



National Organic Coalition

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Lisa Ahramjian, Executive Director
National Organic Standards Board
USDA-AMS-TMP-NOP,
1400 Independence Ave., SW., Room 2646- South Ag Stop 0268,
Washington, DC 20250-0268

RE: Document Number AMS-NOP-10-0068; NOP-10-08

National Organic Standards Board:

The National Organic Coalition, (NOC) is a national alliance of organizations representing farmers, environmentalists, other organic industry members, and consumers concerned about the integrity of national organic standards. The goal of the coalition is to assure that organic integrity is maintained, that consumers’ confidence is preserved and that policies are fair, equitable and encourage diversity of participation and access.

NOC would like to thank the Board for its ongoing long hard work in reviewing materials and issues pertinent to the integrity of the organic label. We would also like to take this opportunity to thank in particular the out-going members of the Board for devoting so much of your time during the past 5 years to the work of this board: Dan Giacomini, Jennifer Hall, Kevin Engelbert, Jeff Moyer, and Joe Smillie.

Following are the comments of the National Organic Coalition to the NOSB [click on page number to link directly to the page]:

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INERTS IN PESTICIDES

We echo the sense of urgency noted in the minority opinion of the Crops Committee regarding EPA [formerly] List 4 Inerts. Noting that “it is critical that the now defunct EPA ingredient listing process, on which the Board relied, be replaced as soon as possible by a new system of review, based on collaboration between EPA, NOP and the NOSB,” they recommend a shortened timeframe for their continued use. We encourage the Board to vote to expedite the implementation of the inert guidance adopted by the Board in April 2010, and limit the time frame for relisting on the NATIONAL LIST those chemicals “formerly on List 4” to 3 years.

The importance of this issue for the integrity of organic cannot be overstated. It is time that the inerts policy be re-evaluated to reflect current science. It is clear from EPA and from scientific evaluation that former List 4 materials may not be either “inert” nor are they “of minimal concern.” They are often toxic and harmful to the environment.

With a strong statement from the NOSB acknowledging the potential harmful effects of some of these ingredients, the message to the industry will actually be clear and potentially pro-active. Manufacturers using former List 4 ingredients can themselves refer to the EPA re-evaluations and begin to reformulate their products knowing that the NOSB (along with NOP and EPA) will be taking a hard look, and that the timeframe will be short. Their initial screen would be the principles of organic, as well as 205.601¹ – if an inert is deemed by EPA to be harmful to the environment, then a manufacturer can be sure that it will not be on the NATIONAL LIST. It is imperative that while NOSB decisions may use industry disruption as a factor in their decisions, that criterion should be the primary basis for decisions. Evaluations of the NOSB should be based on independent science, not on pressure from the manufacturers that their sector will be ‘disrupted.’

HOPS

For comprehensive and technical data regarding this issue, we support the comments of the American Organic Hops Growers Association (AOHGA).

Hops is one of those chicken/egg dilemmas for the organic industry. Currently, non-organic hops are permitted in organic beer because hops are subject to the “commercial availability” clause associated with §205.606 of the National List. When the listing for hops was added to this section of the List, there apparently weren’t enough organic hops being grown to create a sufficient supply. However, more recently, we have heard from hops growers and the American Organic Hops Growers Association. Accredited Certifiers Association’s (ACA) “606 website” also lists hops, confirming that the production of organic hops has increased to the point where the product is much more readily available.²

¹ **§ 205.601 Synthetic substances allowed for use in organic crop production.**

In accordance with restrictions specified in this section, the following synthetic substances may be used in organic crop production: Provided, That, use of such substances do not contribute to contamination of crops, soil, or water.

² ACA’s listing of organic products may be viewed at: <http://www.606organic.com>

Because different hops varieties each confer a specific flavor profile in beer, hops are not widely grown on speculation – there may not be a large open market for a generic hops variety. Therefore, organic hops growers are finding that without a requirement for using organic hops to brew organic beer, there is little impetus for the industry to buy organic hops, nor for the industry to contract production of specific hops variety. As a result, the hops varieties required to produce a manufacturer's unique flavor profile may not be being grown organically.

Here's the rub: There are not enough organic hops of specific varieties for all the US organic beers because they are not being grown at this time. This is because due to Confidential Business Information, growers don't know which varieties are needed, and brewers are not contracting directly for production of the varieties of hops they need because use of organic hops is not required by the NOP regulation.

