



October 3, 2019

National Organic Standards Board
USDA – AMS
1400 Independence Ave, SW
Washington, DC 20250
RE: NOP-19-0038-NOP-18-06

National Organic Standards Board members:

The Ohio Ecological Food and Farm Association (OEFFA) is a grassroots coalition of more than 4,200 farmers, gardeners, retailers, educators, and others who since 1979 have worked to build a healthy food system that brings prosperity to family farmers, safeguards the environment, and provides safe, local food. Certified organic farmers make up the bulk of our membership, as well as the bulk of our policy advisory council. We are struck by the sentiments of some of these farmers, many of them young and beginning farmers who, despite a vehement commitment to organic integrity themselves, cited fatigue, burnout, and a sense of loneliness in trying to do organic work. They express frustrations with USDA, and in competing, confusing labels which have proliferated to try to compensate for the shortfalls of the National Organic Program.

OEFFA's Certification program has been in operation since 1981. OEFFA certifies more than 1,300 organic producers and food processors, in a twelve-state region, ensuring that these operations meet the standards established for organic products, and collaborating with partners such as the Accredited Certifiers Association and International Organic Inspectors Association to foster consistency and clarity both in the way we conduct ourselves, and in what we expect from producers and handlers we certify, as well as from our colleagues at the NOP and NOSB.

OEFFA employs education, advocacy, and grassroots organizing to promote local and organic foods, helping farmers and eaters connect to build a sustainable food system. We work collaboratively with groups such as the Organic Farmers Association, the National Organic Coalition, and the National Sustainable Agriculture Coalition to affect positive food systems change. We want to support our farmers in their efforts to protect organic integrity and educate their communities about its benefits, its rigor, its strong values of transparency and continuous improvement. It pains us to hear members say that they remain certified in a period they characterize as a USDA failure, in the hopes that they can make it, as one stated, "to the other side with organic still being strong with its original intent." It is imperative that if organic is to remain strong and grow into the future, we must listen and respond to the needs of these growers, people struggling to meet high standards with more being asked of them each day. As the NOSB moves forward with discussion documents, policy proposals and formal

recommendations, we must put the needs of our growers at the forefront. We want producers, certifiers and activists within our organization to be proud of organic, and have faith in its unique and thoughtful, democratic processes to improve transparency, to provide consistency and clarity, and to meet and raise the agricultural and environmental bar.

It is with these comments from OEFFA members in mind that we write you. We appreciate the work you do as volunteer members of the NOSB, and we want you to know how important your work is to us, and to the producers who are depending on you to protect organic.

It is in this spirit that we respectfully offer the following comments:

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HANDLING SUBCOMMITTEE

Sunset Reviews

CITRIC ACID

DAIRY CULTURES

ENZYMES

MICROORGANISMS

YEAST

These materials are widely used by OEFFA producers in organic handling and we support their re-listing. Because the Dairy Cultures Technical Review from 1995 does not address ancillary substances, OEFFA relies on the Microorganisms Technical Review, which does list them, as a reference for Dairy Cultures.

NUTRIENTS, VITAMINS, AND MINERALS

This group listing functions differently than much of the National List, which allows or disallows specific materials. The group listing leads to regulatory inconsistency among certifiers. We agree with the National Organic Coalition and others who have repeatedly called for this to be addressed, and ask that there would be ample lead time, should this listing be changed into a material-by-material listing, as is customary in the majority of the National List materials, to avoid confusion among organic handlers.

POST-HARVEST HANDLING AND “100% ORGANIC” STATUS

There are currently inconsistencies among certifiers on this issue. Some say that any products with non-certified materials contacting organic products after harvest disqualify them from obtaining 100% organic status. Others say that any raw agricultural commodity produced on an organic farm is 100% organic, regardless of post-harvest handling materials. Certifier policies also differ with respect to how crops are listed on producer certificates as opposed to how they may be treated for calculation purposes later in the chain of production. There is broad frustration with the 100% labeling category. That said, if it is going to continue to be a part of the organic rule, certifiers need guidance on this topic to ensure consistent application of 100% organic status. OEFFA supports official, documented recognition of any raw agricultural commodity produced on an organic farm as 100% organic, regardless of the use of compliant post-harvest handling materials.

