

Re: USDA's Proposed Rules for the Implementation of the Organic Foods Production Act

Dear ,

We would like to express our deepest reservations on the proposed USDA rules for the Implementation of the Organic Foods Production Act as we are gravely concerned about their impact on the quality of "organic" products imported into Ireland from the US. We are also concerned about the future impact of these rules on European organic standards. Our comments on the proposed rules are as follows:

General: We disagree with the current proposed rules and call for the preparation of a new set of rules which conform with the recommendations set down by the National Organic Standards Board ("NOSB"). We request that the rule be reframed strictly as a process standard rather than performance standard. We also request that the statutory authority of the NOSB be fully maintained.

National List: We oppose all changes suggested by USDA to the National List. We specifically oppose the following proposed changes:

Proposed Rule 205.20;62 Federal Register 65889 and Proposed Rule 205.22.(d);62 Federal Register 65891: we do not agree that toxins derived from genetically engineered bacteria be placed on the National List of Active Synthetic Substances Allowed in order that the agency may decide whether they may be "*allowed, prohibited or allowed on a case-by-case basis*". In particular, we are totally opposed to the classification of "Killed B.t." as an allowed active synthetic.

Proposed Rule 205.22(c)(9); 62 Federal Register 65891: we do not agree with the proposed inclusion of Piperonyl Butoxide on the National List of Active Synthetic Substances Allowed.

Proposed Rule 205.26; 62 Federal Register 65895: we do not agree that chymosin be placed on the National List of Non-Agricultural Substances Allowed "*so as to solicit public comment*". Instead, we agree with the recommendation of NOSB that genetically engineered chymosin be listed as an unacceptable synthetic.

General/Crops/Handling/National List: Proposed Rule: 205.8: we support the prohibition called by NOSB on the use of genetic engineering in organic foods in the strongest possible terms. We find it intolerable that organic standards should even contemplate including such unnatural items. We specifically call on genetically engineered organisms and their resulting products to be regarded as 'synthetic'.

Proposed Rule: 205.2(56): we disagree with the proposed USDA definition of genetic engineering and instead support NOSB's broad definition.

Proposed Rule: 205.22; 62 Federal Register 65892-65893: we agree with NOSB's findings that "sewage sludge" is "synthetic" and totally "unacceptable for use in organic crop production".

Handling/National List: Proposed Rule: 205.17; 62 Federal Register 65884: we agree with NOSB's recommendations that ionising radiation (irradiation) should not be used in the handling of organic food. Again, we find the concept of allowing irradiation of organic foods totally incomprehensible. Needless to say, we do not regard irradiation as "essential standard industry practice" or "good Manufacturing practice".