



BEYOND PESTICIDES

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October 12, 2016

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Re. PDS: Sunset reorganization

These comments to the National Organic Standards Board (NOSB) on its Fall 2016 agenda are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

Beyond Pesticides supports the proposal of the Policy Development Subcommittee for reorganizing sunset review of National List Materials.

As you probably have observed, Beyond Pesticides comments on every, or nearly every, material before the NOSB. Therefore, we hope to join with future boards in thanking you for tackling this issue. As we said in the spring, although we do have an opinion regarding the best option, the most important thing is for the NOSB to adopt some option –“even if it requires locking stakeholders in a room until they can all agree.”

We do not have a financial stake in the outcome of this issue, but we all have a stake in the process. It is important that the process facilitates the most effective deliberation and analysis possible. We want the NOSB –and the public– to have adequate resources to make good decisions. The board cannot make good decisions if there is not adequate technical support, or if the NOSB –and the public– do not have the time to process all the information. This affects the NOSB’s preparation of recommendations and the public’s ability to comment.

We support the principle of applying the original sunset date regardless of the actual review date. We hope that application of this principle will result in less self-interest among stakeholders in evaluating the options. We believe that other principles applied to the reorganization are also fair.

Therefore, we sincerely hope that you can “Just do it!”

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Terry Shistar, Ph.D.
Board of Directors