

NATIONAL CAMPAIGN FOR SUSTAINABLE AGRICULTURE

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DRAFT TALKING POINTS ON REVISED ORGANIC RULE

The revised Organic Rule is coming soon, and we need to get ready to respond quickly and with unity! Toward this end, the National Campaign for Sustainable Agriculture has developed the following draft talking points. They are meant to be a tool for evaluating the revised rule and defining the terms of the debate. We encourage you to use these talking points with the media and as a basis for action alerts and other materials.

Please note that these draft points were written before the release of the revised rule to support a quick response to the release. Soon after the rule is out, the Campaign will develop a much more detailed analysis and updated talking points. Contact the Campaign if you want to receive this information.

The National Campaign for Sustainable Agriculture is a leader in coordinating advocacy for strong and workable National Organic Standards. The Campaign works with dozens of organizations to build consensus, develop policy positions and strategies, and mobilize grassroots action.

DRAFT TALKING POINTS

1. Support family farms and small businesses.

Small farms and businesses led the way in creating the organic market, but now their existence is threatened by consolidation, globalization, and burdensome requirements. Every point in the National Organic Program must be assessed for its impact on small- and medium-size farms and businesses, and the rule structured to address their needs. USDA should cover the full cost of its accreditation program at least for the first five years; if fees are assessed later they must be on a sliding scale. The burden of paying for residue testing and other requirements should be shifted from small farmers to the state or federal government. Organic standards should recognize and address the particular needs of small operations.

2. Maintain high standards for organic production.

National organic standards should be based on the highest standards currently in use. The national program should include provisions for improving these standards and expanding them to encompass such areas as the needs and rights of farmers and farmworkers for equity and social justice in organic agriculture. The standards should meet or exceed the recommendations developed by the National Organic Standards Board (NOSB) in all areas. Any lowering of standards would conflict with current industry practices, international standards, and consumer expectations, and would be very damaging to the organic market.

3. Strengthen the partnership between USDA and existing certifiers.

Currently, organic certification is performed by private and state organizations. For the National Organic Program to succeed, USDA must work with these organizations in a spirit of partnership and not overreach its statutory authority. USDA can play a useful role by accrediting existing programs; making sure they adhere to high standards and follow fair and transparent procedures; and ensuring they practice reciprocity so that organic products flow freely in the marketplace. This includes working with certifiers to provide for disclosure of and public access to appropriate certification information. USDA also should develop a rational, cost-effective enforcement system that directs resources where they are most needed -- to ensure compliance by large-scale enterprises.

Overleaf

4. Respect the authority of the National Organic Standards Board.

The National Organic Standards Board (NOSB) must remain a full partner in developing organic standards, the USDA accreditation program, and all aspects of the program's implementation. NOSB must also retain authority for developing National List recommendations--and USDA must follow its recommendations. Encouraging public participation through hearings and written comments is crucial. To maintain the integrity of the NOSB, criteria for selection of board members proposed by leading groups in the organic community must be respected.

5. Protect organic farms and food from contamination by GEOs and their by-products.

Consumers have a right to choose food free of Genetically Engineered Organisms, and have sent a strong message to USDA that they want organic food to be "GEO-free." USDA must meet this expectation, but without penalizing the organic industry for contamination caused by drift or other forms of genetic pollution. Organic farming and processing must be protected from GEO contamination, and the costs of testing and liability for drift must be borne by GEO manufacturers, not organic or other farmers.

6. No factory farming in organic production.

Factory farming is inconsistent with organic principles, which view livestock as part of an integrated, ecological system. USDA must eliminate loopholes in organic standards that allow factory farm practices such as continuous confinement, animal mutilations like de-beaking, and dry lots (dirt enclosures without access to pasture).

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