



BEYOND PESTICIDES

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April 22, 2012

National Organic Standards Board
Spring 2012 Meeting
Albuquerque, NM

Re. Conflict of Interest 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 clarify and strengthen the NOSB's Conflict of Interest Policy. Since the NOSB is an advisory committee composed of representatives of various segments of the diverse organic community, it is helpful to have policies that differentiate between representing a segment of the organic community and advocating for one's personal interest. Most importantly, transparency in the NOSB's decision-making process requires disclosure of interests.

The recommended changes in the policy will help clarify when a conflict or potential conflict exists. It is particularly helpful that the policy lays out steps for its application.

We would like to point out that the NOSB is a board of "representatives," and, as such, should probably not be described as being appointed "because they have professional expertise." The board members are appointed to represent various interests in the organic community. Although the interests do carry with them expertise that is important to the board's functions, the positions are designed to be *representative*. There is thus an even stronger reason that an inherent conflict of interest may exist.

In addition, "declaring an interest" is not the same as recusing oneself. On occasion, we have seen board members "recuse" themselves without declaring an interest. We believe that transparency requires both.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors