Eileen S. Stommes, Deputy Administrator
USDA-AMS-TM-NOP, Room 4007-So.
Ag Stop 0275
P.O. Box 96456
Washington, DC 20090-6456

RE: Docket Number TMD-94-00-2

Dear Ms. Stommes:

I am writing to express deep concern over several issues raised in the National Organic Program's proposed rule as published in the Federal Register of December 16, 1997.

First, I request that the NOSB's recommendations to the USDA be restored to the rules in all areas, but especially regarding the National List (sections 205.22 through 205.26) and the system of "approved, regulated, and prohibited" regarding materials. Also regarding the National List, please do not allow sludge ("biosolids"), genetically engineered organisms, or irradiation on organic food.

I would also ask that all inert ingredients should be on the EPA's "Generally Recognized as Safe" list, or prohibited from use in processing or producing organic food (section 205.21(d)).

Regarding farmers, the proposed certification fees will be a hardship for farmers and small certification agencies, both in terms of economics and paperwork (Page 65930-931). Also, farms certified currently under agencies that become accredited should be allowed to continue to be certified, even if the agencies standards are modified by the national organic program. Any other situation would be a punishment for farms that have already gone through the certification process.

Regarding livestock confinement (section 205.15(a)5b), feeding (section 205.13), and origin (section 205.12), please follow the NOSB's recommendations, and also define what constitutes an emergency regarding feeding of non-organic feed.

Sincerely,