

July 27, 2007

Bill Foster  
President  
Biopesticide Industry Alliance  
4141 N. Vineland Ave.  
Kerman, CA 93630

Dear Bill,

Thank you for your letter received by OMRI on July 23, 2007. I appreciate the way that you clearly spelled out the issues around the word “restricted” and concerning our designation for plant growth regulators.

It is only recently that I have understood that the use of the word “restricted” carries so much force in the pesticide industry. Having been a farmer for many years I am familiar with the “restricted use” terminology of the EPA but I had not put the picture together until it was brought to my attention by several parties in your organization including Gary Libman, who is also a member of my Board of Directors.

Upon the initiation of these discussions, both with members of BPIA, as noted in your letter, and with OMRI and NOP staff, it has become clear that the issue is primarily one of terminology. The organic industry, certifiers, and OMRI have used the word “restricted” for a long time now but have no need to be attached to it. As noted in your letter other words could be used that convey the status of materials that are neither wholly allowed nor entirely prohibited in organic production without the possible misunderstandings caused by the word ‘restricted.’

Having met today with a significant portion of my Board (embodying the Government Affairs and the Marketing Committees) it is clear that OMRI would like to propose some changes to our terminology. Your letter mentions “limited”, “controlled”, and

“constrained”. Our initial discussions pointed to “conditional”. We have not come to any conclusion but would like to create a proposal for our next Board meeting which is August 15. There are some practical considerations for effective communication in our publications. We would welcome any additional suggestions and would like comments on “restriction”, “provision”, “provisional”, “qualified”, “restrained”, etc. Please provide any suggestions to me at <mailto:dave@omri.org> no later than August 9 so that we can present the information to our Board in a timely fashion.

The issue around Plant Growth Regulators (PGRs) was not clearly identified during our recent revision of the OMRI Generic Materials List. Because EPA considers PGRs to be pesticides we also consider them to be pesticides. The NOP is largely silent on PGRs and does not have any restrictive language about the use of natural PGRs in the regulation the way it does for botanical, biological, and synthetic pesticides. Assuming that the OMRI Board of Directors accepts this interpretation of the NOP rule to the OMRI Generic Materials List we would change the status of non-synthetic PGRs to “Allowed” status in the next edition of the OMRI *Generic Materials List*. If you would like to express other ideas please get back to me at the above noted email address or by phone no later than August 9, 2007.

Thank you for your efforts on this matter. The biopesticide industry is an important stakeholder in the organic industry and we support your efforts to help advance organic agriculture. OMRI has a public comment process for our major revisions to our standards and our Generic Materials List. We invite your input to avoid future misunderstandings and look forward to an on-going mutually beneficial relationship.

Sincerely yours,

David DeCou

Executive Director

CC via email: GL, MB