CROPS SUBCOMMITTEE

[PROPOSAL: FATTY ALCOHOL- PETITIONED](#)

OEFFA does not support the petition to add Fatty Alcohols to the National List. We certify organic tobacco growers who utilize effective alternatives for suckering in organic tobacco production.

[PROPOSAL: POTASSIUM HYPOCHLORITE- PETITIONED](#)

OEFFA supports the petition to add Potassium Hypochlorite to the National List, as a non-salinizing alternative to sodium hypochlorite for irrigation system cleaning. Please also see our comments regarding the Former Discussion Document: Assessing Cleaning and Sanitation Materials for Use in Organic Crops, Livestock, and Handling, regarding the need for a comprehensive review of these materials.

2021 Crop Sunset Reviews

[HYDROGEN PEROXIDE \[205.601\(A\)\(4\) AND 205.601\(I\)\(5\)\]](#)

[OILS, HORTICULTURAL \(NARROW RANGE OILS\)\[205.601\(B\) AND 205.601\(E\)\]](#)

[MAGNESIUM SULFATE](#)

OEFFA Supports the continued listing of Hydrogen Peroxide, Horticultural Oils, and Magnesium Sulfate on the National List.

[DISCUSSION DOCUMENT: PAPER \(PLANT POTS AND OTHER CROP PRODUCTION AIDS\)](#)

OEFFA continues to view Paper Pots as a necessary part of an innovative and labor-saving transplanting system. We also believe that this system has the potential to diminish the amount of plastic used on mixed vegetable operations that utilize it, as plastic cell trays and plastic mulch are not compatible with the paper pot transplanter. We appreciate the postponement of the paper pot prohibition in an effort to gather more information, and we are grateful for the July 2019 Technical Report on Paper Pots and Containers. We support the continued discussion in an effort to find consistency with regard to this material, and we offer the following input:

- There is no reliable way to discern contents of most recycled paper (including genetically engineered plant materials, synthetic fibers, adhesives or additives). Any rules for composition should apply only to virgin paper products and include non-GMO plant sources and minimal synthetic content.
- A synthetic fiber threshold (for virgin paper) could be based on the current average content with a gradual diminishment in allowed content over the next several years to allow for marketplace research and commercial availability of nonsynthetic strengthening fiber sources.
- According to the Technical Report, there have not been studies of biodegradability of synthetic fibers, so no timeline of degradation should be specified at this time (but could be added at next Sunset Review based on future

research). Biodegradation of paper pots overall and risks to wildlife/livestock are not substantially different from other paper uses permitted in organics.

- Adhesives used for paper chains should be either natural or normally-occurring in paper (as described in the Technical Report).
- For both virgin and recycled paper, it should be specified that added fungicides, insecticides, or other synthetic materials must be allowed under NOP Standards or on the National List if not typically found in paper. The addition of these substances to improve paper longevity in greenhouse conditions is a risk if their prohibition is not specified.

FIELD AND GREENHOUSE CONTAINER PRODUCTION

We noted that the updated Work Agenda lists “field and greenhouse container production” as being “on hold” since 2017.

It is our understanding that a current focus of the NOSB and NOP is clarity and consistency of enforcement. The integrity of the organic seal and the market for organic products is harmed in the absence of clear and consistent standards, and when the NOP allows multiple and conflicting interpretations of the organic regulations across certifiers.

OEFFA agrees that clear and consistent standards are paramount. There are existing and evolving systems of production that need additional oversight to eliminate inconsistencies among certifiers and operations. **In light of the progress being made with regard to organic fraud issues, we urge the NOSB and NOP to advance work on Field and Greenhouse Container Production, a work agenda item that has been previously approved by the NOP, by putting this topic on the agenda for the Spring 2020 NOSB meeting.** Further action is essential to ensure clarity and consistency in the organic standards and to prevent multiple conflicting requirements across certifiers.

