

MAR 24 @ 11:00

USDA - National Organic Standards
Docket #TMD-94-00-2
AgStop 0275
P.O. Box 96456
Washington, DC 20090-6456

Please accept the following comments on the proposed National Organic Standards and enter them into the official record.

I strongly believe that the proposed rule is not compatible or consistent with long established organic principles!

I respectfully request that the USDA withdraw the proposed rule when the comment period has ended, and all comments have been received, resubmit the proposed rule based on the recommendations of the National Organic Standards Board (NOSB) and the comments submitted from the organic community. All comments on the first proposed rule should remain part of the record for the entire rulemaking process. Organic farming, trade and consumer groups have identified as many as 90 points where the proposed rules or USDA request for comments deviates from the high standards that reputable certifying agencies and states have established. I have the following specific comments on the proposed rule.

ORGANIC FOODS MUST:

1. Use as one of the criteria in selection of organic materials and methods the preferences and demands of the organic consumer.
2. Rely on private certification to minimize USDA intervention and cost.
3. Allow private certification organizations to have a higher standard like the state certification programs have.
4. Not price the small private certifiers and farmers out of organic foods industry.
5. Uphold the legal authority of NOSB to review and recommend all materials for inclusion on the National list. This is a crucial element to provide a check and balance on the USDA.
6. Not allow the feeding of non-organic feed to livestock except in valid, temporary emergency situations.
7. Require livestock to have appropriate access to fresh air and the outdoors.
8. Prohibit antibiotics and hormones in organic livestock production.
9. Prohibit the feeding of animal and poultry by-products.
10. Follow the recommendations of the NOSB advisory board, which reflects the organic community.
11. Prohibit and never allow the use of genetically engineered organisms, irradiation and sewage sludge.

Organic Food is a partnership between the consumer and the farmer. It is not just an environmental label, but a label representing this unique partnership, the consumers preferences must be respected.

(Additional comments below, and/or on attached sheet)

This is just a sample of my objections. Please review comments from the Coulee Region Organic Produce Pool (CROPP / Organic Valley), The Organic Crop Improvement Association (OCIA), the Organic Trade Association (OTA), the Organic Farmers Marketing Assoc., (OFMA), National Campaign for Sustainable Agriculture, Independent Organic Inspectors Association (IOIA), Organic Materials Research Institute (OMRI). I support their additional objections

Sincerely,

Name/Business: _____

Address: _____

City: _____

State: _____

Zip: _____

Consumer/Farmer/Retailer/Other? _____