:17 | 271:5,9,16 272:10 | moving 11:10 |
| 256:12 259:15 | mistakes 63:20 | moral 50:21 | 272:14 273:20 | 15:18 26:9 114:14 |
| 354:22 355:9 | mistrust 392:7 | morning 6:2 7:8 | 275:18 276:6,12 | 116:4 124:10 |
| 363:18 390:8,17 | mite 283:22 284:1 | 37:1 45:17 92:2 | 276:16 310:17 | 253:2 282:11 |
| milk 177:2,3 | mixed 347:20 | 94:22 98:7 100:6 | 340:4,7,14,17,18 | 298:10 375:3 |
| milks 370:2 | mode 241:19 | 101:20 124:12 | 340:22 342:1 | moxie 290:17 |
| milk-type 177:22 | 242:13 | 133:4,11 192:11 | 343:20 345:13 | MRO 105:10,17 |
| million 53:21 | models 99:13 | 197:13 203:4 | 347:12,20 348:18 | MROs 25:1,7 |
| 390:21 391:4,5 | 315:20 346:7 | 219:2 252:6 253:2 | 353:7,8 360:19,21 | 103:21 |
| millions 294:18 | moderate 57:22 | 253:13 255:13,22 | 361:10 363:9 | muddier 125:19 |
| mind 100:16 | Modernization 351:20 | 263:4 325:4,8 | 364:11,19,20 | mulch 383:11 |
| 119:13 279:10 | modified 54:21 | 391:22 | 366:1,2,13,19 | multi 176:22 198:3 |
| 280:10 295:3 | 133:21 275:18 | Morris 85:19 | 367:10,18 377:10 | 199:20 200:4 |
| 301:19 | modify 133:20 | 315:10 | 381:17 384:1,4,14 | multinational 49:1 |
| minds 323:3 | 154:18 200:22 | MOSA 170:14 | 384:17,20 385:3 | multiple 44:14 |
| mine 50:17 57:17 | 350:17 | moth 99:20 | 385:17 386:2,2,10 | 50:11 137:1 231:8 |
| 58:9 | moisture 346:8 | mother 192:13 | 386:17,22 387:6,8 | 304:9 |
| mined 230:22 | moldy 57:11 | 293:17 | 387:12,17,18,20 | multi-ingredient |
| 231:9 | mom 325:10 | motion 13:13,15 | 388:12,14,19,19 | 169:12,21 170:4 |
| minerals 97:13 | moment 11:8 13:19 | 15:14 17:10 | 390:6 | 179:20 180:9,11 |
| minimal 207:3 | 15:17 17:14 28:4 | 106:20 107:15,17 | motions 111:1 | 180:12 181:5 |
| minimize 344:13 | 33:1 62:7 107:6 | 109:10 110:13 | 225:18 | 182:9,16 183:4 |
| minor 29:10 | 256:7 357:3 | 112:10 113:16 | Mount 89:3 | 185:4,5 187:6 |
| | 372:21 373:18 | 114:15,21 116:3,6 | mouth 318:7 | 188:10,14 199:15 |
| | 374:13 | 116:12 117:12,17 | move 13:21 33:14 | 200:9 |
| | | | 84:5,16,17 85:1 | multi-ingredients |
| | | | 107:21,22 110:14 | 200:2 |

| | | | | |
|--------------------------|---------------------------|----------------------------|--------------------------|----------------------------|
| mumbling 132:13 | natural 38:5,21 | 293:9,21 296:17 | 47:5,11,14 58:4 | non-agricultural |
| mysterious 46:20 | 49:6 52:3 59:13 | 299:10,10 300:19 | 74:22 88:16 94:6 | 147:3 |
| N | 95:8,10,11,16 | 303:12 309:20 | 104:21 157:6 | non-antibiotic |
| nagging 378:6 | 170:14 181:13 | 313:2 314:11,13 | 185:3 192:15 | 346:4 |
| name 25:16 36:2 | 194:4 220:15 | 316:2 319:12,14 | 194:2 195:16 | non-certified 144:8 |
| 41:20 45:17 50:9 | 231:9 376:22 | 334:15 337:2 | 222:16 234:19 | 144:15 145:6,21 |
| 59:10 69:4 73:1 | Nature 293:17 | 340:9,19,20 346:6 | 249:11 271:16 | 153:19 154:21 |
| 88:1 92:3 95:1 | 294:1 | 355:2 360:3 | 276:6 301:2 | 156:1,11 |
| 98:8 101:17,20 | naught 83:16 | 363:22 375:20 | 312:10 321:8 | non-essential 73:21 |
| 192:11 255:4,10 | nay 389:10 | 380:2,17 385:11 | 326:13 348:21 | non-GMO 89:18 |
| named 32:14 | nearest 173:14 | 386:3,7,16 391:7 | 349:3,10 382:17 | non-Kentucky |
| names 157:20 | nearly 52:7 59:12 | needed 47:2 112:21 | news 335:2 382:16 | 101:17 |
| 191:20 254:1 | necessarily 66:22 | 113:1,5 154:18 | NGOs 19:4 20:1 | non-organic 12:13 |
| 264:14 | 78:6 84:2 98:12 | 158:7,8 215:11,18 | 39:4 | 60:5 146:18 179:2 |
| narrowed 249:13 | 124:18 164:12 | 215:20,22 294:11 | nice 40:19 187:1 | 180:1,15 182:3 |
| narrower 283:5 | 187:16 206:17 | 307:6 | 336:21 | 257:11 258:3 |
| narrowing 249:6 | 210:13 261:10 | needs 20:7 38:7 | nicely 75:8 | 346:13 |
| national 1:3,6,11 | 296:14 297:5 | 71:22 72:7,9 91:9 | NICHOLAS 1:22 | non-specific 231:20 |
| 2:12,17,18 8:11 | 326:12 357:4 | 147:9 150:21 | Nick 28:6 31:18 | non-synthetic |
| 8:13 11:20 12:1 | necessary 9:5 23:7 | 171:4 279:3,3 | 34:6 77:9 126:6 | 24:14 |
| 13:17 14:8,10 | 50:21 81:9 100:11 | 326:2 331:9 360:8 | 129:13 130:17 | NOP 1:3 8:20 12:8 |
| 16:9,11 20:14 | 151:11 198:11 | 366:21 375:18 | 150:7 152:7 | 14:17 16:17 18:6 |
| 39:5 42:7,9 45:6 | 216:6 258:14 | negative 10:3 44:10 | 160:11 162:18 | 19:15 20:5,8,17 |
| 48:11 51:3 59:20 | 279:11 320:1 | 57:5,12 104:16 | 168:7,15 226:13 | 22:13 23:14 25:6 |
| 70:14 71:11,19 | 344:15 348:16 | 105:7 357:11 | 258:15 265:12 | 26:7 92:20 98:16 |
| 75:13 78:15 79:6 | need 10:16 20:15 | neighbor 297:10 | 272:20 276:7 | 99:2,7 102:15 |
| 80:16,18,20,21 | 21:20 31:13 35:6 | neighbors 6:17 | 277:3 280:15,18 | 104:3,14 105:14 |
| 83:21 89:11,17 | 61:14 63:7,18 | 325:11 | 280:22 286:11 | 105:15,18 138:12 |
| 92:15,18,21 93:3 | 72:11 73:3 78:21 | neither 7:1 175:1 | 315:16 341:13 | 170:1 174:17,22 |
| 93:6,8 94:8 97:6 | 79:10,13,18 80:15 | neonic 47:21 | 355:7,12 360:3 | 175:2,19 176:11 |
| 104:7,8 108:13 | 80:17 85:20 90:17 | neonicotinoid | 361:12 367:1 | 176:19 177:9,10 |
| 123:7 141:4 | 99:3 109:2 118:22 | 46:16 | 381:22 385:1 | 178:11 181:16 |
| 143:10 148:19 | 125:1 130:4 | neonicotinoids | 387:11 388:9 | 182:21 183:1 |
| 164:6 166:14,19 | 133:22 135:4,7 | 47:12,15 | Nick's 134:3 | 186:20 188:9 |
| 166:22 167:22 | 137:8,10 147:12 | neonics 46:16 | 251:12,20 292:18 | 189:4 201:2 |
| 175:13 176:3,4 | 150:10 151:22 | nervous 305:9,10 | 364:19 | 206:14 208:13 |
| 195:11,12 206:10 | 156:9 159:11 | 305:11 | night 336:18 | 257:6 344:9,16 |
| 207:1,10 237:16 | 161:1,2 162:13 | net 171:21 263:8 | Nike 295:9 | 345:14 346:22 |
| 238:5 253:7 256:2 | 164:1 166:12 | 349:22 350:7 | nine 245:21,22 | 348:15 353:11 |
| 256:5 257:4,12,20 | 168:12 188:12,12 | 360:1,16 390:12 | 340:4 374:8 | 355:16 358:12 |
| 258:4 260:6,8,13 | 188:13 212:15 | never 26:19 51:9 | nitpickers 67:7 | 384:5 392:16 |
| 261:12 266:4 | 214:9 216:3,7,18 | 97:10 98:16 | nitrogen 206:19 | NOP-certified |
| 280:22 306:12 | 216:18 223:7,16 | 312:16 313:6 | nobody's 281:12 | 180:9 |
| 341:1,16 345:16 | 257:7 259:21 | 348:3 386:17,18 | NOC 10:19 170:16 | Nordic 14:3 46:12 |
| 345:17 390:22 | 260:9 262:15 | 386:21 393:3 | nod 223:15 | normal 22:19 23:5 |
| nation's 47:3 | 263:10 277:15 | new 21:13 24:18 | non 147:14 155:20 | 99:18 278:3 |
| | 286:9,13 287:8 | 37:8,16 46:18 | 199:16 257:2,18 | 335:12 360:9 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| normally 360:2 387:17 | 272:7 354:7 377:15 378:22 391:7 | 65:18 71:12,16 80:21 81:15 92:12 93:6 94:4 104:6 126:21 127:18,18 128:12,13,18,22 134:4 139:5,8,10 139:15 140:4 148:4 158:12 164:11 173:21 185:21 198:12 251:21 253:8 257:2 266:5 | 212:18 215:2 217:15,20 218:17 218:21 220:6 222:20 226:4,6,10 226:12 227:15 229:6 230:12 235:19 236:10,18 237:14 238:7,21 241:2 244:22 246:2 252:8,17 253:12,20 254:12 255:3,11,15 263:1 263:3 265:4,20 267:17 269:6 270:10,21 272:18 273:18,19 274:18 276:21 280:17 281:16 282:8,12 283:12 292:10,11 292:16 303:7,7 333:19 340:7,17 342:7,22 343:18 359:16 367:9 370:11,18 372:2 373:22 377:9 378:17 379:9 381:16 382:3,4 383:20 384:19 385:15,20 388:7 389:7 390:13 | 309:15 334:16 one-size-fits-all 352:22 ongoing 209:6 266:8 320:20 378:10 379:15 on-the-ground 278:22 open 30:19 48:11 82:12 230:8 255:14 261:22 273:21 282:22 283:10 323:2 360:9 368:19 opening 8:21 12:8 14:18 16:18 openly 273:5 openmindedness 323:1 openness 265:22 operating 45:4 186:13 208:14 operation 109:4 174:7 344:22 345:2,4 operations 305:1 operators 156:18 opinion 95:21 199:9 241:14,16 244:11 331:7,22 361:15 380:17 opinions 190:15 opportunities 107:10 120:15 opportunity 68:15 300:18 306:3 307:11,16 335:19 335:22 336:6,7 337:13 357:14 370:20 385:18 388:1 oppose 49:18 opposed 104:17 185:12 233:4 348:1 388:5 option 20:2 283:16 297:9 375:15,21 |
| nos 117:10 121:18 124:9 225:11 227:7 228:17 | numbers 289:3 numerous 50:15 nut 370:2 nutraceutical 48:22 nutrient 52:9,12 61:17 nutrients 49:9 52:5 nutrition 69:7 222:7 nutritional 12:15 nutritionist 95:1 | OFFPA's 79:17 oh 39:22 57:20 103:17 109:19 114:19 119:7 168:15 205:4 223:8,19 252:10 263:16 267:5 312:22 319:2 368:20 381:16,22 385:15 390:16 oil 62:9 76:4 179:4 okay 7:6,6 13:20 19:14 20:1 22:12 24:7 26:9 32:3,17 32:21,22 34:22 35:9 36:19 37:1 40:8 45:15 54:14 82:22 92:2 109:8 109:13 111:7 112:16 114:22 119:6 124:17 125:1 127:8 128:10,19,21 129:16,17 134:16 135:19 145:8,15 145:22 146:5 149:9,22,22 150:10 163:16 164:16 167:20 168:4,15 169:5 183:13 184:18 185:22 186:6 192:4 196:8 202:1 204:14 205:20 206:21 207:17 | 292:22 297:13 occasionally 251:6 297:13 occur 81:17 93:16 ocean 263:8 October 215:13 219:10 271:19 272:2 344:12,12 345:21 366:6,7 384:11,12 odds 199:1 offer 88:4 369:14 offices 336:21 official 192:17 212:3 OFFPA 20:4,6,13 21:8 28:16,22 48:1 60:4,17 | old 98:22 100:1 208:16,19 omnivore 374:10 374:20 375:7 376:19 OMRI 101:21 102:2,15 once 6:6 15:20 27:5 29:16 265:14 273:12 299:2 300:14 OneCert 170:16 181:12 ones 24:14 61:11 84:18 85:16 87:12 153:5 155:3 213:21 255:14 |
| NOSB 1:6 20:20 23:12 24:22 25:4 25:19 26:3 27:3,4 28:14 30:8 31:6 32:19 38:2,3,11 38:12 39:16 43:4 45:5 60:1 61:1 62:18 64:15 72:7 79:20 92:16 93:6 93:21,22 95:16,18 98:15 99:7 102:13 103:2,21 127:7,17 138:12 175:1 176:12 182:22 195:4 205:20 209:2 214:17 253:5 257:8 259:22 261:1 290:18 300:21 344:16 345:16 346:1 353:11 358:10,12 362:21 369:2 380:10,21 | <hr/> O <hr/> objection 258:17 objects 96:10 obsolete 208:14 obtain 92:19 obtained 88:17 180:16 obtaining 88:15 obviously 29:11 65:4 78:22 180:18 182:22 191:3 315:12 320:21 322:18 328:14 361:3 occasionally 251:6 297:13 occur 81:17 93:16 ocean 263:8 October 215:13 219:10 271:19 272:2 344:12,12 345:21 366:6,7 384:11,12 odds 199:1 offer 88:4 369:14 offices 336:21 official 192:17 212:3 OFFPA 20:4,6,13 21:8 28:16,22 48:1 60:4,17 | note 186:18 195:15 noted 10:14 notice 30:13 211:20 212:2,4,8,13,18 214:2 notification 211:10 notify 209:17 211:11,15 November 78:2 no-brainer 46:9 nuanced 304:8 nuisance 69:11 number 9:14 33:6 168:3 173:14 208:18 210:16 221:3,4 238:14 261:9 263:18 | note 186:18 195:15 noted 10:14 notice 30:13 211:20 212:2,4,8,13,18 214:2 notification 211:10 notify 209:17 211:11,15 November 78:2 no-brainer 46:9 nuanced 304:8 nuisance 69:11 number 9:14 33:6 168:3 173:14 208:18 210:16 221:3,4 238:14 261:9 263:18 | |

