

April 18, 1998

Dear USDA,

I am writing in reference to **Docket #TMD-94-00-2**, the proposed organic regulations implementing the Organic Foods Act of 1990. I am a concerned consumer of organic produce. The proposed standards are substantially lower than those recommended by the National Organic Standards Board (NOSB). There are many aspects of the proposed standards which must be altered before issuing final regulations. Please rewrite the standards according to NOSB recommendations and recognize the NOSB's authority. [Section 205.200-205.28]

Organic Produce - The use of broad categories of materials prohibited by NOSB are allowable according to the USDA proposed regulations, including: raw manure, strychnine, sodium nitrate, piperonyl butoxide, many toxic synthetic substances, genetically engineered organisms, sewage sludge and ionizing radiation. The use of these materials is unacceptable for food production. [Section 205.2, 205.8, 205.9, 205.22, 205.26, 205.17]

Livestock Animals - Please adhere to NOSB recommendations regarding the care and use of livestock animals. I am NOT in support of the use of non-organic feed, confinement operations and liberal drug use. Animals raised in such conditions should not be labeled "organic". [Section 205.13 - 205.15]

Small Farms and Small Scale Certifiers - The USDA proposed regressive flat fee for certification and registration means that smaller scale farmers, certifiers and processors will pay a disproportionate share. Please alter the regulations to include a sliding scale fee system to reduce the impact on small operators. [Section 205.421 - 205.425]

"Green" Label Regulations - The proposed restrictions on "green" labels inhibits consumers right to knowledge of a product. Labels such as: pesticide-free, no antibiotics or hormones, ecologically produced, humanely raised, IPM grown, etc. should be acceptable. Additionally, the CCOF seal would be required to be on a back, less prominent label -- why? The USDA should stick with organic, as the law requires rather than restrict other labeling terms. [Section 205.103]

As a consumer, I should be able to trust that the USDA will protect my right to be informed rather than inhibit it. The proposed organic regulations not only loosen current standards for organic products, but also water down the term "organic" to the extent that I would no longer be assured of a high quality and healthy product. Please rewrite the standard in accordance with NOSB recommendations in order to protect and serve the public rather than big business.

Sincerely,