



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

April 26, 2012

National Organic Standards Board
Spring 2012 Meeting
Albuquerque, NM

Re. Comments on Letter to Secretary on GMOs

Dear Board Members:

These comments are submitted on behalf of Beyond Pesticides. 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.

We are happy to see the National Organic Standards Board (NOSB) communicating directly with U.S. Department of Agriculture (USDA) Secretary Vilsack about serious public concerns raised to the Board about GMO contamination in organic production. We support the Board's recognition of its duty to advise the Secretary that based on comments received by the board, "the USDA's actions to date on genetically engineered crops have been insufficient to protect the organic industry." We also strongly agree with the Committee's assessment that "the responsibility to prevent GMO contamination of organics is shared by those who develop, use, and regulate this technology."

As an organization with long-standing concerns about GMO contamination of organic production, we appreciate the establishment of an NOSB Ad Hoc Committee on GMOs to help organic producers and handlers avoid contamination across the supply chain. However, we also strongly believe that a larger share of the responsibility to prevent contamination of organic production must be borne by GMO technology developers and users. Organic producers bear a large and unfair share of the burden to prevent contamination from a technology that offers them no benefits. USDA must require that those who profit from GMOs participate in preventing contamination from GMOs, by mandating best management practices for contamination prevention by GM technology users. This would help ensure that those who choose to *not* use GMO technology can do so without the threat of contamination or loss from contamination. Serious attention to GMO contamination prevention would also help to assure organic consumers that the USDA supports their desire to eat organic food that is free from GMO contaminants.

NOSB Spring 2012 Meeting
Re. Comments on Letter to Secretary on GMOs
April 26, 2012
Page Two

We agree that “USDA actions are critical to the integrity of the organic seal and consumer confidence,” and we urge the NOSB to approve the Ad hoc GMO Committee’s letter and send it to the Secretary at the earliest opportunity.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry Shistar".

Terry Shistar, Ph.D.
Board of Directors