



BEYOND PESTICIDES

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

September 20, 2013

National Organic Standards Board
Fall 2013 Meeting
Louisville, KY

Re. CACS: Retail Certification Discussion Document

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.

Beyond Pesticides agrees with the Subcommittee that there is a need for clarification and we look forward to seeing input regarding areas of the rule that are unclear. Where the retail operation is certified and has a mixed operation, it must be made clearer than it is now that there is product sold and produced or processed on the premises that does not meet organic certification standards. It is not uncommon for people to think that everything sold or processed in a certified organic retail store is organic. It is critical that certifiers make a determination on the adequacy of the labeling and store signage. Guidance is needed to ensure that labeling and signage are adequate.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors