

Eileen Stommes, Deputy Administrator
U.S. Dept. of Agriculture, AMS-TM-NOP,
Room 4007-S, AqStop 0275
P.O. Box 96456, Washington, D.C. 20090-8546

Re: Docket No. TMD-94-00-2

Date:

To Whom It Concerns:

As a citizen and consumer of organic foods and as someone who is very concerned about the quality and choices in the foods I and my family purchase and eat, I feel that the recently proposed regulations for organic foods must be rewritten to reflect much stricter standards. As currently proposed, these standards are unacceptable.

I strongly believe that the USDA should defer to the expertise, integrity and authority of the National Organic Standards Board (NOSB) and should adhere to all of their recommendations as was mandated by Congress in the Organic Foods Production Act of 1990. Their authority, including the power to de-certify growers who do not meet their standards, should not be usurped. (Sections 205.20 - 205.26)

The proposed regulations would allow for practices and technologies that are completely at odds with the very nature of organic agriculture, such as the use of genetically engineered organisms (GEOs), the inclusion of synthetics prohibited by the NOSB, and the use of ionizing radiation in food production. The use of bio-solids should be prohibited in ANY agriculture, but particularly in organic farming. This practice threatens not only human health, but that of entire ecosystems. (Sections 205.2, 205.7-205.9, 205.17, 205.22, 205.26)

The standards of care for farm animals should also not be any less than those set forth by the NOSB and the feeding of manure, rendered animal parts, non-organic feeds and the use of antibiotics given to animals on organic farms should be prohibited. (205.13-205.15, 205.22, 205.24)

There should be a sliding scale of fees and not a standard flat fee for certification which will give an unfair advantage to large operators and could force many small growers and other small-scale companies out of existence, giving the consumer less choice. (205.421-205.424)

Consumers deserve to be given as much information as possible in terms of how their food was grown and processed and we are entitled to full market information and disclosure on labels. The USDA should not interfere with such labeling and doing so would violate our right to make fully informed choices. (205.103)

The full historical record of land usage should be taken into account and no previously contaminated sites should be allowed for use in organic agriculture.

To go against the intent of the Organic Foods Production Act as defined by Congress and to depart from the recommendations of the National Organic Standards Board as mandated by that law would muddy the meaning of "organic", confuse customers, hurt small farmers and businesses, and would devastate a vital and growing enterprise. It would also harm ecosystems, soil and water health and species biodiversity. This will affect not only present, but future generations.

Sincerely,

Name: 

Address: