



BEYOND PESTICIDES

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September 23, 2023

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 # AMS-NOP-23-0026

Re. CACS: Discussion Document on Improving Support for Organic Transition

These comments to the National Organic Standards Board (NOSB) on its Fall 2023 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.

Transitioning agriculture to organic is critically important to addressing the existential threats posed by the climate, biodiversity, and health emergency in which we find ourselves. Unfortunately, USDA's Organic Transition Initiative (OTI) and Transition to Organic Partnership Program (TOPP) have not lived up to our expectations.

Apparently, USDA expected little time from the program's inception to announcement of funds and support to the general public, but the lack of educational experience from some regional leads led to delays in coordination of contracts with partner organizations and in the planning of actual services to be offered. Usually, with grant funding, a contract is signed and plans for how the grant will be fulfilled are made *prior* to the time that deliverables are expected. In the case of TOPP, everything happened at once – which meant in practice that deliverables were delayed or diminished in value because the coordination and logistics had not yet been determined. Some have done almost a full year's worth of work to build this program without the funding to support their efforts.

Most importantly, the challenges in administering this program have resulted in low participation by farmers because of the very limited window of time for rollout and recruitment. For instance, the time from announcement of OTI-EQIP funding to the deadline was less than a month, resulting in few new applications.

Improving the program requires some changes of attitude from USDA. First, the agency must seek partnerships with organizations that are already providing relevant services. Second, USDA must trust those organizations to be experts in their fields. Third, plenty of time must be provided from when an opportunity is announced until the deadline for applying. Fortunately, none of these is a difficult change to make, and moreover the changes would have benefits for diversity, equity, and inclusion.

We support the comments of OEFFA and NOC on this document and will not repeat them here.

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