

**Comments On  
International Standard for  
Certified R.A.W.™ and Certified C.L.E.A.N.™  
Food Certification**

**Published by**



a 501(c) 3 Not-For-Profit Organization

International Center for Integrative Systems  
701 Concord Avenue  
Cambridge, MA 02138  
URL: [www.cleanfoodcertified.org](http://www.cleanfoodcertified.org)  
EMAIL: [info@cleanfoodcertified.org](mailto:info@cleanfoodcertified.org)



## **R.A.W. & C.L.E.A.N Food Certification**

The International Center for Integrative Systems (ICIS) (See below and [www.integrativesystems.org](http://www.integrativesystems.org)) has developed a standard that aims to verify the claims and support the growth of the community of raw and healthy food while enabling transparency for consumers, retailers, manufacturers and the regulatory community. The standard may be used for conformity assessment, purchaser specifications, and public education. ICIS offers certification of products, services, and companies in conformance with its standards.

### **International Center for Integrative Systems (ICIS)**

The International Center for Integrative Systems aims to be the world's leading center pioneering scientific research for developing new methodologies for integrating, understanding, and visualizing large scale complex systems such as media & telecommunication infrastructure, healthcare, transportation systems and innovation & governance systems.

The Center's activities include:

- Scientific Research
- Lectures and Open Forums
- Education Initiatives with Universities
- Curriculum Development
- Systems Visualization
- Publishing

For additional information on ICIS or any of its programs, contact:

The International Center for Integrative Systems  
701 Concord Avenue  
Cambridge, MA 02138  
phone: (617)-500-1970  
email: [info@cleanfoodcertified.org](mailto:info@cleanfoodcertified.org)  
url: [www.cleanfoodcertified.org](http://www.cleanfoodcertified.org)

## **Standards Committee**

### **Committee Chairperson**

Dr. V.A. Shiva Ayyadurai

### **Committee Members**

Sarah Chapin  
Sequoia Cheney  
Robert Freeland  
Blessing Horowitz  
Scott Jensen  
Joshua Mchugh  
Susan Obrien

## **Technical Committee**

### **Committee Chairperson**

Dr. V.A. Shiva Ayyadurai

### **Committee Members**

Alison Brushaber  
John Burns  
Prabhakar Deonikar  
Tristan Kampman  
Santhiya Kothandaram  
Shari Leidich

**Stakeholders including the following were involved in providing feedback, participating in public hearings creation of this standard:**

- Food Processors and Manufacturers
- Food Industry Trade Associations
- Farmers/Food Producers and Growers
- Public Interest and Consumer Advocacy Groups
- Food Distributors and Retailers
- Restaurants
- Federal, State and Regional Government Agencies
- Standards Setting Organizations
- Certifying and Accrediting Organizations
- GMP, HACCP, FDA FSIS and USDA NOP Auditors & Inspectors
- Academicians
- Nutritionists, Health Care Workers and Physicians
- Consumers

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## **I. Public Hearing 1**

Online Public Hearing held online on February 2, 2015 from 2 PM to 3 PM  
(EST)

Presentation Link: [www.join.me/vashivalive](http://www.join.me/vashivalive)

Conference Call Phone No.: 1-712-432-1630

Meeting Code: RAW-FOOD (729-3663) #

### **Agenda**

1. Introduction – Dr. Shiva Ayyadurai, Ph.D.
2. Presentation - Dr. Shiva Ayyadurai, Ph.D.
3. Discussion and Questions – Attendees (See meeting notes)

### **Meeting Notes**

1. The meeting began at 2.05 PM.
2. Dr. V.A. Shiva Ayyadurai welcomed the attendees, thanked them for coming together as a community.
3. Dr. V.A. Shiva Ayyadurai presented the draft of the Raw Food Standard.
4. Dr. V.A. Shiva Ayyadurai used a PowerPoint presentation to review the effort over the past year, the various meetings, the various workshops held, to derive the current standard.
5. Dr. Ayyadurai's presentation ended at 2.25 PM.
6. Scott Jensen, Rhythm Superfoods: What is the basis of the temperature-time guidelines in section 6.2 of this document?

Resolution: These guidelines are based on a general literature review of current food processing practices. These guidelines will improve with time as new and accurate data comes from the CytoSolve® Tested analysis of ingredients from the manufacturers

7. Sequoia Cheney, Wonderfully Raw: Some of the ingredients that go into the raw food products are not 100% organic. How can this be resolved in the current standard?

Resolution: Dr. Ayyadurai suggested that the standard can be modified to include the USDA definition of ‘Made with organic ingredients’, which calls for >70% of the ingredients to be organic, to resolve the issue.

8. Robert Freeland, Go Raw: How the time taken for the certification can be optimized so that it does not prolong the product life cycle.

Resolution: Dr. Ayyadurai clarified that the time consuming part for the certification process are ‘Safety’ (section 4) and ‘Minimally Processed’ (section 5) criteria. Items 4.1 through 4.4 and 5.1 can be done by/obtained from a provider of organic certification while simultaneously performing the ‘Bioavailable’ (section 6) criteria, which will bring in process efficiency and reduction in time for Certification process.

9. A discussion arose on the imprimatur for the certification. There was a consensus that the imprimatur could be a symbol so that it doesn’t occupy too much space on the packaging. Also, a black and white as well as a condensed (abbreviated) version of the imprimatur needs to be created.

### **Attendee List**

Attendee ID	Name	Organization	Email
1	Blessing Horowitz	Alive and Radiant	blessingalive@gmail.com
2	Tristan Kampman	Alive and Radiant	tristan@livingbrandscompany.com
4	Sequoia Cheney	Wonderfully Raw	sequoia@mycocoroons.com
5	Robert Freeland	Go Raw	rob@goraw.com
6	Scott Jensen	Rhythm Superfoods	sjensen@rhythmsuperfoods.com
7	Susan O’Brien	Hail Merry	suobrien@hailmerry.com

9	Joshua McHugh	Living Intentions	Joshua@livingintentions.com
10	Alison Brushaber	Hail Merry	abrushaber@hailmerry.com



## II. Public Hearing 2

A Public Hearing held at Expo West on March 7, 2015 from 8.30 AM to 10.00 AM (PST) in Room 209 A, Anaheim Convention Center, Anaheim, CA

### Agenda

1. Introduction – David Lafferty, Whole Foods Inc.
2. Presentation - Dr. Shiva Ayyadurai, Ph.D.
3. Discussion and Questions – Attendees (See meeting notes)

