



# BEYOND PESTICIDES

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March 27, 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-22-0071**

## **Re. CACS: Organic and Climate-Smart Agriculture**

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

We are happy to see in the letter from Jenny Tucker, PhD seeking input from the NOSB that greater recognition is being given by USDA to the role that organic agriculture plays in mitigating climate change. The CACS draft response to Dr. Tucker does an excellent job of responding to her questions but fails to challenge the USDA framing of the issue.

As we should all be aware from the wildfires, floods, extreme heat events, and droughts of past years, climate change is an emergency that deserves to be met with a sense of urgency that we do not see in Dr. Tucker's letter. Dr. Tucker seeks proof that organic practices are climate-smart, and the CACS letter provides that, as well as responses concerning how organic producers demonstrate through their organic systems plans (OSPs) that those practices are in use in their operations.

More important to acknowledging the climate crisis and the value of organic as a solution, however, are questions concerning how USDA programs can assist organic producers and those seeking to convert to organic. The CACS addresses these as well. The CACS also points out the resiliency of organic agriculture:

“Organic is the solution to mitigating climate change *and* responding to it.” This is a point that USDA should stress in promoting conversion to organic farming.

An important caveat in stating that organic is climate smart is that NOP and certifiers must hold organic producers to the letter and spirit of the Organic Foods Production Act, which requires that organic production be soil-based, incorporate diversity, and protect the environment. Operations based on hydroponics or confined animal facilities, and those that replace native ecosystems with organic farms do not meet those requirements. The NOSB has made its position clear on those issues and must insist that NOP and certifiers carry out NOSB recommendations and consistently enforce the law—for the sake of reducing climate change, biodiversity loss, and human health impacts, as well as fairness.

In view of the climate benefits of organic and the incentives inherent in organic marketing, the real question is whether USDA will abandon its promotion of chemical-intensive agriculture supported by the biotech/chemical industry in favor of whole-hearted support for organic agriculture—because despite the astronomical growth in organic consumption in the U.S., conversion to organic agriculture lags behind demand. USDA could and should make adoption of organic/climate-smart practices a prerequisite for receiving the benefits of its programs.

One comment directed at the NOSB—the NOSB could increase the effectiveness of organic even more by making climate an explicit part of its analysis of materials and practices. The accelerating climate crisis to catastrophic levels, and anything in organic production or processing that might contribute to this emergency, falls within the purview of the NOSB in its review of the National List, petitions, and any related issues that should be addressed to Secretary of Agriculture in the Board’s role of providing advice to USDA.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry Shistar".

Terry Shistar, Ph.D.  
Board of Directors