



GreenStar

COOPERATIVE MARKET

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February, 1998

Eileen S. Stommes
USDA-AMS-TM-NOP, Room 4007-S
AgStop 0275
PO Box 96456
Washington, DC 20090-6456

Dear Ms. Stommes,

I am writing to request that the USDA withdraw the proposed National Organic Program's Proposed Rule concerning organic standards (docket # TMD-94-00-2), rewrite it so that it is in accordance with the Organic Food Production Act of 1990, and resubmit it for public comment. I choose to buy organic and support organic production, and am deeply concerned that the proposed regulations will compromise the integrity of organic certification. Some of my main concerns with the proposed Rule are:

- ✦ I am opposed to the inclusion of synthetic substances, such as antibiotics used as pesticides, piperonyl butoxide, and toxins derived from genetically engineered bacteria, in organic systems.
- ✦ I am opposed to the use of genetically engineered organisms in organic systems. The use of GEOs is completely unnecessary to high-quality organic production, and there is inadequate data concerning GEOs' long-term effect on human health and the environment.
- ✦ I am opposed to the use of ionizing radiation (food irradiation) on food labeled "organic". Its long-term effects are still unknown, and this practice has never been allowed in organic production.
- ✦ I am opposed to the use of biosolids (sewage sludge) in organic farm practices. Sewage sludge may contain heavy metals and toxins which are not appropriate for use on land where food is grown for human consumption.
- ✦ I do not support the refeeding of animal parts and manure to livestock or intensive confinement of livestock. These practices have never been a part of organic production.
- ✦ I am concerned that previously contaminated lands, such as Superfund sites, may, under the proposed Rule, be certified organic without adequate consideration. Current organic standards insist that the entire history of the land be taken into consideration before organic certification.
- ✦ I support small organic farmers and certifiers and I think that the flat fee causes them to bear a disproportionate burden of administrative costs.

Under the proposed Rule, many of these dangerous, unacceptable and completely unnecessary practices may be allowed in organic production. Please demonstrate your integrity by protecting the integrity of organic farming and certification practices and the consumer's right to choose organic.

Sincerely,

(name)

(address)

