



BEYOND PESTICIDES

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October 1, 2015

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.,
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Re. MS: Research Priorities

These comments to the National Organic Standards Board (NOSB) on its Fall 2015 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.

Beyond Pesticides supports all of the research priorities proposed by the NOSB subcommittees. In particular, several of the research priorities involve research in a systems setting. We agree with the Materials Subcommittee (MS) that systems research is complex, takes time, and involves many confounding variables. Yet, organic production is such a system, and requires support from research conducted in a systems context.

We particularly support the livestock proposals to look at parasites, herd/flock health, and alternatives to methionine in a systems context. Too often debates on alternatives to methionine, for example, focus on single materials instead of whole systems. We encourage researchers on methionine alternatives to look at European systems that do not rely on synthetic methionine.

We support research on alternatives to chlorine in handling. We encourage researchers to use information developed by EPA's Safer Choice program as a starting place. Other questions that could help frame such research include: What are legal requirements for sanitizers and disinfectants? Is chlorine actually required in any food handling situations? When is cleaning sufficient and when is sanitization/disinfection required? What practices can eliminate the need for sanitizers and disinfectants?

We support research on alternatives to copper-based pesticide products, starting with an identification of the situations in which organic farmers believe it to be necessary. We agree that, "Targeted research is needed to identify management practices and less toxic alternative

materials for a wide range of crops,” and that the scope of the required research is probably beyond that of a technical review.

Finally, we were disappointed that we did not see a report of progress on the NOSB investigation into contaminated inputs. With farmers resorting to contaminated water resources in times of drought, we believe it is imperative that this work continue and that it address contaminated water resources as well as manure, compost, mulch, and other materials imported to the farm. It is likely that the need for research on contaminated inputs will exceed the resources of the NOSB and staff support, so this should also be identified as a research priority.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a long horizontal stroke at the end.

Terry Shistar, Ph.D.
Board of Directors