MATERIALS SUBCOMMITTEE

PROPOSAL: GENETIC INTEGRITY TRANSPARENCY OF SEED GROWN ON ORGANIC LAND

OEFFA appreciates the time dedicated to this subject by the NOSB, and by our colleagues at the Organic Seed Alliance who gathered input from the seed industry. Still, OEFFA is in strong disagreement with this proposal.

- 1. This proposal does not improve transparency.**

In preparation for this meeting, we've heard colleagues reference this proposal as a "good first step" towards transparency, but we question that characterization. To us, this proposal seems more like an affirmation of the status quo. Producers can currently ask seed companies for information about genetic content. We find it perplexing that after six years of working on this issue, our best "first step forward" is to ask certifiers to let producers know that they can ask for information about seed they have already purchased.

2. Seed companies should be asked to share information up-front.

OEFFA producers are perplexed as to why seed companies are not being asked to share information up-front with producers, rather than producers being reminded to ask for the information. Instead, we ask that seed companies act in good faith to be transparent- to change their processes, and work with the scientific community to develop testing to inform farmers of the amount of foreign genetic material present in the seed they purchase, before they purchase it. Farmers, after all, have been required to change their processes to protect their crops from genetic contamination on the farm.

3. Increasing information provided may not necessarily mean less organic seed or fewer varieties.

Loss of genetic diversity, seed varieties and germplasm are real concerns for the organic community, but it is not clear to us how it follows that greater transparency on the part of the seed dealer will lead to these challenges. On the contrary, OEFFA producers posit that if level of GE contamination were to be printed on the seed tags, or shared in some other way prior to purchase, that market forces could potentially work to increase the purity of corn seed being provided which would support growers and the industry over the long-term. Our farmers also expect that the cost of providing this information up-front would be externalized onto the seed buyers in the form of higher seed prices. In short, transparency could be used as a marketing opportunity for seed companies, as it already has been by some.

4. How can we best move forward?

In light of the disparate views within the community of stakeholders, **we ask the NOSB to take the proposal back to subcommittee for continued work** toward the goal of keeping GE contamination out of organic food and finding a workable, transparent solution to begin gathering information about the breadth and depth of this challenge. Further, **we agree with the NOSB request that the NOP convene a task force that that would collect information regarding the genetic integrity of seed planted on organic land so the whole community will have access to this information.** We can address this problem, but first we must gather the most accurate and reliable information regarding GE contamination in seed as possible. **Please take this proposal back to subcommittee and consider these concerns.**

The Way in Which Research Is Conducted

The way research is conducted is just as important as the research itself. To the extent possible, organic research should be done in partnership with organic producers on working farms. This will help ground the research in the realities faced by organic producers in the field. Further, researchers should take care to disseminate the interim and end-of-study findings of research with organic producers, in brief, accessible technical publications, and in paper and digital formats, to maximize farmers' access to this information.

Livestock

1. Evaluation of methionine for use in organic poultry production

We have noticed an increased use of metal methionine hydroxy analogue chelates, or, in common language, synthetic methionine stuck to copper, manganese, or zinc. We have allowed the use of such chelates under §205.603(d)(2), "Trace minerals, used for enrichment or fortification when FDA approved," because these substances are AAFCO approved as sources of these minerals. Typically, however, synthetic methionine use would be regulated under §205.603(d)(1), which specifically addresses DL-Methionine. This work-around underscores the urgent need for natural methionine sources within a holistic, systems-based approach to poultry production.

