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To: The National Organic Standards Board
c/o Keith Jones; Room 4008 -South Building
1400 and Independence Avenue, SW
Washington, D.C. 20250-0001

(Submitted by e-mail to: NOSB.pdc@usda.gov)

Dear NOSB members:

I appreciate the second opportunity to comment on the NOSB's draft "Compatibility with Organic Production and Handling." I submitted comments on the earlier version of the document and have now reviewed the version dated January 30, 2004. I see that many changes have been made in response to public comments and I applaud your efforts in this regard. I am largely supportive of this draft with one exception, as explained in the comments below.

For the record, I am especially supportive of inclusion of Criteria k), and l) because I think they reflect two very important principles of organic agriculture:

"k) Is there adequate information about the substance to make a reasonable determination on the substance's compliance with each of the other applicable criteria? If adequate information has not been provided, does an abundance of caution warrant rejection on the substance?"

"l) Does use of the substance have a positive impact on biodiversity?"

On the other hand, I so not support inclusion of Criterion m): "Does the substance facilitate the development of new organic products?"

As stated in my earlier comments, I have concerns about the practical application of criteria that are not easily quantifiable. In my opinion, Criterion m) is an example of this problem and I urge that it be deleted.

Respectfully submitted,

Lynn S. Coody

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