

April 20, 1998

Eileen Stommes
Deputy Administrator, USDA- AMS-TM-NOP
Room 007 - South Building, AgStop 0275
P.O. Box 96456
Washington, D.C. 20090-6456

RE: Docket # TMD - 94 - 00 - 2

Dear Ms. Stommes:

As a health conscious, responsible, and concerned United States citizen, I want to express my concerns regarding the proposed USDA National Organic Program for Organic Standards. I ask you to re-write the rule to adhere to the National Organic Standards Board (NOSB) National List recommendations and NOSB's definitions and authority; and to the original intent of the 1990 Organic Food Production Act (OFPA).

Your new proposed rules would take away my freedom to choose health. The existing requirements and principles of NOSB and OFPA insure that I can get the real source of health: fresh, organic fruits, vegetables, grains, and herbs. If you change the requirements of the Organic Food Production Act and the principles that organic farmers already use, I lose not only my choice, but my health.

I oppose the USDA National Organic Program Proposed Rule for Organic Standards as summarized below:

1. I oppose Sections 205.20-205.28 National List. I want USDA to write the rule according to NOSB recommendations, use NOSB definitions, and recognize the NOSB's authority.
2. I oppose Sections 205.2, 205.8, 205.9, 205.17, 205.22, 205.26 National List: Materials included in organic production. Genetically engineered organisms (GEOs) and their products are synthetic prohibited materials and are unacceptable for productions. (Section 205.8) Bio-pesticides from killed GEO bacteria should not be accepted on the National List (Section 205.22(d)). GEO-derived enzymes should not be accepted for organic food processing. (Section 205.26)
3. I oppose food irradiation because it chemically changes the food, destroying some nutrients and creating some xenobiotic substances of unknown toxicity. Food irradiation should be specifically prohibited under Section 205.17, Processing practices.