### Key Findings

1. Clear and unanimous consensus on the definition of “Raw Food” being bounded by the three elements of safety, minimally processed, and bioavailability of enzymes, as defined in the Standard
2. A recognition that the “Raw Food” standard is actually a superset of defining food that is “truly healthy,” “consciously made,” “a gold standard.”
3. A clear consensus that this standard can be used to label foods and products that are not just “raw” but comply to a rubric of products that are “truly healthy,” “consciously made,” “a gold standard.”
4. Relative #3, there was also a consensus that we should perhaps label the standard as “Raw Food” but **something else**.
5. Relative #4, the community agreed that a homework assignment for all the attendees to come back with what to name that “something else”
6. Relative #5, there was also a consensus that whatever we name that “something else”, raw would become a subset of that “something else.” By way of example, if a symbol of a GOLD STAR is the label for that “something else, ” then the GOLD STAR adjacent to the term “RAW” would be the label for “Raw Foods” that were processed with significantly less heat while compliant to higher safety standards.
7. The following were outstanding items to be addressed in the final Standard:
  - a. For food that is processed at lower temperatures, the enhanced safety guidelines need to be enumerated.
  - b. What should be the cut-off for the bioavailability criteria; currently it is 50%.
  - c. What should be the name of imprimatur?

### Meeting Notes

1. The meeting began at 8.40 AM.
2. Mr. David Lafferty from Whole Foods welcomed the attendees, thanked them for coming together as a community and introduced Dr. Ayyadurai.
3. Dr. V.A. Shiva Ayyadurai from RawFoodCertified.Org presented the draft of the Raw Food Standard.
4. Dr. V.A. Shiva Ayyadurai used a PowerPoint presentation to review the effort over the past year, the various meetings, the various workshops held, to derive the current [Standard](http://www.rawfoodcertified.org/get-certified.asp) (<http://www.rawfoodcertified.org/get-certified.asp>).
5. Dr. Ayyadurai's presentation ended at 9.00 AM.
6. Questions and answers continued until 10.05 AM.
7. Steven Brown, Brad's Raw, asked about how the processing temperature range affects the enzymatic score.

Resolution: Dr. Ayyadurai clarified that in addition to the temperature, the duration of heating also has significant impact on the enzymatic score. Manufacturer seeking certification would have to provide not only the processing temperature but also processing steps and temporal duration.

8. Ease Oldham, Easy Living Foods, asked about the enzyme activity difference in soaked and un-soaked almonds and how flash pasteurization of almonds affects the enzyme activity in almonds.

Resolution: Dr. Ayyadurai said the bioavailability criteria determination takes into account the processing steps such as soaking to calculate enzyme activity. It was clarified that even after flash pasteurization, there is a significant amount of enzymes that are still bioavailable inside the almonds. In summary, we recognize that the enzymatic activity calculations have a degree of uncertainty; however, the CytoSolve® enzymatic analysis method would take into account variations in

processing and incorporate the known science from the literature available to CytoSolve.

9. Arthur Pergament, Brad's Raw Food, shared with us some of his experience in doing single ingredient enzymatic testing and asked how the method used in the Standard was different.

Resolution: Dr. Ayyadurai explained the bioavailability of enzyme analysis, given a products' complexity of multiple ingredients would be cost prohibitive because of the cost of reagents for the testing of 100s of enzymes. CytoSolve's in silico modeling provides a framework for capturing an understanding of this complexity in meaningful and cost effective way based on mining and integrating the scientific literature.

10. Susan O'Brien, Hail Merry, pointed out that in the bioavailability calculation, the macronutrients such as essential fats are not considered in the Standard.

Resolution: Dr. Ayyadurai thanked Ms. O'Brien for pointing out the omission and the draft will be revised to ensure essential fatty acids are part of bioavailability criteria.

11. A general discussion among multiple attendees arose on the inclusion of temperature in defining raw food. It was agreed that minimal processing and safety are key criteria. Tristan Kampman, Alive and Radiant, suggested that the Standard provides us an opportunity to capture the real essence of "Raw Food."

12. Dr. Ayyadurai pointed out that in ancient and traditional systems of healing, including in indigenous cultures, food preparation was governed by the notions of safety, minimally processed and bioavailability of enzymes. He gave the example of the south Indian dish of "Idlee."

13. Blessing Horowitz, Alive and Radiant, also acknowledged that the Standard was capturing a true definition of what is healthy food that is based on **bioavailability enzymatic activity**/ that captures the notion of what is truly a "consciously" made food and not based on just temperature alone, and this would be beneficial for all the stakeholders.

14. Artemis Keszainn, New Earth Center, further emphasized such definition and suggested that the name for such certification would be key in broader acceptance of the standard. It could have subcategories that may relate to Raw Food, Vegan, Paleo, etc.
15. Ease Oldham, Easy Living Foods, added that under the new certification, the raw component can be associated with lower temperature since the majority of consumers associate Raw with lower processing temperature.
16. Sarah Palisi Chapin, Hail Merry, emphasized the importance of safety and bioavailability in defining the new standard.
17. David, Whole Foods, agreed to the importance of the Raw Food standard as it bridges the gap between self-proclaiming entities and the companies that comply with the Standard.
18. A discussion arose on the types of certifications such as top-down certification (mandated by a government agency, such as FDA) or bottoms-up certification (arrived at by consensus from the stakeholder community, such as the Raw Food Certification).
19. Alison Brushaber, Hail Merry, emphasized the safety element for the Raw Food Certification and shared their experience with FDA on safety standards.
20. Robert Freeland, Go Raw, asked whether there is a conflict of interest because of the use of CytoSolve as the technology for accessing the bioavailability.

Resolution: Dr. Ayyadurai clarified that the Standard is a project of International Center for Integrative Systems, a 501 (c) (3) non-profit organization. No one at CytoSolve has been paid for developing the Standard. If and when the community agree on the Standard, only then will CytoSolve will receive any fee for using its technology for conducting bioavailability of enzymes.