Substantial research has already been conducted investigating isolated strategies for raising chickens organically and humanely without synthetic amino acid supplementation. **Systems based research on eliminating DL-Methionine in organic poultry feeds should investigate the impacts of natural methionine feed sources, breed, and high-welfare management strategies simultaneously. Further, given the recent petition of fenbendazole for use in poultry systems, holistic management research should take into consideration the methods used for parasite management and mitigation in organic poultry systems.** If we don't spend time investigating natural methionine sources and parasite management in a systems-based approach, creative ways of including synthetic methionine in poultry diets, and requests for further synthetics to be included on the national list will continue to proliferate.

Crops

1. Organic no-till

The NOSB has acknowledged that "Organic no-till preserves and builds soil organic matter, conserves soil moisture, reduces soil erosion, and requires less fuel and labor than standard organic row crop farming."

We concur with the NOSB recommendation for increased research focusing on the benefits of organic no-till practices and the need for continued research investments that address ongoing challenges to implementation. Issues of weed, disease, and insect management as detailed by the NOSB are critical issues to be resolved so that organic practices can continue to be the gold standard in sustainable agriculture.

Additionally, as climate variability concerns increase and policymakers look to carbon sequestration solutions, an organic systems approach that utilizes no-till promises further societal benefits.

2. **Study the decomposition rates and effects of biodegradable biobased mulch film residues on soil biology**

OEFFA acknowledges that a biodegradable biobased mulch film would be a great asset to producers, and we receive regular requests for its use. Simultaneously, a great deal of plastic is currently in use by organic producers, much of which ends up in the landfill at the end of each season. Just as we have no desire for a product to be in use which would cause environmental and health effects as it breaks down in the soil, we are eager for an alternative to plastic mulch. Additional research and development of a safe, biodegradable biobased mulch film for organic production is imperative.

3. **Genetic Integrity Transparency of Seed**

Given the lack of forward movement of the former Genetic Integrity Transparency of Seed Grown on organic land proposal, which would have begun gathering data through a pilot corn project, we urge a research project to begin understanding the breadth and depth of this important issue and the impacts it has on organic farmers, seed companies, and producers. It is our hope that such research could eventually be used to help identify thresholds that could be used for policy making.

Coexistence

1. **Integrity of breeding lines and ways to mitigate small amounts of genetic presence**

There are many questions about the viability of public germplasm collections. Understanding inadvertent presence of GMOs in those collections is critical. Maintaining pure breeding lines is a foundation for a strong organic agriculture system and should be prioritized.

2. **Prevention of GMO contamination: Evaluation of effectiveness**

OEFFA reiterates previous requests for a better understanding of how prevention strategies are working to maintain the integrity of organic crop production systems.

Avoiding contamination requires organic farmers to take preventative measures, and conventional farmers to adopt practices as good neighbors to help organic farmers avoid contamination, but organic farmers cannot always count on this cooperation. For these instances **we need policy research to provide conventional growers with an incentive to take prevention measures, which will also focus on mandatory compensation mechanisms paid to farmers that experience contamination.**

Food Handling and Processing

1. Alternatives to Bishpenol-A in organic product packaging

BPA poses serious hazards and OEFFA supports its elimination from organic food packaging. At the same time, since known alternatives to BPA may also present similar problems, the NOSB should approach the issue of food packaging in a comprehensive way. Research on alternatives would help inform NOSB discussion on organic packaging moving forward.

Water quality

1. In Ohio, Iowa and many other areas around the country there are growing concerns about agriculture impacts on water quality. Whether the concerns relate to nitrogen or phosphorous, states and farmers are being looked to urgently for solutions. This is another opportunity to highlight the positive role that organic farmers play in stewarding water resources and yet there is a distinct lack of water quality research that includes organic farmers. We urge the NOSB and the NOP to share this message widely with research audiences. The funding for organic research has never been higher. We should not shirk this growth opportunity.

FORMER DISCUSSION DOCUMENT: ASSESSING CLEANING AND SANITATION MATERIALS USED IN ORGANIC CROP, LIVESTOCK, AND HANDLING

The organic community would benefit from a comprehensive review of sanitizers, disinfectants, and cleaners. It is very difficult to evaluate the essentiality of proposed materials, whether a petitioned new material or a review at sunset, in the absence of such a comparative analysis.

