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re: (Docket Number: TMD-94-00-2)
Vol 62, No. 241 12/16/97
Subchapter M
Organic Foods Production Act
Part 205 NOP
General comments

I am extremely concerned about USDA's proposed NATIONAL ORGANIC PROGRAM (NOP) now being submitted for public comment. The NOP Rules completely disregard the long established meaning and practices of organic agriculture and instead allow a huge number of injurious farming methods, synthetic substances, chemical adulterants and toxic constituents to qualify for a federal organic label. These include but are not limited to irradiating food, using toxic sewage and industrial sludge as fertilizer, allowing genetically manipulated organisms in crops and food, permitting confinement factory farm operations and allowing synthetic food processing aids, adulterants and additives.

In fact, none of these or some 60 plus other allowances outlined in the NOP Rules have EVER been considered Organic or permitted as such in the marketplace by the existing state, national and international organic certification organizations. This program will completely gut the meaning of Organic and allow spurious products in the marketplace. In addition, USDA's proposed excessive fee structure will automatically disenfranchise a large number of existing organically certified family farmers and will put many of the organic certification organizations out of business.

Further, under the bogus USDA Organic label, farmers, processors, and retailers will be prohibited from identifying products in the store based on production practices. Consumers, parents, personal health supporters, environmental advocates and many others will definitely lose their freedom of choice-- and they are not going to be happy about it.

Finally, USDA's actions regarding the formulation and execution of the NOP should be investigated immediately. They have definitely pulled a bureaucratic end run around the letter and intent of the original Organic Foods Production Act of 1990 (OFPA) and are in clear violation of a great number of its precepts. As such USDA is openly liable for legal action. USDA should be required to start over and come up with a valid NOP based on the OFPA mandates, accepted international standards, and the comments of the NOSB-- without giveaways to the special interests.

I look forward to your response at your earliest convenience.

Sincerely,