

Eileen S. Stommes
Deputy Administrator
USDA-AMS-TM-NOP
Room 4007-S, Ag Stop 0275
P.O. Box 96456
Washington, DC 20090-6456

February 20, 1998

Re: Proposed Organic Rule, Docket # TMD-94-00-2

Dear National Organic Program Staff:

As a long-time member of the "organic community" and as a concerned consumer who cares about the quality and standards of organic produce, dairy and meats, I have kept abreast of the development of the National Organic Program's proposed rules and your request for comments. Please revise your proposed rules on organic food production to fully reflect the advice and expertise of the National Organic Standards Board. The board went to historic lengths to create an open and inclusive process that involved thousands of citizens, including those who are most informed about, and most affected by, this issue.

In particular, I urge you to give us a meaningful choice about how our food is produced and to maintain the integrity of organic agriculture in the final rules by prohibiting all of the following products and practices for food labeled and/or sold as certified organic:

- Genetically engineered organisms and materials
- Municipal sludge ("biosolids," section 205.22)
- Irradiation ("ionizing radiation")
- All inert ingredients unless they are rated by the EPA as "Generally Recognized As Safe" (Section 205.21(d))
- "Certified facilities" allowing for the perpetual and intensive confinement of livestock.

The proposed standards would greatly diminish international demand for organic foods produced in the U.S. since they fall so low; new national standards must at least meet the prevailing standard for organic food. **People concerned about the potential risks of eating foods which are transgenic, irradiated or grown with "biosolids" would be likely to avoid anything bearing the USDA "organic" seal, both here and abroad.**

I am also concerned that the fee structure is not equitable for the great range of small and large-scale farmers that the proposed standards impact. Additionally, national standards should be regarded as a minimum standard; independent certification agencies must be permitted to certify to standards which exceed the national standard.

I would also like to point out that the proposed rules are in violation of the Organic Foods Production Act of 1990, which specifically gave the National Organic Standards Board the sole power over what materials may be used by certified-organic operations. It is my understanding that, while the USDA may remove substances from the National List (of allowable materials), the USDA may not add to the list unapproved substances!

Please revise the proposed program to reflect my concerns and to keep meaning in the words "certified organic."

Sincerely,

(Signature)

Print full name:

Address1:

Address2:

City, State, zip:

Cc: