



BEYOND PESTICIDES

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October 11, 2016

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: Update to Secretary Vilsack concerning genetic engineering

These comments to the National Organic Standards Board (NOSB) on its Fall 2016 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 the action of the NOSB to update the Secretary of Agriculture regarding its progress in preventing GMO incursion into organic production. We believe that the proposed letter is a fair representation of NOSB activities. However, in reporting on the message from the public, the letter should include the message that the public views it as important that the cost of avoiding GMO contamination of organic farms and products be borne by those who profit most from the use of GMOs –the patent holders for GMO seeds and growers of crops using them.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors