

Public Comment Summary

Comments submitted before October 1.

Policy Development Subcommittee

Conflict of Interest

Oppose: 4 consumers; 1 organization (Beyond Pesticides)

Support: 0

Partial Support): 1

Those who oppose the proposal say the NOP rules are arbitrary. If the NOP determines COI, it determines who votes and hence the decision, which is what Congress tried to avoid. The NOP proposal fails to disclose conflicts to the public and full board. The NOP proposal discriminates against representatives from nonprofit groups.

The OTA supports recommendations 6, 9 and 11. However, it does not support the remaining recommendations (1, 2, 3, 4, 5, 7, 8 and 10). It says:

- Vote reconsideration should not be retroactive (to before adoption of policy.)
- A Board member should be required to refrain from voting only when a direct financial gain actually exists. To the extent the financial interests of family members or associated entities do affect a Board member's own financial situation, they are already covered by the prohibition on actions that result in a direct financial gain to the Board member.
- Extending the scope of the COI policy to persons or entities associated with the Board member intrudes into private matters, and is likely to discourage qualified individuals from serving as members on this advisory board.
- OTA supports determination of COI by NOP instead of NOSB. There should not be pressure on board members to reveal conflicts to other board members.
- The process at NOSB meeting should mirror subcommittee process.

Policy and Procedure Manual Miscellaneous Changes

Oppose: 0

Support: 1 organization (Beyond Pesticides); 2 consumers

Points made by supporters include:

- The roles of the ABS and the DFO should be distinguished. " The ABS reports to the NOSB and should oversee the NOP staff.
- The changes provide clarity.

Policy and Procedure Manual Administrative Changes

Oppose: 1 organization (Beyond Pesticides); 3 consumers

Support: 0

Those opposing the changes note that the changes are not specified. It is not possible to determine from the proposal as presented what the changes are and whether they are truly “administrative.”