

fertility and careful attention to field sanitation, to control diseases that affect bananas during shipment. These agricultural management practices, coupled with good sanitation during harvest and packing, were sufficient to control black sigatoka, which is specifically mentioned in the Technical Evaluation Report as an example of the need for post harvest application of gibberellic acid.

NOC asserts that control of postharvest diseases on organic produce must begin in the field. The NOP regulations lays out a step-wise approach for disease control in §205.206, which specifically requires the use of soil and crop nutrient practices (§205.206.a.1), sanitation measures to remove disease vectors (§205.206.a.2), and management practices which suppress the spread of disease organisms (§205.206.d.1).

NOC concludes that since banana producers report that careful management of field systems provides sufficient control of postharvest disease, there is no need to add a postharvest spray of a biologically-active plant hormone on organic bananas just prior to shipment for sale to consumers.

## **POLICY DEVELOPMENT COMMITTEE**

### **PUBLIC COMMUNICATION**

We heartily endorse the Board's clarification as to 1) their role in communication with the Secretary of Agriculture; and 2) the ability of the public to communicate at any time with the Board.

It is the statutory responsibility of the NOSB to communicate to the Secretary on any and all issues relating to organic that the Board deems important. Additionally, it is necessary that NOSB communicate issues of concern directly to the Secretary regarding organic that they have heard from the public, whether or not it is the subject of a proposed regulation, standards, or recommendations.

NOC greatly appreciates the statement of commitment to communication with the public in this Recommendation. We note a long history – from the inception of NOSB – of members working with the public on various issues, and feel that codification of that process now seems appropriate.

### **CONFLICT OF INTEREST**

NOC fully supports the NOSB Policy Development Committee in seeking to enhance the Board's existing conflict of Interest (COI) policy. Adding clarity to both the definitions and to the procedures for the Board to follow not only guarantees consistency for this current Board, but adds guidance for all future Boards. We applaud your work on this and feel it is very important to complete.

We also support the recommendation of the Center for Food Safety in recommending conflict of interest statements from contractors or consultants who write Technical Reviews or perform other work for the Board.

**PUBLIC COMMENT**

NOC generally agrees with the proposed Public comment procedures, but continue to object to the standardization of the 3-minute comment period. We would prefer to see a standard 5-minute comment period that is adjusted downward (i.e., first to 4, and only lastly to 3 minutes) as needed to accommodate all speaking requests.

The persistence of the 3-minute comment period gives heavy weight to those who can afford to bring more bodies to the meetings, and encourages us all to have more bodies present – thereby increasing the amount of time spent on our comments. This appears counter to the goal of saving time.

We thank the Board for its work and appreciate the opportunity to make this comment.

Sincerely,

A handwritten signature in cursive script that reads "Liana Hoodes".

Liana Hoodes, Director