| | | | | |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| options 283:12,14 358:2 375:8,10 | 71:22 72:2,9,9,14 73:15,22 75:19 76:6 78:8,14 79:6 79:6,22 80:2 83:9 84:6,8 85:10 87:5 87:6,7 88:2,8,9,12 90:4,6,8,12,14 95:6,7,10,13,22 96:5 97:4,4,15,16 97:17 99:22 100:8 100:10 101:1,6 104:5 105:22 112:21 113:2,6 117:22 139:21 145:10,16 146:9 146:11,15,20 147:4,6,17,19 155:16,17 156:2,5 159:3 165:20 166:17,18 169:11 169:20 170:5,5,7 171:13,17,18,18 171:20 172:1,12 175:16 176:8 177:20 180:2,10 180:16,18,18,21 180:21 181:4,18 181:19,20,22 182:2,6,7,9,15,17 183:3 184:8,11 185:12,14,16,17 186:18 188:1,2 193:3,8,14 194:5 194:6,7,14,20 195:4,7,8,11 196:1,4 198:2,3 198:19 199:13,17 199:19 200:10 206:9 207:7,8 211:13 212:11,12 213:3,4 217:6 219:6 223:5 226:1 233:4,8 237:17 248:12 257:11,19 257:19 258:3 270:5 271:21 278:6 279:18 | 280:22 285:10 286:5,6,8 288:18 289:1,13,21,21 290:2,6,7,16,19 290:22 291:14,19 291:21,22 292:20 292:22 293:1,10 296:1,22 297:12 298:18,19 300:13 302:9 306:5,8,12 306:13,16 308:5,6 309:1,21 310:12 310:13 311:10 314:6 315:22 316:4,4,6,12 317:4,11,21 318:4 318:8,22 319:3,16 320:2,12,13,20 321:1,20 322:5 323:20 324:6 325:17,21 329:11 332:21 333:4,5,7 334:12,14 336:14 337:13,17 338:4,5 338:20 341:1,17 341:19 344:18 346:17,20 348:4 351:9 352:18 356:10,13,18 361:19 369:9 370:1,4 374:6 384:8 390:22 392:9 | organization 85:20 102:16 175:5 organizations 170:13,20 211:15 organize 38:21 original 18:16 104:20 251:20 271:15 313:17 340:16 386:2,11 originally 18:6 26:14 67:14 112:17 271:6 318:14 OSP 329:13 OSPs 306:11 OTA 19:2 170:13 170:21 181:12 OTCO 170:16 177:6,7 181:12 183:8 other's 262:14 outbreak 346:7 outcome 216:2,5 294:8 306:19 outdated 178:6 outlier 374:5 outlook 277:22 outset 308:3 outside 153:12 158:10 329:22 outweigh 101:4 out-of-date 186:20 overall 77:5 102:22 230:15 234:10 overly 262:7 355:2 overplaying 361:18 oversight 275:21 297:14 overuse 239:10 overview 169:15 overwhelm 65:22 overwhelming 61:19 owe 327:21 owner 192:17 oxide 382:12 oxytet 376:12 | oxytetracycline 291:7 320:11 321:12 345:20 346:11 384:10 ozone-depleting 53:5 O-F 3:2 4:10 |
| | | | P | |
| | | | package 174:4 packaging 51:8 57:10 packing 38:9 page 23:17 46:17 127:13 129:14,17 223:13 263:17 277:11 pages 168:10 painless 102:4 103:10 panel 93:2 152:19 152:21 172:19 paper 17:2 100:4 150:12 367:11 paperwork 19:19 89:8 189:7 paragraph 24:10 25:2 255:16,19,21 256:20 353:10 paragraphs 151:7 168:10 parallel 21:8 64:20 261:15 pardon 368:19 parent 311:10 317:10 parentheses 156:10 254:4 parents 195:16 parliamentarian 133:16 267:7 387:16,21 parse 256:16 part 6:6,13,16,18 13:5 21:5 27:11 27:18 35:18 49:17 60:20 63:3,11 | |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 70:22 71:3 75:8 83:9 84:1 87:6 92:13 93:20 94:5 102:9 105:2 120:4 131:18 136:14 140:16 149:1 151:15,19 164:20 181:9 185:8 186:19,21 193:9 193:10 195:3 201:13 206:1 208:8 211:5 240:17 242:3 244:13 256:14 303:17 324:6 325:21 327:6,8,22 328:10 332:3,15 345:3,7 348:18 351:7 358:10,13 367:3,5 377:1,20 | passed 201:15 342:2 348:22 passes 6:14 365:16 passing 186:19 passion 333:22 337:22 passionate 83:18 320:7 337:9,10 338:5,13 passive 99:1 100:20 207:15 patent 53:16 56:1 73:2 76:22 patented 55:20 77:1,2 path 282:14 283:4 pathogen 298:21 pathogenic 42:21 pathogens 239:14 331:12 pattern 208:5 pay 319:3 PCC 10:19 49:6 52:3 59:13 61:14 64:15 PCO 170:16 pear 196:3,4 285:9 291:1 306:9 321:21 338:19 366:5 pears 193:12 194:21 195:14 272:2 279:19 283:18 309:13 320:12 322:4 334:14 344:3,11 345:20 peer-reviewed 320:10 penalizing 332:14 penalty 332:11 pens 263:8 people 23:19 30:19 35:2 49:14 50:14 57:19 58:4,22 63:16,20 67:3 68:6,7,8 69:22 | 70:16 88:14 95:20 118:20 170:18 171:1 191:11 195:17 200:16 234:14 254:7,17 255:13 256:14 262:16 269:22 270:2,8 273:5 275:4,19 276:2,2 281:4 282:21 283:11 284:12,16 285:2 287:9,20 290:18 292:21 299:20 302:6,19 304:5 308:15 311:21 312:22 313:9,21 314:8,12 314:19 315:14 316:3 317:2,4,16 319:7,9,15 323:11 323:13 324:22 338:19 350:1 357:21,21 358:7 360:11 367:7 378:22 390:19 392:1 393:4 people's 19:12 305:11 310:8 320:1 338:15 peracetic 43:10 perceive 81:17 perceived 280:1 percent 47:2 48:15 58:12 89:13 97:3 170:5 171:17 176:7 179:22 180:3,14,17,18,21 180:21 182:5,7,15 184:8,11,13,21 185:2,5,6,13,16 189:16,17,20 196:3 198:2,18 199:13,19 200:10 200:11 286:22 391:9 percentage 169:11 169:20 170:6 | 171:12,14 173:11 174:2,7 176:17 181:20,21 182:2 183:3 187:22 190:12 198:3 210:12 285:2,8,11 298:17 317:20 369:22 370:4 percentages 170:8 perception 142:12 231:1 293:22 perennial 283:21 perfect 166:11 196:21 238:20,21 357:4 perfectly 70:3 perform 66:16 period 8:21 12:9 14:19 16:19 27:22 62:5 130:1 215:6 215:18 284:8 310:14 344:14 346:16 384:11 permanently 305:5 permitted 22:7 81:7 82:22 321:20 permutations 141:16 peroxide 43:12 peroxyhydrate 383:5 personal 281:6 282:12 283:20 286:16 368:7 380:17 personally 112:22 201:3 280:21 284:13 311:1 perspective 66:1,5 66:5 163:19 187:1 277:6 283:13 301:21 302:12,13 302:17 304:19 311:6,7 357:3,10 357:12 perspectives 323:9 persuades 320:10 | pertain 91:13 Peru 39:3,6 pest 99:13,14,21 329:14 345:1,10 354:5 pesticide 43:2 45:2 46:15 47:21 207:7 209:4 210:5,8 313:2 pesticides 10:19 46:16 47:11 52:21 70:2 74:1 95:9 97:19 170:15 206:11 208:5 318:10 pet 3:24 204:21 218:6 219:7 220:3 221:4,18 223:5 226:1 227:12 petition 8:7,10,19 9:10,15 10:2,10 11:14,16,19 12:7 12:20 14:2,4,6,17 16:5,7,16 29:10 29:11,16,18 30:2 30:13,14 37:8,11 37:17 42:4 43:3 45:6,22 48:2,6 51:2 54:7 73:5,6 73:10 74:9 76:1,4 76:7 77:1 79:12 80:5,8,10,17,19 81:8 96:9,15,16 97:8 218:15 239:21 246:10 370:13 373:2,3 377:13 378:10 382:6,7,11 petitioned 8:8 12:12 13:14 16:2 17:3 48:22 51:4 60:10 74:13 93:14 112:11 114:16 115:7 116:8 117:14 122:2 123:6 137:13 225:15 230:4 |
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| | | | | |
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| 235:21 246:19 248:1 249:3 253:7 petitioner 10:8 44:7 46:12 48:7 74:20 82:9,17 104:20 229:21 231:7 240:18 249:6 372:22 petitioners 25:14 37:13 104:21 petitions 30:18 62:20 94:6,10,13 97:3 152:4 208:18 368:5 Pfeifer 206:4 PGME 373:3 pH 9:12 240:6 phase 63:1 255:9 273:2 phased 53:6 322:9 phase-out 341:2,18 342:2 phasing 276:19 phenylalanine 223:2 224:4 225:22 pheromone 99:1,8 100:21 101:7 207:15 pheromones 99:10 99:14 100:12 phone 317:3 323:21 phrase 172:8 173:10 phrased 162:8 physical 291:10 physicians 85:19 315:9 pick 297:9 picture 303:1 304:14 307:13 piece 190:5,9 369:1 pig 49:17 pineapple 37:4 pissed 295:8 Piura 39:3 | place 6:4,6,21,22 9:20 131:6 141:22 142:3,14 216:8 242:12 277:2 304:22 332:8 336:11 placed 100:19 places 318:17 plain 131:8 plan 25:17 28:21 31:2 106:18 211:16 326:16 329:11 333:17 346:20 368:4,19 368:21 370:6,10 371:5 372:2,11 374:14 377:12 381:2,5 383:21 386:12 planning 20:11 21:11,18 plans 367:17,19,22 368:8 377:16 plant 6:18 240:22 248:2,9,15 249:20 271:22 331:12 345:7 planted 350:10 planting 248:12 350:13 plants 47:12 382:9 plate 249:14 304:1 play 104:1 played 204:6 players 281:11 playing 25:15 82:17 293:4 pleasant 64:7 please 33:2 35:22 38:10 52:17 54:7 94:16 100:16 106:7 107:2 140:3 257:14 374:17 386:8 388:22 pleased 102:7 314:16 363:18 pleasure 41:1 | plenty 48:20 106:5 118:19 pockets 319:10 podium 45:14 50:7 59:7 69:2 87:21 92:1 94:21 98:4 191:20 323:4 point 23:7,18,22 24:1,3 25:3 26:1 29:4,10 30:8 31:22 84:4,6,13 85:6 104:16 127:12 131:15,19 137:1 139:2 141:2 142:7 153:6,11,16 183:20 187:9,19 190:1,1 201:8 210:19 212:7,9 216:1 230:9 235:16 241:11 248:8 267:3 270:10 273:6 276:9 282:18 285:21 287:15 289:14 295:10 298:20 311:22 330:1,2 334:11 337:19 350:6 356:16 379:18 385:2 pointed 163:4 256:12 332:20 334:17 352:19 points 25:19 134:10 142:14,22 143:1 151:3 152:10 223:3 348:17 377:15 poison 159:1 polarized 95:19 policies 209:3 policy 24:7 26:12 27:11 28:13 31:10 34:9 60:2 69:5 76:14 77:12 78:3 78:7 91:14 126:15 127:2,7,15 129:1 | 129:8,11 130:4,6 130:8,9 131:12,16 132:1,6 134:20 135:11,12,21 136:2 141:8 148:2 149:4,13,19 164:4 164:8,14 166:6 251:21 252:11 253:3,3,4 257:8 260:1 293:17,18 293:21 294:1 311:6 360:9 377:22 379:9,11 379:17 380:11,16 Policy/Procedure 380:15 political 309:3 politics 96:2 Pollan 51:8 pollinate 47:3 polling 193:10 Pollution 206:5 Poly 92:7 polyethylene 100:4 polyoxin 3:24 228:21 229:5 230:4 235:21 237:15 243:20 polysorbate 61:7 pome 99:16 Pomona 92:7 poor 365:3 population 232:8 243:14 298:6 populations 244:5 pork 375:2 portion 25:20 27:7 150:16,17 302:19 332:12 377:19 portions 55:6 130:8 344:4 Portland 1:12,13 pose 195:5 poses 322:6 position 264:13 270:16 271:8 274:19 277:10 | 300:1,4,6 positions 274:20 315:14 positive 70:15 111:2 242:3 280:4 357:14 positively 194:12 possibility 22:16 81:9 82:3 256:10 332:4 possible 24:9,12 77:22 81:5 89:22 94:13 193:16 201:10 304:15 371:17 possibly 6:19 62:10 118:21 164:8 264:4 275:11 post 37:9 posted 8:20 16:17 217:13 poster 43:16 posting 32:20 pot 162:11 potassium 175:12 383:5 potential 10:22 238:17 375:8,21 potentially 34:2 72:13 118:17 146:18 304:22 305:4 308:12 344:13 357:14 369:20 poultry 374:6 375:2 pound 318:22 Powder 243:21 power 72:8 93:12 309:3 powerful 47:11 PowerPoint 18:2 PowerPoints 217:11 practical 91:16 299:15 352:20 practice 34:9 60:12 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 176:1 244:11 307:1 341:19 practiced 223:20 practices 74:21 84:1 89:7 100:11 177:13 233:3,9 244:2 272:4,8 275:22 280:3 293:3 294:17 321:14,15 341:6 347:1 353:12 pragmatic 293:12 368:10 pray 319:21 precautionary 45:5 precede 342:1 preceded 312:5 precedent 360:10 363:1 365:3 367:8 precise 161:1 predicable 312:17 312:21 predict 330:18 predictive 346:7 preemptive 242:10 246:2 prefaced 264:10 prefer 49:15 297:11 300:6 preferable 12:17 238:15 preparation 138:15 preparations 368:2 prepare 305:7 prepared 20:10 106:14 220:7 226:11 227:21 236:17 310:20 340:12 preparing 209:13 prescribes 93:11 prescriptive 348:2 348:14 353:16 389:2 presence 38:13 present 1:15 2:10 98:14 99:7 108:9 | 138:16 159:15 178:14 188:21 193:2 378:4 presentation 3:4,17 5:15 183:19,22 191:7 217:12 334:7 presentations 19:5 presented 102:9 133:3 244:15 252:6,13 271:8 372:9 presenter 36:11 presenters 233:15 presenting 335:14 presently 320:17 preservative 60:14 80:14 preservatives 81:21 82:1 155:10 261:20 preserve 72:8 preserved 306:9 President 390:19 presiding 1:14 pressure 66:9,16 presumably 148:2 256:8 presume 140:10 presumption 163:20 274:12 pretty 118:13 168:20 187:12 232:5 239:16 259:2 279:20 283:19 334:17 350:21 376:20 prevent 346:12 prevention 206:5 347:5 353:14 371:20 prevents 182:4 199:17 previous 59:17 152:9 210:15 298:4,8 303:22 312:8 340:14 | 385:3 386:22 previously 207:2,5 212:22 370:18 pre-meeting 18:7 136:16 price 319:1 pride 289:20 primary 15:3 243:17 379:16 principal 172:19 principle 45:5 principles 42:16 54:3 337:17 392:9 prior 195:20 242:8 242:11 249:3 288:22 291:11 priorities 368:9 378:5,8 prioritize 309:1 priority 276:20 340:20 341:4 private 39:7 privileged 327:8 prize 36:10 pro 19:6 probably 8:2 30:17 30:22 62:22 195:21 213:10 214:12 239:17 256:17 281:10 294:11 306:15 352:4 363:8 376:10 problem 63:12 64:4 70:20 71:3 87:6 149:20 193:10 233:20 244:9 285:3 289:8 293:22 325:19 362:3 363:2 problematic 140:1 238:17 problems 33:19 138:6 304:10 348:8 351:10 352:8 procedural 132:6 | 225:14 262:12 362:21 procedure 21:20 24:20 25:3 27:11 30:8 102:19 104:13 132:1 134:21 135:22 253:4 360:5 379:18 procedures 20:19 25:4,7 30:6 103:1 136:3 209:3 346:12 proceed 102:16 109:12 111:6 113:16 115:1 116:13 120:22 122:6 123:12 197:7 247:1 250:3 252:15 253:9 371:6 372:11 386:14 389:8 proceeding 211:8 process 9:18 15:2 20:22 22:15,20 29:9 30:4 33:8,12 33:21 34:16,20 54:21 73:12 75:15 77:1,2 79:14 84:2 91:5 94:8,13 96:9 96:15,16,17 97:9 134:16 140:16 146:9 147:17,21 149:1 153:7 158:13 186:11 209:19 212:9 216:16,19 229:9 229:19 244:14 252:3 260:17 266:8 273:17 277:12,12 279:13 281:7 285:19 286:1 298:10 308:17 311:4 326:15 327:6,9 328:16 331:1 333:16 336:12 | 351:22 354:2 360:5 362:5,6 363:4 365:2 369:4 377:14,18 392:13 processed 61:8 62:1 97:4,15 155:16 165:20 166:17 178:18,21 179:1 processes 32:19 84:22 91:9 104:12 130:19 284:17 processing 53:11 57:6 102:17 136:20 137:15 140:21,22 143:4 143:10,11 144:5,7 144:9 155:22 173:16 182:1,4 183:6 199:17 222:2 processor 188:11 188:18 189:1 processors 51:6 144:16 145:3 188:7 189:7 334:19 351:16 produce 83:12 143:12 produced 31:8 59:20 70:7 90:2 171:13,15 173:4 173:12 345:12 producer 68:14 74:7 277:5 279:22 300:5,11 producers 71:1 72:11 86:5 207:8 207:9 296:6,10,15 296:16,20,22 301:9,12 302:6,7 302:9 334:19 366:5 producing 221:5 product 11:1 14:9 24:6 44:3,16 45:3 51:9 52:11 55:2 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 59:19 62:8,10 67:11 70:11 113:2 113:6 118:13 138:16,17 143:15 143:17 144:14 146:10,12 154:2 155:21 156:1,4,4 156:6 165:20 166:17 171:16 172:3,7,8,16,17 172:18 173:2,10 173:13 176:5,7 179:3 180:13,22 181:5,21 182:3,5 182:6,10 185:4,6 185:13 188:2 199:12,16,18 200:9 221:21 230:22 231:8,10 233:17 243:20 248:11 266:21 303:6 346:13,14 370:5 production 10:4 19:2 28:12 37:15 37:19 43:19 48:19 53:16 59:16 70:6 70:17 74:14 90:6 97:7 137:12 147:12 181:6 194:5 195:7,9 206:9 207:11,12 211:13 212:11,13 213:4 214:5,19 215:14 237:18 260:4 271:22 278:6 289:1 319:17 320:2 321:21 322:4 324:7 326:7 344:18 361:20 378:1 384:8 productively 168:18 products 52:15 57:4 61:5,17 83:14 88:12 90:11 | 93:17 95:16 97:5 99:1,9,14,21 100:21 104:6 108:12,21 112:21 118:1 145:9 156:19 169:12,21 170:4 173:3 178:1 180:10,12 183:4 184:6,12 190:14 190:16 200:5 207:7 208:20 213:3 216:3,4 244:8 257:6 278:14 286:21 291:22 292:20 309:2,17 321:8 323:14 349:18 professor 232:17 profound 6:8 program 1:3 2:13 2:17,19 7:5,14 19:17 65:9,22 88:2,9 102:2 130:3 151:5,12 169:7 187:3 190:11 199:7,8 200:18 201:7 205:17 206:2 209:16 215:10 217:3 258:19 262:8 266:11,13 301:4 306:13 344:10 345:1,10 345:18 346:2 351:3 354:10,21 358:7 360:5,21 361:2 362:7,22 365:4 366:2,4 368:9 369:15,18 379:4 380:8,22 383:8,12 386:5 390:22 programmatically 357:10 programs 17:6 210:18 362:2 Program's 353:21 | 359:3 384:7 progress 40:19,21 85:1 126:10 205:15 213:18 266:13 288:8,14 290:13 298:5 304:18 307:4 327:16,20 prohibit 56:10 prohibited 24:3 38:20 55:5,11 56:5 81:7 82:12 82:15,21 105:1,12 194:11,20 344:21 345:6,8 prohibition 296:8 prohibitions 26:6 55:16 82:8 project 22:9 167:18 378:10 promises 290:4,16 promising 307:3 327:15 375:9 promote 90:13 promoting 375:10 promptly 106:8 pronounce 15:21 235:8 pronunciation 36:1 propagation 248:3 propagator 249:20 prophylactic 242:6 proportions 160:8 proposal 15:10 19:15,22 20:9 21:1 23:9,18 25:6 26:15 31:13 65:17 88:5 89:21 90:19 91:13,15,15 94:2 94:15 95:4 96:7,7 96:22 97:22 102:6 102:13 103:10 105:17 107:8 112:9 124:13 126:5 132:20,21 133:2,3,15 145:15 150:19 166:5 | 169:10 183:22 190:8 217:21 218:6 246:10 260:15 271:15 280:7 300:8 305:16,20,21 306:3 310:5 326:17 327:19 347:3 348:21 369:21 371:8,17 374:6 376:2,18 proposals 3:5,18 368:3 Proposals/Final 3:23 propose 105:7 171:9 198:7,21 255:14,17 256:13 306:21 proposed 19:12 21:6 77:12 92:18 92:20,21 107:14 133:11 171:8 209:14 216:12 299:16 306:20 310:16 330:14 340:16 372:3 374:9 proposes 174:8 175:10 176:19 344:8 proposing 20:13 173:17 275:5 proposition 53:22 propylene 61:9 protect 48:1 52:22 316:8 318:12 320:1 335:16 337:3 338:11 protecting 337:1 protection 316:9 protein-based 220:16 protest 318:13 protocols 279:5 proud 277:13 290:20,21 293:14 | 337:20,22 393:3 prove 5:11 37:13 proven 331:3 proverbial 99:19 provide 10:8 103:4 105:18 165:17 166:1,5 169:22 177:18 178:1 180:1 181:3 188:18 201:15 206:10 222:7 229:21 321:6 334:9 349:22 350:7 360:16 362:6,17 369:15 390:12 provided 26:2 105:15 174:6,10 177:10 307:5 335:6 345:6 Providence 209:2 314:17 provides 91:16 96:8 providing 175:5 362:15 377:2 381:1 provision 152:13 354:5 355:20 366:9 383:19 384:7 provisions 56:10 344:17 prune 337:3 pruning 337:1 psyllid 356:4,5,14 public 3:7,20 7:21 8:21 10:6 11:6 12:7,9 14:18 16:18 23:8 25:11 25:12,20 28:5,16 29:5,12,16 30:9 32:10,10,21 35:17 36:11 43:5 46:2,4 66:21 79:15,21 93:12,22 97:1 106:2 112:19 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|---------------------------|---------------------------|----------------------------|----------------------------|----------------------------|
| 134:15 164:10 | put 12:12 20:13 | 101:13 103:12,15 | quote/unquote | 197:5,7 228:20 |
| 169:19 174:15 | 27:8 29:11 66:12 | 105:5 119:13 | 126:19 182:17 | 229:4 244:21 |
| 183:15 191:12 | 74:17 75:12 81:11 | 126:22 128:1 | | 265:9,12,16 |
| 196:11 205:15 | 82:17 84:20 104:7 | 135:1 139:2 | R | 274:16 292:14 |
| 207:18 209:18 | 106:19 107:1 | 141:14,18 144:4 | rabbit 311:20 | 339:3 368:16 |
| 211:8,11,16,21 | 125:14 127:20 | 146:2 154:4,17 | 312:1 326:20 | 381:14 |
| 212:3,10 215:19 | 129:10 164:12 | 161:14 189:12 | radar 210:1 | real 39:13 51:10,11 |
| 217:13 219:1 | 166:12 169:19,22 | 199:9 200:17 | radiation 89:18 | 118:14 300:16 |
| 222:13 266:22 | 179:15 187:14 | 220:12 232:9 | raise 191:22 317:11 | 305:22 306:2,17 |
| 293:22 295:15,17 | 188:6 197:13,22 | 235:13 238:2 | 318:4 | 308:12 325:19 |
| 298:13 314:9 | 242:11 251:19 | 262:11,12 313:12 | raised 21:16 | 336:2 |
| 322:2 362:4 364:4 | 263:10 266:19 | 324:9 326:6,7 | raises 347:19 | realistic 331:14,18 |
| 371:4,7 376:15 | 271:9 288:5,19 | 330:5 367:1 | raising 29:20 | realistically 283:1 |
| publicly 43:12 | 289:4,9 318:7 | questioning 29:14 | 315:19 388:11 | reality 66:18 |
| publish 21:10 | 329:3 336:16 | 154:7 | ranches 350:15 | 173:20 331:17 |
| 211:4,7 | 340:21 356:20 | questions 11:2,4,7 | range 25:18 239:18 | realize 5:20 21:19 |
| published 102:20 | 357:5,9 360:22 | 11:18 13:18 14:5 | 296:8 | 62:2 68:10 158:1 |
| 133:2 174:21 | 363:12 364:4 | 15:16 17:13 21:1 | rapid 354:12 | 270:1 365:13 |
| 207:21 211:3 | 365:9 367:20 | 21:7,11 28:3 33:1 | rapidly 322:9 | really 9:18,22 20:6 |
| 212:6,19 | 368:13 374:21 | 34:6 39:20 45:11 | rate 297:7 | 24:21 40:7 48:21 |
| pull 18:1 232:3 | 375:12 376:3 | 50:4 54:11 72:18 | rationale 218:20 | 57:16 58:4,15 |
| 291:10,16 358:4 | 380:15 | 90:20 91:19 94:16 | 240:19 | 68:1,3,3 96:16 |
| 367:19 374:16 | puts 118:14 131:7 | 94:18 98:3 113:8 | raw 182:12,20 | 102:2 105:3 |
| pulled 138:13 | putting 78:4 82:5 | 138:9 183:21 | Raymond 192:1 | 113:11 117:22 |
| pulling 249:7 | 156:19 181:14 | 190:21 196:7 | reach 221:19 283:5 | 125:7 129:8 132:4 |
| pulp 17:2 | 196:2 249:9 252:5 | 202:2 216:21 | 309:22 333:5 | 138:3 159:10 |
| purchase 52:8,11 | 317:20 337:6 | 219:18 220:10 | reaction 132:17 | 178:11 181:8 |
| purchased 61:19 | P-R-O-C-E-E-D-... | 222:18 230:11,13 | read 5:22 46:1 | 211:1 212:8,13 |
| purchasing 317:21 | 5:1 | 230:15 231:16 | 52:17 87:4 131:3 | 214:20 216:1 |
| puree 196:4 | p.m 203:14 204:2 | 243:5 244:18 | 159:13 163:17 | 231:11 240:3 |
| purest 338:1 | 269:14,15 359:14 | 273:22 277:3 | 171:5,11 193:17 | 241:11 242:22,22 |
| purity 371:1,9 | 359:15 393:6 | 292:3 330:12 | 197:10 200:6 | 243:3 246:5 |
| purpose 60:7,10 | Q | 354:7 369:7 370:9 | 217:21 223:17 | 263:10 274:19 |
| 139:15 141:5 | qualities 12:16 | 372:15 373:20 | 253:5 256:21,22 | 275:12 280:18 |
| 153:14 169:18 | 56:21 | 378:18 381:11 | 305:8,13 320:9 | 285:14 292:5 |
| 198:2 205:13 | quantification | 383:20 | 344:3,4 347:2 | 299:19 300:1,19 |
| 248:2 | 275:22 | quick 102:3 190:22 | 360:12 366:18 | 301:7,22 302:4,22 |
| purposely 140:8 | quantities 89:15 | 191:21 | 370:17 388:20 | 308:3,20 311:14 |
| purposes 27:3 | 90:5,10 | quickly 357:5 | readily 183:10 | 313:13,13 314:3 |
| 28:15 32:5 137:16 | quarter 52:10 | quite 5:5 55:8 80:9 | 249:12 | 314:16,22 315:6 |
| 185:14 198:5 | 53:21 | 94:2 165:6 185:8 | reading 58:17 | 315:15 316:12 |
| 235:18 | question 21:2 32:4 | 234:12 277:8 | 126:12 176:18 | 320:5 321:16 |
| pursue 199:3 | 43:22 44:13,19 | 281:3 284:13,14 | 198:16 223:14 | 324:7 325:9 |
| purview 153:12,13 | 54:13 55:8 58:11 | 284:20 301:11 | 259:9 | 327:14,15,18 |
| push 125:4 | 61:4 65:8 73:3 | 306:15 312:17 | reads 135:11 | 330:15,16,18 |
| pushed 7:11 321:16 | 74:12 76:21 100:2 | 363:11 369:5 | 248:14 | 331:4 332:18 |
| pushing 124:15 | | 371:10 376:3 | ready 8:3 177:3 | 333:9,13 341:7 |