OEFFA has noticed three varying levels of scrutiny when reviewing cleaning materials, especially sanitizers:

- Certifier looks only at the active ingredients on the label of a product and does not consider other ingredients; actives must be non-synthetic or on the National List.
- Certifier looks at a full list of ingredients. Active ingredients on the label must be non-synthetic or on the National List. Other ingredients must be present on the Technical Evaluation Report for the active ingredient(s).
- Certifier looks at a full list of ingredients; all ingredients must be non-synthetic or on the National List.

OEFFA Certification currently follows the second option because we believe that the intent of the Board and organic community is best embodied in that approach. However, this limits the availability of approved sanitizers to producers.

We support the request for a Technical Review for each active sanitizer ingredient to provide a foundation for this broader review and the pragmatic idea to have a reference document that could be

passed to future NOSB members. The Technical Review should include a “standard of identity” for the active ingredient which includes common inert ingredients that accompany it. It is our understanding that the NOP has not put this Technical Review topic out for bid because the topic is viewed as being too unwieldy or broad. That is precisely why we need to get started with such a technical review, so we urge the NOSB and NOP to support the need for a Technical Review, even if it is not all-encompassing at this time.

In the course of reviewing each sanitizer, NOSB would evaluate the full list of ingredients (including common inerts) against the criteria in OFPA. This process would happen every three years and could include revisions of the Technical Review to include new ancillary/inert ingredients as necessary. If new ancillaries are not in keeping with OFPA, the listing could be annotated to exclude those specific formulations. For example, “Chlorine materials, *except* chlorine materials containing quaternary ammonium compounds.” Materials review organizations would then review only the listed active ingredient in a sanitizer product unless the National List entry for that active included an annotation (and then would review inerts/ancillaries as well).

We think the proposed evaluation criteria and list of materials classified by their active ingredients are a great start and appreciate NOSB’s acknowledgement of previous comments and desire to move this topic forward. We urge the NOP to support NOSB by issuing a Technical Review to begin this important work.

POLICY DEVELOPMENT SUBCOMMITTEE

PEER REVIEW

It is a realistic expectation that clear, consistent assessment and ongoing attention to improvement through a robust peer review process will ultimately trickle down to clarity and increased consistency among certifiers and certified operations. Because we believe NOP must be held to high levels of transparency, we are disappointed that NOP has refused repeated requests by the National Organic Coalition (NOC), to make public the full results from the 2018 American National Standards Institute (ANSI) peer review panel report, and has removed from the USDA website the full results from the 2016 report, which had been previously shared publicly. We ask ourselves, whom does this lack of transparency serve?

From our perspective, for the peer review audit process to be effective, the peer review entity must have the ability to track the NOP’s corrective actions and compliance with issues that have arisen in previous peer review audits, just as a certifier would do with a certified operation, or in the same way that ACA audit results are tracked over time, and shared publicly online. In this way, the peer review panel would be able to address concerns and track improvements over time. As such, the NOP’s compliance with recommendations from the 2016, 2017, and 2018 peer review audits should be

considered as a part of the 2019 peer review audit. The peer review panel membership should be determined by an outside entity, which might include members of the NOSB, and it should have the authority to request any files and look at any certifiers that it determines to be appropriate.

In order to move in a more productive direction, OEFFA urges the NOSB to insist upon access to the full results from the peer review audits conducted each year by ANSI. The Board should pay careful attention to the findings of ANSI reports and use this information to identify areas in need of input by the board. Addressing systemic challenges at the NOP level has the potential to mitigate systemic challenges at the certifier and producer/handler levels. Because we are all in this together, we must hold ourselves and one another to high levels of accountability and transparency.

