



BEYOND PESTICIDES

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April 26, 2012

National Organic Standards Board
Spring 2012 Meeting
Albuquerque, NM

Re. Comments on Research Priorities

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 are happy to see the NOSB address the issue of setting research priorities. We, too, are frustrated by seeing requests for extensions for materials recommended to go off the list on certain date. In addition, we see committee recommendations for relisting supported by a mere statement that, "No new data was found." despite the need for research to advance alternatives. The principle of continuous improvement in organic production suggests to us that all of us should be constantly seeking alternatives that use "management practices in preference to the use of off-farm inputs," and meet goals "through the use of cultural, biological, and mechanical methods, as opposed to using synthetic materials to fulfill specific functions within the system."¹

Like the committee, we welcome the prospect of a process that will help bring more research efforts to troublesome problems in organic production and handling. We look forward to a time when targeted research will identify alternatives to difficult problems that everyone can support.

While we agree with the committee that this kind of research prioritization should not duplicate or replicate Technical Reviews, since TRs are designed to review existing research, we would like to take this opportunity to request better quality control over the TRs. To some extent, our complaint is with the acceptance as sufficient TRs that are clearly incomplete or inadequate in providing a comprehensive assessment of options and opportunities. We would support a return to the use of Technical Advisory Panels (TAPs), which incorporate more diverse viewpoints and expertise.

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¹ "Principles of Organic Production and Handling," adopted by the NOSB October 17, 2001.

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We support the committee's process for creating and maintaining a list of research needs and priorities. In particular, the process of reviewing research needs after every board meeting should be helpful, since these are times when the board hears from the widest range of interested people. We recommend that the meeting announcement highlight the board's desire to know about research needs. We agree that the review should be done annually. If priorities were evaluated less often than annually, it would be more difficult to ensure that researchers are informed in a timely way of the research needs of the organic community. We think that a quick review of past issues that meet the committee's criteria for prioritization will help get the process started and provide context for evaluating new issues that arise. For example, the committee has already identified methionine and antibiotics in fruit tree production as two issues that would rank high on the list.

We suggest that an additional criterion be added, applying to the kind of research needed. Even though needs are commonly identified during the consideration of materials, the research that is needed is into *systems* that meet the identified need along with others. The apple and pear growers who rely on antibiotics, for example, are growing certain varieties because of their perception of the market. They are growing on certain rootstocks and with certain spacing for other reasons. They have also made choices regarding the diversity of their crop and cover crops. All of these, and more, need to be considered by researchers—not as individual alternatives, but as part of a complete system— when looking into alternatives to streptomycin, tetracycline, or other chemicals for fire blight control.

Food safety is an area that should be prioritized for research. Often we see the NOSB *assuming* a need for strong chemicals as cleaners or disinfectant when none may be needed. We have seen this in our own investigations with personal care products using the biocide triclosan. Research has shown that washing with ordinary soap and water is as effective as using soap containing triclosan. We need research into effective means of cleaning food contact surfaces and food containers with organic and natural cleaning methods, such as hot water or steam or materials more compatible with organic processing, including hydrogen peroxide or ozone. We need research on organic systems, including growing, harvesting, storing, and transporting crops in ways that avoid the need for rinsing in highly chlorinated water.

Thank you for this opportunity to comment on the proposal for collecting, prioritizing, and publicizing research needs. We look forward to the implementation of this process.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors