



CALIFORNIA DEPARTMENT OF
FOOD & AGRICULTURE

Karen Ross, Secretary

May 23, 2014

TO: CALIFORNIA ORGANIC PRODUCTS ADVISORY COMMITTEE (COPAC)
INTERESTED PARTIES

A teleconference meeting of the California Organic Products Advisory Committee has been scheduled. Enclosed is the agenda.

Date: Wednesday, June 4, 2014 Location: 2800 Gateway Oaks Drive
11:00 a.m. – 1:00 p.m. Sacramento, CA 95833
(916) 900-5030

Any member of the public may join the conference call by going to any of the following locations:

Sherman Business Law, 220 Montgomery St., Ste. 1500, San Francisco
Melody Meyer, 4710 Rodeo Gulch Ln., Soquel
Campbell Soup Supply Co., 2300 River Plaza Dr., Ste. 175, Sacramento
Dixon Ridge Farms, 5430 Putah Creek Rd., Winters
Chino Valley Ranchers, 331 W. Citrus St., Colton
Good Earth Natural Foods, 720 Center Blvd., Fairfax
University of California Davis, 1113 Social Sciences and Humanities, Rm. 2150, Davis
Trader Joe's Company, 800 S. Shamrock Ave., Monrovia
University of California Berkeley, 124 Gianni Hall, Berkeley
Earthbound Farm Organic, 1721 San Juan Highway, San Juan Bautista

Notification of committee meetings and their agendas can be found via the Internet at the following website address: <http://www.cdfa.ca.gov/is/meetings.html>

Please find the enclosed agenda. If you have any questions regarding this meeting, please contact me at the number listed below.

Sincerely,

Danny Lee
Supervising Special Investigator

Enclosure

cc: Gary Leslie



**California Department of Food and Agriculture (CDFA)
California Organic Products Advisory Committee (COPAC) Meeting**

**Wednesday, June 4, 2014
11:00 a.m. – 1:00 p.m.**

Teleconference

AGENDA

1. Roll Call/Introductions
2. Material Review Organizations (MROs) – Attachment A
3. New Business
4. Public Comment
5. Next Meeting
6. Adjournment

All meeting facilities are accessible to persons with disabilities. If you need reasonable accommodation as defined by the Americans with Disabilities Act, or if you have questions regarding the public meeting, please contact Susan Shelton at (916) 900-5030. Requests for reasonable accommodation should be made no later than three (3) days before the meeting.

<http://www.cdfa.ca.gov/is/meetings.html>



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Committee members will use the following information to access the conference call:

Dial-in Number: (888) 946-7793

Pass Code: 42965

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The Honorable Secretary Karen Ross
California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

Dear Secretary Karen Ross

The California Organic Products Advisory Committee is charged with advising the secretary on new regulations affecting the organic industry in California. Therefore, we feel it incumbent on ourselves to recognize the work CDFA has done in establishing a model for organic Material Review Organizations (MROs) with the OIM registration program. We would like to recommend that the Secretary support federal action on oversight and accreditation of MROs nationwide.

California's organic industry relies first and foremost on preventative pest management and cycling of crop nutrients for successful and profitable production. However, organic producers and handlers also depend on the availability of compliant inputs to augment soil nutrient deficiencies and to combat pests and diseases. The organic sector expects these inputs to be formulated in compliance with the USDA organic regulations and that evidence of compliance (CDFA OIM registration, certifier approval, etc.) is consistent and available to all organic producers.

The landscape surrounding organic input approval is reminiscent of the organic products industry prior to the USDA National Organic Program (NOP) and federal production standards. A patchwork of varying state standards and requirements confused organic operators and hindered industry growth. California took a significant step forward in the efforts to harmonize organic input review by establishing the nation's only mandatory state organic input registration program. This action is in line with the sentiment of the organic industry as a whole, which wishes to see consistent oversight and accreditation of MROs. The National Organic Standards Board (NOSB) has unanimously passed two recommendations on material review process, one calling for NOP to increase oversight and guidance on material review conducted by certifiers, and the other calling for NOP to develop a mechanism for direct accreditation of MROs. Consumers, producers, certifiers, MROs, and government agencies all agree that harmonization of the material review process and reciprocity between agencies making material review decisions is essential for long-term stability in the organic industry.

We strongly urge CDFA to express support for direct NOP oversight and accreditation of MROs. The benefits to California's organic sector from formalized federal oversight are clear:

- Provide CDFA's OIM program a pathway to NOP recognition and uniform certifier acceptance of material review decisions
- Continue to curtail fraud through registration and federal enforcement authority
- Provide organic producers with consistent and reliable source of available and approved products
- Establish a formal process for resolution of material review disagreements between MROs

- Eliminate duplicative registration process for California based input manufacturers (currently input manufacturers must obtain CDFA registration for sale in California and either OMRI or WSDA registration for sales out-of-state)
- Reduce inspection burden on CDFA's OIM program for out-of-state firms (accreditation and reciprocity would allow CDFA's OIM program to accept other MROs determination and potentially eliminate CDFA's mandate to inspect all out-of-state firms)

Consistency and stability in organic input material review are essential for the continued success of the organic industry in California. Stakeholders from all aspects of the organic industry are calling for federal oversight and accreditation of the material approval process. We feel that CDFA has taken oversight of organic input materials seriously and should support the NOP in doing the same. Please support your stakeholders at COPAC and the entire organic industry of California by urging NOP to take steps in developing an accreditation scope for MROs and bringing the approval of organic input materials under federal enforcement authority.

Sincerely,

COPAC