



United States Department of Agriculture

Office of the Secretary
Washington, D.C. 20250

JUN 6 2008

Mr. Michael Army
President
Leonardo Academy
1526 Chandler Street
Madison, Wisconsin 53711

Dear Mr. Army:

The United States Department of Agriculture (USDA) has been approached by several organizations representing a large number of stakeholders in the agricultural community who are greatly concerned about the process used and potential impacts of the proposed Draft National Standard for Trial Use Sustainable Agriculture Practice Standard (SCS-001) under development by Leonardo Academy. We have serious concerns regarding the use of and contents of the document itself, the methodology being employed in the standard setting process, and inconsistencies between the draft standard and U.S. domestic and international policies.

The subject of "Sustainable Agriculture" was addressed by Congress in the 1990 "Farm Bill" (Food, Agricultural, Conservation, and Trade Act of 1990 (FACTA), Public Law 101-624, Title XVI, Subtitle a, Section 1603). Within that law, "the term sustainable agriculture means an integrated system of plant and animal production practices having site-specific application that will, over the long term:

- Satisfy human food and fiber needs;
- Enhance environmental quality and the natural resources and on-farm resources and integrate, where appropriate, natural biological cycles and controls;
- Sustain the economic viability of farm operations; and
- Enhance the quality of life for farmers and society as a whole."

The wording of the law indicates a broad definition of sustainable agriculture, recognizing that sustainability can be achieved by employing various methodologies and practices. The definition is intentionally broad and does not exclude particular practices or technology that may contribute to achieving that sustainability. This perspective is reflected in the official U.S. Government positions being carried forward in various international fora in which we are discussing sustainable agriculture, and we believe that standards developed for U.S. agriculture, whether public or private, need to be consistent with U.S. laws and policies.

In contrast, the draft standard from which the Leonardo Academy is starting is highly restrictive. The proposed standard identifies sustainable agriculture as a subset of certified organic agriculture as defined in the National Organics Program (NOP), with the various proscriptions

specific to that program. Consequently, producers meeting the draft standard would not be allowed to use modern biotechnology, synthetic fertilizers, or other modern technologies – tools that are well within sustainable agriculture as defined by law but would in fact either be required to be certified organic or document their intentions and plan to become certified organic.

Moreover, while the draft standard claims to uphold the NOP as the standard producers should strive to achieve, it infringes on the integrity of the NOP standard in several ways. The draft standard permits deviations for individual crops from organic standards and conformance on a regional basis. It permits relaxation of the NOP when organic standards are not practicable. The draft standard further suggests that certain organic practices could negatively impact sustainability. Yet with these conflicting proposals, the draft standard suggests that one of its aims is to reduce confusion and disagreement over the term “organic,” which has been well defined in statute and regulation since at least 1990.

At a time when global food prices are reaching record or near-record levels, an agricultural system that narrowly defines sustainability as to reject the use of modern technologies can hardly be considered sustainable. Nor is there any sound evidence put forth that these excluded tools and technologies are as a group inherently unsustainable.

USDA has long supported the development of voluntary consensus standards to meet the needs of the private sector when the standards are properly developed in an inclusive and balanced process that takes into account the perspectives of all affected stakeholders. USDA also believes that the development of an appropriate standard for sustainable agriculture could be valuable for the future of agriculture and the environment if based on existing definitions currently published and available through the National Agricultural Library’s Alternative Farming Information Center web site at <http://www.nal.usda.gov/afsic/pubs/terms/srb9902.shtml>.

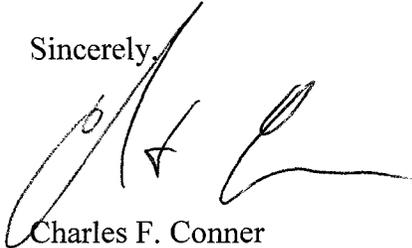
While the American National Standards Institute (ANSI) provides a detailed process for public and private collaboration in the development of voluntary consensus standards, the drafting process utilized by the Leonardo Academy was not inclusive of all facets of U.S. agriculture. When it comes to creating a suite of standards for sustainable agriculture, experts managing nearly 1.4 billion acres of crop, forest, and grazing lands need to be represented. If the ANSI published process was correctly followed, then the Institute’s cardinal principles of consensus, due process and openness would have been adhered to and all interest groups and stakeholders, including landowners, producers, and operators would have been included. This leads us to believe that national consensus on the basis of this document cannot be achieved. This is reflected in the concerns expressed by stakeholders representing a major portion of U.S. agriculture. Likewise, the composition and voting procedures of the proposed committees are also not inclusive of those who already practice, utilize and contribute to sustainable agriculture in its many forms.

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We do not believe that the document, Draft National Standard for Trial Use Sustainable Agriculture Practice Standard (SCS-001), provides an adequate basis to move forward toward the development of a national consensus standard. Moreover, the committee structure does not represent all of those involved in sustainable agriculture and is constructed in a way that excludes them and we believe it would yield a biased outcome. Due to the serious problems that we foresee with this document and the process by which it was initially developed, we have very deep concerns but are willing to work with the Leonardo Academy to find alternative approaches and/or processes to resolve these issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charles F. Conner', with a stylized flourish extending to the right.

Charles F. Conner
Deputy Secretary

cc: Christopher A. Padilla
Under Secretary for International Trade
International Trade Administration
U. S. Department of Commerce