This is the perfect opportunity for the NOSB to remove a material from the list and allow demand in the organic marketplace to encourage increased production of both the total amount and different varieties of organic hops.

The organic hops growers have come together in an Association (AOHGA), to provide evidence to the NOSB that there are enough certified acres to be able to supply the industry, and to make the case that it is time to remove the exemption for use of non-organic hops from the National List.

Unfortunately, the Handling Committee has determined, through methods that are not transparent to the public or to the organic hop growers' association, that requiring organic hops would "negatively impact the brewing industry." NOC has not seen nor heard of the "significant number of public comments for the Spring 2010 meeting" that document the hardship referred to by the Committee. Further, we disagree with the committee's opinion that a temporary hardship is a sufficient basis continuing the exemption that allows use of non-organic hops in organic beers. We would like the handling committee to make these comments public so that NOC and the hops growers can respond to them directly.

We quote from the AOHGA: "The NOSB's recommendation sets forth an unreasonable standard that will discourage present and future organic hop production. The committee provided no guidance to growers as to how many organic hop varieties are necessary before hops could be removed from the National List, nor have they named one type or style of beer that cannot be brewed with the organic hops that are commercially available in the market today. As long as a single organic brewer can cite the unavailability of a particular hop variety in the spot market as justification for hops continuing on the list, hops will remain on the list indefinitely, and the U.S. organic hop industry will suffer dramatically."

It is time for hops to come off §205.606 of the National List. In addition, we suggest that the Crops Committee should have been a part of this particular 606 review, as well as future reviews of all of agricultural products. Besides bringing expertise about crop production, the crops committee has strong contacts with farmers so that this sector can be included in the research used as the basis for committee recommendations to the NOSB.

CHIA

NOC notes that organic chia growers are also listed on the ACA's 606 website, and we are curious as to why the recommendation for their continued listing was made on the basis of "no new information..."

NOC asserts that postings indicating availability of organic chia on this website is sufficient new information, to warrant re-review at Sunset. While we understand (perhaps not agreeing) the NOSB claim that re-review of all sunset materials would be onerous, it seems that the existence of ACA's website -- designed to guide certifiers on commercial availability of specific crops -- would be a quick way to check on producer's efforts to make crops commercially available. We recommend this as a first step in the Committee's work to determine whether there is sufficient availability of a crop to support removing its listing from §606 of the National List.

SODIUM NITRATE

We are opposed to the continued use of Sodium Nitrate in organic production and support its permanent sunset from the National List. When this material was allowed in the original 1995 decision by the NOSB (see attached), the decision was made after much discussion, and only when an annotation that restricted the amount that could be used, coupled with a provision intended to lead to substantial reduction of the material's use over time. The recommendation stated:

"Certifiers will monitor progress in the reduction of Chilean Nitrate use and will decertify farmers that develop long term dependence on this material."

Anecdotal evidence confirms the use of sodium nitrate has indeed declined, mainly because it is not allowed by the regulations promulgated by the other major organic regulatory authorities around the world.

Because of its high solubility, sodium nitrate is an example of a material that is prone to use in production systems based on "input substitution", and is often used to facilitate continuous cropping as opposed to restoring fertility through cover cropping. These practices are antithetical to the principles of organic, specifically NOSB Principles: 1.1, 1.2.2, 1.2.6, and 1.2.7.

Therefore, we agree with Miles McEvoy's September 21, 2010 memo to the Board requesting that the NOSB consider prohibiting this material. We encourage the NOSB to remove the annotation for Sodium Nitrate which allows its use.

NANOTECHNOLOGY

Nanotechnology is a new technology producing new materials that pose a significant threat to health and the environment. We appreciate the work of the Materials Committee in proposing a definition of *engineered nanomaterials* as "substances deliberately designed, engineered and produced by human activity to be in the nanoscale range (approx 1-300 nm) because of the very

specific properties or compositions (e.g. shape, surface properties, or chemistry) that result only in that nanoscale.” We also support excluding traditional food processing techniques from the nano definition such as milling, churning, freezing and homogenization and excluding naturally occurring particles at the nanoscale as well. These processes may inadvertently create nano-sized particles which is not the same as deliberately engineering particles at the nanoscale to take advantage of new attributes such as size, spreadability, durability, all of which pose novel health threats as well.

