



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

September 24, 2020

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-20-0041

Re. MS: Priority research issues

These comments to the National Organic Standards Board (NOSB) on its Fall 2019 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 reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

In general, Beyond Pesticides supports the MS list of research priorities. We question a few of the listed items as priorities, and we have one more suggestion. See additional comments below.

Research Priorities Should Address Needs of Producers and Not Sales.

A few of the identified priorities seem to be directed towards the issue of establishing organic food as a valid and valuable option in the marketplace. While this research is useful, it can be encouraged by organizations like the Organic Trade Association, leaving public resources available to address needs of organic producers. The items we would remove are:

Crops:

2. Conduct whole farm ecosystem service assessments to determine the economic, social, and environmental impact of farming systems choices.
8. Factors impacting organic crop nutrition, and organic/conventional nutrition comparisons.

Pesticide Development is an Inappropriate Organic Research Priority

9. Side-by-side trials of organic synthetic materials, natural materials, and cultural methods, with a request for collaboration with the IR-4 project. The IR-4 Project is “the primary entity in the United States to facilitate registrations of conventional pesticides and biopesticides on Specialty Food crops (fruits, vegetables, nuts, herbs, spices) and non-food Environmental Horticulture crops.”¹

Research is Needed Into Packaging Materials.

Research into alternatives to BPA has been identified as a research priority, but the need is greater than that. Some BPA “alternatives” are just as problematic as BPA. In addition, the proliferation of plastic in packaging is reflected in its presence in the environment. Organic producers and (especially) processors should be seeking ways to eliminate plastic. Since plastic is a relative newcomer to the set of packaging options, research should be able to identify options that have been used successfully in the past, but discarded, as well as newer, environmentally harmless options.

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors

¹ <https://www.ir4project.org/about-ir4/what-we-do/>.