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 348:13,15 351:21 352:3,6 354:3,19 362:12 375:7 376:6,7,14 382:18 383:8 391:21 392:4,8,11 real-time 278:22 reason 29:20 37:5 38:13 40:9 48:2 69:21 70:4 75:20 81:16 137:17 139:10 275:17 310:4 317:7 324:18 reasonable 95:20 175:7 333:16,16 reasons 9:14 48:5 55:11 56:5,6 97:21 280:5 308:12 318:6 325:20 327:10 reassess 216:17 reassessment 207:22 reassure 310:2 recall 138:18 170:10 recalling 254:8 receive 37:20 215:19 258:18 371:3,15 received 10:6 16:5 18:18 29:16 78:2 174:15 181:16 208:17 213:5 230:2 371:12 recessed 203:13 recipes 155:4 recognize 120:8,11 153:22 178:8 205:22 322:12 392:15 recognized 17:5 recognizes 391:16 recollection 138:19 recommend 161:2 176:14 178:11 | recommendation 19:11 27:5,18 42:3,18 71:21 102:8,22 106:20 110:15 134:22 135:16 142:5,6 150:12,17,20 151:7,8,9,14,15 151:17,19 152:1 155:3 168:8 169:14 171:7 173:22 175:10,19 176:15 178:18 179:8,14,18 181:15,18 182:12 190:5 191:8 203:2 209:2,5 211:6,10 213:15 214:8 215:3,9,16 216:11 216:13 218:5 225:17 253:3 254:18 298:4 322:13 346:21 353:9 354:21 355:3 358:14,19 360:20 369:3 recommendations 19:12 33:15 34:12 89:6 141:8 151:16 152:4 157:17 170:19 171:2,5 177:8 181:10 197:11 204:16 209:8 213:17 368:3 379:7 recommended 33:7 129:22 169:15 175:18 179:16 209:12 recommending 150:22 recommends 47:18 183:1 271:17 344:9,16 353:11 358:10 reconcile 103:20 reconsideration | 249:15 reconstituted 172:20 190:14 reconvene 203:13 record 16:2 36:12 106:10 120:20 134:2 151:20 171:5 248:21 251:8 262:16 266:18 267:22 269:14 320:8 359:15 361:14 363:9 364:10 385:6 388:10 393:6 records 99:12 312:4 recreational 17:1 red 36:8 38:17 39:3 39:10,13 174:16 175:22 180:8 183:15 192:9 196:13 redacted 9:17 10:10 redefine 84:22 redo 379:19 reduce 38:8 189:6 318:11 376:8 reducing 378:21 reductionist 328:19 redundant 199:7 refer 26:14 29:4 200:2,4 reference 136:18 136:20 138:1 144:17 148:14 152:5 referenced 136:21 139:7,10 references 136:22 239:7 referencing 137:19 referred 315:10,17 355:19 referring 77:11 244:4 246:11 | refers 25:3 refine 157:8 168:12 213:20 266:21 refinement 21:21 157:21 refining 157:2 reflect 20:22 170:5 175:4 254:14 385:6 reflected 298:9,9 reflecting 173:19 reflection 119:10 reflects 266:18 reformulated 216:4 reformulation 215:22 216:6 refute 320:16 regard 10:12 29:2 29:7 31:6 66:15 81:7 254:17 regarding 10:7 20:6 40:16 44:5 59:14 60:2 91:2 200:17 209:18 211:21 231:16,20 362:2 regardless 70:11 156:3 276:11 regards 177:8 374:20 region 284:22 regions 243:3 register 212:2,8 214:1 330:21 registered 309:18 313:4 registration 278:14 regroup 379:12 regs 59:16 131:6 regulated 45:1 regulation 55:6 56:10 153:10 157:6 158:18 171:9 186:3 208:7 238:12 248:14 260:2,10 354:11 | 355:10,18 regulations 42:12 60:2 61:3 92:7 93:15 94:4 156:22 157:16 163:2 164:18 165:21 178:6 206:14 208:9,15 212:17 regulations.gov 46:3 52:19 regulatory 92:5 95:13 98:8 160:19 168:1 171:8 206:20 232:13 329:16 reinforces 199:1 reinspection 329:12 reiterate 119:17 reject 42:3,19 45:5 45:22 48:6 51:2 54:7 rejected 48:4 376:20 rejection 38:9 related 3:7,20 37:4 98:10 183:5 283:15 361:5 369:22 383:10 relates 173:22 222:16 relationship 234:5 relationship-buil... 391:20 relative 160:7 327:12 relatively 76:10 89:15 119:12 188:17 222:16 234:19 306:4 released 390:19 relevant 56:13 332:6 reliance 318:11 reliant 77:1 relief 300:17 relieve 297:1 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|---------------------------|----------------------------|--------------------------|----------------------------|----------------------------|
| relisting 34:13,13 | reports 39:15 | 329:14 345:3 | 340:13,16,19 | 243:18 312:21 |
| rely 314:12 | 93:20 165:18 | requires 71:18 | resolve 369:6 | 345:5,9 |
| remain 131:13 | 212:21 213:9 | 92:12 255:22 | 388:12 | resulting 9:21 |
| 300:13 | 214:7 216:15 | 257:2 387:19 | resonated 306:6 | 97:18 346:13 |
| remaining 179:2 | represent 34:8 80:6 | requiring 97:3 | resources 65:8 | results 39:9 61:12 |
| remains 162:9 | 86:22 277:7 | 189:14 | 96:21 187:16 | 92:22 155:2 291:4 |
| remarks 4:14 | 298:12 313:10,20 | reread 257:13 | respect 83:10 | 291:10 321:6 |
| 273:14 | 314:9 334:21 | research 39:9 | 305:14 320:5 | resumed 106:11 |
| remember 29:8 | 361:15 | 40:14 55:19 95:11 | respectfully 188:5 | 269:15 |
| 37:7 38:18 63:1 | representative | 178:7 184:16 | 361:14 364:10 | retail 293:16 369:3 |
| 270:7,9 281:3 | 39:11 | 222:14 276:20 | respecting 197:1 | 369:9 |
| 326:18,19 | represented 171:17 | 277:17,20 278:10 | respects 63:6 | retailer 323:7,15 |
| remind 36:4 61:15 | 302:17 345:11 | 278:18 279:7 | 125:22 262:14 | retailers 84:10 |
| 111:1 224:14 | representing 286:7 | 288:20 289:5 | respond 66:9 | 326:3 334:20 |
| reminded 295:8 | 311:8 313:22 | 294:6,7,8 296:20 | 280:21 | 369:8 |
| 327:1 378:18 | represents 19:1 | 299:5,10,14 | responded 209:7 | retain 319:14 |
| reminder 218:1,3 | reproductive 44:17 | 304:20 306:20 | respondents 52:7 | return 96:2 251:3 |
| Remote 331:17 | request 16:13 | 307:3 309:1 | responding 20:5 | returned 193:22 |
| remove 70:5 | 19:16 20:5 91:4 | 311:20 321:6 | response 6:21 | revert 97:18 |
| 195:12 271:18 | 178:20 211:20 | 340:21 341:5 | 11:17 14:5 19:15 | 298:14 |
| 308:10 332:19 | 212:3 384:5 | 375:11,18,22 | 158:20 202:4 | review 8:15 9:14 |
| 333:12 373:2 | requested 8:16 | 378:4,7 | 211:9 219:22 | 10:12 12:2,22 |
| removing 327:16 | 12:3 14:13 37:22 | researcher 294:10 | 222:19 224:12 | 14:12 16:12 20:10 |
| renders 43:15 | 113:12 180:3 | researchers 39:7 | 226:9 227:19 | 20:15 21:19 22:22 |
| rennet 60:7,11 | 209:16 257:7 | 47:10 289:6 307:5 | 236:15 244:19 | 23:3,20 24:22 |
| 80:15,18 81:2,8 | 259:22 321:12 | reservations | 265:7 274:1 | 25:4,17,19 26:3 |
| 81:18 | requesting 29:22 | 293:16 | 286:11 292:4 | 27:3 28:14,16 |
| rep 337:21 | 33:13 296:16 | resident 192:12 | 339:1 372:22 | 30:4 31:7 32:7 |
| repeat 38:4 46:4 | requests 8:10 11:19 | residuals 234:12 | 374:10 | 34:16 64:18,21 |
| 257:22 355:12 | 14:6 16:7 294:12 | residue 320:14 | responses 170:13 | 65:14 78:5 79:20 |
| 366:22 | 366:2 | 334:8 336:1 | responsibilities | 81:11,14,18 82:11 |
| repeated 174:22 | require 90:3 91:12 | residues 100:9 | 47:22 361:21 | 91:4 93:11 94:7 |
| repeatedly 243:15 | 93:7 97:5,8 | 291:4 320:11 | responsibility 73:7 | 96:8,10 98:11 |
| replace 180:5 | 129:20 175:3 | 335:8,11 | 74:19 75:7,10,11 | 100:18 102:15,21 |
| 238:17 | 176:1 210:6,8 | resistance 70:20 | 88:10 104:4 142:9 | 119:10 127:2,17 |
| replaced 26:1,5 | 346:2 | 234:17 239:10 | 362:11 | 129:22 140:16 |
| 179:17 | required 20:3 24:4 | 241:20 243:8,10 | responsibly-prod... | 141:3 145:18 |
| replacement 98:20 | 61:22 80:8 88:11 | 243:13 244:8 | 69:21 | 147:16 155:11,18 |
| 104:22 376:13 | 174:18 223:15 | 312:20,21 316:9 | rest 16:22 130:13 | 156:7 159:22,22 |
| report 8:18,18,19 | 297:1 330:21 | 322:7 325:19 | 159:3 275:16 | 161:19 164:5,10 |
| 9:11 10:3 12:5,5,6 | requirement 93:9 | 331:19 350:19 | 288:4 333:8 | 164:11 165:15,17 |
| 14:15,15,16 16:15 | 93:13 153:9 | resistant 244:2 | restrict 76:16 | 209:3,13,15,18,21 |
| 16:15,17 38:14 | requirements | resolution 40:10 | restriction 93:9 | 210:5 211:15,16 |
| 213:8,12 214:3,20 | 65:19 89:9,19 | 84:19 276:10,13 | restrictions 24:13 | 211:19 212:4 |
| 235:3 375:16 | 94:4 146:11,17 | 276:13,15,18 | 26:6 | 213:15 215:4 |
| 382:16 | 147:1,11,14,22 | 291:9 298:3 | restrictive 141:1 | 217:5 239:5,14 |
| reported 12:16 | 148:7,9 173:21 | 299:15,16 340:11 | result 164:14 184:6 | 253:5 262:2,3 |

