



BEYOND PESTICIDES

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

March 11, 2013

National Organic Standards Board
Spring 2013 Meeting
Portland, OR

Re. PDS: Public Communications

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.

The National Organic Standards Board plays an important role in bridging what has often been a sizeable gap between the organic community and the USDA. We thank the members of the NOSB for their commitment to serving as a communications bridge in addition to their other weighty responsibilities.

We support the proposed public communications policy. It is important that the members of the NOSB have access to input from the organic community during all stages of its deliberations. The transparency policy passed at the Savannah board meeting will allow for the public to follow NOSB deliberations more closely. This policy will allow those who have information useful to the board to provide that information in a more timely fashion. We have seen instances in which the board has made proposals in good faith that were shown to be poorly informed when people with relevant experience appeared to give public comment. (The discussion of genetically engineered vaccines comes to mind.) Such expertise was not consulted by the contractors performing Technical Reviews, and may not have been known to them. Providing a mechanism for these people to give input earlier in the process and on an ongoing basis can save time and resources of both the board and the program.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.

Board of Directors