NATIONAL CAMPAIGN FOR SUSTAINABLE AGRICULTURE

Organic Committee

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March 3, 2004

The National Organic Standards Board
c/o Keith Jones
Room 4008 - South Building
1400 and Independence Avenue, SW
Washington, D.C. 20250-0001

Dear NOSB members:

Thank you for the opportunity to comment on the NOSB's draft "Compatibility with Organic Production and Handling." The National Campaign Organic Committee finds the January 30, 2004 draft to adequately reflect criteria for evaluating substances to determine if they are compatible with a system of sustainable agriculture and consistent with organic production and handling.

We strongly endorse inclusion of the following items g), k), and l):

"g) Is there evidence that the substance is mined, manufactured, or produced through reliance on child labor or violations of applicable national labor regulations?
k) Is there adequate information about the substance to make a reasonable determination on the substance's compliance with each of the other applicable criteria? If adequate information has not been provided, does an abundance of caution warrant rejection on the substance? and l) Does use of the substance have a positive impact on biodiversity?"

We do not support inclusion of item "m) Does the substance facilitate the development of new organic products?"

Item m) would be extremely difficult to quantify. For example what factors would be used to determine if the use of a petitioned substance would facilitate the development of new organic products? How much "development" would be needed to determine if a substance would make an adequate contribution?

We find that Item m) has nothing to do with compatibility with a system of sustainable agriculture and consistency with organic production and handling.

We urge that Item m) be deleted, and all other items remain as proposed in the January 30, 2004 draft.

Respectfully submitted,

National Campaign for Sustainable Agriculture Organic Committee
Liana Hoodes, staff