

Ms. Eileen Stommes
USDA, National Organic Standards
USDA, AMS, Room 4007-5
AgStop 0275, Post Office Box 96456
Washington, DC 20090-6456
FAX: (202) 690-4632

Dear Ms. Stommes,

I am most concerned about the USDA's proposed national organic standards, especially USDA allowing practices that violate the spirit of organic farming and ignore years of effort by the organic industry.

I've always been able to trust the purity of products carrying a certified organic label. If the USDA doesn't agree to rewrite these proposed standards, I will lose my access to and right to choose food products grown by true organic methods.

The Organic Foods Production Act of 1990 (OFPA) directed USDA to develop rules providing national uniformity in organic standards. This Act established the National Organic Standards Board (NOSB), composed of 15 representatives from the natural foods community, to make recommendations to USDA. USDA's recently released proposed standards represent a *serious departure from the NOSB recommendations* --and from the essential principles of organic farming.

Many aspects of USDA's proposed standards have no place being under the organic label. The following are the very worst of the practices, those posing the greatest threat to the integrity of organic farming and its products:

1. Irradiation in the handling of organic foods. NOSB gave a specific recommendation AGAINST the use of irradiation in organics. Irradiation exposes foods to radioactive materials in order to kill bacteria; it's long-term effects are still unknown. (ionizing radiation; comment topic heading: Handling/Nat'l List; 62 Federal Register, pg 65884, sect. 205.17)
2. Genetic engineering in organic products. NOSB specifically recommended prohibiting genetic engineering in organics, i.e., taking DNA from one organism (incl. bacteria, viruses, animals, and plants) and inserting it into another -- a potentially dangerous process, with possible detrimental effects on the environment, food safety, and the health of humans, animals, and plants. (genetically engineered organisms; comment topic heading: General/Crops/Handling/Nat'l List; 62 Federal Register, pg. 65875, sects. 205.8 & 205.2(56))
3. Municipal sewage sludge for use in growing organic products. Included despite NOSB's statement that sludge was "unacceptable for use in organic crop production." Municipal sludge may be contaminated by toxins absorbable by crops. (municipal sludge; comment topic heading: Crops/Handling/Nat'l List; 62 Fed'l.Re., pgs. 65892-65893, sect. 205.8 & 205.22)
4. Antibiotic use on livestock. NOSB recommended specific parameters for use of antibiotics in livestock raised organically, and a total prohibition of antibiotic use on livestock raised for slaughter. The USDA's guidelines are much looser. (antibiotic use; comment topic heading: Livestock; 62 Federal Register, pg. 65880, sect. 205.14 (b)(1) & (2) & 205.14(d))
5. Animal feed for organically raised livestock. NOSB recommended all organically produced livestock be fed 100% certified organically produced feeds and supplements. The proposed standards allow them to be fed up to 20% non-organic feed yearly. (animal feed; comment topic heading: Livestock; 62 Fed'l. Register, pg. 65878, sect. 205.13 (a)(1)(1))
6. Historic land usage practices. Current organic standards require considering a complete land history before organic certification. OFPA says farms should be free from using toxic chemicals and other prohibited substances for only 3 years to be certified organic; but often excessive soil contamination disallows organic use even after 3 years. With this 3-year rule, contaminated lands, like Superfund sites, could be certified organic. USDA's proposed "unavoidable contamination level" for certifying land ready for organic farming is unacceptable. (historic land usage practices; comment topic heading: General; 62 Federal Register, pgs. 65866-65867 & 65932, no sect. no.)

I also object to the following:

- allowing the use of parasiticides and hormones on dairy livestock.
- the great increase in fees on organic farmers, virtually forcing the small organic farmer out of business.
- the prohibition of any group of organic farmers holding themselves to higher standards than the proposed regulations. This clause alone ends the consumer's right to choose.

These practices cannot be allowed to be included under the organic label. USDA must **totally rewrite** the proposed organic standards taking into account NOSB recommendations and traditional methods of organic farming.

Thank you considering my concerns on this very serious issue.

Sincerely,