

The fundamental principle of organic production is *continuous improvement*. The realization and implementation of this principle depends on highly relevant and responsive research programs that address key informational needs of the organic sector.

### **GMO Ad-Hoc Committee**

#### Proposal on the Letter to Secretary Vilsack

We applaud the formation of the GMO Subcommittee and we strongly support the Committee's proposed letter to Secretary Vilsack expressing the concerns of the entire organic community about GMOs. GMOs pose a growing array of threats and challenges to organic farmers, organic production and organic markets.

The NOSB is well positioned to appreciate and understand these challenges and bears a responsibility to press the USDA and other agencies, by all means necessary, to develop policy responses and programs to effectively respond to them. We think this letter from the NOSB to the Secretary is entirely appropriate and, in fact, long overdue.

We will be extremely pleased if the Ad Hoc GMO Committee continues its work well into the future. We need a continuing effort by the Board to identify GMO-related problems, inform government officials and policymakers of their critical importance to organic agriculture and food production, and to propose and advocate for effective policy responses. The NOSB must not fail to take a lead role in this critical area.

### **Policy Development Committee**

#### Proposal on NOSB Meeting Public Comment Procedures

The ability of the public to present comments – both oral and written – is central to the effectiveness of the NOSB's work. The Board must have the opportunity to hear, and learn from, a broad and diverse range of perspectives.

We therefore support the Committee's proposals pertaining to public comment. Most particularly, we support the Committee's proposal to limit public comment to 3 minutes: this will go a long way in ensuring that all who wish to speak are afforded the opportunity to do so. At the same time we wish to stress that the opportunity for Board members to ask follow-up questions and engage with commenters, for extended periods, if necessary, is of critical importance. A key purpose of NOSB meetings is to engage in fact-finding that will, ultimately, result in improved recommendations for standards development. For this reason Board members must be able to fully explore any aspect of a given topic as they see fit. We trust the judgment and discretion of Board members to use this time efficiently.