



BEYOND PESTICIDES

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September 11, 2012

National Organic Standards Board
Fall 2012 Meeting
Providence, RI

Re. PDS: Public Communications

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, 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 groups around the world.

The National Organic Standards Board plays an important role in bridging what has often been a sizeable gap between the organic community and the USDA. We thank the members of the NOSB for their commitment to serving as a communications bridge in addition to their other weighty responsibilities.

We support both elements of the proposed public communications policy. It is very important that the NOSB be able to express to the Secretary the views of the organic community that it receives. This is particularly true of views that are contrary to USDA's other policies, such as the views of the organic community concerning so-called "coexistence" with farming based on genetically modified organisms.

It is also important that the members of the NOSB have access to input from the organic community during all stages of its deliberations. The transparency policy passed at the Savannah board meeting will allow for the public to follow NOSB deliberations more closely. This policy will allow those who have information useful to the board to provide that information in a more timely fashion. We have seen instances in which the board has made proposals in good faith that were shown to be poorly informed when people with relevant experience appeared to give public comment. (The discussion of genetically engineered vaccines comes to mind.) Such expertise was not consulted by the contractors performing Technical Reviews, and may not have been known to them. Providing a mechanism for these people to give input earlier in the process and on an ongoing basis can save time and resources of both the board and the program.

While it may have been well-intentioned, we were very disturbed by the NOP announcement that instructed the public that communications with the NOSB outside of

designated comment periods is not appropriate. Limiting opportunities for the organic community to communicate with board members obstructs the board's functioning. We support the NOSB in asserting its desire to hear from the public through a mechanism like a public docket.

Thank you for your consideration of these comments.

Sincerely,

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

Terry Shistar, Ph.D.
Board of Directors