



*Commentary and Introduction; A series of articles on organics*

# Checking Our Organic Coordinates

Where have we been and where we need to go from here

by Jay Feldman

The April 26-29, 2010 meeting of the National Organic Standards Board (NOSB) brought with it both a sense of opportunity and challenge. This was the first NOSB meeting for me as a board member. The hundreds of people dedicated to organic principles in attendance, full day of public testimony, and hundreds of pages of public comments represent a process that is focused on the integrity of organic standards and practices. The organic movement, community and industry have developed with a strong commitment to public involvement and transparency in its process, and the allegiance to this core value is renewed at every board meeting.

## Organic is the solution

With all the bad environmental news these days, the importance of organic practices grows daily. We must eliminate our reliance on synthetic chemicals to the greatest extent possible and as fast as possible to avert the collision course we are on with our future health and environment. On cancer alone, a full chapter of the President's Cancer Panel report, *Reducing Environmental Cancer Risk: What We Can Do* (May 2010), is devoted to agricultural chemicals. The chapter begins, "The entire U.S. population is exposed on a daily basis to numerous agricultural chemicals. Many of these chemicals are known or suspected of having either carcinogenic or endocrine-disrupting properties." It continues, "[B]etween three and five million individuals and their families work as migrant or seasonal workers. Due to working and housing

conditions, including lack of child care that forces parents to take their children with them into the fields, these workers and their families often have disproportionate exposures to pesticides and other agricultural chemicals."

Organic is no longer a niche market for the few, but a system that ensures the well-being of all—because the issues defining organic methods intersect with questions of human and environmental health. To sustain the growth necessary to overwhelm toxic dependency in food production and structural management, we cannot be encumbered by approaches and methods that blur the distinction between organic and conventional and accept standards, practices, or deficiencies that lack clarity and risk undermining organic. This is our challenge, one that must be taken up by environmentalists and consumers alike.

Two weeks before the NOSB meeting, Beyond Pesticides held the 28th National Pesticide Forum, *Greening the Community: Green economy, organic environments, healthy people*, in partnership with Case Western Reserve Medical School, where participants heard the underlying scientific reasons why organic must succeed and expand rapidly. Our current chemical-dependent course, according to the scientists in attendance, contributes to developmental disorders in children and transgenerational epigenetic effects, or changes in gene expression not resulting from DNA changes that are passed on to the next generation. The new and complex scientific findings, on top of well-recognized regulatory deficiencies in looking at chemical mixtures, synergism and the

like, are now outpacing EPA's chemical review protocol so as to make the chemical registration program virtually irrelevant to the protection of health and the environment. We heard directly from a beekeeper who is on the frontlines of the chemical assault on the environment as he experiences the dwindling of his hives.

Our efforts at using risk assessment and the resulting risk mitigation measures should be declared a failed human experiment. Tinkering with additional margins of safety that allow unnecessary toxic materials (without an alternatives and essentiality assessment) on the market is playing with uncertainties that we can no longer afford to play with. Organic is the critical and viable alternative.



Farmers from Baton Rouge, Louisiana pack their truck with organic greens. Photo by Curtis, <http://picasaweb.google.com/cssharif>

### The organic law

Underlying the vibrant public process that is embodied in the NOSB deliberations is a strong federal statute, the *Organic Foods Production Act of 1990* (OFPA), which is set apart from numerous self-certifying environmental and practice-oriented management and labeling programs that are popping up in increasing numbers. It is the OFPA law that defines the vision of organic, the allowable practices and materials, certification and enforcement, and seeks to avoid the use of synthetic materials, making them the exception rather than the rule. In this context, Section 2105 (7 U.S.C. 6504) National Standards for Organic Production states: "To be sold or labeled as an organically produced agricultural product under this title, an agricultural product shall— (1) have been produced and handled without the use of synthetic chemicals, except as otherwise provided in this title; (2) except as otherwise provided in this title and excluding livestock, not be produced on land to which any prohibited substances, including synthetic chemicals, have been applied during the 3 years immediately preceding the harvest of the agricultural products; and (3) be produced and handled in compliance with an organic plan agreed to by the producer and handler of such product and the certifying agent." The law prohibits the "use of any fertilizers containing synthetic ingredients. . ." (7 U.S.C. 6508), focusing on "soil fertility, primarily through the management of the organic content of the soil through proper tillage, crop rotation and manuring." (7 U.S.C. 6513)

In fashioning the National List of allowable and prohibited substances, OFPA states in Section 2118 (7 U.S.C. 6517), "that the use of such substances – (i) would not be harmful to human health or the environment; (ii) is necessary to the production or handling of the agricultural product because of the unavailability of wholly natural substitute products; and (iii) is consistent with organic farming and handling."

### Key issues for public consideration

Input from the public is critical to ensuring that the NOSB fulfills its mission and vision. We are at critical junctures on the following issues (among others): (i) reviewing acceptable and prohibited substances in organic production and processing, (ii) the allowance of "insig-

nificant" levels of synthetic ingredients in allowed materials, (iii) review process for inert ingredients in allowed materials, (iv) nanotechnology in organic practices, (v) allowance of a fertilizer (corn steep liquor) based on whether it is classified as synthetic. [Go to the NOSB webpage on the USDA, Agricultural Marketing Service website. On that page at the bottom is a link to "NOSB Meetings." From there, click on the date of the meeting (April 26-29, 2010) and then find documents of interest (e.g. inerts, nanotechnology) linked throughout the agenda.]

### Moving organic ahead

It is time to elevate the public's voice and participation in organic. The series of articles that follow bridge the issues that directly affect the integrity and growth of organic at a time when the public needs greater understanding of the essential role that organic plays in the transition worldwide away from chemical dependency. To accomplish this, continued oversight of the organic program is crucial with ongoing tracking and enforcement of the law, as is the role of consumers in holding accountable those involved in organic production and the local food movement. Finally, we offer suggestions on starting an organic garden as a way of bringing the principles of environmental stewardship even closer to home.

*Jay Feldman, executive director of Beyond Pesticides, was appointed to a five-year term on the NOSB by Secretary of Agriculture Tom Vilsack beginning in January 2010.*