



# 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: Consistent Location Information**

These comments to the National Organic Standards Board (NOSB) on its Spring 2023 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.

Beyond Pesticides appreciates continued efforts at fraud prevention by NOP and the NOSB. This proposal poses a burden—large or small—for those who would collect the data. The discussion document appears to suggest that the grower would supply GPS coordinates to certifiers. While this may seem insignificant to the tech savvy members of our community, others—such as Plain Community farmers who use technology selectively in accordance with their religious beliefs and culture and members of grower coops in other countries—may find it more difficult.

We suggest that certifiers should collect the data—either at the time of farm visits or from electronic databases such as Google Earth. We would also appreciate a better discussion of how the data will be used to prevent fraud. Some growers of valuable portable crops (e.g., cannabis) or beekeepers may wish to engage in a discussion of whether the exact location data should be available in a public database like the Organic Integrity Database.

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