

PUBLIC COMMUNICATION

We fully support the following addition to the Policy Manual, as proposed by the PDC:

“NOSB Policy on Its Advisory Role and Communication with the Secretary of Agriculture.

Based on the communications and input it receives from the public the National Organic Standards Board may provide effective and constructive advice, clarification, and written information, as it deems necessary, directly to the Secretary of Agriculture after each of its Board meetings. This information is intended to facilitate public communication with the Secretary on critical issues that may emerge that it believes are important to the implementation and integrity of the organic standards and practices under the Organic Foods Production Act.”

This seems to be a no-brainer, since the role and responsibility of the Board is to advise the Secretary of Agriculture (7 USC 6518). We understand that the USDA Secretary may not always like to hear the concerns of the organic community, as with GMOs. However, this should be no justification for USDA officials to discourage the NOSB from communicating the organic community’s concerns.

The NOSB, and the scope of its responsibilities, were set up and mandated by Congress, not the Secretary.

We also fully support the following addition to the Policy Manual, as proposed by the PDC:

“NOSB Policy for Public Communication Between NOSB Meetings.

The NOSB accepts public communications to NOSB members outside of Board meetings and public comment periods to inform the ongoing deliberations of committee work. The Board requests that communications on specific subject matters be sent to the entire Board membership of the relevant committee or, on matters relating to the full Board, be sent to all Board members.”

We agree that the Board must receive and review information from the public during its deliberations, and that the opportunity for public comment should not be limited to the official public comment period, which occurs biannually.

The opportunity to formally communicate with the NOSB is especially important regarding materials petitions. Without the opportunity to formally receive comments from the public, the committees are likely to hear only from the petitioner and the TR when developing the committee proposal. It is absolutely

crucial that committee members receive comments from the public during their deliberations, which provide balancing information and positions, especially when the TR is inadequate, as has been the case in the past.

Preserving two-way communications between NOSB members and the balance of the organic community is consistent with the historically collaborative relationship that this unique regulatory framework was founded upon.