
March 26th, 1998

Eileen S. Stommes
Deputy Administrator USDA-AMS-TM-NOP, Room 407-S
Ag Stop 0275, P.O. Box 96456
Washington, DC 20090-6456

Dear Ms. Stommes,

I write in reference to the USDA's proposed rule on organic foods (docket #TMD-94-00-2). I am concerned that the rule is much weaker than current state rules for certifying foods as "organic." The "USDA Approved Organic" designation will not ensure that foods are free of toxic pesticides and fertilizers that can be harmful to human health and the environment, which is what I expect from organic foods.

In particular, I am concerned that the rule allows the use of sewage sludge as fertilizer in organic farming (Section 205.7). Experts have identified more than 60,000 toxic compounds in sewage sludge, making it unacceptable for the purposes of organic farming.

True organic farming applies to livestock as well as to plants. The USDA rule would allow livestock to be fed 80% organic feed, rather than 100%. It also allows liberal drug use in managing livestock (Sections 205.13 to 205.15 and Sections 205.22 and 205.24).

Finally, the USDA rule will not allow differences in labeling organic foods. As I understand it, I would no longer see a label on naturally raised chicken stating "no drugs or hormones used" in the raising of this product (Section 205.103). That distinction is important to me.

Organic farming, processing, and handling put into practice a respect for the environment and produce healthier food for consumers. As a result, the organic movement is a growing \$3.5 billion per year industry. The USDA organic designation may make the industry grow even faster, but at the expense of some of its vital health and environmental principles. Please revise the rule accordingly.

Sincerely,

Lois B. Henley