



BEYOND PESTICIDES

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March 18, 2024

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-23-0075

Re. CACS: Support for Organic Transition

These comments to the National Organic Standards Board (NOSB) on its Spring 2024 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.

Transitioning agriculture to organic is critically important to addressing the existential threats posed by the climate, biodiversity, and health emergency in which we find ourselves. We thank the CACS for a thorough presentation of comments to the discussion document.

We support the goals outlined by the CACS: Support economically viable opportunities in organic; reduce costs by offsetting costs that organic producers bear; invest in relationship and trust building; and diversify and expand the organic community. We especially want to highlight the observation, "To achieve transformational change in agriculture and reach organic's full potential, transition resources also need to reach producers and supply chains that are not already aware of opportunities in organic." Transformational change is urgently needed in view of the health, biodiversity, and climate crises we face. We welcome the recognition that transformational change is needed and support all efforts to encourage transition to organic practices that do not result in weakening organic standards.

We support the comments of OEFFA and NOC on this document and will not repeat them here. Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors