

Eileen Stommes, Deputy Administrator
USDA - National Organic Standards
USDA, AMS, Room 4007 - S,
AgStop 0275 P.O. Box 96456
Washington, DC 20090-6456

Dear Ms. Stommes

I am writing to express my dismay at the proposed National Organic Standards. The proposed standards are not consistent with the existing standards and practices in use today by organic certifiers. Were these standards to become law, the term "organic" would not mean what consumers today expect it to mean. The proposed regulations lower the standards and allow for many practices which are inconsistent with true organic farming. These are some of the biggest problems with the standards as they are proposed:

Missing the "Big Picture" by eliminating key concepts

The definition of 'organic' in the proposed standards lacks the holistic approach central to true organic practices. The proposed rules take an approach that eliminates key concepts such as the health of the agro-ecosystem and biodiversity on the farm.

Ignoring the recommendations of the Nation Organic Standards Board

The USDA has ignored the clearly mandated authority of the NOSB was given in the Organic Foods Production Act of 1990 to recommend the National List of Materials for organic practices.

Possible inclusion of genetically engineered organisms (GEOs) in organic systems: Section 205.22

The use of GEOs is an unproven technology that the organic system does not need in order to grow high quality and nutritious food. There is not enough scientific data documenting the long term impact GEOs will have on the environment or human health. Use of GEOs is inconsistent with traditional organic farming goals and practices.

Possible inclusion of biosolids (sewage sludge) in organic farm practices: Section 205.22

Sewage sludge from municipalities' waste may contain heavy metals and toxins and, therefore, 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 food production and is unnecessary and contrary to the basic intent of organic farming practices.

Weak livestock section: Sections 205.14, and 205.13

The livestock section is weak as currently written, and gives too much leeway in the amount of non-organic livestock feed, types of living conditions and use of antibiotics and other animal drugs allowed in organic production. The organic industry expects the regulations to include the use of only 100% organic feed, and consumers expect absolutely no antibiotics in organic meat and dairy production.

Unnecessary loopholes

Loopholes were created when the USDA eliminated the carefully worded restrictions on the use of materials common to the current organic standards, replacing them with the new terms such as "active" and "non-active" synthetics and ingredients. There is no historic or legal reason to create new terms. These loopholes will allow synthetic materials and ingredients in organic production that have never been allowed before.

Weakened de-certification authority: Section 205.219

The de-certification authority as defined in the proposed regulations is inefficient and therefore products not meeting the organic requirements may remain on market shelves longer. Enforcement of certification standards, currently placed in the hands of private certifiers, may be weakened through what will inevitably be a lengthy bureaucratic process.

Ignoring historical land usage practices: Section 205.2

The USDA Proposed Rule does not include previous history of the land as a part of the requirements of the Farm Plan submitted to a certification agent. The USDA's proposed concept of "unavoidable contamination level" of each farm is not acceptable to consumers.

The fee structure threatens farmers, certifiers, handlers, processors and consumers: Sections 205.421 and 205.42

The proposed regulations specify the same fee for certification regardless of the size of the business. This threatens the ability of small farmers, processors, and handlers to attain certification and therefore threatens the consumer by undermining the quality and quantity of available organic product. In addition, the proposed program charges all certifiers the same fees, which would virtually eliminate independent certifiers, create a shortage of certifiers in some geographic regions, and generally give economic advantages to large agro-corporations over small, locally and family owned and supported agro-businesses.

Because of the gross inadequacies of the proposed standards, I ask that the National Organic Program (docket TMD-94-00-2) be withdrawn. I ask that the USDA write a new set of rules in consultation with the National Organic Standards Board, the Organic Trade Association, organic certifiers such as the OCIA, NOFA, and other knowledgeable and experienced experts from the organic foods industry.

Sincerely,