



BEYOND PESTICIDES

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April 23, 2012

National Organic Standards Board
Spring 2012 Meeting
Albuquerque, NM

Re. Public Comments Recommendation

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 thank the Policy Development Committee 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 five minutes would be a better time limit than three minutes, but 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.

This may be a good opportunity to comment on the problems and inconvenience regarding travel arrangements that arise when meeting dates are changed after being announced, as was the case with this Spring 2012 meeting. The dates advertised for the meeting, up until Monday April 9, were May 21-24. On April 9, the NOP announced an agenda for meeting May 22-25 –a day less at the beginning *and* a half day longer on the end. This situation poses real problems for people who need to make arrangements for transportation, lodging, and time from work.

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Thank you for this opportunity to comment on public comment procedures.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry Shistar".

Terry Shistar, Ph.D.
Board of Directors