



The Organic Specialists

May 3, 2012

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2648-So, Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-12-0017

RE: NOSB Policy Development Committee – Conflict of Interest

Dear Members of the National Organic Standards Board,

Thank you for your continued work to clarify and improve the procedures and policies by which the NOSB conducts its business. Wolf, DiMatteo + Associates (WDA) appreciates the opportunity provided through public comment to participate, as a stakeholder, in the unique National Organic Program public/private partnership.

WDA supports the Policy Development Committee’s recommendation #1 which retains the current NOSB Conflict of Interest Policy. As a FACA board the NOSB operates under a number of policies and procedures that guide the board as a whole, and the individuals who serve on the board on appropriate conduct, and protect the stakeholders from misuse of power or influence.

WDA does not support recommendation #2 as written. The recommended definition of “conflict of interest” goes too far by including “actual and potential direct financial interest” and including a Board member’s family and business or organization. We suggest a simple definition: “conflict of interest” is defined as a situation in which a Board member would derive a "direct financial gain." With this definition there is no longer a need for the definition of “immediate family member.” However, we support the definition of “direct financial gain” that is included in the current NOSB Conflict of Interest Policy.

The members of the NOSB are appointed specifically because they have direct experience and involvement in the sector of the organic community that they represent. Excessively limiting the participation of NOSB members does a disservice to the organic community and to the validity of NOSB decisions.

We deliver the strategic expertise to help organic, socially, and environmentally responsible products and projects reach their full potential—and flourish.

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WDA supports recommendation #3 as it articulates clearly the NOSB procedures regarding declarations of conflict of interest.

Sincerely,

Bill Wolf, Katherine DiMatteo and Sandy Mays
Partners

The partners and associates of Wolf, DiMatteo + Associates have over 100 years of combined experience in the organic sector. We have served hundreds of farms and businesses with their organic production systems and regulatory compliance, both nationally and internationally. We have been involved in the founding of several key organic organizations including the Organic Trade Association, Organic Materials Review Institute and the Organic Center. We are fiercely committed to continual improvement and to provide our clients and the organic sector with the tools to advance organic, environmental, and social practices.