



National Organic Coalition

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September 30, 2010

Miles McEvoy, Deputy Administrator
NOP – USDA
Room 2646-So (Stop 0268)
1400 Independence Ave. SW
Washington, DC 20250-0268

Dear Miles:

On behalf of the National Organic Coalition (NOC), this letter serves as our formal request for the National Organic Program (NOP) to implement, without further delay, the National Organic Standards Board (NOSB) recommendation to prohibit cloned animals and their progeny in organic food, passed on March 29, 2007. The NOSB specifically recommends amending the NOP Rule Subpart C—Organic Production and Handling Requirements, §205.236 Origin of Livestock, “to clarify that cloning technology, including all progeny and succeeding generations of those progeny, be excluded from organic production.”

In its final report, the Board recommends adding Section (3) to §205.236 Origin of Livestock, under:

(b) The following are prohibited:

(3) Livestock, progeny and all succeeding generations from cloned livestock, reproductive materials, or any other products derived from animals produced using animal cloning technology.

NOC fully supports the NOSB’s conclusion in its recommendations that adding animal cloning technology to the definition of “Excluded Methods” strengthens

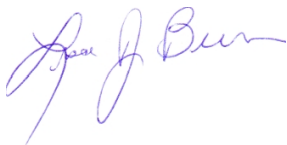
both the integrity of the organic standards and the Origin of Livestock section of the rule. This regulatory clarification ensures that certifying agents and the organic industry take appropriate measures to exclude clones and progeny in organic foods, thereby strengthening consumer confidence in the USDA seal and the organic label. At the same time, the NOP must require the enforcement of livestock record keeping, as prescribed in the NOP Handbook Record Keeping of Certified Organic Operation, NOP 6202. This will assure organic consumers that the NOP is taking the appropriate steps to adopt and enforce §205.236 Section (3) of the Origin of Livestock provision by preventing clones and their progeny from entering the organic food supply chain.

Increasingly, media reports have surfaced which document the unregulated and unlabeled release of cloned animals and their offspring into our nation's food supply. This has happened despite FDA's request for the cloning industry to adhere to a *voluntary moratorium* on the introduction of clones and their offspring into the marketplace. In light of these reports, the NOP must act quickly to reassure organic consumers that animal cloning technology is an excluded method in organic and that all generations of progeny of clones are prohibited.

We urge you to take immediate action on this important issue of concern to the organic sector and to announce the NOP's strategy for implementing the prohibition of clones and their offspring at the upcoming NOSB meeting in Madison, WI, 25-28 October. We further urge the NOP to work with FDA to establish a compulsory pedigree and DNA registry of clones before they are allowed into the marketplace as the best way to ensure that clones and their offspring do not enter the organic food stream of commerce.

Thank you for your consideration.

Sincerely yours,

A handwritten signature in blue ink that reads "Lisa J. Bunin". The signature is fluid and cursive.

Lisa J. Bunin, Center for Food Safety (lbunin@icta.org)

A handwritten signature in black ink that reads "Liana Hoodes". The signature is cursive and elegant.

Liana Hoodes, Director, NOC