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 354:2 377:14 379:17 reviewed 9:9 20:3 21:4 26:21 30:21 32:11,12 34:2 51:19 65:1 76:8 78:21 79:17 80:1 82:15 93:20 94:5 94:6 104:7 126:21 140:16 147:13 148:3,6,6 149:7 153:6 166:11,13 212:15 214:10 349:4 reviewer 43:5 reviewing 22:20 28:10 62:19 78:19 102:16 153:21 156:17 reviews 20:18 22:17 23:4,12,14 29:22 33:14 103:8 158:20 215:7,21 216:2 311:18 revise 18:16 125:4 revised 14:4 18:3 20:22 22:10 103:1 218:5 252:5,12 305:20,22 revisions 19:10,22 252:7 revisited 67:18 rewarding 392:4 rework 362:13 rewrite 366:21 Rhode 38:18 rich 49:5 Richard 10:14 Richardson 1:22 6:3 109:22 110:19 111:11 112:13 113:21 114:18 115:10 117:8 121:15 122:21 123:9 124:4 132:3 162:7 169:13,17 184:9 185:9,20 | 188:4 189:19 197:9 198:7 201:1 202:18 225:4 226:5,21 228:8 237:3 245:6 247:8 250:8 268:10 320:4 339:9 341:11 343:15 347:14 353:5 366:18 384:22 386:9 390:3 ridiculed 87:18 right 7:7 11:9 15:18 17:15 31:17 35:12 36:9,21 39:21 41:14 50:5 56:5,17 62:15 64:2 65:12 70:18 71:2 77:8,9,14 80:13 83:2 98:3 107:4,7 109:11 111:3,5 112:7,10 113:15 116:4 117:11 119:17 120:21 121:19 123:12 125:9 127:6 131:7,9 134:11,14 135:8 140:20 146:13 148:3,18,21 149:15,17 150:6 154:4 162:8 166:16,19 167:5,9 175:21 191:21 204:8,17 205:9,22 217:16 223:22 251:5 254:10 256:13 257:21 258:8 265:3 269:10 276:22 287:21 299:1 313:6 316:15,17 317:8 319:1 325:13 326:10 334:12 337:6 338:21 339:13 342:19 348:19 | 356:8,11 357:2,15 364:2,14 365:1,17 372:13,17 380:5 380:14,20 381:12 381:20 383:22 385:1,13 387:2 388:3,17 rightfully 61:11 rights 335:17 rigorous 94:3 ringing 323:21 ripping 310:13 risk 101:5 195:6 322:6 324:4 risking 85:22 roach 229:17 road 138:7 278:13 robust 17:20 106:6 327:15 role 90:21 91:2 103:21,21 104:2 298:12 365:6 rookie 262:12 room 100:3 124:21 275:19 281:5 283:11 292:15 297:17 302:15 308:8 323:4 337:10 339:6 373:11 rooms 336:21 rootings 248:9 rootstock 350:19 Rosen 206:3 rotates 391:16 rotation 244:3 rotational 242:1 244:13 rotenone 38:17,20 40:16 290:10 rough 279:21 roulette 299:4 round 31:1 34:12 252:2 273:13 392:21 rounded 173:13 route 104:19 | routinely 53:20 rule 51:9 148:17 176:18 206:21 345:14 366:11 rulemaking 33:12 33:16,21 34:3 151:21 215:11 219:9 358:16 rules 20:18 131:6 194:8 310:11 ruminate 354:22 run 33:18 214:16 233:2 354:1 381:13 running 28:8 214:22 278:15 344:11 rushed 229:8 241:13 Russian 299:4 rust 38:17 39:3,10 39:13 R&D 95:13 <hr/> S <hr/> safe 44:21 69:20 70:3 195:20 safer 194:21 safety 43:13 51:20 335:4 349:22 350:7 351:3,6,19 360:1,16 390:12 Saint 89:3 sake 306:22 sales 97:4 salt 3:24 171:22 172:2,5,13,17 173:7,8 175:11 176:2,4 230:4 237:16 salt-excluded 175:9 sample 335:11 samples 291:5,11 335:7 sampling 334:8 336:1 sanitizers 27:15 | 181:22 sat 287:22 satisfactory 324:21 satisfy 323:18 save 275:16 379:3 saw 31:19 40:3 76:4 132:13 292:18 301:9 saying 28:18 55:19 56:8 57:16 58:9 75:9 78:7,9 80:4,9 80:10 81:10 85:20 86:6,8 87:3,5 126:13 129:9 131:10 135:21 162:19 166:10 199:22,22 219:14 252:22 258:13,14 262:17 279:17 282:8 286:20 294:4 301:1 307:12 322:22 357:6 364:11 says 28:13 51:10 79:10 80:14 98:5 127:1,6,17 142:15 154:5,7 157:13,22 171:10,12 172:11 175:22 179:20 189:1,2 196:1 199:11 210:10 218:9 240:2 261:13 263:19 276:19 308:14 341:1 361:22 scab 348:9 scale 286:20 scaling 331:14 scared 335:3 scenario 285:15 school 92:10 300:7 science 86:11,12 177:12 178:3 294:22 308:14 311:6,6,16 312:10 312:11 314:10,16 314:19 315:11,12 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 315:13 330:16 331:22 334:4 science-based 86:10 scientific 85:18 320:9 378:16 scientist 92:3 95:2 321:5 scientists 47:7 86:18,18 294:13 scion 350:20 scope 377:18 scraps 375:2 376:19 screen 107:2,8 127:16 172:9 175:21 180:8 270:22 344:1 368:20 380:5,19 screening 209:13 scroll 198:14 370:13 scrounging 311:19 scrutinizes 360:2 scrutiny 43:18 156:15 238:10 seal 71:7 266:22 270:5 search 314:10 season 365:14 seasons 365:18 seats 106:7 Seattle 40:12 59:12 159:8 277:11 281:2 287:22 288:3,17 seaweed 9:13,19 second 39:2 79:8 108:2,3 110:18,19 112:12,13 114:18 116:9 117:14,15 122:3 123:8,9 129:3 133:22 151:6 173:22 196:13 197:15,16 197:17 224:9,11 226:5,7 227:9,16 | 227:17 235:17 236:1,2 237:20,22 245:20 246:20 248:3,4 251:15 252:14 258:8 270:11 272:12,13 272:19 273:20 276:18,21 341:9 341:10,11 342:4 347:13,14 364:19 365:2 384:18,21 384:22 386:7,9,11 387:8 seconded 267:20 342:4 385:7 388:19 second 353:8 Secretary 5:9 295:12 345:17 346:1 362:1,7,9 362:16,19 363:2,3 363:5,7 384:6 section 8:11 11:20 14:7 16:8 26:10 27:12,14 43:1,7 89:11 98:13 123:6 129:5 130:5 132:6 134:20,21 135:22 135:22 137:3,6,7 150:12,13 151:17 152:6 174:1,20 175:20 176:10 207:10 223:4 226:1 251:21 355:10 384:9 sections 168:9 207:1 security 299:11 see 6:6 32:20 35:2 39:17 40:19 41:1 41:5,18 56:12,18 58:12 78:11,12 79:3 81:9 82:2 88:20 103:10 117:21 128:2,12 135:14 154:2 157:18 161:9,11 | 161:13 166:4 168:20 177:6,11 178:2 180:8 183:11 193:9 198:15 201:19 205:11 210:9 214:14,21 216:15 233:3 234:6,18 257:15 259:19 262:2,5 264:9 267:20 269:20 277:9,10 280:10 280:10,13 286:2 295:19 296:19 310:13 311:2,3 312:19 313:11 314:17 316:17 327:14 331:4,10 332:14 355:5 357:11 358:14 359:3 361:3 362:7 364:2 375:19 379:7 384:16 389:6 seed 46:14 371:1,9 seeing 116:13 122:6 134:19 183:16 219:19 247:1 269:6 317:1 386:13 seek 150:10 375:5 seeking 287:2 seen 99:15 158:19 288:10,11 322:20 323:1 segment 72:10 285:5 seldom 21:22 self-calculating 174:1,9 sell 49:13 248:15 287:5 289:17 297:9 346:17 semantics 135:20 send 163:5 291:8 358:3 364:12 377:16 | sending 88:22 170:18 191:4 311:20 378:13 sends 188:9 189:4 senesce 360:4 senior 192:18 sense 19:17 66:12 164:13 261:3 293:13 310:22 331:16 333:17 sensible 20:19 89:7 177:15 187:11 310:11 369:17 sensitive 57:3 sensitivities 50:12 50:14 sent 170:11 171:1 191:2 377:15 sentence 24:10 127:16 129:1 174:16 179:15,20 253:4 256:21,22 257:1 342:12 separate 27:14 33:17,21 34:4 90:11 104:12 132:2 separately 93:8,15 separation 349:8 September 11:15 14:3 sequester 41:12 series 209:12 serious 44:22 66:15 87:15 322:6,13 324:3 331:20 334:18 352:8 Seriously 274:2 serve 5:21 51:5 68:12 119:9 served 59:10 serves 251:6 SERVICE 1:3 services 369:14 session 5:4 7:10 35:22 106:13,20 191:13 204:4 | 374:1 set 38:19 39:1 77:19 185:21 246:15 270:19 setting 60:2 85:22 266:9 360:10 367:8 seven 13:15 15:15 17:9,11 183:17 291:5 335:7 374:8 sewage 89:19 shades 304:8 shakes 218:12 shame 306:17 share 96:4 195:17 316:21 331:6 381:9 391:17 392:2 shared 39:9 66:6 335:4 shareholders 316:12,13,14 336:9,10 361:6 sheet 188:20 204:19 sheets 78:12 178:20 179:9 189:3,5 sherry 3:10 41:19 45:14,15,18 192:2 373:6 Shistar 36:10 196:20 shock 73:20 shocked 315:8 324:5 shocks 327:2 shoppers 49:7 61:16,20 323:11 shopping 49:15 short 270:6 305:5 330:20 shorten 129:4,11 shortening 126:14 short-lasting 234:11 shout 350:1 show 19:10 84:22 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 163:7 288:8 290:12,18 showed 392:3 showing 40:18 134:15 154:8 288:13 291:4 325:5 336:1 shown 44:16 328:1 shows 47:14 193:11 shrink 306:16 sick 89:4 side 130:16 244:7 271:12 274:21,22 291:20 300:21 312:14 314:9 319:11 328:21 392:1,10,14 sides 83:19 299:21 300:5 307:13 sight 87:19 131:8 signed 35:21 191:11,16 328:7 significant 57:5 100:22 160:1 332:11 significantly 182:19 305:4 silicate 383:5 similar 40:9,15 64:20 65:3 292:17 376:12 similarity 174:13 similarly 172:11 311:3 simple 71:21 78:16 78:18 137:13,15 178:9 325:3 simplest 186:1 simplified 6:5 simply 100:22 159:21 172:5 174:21 353:8,10 353:15 363:1 sincere 327:21 single 13:7 49:13 75:12 78:20 93:5 96:14 136:22 | 178:19,21 179:3 179:15 180:11 182:4 199:17 200:8 213:10 215:1 single-digit 285:11 single-ingredient 182:13 single-strength 172:22 singling 19:9 sir 370:16 Sirkin 3:10 41:19 45:14,17,18 sit 66:19 77:13 287:15 336:4 348:21 site 8:20 12:8 14:17 16:18 178:13 183:2,9 217:14 sitting 100:3 270:2 281:4 287:21 319:1 336:21 337:20 situation 64:6,7,20 65:3 149:16 173:20 188:21 234:15 295:6 situations 63:8 six 22:21 30:16,17 203:5 215:4 245:21,21 257:16 258:7,7,12 312:1 340:4 374:8 Six-seventy-two 355:21 slaughterhouses 42:20 sledding 279:20 slide 207:16 slides 18:2,11 slightly 276:14 slow 58:5 98:6 339:12 362:20 slower 224:15 295:2 sludge 89:19 | slug 295:2 small 45:20 89:15 90:4,9 188:19 189:7 211:1 285:4 286:20 289:3 298:17 301:12 315:2 352:6 smaller 187:15,21 352:4,12 Smalley 294:5 Smucker 170:14 181:13 sniff 392:9 soda 51:21 sodium 51:21 60:8 60:9 61:7 175:12 383:4 soil 229:15 232:8 232:10,14 233:1,6 234:3 240:7,7,11 240:13,14 303:8,9 316:10 338:7 sold 170:4 171:16 193:13 300:12 345:11 352:10 sole 53:18 solicit 29:5 solid 71:11 173:4,6 329:15 solids 62:10 soluble 12:18 solution 71:1 78:6 78:17 193:9 286:15 solutions 289:7 solve 70:20 375:6 solved 304:11,11 solvents 157:13 somebody 68:4 74:18 223:15 somebody's 36:19 366:20 367:10 somewhat 25:22 139:16 152:14 161:1 188:7 350:7 son 318:18 song 22:1 | SONNABEND 1:23 17:22 18:15 28:20 30:7 31:12 32:13 62:17 108:10,19 109:16 109:19 111:9 112:16 114:11 115:22 117:6,19 118:11 121:13 122:19 124:2,17 125:2,13 127:8,12 128:4,6,21 129:12 132:11,16 133:14 134:3 135:15 136:5 142:11 143:5,8,16 144:10 144:18 145:22 146:5,7 149:11 154:20 159:20 160:18 161:11 202:16 225:2 226:19 228:6 234:2 237:1 245:4 247:6 250:6 252:4 252:17,21 253:18 254:3,7,12,15 255:6,11,18 259:15 261:8 264:2,7 265:2,5,8 265:11 267:3,6,14 267:17 268:1,22 274:6,18 307:20 340:1,15 341:22 342:7,11,15 343:13 347:18 356:3,6,9 357:17 365:12 377:11 384:3 390:1 soon 191:3 320:15 sorry 39:22 57:13 68:9 72:22 103:16 103:17 105:5 107:21 109:20 113:17 119:13 129:17,17 146:2 168:15 189:12 220:8,22 223:8 | 246:1 263:8 267:4 267:17 322:15 338:12 340:9,9,12 341:13 342:18 343:19 366:10 381:18 382:4 390:17 sort 64:20 74:11,16 118:17 129:11,21 134:11 147:16 168:11 171:4 184:19 185:10 188:6 190:4 196:9 204:18 208:3 214:16 221:15 222:2 228:21 233:21 253:14 263:7 269:8 285:14 311:4 312:2 313:21 315:7 341:15,20 349:9,20 363:10 368:15 369:4,6 sorts 375:8 sound 20:19 86:11 89:7 91:16 98:4 187:11 304:6 310:11 332:1,10 369:16 soundly 376:20 sounds 69:15 119:21 133:9 178:9 237:12 366:14 soup 177:2 source 52:6 90:16 147:4 230:20 231:4 289:19 349:8 sourced 48:12 sources 49:6 145:9 231:8 sourcing 89:16 154:22 Southern 95:6 242:21 294:6 Southwest 1:12 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| soy 177:2,22 | spend 88:14,21 125:11 | stalled 308:11 | 323:21 356:12 | 238:3 |
| spaniels 221:14 | spending 87:12 310:10 | stand 286:1 290:1 290:17 335:16 337:17 378:14 | 369:4 382:19 | stay 316:3 359:9 |
| spare 92:6 238:13 | spent 62:4 63:2 69:22 156:17 | standard 139:15 | starting 22:17 23:22 24:1 31:3,3 125:7 141:22 | stayed 269:19 |
| sparingly 296:18 329:9 | sphere 141:13 | 144:7 145:17 | 142:14 210:19 | steeped 314:19 |
| speak 35:21 48:6 98:17 273:5 286:8 | spinning 137:2 | 166:15 174:17 | 242:11 256:22 | stem 242:21 |
| speakers 241:16 | spoiling 57:11 | 175:22 177:21 | 283:14 320:16 | step 36:21 211:10 216:9 320:1 374:11 381:20 |
| speaking 95:15 196:12 282:17 299:20 300:7 | spoke 315:9 | 186:20 195:11 232:13 | 338:13 383:1,13 | Stephen 192:3 |
| spec 78:12 | spoken 63:15 66:7 | standardization 178:2 | stat 335:8 | steps 209:12 310:1 347:7 |
| special 37:17 90:20 284:10 | spot 313:6 363:21 | standards 1:6,11 2:16,18 28:17 56:14 65:18,21 81:15 126:21 127:18 128:13 137:21 148:4 158:12 164:12 178:4 219:12 220:19 281:1 335:9 341:2,17 | state 44:10 71:13 101:16 180:7 194:3 262:15 284:3,10,11 294:20 305:16 337:19 344:22 345:9 351:21 | step-down 376:2 |
| Specialist 2:14 | spouse 317:12 | 81:15 126:21 | 294:20 305:16 | stipulate 31:6 |
| species 243:18,19 | spray 300:15,16 301:10 355:19,22 356:10 366:9 384:7 386:12 | 127:18 128:13 | 337:19 344:22 | stipulation 89:22 |
| specific 18:19,21 26:5 53:15 55:22 60:10 75:12 79:12 80:22 81:2 177:7 178:12 284:19 324:18 352:20 367:4 | sprayed 346:11 | 137:21 148:4 | 345:9 351:21 | stock 248:9,12 |
| specifically 26:2 105:11 140:15 159:14 191:12 199:12 200:8 206:7 209:19 221:2,13,16 222:2 233:18 257:3,5 273:4 284:18 374:19 | spraying 356:12,13 | 158:12 164:12 | stated 29:13 96:20 234:14 272:17 282:4 308:3 380:12 | Stockwell's 334:7 |
| specification 178:20 179:9 188:20 189:3,5 | sprays 193:6 | 178:4 219:12 | statement 129:21 130:10 160:15 275:11 280:14 305:8 309:5 310:20 336:5 376:21 | stone 1:13,16 5:3 5:19 7:3 35:14 36:16,20 39:19 41:3,11,14,17 45:10 50:3 54:10 59:6 62:15 64:9 68:17,21 69:1 72:17 77:9 83:2 87:20 91:18,22 94:17,20 98:2 101:9 103:11,17 105:21 106:12,18 108:15 109:13 110:11,22 111:7 112:1,4 113:18 114:12 115:3,8 116:2,10,15 117:9 121:1,17 122:8 123:2,14 124:8 125:9,21 128:16 130:14 131:22 132:10 133:18 136:9 138:10 141:11,17 142:4 143:14 144:2 150:2,6 151:4 152:2,17 153:4 154:3,10 155:12 156:13 157:12 159:12 160:11 161:9,15 162:5,17 |
| specified 28:12 60:6 171:18 181:19 | spread 23:5 | 220:19 281:1 | statements 59:17 170:21 375:4,12 | |
| specifies 104:18 257:8,10 | spring 215:8 380:3 383:3 | 335:9 341:2,17 | states 1:2 20:9 53:17 56:1 60:4 80:21 92:16 174:2 264:5 294:21 299:1 362:13 | |
| spectrum 231:20 239:4,13 322:11 | SQF1000 351:3 352:1 | standing 10:11 318:20 | statement 129:21 130:10 160:15 275:11 280:14 305:8 309:5 310:20 336:5 376:21 | |
| spectrums 85:11 | square 104:3 | stand-alone 351:13 | statements 59:17 170:21 375:4,12 | |
| speed 278:14 | stabilizer 60:14 | start 5:8 7:5 18:4 21:12,21 82:5 99:6 112:17 125:15 126:2 137:8,10,19 150:20 162:11 191:4 252:22 262:2 268:8 274:12,17 277:12 280:18 285:5 291:9,12 292:17 311:15 322:22 339:7 343:1 347:19 383:6,9,9 389:11 | states 1:2 20:9 53:17 56:1 60:4 80:21 92:16 174:2 264:5 294:21 299:1 362:13 | |
| spell 260:14 | stabilizers 62:12 | 274:12,17 277:12 | stating 159:14 | |
| spelled 164:22 342:19 | staff 2:10 349:4,4 355:16 379:3 392:16 | 280:18 285:5 | station 38:9 277:20 | |
| | stage 159:2 346:9 | 291:9,12 292:17 | stations 279:8 | |
| | stake 305:12 316:19,19 317:4 | 311:15 322:22 | status 345:4 372:20 | |
| | stakeholder 277:6 288:6 | 339:7 343:1 | statute 128:14 137:9 314:2,3 361:19 362:11 364:6 | |
| | stakeholders 39:11 83:20 84:9,21 85:10 91:6,17 94:10 131:17 235:2 271:11 287:17,19 290:2,8 290:16,19 294:17 295:1 323:17 325:22 326:3 334:3 335:19 336:8,11 376:15 | 347:19 383:6,9,9 389:11 | statutes 137:22,22 138:4 139:11,14 | |
| | | started 63:13 270:12 280:22 282:7,9 288:21 312:7 318:7 | statutory 232:12 367:6 | |
| | | | statutory-ness | |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 163:9,22 164:15 168:4,22 186:9 191:9 196:6,19 197:4 202:7 203:1 204:3,8,10 205:4 216:21 217:8,15 217:18 218:10,21 220:5,22 222:8 223:6,17,20 224:7 224:13 225:10 226:12 227:6,13 227:22 228:16 230:18,20 235:14 236:7,11,18 237:12 244:22 245:16,20 246:4 247:3,19 248:8 250:4,20 251:5 252:15,19 254:20 255:3,8 258:10,22 262:4 264:11 265:14,18 266:9 266:10 267:5,11 267:15,19 268:3 269:1,6,16 272:11 272:22 274:11 292:16 297:18 339:4,12 340:3 341:12 342:18 343:16 349:5 354:8 358:20 359:16 364:16 365:11,19 366:20 367:9,14 370:8 372:13 373:19 377:6 378:17 381:10,16,22 382:3 383:16,20 384:15 385:1,10 386:10 387:7 388:3,7,13,17,21 389:5 390:5 391:12 393:1 stood 242:22 325:3 stop 36:6,9,19 69:10 154:11 168:9 192:6,9 | 238:22 273:9 312:16 353:9 stopped 196:13,22 stopping 196:21 stops 362:6 storage 53:4 57:7 store 95:11 318:20 stored 57:8,9 story 46:18 47:5 307:14 318:5 straight 246:14 strategically 329:9 strategies 347:8 strategizing 281:22 strategy 365:6 371:20 stream 13:1 156:3 street 325:8 strengthen 24:8 strengthens 217:6 streptomycin 282:19 382:8 stressors 232:22 strict 279:4 strictly 240:22 strike 257:15 258:6 stripe 328:21 strives 85:2 striving 85:5,5 strong 43:13 177:12 178:3 258:22 317:5 392:12 stronger 296:2 strongly 46:7 49:19 52:14 90:2 91:4 91:14 94:1 97:21 131:10 183:8 299:22 341:4 Stroub 192:1 struck 154:18 structural 91:12 structure 166:6 structured 103:3 354:17 structures 349:20 struggling 376:9,14 | stuck 130:21 studies 44:15 45:2 229:22 307:7 study 47:14 229:17 229:19 371:10 375:22 studying 47:7 stuff 154:22 191:4 348:3 350:22 352:19 355:1 stunned 193:5 sub 141:6 231:10 322:2 Subcommittee 3:4 3:5,8,17,17,20 4:12 7:8 8:16 12:3 13:15 14:6 14:13 16:13 26:13 44:9,12,18 46:9 47:17 120:10,19 124:11 132:22 161:22 169:6 174:8 183:17 201:11 218:16 230:1,5 231:14 252:8,12 270:16 271:3,17 280:6 329:20 344:7 369:1 372:10 374:4 378:9 379:11,22 380:1 380:12 Subcommittees 368:4 Subcommittee's 42:18 subheading 127:15 132:2 subject 27:5 93:21 103:2 156:7 164:11 210:5 360:22 380:9 subjects 11:7 submit 25:12 30:20 38:14 92:20 96:11 113:5 submitted 11:14 | 14:2 16:6 37:16 37:22 46:2 52:18 98:15 132:22 181:6 submitting 39:15 101:10 subset 211:1 substance 8:8,12 10:1,4,12 16:2,8 21:4,5 22:7 24:6 30:1,2 38:6 42:15 74:15 91:1 96:14 108:1 138:15 140:17 141:4 215:1 237:17 261:10,17 312:9 344:21 345:6,8 substances 7:16 15:19 17:16 18:10 18:12 20:11 22:4 27:2 28:11 29:7 29:17 34:1 78:20 92:14,17 93:2 94:7 97:6,7,13,14 100:2 102:6,18,21 103:5 106:19 129:19 141:9 142:13 143:9 149:2 165:15 167:8,12,13,17,19 213:11,17 214:11 214:18 252:10 253:6 259:10 260:11,12,16,21 271:21 373:14 substances-other 124:12 166:2 substances/other 253:16 substantiates 181:4 substantive 126:16 249:11 substrate 73:11 subtleties 370:2 success 60:18,22 279:13 309:8,11 successful 280:1 | successive 243:16 succinct-ifying 367:10 sudden 195:22 suffering 297:2 sufficient 341:21 sufficiently 331:21 sugar 7:18 13:21 14:2,3,7,9 15:2,4 15:7 46:1,10,12 46:14 47:18,20 48:3,8,12,15 70:6 116:5,7 117:12,13 118:16 119:3 179:4 suggest 45:3 126:13 175:17 244:3 253:21 254:2 256:21 266:10 273:4,16 353:6 358:21 suggested 103:22 170:11,19 265:5 267:9 suggesting 131:14 190:4 279:10 suggestion 96:13 175:7 281:7 358:17 suggestions 19:7,21 135:3 348:11 suggests 354:20 358:12 sulfate 175:14 sulfonate 382:10 sulfur 234:9,11 sulfuric 7:17 8:3,7 8:10 9:10,11 42:4 42:4,9,14 107:1 107:14 108:1,17 109:10 110:13,15 Sulfurous 383:4 sulfuryl 53:8 Summarization 3:5 3:18 summarized 15:9 summarizes 27:19 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|---------------------------------------------------|----------------------------|----------------------------|---------------------------|-----------------------------|
| summary 12:14 107:13 246:13 375:4,12 | 316:4 | switching 43:17 | 387:19 392:14 | 302:21 303:9,9 |
| summer 361:1 | supposed 105:17 | swoop 379:21 | tables 287:21 | 306:10 334:2 |
| summit 39:3,8 | 267:8 342:16 | syntax 330:4 | take 17:20 18:6 | 350:16,21 365:16 |
| sunset 22:15,19 | sure 16:1 40:4 64:7 | synthetic 9:21 17:9 | 22:4 27:13 28:21 | 372:7 |
| 23:5 29:9 33:5,7 | 67:6,7 77:20 | 42:15 45:1 50:11 | 30:15 68:6 96:18 | talks 139:6,9 |
| 33:10,18 34:3,11 | 78:13 79:5 82:18 | 50:15 58:1 60:5,9 | 127:19 129:5,14 | tally 224:17 |
| 34:16 65:14 94:7 | 88:10 104:13 | 60:13 62:12,13 | 130:15 150:3 | targeted 233:18 |
| 96:10 130:1 | 107:10 119:18 | 81:20 82:1 108:1 | 163:18 189:16 | 243:17 |
| 215:12 368:5 | 127:11 128:7 | 109:18,20,20 | 196:21 200:18 | task 68:11 375:21 |
| 370:12 373:5 | 129:12 139:3 | 122:2 147:15,15 | 203:9 216:8 | tasty 296:13 |
| sunsets 383:4 | 141:20 142:7 | 157:13 207:4 | 218:16 235:10 | taurine 219:5,5 |
| super 284:7 | 149:19 168:18 | 219:5 221:7 | 242:11 261:2,9 | 220:4,19 221:10 |
| supervision 297:13 | 175:18 181:15 | 223:16 224:5 | 266:17 279:11,21 | 221:11 222:1,3,6 |
| supplement 12:15 | 189:13 192:5 | 230:5 231:7,13 | 288:14 289:6,20 | 222:11,16 224:3 |
| 14:22 | 195:19 224:16 | 235:22 237:17 | 290:13,17 291:8 | 225:17 227:10 |
| supplementary | 242:19 249:2 | 246:19 271:20 | 291:10,15 305:22 | TAYLOR 1:23 |
| 22:17 23:4 103:7 | 264:2 266:13,18 | 376:8 | 310:1,3 315:14 | 110:6 111:17 |
| supplements | 267:7 280:18 | synthetics 18:21 | 333:20 334:9 | 114:5 115:16 |
| 165:11 | 281:3 282:6 | 51:18 72:2 | 335:16 349:1 | 116:22 121:7 |
| supplied 211:14 | 285:13 286:13 | syrup 62:10 179:5 | 359:6 361:9 363:4 | 122:13 123:18 |
| supplier 147:8 | 302:22 303:2,12 | system 36:6 58:5 | 363:15 364:2 | 202:10 224:18 |
| suppliers 60:13,16 | 310:20 311:2 | 65:21 70:17 | 368:6 371:1,11,14 | 227:5 228:14 |
| 88:16 89:4 90:7 | 339:13 342:19 | 119:18 120:2 | taken 20:7 27:16 | 237:9 245:12 |
| 90:15 91:7 109:5 | 361:8 363:11 | 164:20 272:4 | 76:15 87:16 190:1 | 247:14 250:14 |
| 147:19 187:19 | 368:14 371:10 | 308:22 309:4 | 214:15 277:2 | 268:16 297:22 |
| 323:16 | 373:12 379:8 | 329:11,11,16 | 291:5 303:22 | 339:17 343:7 |
| supply 13:11 15:7 | surely 99:3 | 370:21,22 371:16 | 315:3 | 370:16 389:16 |
| 323:20 | surfaced 47:8 | 390:10 | takes 9:19 321:6 | teach 92:6 |
| support 8:15 12:2 | surprise 62:7 | systematically | talk 30:9 85:4 | teacher 294:10 |
| 14:12 16:12 19:17 | 327:18 | 165:13 | 137:14 253:13 | teaching 92:9 |
| 70:17 84:7 88:4,6 | surprisingly | systems 272:6 | 263:9 274:7,9 | team 88:14 |
| 90:13 91:14 94:1 | 114:22 329:17 | 346:20 | 287:6 296:4 317:2 | tears 336:17 |
| 95:3 97:22 105:22 | surrounding 6:7 | systems-based | 329:19 | teas 177:4 370:2 |
| 199:4 293:19 | surrounds 6:6 | 347:4 353:13 | talked 63:9 137:21 | technical 8:17 9:10 |
| 296:10,20 298:2 | survey 49:5 52:3 | S-E-S-S-I-O-N | 301:20 323:10,12 | 10:2 12:4 14:14 |
| 301:7,14 310:16 | 71:12 87:1 193:15 | 204:1 | 325:4,7 349:5 | 16:14,17 20:18 |
| 319:11,14,16 | 194:1 195:3 221:3 | <hr/> T <hr/> | 372:8 378:21 | 29:22 30:4 43:4 |
| 324:13,19 341:5 | 222:9 | table 106:21 | 379:2 380:20 | 93:2,11,20 103:8 |
| 365:10 | surveyed 49:7 | 108:18 205:22 | 383:8 | 139:6,20 143:7 |
| supported 120:14 | survival 326:11 | 250:1 251:16 | talking 32:5,6 | 159:16 165:17 |
| 170:20 | sustainability | 252:5 264:19 | 58:21 62:3 65:10 | 212:21 213:7,9,12 |
| supporting 119:14 | 37:19 | 273:8 302:15 | 68:2 69:10 83:17 | 214:3,19 216:15 |
| 170:21 181:3 | Suterra 98:9 | 307:17 336:11 | 135:8 137:4 149:3 | 239:5,13 311:18 |
| 333:17 | swaths 9:16 | 355:15 364:11 | 157:1 186:5 232:4 | 377:14,21 |
| supportive 181:13 | sweat 336:17 | 365:9 383:14 | 232:22 282:18,20 | technicalities 54:20 |
| | Sweden 118:14 | 385:4,11 387:18 | 283:3,6 285:4,6,8 | technically 223:6 |
| | swimming 373:22 | | 285:10,13 299:22 | 242:5 |