[SUBCOMMITTEE NOTES, WORK AGENDA ITEMS, AND THE OPEN DOCKET](#)

Thank you to the NOSB and NOP for the return of the subcommittee notes. We all benefit from better communication between NOSB meetings and appreciate your efforts at transparency. However, there has been a challenge with the functionality of these notes this past semester. The notes are increasingly sparse and are posted so late it is difficult to utilize them in full preparation for the meeting. We request timely posting of the notes for the utility of the community.

Similarly, we request greater transparency with regard to work agenda requests and rationale. It makes sense that both requests for work agenda items to be added, and updates as to the status of those requests be shared with the community. If a work agenda item is denied, the public should understand why that decision was made. **Ideally, the NOSB, as an independent advisory board, ought to have complete control over its own work agenda.**

We also appreciate the efforts at promptly sharing NOSB meeting materials. Thank you for getting these out so we had a full month for review and drafting with the materials in hand.

While we appreciate opening the docket soon after the NOSB meeting has ended, we feel certain there must be a way to facilitate greater fluidity of information and collaborative work among the NOP, the NOSB members and the entire organic community. With the intention of restoring greater transparency and fostering open communication, we request the following:

- 1) The role of the Advisory Board Specialist (ABS) as described in the PPM on pages 11-12 includes the following:
 - Arranging, facilitating, and documenting the NOSB Subcommittee conference calls
 - Ensuring NOSB members have all necessary materials and information to provide informed, structured and timely recommendations to the NOP

We suggest that the first point be revised to: “Arranging, facilitating, and documenting the NOSB Subcommittee conference calls. Documentation must include topics discussed, a summary of the discussion, motions made, and votes on motions.” This request is further supported by General Records Schedule 6.2,^[1] which requires that such records must be maintained “permanently” and be made available to the public. They include:

Records that document the activities of subcommittees that support their reports and recommendations to the chartered or parent committee. This documentation may include, but is not limited to:

- meeting minutes
- transcripts
- reports
- briefing materials
- substantive correspondence, including electronic mail, exchanged between one or more subcommittee members, any other party that involves the work of the subcommittee, and/or agency committee staff (such as the Designated Federal Officer)
- background materials.

We would happily utilize this more detailed information in addition to the well-organized grid that was more recently provided to better do our work and provide information to NOSB.

^[1] <https://www.archives.gov/records-mgmt/grs/grs06-2.pdf>. The PPM, page 12, requires, “Records of the NOSB shall be defined and handled in accordance with General Records Schedule 6.2 or other approved agency records disposition schedule.”

LIVESTOCK SUBCOMMITTEE

PROPOSAL: USE OF EXCLUDED METHOD VACCINES IN ORGANIC LIVESTOCK PRODUCTION

OEFFA regards vaccines as a necessary tool for farmers to maintain the health of their livestock.

We know that we cannot continue as we currently are, with inconsistency among certifiers regarding the use of GE Vaccines.

We are concerned, however, about the commercial availability search, as GE information may not be provided so readily by vaccine manufacturers, many of whom consider their formulations proprietary, as it is by seed dealers (who typically advertise the presence of GE). Livestock producers in rural areas and/or without internet access would be put at a distinct disadvantage to determine commercial availability.

To reduce redundancy among material reviews conducted on the same set of vaccines by multiple certification bodies, to provide a fair playing field to all livestock producers, and due to the (often) proprietary nature of vaccine formulations, OEFFA suggests that the commercial availability review be undertaken centrally. Perhaps NOP could contract with OMRI or an ACA with significant materials review experience to create and maintain such an online list on behalf of the community. That way, certifiers such as OEFFA could include a paper list with Organic System Plans for those producers who do not use the internet.

2021 Livestock Sunset Reviews

(PARASITICIDE) FENBENDAZOLE

(PARASITICIDE) MOXIDECTIN

HYDROGEN PEROXIDE

PERACETIC ACID

IODINE [205.603(A) AND 205.603(B)]

TRACE MINERALS

VITAMINS

OEFFA Supports the continued listing of Fenbendazole, Moxidectin, Hydrogen Peroxide, Peracetic Acid, Iodine, Trace Minerals, and Vitamins on the National List for use in livestock production.

