

Ms Eileen S. Stommes, Deputy Administrator
USDA-AMS-TM-NOP
Room 4007-S Agstop 0275
PO Box 96456
Washington DC 20090-6456

Dear Ms Stommes:

RE: Docket number TMD-94-00-2 on USDA's proposed rules on the national organic certification standards.

The proposed rule has no restrictions on the the inclusion of **genetically engineered organisms** in organic foods. There has been little or no testing required on the potential human health hazards of gene-altered foods. In spite of this lack of regulation, several studies have shown that dangerous allergens and toxins can be spread through bioengineered foods. Other studies have shown that antibiotic resistance genes, commonly found in gene-altered food, can make animals and humans more susceptible to dangerous antibiotic resistant bacteria. Long term consequences to the ecology are also unknown and could negatively effect the viability of the food supply as well as the organic farmer. **The class of genetically engineered organisms and their derivatives should be prohibited in production of organic foods.**

Ionizing radiation is not compatible with a system of organic farming and handling. Despite proponents' claim that ionizing radiation kills dangerous pathogens, not all pathogens would be destroyed. Long term potential human health hazards of ionizing radiation on food are not fully known; yet some studies have shown that food which has undergone irradiation has a changed nutritional content. **Food that has ionizing radiation should not be labeled organic.**

The proposed rule has no restriction on the use of **municipal sludge** as a fertilizer for the production of organic foods. Municipal sludge often contains toxic accumulative chemicals that get passed through the food chain. Examples are organochlorine pesticides, dioxins, furans, PCB's, and heavy metals. Numerous studies are linking exposure to these chemicals with ill effects on human endocrine, neurological and immune systems. **The use of municipal sludge as a fertilizer for the production of organic food must be prohibited.**

Most Sincerely,