We append here a description from the Center for Food Safety of potential health threats posed by Nanotechnology:

Nanotechnology involves the deliberate engineering of materials, structures, and systems at the atomic and molecular level. The greatest threat of nanoparticles is that they can cross biological membranes, cell, tissues, and organs more readily than larger particles. When inhaled, they can go from the lungs into the blood system. Some nanomaterials may penetrate intact skin and gain access to systemic circulation. When ingested, nanomaterials may pass through the gut wall and into the blood circulation. Once in the blood stream, nanomaterials can circulate throughout the entire body and lodge in organs and tissues including the brain, liver, heart, kidneys, spleen, bone marrow, and nervous system. Inside cells, they may interfere with normal cellular function, cause oxidative damage and even cell death. [cfs]

However, the NOC is disappointed that the committee is recommending no action on the issue of Nanotechnology in organic. We believe that NOSB has overwhelming information to prohibit nanotechnology in organic production at this time, and are in full agreement with the Committee’s opening statement that there is “overwhelming agreement within the organic industry to prohibit nanotechnology in organic production and processing.” Such a prohibition would send a strong message to the industry that even packaging and food contact surfaces must not be made with nano-materials.

Additionally, we strongly oppose the recommendation to allow the petitioning of nanomaterials on to the National List of Prohibited Substances (NL). This would keep open the option for companies to apply for exclusions to the prohibition of nano on a case-by-case basis and, subsequently undermine the effectiveness of the prohibition. We fear this could put a heavy burden on the NOSB to continually re-review the health and safety of the technology itself with each individual petition, and be in a position to review one “not quite as bad as the last.”

Nanotechnology is antithetical to the letter and spirit of the Organic Foods Production Act (OFPA) which governs all aspects of organic production and, therefore, it must be prohibited under section 205.105. Nanomaterials must be strictly prohibited in the organic rules without any caveats or exceptions whatsoever.

CORN STEEP LIQUOR

We agree with the Crops Committee recommendation to reclassify Corn Steep Liquor (CSL) as a synthetic material. We also agree that this is another watershed issue for the board, and are especially appreciative of the Crops Committee’s latest discussion paper on this topic (October 7,

2010), which delves into the chemistry of the reactions of the corn steeping process and supports its discussion with appropriate citations.

NOC supports the decision making process used for this material and urges that the Board use a similar method for evaluating all materials petitioned for use in crop and livestock production systems. That is, first determine whether the material is synthetic or nonsynthetic. Then, if declared synthetic, consider a petition to add the material to the National List..

With regards to the definition of chemical change, we encourage the board to resist convoluted definitions that not only serve to make future NOSB decisions more difficult, but also make it even more difficult for consumers to understand what goes into the organic products they buy. We concur with the NOP's analysis of NOSB's most recent definition of the term "chemical change," agreeing that the definition is "contrary to common understanding". Even for those of us who are chemistry-challenged, declaring that processing agricultural products with materials on the National List does not result in chemical change is absurd. What is clear, is that if a substance is chemically changed, it is synthetic.

Chemical change – An occurrence whereby the identity of a substance is modified, such that the resulting substance possesses a different distinct identity. (See related definition of "substance.")

Synthetic – "A substance that is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes." (7 CFR 205.2)

Finally, with regards to CSL, we are concerned about possibly significant residues of sulfur dioxide (SO₂) in the finished product that results from both the traditional wet-milling process, as well as recent new processes. As CSL has been used in livestock feed, the higher sulfur content of materials produced with sulfur dioxide can have deleterious effects on livestock health.

As a result, NOC reinforces the need for further research on Corn Steep Liquor as well as petitions for specific uses in crop and livestock systems.

SUNSET REVIEW PROCESS

We appreciate the work that has been done on Sunset Review Policy since the last meeting; the refinements and changes more closely resemble the original thinking of the NOSB regarding the sunseting of materials.

This historical perspective is important because many materials were approved only with the understanding that their use would be entirely re-reviewed, as reflected in the following quote from founding chair, Michael Sligh:

"The original votes for these materials were very close and this common understanding that these materials would not necessarily remain on the approved list forever without periodic review and complete petitions clearly stating why they were still necessary

was key to the original allowance. In fact, it was assumed as better choices became available many of these materials would indeed - sunset. The original recommendations for these materials also included specific use allowances or annotations on use.”

