

Eileen S. Stommes, Deputy Administrator,  
USDA-AMS-TM-NOP, Room4007-So., Ag Stop 0275,  
P.O. Box 96456,  
Washington, DC 20090-6456.  
[Docket Number: TMD-94-00-2]  
RIN: 0581-AA40  
National Organic Program

Dear Eileen S. Stommes,

My concerns are too numerous to list, but most would be addressed by a rule which accurately reflects the recommendations of the National Organic Standards Board recommendations. USDA should adhere to the NOSB Proposed National List Allowed and Prohibited Substances and refrain from changing it.

I have listed a few major and serious departures from NOSB recommendations.

The list is not inclusive.

USDA should use NOSB's broad definition of genetic engineered foods. The NOSB and I believe organic farmers should not use genetic engineering to produce foods.

I oppose the USDA proposal to approve GE foods on a case-by-case basis. USDA fails to seek comment on whether GEO's and their resulting products should be considered "synthetic." (Comment Topic Heading: General/Crops/Handling/National List).

USDA should support the NOSB's Prohibition on the Use of Ionizing Radiation (Irradiation). (Comment Topic Heading: Handling/National List)S 205.17.

USDA should follow the NOSB recommendation to prohibit the use of synthetic inerts contained in EPA List 1- "Inerts of Toxicological Concern," EPA List 2 - "Potentially Toxic Inerts," and EPA List 3 - "Potentially Toxic Inerts" instead of permitting those on lists 2 and 3.

Environmentally contaminated land must not be used for organic food production. 62 (Federal Register 65866-65867 and 65932).

Organic farmers must not be permitted to spread potentially toxic sewage sludge and industrial wastes on farm lands and pastures. (Comment Topic Heading: Crops/Handling/National List).

States should be allowed to impose organic standards stricter than the USDA standards, without permission from the US Secretary of Agriculture. Moreover, the state must be allowed to permit organic growers to label their products grown in the state.

Per NOSB recommendation, USDA should prohibit substances extracted with a Synthetic Volatile Solvents in organic products.

The USDA should not restrict truthful labeling of any kind. Consumers