



BEYOND PESTICIDES

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September 21, 2021

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-21-0038

Re. CACS: Letter to Secretary Vilsack

These comments are submitted on behalf of Beyond Pesticides as an addendum to comments to the National Organic Standards Board (NOSB) on its open docket request for input. 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.

First of all, we thank you for using the open docket to solicit input between board meetings. We believe that seeking public input early in the process can only improve NOSB proposals.

The NOSB proposes to send a letter to USDA Secretary Vilsack concerning climate change and agriculture and responding to USDA's 90-day progress report on its "Climate-Smart Agriculture and Forestry Strategy." We agree with the substance of the letter and believe that it is important for the NOSB to send this letter in its role of advising the Secretary.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Director