Annotations

We strongly support the discussion in the proposal related to the critically important ability of the Board to add or expand materials’ use restrictions (annotations) during the sunset process. We assert that this is absolutely imperative for a properly-functioning sunset review process. If modifications to annotations were not allowed during the sunset process, the original intent of previous decisions may be compromised. Additionally, an increased burden for review of petitions for individual annotations may be created. We also support the clarification of the voting protocol for the Board.

We wholeheartedly encourage the Board to amend its policy *as soon as possible* to allow the amendment of annotations during the sunset review process, as outlined in this recommendation (that is, further restrictions may be added, but expansion of use may not).

Technical Review Panel

We are concerned about the reliance on “Technical Reviews” to the exclusion of the former “Technical Review Panel” (TAP). While in some cases, the streamlining of review in both time and cost through a single review(er) is appropriate, we still believe that a full TAP review is warranted in cases of both original review of materials and the sunset process. Clearly, when the material is significantly complicated or controversial it would greatly benefit the NOSB to be able to request assessment by a panel of experts rather than being forced to rely on findings generated by a single reviewer. A broader range of research and conclusions would greatly assist the board in being able to sift through issues raised by significant (either in numbers or in substance) public comment. It would also provide the public with greater confidence that extensive scientific review was used as the basis of the Board’s decision, as opposed to information that had been generated solely from industry sources.

In general, the National Organic Coalition finds that the policy on Sunset Review proposed by the Policy Development Committee to be acceptable, with the following qualifications:

1. Use of the more comprehensive “Technical Review Panel” (TAP) consisting of 3 independent reviews, rather than the single Technical Review for issues that are complicated or controversial;
2. Revision of the Board Policy Manual to include the allowance of amended annotations (as outlined in this recommendation) during sunset review.

§205.236 ORIGIN OF LIVESTOCK

NOC supports the comments of (NOC Member) the Northeast Organic Dairy Producers Alliance:

We understand that is a priority for the NOP to clarify the regulations on the organic certification of livestock, **§205.236 Origin of Livestock**, with a proposed rule in early 2011 and we offer these comments at this time:

The preamble of the December 21, 2000 Federal Register National Organic Program Final Rule contains several statements (page 80570) that frame the principles the Rule Writers intended regarding dairy herd conversion and dairy replacement animals, including the following:

- *After the dairy operation has been certified, animals brought on to the operation must be organically raised from the last third of gestation.*
- *The conversion provision also rewards producers for raising their own replacement animals while still allowing for the introduction of animals from off the farm that were organically raised from the last third of gestation. This should protect existing markets for organically raised heifers while not discriminating against closed herd operations.*
- *A whole herd conversion is a distinct, one-time event.... It is a one-time opportunity for producers working with a certifying agent to implement a conversion strategy for an established, discrete dairy herd in conjunction with the land resources that sustain it.*
- *...the conversion provision cannot be used routinely to bring non-organically raised animals into an organic operation.*

These Preamble statements coalesce to 3 principles:

1. The opportunity for a producer to convert a conventional herd of dairy animals to organic production is a onetime event per producer. This is clearly mentioned in two separate statements.
2. Once the operation has been certified, all animals brought onto the farm must be organic from the last third of gestation. This is clearly stated in the first and fourth statements.
3. There is no allowance to move transitioned animals from the operation on which they were transitioned to another certified organic operation. The preamble states specifically that the provisions allow “*for the introduction of animals from off the farm that were organically raised from the last third of gestation*”, making no mention of also allowing the introduction of transitioned dairy animals from off the farm.

Our suggested language for § 205.236 (a) (2) (iii): **Dairy animals – replacement stock.** **Once a dairy operation (or that of any responsibly connected party) has been converted to organic production, all dairy animals (including young stock) shall be from sources under organic management from the last third of gestation.**

ANIMAL WELFARE

The National Organic Coalition supports strong animal welfare standards for all animals in organic production, and heartily agrees that “Animal welfare is a basic principle of organic production” (NOSB recommendation). We also know that consumers expect organic animals to be treated humanely, and “be able to perform species specific behaviors and enjoy as natural and normal a life as possible” (NOSB recommendation).

We note that consumer expectations have led to the proliferation of animal welfare labels and standards, and have been distressed that, in the face of such specificity, organic has been left behind with regard to animal welfare standards. It is long past the time for the Board to ensure organic standards incorporate stringent animal welfare standards into all appropriate portions of the regulations.

