

National Organic Standards Board Policy Development Committee

Recommendation for an addition to the NOSB Board Policy Manual: Content and Structure of Recommendation Documents

September 18, 2008

INTRODUCTION:

The Policy Development Committee is recommending an improved outline for clarifying the process for writing committee recommendations. The following outline provides the suggested improvements and would be included in the Board Policy and Procedures Manual. The purpose of this recommendation is to create more process and structure for writing committee recommendations.

The following addition to the PPM includes eliminations of current text in the Policy Manual for Section V (page 21) in strike through, and additions in red font:

OUTLINE FOR WRITING COMMITTEE RECOMMENDATIONS

This section provides an outline to be used by committees in writing a recommendation document. These guidelines not only allow consistency in the content of NOSB recommendations, but should also provide the NOSB, and the public, a fast manner to weigh the advantages and disadvantages of a proposal.

Recommendations not related to material petitions or sunset reviews, should include the following sections:

- I. Introduction:
This section consists of a brief summary of the recommendation, its main issues and its relevance to the organic community. This section should also mention the goals and intent of the proposed recommendation.
- II. Background:
This section should present the issues that justify the development of the recommendation as well as any relevant work done by the NOSB in the past.
- III. Relevant areas in the Rule:
This section should mention any areas of the Rule or OFPA which provide the basis for the recommendation.
- IV. Discussion:
This section should be used to expand on the intent of the recommendation. It is also a place to emphasize the SWOT of the recommendation (strength, weaknesses, opportunities and threats). No recommendation is 100% perfect and this section can serve to clarify the tradeoffs and advantages of a recommendation. Thus, it is advisable to mention all major alternatives reviewed by the committee. If appropriate, different stakeholders groups should be identified indicating how each group's needs are met or affected.

V. Recommendation:

This is the core, or deliverable, of the recommendation.

VI. Committee Vote:

This section should present the names of the members who moved and second the motion to approve the recommendation. It should also list the votes including number of abstentions and absences. As a norm, a motion should always be presented in the affirmative.

Minority opinion:

If applicable, the dissenting opinion(s) of committee or task force members shall be reported. A member of a committee can present a minority report to the committee recommendation. Such document should include reasons for opposing a proposed recommendation and cite where the opposition points are in the recommendation. In addition, the minority report could, provide alternative approaches or solutions from those given in the recommendation, or recommend an amendment to the recommendation. The minority opinion will be included as a separate document at the end of the recommendation.

PROCEDURES TO FOR PRESENTING COMMITTEE RECOMMENDATIONS

NOSB committees and task forces will follow the outline presented below in order to present draft policy and/or material recommendations for consideration by the Board at meetings of the Board:

Introduction—A brief summary of the issue or statement of the problem.

Background—An explanation with sufficient detail and rationale to support a proposed recommendation, including reasons why the recommendation should be adopted, historical context, and the regulatory framework pertinent to the issue.

Recommendation—The concise text of the recommended action.

Committee vote—The vote of the committee or task force shall be reported.

Minority opinion— If applicable, the dissenting opinion(s) of committee or task force members shall be reported.

Committee vote:

Moved: Barry Flamm

Second: Bea James

Yes- 3 No- 0 Absent- 1