

National Coalition Against the Misuse of Pesticides

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**Comments Regarding Final Rule
Presented to National Organic Standards Board
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By Beth Fiteni, National Coalition Against the Misuse of Pesticides

NCAMP is a nonprofit organization, established in 1981, for the purpose of educating the public about the hazards of toxic pesticide use and to promote the use of alternative least toxic methods of pest control in homes, schools, agriculture, etc. NCAMP participated in the development of the Organic Foods Production Act of 1990 and commented extensively on the Proposed Organic Rule of December 1997.

NCAMP would like to express to the Board our commitment to OFPA and reiterate our position that no synthetics be allowed for use in organic production. As a membership organization, we represent the grassroots constituency that buys organic products with the trust that no toxic substance, synthetic or non-natural substances has been intentionally added to the product, if it is labeled organic. If the Organic Rule follows the language in OFPA's handling section, then this trust will be well-founded. If it becomes necessary for an organic producer to use a synthetic not found on the National list of synthetic substances allowed for use, then the labeling option "made with organic ingredients" is a fair option that clearly informs the consumer.

I would also implore the Board to keep in mind the sensitive population of people suffering from multiple chemical sensitivity, who rely heavily on the organic industry to provide pure food and clothing that is safe and will not aggravate their symptoms.

We also want to express concern about the use of list 3 inerts, or those of "unknown" toxicity. While we are aware of the presence of such substances in soaps and Bt formulations currently in use by organic farmers, we would like to see strict adherence to OFPA which requires a review of these ingredients for inclusion on the National List. Every effort should be made, in a cooperative manner, to obtain information about these inerts from the manufacturers so that a thorough evaluation can be made in each individual case. The burden should be on the person [entity] wishing to use the substance to prove that it's safe.

Overall, NCAMP believes that the national organic program is a workable system. We are sensitive to the concerns of producers, that they may suffer adverse economic impact from strict regulation, but we are confident that the organic industry can adjust to meet this challenge.