21. A discussion took place on the safety of dried foods. Justin Feldman, Just Pure Foods, asked what the safety procedures involved in the Raw Food Certification are and whether the kill-step process is included in the safety certification.
22. Scott Jensen, Rhythm Superfoods, emphasized that the safety component of the Raw Food Certification is geared towards pathogen removal and providing a healthy and safe product for consumption.
23. Mazen Rabah, Go Raw, asked if the certification will be graded, e.g. 50%, 70% or 90% raw and if it is, will it cause confusion. Dr. Ayyadurai clarified that, being a bottoms-up standard, the stakeholder community can come up with a method which will not create confusion before the Standard draft is finalized.
24. A consensus emerged from the present stakeholders about the need to expand the Raw Food Certification that captures the notion of what is truly a "consciously" made food. Artemis Keszainn, New Earth Center, suggested conducting a survey to come up with a name for such Standard.
25. The meeting concluded with the summary of the following:
  - a. Clear and unanimous consensus on the definition of "Raw Food" being bounded by the three elements of safety, minimally processed, and bioavailability of enzymes, as defined in the Standard
  - b. A recognition that the "Raw Food" standard is actually a superset of defining food that is "truly healthy," "consciously made," "a gold standard."
  - c. A clear consensus that this standard can be used to label foods and products that are not just "raw" but comply to a rubric of products that are "truly healthy," "consciously made," "a gold standard."
  - d. Relative #3, there was also a consensus that we should perhaps label the standard as "Raw Food" but **something else**.
  - e. Relative #4, the community agreed that a homework assignment for all the attendees to come back with what to name that "something else"
  - f. Relative #5, there was also a consensus that whatever we name that "something else", raw would become a subset of that "something else." By way of example, if a symbol of a GOLD STAR is the label for that "something else, " then the GOLD STAR adjacent to the term "RAW" would be the label for "Raw Foods" that were processed with significantly less heat while compliant to higher safely standards.

- g. The following were outstanding items to be addressed in the final Standard:
  - i. For food that is processed at lower temperatures, the enhanced safety guidelines need to be enumerated.
  - ii. What should be the cut-off for the bioavailability criteria; currently it is 50%.
  - iii. What should be the name of imprimatur?

## Attendee List

Attendee ID	Name	Organization	Email
1	Blessing Horowytz	Alive and Radiant	blessingalive@gmail.com
2	Tristan Kampman	Alive and Radiant	tristan@livingbrandscompany.com
3	Brad Gruno	Brad's Raw	bradgruno@gmail.com
4	Sequoia Cheney	Wonderfully Raw	sequoia@mycocoroons.com
5	Robert Freeland	Go Raw	rob@goraw.com
6	Scott Jensen	Rhythm Superfoods	sjensen@rhythmsuperfoods.com
7	Susan O'Brien	Hail Merry	suobrien@hailmerry.com
8	Sarah Palisi Chapin	Hail Merry	spalisichapin@hailmerry.com
9	Joshua McHugh	Living Intentions	Joshua@livingintentions.com
10	Alison Brushaber	Hail Merry	abrushaber@hailmerry.com
11	Steven Brown	Brad's Raw	steve@pergs.com
12	Ease Oldham	Easy Living Foods	ease@easylivingfoods.com
13	Justin Feldman	Just Pure Foods	justin@justpurefoods.com
14	Arthur Pergament	Brad's Raw	ajp@pergamentadvisors.com
15	Arttemis Keszainn	New Earth Center	arttemis@newearthcenter.com
16	David Friedman	Raw Indulgence	dave@rawrev.com
17	Mazen Rabah	Go Raw	maz@goraw.com
18	Emma Smith	Zimt	emma@zimt.ca
19	Josh Griffing	Raw Food Central	josh@rawfoodcentral.com
20	Ginger Dunham	Living Raw	ginger@livingrawtreats.com
21	Tricia Caldwell	Real and Worthful	tricia@realandworthful.com
22	Chris Herbert	Bearded Brothers	chris@beardedbros.com
23	Samantha Abrams	Emmy's Organics	samantha@emmysorganics.com
24	Sher Kopman	Raw Foodz	info@rawfoodz.com
25	Mark Kopman	Raw Foodz	info@rawfoodz.com
26	Chelsea Marshal	Laughing Giraffe	chelsea@laughinggiraffe.com
27	Herb Heller	Earth Circle	herb@earthcircleorganics.com

		Organics	
28	Cindy Liggett	Brads Raw	cindy@bradsrawfoods.com
29	Naomi Mariano	Ahimsa Cuisine	naomi@ahimsacuisine.com
30	Michael Pelton	Raw Food Central	mike@rawfoodcentral.com
31	Ian Gaffney	Emmy's Organics	ian@emmysorganics.com
32	Jaime Calahan	Steve's Paleo Foods	jamie@stevespaleogoods.com
33	Shari Leidich	Two Moms In The Raw	shari@twomomsintheraw.com
34	Kate Diamond	GoMacro	kate@gomacro.com
35	Amelia Kirchoff	GoMacro	amelia@gomacro.com
36	Meg Heitlinger	Two Moms In The Raw	meg@twomomsintheraw.com
37	Ben McLean	Uncle Matt's Organic	ben@unclematts.com
38	Alex Howell	Uncle Matt's Organic	alex@unclematts.com
39	David Lafferty	Whole Foods	david.lafferty@wholefoods.com
40	J. D. Collins	Laughing Giraffe	jd@laughinggiraffe.com



### **III. Follow-up Online Discussion to Expo West 2015 Public Hearing**

#### **A Follow-up Online Discussion to Public Hearing held at Expo West 2015 Date: March 24, 2015 from 3 PM to 4.20 PM (EDT)**

Presentation Link: [www.join.me/vashivalive](http://www.join.me/vashivalive)

Conference Call Phone No.: 1-712-432-1630

Meeting Code: RAW-FOOD (729-3663) #

#### **Agenda**

1. Introduction and roll call – Dr. Shiva Ayyadurai, Ph.D.
2. Presentation - Dr. Shiva Ayyadurai, Ph.D.
3. Discussion and Questions – Attendees (See meeting notes)

#### **Meeting Notes**

1. The meeting was called to order at 3.05 PM.
2. Dr. Ayyadurai welcomed the attendees and took the roll call.
3. Dr. Ayyadurai reviewed the PowerPoint presentation that summarized the feedback received during Expo West 2015. The feedback from the public hearing reflected an overwhelming consensus to support the draft Standard. The only outstanding item was what should we call the Standard, given the Standard was defining not just what is “Raw” but defining what is wholesome food. The group agreed that by the next meeting they would have submitted their thoughts on what should be the name for the Standard.
4. During the presentation Dr. Ayyadurai shared the possible names for the Standard and the motivations behind them received from the participants which included the following: RealFood, TruFood, STAR, STAR-RAW, R.A.W., PURE Food,

SuperFoods, Prime Food, Real Raw Food, Really R.A.W. Food, Beyond RAW, and Complete Food.

