



Secretary Michael Johanns
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

January 20, 2006

Dear Secretary Johanns,

We, the undersigned consumer groups, strongly support the role of the National Organic Standards Board (NOSB) to serve as a multi-stakeholder advisory group to the United States Department of Agriculture's National Organic Program as defined by the Organic Foods Production Act of 1990. We strongly support the specific, designated, appointed roles of the NOSB, defined by 7 U.S.C. 6518(b) to include four farmers/growers, two handlers/processors, one retailer, one scientist, "three shall be individuals who represent public interest or consumer interest groups "three environmentalists, and one certifying agent each of whom serve for a five year term. We believe that the interests represented by each group are vital to the authenticity of the NOSB.

For these reasons, we feel that it is important to voice concern and opposition to the recently announced appointments of Katrina Heinze, a manager at General Mills and Daniel Giacomini, a consultant to the organic dairy industry to serve as consumer / public interest group representatives on the NOSB. These individuals do not reflect the specific interests of consumers or the public but rather the interests of the industry. For example, General Mills is a large corporation that has a vested interest in the sales of organic food products, which is in conflict with representing a consumer / public interest position on the NOSB.

We believe that the veracity of the consumer / public interest positions is being compromised by these appointments. These individuals may be appropriate to serve for industry-related slots on the NOSB but it is misleading to have them represent the interests of consumers and the public interest. We believe that these positions need to be filled by those who are working directly on behalf of consumers and the public -- not by those who are benefiting financially from the organic industry or from the sales of organic food to consumers.

As strong supporters of a public National Organic Program and the diverse but distinct roles defined by law for the NOSB, we urge you to reconsider these appointments and to take the time to find individuals who's sole purpose is to represent consumers and has no financial stake in the sale of any one organic product. Please feel free to contact us if you have any questions.

cc: National Organic Program

Sincerely,

Urvashi Rangan, Ph.D.
Senior Scientist and Policy Analyst
Consumers Union

Joe Mendelson
Legal Director
Center for Food Safety

Caroline Smith Dewall
Director of Food Safety
Center for Science in the Public Interest

Carol Tucker Foreman
Director of Food Policy Institute
Consumer Federation of America

Ronnie Cummins
Executive Director
Organic Consumers Association

Wenonah Hunter
Executive Director
Food and Water Watch

Jay Feldman
Executive Director
Beyond Pesticides / NCAMP

Tyson Slocum
Acting Director, Energy Program
Public Citizen