METHIONINE

OEFFA has noticed an increased use of metal methionine hydroxy analogue chelates, or, in common language, synthetic methionine stuck to copper, manganese, or zinc. We have allowed the use of such chelates under §205.603(d)(2), "Trace minerals, used for enrichment or fortification when FDA

approved,” because these substances are AAFCO approved as sources of these minerals. Typically, however, synthetic methionine use would be regulated under §205.603(d)(1), which specifically addresses DL-Methionine. This work-around underscores the urgent need for natural methionine sources within a holistic, systems-based approach to poultry production.

Previously, OEFFA has advocated **systems-based research aimed at eliminating DL-Methionine in organic poultry feeds and investigating the impacts of natural methionine feed sources, breed, and high-welfare management strategies simultaneously**. Substantial research has already been conducted investigating isolated strategies for raising chickens organically and humanely without synthetic amino acid supplementation. If we do not spend time investigating natural methionine sources in a systems-based approach, creative ways of including synthetic methionine in poultry diets will continue to proliferate.

[DISCUSSION DOCUMENT: EXPANDING THE USE OF FENBENDAZOLE TO POULTRY PRODUCTION](#)

OEFFA urges the Livestock Subcommittee to request a poultry-focused Technical Review (TR) on this topic. The existing TR from 2015 does not specifically address the use of fenbendazole with regard to poultry production, and therefore does not provide the information necessary to make an informed decision.

Regarding the questions posed by the board:

Questions:

1. Is this material needed by organic poultry producers? If so, why?

OEFFA Materials review staff stated that no producers have requested the use of parasiticides for poultry in the last year.

4. Is there a concern with the 2.4 ppm residue of fenbendazole in eggs? Please submit information that supports this concern, or lack of concern.

A Technical Review would help determine the appropriate “withdrawal” period for eggs laid by hens treated with fenbendazole. Fenbendazole residue in eggs would not benefit organic producers or consumers, so care must be taken to ensure parasiticide residue would not contaminate organic eggs.

Further, we appreciate the board noting the “emergency” language that was previously recommended by the NOSB in Spring of 2018, and we urge the NOP to move forward with those changes. The role of the NOSB in advising the Secretary, and ultimately the NOP, only functions if the NOP takes timely action in response to recommendations.

ADDITIONAL TOPICS

MUSHROOM STANDARDS

OEFFA views the transparent public process as the backbone of the organic industry and clear and consistent standards as paramount. We, like many ACAs, have certified Mushrooms for some time utilizing the seed standards that exist in the regulations. We would prefer actual mushroom standards by which to certify organic fungi. Recent decisions by NOP regarding mushrooms and discussions that those actions resulted in make it clear that there is not a level playing field for all organic mushroom producers. **We can best resolve these issues through the public process to develop clear and consistent standards. Please add the development of mushroom standards to the NOSB work agenda.**

WHEN NOSB MEETINGS ARE HELD

OEFFA farmers consistently express frustration regarding the timing of NOSB meetings. **The spring meeting comes at a tough time for mixed vegetable producers, and the fall meeting is a challenge for grain growers in the Midwest.** In fact, OEFFA grain growers have been known to say, “They clearly don’t want us at these meetings.” Unfortunately, these challenges extend beyond attendance at the meeting and include finding the time to respond to meeting materials that are published in such close proximity to the deadlines for public comment.

We know it’s not your intention to exclude producers from attendance at NOSB meetings, and we value the effort that goes into moving the meetings around the country. As such, please consider holding one of the meetings each year in the winter--perhaps in January. While we recognize this will still present a challenge for those organic producers in other climates, this timing would enable substantial sectors of the organic community to take a more active participatory role in communication with the NOSB.

On behalf of the Ohio Ecological Food and Farm Association and OEFFA Certification,



Carol Goland, Ph.D.
Executive Director