5. Dr. Ayyadurai proposed the name “R.A.W.” for the Standard which stands for Real, Alive and Whole and explained that Real would encompass safety, non-GMO and Organic criteria; Alive would encompass the enzymatic bioactivity criteria; and Whole would encompass the minimal processing and nutrient density criteria.
6. Dr. V.A. Shiva Ayyadurai from RawFoodCertified.Org introduced the topic of discussion as coming up with the name for the Standard based on the feedback from the Expo West 2015 public hearing.
7. Dr. Ayyadurai introduced R.A.W. as the new name for the Standard and explained the expanded criteria for the certification.
8. Dr. Ayyadurai completed reviewing the feedback from the previous meeting at 3.20 PM and opened the floor for discussion and questions.
9. Ease Oldham, Easy Living Foods, asked if a separate Standard can be formulated to just include raw (bioavailable) criteria without Organic and non-GMO criteria.  
  
Response: Dr. Ayyadurai explained that excluding the Organic and non-GMO criteria from the Standard definition goes against the spirit of the Standard. Dr. Ayyadurai agreed to keep the matter in discussion for future revisions but reiterated that the current definition will stand.
10. Dr. Ayyadurai polled the attendees to see how many of them supported exclusion of Organic and non-GMO criteria from the Standard’s definition.
11. Ian Gaffney, Emmy’s Organics agreed with Dr. Ayyadurai’s response to Ease Oldham and commented that having Organic and non-GMO criteria complements the definition of the Standard and the products it certifies are distinguished as premium products.

12. Steven McDermott, Really Good, agreed that Organic and non-GMO criteria need to be the part of the Standard. He said he loved the name “R.A.W.” however, he suggested that consumer may not understand it clearly from other products which are raw and the consumer may need to be educated about the Standard criteria.

Response: Dr. Ayyadurai replied that the certification, at this stage, will only be applied to packaged goods and not raw products, and agreed to an element of customer education in moving the Standard forward.

13. Ease Oldham, Easy Living Foods, asked how the enzymatic activity score is determined.

Response: Dr. Ayyadurai explained that the score is calculated based on information obtained from the peer reviewed scientific literature for the enzymes in the product and based on the processing steps during the manufacturing process.

14. Sarah Chapin, Hail Merry, asked how the criteria of Safe, Organic and Non-GMO will be assessed.

Response: Dr. Ayyadurai explained that Safe and Organic criteria are mandatory. Products that do not fit these criteria will not be considered for the certification. The Organic criteria will be a graded criteria, meaning, a score between 0 to 50 will be assigned based on how many ingredients in a product are 100% Organic, USDA Organic or non-Organic.

15. Dr. Ayyadurai solicited approval or disapproval for the possible names for the Standard. The names “Pure Food”, “Real Food,” “Star,” “Star Raw,” “Superfoods,” were disapproved whereas “R.A.W.,” “R.A.W. Premium” were approved.

16. Dr. Ayyadurai asked for suggestions for new names that were not discussed so far.

17. Ian Gaffney, Emmy’s Organics suggested “Real Raw Food” and “Certified R.A.W.”
18. Dr. Shiva took a poll for approval of “Certified R.A.W.”
19. There was a consensus for “Certified R.A.W.”
20. Ease Oldham, Easy Living Foods, suggested that instead of just one Standard, we could have two. One to represent products that fulfill the criteria of the current Standard and other to represent products that are conventionally raw.
21. Ease Oldham, Easy Living Foods, enquired about the “kill step” for minimally processed food.  
  
Response: Dr. Ayyadurai replied that the technical committee is currently discussing the matter.
22. Dr. Ayyadurai concluded the meeting by emphasizing that “Certified R.A.W.” was agreeable to majority of the attendees.
23. Towards the next steps, Dr. Ayyadurai shared that the steering committee will convene to make the final decision on the naming of the Standard in the week of March, 30 – April, 3, 2015.

### Attendee List

Attendee ID	Name	Organization	Email
1	Ease Oldham	Easy Living Foods	ease@easylivingfoods.com
2	Emma Smith	Zimt Artisan Chocolates Ltd.	emma@zimt.ca
4	Tricia Caldwell	Real And Worthful	tricia@realandworthful.com
5	Ian Gaffney	Emmy’s Organics	ian@emmysorganics.com
6	Sarah Palisi Chapin	Hail Merry	spalisichapin@hailmerry.com
7	Susan O’Brien	Hail Merry	suobrien@hailmerry.com
9	Julia Kirouac	Nud Fud	julia@nudfud.com
10	Steven	Really Good	

	McDermott		
11	Christine McDermott	Really Good	
12	Katie Cook	Earth Circle One	eric@earthcircleorganics.com
13	Alice Benedetto	Raw Revolution	alice@rawrev.com
14	Aaron Ash	Gorilla Food	gorillafood@gmail.com
15	Sacha Roth- Masson	Hemp Oil Canada Inc.	acha@hempoilcan.com

## **IV. Raw Food Certification Steering Committee Meeting 1**

Date: April 1, 2015 from 1 PM to 2.20 PM (EDT)

Presentation Link: [www.join.me/vashivalive](http://www.join.me/vashivalive)

Conference Call Phone No.: 1-712-432-1630

Meeting Code: 70777 #

### **Agenda**

1. Introduction and roll call.
2. Presentation of results from March 24 naming meeting.
3. Discussion and Questions – Attendees (See meeting notes).