| | | | | |
|---------------------------|----------------------------|---------------------------|---------------------------|----------------------------|
| techniques 347:6,7 | 193:2,21 207:18 | 186:8 189:21 | 202:12 217:9 | 303:11 316:20 |
| tell 129:13 156:16 | 219:1 229:7,10 | 190:20 192:9 | 224:20 226:15 | 319:12,13 328:22 |
| 287:7 318:4 321:4 | 296:12 | 196:4,6,8,22 | 228:2 237:11,20 | 331:1 332:7,9 |
| 363:2 389:1 | testing 43:13 | 197:1 200:14 | 239:2 241:2,5 | 335:1 337:2 350:6 |
| telling 40:20 68:6 | 320:15 | 202:1 203:11 | 245:14 247:16 | 350:8 352:16,17 |
| 204:22 | tetracycline 3:26 | 205:5,9 216:20 | 250:16 268:18 | 354:1 359:10 |
| tells 70:3 82:9 | 40:5 83:7 85:8 | 217:3,7,16,18 | 299:18 339:19 | 380:6 391:7 |
| temperature 99:12 | 195:7 229:2 251:3 | 218:2 228:18 | 343:9 389:19 | 392:11 |
| 346:8 | 251:7 269:10 | 229:3 244:22 | thin 350:12 | think 8:2 9:6 27:19 |
| template 214:3 | 271:18 272:1,3 | 245:17,18 246:3 | thing 7:8 32:9 | 31:19 55:12,15 |
| temporary 350:20 | 282:17,19 285:7 | 248:5 250:22 | 49:19 70:18 71:2 | 57:20,21 58:14,17 |
| tend 313:9 329:3 | 324:14 327:17 | 251:2,4 264:19 | 79:8 133:20 145:1 | 63:11,12 65:15 |
| tendency 132:7 | 340:8 341:18 | 269:2,12 270:13 | 145:6 151:22 | 66:7 67:15,17,21 |
| 306:20 | 342:3,10 344:2,8 | 270:20 272:20 | 155:6 161:4 | 68:7,9 69:16 |
| tentative 209:14 | 345:15 346:15 | 273:18 280:15,17 | 167:15 197:10 | 73:13,19 78:4 |
| 211:5 | 365:13 366:6 | 303:16 307:19,20 | 199:22 231:19 | 83:10,11 85:2,3 |
| tentatively 379:15 | tetracyclines 322:1 | 333:17 339:5 | 240:14 241:11 | 85:13 87:9,14 |
| term 18:9 140:7,10 | text 254:13 | 347:17 353:4 | 254:1 270:3 278:2 | 102:2 106:13,22 |
| 140:18 151:9 | thank 5:17,19 7:3 | 368:18 372:13 | 283:7 301:18 | 109:12 113:15 |
| 159:9 248:10 | 7:15 8:6,22 9:1,8 | 377:11 378:16 | 302:22 311:12 | 118:14 120:9 |
| 270:6,6 305:5 | 11:9,13 12:11 | 379:10 381:9 | 316:18 318:1 | 124:14 125:2,11 |
| 360:22 361:1 | 14:1,19,20 16:19 | 383:17,22 388:9 | 319:5 326:10 | 125:17 126:8,15 |
| 379:1 | 16:20 17:15,22 | 390:7 393:4 | 337:11 338:21 | 128:1 130:18,21 |
| terminology 140:9 | 27:21 28:1,7 | thanks 12:10 35:14 | 349:21 350:18 | 131:1 132:3 134:1 |
| 206:16 | 31:17,20,20 32:21 | 40:1 58:19 103:12 | 362:9 364:15 | 135:4 138:13,22 |
| terms 24:9 65:20 | 34:5 39:17,19,21 | 103:14 105:20,21 | 367:16 376:6 | 143:22 150:20 |
| 73:7 134:20,21 | 40:21 41:14 45:8 | 105:22 119:16 | 379:20 383:7 | 151:11 152:12 |
| 150:11 159:5 | 45:10,12,15 50:1 | 169:5 190:1 191:6 | 389:7,10 | 153:11 154:16 |
| 201:12 216:9 | 50:3,5 54:8,10 | 191:9 205:8 | things 22:19 23:11 | 157:1,7,22 158:4 |
| 228:21 233:5 | 58:10 59:1,4,6,9 | 217:14 218:17,21 | 27:9 29:1 30:22 | 158:5,7,8 161:21 |
| 244:3 260:3,10 | 62:15,17 64:8,10 | 227:22 229:5 | 32:18 56:13,14,22 | 161:21 162:14 |
| 278:13 362:8 | 64:11,13 66:3 | 247:3 310:18 | 57:1 58:4,6,16 | 163:18,21 167:15 |
| 367:8 | 68:17,20,21,21 | 320:3 359:11 | 63:10 95:22 100:2 | 168:5 179:6 |
| terrestrial 325:15 | 69:1 72:15,17,20 | 373:19 377:6 | 125:3 130:11 | 184:10,14 187:6 |
| territory 369:10 | 83:1 87:20 91:17 | 381:10 | 140:19 141:10,22 | 188:6,8 194:12 |
| Terry 36:9 196:19 | 91:18,19,21 94:15 | theirs 266:16 | 142:20,21 155:11 | 195:19 197:18 |
| test 49:18 214:16 | 94:17,18,19 97:22 | therapeutic 315:5 | 159:17 160:4 | 200:13 204:14,21 |
| 229:16 291:4 | 98:2,3,18 99:6 | 322:3 | 163:3 179:10 | 210:19 213:20 |
| 299:6 330:21 | 101:8,9,14 103:9 | Theresa 3:9 36:2 | 187:14 188:13 | 217:20 218:16 |
| 392:9 | 103:13,19,19 | 41:17,18,21 | 208:22 214:10,21 | 219:10,13 220:14 |
| testament 298:18 | 105:19 108:4,22 | Theur 10:14 | 234:8 235:7 | 221:12,14 223:17 |
| tested 309:16 | 110:12,20 112:14 | they'd 108:8 | 238:21 248:16 | 229:4,9,13,18 |
| testified 278:19 | 113:13 114:19 | Thicke 1:24 5:16 | 256:8 259:20 | 230:1 231:3 |
| testimonies 271:2 | 116:5,10 117:16 | 5:17 110:8 111:19 | 260:1 262:6 | 232:16,21 233:20 |
| testimony 56:16 | 119:6,8 122:4 | 114:7 115:18 | 277:18 278:20 | 234:10 235:4 |
| 59:3 62:19 87:17 | 123:10 150:1 | 117:2 121:9 | 279:7 282:6,8 | 236:16 238:4,12 |
| 113:5 119:15 | 154:14 169:8,17 | 122:15 123:20 | 287:10,14 302:11 | 238:14 239:8 |

