

From: Pooler, Bob
Sent: Tuesday, April 01, 2003 11:00 AM
To: Strother, Toni; Neal, Arthur; Hayden, Beth; Ashley, William; Wilson, Demaris; Benham, Katherine; Jones, Keith; Mathews, Richard
Subject: FW: NOP Rule 205.203

Public comment on composting

-----Original Message-----

From: Tom and Ruth Earle [mailto:Tom_Ruth@ncia.net]
Sent: Tuesday, April 01, 2003 10:07 AM
To: Pooler, Bob
Subject: FW: NOP Rule 205.203

-----Original Message-----

From: Tom and Ruth Earle [mailto:Tom_Ruth@ncia.net]
Sent: Friday, March 28, 2003 11:29 AM
To: NOP.Webmaster@usda.gov
Subject: FW: NOP Rule 205.203

Dear Bob, Vicki Smith at the New Hampshire D.A. gave me your address as a destination for this letter. My server would not deliver it at the address below. I would very much appreciate it if you could forward it to the appropriate people.

Thankyou for your consideration, Tom Earle

-----Original Message-----

From: Tom and Ruth Earle [mailto:Tom_Ruth@ncia.net]
Sent: Friday, March 28, 2003 11:22 AM
To: nop.webmaster@usda.gov
Subject: NOP Rule 205.203

To Whom It Concerns: I am a small organic producer who has for 22 years worked at the very margins of survival to make an extremely challenging upland New Hampshire farm site productive and increasingly self-supporting. The local Natural Resource Conservation Field Officer recommended that I sell gravel from the site when he first viewed it in 1981. We have instead produced organic produce for over 23 seasons supported by as many as 116 families within our community. We have been erratic participants in the N.H.D.A. Organic Certification Program as our families come to the farm on a weekly basis contributing labor as well as financial support and they are our primary certifiers. We have, however, been certified several times over the years especially when we expect to sell more of our produce off farm through Farmers' Markets and Restaurants. This is the case in 2003. Imagine our surprise when we were told that our compost and manure handling would not meet the requirements of NOP rule 205.203. Our compost is made from on farm manure that is hand cleaned from cow, sheep, and chicken, sheds, mixed with soil, garden waste, and rock powders, and piled in long windrows at least 4 to 5 feet high. This mix is then further covered with a four inch skin of decent loam soil and Biodynamic preparations are placed into it. The compost stands from July through to late April, May, or June when it is incorporated in the gardens. Early temperatures in the pile approach 140-150°F but these fall quickly. We do not in fact

appreciate the temperatures required in rule 205.203 (2)(iii). Extended high temperatures often lead to an extensive white mold within the pile which is the result of excessive temperatures and large scale microorganism die off. When the piles are utilized in our raised beds in late spring they are usually a deep rich loam like humus that enables us to grow good crops on very light sandy loam soils. In 22 years of producing vegetables using only composted manures and garden wastes we have increased the organic matter within our soils, thus its water retention, have through rotation been able to harvest crops from these very marginal soils on a yearly basis, and have had nothing but satisfied customers. To be told that our practice which is the description of careful craft is not certifiable is highly absurd. Our customers tell us that they especially appreciate our lettuces, our spinach, our prolific oriental greens, that they are discovering what it means to eat fresh locally produced organic produce. Your rule on the other hand says we cannot call ourselves organic; how do you justify this position? We have in fact through our hands on, low impact approach demonstrated and taught the art of successful organic farming/gardening for 22 years . We are now told that we can only call ourselves organic if we follow composting rules that require prohibitive labor both in monitoring and in excessive hand turning. I ask you to please rewrite this rule so that small operations such as ours can continue to practice organic farming!

Sincerely yours, Tom Earle

Earle Family Farm

27 Baird Hill Rd.,

Ctr. Conway, N.H.

03813

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