### **Meeting Notes**

1. The meeting was called to order at 1.03 PM.
2. John Burns, Whole Foods, discussed the importance of the inclusion of microbial testing in the HACCP certification. John Burns was asked to provide amendments to that effect.
3. John Burns recommended that before finalizing the imprimatur and name the steering committee came up with for the Standard should be run by the regulatory agencies such as United States Department of Agriculture (USDA). Dr. Ayyadurai shared that the Standard's organization ICIS will be registered with American National Standards Institute (ANSI). John Burns appreciated the effort and agreed that the process of finalizing the Standard is going in the right direction.
4. PowerPoint presentation was reviewed from the previous online meeting held on March 24, 2015, that summarized the feedback received during Expo West 2015. The feedback from the public hearing reflected an overwhelming consensus to

- support the draft Standard. The only outstanding item was what we should call the Standard.
5. The steering committee is now responsible for finalizing the name. The purpose of today's meeting was to have all members of the steering committee present to make this final decision. There were only four (4) out of nine (9) members of the steering committee present at the meeting. The Chairman, who severely ill, was disappointed that all committee members were not present.
  6. The results from the previous naming meeting were shared. There was a consensus for "Certified R.A.W."; however, it is the decision for the Steering Committee to finalize the name. The Chairman summarized and elaborated the previous week's discussion. The nearly 20 participants of the discussion recognized that the naming is difficult given that a "raw" category exists and the Standard in many ways more global than "raw." This difficulty, it appears, can be solved by re-defining/re-educating the notion of "raw" as "R.A.W."
  7. The acronym "R.A.W." emerged from the feedback following the public hearing at Expo West for the Standard which stands for Real, Alive and Whole and explained that Real would encompass safety, non-GMO and Organic criteria; Alive would encompass the enzymatic bioactivity criteria; and Whole would encompass the minimal processing and nutrient density criteria. This re-branding of "raw" would allow us to keep "raw" and expanding it to what it really means about wholesome food.
  8. Dr. Ayyadurai shared Standard names with imprimaturs that were combinations of words "Certified," "R.A.W. FOOD," "PUREFOOD," "WHOLEFOOD," "Real – Alive – Whole," and, "Real – Alive – Pure."
  9. Dr. Ayyadurai completed reviewing the presentation at 1.20 PM and opened the floor for discussion and questions.
  10. Blessing Horowitz, Alive and Radiant, shared that she had been in discussion with a marketing firm executive about the naming the Standard and the executive

indicated that she had reservation about using “raw” in any form in the name based on her market research. Blessing conveyed that even though she likes ingenuity behind the acronym “R.A.W.”, the consumer may not fully appreciate the spirit of the standard and wanted to keep the discussion ongoing about the naming of the standards.

11. Scott Jensen, Rhythm Superfoods, who also was on call with the marketing executive, shared Blessing’s concerns about the inclusion of “raw” in the name of the standard. He reiterated the need to ask “does the word “raw” resonate with the consumer? And if it does, is it in a positive or a negative manner?” He added that the name should be acceptable to the manufacturer of “raw” foods as well as the consumer and expressed caution in using “raw” in the name of the Standard.
12. The Chairman reiterated that we are following a public process and not the opinion of a consultant and it was the duty of the steering committee to ensure their attendance at all meetings to finalize this process. The focus now should be selecting a name from the list that has been put together after Expo West so as to get the Standard unveiled in a timely manner by April 10, 2015.
13. Scott Jensen asked what are the alternatives to the word “raw” that can be more acceptable to consumers. He conveyed that “Certified” should be a part of the name as it alludes to a rigorous process of testing the product.
14. John Burns conveyed his reluctance for any name that includes “WHOLEFOOD” and suggested to circulate top 3 names and take a survey among the steering committee.
15. Blessing agreed to make sure personally that all members of the steering committee would attend meeting on Friday April 3, 2015 from 3 – 5 PM (EDT) to finalize a list of names. After the finalization of the list, it was agreed that we would then circulate the list of top 3 names by the steering committee to all members of the steering committee who would need to vote on each name assigning a number 1, 2 or 3; 1 being the most liked, 2 being moderately liked and



3 being not liked. The email for voting will be sent out on Saturday and the committee members need to send their votes by April 7, 2015, 8 PM (EDT).

### **Attendee List**

Attendee ID	Name	Organization	Email
1	Blessing Horowitz	Alive and Radiant	blessingalive@gmail.com
5	Robert Freeland	Go Raw	rob@goraw.com
6	Scott Jensen	Rhythm Superfoods	sjensen@rhythmsuperfoods.com
41	John Burns	Whole Foods	john.burns@wholefoods.com

## **V. Raw Food Certification Steering Committee Meeting 2**

Date: April 3, 2015 from 3 PM to 4.20 PM (EDT)

Presentation Link: [www.join.me/vashivalive](http://www.join.me/vashivalive)

Conference Call Phone No.: 1-712-432-1630

Meeting Code: 70777 #

### **Agenda**

1. Introduction and roll call.
2. Discussion of names for the Standard.
3. Discussion and Questions – Attendees (See meeting notes).

### **Meeting Notes**

1. The meeting was called to order at 3.03 PM.
2. Blessing Horowitz, Alive and Radiant, gave a brief synopsis of the status of the Standard.
3. The chairman of the committee welcomed the attendees and took the roll call.
4. The chairman reasserted the reception of the Standard by raw food community evidenced by a strong attendance during previous meetings since the public hearing at Expo West 2015.
5. A PowerPoint presentation was reviewed to go over list of names suggested during previous meetings that included: RealFood, TruFood, STAR, STAR-RAW, R.A.W., URE Food, SuperFoods, Prime Food, Real Raw Food, Beyond RAW, Complete Food, and CERTIFIED R.A.W.
6. In the next part of the presentation, the name association exercise conducted by the chair for the products from the raw food steering committee member's

- portfolio and their closest competitors was shared to understand the branding distinction.
7. A list of names that were key differentiators between raw products and close competitors emerged from the analysis was shared. The list included following names for the raw food products: LIVE/RAW, VEGAN, GLUTEN FREE, SUPERFOOD, SPROUTED, and NUTRIENT DENSE; and for closest competing products: No Trans-Fat, Organic, All Natural, Nutritious, Kosher, and Healthy.
  8. The chairman pointed out that the names associated with the brands raw food products are a reminder of promise made to the consumer and also serve educational purpose.
  9. The floor was opened for name suggestions from the attendees.
  10. Joshua McHugh, Living Intentions, shared a list of the names with the attendees. The list included a set of combination of words including RAW, plant-based, superfoods, nutrients, nutrition, R.A.W., and pure. Joshua shared the thought process behind these names and strongly favored the inclusion of the word “RAW” (despite the negative connotations) and plant-based; and was not in favor of using the acronym R.A.W. as it could require additional educational effort to understand it. Alison Brushaber, Hail Merry, Blessing Horowitz, and Susan Chapin, Hail Merry favored the use of “plant-based” in the name for the Standard since it can distinguish the certified product from other animal products.
  11. Robert Freeland, Go Raw, suggested that the names discussed so far are for the category and not necessarily for the Standard. He indicated that the name of the standard should be limited to only 2-3 words. He voiced objection for using “plant-based” as it is more indicative of a category than a Standard; however, indicated that the Standard name should convey bioavailability of enzymes in the product.
  12. The chairman shared that “plant-based” has a more instant recognition given the fact that almost 5% of the US population classify their diet to be “plant-based”