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 240:12,16 241:6,8 241:18 242:16 244:10,21 246:14 248:10 251:6 253:9 255:17 256:2,13,16,18 260:22 262:4,7 263:1,4,10,14,16 266:3,6 276:3 277:9,12,15 281:9 282:3,19,22 283:8 283:13 284:12,18 284:21 285:3,6,12 285:20 286:4,12 286:19 287:7,9 292:12,17,19 293:8,20 296:1 297:22 298:5,8,11 299:13 300:18 302:20 303:12,15 303:15 304:3,15 307:14 308:11,20 313:22 314:21 315:13 319:6 322:20 325:18 327:15,18,20,21 329:15,18,21 330:1,17 331:3,10 331:11,13,17,19 332:13,18 334:4,5 334:7,8,11 335:15 335:19 336:7,9,10 337:12 339:2 340:8 342:17 350:8 352:5,15,16 352:18,21 354:9 357:2,8 358:3 359:19 360:3,18 362:12,14 363:1,1 363:6 364:13 365:3,5 366:21 367:7 373:16 377:4 379:16 380:7 381:7,8 385:5,7 387:7,9 388:11 389:9 391:21 | thinkers 293:10 thinking 33:4 56:4 77:4 124:14 228:20 245:1 272:22 273:17 277:16 303:3 331:15 353:21 363:10 thinks 365:4 thinner 350:14 thinning 348:11 350:9 352:21 353:1 third 8:17 12:4 14:14 16:14 24:10 Thirteen 228:17 Thomas 235:9 thorough 91:16 96:8 115:4 thoroughly 329:11 thought 6:11 23:19 71:8 125:11 131:8 135:20 151:5 185:19 193:5 243:6 249:22 270:6 283:14 292:13 298:8 322:21 342:15 353:20 381:17 thoughts 67:18 85:12 128:15 391:15 thousands 50:16 88:12 97:17 156:17,19,20 294:18 threat 347:10 three 36:7 62:5 77:13 116:2 191:11 192:8 203:5 242:22 257:16 277:17 295:8 300:10 301:9 302:18 307:22 348:18 374:7 three-day 39:8 | threonine 223:1 224:3 225:21 thrips 39:14 throw 130:17 159:5 270:22 throwing 360:11 THURSDAY 1:8 tidbits 7:4 120:21 tie 262:5 Tier 351:4,4,12 352:2,2 tight 363:21 time 5:22 23:6 28:1 30:3,18,20 33:10 36:11 38:5,18 50:6 58:3 62:4 63:2,6,17 65:2,18 66:20 85:21 88:15 88:19 92:6 101:10 101:15 106:5 108:9 119:14 125:12 139:22 154:11 168:5,14 169:4 178:14 189:2 197:1 205:16 209:15 215:10,20,21 216:7 219:2 230:13 234:13 240:10 258:1,8 262:14 266:15,19 269:7 273:7,15,18 273:21 279:11 281:1,5 282:18 284:8 285:21 288:1,9 291:6 294:10 295:10,21 298:21 299:7 304:21 307:6,7 310:3,15 319:22 320:14 324:15 328:8 336:19 348:21 355:5 357:8 359:12 360:4 374:3 376:17 377:12 378:15 379:3,18 | 381:6 383:13 387:22 timeline 215:8 216:10,12 timelines 215:2 timer 205:10 times 46:18 47:5 53:9 136:17 304:9 308:11 327:7 365:20 timing 159:1 196:12,21 tiny 90:11 Tipton 3:14 94:21 98:4,7,8 tired 127:22 title 151:8 253:15 255:4 titled 43:7 today 5:6 7:12,17 36:5 37:5 38:1,14 41:22 45:19 51:1 87:5 98:19 99:13 102:3,13 104:13 121:20 183:16 192:22 199:9 207:18 289:2,22 291:20 292:1 306:3 311:18 327:10 336:14 369:20 393:4 today's 282:20 told 72:1 212:22 223:9 275:19 380:22 tolerance 51:18 208:10,20 tolerances 208:10 tomatoes 235:7 tomorrow 285:17 tone 68:19 Tony 264:12 tool 38:7 51:5 84:3 234:14 244:13 293:9,21 tools 66:11 73:21 304:21 309:11 | 333:7 top 127:16 topic 88:7 92:12 165:1 186:16 187:2 281:2,10 284:18 285:7,21 381:1 topics 5:6 7:11 183:5 203:6 371:19 total 171:21 172:2 173:8 192:18 242:16 243:18 373:8 totally 57:22 94:11 94:11 130:17 134:13 193:4 335:10 touch 316:3 tough 314:20 317:18 320:4 359:22 Tower 1:12 toxic 42:6,14 44:4 53:2 57:22 toxicological 158:19 206:12 261:14 toxicology 208:4 toxins 52:22 to-drink 177:4 TR 43:10 157:18 378:11 Trace 3:14 94:21 98:4,8 tracing 371:22 372:1 track 388:16 tracking 101:11 313:15 378:11 Tracy 1:19 162:17 197:18 204:20 217:21 218:22 225:12 227:8,22 228:19 233:10 245:1 259:1,17 262:19 307:12 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|----------------------------|----------------------------|----------------------------|---------------------------|---------------------------|
| 373:22 377:6 | trials 278:15 | 164:4,7,9 166:5 | 118:21 133:20 | understand 9:18 |
| trade 19:3 88:8 | tried 24:8 165:9 | 184:2 232:3 | 155:19 175:4 | 54:19 55:7 68:3,4 |
| 90:12 391:3,6 | 280:6 379:21 | 240:13 259:19 | 181:14 280:2 | 90:12 102:12 |
| tragacanth 373:6 | trip 301:9 | 271:9,13 282:21 | 289:4 290:10,18 | 105:16 126:17 |
| trajectory 309:10 | tripped 221:20 | 283:5 285:14 | 350:13 352:12 | 135:16,18 150:16 |
| transcript 262:22 | trips 41:7 | 287:16 291:15 | 366:16 | 154:3 161:7 163:1 |
| transcriptionist | trouble 113:2 | 316:8 351:11,18 | types 190:19 | 163:6,8,18 184:3 |
| 264:12 | 154:22 242:20 | 359:3 361:17 | 248:16 | 187:7 189:13,22 |
| transfer 332:4 | troubling 63:6 | 379:19 387:4,5,22 | typical 40:14 | 192:6 213:8 216:6 |
| transition 255:9 | 118:4,9 158:17 | tryptophan 223:1 | typically 138:1 | 277:18,20 281:6 |
| 275:8 344:16 | 159:6 | 224:3 225:21 | 213:10 | 284:13 287:3,4 |
| transitioning | Troy 3:12 87:22 | Tufts 69:7 | tyrosine 223:2 | 293:2 318:7 319:6 |
| 278:11 | 91:22 92:3 | Turf 243:21 | 224:5 225:22 | 319:9 321:5 |
| transparency | TRs 32:16 152:4 | turn 7:13 60:22 | T-A-B-L-E 3:2 | 353:17 357:10 |
| 135:8 153:21 | 157:17 377:18 | 107:2,5 169:7 | 4:10 | 363:19 364:7 |
| 370:20 | 383:6 | 204:20 217:20 | | |
| transparent 79:14 | truck 328:20 | 245:18 251:22 | U | understandably |
| 94:9 103:3 | true 36:15 220:20 | 270:14 290:3 | ubiquitous 100:17 | 66:11 308:9 |
| trapping 53:10 | 222:4,6 285:18 | 355:4 389:17 | ultimately 84:11 | understanding |
| traps 99:11 | 286:12 341:22 | turned 26:15 | 318:14 334:20 | 6:10 152:18 |
| travel 317:2 | 356:7 | turning 337:16 | unacceptable 42:14 | 178:16 218:4 |
| travesty 290:5 | truest 331:16 338:1 | turnover 300:22 | unanimous 112:5 | 261:1,7 276:11 |
| treading 263:5 | truly 50:20 51:19 | turns 21:22 79:19 | 114:13 123:2 | 302:10 321:8 |
| treat 293:5 | 52:16 68:15 235:6 | 363:13 364:12 | 124:9 203:2 | understood 173:15 |
| treated 46:15 47:21 | 235:9 375:19 | tweaking 266:1 | 237:13 247:20 | 185:11 189:9 |
| 73:22 193:13 | trust 60:20 72:8,10 | tweaks 216:18 | 269:1 343:17 | undertake 377:20 |
| 244:5 297:2 | 72:12 87:7,13 | twelve 116:3 | unanimously 13:13 | 378:15 |
| 334:15,16 346:17 | 254:18 291:13 | 228:17 | 46:10 48:4 | undoubtedly 61:10 |
| treatment 17:1,4 | 319:14 320:2 | twice 207:9 265:15 | unanticipated | undue 332:15 |
| 99:8 334:15 345:1 | trusted 71:7 | twisted 392:7 | 278:21 | unequivocal 375:1 |
| 345:10,18 346:6 | trustworthy 52:16 | two 21:17 34:12 | unapproved 60:9 | unequivocally 60:4 |
| 362:2,22 | truths 287:7 | 37:11 38:22 48:7 | 61:6,18 62:13 | 305:16 |
| treatments 348:9 | try 15:20 18:10 | 69:6 77:13,16 | 72:13 | Unfortunately |
| 348:10 | 24:10 25:17 115:4 | 79:9 89:1 95:15 | uncertainty 353:20 | 168:16 |
| tree 40:9 43:21 | 130:20 168:19 | 104:11 119:1 | 378:16 | uniform 174:11 |
| 85:3 279:16,18 | 254:18 280:19 | 196:10,11 203:5 | unclear 23:18 | uniformity 174:14 |
| 287:18 288:18 | 286:8 289:7 308:4 | 204:16 205:20 | uncomfortable | 186:11 |
| 289:1 290:22 | 308:5 314:4 | 206:3 210:18 | 66:20 158:9 259:5 | uniformly 170:8 |
| 297:9 326:7 | 357:13 358:8 | 225:18 228:17 | 282:8 301:17 | unintentional |
| trees 86:7 89:2 | 393:2 | 254:1 257:16 | undergone 100:18 | 25:10 |
| 95:12 325:5 337:3 | trying 20:15 64:17 | 283:8 291:11 | underlined 174:16 | union 193:10 |
| 337:4 344:14 | 64:18 103:20 | 301:9 310:7 332:1 | 175:22 180:8 | unique 12:16,20 |
| 346:9,11 | 120:11 130:7 | 334:4 348:18 | underlying 158:12 | 56:20 73:4 241:19 |
| tremendous 99:16 | 131:15 136:12 | 365:18 374:7 | undermines 320:21 | United 1:2 264:5 |
| tremendously | 149:16 154:4 | 379:3 391:18 | underneath 351:12 | 298:22 362:13 |
| 217:6 | 157:7 161:7,8 | two-thirds 52:7 | underscores | universal 182:10 |
| trial 214:20 375:17 | 162:22 163:6,8 | type 40:10,11 98:17 | 198:17 | universe 138:4 |
| | | | | 141:10,22 |

