



# BEYOND PESTICIDES

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September 30, 2025

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave. SW.,  
Room 2648-S, Mail Stop 0268  
Washington, DC 20250-0268

**Docket ID # AMS-NOP-25-0034**

## **Re. CACS: Consistency in Organic Seed Use Discussion Document**

These comments to the National Organic Standards Board (NOSB) on its Fall 2025 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 eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

Strangely, the viewpoints represented in this discussion document appear to come from a perspective of a nonorganic producer, with statements such as: “[O]rganic production is more challenging in certain climates and regions, due to pest and disease pressure and resource needs.” “Organic seed producers report that the certification process is extremely time consuming and complex, **particularly if they produce both organic and nonorganic seed.**” [Emphasis added.] “Organic producers are required to maintain buffers to protect crops from contamination. The significant space requirements for isolating individual varieties as well as protecting them from off-farm drift adds to the costs and physical challenges to organic seed production.”

The NOSB and the rest of the organic community should be encouraging the production of organic seeds by organic growers, who understand the challenges and benefits of organic production. We would like to see a discussion document that addresses the challenges of organic producers moving into the seed production field. It should address the challenges presented by intellectual property and concentration in the seed industry.

It should be recognized that without a demand for organic seeds, they will not be produced. Organic growers know how to grow organic seeds, and the market will grow if the NOSB establishes a timeline for requiring them in certified organic agriculture. We have seen

this in the past with organic hops, when breweries said that organic hops were not commercially available and organic growers said that they could be made available if the NOSB required the use of organic hops. Where varieties that processors use are not available, the NOSB should require that an equivalent variety that has similar characteristics must be used if organic seed is available.

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 long horizontal stroke at the end.

Terry Shistar, Ph.D.  
Board of Directors