- and agreed that this phrase distinguishes the certified products from “Paleo” category.
13. Sarah Palisi, suggested that the name should convey minimal processing and bioavailability of enzymes and Alison Brushaber agreed with it.
  14. Robert Freeland agreed the name of the Standard should include “RAW” and “bioavailable”.
  15. Scott Jensen, Rhythm Superfoods, indicated his preference for the acronym “R.A.W.” along with “plant-based” and “bioavailable” for inclusion in the name of the Standard, but expressed concern that consumer may need to be educated about the “bioavailable” part of the Standard.
  16. Rob Freeland favored the use of acronym “R.A.W.” but recommended analytics to be conducted on consumer acceptance, ease of understanding, and additional consumer educational effort before finalization of the name to include “R.A.W.”
  17. The chairman alleviated the concerns by emphasizing the steady growth in the raw food category in the health food sector over the past 15 years and reminded the attendees that the pioneering work done the people on the call to promote the raw food category is an evidence of acceptance of the word “RAW” by the consumers. The chairman recommended that once the standard is unveiled, there should be a cohesive and substantial roll-out plan to support and publicize the standard, educate the consumers and other stakeholders such as retail businesses, scientific community, etc.
  18. There was a consensus on having a roll out communication plan for the Standard once it is published.
  19. Final choices sought for the name and ideas for the Standard from the attendees.  
The response is as follows:

- Scott Jensen: R.A.W. and also indicative ‘plant-based’ and “bioavailable”
- Sarah Palisi: Indicative of “minimally processed” and “bioavailable”; choose symbol to suggest “plant-based”
- Blessing Horowitz: Indicative of “plant-based”
- Robert Freeland: Certified R.A.W.
- Alison Brushaber: Include “Certified”

20. As a part of communication roll-out for the Standard, the chairman suggested the Standard could be published in a monograph format in a Food Science journal. Alison Brushaber agreed to help getting the monograph together for publication. Blessing Horowitz shared that she has an opportunity to write an article featuring the Standard in Whole Foods Magazine. Sarah also shared that workshop could be organized in conferences and Expos to promote the Standard.

21. The chairman conveyed that there was a consensus on “Certified R.A.W.” and delineated next steps as follows.

- a. The final standard which will be published on April 10, 2015 will include final comments on HACCP from John Burns as well as the Real, Alive and Whole treatment, which will connect with the certification.
- b. The information pyramid for communication will include:
  - i. The logo
  - ii. A 1-pager which Shiva will develop
  - iii. The Standards document

The R.A.W. acronym will be aligned end-to-end in this process.

- c. Starting April 10, 2015 ICIS will sign up the core steering committee members' organizations to be the first customers of the imprimatur, then ICIS will work with Blessings to bring others into the fold. By Expo East, ICIS's goal is to have 20-30 certified manufacturers.
- d. A marketing communications plan will be drafted to do the short-term and long-term education of R.A.W. and Certified R.A.W.
- e. Robert and Shiva will huddle to map out synergistic relationship between the Certification organization and the to-be-created Trade Association.
- f. The steering committee will do one last meeting to review the logo either as a team or individually.

### Attendee List

Attendee ID	Name	Organization	Email
1	Blessing Horowytz	Alive and Radiant	blessingalive@gmail.com
5	Robert Freeland	Go Raw	rob@goraw.com
6	Scott Jensen	Rhythm Superfoods	sjensen@rhythmsuperfoods.com
8	Sarah Palisi Chapin	Hail Merry	spalisichapin@hailmerry.com
9	Joshua McHugh	Living Intentions	Joshua@livingintentions.com
10	Alison Brushhaber	Hail Merry	abrushaber@hailmerry.com

## **VI. Raw Food Certification Manufacturers Meetings**

Date: May 1, 2015 - June 25, 2015

As a follow up to the naming of Certified R.A.W. a series of meetings were held to also support the naming of Certified C.L.E.A.N.

### **Agenda**

1. Review of R.A.W. naming
2. Discussion of R.A.W. & C.L.E.A.N.
3. Consensus

### **Meeting Notes**

1. Given that there still seemed to be two opinions of the naming of the certification as “Certified R.A.W.,” to be judicious another series of meetings took place in sampling the following key raw manufacturers:
  - a. BRAD’s Raw
  - b. Wonderfully Raw.
  - c. Hail Merry
  - d. Living Intentions
  - e. Rhythm Superfoods
  - f. Raw Foodz
  - g. Go Macro
  - h. Emmy’s Organics
  - i. Zimt
2. What emerged from these meetings was that raw is a category and those who know raw will appreciate the RAW certification; however, there are many more ordinary consumers who have no idea of what RAW is, but do know intuitively that they want to eat “clean” foods.
3. To this end, the acronym C.L.E.A.N. was also agreed by consensus to be an additional imprimatur: C = Conscious, L= Live, E=Ethical, A= Active and N= Nourishing.

4. The understanding is that for the average consumer, the notion of Certified C.L.E.A.N. will enable the raw manufacturers to distinguish their products to a broader audience.
5. It was agreed that once a product from a manufacturer is certified for either Certified R.A.W. or Certified C.L.E.A.N., they may either of the imprimaturs with the product as both will have to satisfy the same core criteria of safety, minimally processed and bioavailability, though sorted in different ways, but yielding the same score.
6. Each meeting was conducted in a similar manner and all listed herein agreed to the additional imprimatur naming of Certified C.L.E.A.N.



## **VII. Review of Supporting Certification Requirements Meeting**

Date: Sep 9, 2015 - Sep 30, 2015

A set of meetings were held to review the existing Standard for its requirement of other supporting certifications and certain changes made to the Standard to accommodate food manufacturers' genuine needs.

### **Agenda**

1. Review of Standard - RAW-CLEAN-Food-Certification-1.0-6.2015
2. Changes to Standard and creation of new version of Standard - RAW-CLEAN-Food-Certification-1.0.1-9.2015

### **Meeting Notes**

1. Given that there are various other Organic programs in US/Canada that are considered equal in merit to the National Organic Program, Section 5.1 was modified to state – “USDA National Organic Program (NOP) (or an equivalent program that requires at least 70% of the ingredients to be organic)”.
2. To accommodate certifications to food manufacturers in countries other than the USA, Section 4.1 was appended with text “To be eligible for R.A.W./C.L.E.A.N. Certifications, a food manufacturer must have a HACCP plan or an equivalent that satisfies the above directives.”
3. Given that HACCP plans may cover safety aspects of GMP, Section 4.3.3. was created to state “If a HACCP plan or equivalent exists, that will be considered satisfactory.”
4. Section 4.5.4 was created to state “To be eligible for R.A.W./C.L.E.A.N. certifications, the manufacturer must at minimum, have established what the Best By, Sell By and Expiration Dates are.”
5. Section 5.2.1 was created to state “In case you are using any ingredient in this list of crops with currently genetically modified varieties

<http://www.nongmoproject.org/learn-more/what-is-gmo/> – you must verify that you are not using genetically modified versions of those ingredients.”

