



BEYOND PESTICIDES

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September 27, 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-22-0042

Re. CACS: Oversight Improvements To Deter Fraud

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.

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.

[Acreage Reporting Proposal](#)

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.

[Oversight Improvement Discussion Document](#)

We agree with the CACS that consistency is crucial to trust in organic certification. While, as noted by the CACS, failure to comply with record-keeping requirements does not

always reflect fraudulent activity, consistency in record-keeping is important to the identification and elimination of fraud in the organic supply chain. We therefore support efforts to bring consistency across all forms and procedures in the organic certification and enforcement process, including standardized audit forms.

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