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RE: Docket #TMD-94-00-2

As a consumer of organic foods, I am concerned about the Proposed National Organic Standards. The standards as written are not representative of the high standards that exist in the organic industry. They are far from the original recommendations of the National Organic Standard's Board and the intent of the Organic Foods Production Act of 1990.

In particular, I strongly object to the inclusion of irradiation (205.17), genetic engineering (205.22, 205.26), the use of municipal sludge (205.7, 205.22) and the livestock standards under Subpart B.

- Irradiation is a synthetic process whose long-term effects are still unknown. It cannot be considered a cure-all to food safety concerns.
- Genetic Engineering (GE) is not consistent with the basic principles of organic farming and is not permitted internationally in organic production. GE has the potential to lead to disease/bug/chemical resistant organisms. There are too many uncertainties regarding the long-term impact of GE on the environment and human health.
- Sewage sludge from municipal waste may contain heavy metals and toxins and is not appropriate for use on land where food is to be grown for human consumption. The use of sludge has never been allowed in organic production and is completely unnecessary.
- The livestock standards are weak and contain many loopholes. Organic producers expect the use of 100% organic feed except for emergency provisions. I am strongly opposed to the use of "reprocessed proteins" or other animal byproducts in animal feed as well as the use of antibiotics or hormones. Preventative health in terms of proper housing, hygiene and humane management of animals should be expected of producers of organic animal products.

I urge you to consider the opinions of consumers like myself in writing and implementing any legislation regulating the organic industry meant to protect our health and our environment. Thank you.

Sincerely,