## **VIII. C.L.E.A.N./R.A.W. Certification Standards Committee Meeting 1**

Date: October 13, 2016 from 4 PM to 5 PM EDT

Presentation Link: [www.join.me/vashivalive](http://www.join.me/vashivalive)

Conference Dial-In Number: +1-857-957-1115

Participant Access Code: 564196#

### **Summary of Meeting**

1. The first meeting of the members of the new Standards Committee 2016-2017 for C.L.E.A.N./R.A.W. Certification was held via telephonic conference on October 13, 2017.
2. The Corporate Governance of International Center for Integrative Systems was reviewed along with 3 major projects that the Center currently conducts:
  - a. Innovation Corps
  - b. Research on Systems Biology of GMOs, and
  - c. C.L.E.A.N./R.A.W. Certification
3. The Standards Committee reviewed 6 new amendments to the previous Standard.
4. Staff of the C.L.E.A.N./R.A.W. project reviewed the current growth and progress of the Standard nationally and globally.
5. The Standards Committee reviewed and itemized a detailed list of items to help build and grow the Standard.
6. The meeting was called to a Close.

### **Motions Passed**

1. All Committee members accepted their membership of the Standards Committee.
2. A motion was moved and passed unanimously to amend the current Standard with the updates below.
  - a. **SAFETY CRITERIA: HACCP OR EQUIVALENT ACCEPTABLE**  
*SECTION 4.1: "To be eligible for R.A.W./C.L.E.A.N. Certifications, a food manufacturer must have a HACCP plan or an equivalent that satisfies the*

*above directives.”*

- b. SAFETY CRITERIA: HACCP MAY COVER GMP  
*SECTION 4.3: “If the HACCP plan (or equivalent) addresses the GMP aspects, then the HACCP plan will also be considered satisfactory towards meeting the GMP criterion for R.A.W./C.L.E.A.N. certification. ”*
  
- c. SAFETY CRITERIA: SHELF-LIFE – DATES TO BE ESTABLISHED  
*SECTION 4.5: “To be eligible for R.A.W./C.L.E.A.N. certifications, the manufacturer must, at minimum, have established any one of*
  - a) Best By Date;*
  - b) Sell By Date; or,*
  - c) Expiration Date**”*
  
- d. ORGANIC CRITERIA: NOP OR EQUIVALENT; 70% BY WEIGHT  
*SECTION 5.1: “All prepared packaged foods seeking certification under this standard and ingredients must be certified organic under the USDA National Organic Program (NOP) (or an equivalent program that requires at least 70% of the ingredients to be organic) ”*
  
- e. NON-GMO: AFFIDAVIT  
*SECTION 5.2: “In case you are using any ingredient in this list of crops that currently include genetically modified varieties: <http://www.nongmoproject.org/learn-more/what-is-gmo/>, you must verify by providing documentation that you are not using genetically modified versions of those ingredients.”*
  
- f. RIGHT TO AUDIT  
*SECTION 9.0: “The Certification is inclusive of the right to audit the manufacturer’s processes and supporting documents any time during the period in which Certification is in effect.*

*If the manufacturer is found to be not compliant with this standard for CERTIFIED R.A.W. or CERTIFIED C.L.E.A.N for certain products, the manufacturer shall immediately desist from distribution or sale of those products in packaging that includes the CERTIFIED R.A.W. or CERTIFIED C.L.E.A.N imprimaturs.”*

- 3. The Standards Committee agreed unanimously to inform stakeholders of the current updates and to gain any feedback or significant objections prior to finalizing the Standard by end of 2016.

## **Attendee List**

### **STANDARDS COMMITTEE**

1. Alison Brushaber - Partner, Hail Merry Snacks  
([abrushaber@hailmerry.com](mailto:abrushaber@hailmerry.com))
2. Geoff Palmer - CEO, Clean Machine ([gpalmer@cleanmachineonline.com](mailto:gpalmer@cleanmachineonline.com))
3. Graham Rigby - Chief Innovation Officer, Organic India  
([grigby21@gmail.com](mailto:grigby21@gmail.com))
4. Prabhakar Deonikar – CSO, CytoSolve ([prabhakar@cytosolve.com](mailto:prabhakar@cytosolve.com))
5. Shari Leidich - CEO, Know Brainer Foods ([sharileidich@gmail.com](mailto:sharileidich@gmail.com))
6. Shiva Ayyadurai – Chairman & CEO, CytoSolve ([vashiva@vashiva.com](mailto:vashiva@vashiva.com))

### **STAFF**

1. Hari Subramanian – Meeting Facilitator ([hari@vashiva.com](mailto:hari@vashiva.com))
2. Lori Monetti – Operations Manager ([lori@rawfoodcertified.org](mailto:lori@rawfoodcertified.org))

## **IX. Public Hearing IV**

A Public Hearing held online on January 19, 2017  
from 1.00 PM to 2.00 PM EST

### **Agenda**

1. Introduction – Dr. Prabhakar Deonikar, CytoSolve, Inc.
2. Presentation – Hariharan Subramanian
3. Discussion and Questions – Attendees (See meeting notes)

### **Meeting Notes**

4. The meeting began at 10.00 am EST
5. Dr. Prabhakar Deonikar welcomed the attendees, and used a PowerPoint presentation to explain the background for the C.L.E.A.N. and R.A.W. standards, as well as the aspects of safety, minimal processing and bioavailability that they are based on.
6. Hariharan Subramanian used a PowerPoint presentation to review with the attendees that the last Standards Committee Meeting was conducted on Oct 13, 2016, where the following changes to the Standard were approved:
  - a. **SAFETY CRITERIA: HACCP OR EQUIVALENT ACCEPTABLE**  
*SECTION 4.1: “To be eligible for R.A.W./C.L.E.A.N. Certifications, a food manufacturer must have a HACCP plan or an equivalent that satisfies the above directives.”*
  - b. **SAFETY CRITERIA: HACCP MAY COVER GMP**  
*SECTION 4.3: “If the HACCP plan (or equivalent) addresses the GMP aspects, then the HACCP plan will also be considered satisfactory towards meeting the GMP criterion for R.A.W./C.L.E.A.N. certification. ”*
  - c. **SAFETY CRITERIA: SHELF-LIFE – DATES TO BE ESTABLISHED**  
*SECTION 4.5: “To be eligible for R.A.W./C.L.E.A.N. certifications, the manufacturer must, at minimum, have established any one of*

