

ORGANIC FOODS AND FARMING IN PERIL
Exercise Your Right For Pure And Unadulterated Food

This public comment work sheet on the Proposed Rule allows you to make a direct comment to the Department of Agriculture on many important issues. Just take the time to read the "How the USDA's Proposed Rule Contradicts the Organic Foods Production Act (OFPA)" and circle your response on the right. Complete the back, sign and print your name and return address. We encourage you to make extra copies for both your House and Senate representatives. Fold with the USDA address out, affix stamp and mail. Or slip this work-sheet into your own envelope. With completing and sending this work-sheet you will have made clear to the USDA your position on these issues. Email comments may be sent by contacting www.ams.usda.gov/nop

Please reproduce and circulate. Comments also may be sent by fax to (202) 690-4632.

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Visit our website at <http://www.iquest.net/ofma/> for more detailed information on all organic issues

Docket: TMD-94-00-2	<i>How the USDA's Proposed Rule Contradicts the Organic Foods Production Act (OFPA) of 1990</i>	Circle whether the section of the Proposed Rule is:
National List: Sec. 205.22(c)(9), 205.22(c)(5) and 205.13(a)(3), 205.22(c)(6), (c)(11), (c)(1), (d), 205.22(c)(10) and 205.7(c)(2), (iii), 205.22(g), 205.24(b)(c) and (f)	Violates OFPA Section 2105, Section 2118(b), (c)(1)(A) and (B)(i). <i>The proposal allows for the use of categories of active synthetic substances in organic farming like Piperonyl butoxide (a toxic synergist), amino acids used as growth promoters, antibiotics, boric acid and acetic acid used as pesticides, genetically modified substances (GMOs), high soluble synthetic substance to correct a nutrient deficiency, a cation balancing agent like potassium sulfate, cotton defoliant, pest control substances for livestock, nutrients and dietary supplements and feed additives, all synthetic substances that cannot be considered for use under the National List Procedures. (OFPA does not allow consideration of such substances for use in organic crop or livestock farming.)</i>	Unacceptable Acceptable
National List: Sec. 205.14(b) and (b)(1) and (2), 205.22(c)(3), 205.22(f), 205.24(d)	Violates OFPA Section 2118(b). <i>The Proposal allows categorical use in organic farming and livestock production of active synthetic substances like vitamins and minerals, animal drugs and parasiticides, without itemizing by specific use or application as required by OFPA. (OFPA mandates itemization of such possibly allowed substances by specific use or application.)</i>	Unacceptable Acceptable
National List: Sec. 205.20(b)(3)(ii)	Violates OFPA Section 2118(b), (c)(1) and (A) and (B)(ii). <i>The Proposal does not provide for the review, evaluation and inclusion on the National List of synthetic inert substances. The Proposed Rule allows synthetic inert ingredients to be used on organic farms without review for toxicological concern. (OFPA mandates all synthetic inert substances used in organic farming be reviewed, evaluated and included on the National List.)</i>	Unacceptable Acceptable
National List: Sec. 205.2, 205.17(a), and 205.26	Violates OFPA Section 2105 and 2107(b)(1)(C) and 2111(a) and (a)(1) through (4), Section 2118 (b), (c)(1) and (A) and (B)(iii). <i>The Proposal allows for synthetic food additives, processing aids, enzymes and ingredients (incidental additives) in processed foods labeled and sold as organic. (OFPA mandates no synthetic substances may be added during food processing.)</i>	Unacceptable Acceptable
National List: Sec. 205.26	Violates OFPA Section 2105 and 2107(b)(1)(C) and 2111(a) and (a)(1) through (4), Section 2118 (b), (c)(1) and (A) and (B)(iii). <i>The Proposal allows for genetically modified organisms (GMOs) in processed food labeled and sold as organic. (The NOSB recommended no GMOs.)</i>	Unacceptable Acceptable
Definitions: Sec. 205.2 defined, 205.3(b)(2), 205.7(c) 205.17(a), see, 205.13(a)(3), 205.7(b)(4) 205.28(a)(4)(i) 205.20(b)(2), 205.16(2)(iii)	Violates OFPA. <i>The Proposed Rule creates new definitions, categories, criteria and exceptions that would allow wide use of synthetic substances in organic farming and processing of organic foods. The new terms defined in the Proposed Rule that are meant to circumvent OFPA are: "non-synthetic," "incidental additive" "synthetic amino acid additives," "non-active residue"; "non-agricultural ingredient", "non-organic agricultural ingredient or product", "active ingredient in any input other than pesticide formulations", "inert ingredient in any input other than pesticide formulations". The use of these and terms in the Supplementary Information of "inconsequential additives", "extraneous additives" and "unintentional additives" as acceptable in organic farming and handling indicates the Department does not support existing organic farming, processing and handling standards.</i>	Unacceptable Acceptable
National List: Sec. 205.22, 205.24	Violates the authority and role mandated by OFPA, Section 2104(c) and 2118(d)(1) and (2), 2119(a), (k), (l) and (2), (L). <i>The Department usurped the National Organic Standards Board's</i>	Unacceptable