



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

September 20, 2013

National Organic Standards Board
Fall 2013 Meeting
Louisville, KY

Re. CACS: Sound and Sensible Discussion Document

These comments are submitted on behalf of Beyond Pesticides. 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, 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 groups around the world.

Beyond Pesticides believes that the key to Sound and Sensible is a multi-level oversight system (inspection, certification, accreditation, and oversight of accreditation) managed with rigor and accountability. The discussion document appears to us to be heavily weighted towards the “sensible” side, while giving relatively little consideration to the “sound” side. We believe that focusing on a sound regulatory system can help relieve the burdens on those who are regulated.

A multi-level oversight system presents opportunities for distributing responsibilities for elements of the National Organic Quality System, such as documenting compliance of the primary system while equitably distributing administrative burdens across all levels. For example, in the NOP, the primary system is the certified operation, such as a farm or handling operation. Responsibility for the management of the quality of the primary system lies with farmers and handlers. However, by considering the multi-level oversight system as a whole, the responsibility for documenting the quality of the farmers/handlers should be shifted among the levels of the oversight system so that the burden of documentation is shared. The level of responsibility for management of the National Organic Quality system at each level of oversight (producer, certification agent, accreditation body) must be commensurate with the level of authority for which each level is responsible. Currently, the NOP (the highest level) has not completely fulfilled its responsibility, and the burden is overly heavy on the farmers/handlers. Beyond Pesticides believes that correcting the imbalance in oversight responsibilities is a cornerstone for successfully addressing many of the concerns that have arisen in discussions of the “Sound and Sensible” initiative.

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 prominent initial "T" and a long, sweeping underline.

Terry Shistar, Ph.D.
Board of Directors