

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

RE: Docket number TMD-94-00-2
Topic: General/Crops/Livestock/Handling/Labeling/National List

Dear Ms. Stommes:

I am writing to request that the recommendations passed by the National Organic Standards Board (NOSB) be respected by the USDA, excluding all uses of genetically engineered organisms (GEOs) in organic production.

This includes changing the narrow Proposed Rule definition of "genetic engineering" (General, sec. 205.2) to be in accordance with NOSB recommendations. It also includes a comprehensive ban on GEOs in seeds, seedlings, and planting stock (Crops, sec. 205.8); livestock feed (Livestock, sec. 205.13); livestock health care (Livestock, sec. 205.14); production (National List, sec. 205.22); processing (Handling, sec. 205.17, National List, sec. 205.26); and pest management (National List, sec. 205.9). I also oppose the USDA's ban on the use of stricter standards and "eco-labeling" for those products that exceed USDA requirements (Labeling, sec. 205.103).

GEOs should be uniformly banned from organic production due to the irreversible harm they may have on our environment, including the development of insect resistance to both natural and synthetic pesticides; the transfer and spread of altered genes due to pollination and cross-breeding; and the development of herbicide resistance by weeds and wild relatives of crop plants. Furthermore, contaminating organic with GEOs would effectively close off European and other export markets that currently prohibit GEOs from organic; this would have a serious detrimental impact on the American organic industry. Finally, as a consumer I have the right to purchase products not produced with genetic engineering; organic is currently the only option I have in the US to avoid these manipulated products.

The Proposed Rule judges the inclusion of GEOs on a performance standard based on end results, not on the actual process of genetic manipulation. Organic production is, by nature, a process-based approach. This process supports agriculture that is safe and sustainable, one that is incompatible with GEOs.

Due to the serious problems in the Proposed Rule regarding GEOs, and the shift from a process-based approach to a performance standard, I request that the current Proposed Rule be withdrawn and rewritten to accurately reflect NOSB recommendations, as stipulated in the Organic Foods Production Act.

Sincerely,