

Docket TMD-94-00-2
Eileen S. Stommes, Deputy Administrator
USDA-AMS-TM-NOP
Room 4007 South
Ag Stop 0275
POBox 96456
Washington, D.C. 20090-6456

Dear Ms. Stommes:

I am writing regarding the USDA's proposed National Organic Rule, released for public comment on December 16, 1997. As a consumer, I find that the rule undermines the meaning of organic, and believe that if the rule is passed the way it stands the concept of "organic" will be changed forever. I have several objections to the proposed rule:

- 1) Problem: The rule ignored the National Organic Standards Board recommendations, resulting in weaker organic certification requirements. The USDA should conform to the recommendations of the National Organic Standards Board. (Sections 205.20-205.28)
- 2) Problem: The USDA standards prohibit use of "green labels" in the name of protecting consumers. The standards were only supposed to address organic labels. USDA should leave other "green" labeling alone. (Section 205.103)
- 3) Problem: The standards implement a fee structure for certification which is regressive and excessive. The flat fee would put small farmers out of business, as well as small scale producers and certifiers. A sliding fee system would reduce the impact on small operations. (Sections 205.241-205.424)
4. Problem: The standards allow for the use of materials which current organic growers and processors strongly oppose. The USDA would allow the use of sewage sludge, irradiation, and genetically engineered organisms in the processing of organic foods. The rule should prohibit the use of sewage sludge (biosolids), food irradiation ('ionizing radiation'), and genetically engineered organisms. (Section 205.2, 205.7-205.9, 205.22, 205.26, 205.17)

Signature: _____

Name (print): _____

Address: _____

Date: _____