

PUBLIC COMMENT

TO: USDA-National Organic Standards Board

FROM: Bruce Krantz, V-P/Gen. Mgr. Hynite Corporation

RE: REVIEW OF LEATHER MEAL

DATE: November 15, 2000

When reviewing Hynite's petition to allow the use of hydrolyzed leather meal, please consider the available science and disregard unsubstantiated opinions. The Organic Trade Association and many organic certification agencies (OCIA, NOFA, CCOF, FVO) have established standards in organic crop production which prohibit the use of leather meal WITHOUT REASON. These organizations have not reviewed the compelling arguments in favor of leather meal and will not review leather meal until the national organic standards are established. Without reviewing the wealth of information contained in Hynite's petition, these agencies have only unfounded opinions to offer. Leather meal has never been subjected to a bona fide technical review in organic agriculture. You (NOSB) are the first and only organization with established guidelines to conduct a technical review of fertilizer materials used in organic food production. Please review hydrolyzed leather meal according to your official guidelines and avoid the conclusions offered by those who have not seen Hynite's petition.