

III. POLICY DEVELOPMENT SUCBOMMITTEE

PROPOSAL:

PUBLIC COMMUNICATION

SUMMARY

We support the proposal to “establish a year-round online communication mechanism for stakeholders to communicate with NOSB and the NOP on matters of interest and concern.”

It is important for all members of the organic community to be able to communicate with all NOSB members throughout the year. This will benefit the NOSB and the organic community as a whole.

However, we strongly urge the NOP and NOSB to ensure that this mechanism will not become a substitute for any of the other vehicles for public announcements and participation that are already in place.

CORNUCOPIA’S COMMENTS

“Daily Digest” – Compiled by NOSB Special Assistant

We also believe it is unrealistic to expect NOSB members, who are busy enough volunteers as it is, to log on to the online forum on a regular basis to ascertain if there are any recent postings that are of note.

Therefore, we suggest that a “Daily Digest” email be sent to the NOSB members’ email addresses (as well as to interested public stakeholders). This will allow the proposed forum to become a means for NOSB members to keep a pulse on the organic community, without becoming overwhelmed with additional responsibilities for logging on or reading comments, some of which may be repetitive citizen comments on controversial issues of the day. The “Daily Digest” could synthesize citizen comments (e.g., “42 citizen comments opposing the use of XYZ in organics were posted”).

Again, the goal here is to leverage the time of NOSB members.

The “Daily Digest,” compiled and managed by the NOSB Special Assistant, would alert NOSB members if a document of interest is posted, and NOSB members could then log on and retrieve the document.

Early posting of discussion documents and other agenda items

We have been concerned with the short time frame for submitting comments to NOSB Discussion Documents and proposals.

For the Fall 2012 meeting, the agenda, proposals and discussion documents were posted in the August 30 Federal Register, with a deadline of September 24, giving the public 25 days to comment.

For the Spring 2013 meeting, the documents were posted on February 22 with a deadline of March 19, again giving the public 25 days. However, this time, the announcement to the organic community was delayed until February 25, cutting the comment period short an additional 3 days, to 21 days.

We urge the NOSB and NOP to consider ways to ensure the public has adequate time to analyze and comment on issues (and in the case of public interest groups, engage their membership). One way to lengthen the time frame for submitting comments is by posting discussion documents as they become available, rather than waiting for the semiannual meeting notice, using the proposed online communication mechanism and using the *NOP Insider* to alert the public.

Recent discussion documents have often been long, detailed and highly technical papers. These take time to read, research and analyze, and 30 days (or 21 days, as was recently the case) is simply not enough time to adequately address these extensive documents.

Some of these discussion documents were finalized prior to the agenda posting, sometimes weeks ahead of time. Since it is a discussion document, often with a long list of questions that the NOSB subcommittee seeks public input on, it would be helpful for the public to have access to these documents as they become available.

For example, the discussion document on “GMOs and seed purity” was first posted on August 17, 2012, for the fall meeting. The same discussion and questions were posted for the Spring 2013 meeting, but the public was not notified that this was forthcoming. The February re-issuance of the document states:

The Subcommittee would particularly like to hear from organic and identity-preserved seed and crop producers to learn about the challenges in preserving seed purity and enforcing protections from contamination.

The purpose for the re-posting was to gather additional input from organic seed producers and handlers. If additional input is desired on a discussion document, that can be decided at the NOSB meeting, and the document can be immediately re-posted. This would allow discussion within the organic community, and allow time for the input the NOSB is seeking. This was a missed opportunity.

The discussion document titled “Terminology for excluded methods” is dated February 6, so was presumably finalized on this date. But the public was not given the opportunity to begin analyzing the document until February 25, when the NOP publicized the availability of the documents. Nearly three weeks were lost when individuals and organizations could have been working on these discussion documents.

This could have allowed organic stakeholder organizations to spread out their workload as this discussion document was released, simultaneously, with many other proposals that deserved careful scrutiny and that might not have been, unlike the document in question, available for prior review.

Lengthen the public comment period for discussion documents.

We would also suggest that the deadline for commenting on discussion documents be lengthened, to at least 30 days past the date of the meeting.

Since discussion documents are not voted on, and additional information on discussion documents is helpful at any time before the subcommittee meets to draft a proposal, we believe an extended deadline for discussion documents would allow for more thorough analysis of and engagement with these documents by the public.

Based on written comments and public testimony, some stakeholders who originally communicated their opinions might want to add additional data or modify their positions subsequent to the meeting.

Previous suggestions

We appreciate the implementation of the suggestion by public interest groups, including The Cornucopia Institute, to post subcommittee meeting minutes as they become available. While there are still delays to the posting of the minutes, the availability of meeting minutes throughout the year has been of value and we hope that the NOP will further endeavor to reduce the lag time before these important documents become publicly available.

CONCLUSION

Cornucopia supports the proposal. We hope the communication mechanism will allow for two-way communication, and we urge the NOP and NOSB to post discussion documents as they become available.