SIMON FARMS INC.
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ORGANIC PROGRAM

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National Organics Standards Board
% ARTHUR NEAL
Room 408 - South Bldg.
1400 4 Independence Ave SW
Washington DC 20250-0001

Dear Mr. Neal;

There is certain parts of the "NOSB Guidance for interpretation of Section 205.239 of the NOP that was published for comment that is of concern to me. Our farm has raised organic hay to supply to dairies here in Idaho for the last seven years. It is of huge importance to our financial situation that we can continue to sell.

We hold to very high standards in our effort to produce organic. The inspection and record keeping has been very extensive. This high quality feed goes to dairies that may find it very difficult to comply specifically to that 30% dry matter intake on a daily basis for 120 days.

Farming, and this includes dairies, changes with different areas, soils, climates and management plans. Applying a "one size fit all" type of

arbitrary conditions to farming operations eliminates the opportunities to determine the best type of management that the soil & climate and physical conditions that are often changable from year to year will dictate to a responsible operator.

The reporting requirements for organic record keeping are already a time consuming and sometimes repititive operation. Often the paperwork seems more important to our operation than the philosophy of the organic movement that started our involvement in the first place. Dont we really care that the really important thing is to get healthy food to our people that is completely free of harmful additives?

Thank you for your consideration

Sincerely
William A Simon
Simon Farms Inc.