



BEYOND PESTICIDES

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April 22, 2012

National Organic Standards Board
Spring 2012 Meeting
Albuquerque, NM

Re. Public Communications Recommendation

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.

The National Organic Standards Board, in carrying out its statutory responsibilities, plays an important role in bringing to the USDA information, experiences, and perspectives directly from the organic community. 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 both elements of the proposed public communications policy. It is very important that the NOSB be able to express to the Secretary of Agriculture the views of the organic community that it receives. This is particularly true of views that may be at odds with current or proposed USDA policy, such as the views of the organic community concerning so-called “coexistence” with farming utilizing genetically modified organisms.

It is also important that the members of the NOSB have access to input from the organic community during all stages of their deliberations. The transparency policy passed at the last board meeting will, when implemented by the NOP, 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. However, during the public comment period and discussion on transparency, it became clear that the elements of communication necessary to establish a decision making process open to collaboration with the organic community needed further consideration. As a follow-up to those comments, we applaud the Policy Development Committee for bringing this Public Communications Policy Recommendation forward.

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While it may have been well-intentioned, we were very disturbed by the NOP announcement that instructed the public that communications with the NOSB outside of designated comment periods is not appropriate. Limiting opportunities for the organic community to communicate with board members obstructs the board's functioning. The process of collaboration between the NOSB and the public, as well as between the NOSB and the NOP, is a model for sound policy that ensures that the board stays in touch with the needs of the organic community and the core values and principles of the underlying statute. We support the NOSB in asserting its right to hear from the public throughout its deliberations as a means of more effectively meeting its statutory responsibilities.

The policy as written provides the proper balance between ensuring an open and collaborative process with the organic community, while giving the NOP the ability to establish the most cost-effective means of achieving this policy goal. Most government agencies provide a mechanism for ongoing communication on issues, and we are confident that NOP, with the direction of this proposed policy recommendation, can establish a process that enables the public to communicate with the NOSB throughout its deliberations.

Thank you for this opportunity to comment *within* the designated comment period.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry Shistar".

Terry Shistar, Ph.D.
Board of Directors