



BEYOND PESTICIDES

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September 19, 2017

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

Re. PDS and All: Open Docket

These comments to the National Organic Standards Board (NOSB) on its Fall 2017 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 Spring 2013, the NOSB adopted a policy for Public Communication between NOSB Meetings. The policy states, “The NOSB and NOP seek public communication outside of Board biannual meetings and public comment periods to inform the NOSB and NOP of stakeholders’ interests, and to comment on the NOSB’s and NOP’s work activities year around.” It calls for the Advisory Board Specialist to, “with support from NOP, identify, implement, administer and maintain a year-round public communication mechanism (Internet and other means) by which public feedback can be received, posted, and archived online for viewing by the NOSB, the NOP, and the public.”

This policy has been implemented by extending the comment period, allowing people to submit comments earlier, before proposals and other materials are published. Those of us who are familiar with the NOP website –knowing where to find subcommittee notes, knowing that they are normally posted two weeks after the subcommittee meeting, and understanding the petitioned materials database– are able to give early input that may be helpful to subcommittees in examining the issues under consideration.

However, NOSB members seem reluctant, in general, to share information beyond that supplied by subcommittee notes, apparently in the belief that such information is confidential. However, the policy passed by the NOSB envisioned a two-way sharing of information. Those on the “outside” cannot know what information is appropriate to share without knowing more about the issues that subcommittees are studying. Errors and motions to send proposals back

to subcommittee could be reduced if the subcommittees published preliminary discussion documents or drafts during the interim period. The NOSB could thus be working in concert with the organic community for the benefit of all. As we all know, there is extensive knowledge in the organic community that could and should inform the deliberations of subcommittees addressing complex issues.

Therefore, we request that implementation of the open docket be expanded to include publication of drafts and questions for the public during the period between meetings.

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 prominent initial "T" and a long, sweeping underline.

Terry Shistar, Ph.D.
Board of Directors