



BEYOND PESTICIDES

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September 30, 2015

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. MS/GMO: Excluded Methods Avoidance Strategy

These comments to the National Organic Standards Board (NOSB) on its Fall 2015 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.

Organic farmers do more than their fair share of preventing the spread of genetically engineered genes to their, as indicated by this proposed guidance, which spells out current practices. However, it is, as noted by the subcommittee, “an environment where GMOs are widely distributed throughout the food chain,” and there is only so much that can be done by those on the receiving end of the contamination. The NOSB must call upon the Secretary of Agriculture to reverse his policy of allowing more and more genetically engineered crops and to support legislation that places liability for damages on the patent holder.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Terry Shistar', written in a cursive style.

Terry Shistar, Ph.D.
Board of Directors