

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

usda.gov/nop

Docket #TMD-94-00-2

1998

Dear Ms. Stommes,

I am opposed to the USDA's national organic standards as presented. The USDA was charged by Congress with "codifying" an existing style of agriculture, not with modifying it.

"Let organic be organic." "Organic" is a holistic approach to diet, ecology, and the environment which is natural from start to finish. However, organic as defined in the proposed standards misses key organic concepts, such as its holistic approach, the health of the agro-ecosystem, and biodiversity on the farm.

We urge the USDA to follow closely the strong consensus delivered to you by the National Organic Standards Board:

1) No use of genetic engineering or irradiation, either directly or indirectly in foods, including, but not limited to, both agricultural and non-agricultural ingredients, processing agents, flavorings, colorings, additives, enzymes, etc., livestock feed, fertilizers, herbicides, fungicides, pesticides, parasiticides, and all other agricultural inputs. This includes nutritional enrichments, incidental or supplemental additives, inputs, etc. This prohibition should include the currently allowable 5% non-organic ingredients of processed foods labeled organic.

These new technologies have never been a part of organic agriculture or handling. Just say no!

- 2) No use of municipal sewage sludge (including on crops used for livestock feed).
- 3) No use of animal protein, bone meal, etc., in feeds given to herbivorous livestock.
- 4) No, or severely restricted, use of antibiotics, in keeping with NOSB's recommendations, which are already quite liberal.
- 5) No intensive livestock confinement.
- 6) Greater restriction on use of synthetic inputs, in keeping with NOSB's recommendations.
- 7) Fees charged to organic farmers and certification agencies should follow a sliding scale realistically reflecting their abilities to pay.
- 8) No administrative or economic pressures should be brought to bear against the existing farms, handlers, and certification agencies which have built the organic tradition.
- 9) State, local, regional, and private certification boards should be permitted to apply stricter standards than the USDA's.
- 10) Better guarantees of NOSB's strictly "organic composition," independence and autonomy, and freedom from political and/or special interest pressure from outside the organic sector.

Government agencies tread on dangerous ground when they dilute the identity and the integrity of organic, denying the only remaining choice of truly natural, unadulterated food to people who want it. Such dictation of food choices denies our natural rights to life, liberty, and property.

Sincerely yours,

Address: