



# BEYOND PESTICIDES

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September 10, 2012

National Organic Standards Board  
Fall 2012 Meeting  
Providence, RI

## Re. PDS: Public Comment Procedures

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.

We thank the Policy Development Subcommittee for this opportunity to address the important issue of maximizing the public input into NOSB decisions. As the recommendation document points out, the NOSB has adopted policies and practices that encourage comments in person and in writing. The fact that so many people submit written comments and travel substantial distances to deliver short comments in person is a reflection of the growth of organic production and evidence of the public interest in maintaining organic integrity. We thank you for taking the time to read so many written comments and attend to so many people who offer their comments in person.

We support the committee's efforts to make a clear commitment to the time required to hear each person's comments. We believe that four minutes is a compromise worth trying. As we stated in previous comments, the precise time is not as important as the commitment to a designated amount of a time. At the same time, the board chair should be prepared to be flexible according to the circumstances. This includes allocating unused time to allow those on a waiting list to speak or to allow the board to ask further questions.

We have also seen that public comment can raise important new issues relating to board proposals. We hope that the NOSB and NOP, in planning these meetings, can allow for sufficient time to digest new information and deliberate before voting.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.  
Board of Directors