We are pleased with the dairy pasture standard, and encourage the department to include a “grass-fed” claim at least as an additional verifiable part of the beef standard (see attached our proposal, as submitted to NOP). We opposed second story porches in poultry production at least as far back as 2002, and further reference our consistent comments related to outdoor access for poultry as part of the solution to the continued allowance of synthetic methionine in the chickens’ diet.

NOC acknowledges the difficulty of challenging the current culture of animal production that emphasizes the need to keep animals indoors. This thinking is clear in industrial models of livestock production and also exists in non-industrial systems. However, the culture has begun to change in many species (dairy, beef, swine, and yes, poultry), with hard data to back up the animal and human health benefits from such changes. We believe that it is possible for organic to take the lead in setting standards for ample outdoor access for all livestock species.

Other animal welfare issues are also important, and many are laid out in the proposal from the Committee, which we fully support. We also encourage review of other animal welfare labels to inform additional animal welfare standards. NOC believes that the organic label should be the high bar when it comes to all animal welfare standards.

APICULTURE

NOC supports the current NOSB recommendation for organic apiculture production. These standards are practical and in harmony with other areas of our organic regulation as well as EU and Canadian regulations. The NOP should be encouraged to expedite the implementation of this recommendation, since currently organic bee products being sold with the USDA organic seal have significantly different methods of production. For the integrity of the organic seal, as well as the confidence of the consumer, we support this well constructed and complete organic apiculture standard.

INDUSTRY CHALLENGE: PROACTIVE APPROACHES TO THE NATIONAL LIST

We believe that the organic industry should take responsibility for the continued integrity of the organic label with regards to materials on the National List. Whenever new information regarding materials on the National List becomes available, it behooves the industry to re-evaluate their product ingredients, based on organic principles, even prior to the NOSB making a ruling.

Were this to occur, when the NOSB began re-review of a material they would see an industry ahead of the regulatory curve, one that would inform the NOSB’s decisions on materials and possibly facilitate the NOSB’s decisions on materials.

In NOC's view, it is not helpful to treat the materials review process as an opportunity to approve as many synthetic or non-organic ingredients as possible. The consumer expects the label to represent products that are as free as possible of toxics, synthetics, and non-organic ingredients.

While this proposal is not regulatory, it is a call to action to our colleagues in the industry. We believe that the added value of the organic label is inextricably linked to the responsibility to uphold the principles and values of organic. While this principle may not be common in most business sectors, it is at the very foundation of the organic industry.

How would this work--two examples:

1. **Inerts.** Right now, manufacturers of pest control products which currently allow "List 4 inerts" are as aware as the rest of us that this list no longer exists, and that EPA is reviewing inerts on this obsolete list for toxicity, and negative environmental impacts. We would like to see organic manufacturers proactively remove "inerts" from their products that have been determined by EPA to have toxic effects as soon as EPA makes public such information. Further, suppliers of these materials, might inform NOSB that they are reformulating, which would greatly assist NOSB as it reviews each of these materials.
2. **Hops.** Now that there is clearly a critical mass of organic hops growers in the U.S., it behooves the organic beer industry to develop contracts with growers of this crop, even before the requirement being mandated by NOP. In addition, certifiers are already on notice that there are some suppliers of organic hops and should be requiring due diligence from brewers to source organic hops. Were the organic industry taking these proactive steps, NOSB's decision-making would be expedited.

Finally, we propose: **"Raising the Bar" on 606 Petitions**

- a. We believe it is time to consider a proactive idea for evaluating "commercial availability." We would like to see every petition for a material proposed for §205.606 to include a timeline and a plan (over the subsequent 5 years) for the material's eventual removal from the List. Specifically, each petition would include information to address the following questions:
 - i. What are the current possible alternatives for use of the material?
 - ii. How will these alternative be developed within the next 5 years?
 - iii. Who are the natural partners for this development?

Obviously, this will require some new thinking -- currently petitioners have an interest in the material they are petitioning, and do not necessarily have interest, access, or even ability to develop an alternative. Our proposed policy would force petitioners to research alternatives during the process of drafting their petition, and require careful evaluation of the need for the material by the sector that relies on it.