- a) *Best By Date;*
- b) *Sell By Date; or,*
- c) *Expiration Date*

”

- d. **ORGANIC CRITERIA: NOP OR EQUIVALENT; 70% BY WEIGHT**  
*SECTION 5.1: “All prepared packaged foods seeking certification under this standard and ingredients must be certified organic under the USDA National Organic Program (NOP) (or an equivalent program that requires at least 70% of the ingredients to be organic) ”*
- e. **NON-GMO: AFFIDAVIT**  
*SECTION 5.2: “In case you are using any ingredient in this list of crops that currently include genetically modified varieties: <http://www.nongmoproject.org/learn-more/what-is-gmo/>, you must verify by providing documentation that you are not using genetically modified versions of those ingredients.”*
- f. **RIGHT TO AUDIT**  
*SECTION 9.0: “The Certification is inclusive of the right to audit the manufacturer’s processes and supporting documents any time during the period in which Certification is in effect.*

*If the manufacturer is found to be not compliant with this standard for CERTIFIED R.A.W. or CERTIFIED C.L.E.A.N for certain products, the manufacturer shall immediately desist from distribution or sale of those products in packaging that includes the CERTIFIED R.A.W. or CERTIFIED C.L.E.A.N imprimaturs.”*

- 7. Hariharan Subramanian further presented that the following two changes have been proposed by other manufacturers:
  - a. Exclude non-certifiable ingredients from Organic certification criteria (e.g. ocean grown seaweed)
  - b. Remove 212° Fahrenheit restriction for heating of ingredients; rather consider bioavailability of nutrients
- 8. Hariharan Subramanian’s presentation ended at 10.20 AM.
- 9. Hayley Potter, Health-Ade, had the following question: What was the policy before including the Right to Audit (6.f above) in the Standards?

Resolution: There was no explicit declaration on physical auditing process before. This policy is newly included.

10. Hayley Potter, Health-Ade, continued: Who will incur the costs if an audit is completed?

Resolution: This has to be decided by the Standards Committee when they meet later this year.

11. There were no further questions and Hariharan Subramanian thanked the attendees and called the meeting to a close.

### **Attendee List**

Attendee ID	Name	Organization	Email
1	Hayley Potter	Health-Ade	hayley@health-ade.com
2	Elise Sween	Thomas Creek Farms	elise.sween@thomascreekfarms.com
3	Rick		



## **IX. Public Hearing V**

A Public Hearing held online on December 15, 2017  
from Noon to 1.00 PM EST

### **Agenda**

1. Introduction – Dr. Prabhakar Deonikar, CytoSolve, Inc.
2. Presentation – Hariharan Subramanian
3. Discussion and Questions – Attendees

### **Meeting Notes**

1. The meeting began at 12 Noon EST
2. Dr. Prabhakar Deonikar welcomed the attendees, and used a PowerPoint presentation to explain the background for the C.L.E.A.N. and R.A.W. standards, as well as the aspects of safety, minimal processing and bioavailability that they are based on.
3. Hariharan Subramanian used a PowerPoint presentation to review with the attendees that the last Standards Committee Meeting was conducted on Oct 13, 2016, where the following changes to the Standard were approved, that apply to both R.A.W. & C.L.E.A.N.:
  - a. *Separate documentation for C.L.E.A.N. and R.A.W.*
  - b. *Exclude non-certifiable ingredients from Organic certification criteria (e.g. ocean grown seaweed)*
  - c. *USDA changes:*
    - i. *FSIS not part of FDA*
    - ii. *USDA audits only Certifiers*
4. Hariharan Subramanian further presented that the following change that applies to C.L.E.A.N. was approved in the last Standards Committee meeting as well:

- a. *Remove 212° Fahrenheit restriction for heating of ingredients; rather consider bioavailability of nutrients*

## **X. Public Hearing VI**

A Public Hearing held online on November 29, 2018  
from 1.00 to 2.00 PM EST

### **Agenda**

1. Introduction & Presentation – Dr. Shiva Ayyadurai, International Center for Integrative Systems
2. Discussion and Questions – Attendees

### **Meeting Notes**

1. The meeting began at 1:02 pm EST
2. Dr. Shiva Ayyadurai welcomed the attendees, and used a PowerPoint presentation to explain the background for the C.L.E.A.N. and R.A.W. standards, as well as the aspects of safety, minimal processing and bioavailability that they are based on.
3. He also reviewed with the attendees that the last Standards Committee Meeting was conducted on Dec 20, 2017, where the following changes to the Standard were approved, that apply to both R.A.W. & C.L.E.A.N.:
  - a. *Separate documentation for C.L.E.A.N. and R.A.W.*
  - b. *Exclude non-certifiable ingredients from Organic certification criteria (e.g. ocean grown seaweed)*
  - c. *USDA changes:*
    - i. *FSIS not part of FDA*
    - ii. *USDA audits only Certifiers*
4. Dr. Shiva Ayyadurai also reviewed the following changes proposed to the Standards based on feedback from the community and stakeholders:
  - a. #1: Compliance with FDA's [FSMA Final Rule](#) for Preventive Controls for Human Food; manufacturers seeking certification or renewal in 2019 must

be required to produce documentation that complies with FSMA/HARPC versus the earlier requirement of HACCP.

- b. Should the Standards include requirements in [Proposition 65 - State of California Law](#) fully or in part?
  - i. According to this act,, products sold in the state of CA containing over 800 specific ingredients are required to display a cancer warning label
  - ii. There has been no decrease in deaths due to cancer since bill passed in 1986
  - iii. Citizen incentives for lawsuits based on perceived non-compliance to this act have shut down earnest businesses
- c. Carbon Footprint Certification - Should C.L.E.A.N./R.A.W. certifications include considerations for environmental impact of food production process - embrace Carbon Trust, Carbonfree® and other such certifications?