



# BEYOND PESTICIDES

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September 23, 2023

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave. SW.,  
Room 2648-S, Mail Stop 0268  
Washington, DC 20250-0268

**Docket # AMS-NOP-23-0026**

## **Re. CACS: Consistent Location Information**

These comments to the National Organic Standards Board (NOSB) on its Fall 2023 agenda are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers, and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

Beyond Pesticides appreciates continued efforts at fraud prevention by the National Organic Program (NOP) and the NOSB. However, the stated goal of the recommended NOP guidance is “database consistency,” and database consistency is not an end in itself. To evaluate whether we as an organic community should support this proposal, we must ask:

- Is the degree to which certifier databases lack consistency harming the industry?
- How can increased database consistency help the industry? Do proposed uses require greater consistency than what already exists?
- How will data be used?
- What are the costs of more precise requirements for certifier data collection?
- Do the benefits outweigh the costs?

Contrary to the CACS committee statement that “generally there is consensus that a consistent, industry-wide standard parcel location collection system would boost certifiers’ ability to verify information and more effectively monitor those parcels they certify,” the Ohio Ecological Food and Farming Association (OEFFA), the National Organic Coalition (NOC), and others expressed deep misgivings in spring 2023 comments to NOSB about this proposal. The failure to address all viewpoints should disqualify this proposal from consideration by the Board.

This proposal poses a burden—large or small—for those who would collect the data. The proposal suggests a reliance on GPS coordinates. We would like to understand exactly how this proposal would prevent fraud and support organic integrity.

We support the comments of OEFFA and NOC on this proposal and will not repeat them here.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Terry Shistar, Ph.D.  
Board of Directors