



# 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: Risk-based certification**

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.

We are generally supportive of applying efficiencies in the certification decisions and/or offsetting certification costs to organic farmers whose practices perform a social good by addressing current existential crises related to pesticide-related health threats, biodiversity collapse, and the climate emergency. Ensuring integrity of organic products and public trust in the organic label requires rigorous application of the standards. However, increased rigor of enforcement carries with it the unintended consequence of greater cost to certifiers, producers, and consumers—thus, the need to prioritize increased attention to details. Balancing the need for streamlining the certification process without compromising the rigor of oversight may be difficult—as is evident from public responses shared by the subcommittee.

We appreciate the CACS proposal's emphasis on the goal to "grow the organic industry while continuing to uphold organic integrity." Seeking a balance between strict enforcement and avoiding undeserved burdens on certified operations, the proposal summary states the need for a "common set of definitions, baseline risk assessment criteria, the development of a process and matrix certifiers can use to determine the best certification approach to use per operation, and additional training and resource development." Accomplishing this is essential

to growing public trust in the organic label and growing the market. Having a set of definitions and criteria should take priority over another element that emerges in the proposal that could be its undoing and harm the market if not carefully navigated and controlled: “[C]ertifiers should use the same general risk criteria while being able to remain adaptable and flexible.” Flexibility and adaptability in defining risk can, as the CACS appreciates, undermine trust in the organic label. The standards for organic certification, recordkeeping, and compliance enforcement were established to set the organic sector apart from conventional chemical-intensive agriculture, which is devoid of this level of oversight to ensure a higher level of public and worker health and environmental protection. The requirements create assurances and trust in a label claim that brings with it a premium price.

Transparency in moving forward is absolutely critical to public trust. In that regard, the CACS indicates that this policy or guidance framework must be a collaborative process with the organic community in saying, “The Certification, Accreditation, and Compliance Subcommittee (CACS) hopes this proposal will aid in this collaboration to rethink the structure of the certification process in order to preserve its sustainability for the long term, while also ensuring organic integrity throughout the marketplace.” Whether it is “coordination with [Accredited Certifiers Association] ACA,” the development of a “matrix of activities to add to a high-risk operation’s certification,” or less burdensome requirements for “low risk (e.g., small producers) operations,” the opportunity for the public to be a part of the discussion is critical, given that a perceived weakening of oversight standards could cause serious economic dislocation. Therefore, we stress the essential need to engage all stakeholders, including consumers and farmers, as the CACS recommendation moves from paper to process. We urge that the ongoing deliberations on this proposal among regulators be subject to public comment. For that reason, we support adopting definitions as regulations. We support the proposal that the NOP publish a guidance document or instruction to certifiers in the NOP Program Handbook that establishes a baseline of common risk criteria. The NOSB should guide the development of that guidance.

As is true with all aspects of the NOSB’s work, continuous improvement is central to the growth of the organic sector and the role that organic plays in addressing critical health, biodiversity, and climate issues. In this spirit, we would like to see the Board attach a clear timeline to its proposal with a date certain for review, as well as adjustment and updating if needed. While we are generally supportive of the process in the CACS proposal for developing guidance concerning criteria and oversight processes. Given the many unknowns, however, we believe that it is important that such guidance be periodically revisited with a clearly defined sunset date that requires a reevaluation at a date certain. Therefore, when the guidance is adopted, it should include an expiration date, subject to an affirmative decision to retain or adjust the risk-based certification process.

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