



# BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003  
202-543-5450 phone ■ 202-543-4791 fax  
info@beyondpesticides.org ■ www.beyondpesticides.org

September 13, 2012

National Organic Standards Board  
Fall 2012 Meeting  
Providence, RI

## Re. CACS Discussion Documents

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.

## Calculating Percentage Organic Ingredients

We thank the Compliance, Accreditation, and Certification Subcommittee (CACS) for raising this issue in a discussion document. While it can be argued that more than one method of calculating the percentage of organic ingredients is valid, there is no doubt that neither compliance nor consumer expectations are served by using a variety of computation methods. We support this discussion in the hope that it will result in the adoption of a single consistent and transparent method. The method should also be consistent with other board efforts, such as the attempt to identify all ingredients (including so-called “other ingredients”.) This may require processors to learn the precise percentage of organic ingredients in their ingredients.

## Biodiversity Update

Our survival depends on our ability to protect biodiversity. Someone who lived before the advent of cities and agriculture would have encountered many more –perhaps hundreds more– different species of plants and animals every day. Chances are they would have met some that are now extinct or nearly so. Bison roamed the prairies –which themselves contained hundreds of plant species– but also eastern forests. White bears occasionally ranged as far south as the Delaware River. Skies were darkened for hours or even days at a time by flocks of birds. The forest of eastern North America was united by a mycelial mat from the Atlantic Ocean to the Mississippi River. These species were part of a community with the humans who lived there –species that humans might eat, or provide food for those they ate, or who might even eat them. Then and now, members of the community also interact in more complex ways –microbes in the gut of humans help digest our food, and microbes in the soil help feed plants.

**1. The CACS asks, Should the questions used on the checklist for materials review focus on asking whether a material has a positive impact on biodiversity, in addition to the question about harm?**

The conservation of biodiversity is both a core premise of organic land management and a specific requirement of organic crop, livestock, and wild crop certification. This compatibility between organic management and biodiversity reflects the primary importance that the original organic practitioners attached to nature as the model for successful agriculture. Conservation includes both protection and restoration. In keeping with the dual nature of conservation, questions on the checklist should address positive impacts on biodiversity, as well as potential harm. This is consistent with §205.200 of the regulations, which requires that “Production practices implemented in accordance with this subpart must maintain or improve the natural resources of the operation, including soil and water quality.”

**2. The CACS asks about Wild Farm Alliance guidance on conversion of native lands to organic production.**

We support the WFA guidance. It is critical to protect our few remaining intact ecosystems, and we agree with the WFA that, “If an operation is considering converting high conservation value land, the benefits of more farmable acreage is weighed against the loss of habitat functions that may provide pollinator and predatory insect food and cover, and water quality protection to the farm.” Specific steps, like those proposed by the WFA, are important in implementing biodiversity protection.

Many of the species that were once a part of daily life for people are now gone or very rare. They are gone for many reasons, but mostly because their homes were turned into farms and cities. Many species that enriched the lives of our ancestors are no longer here to enrich ours, but it is not just a matter of enrichment. Without those species, the communities they supported are crumbling. We see the loss of these communities in the proliferation of “invasive species,” climate change, and epidemics of disease. No longer are we simply losing “enrichment” –our own survival is now at risk.

**3. The CACS document says, “Comments from individual inspectors support the need more training. Education and training about biodiversity is needed at all levels of the organic food production process before the full capacity of improved biodiversity will be realized.”**

We agree that “from the farmer to the shopper, the value of improved biodiversity must be better appreciated and implemented.” All need to better appreciate nature’s ecosystem services: pollination, pest control, beneficial predation, advantageous fire, flood and erosion control, nutrient cycling, and improved water quality and quantity.”

4. ***The CACS document says, “An issue that has been reported is that some certifiers do not want inspectors to address §205.200 subject matter in inspection of handling operations.”***

We wonder whether the reluctance to address the impacts on biodiversity in inspecting handling operations may result from an assumption that indoor operations do not affect biodiversity. However, these indoor operations are not generally self-contained in that waste is generated that moves into air, land, or water. In addition, cradle-to-grave impacts of the materials used should be considered.

5. ***The CACS document says, “Wild Farm Alliance has provided the NOP suggestions for changes in the NOP’s audit checklist to address biodiversity standards in every audit of ACAs.”***

We support the suggestions provided by the WFA.

6. ***The document also says, “The CAC Subcommittee would appreciate receiving ... other suggestions on methods for strengthening biodiversity conservation within organic production systems for all scopes of accreditation, particularly handling.”***

As noted above, handling operations do interact with the ecosystem. While various regulations address such issues as waste management, water usage, wastewater effluent, and air emissions, they do not focus on biodiversity issues to the extent that OFPA does. The fact that water leaving a processing facility goes to a sewage treatment plant does not relieve the processor from the responsibility to minimize the effluent and its polluting properties. Similarly, cradle-to-grave impacts of the materials used should be considered. Siting of facilities may also pose issues.

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.  
Board of Directors