



# 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. CACS: Oversight Improvements To Deter Fraud**

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.

This discussion document addresses two proposed mechanisms to deter fraud— inclusion of crop acreage on the organic certificate and a universal bill of lading. Both of these are critical elements of a strategy to deter fraud, but the proposals need some modification.

**Inclusion of crop acreage—and number of animals—is essential to determine whether the operation is, indeed, capable of producing the quantity of organic products that are offered for sale.** The reporting must be flexible for small acreages, such as mixed vegetable operations, where a single vegetable may occupy only a few feet of row. In addition, it is important to include the number of animals in livestock operations, so that the ratio of animals to acres of pasture may be considered. This information should be on the certificate as well as the Organic Integrity Database, since reports from the public are important in initiating investigations.

**A universal bill of lading—or at least universal minimum requirements for a bill of lading—are needed to ensure traceability of organic products.** However, there may need to be more than one set of requirements, since liquids like milk may be different from grains or

produce. While not every document needs to be standardized, it is important that a bill of lading report essential data in a format that can easily be tracked with the product.

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.

Terry Shistar, Ph.D.  
Board of Directors