



BEYOND PESTICIDES

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March 28, 2022

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 ID # AMS-NOP-21-0087

Re. PDS: PPM Updates

These comments to the National Organic Standards Board (NOSB) on its Spring 2022 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 reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

We support the minor wording changes clarifying various forms of comment. While we agree with the intent to prevent commenters from making personal attacks, we suggest that the word “impugn” is not the right one. Merriam-Webster dictionary defines “impugn” as “to assail by words or arguments; oppose or attack as false or lacking integrity.”¹ It may be a fine point, but it is not necessary to prohibit a commenter from opposing a statement as false. We suggest that a better word might be “malign” (“to utter injuriously misleading or false reports about; speak evil of”).²

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors

¹ <https://www.merriam-webster.com/dictionary/impugn>.

² <https://www.merriam-webster.com/dictionary/malign>.