



BEYOND PESTICIDES

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November 4, 2011

National Organic Standards Board
Fall 2011 Meeting
Savannah, GA

Re. Comments on Transparency Policy

Dear Board Members:

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 support the recommendation of the Policy Development Committee to make the decisions of the NOSB more transparent by keeping records of meetings and other committee deliberations and making them easily accessible to the public. We support the recommendation that would require minutes to give a good representation of committee deliberations, including the range of opinions expressed and their source. Members of the NOSB are appointed as representatives of different interest groups —growers, handlers, retailers, certifiers, environmentalists, consumers, and scientists— and public understanding of the recommendations from committees is facilitated by knowing the positions presented by the various stakeholders. We also support the recommendation to make such documents available for public inspection and copying at the Agency, electronically via the World Wide Web; and upon written request in printed form.

Our system of government is based on the premise that government is a creature of the people, and is accountable to them. As is recognized by those interested in democratic principles of government, access to records and meetings and promotes equal and equitable access to government, encourages integrity in official conduct, and prevents undisclosed and undue influence from special interests.

Public sharing of all that goes into decision processes is essential for building public involvement and trust. In particular, technical information —Technical Reviews of materials, for example— should be made available as soon as possible. We also note that Technical

Reviews are sometimes posted with clearly biased and incomplete information. The committees have a responsibility to review the TRs to ensure their sufficiency, including balance. One example is the TR for sulfur dioxide, which does not even mention the fact that wine is made without sulfites.

Finally, we believe that a policy dealing with transparency should go in both directions. The NOP recently issued an announcement requesting that the public not communicate with the NOSB outside of official public comment periods. Since it seems that there has always been communication between individual board members and individual interested parties, we believe that attempting to shut the doors to public input in the interim between comment periods serves to stifle productive collaboration and force communication into a confrontational position-taking approach. It would be better to formalize a process for encouraging openness in communications between comment periods. We believe this issue should be addressed by the transparency policy under consideration.

We urge the Board to support this step —and more along the lines we have outlined— towards open and transparent decision-making.

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