noncompliance. At that point, it's out of their hands.

You know, another point that I would to Mr. Segell's comments and I'm not sure where he's at on this, but, you know, he admitted that it's a lot easier to put the cows out on pasture than it is the dry cows and you're talking about everything after six months. There's a lot of -- of complexity to a dairy.

CHAIRMAN RIDDLE: That was it.

MR. ENGEL: Okay.

CHAIRMAN RIDDLE: All right. Thanks, Dave.

MR. ENGEL: Thank you.

CHAIRMAN RIDDLE: Joe Mendelson. Then Emily Brown Rosen and then I will call the names of the people from earlier and see if they've arrived.

MR. MENDELSON: No. No, I don't. All set. Good afternoon. My name's Joe Mendelson. I'm with the Center for Food Safety, a nonprofit organization here in Washington, D.C. and with offices also out in San Francisco, California.
Oh, better. That's what you get when you're short. You know, you got to move the microphone.

Again, my name is Joe Mendelson. I'm with the Center for Food Safety. We're a nonprofit organization based here in Washington, D.C.

This is the first time I was able to address the Board at this meeting. I want to thank you again for your hard work and thank the five outgoing members for all their hard work in the program as well.

Just in general, the Center for Food Safety supports the recommendation that you voted out. The draft recommendation you voted out today.

I do want to say a bit on consumer expectation. You know, as an organization that represents mainly consumers, you know, when they purchase an organic product specifically milk, they expect that -- that by purchasing that product they're contributing to the animals ability to enjoy natural behavior. That they are making a significant
contribution to the better welfare treatment of that animal and that means that they would like very clearly a mandatory requirement for access to pasture and to have that clarified to know what they are purchasing. Essentially, what they are supporting.

Without question, I would add that that consumer attitude has been reinforced by the marketing of organic milk. This morning when I got milk, it was -- I believe a Safeway brand organic milk. It was a nice picture of cows and a superimposed photograph of cows out in pasture and I wanted to bring the carton. So, I kept forcing my kids to try and have more cereal to get the milk done, but that didn't quite work. But, you know, you know, you can't have it both ways. If you're marketing an imagine of pasture and you further an expectation of consumer -- of -- of the -- the -- you further an expectation in consumers and you better met that expectation.

I would also just add briefly that there's no question that the -- the word pasture is being
abused. Joe Smille made sort of an offhanded comment, but I have a Washington Post advertisement from the grocery store that advertises a sale for organic shrimp that says pastured in artisan water. So, you know, not only do we need clarity on what it defines, we need enforcement of what it means.

I'm glad to hear, of course, the programs going to an ANPRM that we're going to have a regulation we support as prescriptive a standard in a regulation that's binding not in guidance and I just hope after the ANPRM that we move diligently to a proposed rule and a final rule.

Specifically on the draft, I had a couple of comments. I was looking at the -- the first draft before the Board put it out. Just a couple of things on global warming and climate change were alluded to in that draft. To set the record straight, ammonia is not a -- ammonium is not a greenhouse gas. It's an air pollutant, but it's not a greenhouse gas and sulfite I think was also suggested to be a greenhouse gas. I think it's sulfur dioxide are the greenhouse
gases. But, certainly the diet of any cow affects the
methane emissions and methane is clearly a greenhouse
gas and there's a -- a huge store of literature on the
benefits of carbon dioxide sequestration in pasture of
grasslands and in effect, numerous USDA programs to
promote carbon sequestration through things like
managed pasture.

Okay. Stage of life, I'm not sure what
that means. I turned 40 in February. Some people say
I'm going to be entering a mid-life crisis. That's
certainly a stage of life. I'm not sure if it's more
prescriptive, but certainly, I think what you did is
far as listing in 239(a)(2)1, 2 and 3 is a good step
forward.

As -- as far as 120 days, we support.
Actual numbers I think reference to growing season as
well could be added. We want to see those 120 days
clearly as a minimum and a basement not as the
standard that you'd want.

As far as the dietary feed issue and
number, you know, as a consumer organization, we don't
have the expertise in that. I will say that citing
issues because organic has been told to us be an
environmental standard, citing issues are well within
the realm to consider.

And lastly, on the economic
considerations, I -- I do have to agree on that I felt
the USDA questioned skewed -- was only half a loaf I
should say. I mean there should be consideration to
what was the ultimate economic effect if we do not put
in these strict standards and how will that affect
consumer attitude, hence the market and then farmers.

Thank you.

CHAIRMAN RIDDLE: Thanks, Joe. Emily
Brown Rosen and then like I said I'll -- I'll call as
she's coming up. Is Dr. Juan Velez? Matt Van Baale?
Dennis Stiffler? Okay. None have come.

Emily, you get the last word.

MS. ROSEN: Okay and this is not my word.
I'm reading this for Marty Mesh who sent this in. He
regrets that due to a family emergency he's not able
to be here in person.