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| university 39:5 92:8,9 294:7 296:19 | USDA's 48:14 | utilize 151:20 174:9,10 366:6 | 177:3 | visible 131:5 |
| unknown 44:8 | use 8:12 10:18 11:21 21:22 38:6 | utilized 242:15 | vegetables 47:4 49:11 | visited 251:11 |
| unnecessary 94:11 96:22 | 44:2 46:14 60:1 | utilizing 144:13 155:22 244:3 | vehicle 70:15 | vital 275:7 |
| unpopular 315:16 | 60:11,13 79:12 | U.S 43:16 48:13,14 53:19 98:22 99:4 | venue 77:15 98:18 | vitamin 155:6 |
| unpredictable 312:18 | 80:22 81:2 84:3 | 210:6 306:8 | verbatim 193:22 | vitamins 97:12 382:11 |
| unrealistic 96:1 348:10 | 87:3 88:13 89:10 | 309:13 320:13 321:1 | verbiage 200:20 | voice 66:22 67:9 193:19 292:18 |
| unregistered 313:3 | 90:5,13 93:9 96:5 | U.S.C 345:22 366:11 384:8 | verification 146:10 147:20 177:19 178:22 329:12 | voices 264:14 |
| unreviewed 72:1 72:13 | 97:19 99:10,13 | | verified 146:16 147:1 174:4 329:13 | volume 172:12,14 288:22 289:12 352:7 |
| Unsettling 6:1 | 101:3,7 105:9 | V | verify 147:9,21 148:9 149:2 153:5 299:7 349:17 | volunteer 73:15 87:4 |
| unsure 256:15 | 109:4 120:5,15 | vaccines 374:14 | vernacular 219:8 | volunteered 193:1 |
| upcoming 39:15 100:14 | 129:20 138:2 | vacuum 259:9 329:22 | version 22:10 26:11 101:17 127:4 128:9 | vote 3:15 7:21 15:13,19 17:11,16 27:10 93:22 106:15 108:12 109:12 111:6 112:4 113:7,16 114:13 115:1 116:14 118:5 120:22 122:7 123:13 125:5 130:9 161:2 196:9 202:6 203:1 220:7 224:13 226:11,12 227:21 228:1 230:6 236:4,17,19 244:21 246:5 247:2 250:3 252:16 265:9,12 265:17 267:8,10 268:5 276:12,13 276:18,21 277:2 293:19 294:4,5 319:19 322:12 326:16 333:21 335:18 338:16,16 338:16,17,19 339:3,7 342:14,16 342:22 343:17 364:11 385:18 386:15,18 387:3,5 387:5,12,19,20 388:1 389:8 |
| update 3:22 11:16 11:17 38:15 39:15 40:2 99:3 203:7 205:14 207:20 208:17 212:16 214:6 215:11 377:13 378:13 382:15 | 146:18,22 158:16 162:2 165:18 174:6 177:16 182:3 184:11 193:3 194:20 195:8 199:16 206:10 207:13 208:5,12 209:12 209:22 211:1,12 211:22 212:15,19 213:2,4,4 220:3 223:4 226:1 227:12 233:7 237:17 238:4 242:1 248:11,11 248:14 258:20 271:21 273:9 293:15 296:11,17 297:1 298:18 300:11 309:7,22 313:2,3,4 315:2 320:21 321:12,19 322:8,10 324:13 324:19 325:14 330:14 334:13 335:11 344:2,17 345:20 346:15 370:20 384:10 | validated 279:13 | vett 329:11 348:4 | |
| updated 99:4 380:10 | 227:12 233:7 237:17 238:4 242:1 248:11,11 248:14 258:20 271:21 273:9 293:15 296:11,17 297:1 298:18 300:11 309:7,22 313:2,3,4 315:2 320:21 321:12,19 322:8,10 324:13 324:19 325:14 330:14 334:13 335:11 344:2,17 345:20 346:15 370:20 384:10 | valine 223:2 224:5 225:22 | vetting 362:3 | |
| updates 379:17 | 242:1 248:11,11 248:14 258:20 271:21 273:9 293:15 296:11,17 297:1 298:18 300:11 309:7,22 313:2,3,4 315:2 320:21 321:12,19 322:8,10 324:13 324:19 325:14 330:14 334:13 335:11 344:2,17 345:20 346:15 370:20 384:10 | Vallaes 3:11 59:8 69:2,4,5 73:13 75:4 77:20 78:1 80:13 81:10,20 82:4 83:5 85:13 | viability 90:21 216:11 | |
| updating 205:18 | 248:14 258:20 271:21 273:9 293:15 296:11,17 297:1 298:18 300:11 309:7,22 313:2,3,4 315:2 320:21 321:12,19 322:8,10 324:13 324:19 325:14 330:14 334:13 335:11 344:2,17 345:20 346:15 370:20 384:10 | valley 333:3 | viable 91:3 375:19 | |
| upper 324:2 348:17 | 271:21 273:9 293:15 296:11,17 297:1 298:18 300:11 309:7,22 313:2,3,4 315:2 320:21 321:12,19 322:8,10 324:13 324:19 325:14 330:14 334:13 335:11 344:2,17 345:20 346:15 370:20 384:10 | valuable 139:14 234:14 322:1 | Vice 381:13,20 382:1 | |
| upset 270:2 364:8 | 297:1 298:18 300:11 309:7,22 313:2,3,4 315:2 320:21 321:12,19 322:8,10 324:13 324:19 325:14 330:14 334:13 335:11 344:2,17 345:20 346:15 370:20 384:10 | value 120:11 323:20 356:20 | Vice-Chancellor 294:6 | |
| urge 45:22 51:2 59:22 69:9 90:2 94:14 97:21 179:8 320:14 | 300:11 309:7,22 313:2,3,4 315:2 320:21 321:12,19 322:8,10 324:13 324:19 325:14 330:14 334:13 335:11 344:2,17 345:20 346:15 370:20 384:10 | valve 300:17 | victims 308:21,22 309:2 | |
| urged 183:8 | 313:2,3,4 315:2 320:21 321:12,19 322:8,10 324:13 324:19 325:14 330:14 334:13 335:11 344:2,17 345:20 346:15 370:20 384:10 | variability 331:11 | view 64:19 73:6 238:16 302:10 | |
| Uris 3:10 45:15 50:7,9,10 54:14 54:19 55:7,12,18 56:6,12,22 57:15 57:19 58:8,14,20 59:2 | 322:8,10 324:13 324:19 325:14 330:14 334:13 335:11 344:2,17 345:20 346:15 370:20 384:10 | varieties 296:15 350:10 | viewed 67:4 | |
| USDA 59:16,17 61:1 78:2 82:7 294:12,15 341:4 390:21 | 330:14 334:13 335:11 344:2,17 345:20 346:15 370:20 384:10 | variety 12:18,21 177:17 350:12 | viewing 69:10 | |
| | useful 249:1 | various 49:6 84:8 164:19 165:14,15 166:20 369:7 370:3 | viewpoint 314:8 | |
| | users 10:22 155:2 | varroa 283:22,22 | viewpoints 86:13 | |
| | uses 53:20 82:13 120:11 244:4 315:5,6 | vary 353:17 | views 273:6 | |
| | usually 151:16 311:13 | vast 157:4 | vigorous 20:15 | |
| | | vector 241:1 | Vilsack 5:9 295:13 | |
| | | vegetable 49:13 | vinasse 382:5 | |
| | | | violation 60:17 | |
| | | | virtually 88:14 298:22 | |

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| voted 13:15 27:17 46:10 249:5 281:8 386:18,21 | 38:4 41:4 49:3,16 51:11 52:4 63:18 68:7 69:20 77:7 87:6,7 88:20 96:16 107:9 108:5 108:6 119:17,20 120:1,6,8 124:20 125:14 126:2,7 128:12,13,14,20 129:14 131:12 133:7 139:4,13 140:10,13 141:1 151:2 152:16 154:1,11 156:6 157:3 160:15 161:19,20 163:4,5 189:13 196:2 197:9 200:20,21 201:12 205:2 217:2 218:7,19 230:7 236:3,4 253:12,18 254:9 264:3 265:21 274:14 275:9 279:18 280:20 281:11,13 286:17 296:4,8 297:19 316:16 319:6 322:21 329:18,22 330:19 337:11 339:4 341:16 342:9,13 348:14 350:1 357:1 360:13 361:8,9,14 362:8 364:10 365:20 366:12 367:14 368:11 375:2 376:7,14,17 376:21,22 385:16 392:15 | 287:2 wants 82:19 127:20 133:16 156:2 175:2 189:16 363:5,7 War 58:3 warehouses 351:13 warehouse's 351:7 warm 336:21 warning 50:18 239:9 warrant 362:19 washing 43:11 Washington 194:11,16 324:1 351:2,20 wasn't 24:21 40:4 136:5 157:19 238:7 249:11 277:1 281:9 284:22 289:8 291:18,20 318:13 385:9,10 watch 86:7 191:22 239:10 watching 342:20 watch/stop 273:9 water 17:1,1 43:11 171:22 172:2,5,13 172:16 173:7,8 176:15,16,21 178:5,8 183:8 186:21 190:3,12 191:4 196:16 303:10 316:10 329:4 369:22 370:3 373:4 waters 263:7 water-excluded 186:19 Wave 170:16 way 15:8 22:1 23:11,20 55:21 66:12 70:8 79:1 95:8 118:16 119:3 142:9 153:20 159:13 162:7,8,9 | 162:15 166:4 167:16 179:1 186:1 190:18 191:19 204:18 206:18 208:15 219:4 248:13 251:8 252:21 259:13 269:22 270:3,4,9 275:2,8 275:10 276:11 277:19 280:9 281:9 293:18 300:2,18 308:6 313:11 314:4 324:11 328:9 335:13 336:5 337:4,7 347:22 354:17 355:17 358:5 376:8 378:20 388:4 ways 120:15 166:20 316:11 375:6 wearied 284:17 weather 277:22 346:10 web 8:20 12:8 14:17 16:17 178:13 183:2,9 217:14 week 230:1 269:19 weeks 46:18 88:22 291:11 weigh 287:16 weight 135:2,5,7 150:17 171:22 172:2 173:5,6,8 358:18 welcome 29:14,15 41:10,16 89:5 218:3 385:18 welcomed 192:15 welfare 295:5 well-intentioned 263:14 well-meaning 63:20 Wendell 6:1 | Wendy 1:21 123:15 224:15 went 106:10 231:12 269:14 281:5 318:15,16 326:21 393:6 weren't 26:17 36:4 192:5 308:19 Western 194:15 309:13 Wetable 243:21 wettest 278:2 we'll 7:6,9,22 30:19 30:22 35:15 41:12 87:3 101:18 108:17 115:1 116:6 117:11 120:22 123:4 169:6 172:7 203:8 204:21 213:4 214:14 216:7,15 217:21,22 228:22 230:6 245:18 246:14 247:4 250:2 251:3,19 269:11 270:11 274:7,8 290:13 297:20 333:20 339:7 342:22 355:4 359:7,17 360:19 363:15 367:19,20 368:16 370:13,13 371:9 371:11 373:4,14 374:6 377:2 382:16 383:1,6,18 386:14 389:8 we're 7:7 8:3 18:10 19:10 20:4,11,14 21:11 22:9 23:10 24:11,12,12,17 26:16 29:6 30:15 31:1,3 32:5,6 33:10,13 34:19 35:7 64:3 74:17 75:9 76:3,9 77:4 80:11 83:17 86:1 |
| W | | | | |
| wait 102:14 274:9 321:13 364:3 365:1 waiting 104:2 292:9,11 354:15 372:22 wake 152:10 312:22 Waldo 372:17 walk 218:19 WALKER 1:24 110:3 111:14 112:6 114:2 115:13 116:19 121:4 122:10 124:7 197:17 202:21 225:6 227:2 228:11 237:6 245:9 247:11 250:11 268:13 294:3 339:14 343:4 389:13 walls 233:19 want 20:2 21:10 22:12 25:15 28:15 32:4 33:22 35:3 | wanted 33:3 95:8 112:19 117:22 120:19 140:6 282:15 289:4 310:22 381:8 390:18 wanting 120:10 | | | |

