



C O R N U C O P I A
I N S T I T U T E

June 10, 2014

Secretary Tom Vilsack
Room 200-A Whitten Building
U.S. Department of Agriculture
Washington, DC 20250

Dear Secretary Vilsack –

The Cornucopia Institute has some recommendations regarding the National Organic Standards Board (NOSB) that we are offering to you for your consideration. Our motivation is to partner with the Department in creating a truly exemplary program, as Congress envisioned, protecting the integrity of the organic label.

This year, as you know, four new members will be appointed to the NOSB. When Congress passed the Organic Foods Production Act in 1990 (OFPA), they designated membership slots on the NOSB for various constituencies involved with organic food and agriculture and defined the criteria for those slots.

Because of the important role of the NOSB, The Cornucopia Institute believes that the organic community would be best served by a transparent selection process allowing stakeholders to weigh in on potential appointees to the Board. At one time, prior to the Obama administration, the names and backgrounds of nominees were made public. We are calling on you to return to this type of process.

We are not asking you to release the full application forms that individuals submit to the USDA for appointment to the NOSB. Much of the information contained on that form is not essential or even germane to public feedback. Rather, we are explicitly interested in the name of the individual and the slot for which they are applying. Many in the organic community would welcome the opportunity to provide constructive feedback on the potential appointees and

help ensure that the best and most qualified individuals are the focus of the final appointment process that you and the Department exercise.

An increase in transparency would decrease the possibility that an appointee to the NOSB does not meet the letter of the law and the requirements stipulated by OFPA. For example, as we have brought to your attention before, one of the four farmer slots on the NOSB was filled with the appointment of an individual who was not an active farmer or owner of an organic farm at the time of her appointment (as specified by OFPA). We know of a number of truly exemplary farmer-candidates who were passed over that particular year.

The Cornucopia Institute also wants to bring to your attention our renewed call for a modest stipend for NOSB members not associated with a corporation or a cooperative with strong financial resources. The workload for the volunteers on the Board is significant. Many dedicated members spend hours every week reviewing documents, engaged in committee calls and other phone conferences, and preparing to attend the several day semi-annual meetings of the NOSB. A number of citizen members of the board (particularly farmers) must find additional labor and/or help to allow their meaningful involvement in the process. This contrasts with other board members who's employers are able to cover their costs of involvement.

A modest stipend, we believe, would address the imbalance that is currently weighing upon some members of the Board. It will also help ensure that capable and qualified individuals continue to come forward for a potential appointment to a 5-year term on the Board.

We thank you for your consideration of the concerns raised in this letter and look forward to working with you and others in the Department on organic and other agricultural issues.

Sincerely,

A handwritten signature in cursive script that reads "Will Fantle".

Will Fantle
Codirector