

Dear Secretary Vilsack, Deputy Secretary Merrigan and NOSB members,

As an organic industry stakeholder, I respectfully request that you consider the following:

- 1. I object to the NOSB and USDA leadership accommodating corporate interests that want to enhance their profits by including gimmicky synthetics and novel, patented ingredients in certified organic food.**

Martek Biosciences Corporation's DHA/ARA oils are inappropriate for use in certified organic foods. Some Martek oils are **extracted with the neurotoxic petrochemical hexane, posing questions about human health and environmental impacts.**

These supplements, from fermented algae and soil fungus, have never been part of the human diet. In the late 1990s, **Monsanto Corporation's scientists genetically modified strains of algae for high DHA production** (now marketed by Martek and added to some organic products).

Martek's oils also **contain various synthetic ingredients that have never been petitioned and approved for use in organics.** These include ingredients like mannitol, sodium polyphosphate, sodium ascorbate, glucose syrup solids and modified starch.

Adverse reaction reports filed with the FDA indicate **at least a subset of infants suffer serious health complications** after consuming formula supplemented with Martek oils. Serious and prolonged gastrointestinal illnesses have resulted in hospitalizations and dangerous invasive diagnostic testing. Many of the reports indicate that these babies recovered as soon as the Martek oils were removed from their diets.

Martek creates the impression that scientific consensus supports its DHA and ARA oils as beneficial supplements. But Martek leaves out **the preponderance of key studies which point to a single conclusion** in independent scientific analysis: Martek DHA in infant formula **does not benefit infant development.**

- 2. I object to the NOSB allowing factory farming practices in the production of chickens (both for egg and meat production) and hog production.**

The livestock subcommittee's proposal for requiring 2 square feet per laying hen, outside, is woefully inadequate, as are some of the other recommendations for poultry production (including turkeys) and the miserable amount of space proposed for hogs. These standards would literally make the US the *laughingstock* in international organic production and marketing. Welfare benchmarks need to be mandated in the regulations, not merely in unenforceable "guidance."

I support a minimum of 5 square feet per laying hen and enhanced space for pullets, turkey, other fowl and hogs.

- 3. Enforce the organic standards on factory dairies masquerading as "organic."**

After the organic community has invested almost 11 years of policy debate, attempting to rein-in "factory farms," milking thousands of cows each and masquerading as organic, it is entirely unacceptable that the USDA has been unwilling to expend the resources necessary to carefully verify whether these dairies, and their certifiers, are complying with the new regulatory benchmarks set in the "pasture rule."

I respectfully ask USDA leadership to immediately verify that the largest producers of certified organic milk are not economically disadvantaging smaller ethical competitors or continuing to defraud consumers and that new rules immediately be promulgated to prevent conventional cattle from being brought on to organic dairy farms as replacements or for expansion.

4. And finally, I want to clearly go on record that I want the Obama administration to appoint the best and brightest representatives in the organic community to sit on the NOSB board, truly upholding the will of Congress. No more corporate-backed imposters!

As a consumer, I buy food with the USDA Organic seal precisely to avoid unproven, questionably safe products like Martek's oils—genetically novel and synthetic—in my diet and to support humane animal husbandry practices resulting in superior nutrition.

The NOSB should improve animal husbandry standards and reject the Martek petition for “DHA Algal Oil” and “ARA Single-Cell Oil.” I call on the USDA to immediately remove these materials from the marketplace.

Thank you for listening to my concerns.

Sincerely yours,

Name: _____

Signature: _____

Address: _____

E-mail: _____

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Would you please consider making a tax-deductible contribution to The Cornucopia Institute to help underwrite this expensive campaign and the work we do to protect the integrity of the organic label—however, no donation is necessary for us to hand-carry your proxy letter to the upcoming USDA meeting.

\$30 \$50 \$100 \$250 \$500 \$1000 Other \$ _____

My check is enclosed VISA Master Card

Card #: _____ Expiration Date: _____

I am a Farmer Consumer Other _____

Signature: _____ Phone: _____

*Your financial contribution is voluntary, but we hope you will support the campaign to protect the livelihood of organic farmers.
No donation is necessary to hand-deliver your proxy letter to the USDA, but please consider supporting this campaign!*

Please mail your letter, as soon as possible, to:

**The Cornucopia Institute
PO Box 126
Cornucopia, Wisconsin 54827**

