



# BEYOND PESTICIDES

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October 3, 2014

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. CS: Contaminated Inputs DD**

These comments to the National Organic Standards Board (NOSB) on its Fall 2014 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 groups around the world.

We appreciate the fact that the Crops Subcommittee is addressing this important issue. There are conflicting tendencies among organic producers —both good. On the one hand, organic growers enhance the biodiversity and productivity of their soils by recycling organic materials that others regard as waste. On the other hand, organic producers want to —and are required to— produce products and soil that contain as little toxic and prohibited material as possible.

Unfortunately, organic production is embedded in a world that is increasingly polluted, and many of the pollutants persist much longer than we would like. We can't just do the right thing without knowing what others are doing. We support research into all of the contaminants and pathways mentioned in this discussion document. We support research into means of preventing the contamination, which we believe must include restrictions on the way other people use many of those materials. Organic farmers are good neighbors —they take care of other people's waste, and they create buffer zones and havens of biodiversity that help their non-organic neighbors. Protecting organic farms from outside contamination will require a gatekeeper looking over what comes onto the farm, but it should also require more responsibility for those who use potentially dangerous materials. It all starts with gathering information, and we are happy to see that the NOSB is taking the first steps.

We urge the subcommittee and the Board to address this issue comprehensively, but begin releasing recommended guidelines in stages, beginning with pesticide residues, as quickly as possible. Organic integrity and the consumer trust necessary to grow the sector require grower and consumer confidence that land managers and policy makers are doing all they can to

monitor and protect against organic contamination by prohibiting substances. We recommend the extensive database of pesticide-related information on the Beyond Pesticides website.

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 style with a long horizontal flourish at the end.

Terry Shistar, Ph.D.  
Board of Directors