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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. LS: Integrating Livestock and Agroforestry

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.

Organic tree crops can be a good match for organic livestock. The Livestock Subcommittee (LS) has raised important issues that need to be addressed to meet necessary food safety requirements. However, we think this discussion document takes a broad view that may ignore important differences in the integration of livestock and agroforestry. As the LS has noted, the impact of “applying” manure may be different in different tree crops. The type of livestock is also relevant, as cow patties are distributed quite differently from sheep or bird droppings, for example. Management of the livestock also matters. If used to control weeds, moving sheep through an area quickly would avoid heavy deposits and break up the soil with the movement of hoofs.

We suggest making this a research priority to examine additional factors that might go into developing guidance for integrating livestock and tree crops.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors