

October 26, 2016

National Organic Standards Board  
USDA-AMS  
1400 Independent Ave. SW  
Washington, D.C. 20250  
Re: AMS-NOP-16-0049

Docket # AMS-NOP-16-0049

Dear National Organic Standards Board Members:

The following comments are submitted to you on behalf of The Cornucopia Institute, whose mission is to support economic justice for family scale farming.

## **POLICY DEVELOPMENT SUBCOMMITTEE**

### **Sunset Review - Efficient Work Load Reorganization**

#### **SUMMARY**

The Cornucopia Institute **supports** the proposal of the Policy Development Subcommittee for reorganizing Sunset review of National List Materials.

It is important that the Sunset review process facilitates the most effective deliberation and analysis possible. That means that the NOSB and the public must have the technical support and time to process all the information submitted during the Sunset process. If the NOSB does not have the time to fully appreciate the public's comments and recommendations, the NOSB's own recommendations will be incomplete and may be materially flawed.

Cornucopia is particularly focused on the NOSB's ability, as empowered by Congress, to secure TAP reviews by *neutral* third parties for material review.

A more balanced workload will make that process more practicable, particularly if similar materials are grouped together. We want the NOSB to have adequate resources to make good decisions. These technical reports, when conducted by fair and impartial researchers, also help to educate and inform the public.

We, in line with Beyond Pesticide's comments, also support the principle of applying the original Sunset date, regardless of the actual review date.

Cornucopia also appreciates that the regulations.gov website was open longer for comments prior to this Fall, 2016 meeting. Extending this period benefits both commenters and the NOSB.

We further request that both the agenda and meeting materials be released earlier, so that the public has more time to respond. Publishing meeting materials as early as possible will give the organic community more time to survey impacted stakeholders and make comprehensive comments. Many organic stakeholders, and Cornucopia members, are farmers with busy schedules, who will also benefit from getting the meeting materials as soon as possible.