

poultry animal welfare guidance based in a system approach, should be added to this proposed guidance, to have a more well-rounded and versatile tool box for producers, inspectors and certifiers to use when judging high quality animal welfare on organic farms. Areas where strict numerical assessments are provided should be rejected, and instead be replaced with a vision that farmers can strive to achieve of a healthy farm, with the needs and effects of the interactions of livestock and the environment are taken into account.

GMO AD-HOC COMMITTEE

GMO LETTER

NOC fully supports the letter drafted by the Ad Hoc GMO committee to Secretary Vilsack. It addresses the necessary concern of the organic community on issues of contamination, sets a course for the Board to deal with clarifying issues around excluded methods, and asks the Secretary to acknowledge that the responsibility to prevent GMO contamination of organics should not be borne by organic, but by those who develop, use, and regulate this technology.

Clearly organic farmers shoulder nearly all the burden in the prevention of contamination from GMOs, a technology that they are not interested in, nor permitted to use. It is long past time for the USDA to require that the patent holders and owners and users of the technology take responsibility for contamination beyond their use and control. It is a travesty that such responsibility is solely borne by those in the organic industry.

MATERIALS COMMITTEE

EXTRACTANTS AND SOLVENTS

NOC appreciates that the Materials Committee is seeking both clarity and consistency regarding the use of extractants and solvents. It is absolutely necessary that there be a clear definition of volatile synthetic solvents, and we support the definition in the discussion document.

In addition, whether or not the origin of a material is agricultural or non-agricultural, the prohibition of volatile synthetic solvents should be clear and consistent across all categories (crops, livestock, and handling) and all ingredients, including ingredients of ingredients and regardless of who is using them (certified handlers vs. non-certified handlers?).

Since both the use of and the presence of a volatile synthetic solvent would render a material from any source (agricultural or non-agricultural) a synthetic, all materials using volatile synthetic solvents should require full review by the NOSB.

1. How should “volatile synthetic solvent” be defined, especially in relationship to the rule 205.270(c)2? Should we make a distinction between different types of solvents? If possible,