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Comments submitted on the Organic Proposed Rule, 7CFR Part 205
Docket Number: TMD-94-00-2

Topic: General

The use of genetically engineered organisms (GEOs) and any materials/products produced from GEOs should be clearly prohibited in every aspect of production, handling and processing of organic products. The prohibition of GEOs is necessary for the proposed rule to assure consumers' freedom of choice, to be consistent with Organic Foods Production Act of 1990 (OFPA), and to prevent health risks of consumers of American organic products.

The National Organic Standards Board defined GEOs as "Made with techniques that alter the molecular or cell biology of an organism by means that are not possible under natural conditions or processes. Genetic engineering includes recombinant DNA, cell fusion, micro- and macro-encapsulation, gene deletion and doubling, introducing a foreign gene, and changing the positions of genes. It shall not include breeding, conjugation, fermentation, hybridization, in-vitro fertilization and tissue culture."(September, 1996)

Based on that definition, consumers of organic products made in the US, including Japanese consumers, never expect GEOs to be labeled as organic. None of current organic standards, including the Codex guidelines (draft), allows the use of GEOs and their products. By choosing organic products, then, consumers have had freedom of choice to buy products free from GEOs. If the National Organic Program (NOP) is to provide freedom of choice what to eat for consumers, it should prohibit GEOs.