There are also obvious criteria beyond whether a specific form of an agricultural product is currently available as organic, which should be required within 606 petitions. Such items should include, but not be limited to, the following:

- i. If the product is produced overseas with insufficient or spotty organic production, could it also be grown on contract in the United States?
- ii. If the product is currently only available in nonorganic form, has the petitioner tried to work with contract growers to have their current suppliers transition land to organic production?
- iii. Are all forms of the product unavailable as organic, such as raw, dehydrated, juiced etc., or is it only unavailable as organic in a highly processed form; and could the petitioner contract processing of the raw organic products into the form needed for the product?
- iv. Has the world market for organic products been searched, (not only the United States' market), to determine commercial availability?
- v. Is the petitioner's request based mostly on cost of the organic product, or on the expense of transporting it to their facility, rather than the definition of commercial availability in the OFPA?

NOC requests NOP's feedback on these draft proposals, and we would also like to see a NOSB committee or task force develop criteria that deal with the special needs of 606 materials.

Once again, we thank the Board for its work, and appreciate the opportunity to make this public comment.

Sincerely,



Liana Hoodes, Director

Attachments: *NOC Proposal For Additional Grassfed Label (April 19, 2010)*
NOSB Chilean Nitrate Special Use Guidelines, November 1, 1995

NOC PROPOSAL FOR ADDITIONAL GRASS-FED LABEL (April 19, 2010):

Unfortunately, the allowance for finishing beef on grain leaves a perception in the marketplace that the organic label is without a verified Grass-fed Label. Clearly this new rule verifies all ruminants' rations, but without a labeling regime, Organic does not mean Grass-fed. Beef producers who wish to label their product "Grass-fed" are confined to a less stringent, and separately-verified (or unverified) set of labels from USDA, as well as private labels. Since certified organic farmers are used to verification of all their production practices, and this new Rule includes a verification of feed rations of each livestock herd, it would seem logical that the organic label provide for the possibility of a verified organic Grass-fed label under the organic regime.

Currently, there is confusion for both producers and consumers because there are three methods in which an organic Grass-fed producer could label their product Grass-fed:

- 1) "USDA Process Verified" – the current verification for organic or conventional Grass-fed Label, which involves unnecessary additional verification for certified organic;
- 2) No verification (if they fall within the current FSIS unverified label);
- 3) Verification under their organic certification (individual certifiers are beginning to do this).

This is a problem of an uneven playing field for organic producers who are going through extra organic certification verifications versus organic or conventional producers who choose another method. This is then obviously a problem for consumers to clearly understand what they are getting in the marketplace when they buy "Grass-fed."

A NOP-certified Grass-fed Label would eliminate this confusion by providing only one path for the use of "Grass-fed" by organic producers. It would provide the consumer with a clear and transparent Organic Grass-fed label that gives assurance of independent, third-party verification of both "Grass-fed" and other organic values which do not exist in other labels.

We propose that the NOP simply work out an agreement with AMS Grass-fed, FSIS Grass-fed (or both, if appropriate) to administer the use of the Grass-fed label for organic producers. Any organic producer who wishes to use the term "Grass-fed," would need to be inspected to that label through their organic certification. This may be easily accomplished through guidance and possibly an MOU or other agreement with other agencies at USDA who are involved with the Grass-fed label. This method would assure a swift movement on this proposal so it could be implemented within the same timeframe as the rest of the final Rule (i.e., by June 2011).

NATIONAL ORGANIC STANDARDS BOARD
FINAL RECOMMENDATION ADDENDUM NUMBER 27

CHILEAN NITRATE SPECIAL USE GUIDELINES

Date adopted: November 1, 1995
Location: Austin, Texas

Recommendation:

The use of Chilean Nitrate (16-0-0) in organic crop production is limited to not more than 20 percent of total nitrogen supplied to a crop. The producer's Farm Plan shall contain specific provisions and strategies designed to substantially reduce the use of Chilean Nitrate over time. The amount and timing of these reductions will be consistent with documented site specific constraints. The Farm Plan will seek to explore each and every alternative to the routine use of Chilean Nitrate in the farming system. These alternatives include, but are not limited to: composting, improvement of compost, leguminous cover crops, interplanting, rotations, microbial enhancements, animal manures, varietal selections, planting date alterations, and reducing amounts of applied supplemental nitrogen. The timing and efficiency of Chilean Nitrate applications shall be optimized and documented in the Farm Plan. Certifiers will monitor progress in the reduction of Chilean Nitrate use and will decertify farmers that develop long term dependence on this material. Strong farmer commitment, aggressive action, and measurable results are all necessary elements of this special use of Chilean Nitrate.

This policy shall be reviewed within two years.

CHILEAN.07E