

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

Regarding: The USDA'S proposed rules on "Organic".

Dear Ms. Stommes,

The concern of current organic farmers is that they have established a stellar reputation for the term Organic in the Marketplace. They have tremendous customer loyalty that they do not want to see devalued. They have set extra high standards demonstratively higher than the proposed rules, which will put them at a competitive disadvantage. The law enables factory farming and allows corporations to cash in on the good name established for Organic. The USDA estimates that the average yearly fee for certifiers will be around \$3,500, but their costs could add thousands more to the process. These costs will ultimately drive small farmers out of business.

There are some additional areas of concern. First is allowing technology that has historically been unacceptable to producers and consumers. Technologies such as GMO's (Genetically Modified Organisms) and irradiation for which there is no support within our industry.

Second, currently prohibited inputs or methods in organics that would be allowed are unacceptable. This concerns toxic sludge and use of rendered animal parts in feed. This area concerns allowing many chemical inputs that all certification agencies currently do not allow. A list of 20 to 30 methods and products is being compiled that the USDA would allow that have never been allowed in organics and still shouldn't be.

There is a concern also with the potential prohibition of stating on your label that your organic product has higher standards than those of the USDA. If, in the worst case, the regulations would allow GMO's and chemicals etc., some producers want to have a higher standard and say what that is on the label. This should be a first amendment right.

There are very few industries where customers are so romantically attached to their products as in the Natural Foods industry and particularly, the organic foods area. Today, there is a perceived standard for certified organic food and there is a high level of integrity. We want the USDA to set even higher standards and enforceable uniformity. We don't want to lower the current standards because corporate agribusiness would love to take the word "Organic" because of its high value. We have a commitment to the family farm model.

Sincerely,

Address:

Date: