



I am writing to log my comments about the final proposed rule to exempt organic farmers from mandatory assessments. As both an organic farmer and employee of an organic farmer coop, I have seen very little substantive effort from the dairy, beef and pork promotion boards with regards to organic markets. Below you'll find my comments.

- 1) Clearly the money from organic farmers is not being used to improve the market situation for organic farmers. The money wrongly assessed to organic farmers is used to promote the broad commodity category. It is interesting to note that these assessments do nothing to improve the plight of family farms as they continue to decline in numbers.
- 2) congress's intent for this law is to clearly exempt organic farmers from the non-organic market assessments. Unfortunately through some chicanery on the part of the USDA staff, there is an attempt to limit those who are exempt to only those that sell 100% of their farm production as organic. If I understand the rule correctly, an organic farmer is not able to claim an exemption on ANY organic commodity if they sell ANYTHING on the conventional market. This is ludicrous and in my opinion is a bureaucratic or politically motivated attempt to insure as little money as possible from organic farmers is diverted from the market assessment programs. ANY FARM PRODUCTION THAT QUALIFIES AS CERTIFIED ORGANIC AND IS SOLD AS SUCH SHOULD BE EXEMPT FROM ANY COMMODITY CHECKOFF.
- 3) THERE IS NO NEED FOR AN ORGANIC FARMER TO APPLY ANNUALLY FOR EXEMPTION OR AT ANY OTHER TIME. This is a waste of time and money. Instead, the commodity marketing assessment boards need to take that ORGANIC ASSESSMENT MONEY they've been getting and send a letter of notification to everyone who is making the deduction (buyers of livestock production) and that the information about organic exemptions be included in all future literature about commodity checkoffs. Instead, it appears the USDA is further punishing the organic farmers for being NON-conventional.

So, as our Vice-president Cheney likes to say, "sometimes it's time for a check-up from the neck-up."

The proposed rule is for exempting organic farmers from conventional commodity promotional assessments is clearly DISCRIMINATORY. What's the matter? Are you folks against organic family farms, or what?

Thanks for the opportunity to express my opinion.

Sincerely,

received
6-25-04

Allen Moody
Bear Creek Cattle Company
La Farge, WI 54639