



# National Organic Coalition

3540 Route 52, Pine Bush, NY 12566  
845-744-2304 email: liana@hvc.rr.com

**September 23, 2008**

Members, Sustainable Agriculture Draft Standard for Trial Use Standards Committee  
Leonardo Academy  
1526 Chandler Street  
Madison, WI 53711

## **Re. ANSI “Sustainable” Standard**

Dear Friends:

The National Organic Coalition is deeply concerned about the adverse impact that a sustainable agriculture label will have on the urgent need to increase our nation’s organic acreage and production practices. The advancement of organic systems, as an alternative to toxic agrichemical practices, is the most effective way to (i) eliminate hazardous and synthetic pesticide and fertilizer use, (ii) protect those who work in agriculture, (iii) curtail threats to the environment and wildlife, and (iv) reduce the pressures on global climate change. The growth of the organic sector is critically needed for environmental, health and labor protection. To the extent that a standard and label are created for the term sustainable, it most certainly compromises key standards that are critical to our national and global health.

The development of commercial organic over the last several decades has relied on an adherence to two key elements that have defined the organic practice and developed widespread consumer trust. These two crucial elements include:

The Farm plan – This establishes acceptable management practices that avoid the need for chemical inputs by respecting the ecosystem, protecting and inviting natural predators, and incorporating defined natural fertilization, mechanical and cultural practices.

Acceptable materials – In instances where, despite compliance with the plan, conditions result in an identified need for inputs, only those natural materials

identified and evaluated in accordance with health and environmental safety standards are allowed.

To the extent that these elements are weakened or compromised, as they will be with a “less than organic” standard, a sustainable standard undermines and reverses progress, effectively driving markets to lower standards. With a sustainable standard, whether intentional or unintentional, consumers will undoubtedly be led to believe that, in supporting the standard, they are contributing to improved practices. In fact, they are slowing the growth of standards that are critical to our future health and environmental protection. There is no good reason to lower the standards at a time when consumers are increasingly drawn to organic.

While we are interested in helping to expedite the transition to organic practices on a larger scale, a sustainable standard will not achieve this. Instead, we should be developing incentive-based systems that facilitate the transition to organic practices.

We must conclude that a sustainable standard will damage the long-term success of organic, based on the following principles that are absent from the process.

**Only legitimize practices that are truly protective.** A standard takes us in the wrong direction if it undercuts the pressure and movement toward production methods that eliminate synthetic inputs that we know to be harmful or are not fully evaluated. Furthermore, characterizing or legitimizing these practices as sustainable, ecological, environmental, good for the earth and workers is counterproductive. Some volume of toxic chemical reduction and limited improvement in environmental and worker protection do not ensure safety and are not sufficient when safer organic practices exist.

**Starting point for standards negotiations and negotiators requires clarity.** It has become increasingly clear in recent years that the public health, environmental, labor and consumer communities do not have to accept in the production of food, the use of chemicals that cause cancer, birth defects, endocrine disruption, nervous and immune system damage, learning disabilities, and asthma and respiratory problems, among other long-term and acute health effects. Yet, this is not stipulated as a starting point for the sustainable standard. In fact, lengthy negotiations on acceptable synthetic inputs based on standard but flawed risk assessments undercuts the precautionary approach embraced by organic standards.

**Consumer acceptance must be a starting point and consistent focus.** Consumer acceptance drives the growth of organic practices. Standards that undercut organic will be viewed as “greenwashing” and illegitimate. To the extent that a standard is viewed as a marketing tool devoid of meaningful and truthful core values and principles, it will be dismissed by the public, or that portion of the public that is willing to pay whatever premium is associated with it.

The word sustainable should continue to characterize the broad concept of a livable future, and not be undermined by a standard with practices that belie that outcome. We are committed to advancing organic practices at a time when our nation's health and environment is threatened by agrichemicals and hazardous practices in food production. We believe that it is a critical time to redouble our efforts to grow organic and strengthen its integrity and accessibility. We wanted to formally let you know why we cannot join or support an effort that we believe will have the reverse effect.

Thank you for your consideration.

Sincerely,

**National Organic Coalition:**

Beyond Pesticides  
Center for Food Safety  
Equal Exchange  
Food & Water Watch  
Maine Organic Farmers and Gardeners Association  
Midwest Organic and Sustainable Education Services  
National Cooperative Grocers Association  
Northeast Organic Dairy Producers Alliance  
Northeast Organic Farming Association -Interstate Council  
Rural Advancement Foundation International -USA  
Union of Concerned Scientists