

Ms. Eileen Stommes, Deputy Administrator, USDA  
P.O. Box 96456  
Washington, D.C. 20090-6456

Re: Docket No. TMD-94-00-2

Dear Ms. Stommes,

As a natural and organic foods consumer who wants to preserve the high standards currently proposed by the National Organic Standards Board, I wish to submit my comments on USDA's Docket No. TMD-94-00-2 regarding proposed national organic standards regulations. My following comments begin with reference to the section numbers of the proposed rule:

(Sec. 205.20 - 205.28) I recommend that the USDA write the proposed rule according to National Organic Standards Board (NOSB) recommendations and recognize the authority of NOSB in making determinations of allowable materials and processes used in organic production. NOSB includes organic, environmental and consumer experts who have the knowledge, credibility, and congressional authority to make important decisions on regarding ingredients and processes allowable in organic foods labeling. The USDA's broad latitude to lower standards under the current proposed rule does not inspire consumer confidence in new national standards.

(Sec. 205.2, 205.7, 205.9, 205.22, 205.26, 205.17) Broad categories of materials and processes prohibited by the NOSB are proposed to be allowed in organic foods production by the USDA. I do not want genetically engineered organisms (GEOs), sewage sludge, and/or ionizing radiation (irradiated foods) allowed in USDA's regulations for organic foods. Inclusion of these materials and processes would place U.S. standards in conflict with existing high industry standards, consumer expectation, and international standards. In fact, I expect my "organic" label to prohibit the use of these processes.

(Sec. 205.13 - 205.15, 205.22, 205.24) Please do not dilute standards for organic livestock production. Organic livestock should have access to the outdoors; should be fed only organic foods, and should not be fed antibiotics, drugs, or other unnecessary hormones or additives.

(Sec. 205.421-205.424) I believe that small, local farmers should be encouraged to grow organically. USDA proposes a regressive flat fee for certification and registration. Since local farmers have the freshest product available, make it possible for them to get certification doing business on a small scale. Make large scale production farming pay for their fair share of certification, registration, and administration costs of the program.

(Sec. 205.103) I do not believe that USDA should prohibit other "green" labeling that is useful to consumers. Labeling such as, "pesticide-free", "no antibiotics or hormones", "free-range", "humanely raised", or "integrated pest management", are useful designations for consumers to make intelligent choices. Prohibiting the use of these green labels takes choice away from consumers who then can't tell the difference between products that don't meet "organic" labeling standards.

Consumers like myself, have worked long and hard to assure the best possible foods for our children. National standards can help. However, please do not inadvertently lower the standards we have come to rely upon by making it too easy for large corporations to call their foods "organic". Please follow the recommendation of the National Organic Standards Board.

Sincerely,

Name:

Address: