

Formal Recommendation
From: The National Organic Standards Board (NOSB)
To: The National Organic Program (NOP)

Date: April 28, 2022

Subject: Policy and Procedures Manual (PPM) Revision

NOSB Chair: Nate Powell-Palm

The NOSB hereby recommends to the NOP the following:

Other: X

Statement of the Recommendation:

The NOSB recommends minor clerical changes for clarity to the Policy and Procedures Manual (PPM). A sentence requiring written commenters to refrain from personal attacks was added for consistency with parameters for oral comments. A redundant header “Oral Comments” was also removed.

Rationale Supporting Recommendation:

The NOSB’s [Policy and Procedures Manual \(PPM\)](#) was established to assist the NOSB in the implementation of its duties under the Organic Foods Production Act (OFPA) and the Federal Advisory Committee Act (FACA). The PPM contains operating procedures and policies for the NOSB, along with a framework for public comments.

Public commenters supported the update to the PPM, and provided some additional feedback about terminology that the PDS will consider for a future update. Commenters reflected in their written statements that discourse is powerful, and it may be difficult to offer rebuttal without direct reference to previous statements by other commenters. They went on to note that respectful dissent is allowed and appreciated in public comments.

NOSB Vote:

Motion to accept the proposal on the PPM update to the public comment process

Motion by: Mindee Jeffery

Seconded by: Jerry D’Amore

Yes: 15 No: 0 Abstain: 0 Absent: 0 Recuse: 0

Motion Passed

**National Organic Standards Board
Policy Development Subcommittee Proposal
Policy and Procedures Manual (PPM) Revision
January 19, 2022**

Introduction and Background

The [Policy and Procedures Manual \(PPM\)](#) was established to assist the National Organic Standards Board (NOSB) in the implementation of its duties under OFPA. It contains operating procedures and policies for the NOSB. During the period since the last revision (October 2019), the Policy Development Subcommittee has been compiling a list of minor revisions and suggested changes. The PDS has reviewed these suggested changes and proposes the following as listed in the table below.

Summary Table of Changes

Section/Page	Changes (red highlight indicates additions, strikethrough indicates deletions)
VIII. E Page 33	Made minor clerical changes for clarity. Added a sentence requiring written commenters to refrain from personal attacks. Removed a redundant header "Oral Comments".

E. PUBLIC COMMENT

The NOP and NOSB encourage public comment and work collaboratively to increase opportunities for greater participation by a broad range of people, employing various modes of communication and modern technology whenever possible. ~~Individuals may present oral comment at either a pre-meeting electronic webinar or at the in-person NOSB meeting.~~ **Individuals are encouraged to submit written comments and may also** present oral comment at either a pre-meeting electronic webinar or at the in-person NOSB meeting.

Comments Before Public Meetings:

Written comment:

All members of the public are encouraged to submit public comment in writing according to the Federal Register Notice. Written submissions allow NOSB members the opportunity to read comments in advance, eliminate or decrease the need for paper copies to be distributed during the meeting, and allow each NOSB member to review and analyze data and information well ahead of the public meeting and possible voting.

Commenters shall refrain from including personal attacks or remarks that might impugn the character of any individual.

Oral Comments

~~Oral comments:~~ **Individuals may present oral comment at either a pre-meeting electronic webinar or at the in-person NOSB meeting.** ~~May be received via a virtual meeting/webinar.~~

Public notice of such electronic meetings will be included in the Federal Register notice announcing the public meeting. Such electronic pre-meetings may allow individuals more time

to present their data or information, reduce the need to attend the public meeting in person, reduce our carbon footprint, and give the NOSB more time to absorb the information. Such electronic meetings shall be recorded and made available to the public and to NOSB members.

Motion to accept the proposal on the PPM update to the public comment process

Motion by: Mindee Jeffery

Seconded by: Jerry D'Amore

Yes: 3 No: 0 Abstain: 0 Absent: 0 Recuse: 0