
**Friends of the Earth ** Natural Resources Defense Council
League of Conservation Voters ** Sierra Club
Physicians for Social Responsibility
National Environmental Trust ** Union of Concerned Scientists
The Wilderness Society ** Environmental Defense Fund**

Hon. Daniel Glickman
Secretary
United States Department of Agriculture
14th and Independence Ave., S.W.
Room 200-A, Admin. Bldg.
Washington, D.C. 20250
Via Fax 202-720 2166

Dear Secretary Glickman,

On behalf of all the members represented by our organizations, we are writing to voice our strong opposition to significant portions of the USDA's recently proposed National Organic Program. 62 Federal Register 65851 (December 16, 1997). The development of national organic agricultural standards presents your agency with a unique opportunity to achieve pollution reduction while financially bolstering small farmers and encouraging consumer acceptance of the fastest growing segment of American agriculture.

In 1990, with the support of numerous environmental organizations, Congress passed the Organic Foods Production Act (OFPA). The environmental community eagerly anticipated the potential ecological benefits of the Act, and strongly supported its encouragement of a vibrant, growing segment of food production that reduces overall pesticide use, helps restore water and soil quality, and provides consumers with an ecological choice on how their food is produced. Unfortunately, the USDA's recently proposed National Organic Program threatens to undermine the significant ecological gains promised by passage of the 1990 Act. As proposed, the USDA program ignores significant public input concerning the characteristics of the standards, fails to achieve the environmental benefits possible, allows numerous practices that are inconsistent with organic production, handling and processing, and places a potentially prohibitive financial burden on small organic farmers, processors, and certifiers.

Since the OFPA's passage, the statutorily created National Organic Standards Board (NOSB) (a national citizens board composed of farmers, consumers, processors,

environmentalists and scientist) has held more than a dozen public meetings to develop consensus recommendations on organic standards and practices. In complete disregard of seven years of public comment and involvement, the agency's proposal has rejected virtually every recommendation it has received from the NOSB. As a result, the agency's proposal has betrayed the fundamental public-private partnership that was the basis of the 1990 Act.

More specifically, the USDA proposal will allow a number of practices that are contrary to the sustainable environmental principles which we support as the foundation of organic farming and processing practices. For example, the proposed rule would allow the use of genetically modified organisms, ionizing radiation (irradiation) and municipal sewage sludge. Allowance of these practices in organic production, handling, and processing contradicts consumer expectation and the NOSB's recommendations.

Further, the USDA has gone beyond its statutory authority by adding numerous synthetic substances to the NOSB's National List of Allowable Substances. The agency's proposal has also removed all of the NOSB's use restrictions on allowed synthetic substances. As a result, the USDA has proposed a national organic program that would permit the indiscriminate use of numerous synthetic materials and chemicals.

In addition, the proposed rule fails to establish a firm set of standards that will develop an alternative organic livestock sector. As written, USDA will allow farmers who arbitrarily restrict outdoor access for livestock, use non-organic animal feeds and administer antibiotics on slaughter stock animals to label their products organic. At a time when the public is increasingly concerned with the environmental impacts of large scale, factory meat and poultry facilities, the USDA's proposal represents a complete dismissal of the NOSB's livestock recommendations and fails to put in place a set of alternative standards that will achieve both consumer acceptance and overall environmental benefits.

The USDA proposal also fails to provide support for the numerous small farming, processing and certifying operations that make up the majority of the organic agricultural community. Again, disregarding the direct input of the organic community, the proposal sets accreditation fees at such high levels that it will force smaller operations out of the national organic program. Organic sales are now well over 3 billion dollars per year and are projected to grow 20% annually. The potential of forcing a number of small producers out of the program could cause irreparable harm to the fastest growing sector of American agriculture.

Finally, the USDA's proposal may negatively affect a wide range of consumer purchasing habits that have environmental benefits. The current national organic proposal would prohibit many eco-labels that allow consumer choice and have helped develop a vibrant consumer market in products that have led to significant reductions in pollution. This proposal unnecessarily eliminates consumer choice and contradicts environmental marketing guidelines firmly established by the Federal Trade Commission.

In conclusion, the development of a national organic program is an important step in developing a consumer accepted, ecologically-based agricultural system. Unfortunately, the current USDA proposal fails to implement the OFPA in the manner consistent with the goals and ideals supported by our organizations. We urge you to withdraw the current proposed rule and repropose a rule that comports with the OFPA and the National Organic Standards Board's recommendations.

Sincerely,

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