



United States Department of Agriculture

Office of the Secretary  
Washington, D.C. 20250

March 10, 2010

Ole Norgaard, Chair  
Montana Organic Association  
Post Office Box 570  
Eureka, Montana 59917

Dear Mr. Norgaard

Thank you for your letter of March 5, 2010 which I received during our meeting at the Coop. You mentioned a number of items that we are focused on at the United States Department of Agriculture

We are in the process of rewriting the rules for genetically engineered crops and the approval of the same. We are also conducting hearings on issues of consolidation and concentration starting in Iowa. In addition, we are working with FSA to ensure that food safety negotiations help rather than hinder markets. While we may not always agree on these issues, we are very open to dialogue and are working hard to be supportive of organic producers. A recent commitment of Environmental Quality Incentives Program (EQIP) money and current efforts to promote the organic brand are two examples which reflect our commitment to organic producers

Sincerely,

A handwritten signature in blue ink that reads "Tom J. Vilsack". The signature is fluid and cursive, with the first name "Tom" and last name "Vilsack" clearly legible.

Tom Vilsack  
Secretary of Agriculture



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Montana Organic Association  
Box 570  
Eureka, Montana 59917

March 5, 2010

Tom Vilsack, Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Secretary Vilsack:

The Montana Organic Association would like to express appreciation for the statements that you and First Lady Michelle Obama made a year ago when the organic garden was sprouting in Washington, DC. That is something we all noticed, even here in Montana. Our thanks for doing that, and we know that the snow will eventually melt in Washington, DC so your gardens will prosper again.

The Montana Organic Association is a nonprofit trade association whose mission is to advocate for organic agriculture. We are pleased to represent a thriving industry that comprises a large, if not the largest, acreage of certified organic ground in the nation. Our members are certified organic producers and handlers and consumers of organic food, as well as agricultural professionals and educators working in the organic sector.

Over the past year, we noticed positive changes and more focus in the USDA's support of programs that affect organic agriculture, such as the National Organic Program, organic incentives through the NRCS and EQIP program, as well as the organic certification cost share program through the 2008 farm bill. We appreciate and thank you for your efforts to foster these positive changes. We urge your continued support so that these agencies and programs are well staffed and funded to support for the growth that is occurring in organic agriculture.

When those of us involved in organic agriculture look ahead, we are nearly overwhelmed with the current events and issues that may influence our livelihoods. Not only do we see a loss of prime farmland in Montana in some areas, but also depopulation of rural communities in other areas, as well as an increase in the average age of producers. We are concerned about the ability of young people to start in agriculture and to sustain their living. We see challenges to agriculture from climate change, and we need USDA to be proactive to help agriculture cope and address this complex issue. Genetic engineering is at the forefront of our concerns, and some segments of organic agriculture may not survive if genetic contamination occurs. Consolidation of the seed industry and the ability of farmers to grow seed or obtain seed of their choice are on our minds. Finally,



we see issues of fairness to small scale farms in the pending food safety legislation. We would like to address just a few of our issues in more detail below.

### **Genetically Engineered Crops (GE)**

Organic producers, handlers, and consumers are more than just interested in maintaining the integrity of organic, natural, and GE-free crops that are free from contamination. Not only is this an issue that is at the core of the Organic Food Production Act, but we think that producers have a right to grow crops and feed livestock without a threat of genetic contamination. Consumers have a right to choose food that is not genetically engineered or produced with genetically engineered feed.

The recent USDA Draft Environmental Impact Statement (DEIS) on glyphosate-tolerant alfalfa seemed somewhat callous in its consideration of organic agriculture and it grossly underestimated the significance of the impacts of contamination on organic markets for hay, dairy, sprouts, and honey as well as natural and other GE-free markets. Over 200,000 people have just commented their concerns with the DEIS. We do not wish to see agencies and farmers at odds with each other on this issue, and we urge you to take a leadership role in this critical matter. It is our position that the request to deregulate glyphosate-tolerant alfalfa should be denied to prevent what we see as irreparable harm caused by genetic contamination of organic and non-GE fields, food, and feed.

### **Consolidation of Seed Industry**

We are concerned with consolidation and patenting of seed varieties by a few large corporations. At issue is control of seed stocks and loss of farmers' abilities to select varieties of choice at reasonable prices, as well as the ability, possibly the right, to grow and save seed for their own planting. We are concerned about the investigation practices employed against farmers for possible unknowing acquisition of patented material and the costs that must be borne by farmers to defend against patent infringement lawsuits. We are concerned that the corporations are running away from their responsibilities by transferring liability and risk for GE contamination to farmers who choose to grow patented plants.

We find these developments deeply disturbing and would urge you to thoroughly support investigations in this matter. Certainly, farmers should not be charged with patent infringement or bear the costs to defend themselves for genetic drift that is beyond their control. The fundamental agricultural practice of seed saving must also be preserved and protected.

### **Pending food safety legislation**

Food safety is a priority for all of us; however, legislation in this area should not be one size to fit all. Much of the growing trend toward healthy, fresh, organic, and local food is through direct marketing and farmers markets by growers managing small acreages.



Consumers, in many cases, are able to know their farmers and processors and to choose products on the basis of that relationship. This relationship fosters quality, safety, transparency and accountability. In addition, small-scale food producers are regulated by local and state authorities. We do not believe that small scale direct marketing and processing poses either the complexity or the risk to food security as that of large scale producers and processors. We urge you to look into and support efforts to make the facility requirements and produce standards of Senate Bill 510's commensurate with the size and risk of operations.

We appreciate the time you took to come to Montana, to meet personally, and to listen to our thoughts. We hope that your visit to our great state was pleasant and productive. If we can ever be of service, please do not hesitate to call on us.

Sincerely,

Ole Norgaard, Chair  
Montana Organic Association

A handwritten signature in black ink, appearing to read "Ole Norgaard", is written over the printed name and title.

C: Senator Jon Tester