| | | | | |
|-------------------|----------------------------|---------------------------|------------------------|---------------------------|
| 86:8,16 104:19 | 361:17 362:10,15 | willing 129:10 | 258:12 359:1 | 158:17 169:2 |
| 106:3 107:22 | 362:16 363:11,14 | 276:4 285:22 | work 27:22 31:9 | 191:14 213:19 |
| 125:6,10 126:12 | 363:21 365:16 | 296:13 310:3 | 64:8 67:3 68:16 | 277:16,19 278:18 |
| 129:7,8 130:1,2 | 368:1,6,13 369:6 | 331:8 | 78:4 85:9 92:16 | 279:6 325:9 378:3 |
| 130:11 134:14 | 371:10 372:21 | willingness 323:2 | 95:22 101:11 | 379:13 |
| 136:2,2 137:4 | 374:2 375:3 376:4 | win 36:10 278:5 | 103:10 106:14 | worker 318:9 |
| 141:19 142:7,20 | 376:13,16 383:11 | winners 196:11 | 108:10 109:6 | workers 318:9,12 |
| 149:13 150:9 | 384:16 388:13 | winter 336:20 | 129:2 158:2,7,8 | working 3:22 39:12 |
| 153:8 154:4 | 391:8 | wiping 47:1 | 159:11 169:1,4,13 | 203:7 205:5,6,21 |
| 155:11,15 157:1,7 | we've 5:6 6:9 24:3 | wisdom 327:11 | 186:16 187:2 | 206:1,19 209:6,22 |
| 157:11,15 159:14 | 35:8 64:15 69:13 | wish 88:4 96:19 | 190:6,10,17 | 210:15 212:19 |
| 159:21 160:6,20 | 75:21 82:6 89:2 | 303:22 | 191:14 200:19 | 240:8,15 281:21 |
| 162:12 164:4,9 | 137:20 159:7 | wishful 331:15 | 201:12,14,20 | 286:3 288:18,21 |
| 165:21 171:3,6 | 212:21 213:19,20 | withdraw 298:4 | 203:4,6 204:14,21 | 296:10 312:14 |
| 173:17 174:12 | 214:2,5,15 218:14 | 366:1 381:6 | 205:16 206:4 | 318:8 333:11 |
| 197:7 204:14 | 225:16 230:3 | 385:12,17 386:2 | 209:6 210:15 | 349:9 350:3 361:2 |
| 206:19 213:2,22 | 231:21 241:18 | 386:11 387:6,10 | 214:21,22 216:14 | 369:20 373:2,4 |
| 226:11 227:20 | 255:8 270:18 | 387:20 | 217:3 232:12 | 377:10,22 381:17 |
| 232:21 234:19 | 274:13 277:16 | withdrawing 265:3 | 258:11 260:14 | 382:13,14,14 |
| 236:17 244:21 | 278:12 283:11 | 387:12 388:2 | 262:8 266:12 | 383:9,18 390:9 |
| 251:6 252:5 | 289:14,20 290:8 | withdrawn 385:6,9 | 279:8 281:17 | 391:5 |
| 253:22 256:7 | 290:16 293:8 | 385:11 | 282:2 284:2,7 | workings 360:7 |
| 259:18 263:1 | 296:11 301:20 | withdrew 386:17 | 285:19,22 286:16 | workload 65:4 |
| 264:18 265:9 | 304:4 328:1 333:3 | 387:3 | 293:5 301:14 | workplace 318:12 |
| 266:9,11 269:9,21 | 359:8,19 364:13 | withheld 43:3,5 | 302:11 307:2 | workplan 201:13 |
| 270:4,19 271:3,13 | 373:7 374:7 376:7 | witness 73:1 | 309:6 317:16 | 359:8 360:22 |
| 276:4,19,20 | 376:11 378:19 | Wolf 170:14 | 319:21 332:22 | Workplans 4:12 |
| 277:22 278:9,11 | 379:1 382:20 | won 197:18 | 349:13,15,17 | works 206:6 |
| 280:11 282:16,22 | we/us 328:5 | wondering 30:4 | 350:2 357:6,21,22 | 322:18 |
| 283:5 285:4,7,10 | whatever-the-tra... | 335:3 | 358:17 359:17 | world 6:7 16:22 |
| 285:13,13,18,22 | 220:18 | wool 333:2 | 360:21 366:13 | 48:13 58:2,3 |
| 286:1,3 288:12 | whichever 270:3,9 | word 93:4 128:12 | 367:17,18,19,21 | 85:19 100:17 |
| 289:18 290:11,15 | 341:19 | 154:17 158:16 | 367:22 368:4,8,16 | 141:13 146:3 |
| 292:12 299:7 | whipsawed 278:1 | 173:1,9 238:4 | 368:19,21 369:14 | 166:12 302:10 |
| 301:1,3,5,6 | white 131:4 170:16 | 257:21 258:17,20 | 369:16 370:6,10 | 322:2 323:18 |
| 302:20,22 303:2,4 | 281:18 304:7 | 281:13 330:3 | 371:5 372:1 | world's 332:8 |
| 303:8,9,13 306:10 | 325:2 | 331:16 336:9 | 373:11 374:1,14 | worm 99:19 |
| 309:9,10,12 | whoa 163:16 | 360:3,13 361:6 | 376:3 377:12,15 | worried 137:18 |
| 322:10 325:13 | wholeheartedly | wording 19:7 26:22 | 379:1,4 380:14 | 284:16 |
| 327:18 331:10 | 307:4 | words 81:17 126:21 | 381:2,5 382:15 | worse 326:22 |
| 332:13 333:13 | wholesalers 334:19 | 127:18 135:1 | 383:1,13,21 389:2 | worst 285:15 |
| 334:11 335:20 | who've 324:4 | 153:1 172:7 | 389:3 391:12 | worth 294:19 |
| 337:12,16 338:14 | wide 177:17 239:17 | 184:22 193:22 | 392:17,18 | 317:13 332:11 |
| 339:3 348:6,7 | widely 16:21 | 257:9,17 258:7,7 | workable 229:2 | 357:8 |
| 350:3,15 351:17 | wider 282:22 | 295:9 301:18 | 390:10 | worthwhile 161:12 |
| 352:17 357:2,15 | wife 318:3 | wordsmith 355:2 | worked 30:11 | 358:8 |
| 359:16 360:14 | Wild 10:19 | wordsmithing | 31:14 59:12 | wouldn't 56:7 |

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 201:18 238:8 241:5 246:5 291:19,21 313:11 351:16 wrap 83:3 275:17 286:19 333:19 359:9,17 wrapping 368:1 wraps 377:4 wrenching 306:15 wrestle 392:11 write 20:18 332:3 writing 175:17 367:12 written 3:6,18 24:16 26:11 46:13 96:11 98:15 101:10 197:12 218:22 248:22 368:7 wrong 57:9 163:5 223:13 331:3 337:7 363:14 364:8,9,13 wrote 164:2 Wyard 88:7 W,D 19:3 | 173:19 189:8 195:10 243:16 249:19,20 273:3 279:7 292:1 294:12 299:2 300:10,15 310:7 313:16 315:19 321:6,7,18 327:4 327:7 329:7 332:2 332:6 336:15,15 336:16 391:18 yeast 97:12 yellow 36:7 192:8 yeses 121:18 228:17 yesterday 36:5 40:3 66:14 67:20 102:5 219:1,2 220:13 222:14 229:7 232:17 233:15 241:12 271:2,9 291:4 310:6 334:10 335:6 390:20 York 46:18 47:5 194:2 young 319:9 y'all's 217:19 | 340:13 342:8 352:18 356:17 357:16 365:11 377:9 388:20 zero 121:18 183:17 225:11 285:3 291:6 335:7 zinc 3:24 229:5 230:4,21 231:5,8 235:21 237:15 | 200:11 101 3:14 106 3:15 107-35-7 227:11 11 1:9 21:3 11th 219:11 11:15 169:6 11:53 203:13 12 88:17 221:9 250:21 359:13 12:00 203:4 126 213:1 13 383:2 133-32-4 246:11,18 248:1 14 170:12 380:3 383:3 390:6 15 124:9 203:9,11 225:11 227:7 249:20 286:14 333:22 359:7 391:17 15-minute 269:11 15-0 114:13 237:13 247:20 169 3:19 17th 11:15 18 88:17 192:16 180 208:8 1862 294:14 1890 294:13 19 241:20 243:12 243:13,15,22 244:16 192 3:21 1970s 95:5 199 127:13 | 20 45:21 336:15 2001 59:11 2002 92:8 157:10 2004 207:21 322:17 2005 47:9 63:3 2006 207:22 2008 288:22 308:18 313:17 2009 11:15 14:3 249:3 369:2 2009-2010 48:16 201 129:17 2010 8:9 2011 11:16 14:4 40:12 52:3 78:2,3 84:19 140:12 159:8 165:1,13 249:4 259:19 290:3 308:19 309:5 2012 8:19 12:6 14:16 16:6,16 375:16 2013 1:9 215:6 2014 40:12 271:19 282:6 288:12 298:5,14 309:18 330:20 344:12 345:15 366:6 384:12 2015 215:8 365:15 373:5 2016 38:19 40:17 272:2 290:9 294:9 295:20 301:15 305:21 331:7 2017 215:13 305:17 344:12 345:21 366:7 384:12 2018 295:20 205 3:22 329:13 205.206(e) 369:13 205.302 174:1 181:20 205.302(a) 171:10 205.601 98:21 207:10 237:16 |
| X | | | | |
| X 79:10,18 | | | | |
| Y | Z | | | |
| Yay 103:8 year 18:6 46:22 48:17 70:1 89:2 92:10 215:5 248:13 278:3 284:9 300:12 320:16 326:19 336:19 349:10,11 351:10 365:14 391:9,10,16,17 yearly 378:3,4 yearned 312:6 years 46:21 50:16 59:12 75:22 76:12 95:12,18 98:16 99:5,22 158:18,22 | Zareb 3:13 92:1 94:20 95:1 Zea 1:23 17:19 27:21 28:7 31:18 62:16 63:1 102:9 108:9 111:8 112:15 113:13 117:18 126:19 132:10 135:13 142:10 144:20 152:12 159:19 160:12 161:7 163:13 169:1 206:1 216:22 234:1 250:5 252:2 257:1 265:1 267:19 320:7 | \$ \$1.5 391:3 \$2 390:21 \$30 69:22 87:13 \$5 318:22 | 0 | |
| | | 06 59:11 | | |
| | | 1 | | |
| | | 1 1:1 25:19 30:8,8 42:5 141:17 171:21 208:3 263:21 351:4 352:2 390:6 1st 11:16 38:19 1,000 88:12 1,3 16:2 1,3-Dibromo 123:5 1,3-Dibromo-5,5-... 122:1 1,300 46:1 52:18 1,500 49:7 61:16 1:15 203:10,13 1:17 204:2 10 106:4 173:19 221:9 292:1 299:2 336:15 10:00 106:8 10:09 106:11 100 58:11 170:4 171:17 176:7 182:5,7,15 184:7 184:11,13,21 185:2,5,6,13,15 196:3 198:1,18 199:13,18 200:10 | | 200 11 101 3:14 106 3:15 107-35-7 227:11 11 1:9 21:3 11th 219:11 11:15 169:6 11:53 203:13 12 88:17 221:9 250:21 359:13 12:00 203:4 126 213:1 13 383:2 133-32-4 246:11,18 248:1 14 170:12 380:3 383:3 390:6 15 124:9 203:9,11 225:11 227:7 249:20 286:14 333:22 359:7 391:17 15-minute 269:11 15-0 114:13 237:13 247:20 169 3:19 17th 11:15 18 88:17 192:16 180 208:8 1862 294:14 1890 294:13 19 241:20 243:12 243:13,15,22 244:16 192 3:21 1970s 95:5 199 127:13 |
| | | | 2 | |
| | | | 2 2:7 21:2 25:19 30:8 172:11 263:21 351:4,12 352:2 2:26 269:14 2:30 269:11 2:44 269:15 2:45 269:12 | |

| | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| 248:2 271:20 344:9 205.602 38:20 205.603 207:11 226:1 205.603(d) 227:11 205.605 8:11 16:9 37:9 43:1 103:5 129:18 175:13 176:3 223:4 205.605(b) 17:11 110:16 123:7 205.606 11:20 12:12 14:8 15:15 54:18 114:16 115:7 117:14 176:3 205.672 344:20 345:22 366:12 384:9 206 329:13 21 95:12 344:12,12 345:21 366:6,7 21st 271:19 272:2 384:11,12 218 3:24 22 239:14 229 3:24 24 280:13 324:17 246 3:25 251 3:26 271 3:26 29th 8:8 46:19 | 390 4:14 393 4:17 <hr/> 4 <hr/> 4 4:7 19:4 23:18 24:3 98:22 100:19 141:18 167:4 176:15 200:17 201:19 207:1,13 208:3,8 210:21 215:13,14 263:21 4A 207:5 4B 207:6 4,000 53:9 4:31 359:14 4:43 359:15 4:45 359:13 40 47:1 286:22 41 3:9 45 3:10 <hr/> 5 <hr/> 5 3:3 18:22 23:17 178:18 179:22 180:14 192:15 299:2 5,5-Dimethylhyd... 123:6 5:23 393:6 50 3:10 47:2 97:3 59 3:11 <hr/> 6 <hr/> 6 179:14 187:6 189:13 6th 1:12 601 38:7 147:16 605 37:12 89:11 140:15,18 146:21 147:2,10,19 148:8 148:22 153:16 165:15 166:2 373:3 605.606 138:21 606 56:20 89:11 103:5 113:3 146:17,19 153:17 166:3 | 6518(k)(6) 345:22 366:11 384:9 67 19:4 672 354:5 69 3:11 <hr/> 7 <hr/> 7 3:6 98:20 181:18 198:14,17 199:11 240:6 344:20 345:22 366:11 384:8,9 7th 14:4 70 180:17,21 77 240:5 <hr/> 8 <hr/> 8 26:1 182:12 221:9 8,000 86:21 8:00 1:12 8:02 5:2 80 61:7 80s 316:1 88 3:12 18:18,21 <hr/> 9 <hr/> 9 19:1 182:21 9th 16:6 9:55 106:10 92 3:12 921 1:12 95 3:13 48:15 180:3 180:18,20 189:16 189:17,19 98 3:14 99 89:13 | | |
| <hr/> 3 <hr/> 3 3:1 99:2 167:3 173:3,11 175:9 207:14 250:21 263:21 3s 100:20 30 59:12 125:10 158:18 321:18 336:15 30th 14:3 32 240:4 368 4:12 37 3:8 53:22 | | | | |

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This is to certify that the foregoing transcript


In the matter of: National Organic Standards Board

Before: USDA

Date: 04-11-13

Place: Portland, OR

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