



BEYOND PESTICIDES

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November 9, 2011

National Organic Standards Board
Fall 2011 Meeting
Savannah, GA

Re. Comments on Research Priorities

Dear Board Members:

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.

We are happy to see the NOSB address the issue of setting research priorities. We, too, are frustrated by seeing requests for extensions for materials recommended to go off the list on certain date. In addition, we see committee recommendations for relisting supported by a mere statement that, “No new data was found.” The principle of continuous improvement in organic production suggests to us that all of us should be constantly seeking alternatives that use “management practices in preference to the use of off-farm inputs,” and meet goals “through the use of cultural, biological, and mechanical methods, as opposed to using synthetic materials to fulfill specific functions within the system.”¹

Like the committee, we welcome the prospect of a process that will help bring more research efforts to troublesome problems in organic production and handling. We look forward to a time when disagreements will be decreased by the availability of research into alternatives that everyone can support.

While we agree with the committee that this kind of research prioritization should not duplicate or replicate Technical Reviews, since TRs are designed to review existing research, we would like to take this opportunity to request better quality control over the TRs. To some extent, our complaint is with the committees, which should not be accepting as sufficient TRs

¹ “Principles of Organic Production and Handling”, adopted by the NOSB October 17, 2001.

that are clearly incomplete or flawed. We would support a return to the use of Technical Advisory Panels (TAPs), which incorporate more diverse viewpoints and expertise.

Requested Input from NOSB, NOP and Public Comment

1. What additions or changes would you make to the process for collecting and maintaining the list of research needs?

We support the committee's process for creating and maintaining a list of research needs and priorities. In particular, the process of reviewing research needs after every board meeting should be helpful, since these are times when the board hears from the widest range of interested people. We recommend that the meeting announcement highlight the board's desire to know about research needs. We think that a quick review of past issues that meet the committee's criteria for prioritization will help get the process started and give a context for evaluating new issues that arise. For example, the committee has already identified methionine and antibiotics in fruit trees as two issues that would rank high on the list.

2. Are there other criteria that you would want the board to consider when prioritizing research topics? What research needs would our proposed criteria have "missed" without the addition of additional criteria?

One category that may fit into what the committee considers "nebulous," but does not seem to have been explicitly considered, is the definition of "need" of some materials. If the need is not sharply defined, then the board cannot properly consider alternatives or hazards associated with the use. An example is the use of copper compounds in terrestrial crops that was considered at the April 2011 meeting. The listing for coppers does not specify the crops and diseases where it may be used. We believe that the NOSB cannot make an informed decision about the need for these chemicals without performing a specific analysis of need. Furthermore, OFPA requires ((7 U.S.C. 6517):

Content of List. The list established under subsection (a) of this section shall contain an itemization, **by specific use or application**, of each synthetic substance permitted under subsection (c) (1) of this section or each natural substance prohibited under subsection (c)(2) of this section.

This requirement is not being met in the case of the listing for coppers because the "specific use or application" is missing.

An additional criterion applies to the kind of research needed. Even though needs are commonly identified during the consideration of materials, the research that is needed is into systems that meet the identified need along with others. The apple and pear growers who depend on antibiotics, for example, are growing certain varieties because of their perception of the market. They are growing on certain rootstocks and with certain spacing for other reasons. They have also made choices regarding the diversity of their crop and cover crops. All of these,

and more, need to be considered by researchers looking into alternatives to streptomycin and tetracycline for fire blight control.

3. The committee proposes that the top priorities be reviewed on an annual basis. What benefits or drawbacks exist for extending or shortening this review time? Specifically with respect to research, funding and topic awareness time frames?

If the board is going to evaluate new topics after every meeting, an argument could be made for consideration twice a year. If priorities were evaluated less often than annually, it would be more difficult to ensure that researchers are informed in a timely way of the research needs of the organic community.

4. Is the collection, prioritization and publication of research needs a topic in which the NOSB should engage?

This is definitely an activity in which the NOSB should engage. The NOSB requires certain information to perform its function of reviewing materials. Identifying, prioritizing, and publicizing the research needs of organic production and handling are important steps in obtaining the needed information. But the information is important to practitioners as well as the NOSB, and it is also the function of the board to advise the Secretary of other aspects relative to OFPA, which includes “assur[ing] consumers that organically produced products meet a consistent standard.” And *that* requires the solution of problems faced by producers.

Thank you for this opportunity to comment on ideas for collecting, prioritizing, and publicizing research needs. We look forward to the implementation of this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar".

Terry Shistar, Ph.D.
Board of Directors