GE contamination while not burdening organic growers, who are the victims of contamination of their seed stock. NOC encourages creative approaches that take into account that organic growers need seeds that are not contaminated by GE genes, are diverse and regionally-adapted to their growing conditions, and that costs to prevent contamination should be borne by the GE seed patent holders, who should be held accountable for the costs associated with their products.

POLICY DEVELOPMENT SUBCOMMITTEE

Public Communications

NOC has previously commented in detail in at least our last 2 comments to the Board (September and May 2012) that we fully support the direction of more communication with the Board. We specifically like the proposed ***Policy for Public Communication between NOSB Meeting*** voted by the Policy Development Subcommittee. NOC has recently been writing letters to the Board outside of Board biannual meetings and public comment periods directly through personal emails of those Board members who have agreed to receive this information. We think that a year-round public communication mechanism sponsored by the Board is preferable and more transparent. We appreciate this Recommendation.

Material Review Initiation Policy

We agree with the subcommittee that the initiation of materials review requires further discussion. Currently there are established policies for NOSB review of petitioned materials. However, there needs to be established procedures if a material comes to the NOSB by a process outside of the normal public petition process. NOC urges the NOSB to promote transparency and public participation in this process. In particular, technical reviews should be accessible to public so that they can provide comments of substance for the board.

CROPS SUBCOMMITTEE

OxyTetracycline – See separate submission by NOC for this petition

Polyoxin D Zinc Salt

NOC agrees with the subcommittee's recommendation to deny the petition to add Polyoxin D zinc salt to the National List. Polyoxin D is a broad spectrum fungicide, and as such is inherently incompatible with the basic principles of organic production. There are significant concerns about the capacity of this material to negatively affect non-target organisms, including beneficial fungi, insects, and aquatic species. Moreover, there are effective alternatives available control fungal pathogens--several currently allowed substances on the National List, crop rotation, crop nutrient management practices, sanitation to remove disease vectors, selection of resistant species and varieties (where applicable), beneficial antagonistic bacteria, and monitoring are listed in the TR as effective alternatives.