



BEYOND PESTICIDES

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September 20, 2013

National Organic Standards Board
Fall 2013 Meeting
Louisville, KY

Re. PDS: Policy and Procedures Manual –Administrative Changes

These comments are submitted on behalf of Beyond Pesticides. 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, 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 groups around the world.

Beyond Pesticides cannot support the proposal of the Policy Development Subcommittee concerning administrative changes to the Policy and Procedures Manual (PPM). We cannot determine from the proposal as presented what changes are actually being proposed by this motion, and whether they are, in fact, “administrative” rather than substantive.

Changes of an administrative nature –that is reorganization, reformatting, and correction of grammar— are certainly desirable. However, you as a Board and we as members of the public should know what changes you are approving.

The PPM language included in the proposal contains highlighted strikeouts and underlines that also occur in that format in the miscellaneous changes proposal. At least one of these –the change separating the duties of the Designated Federal Official from those of the Advisory Board Specialist—is a change that we would call substantive (though we agree with it.) It is clear that other changes have been made in this version –the frequent misuse of “if” in place of “whether” is corrected, for example—but we have no way, other than sitting down with a copy of the old and the proposed language, to determine what changes have been made. We believe that you, as a Board, also need to know this, and suggest that you insist upon a red-lined version showing proposed administrative changes before voting. The text with administrative changes should not include “miscellaneous changes” addressed in a separate motion.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors