

February 20, 2008

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Bureau of Economic, Energy and  
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Dear Sirs,

We are writing to bring to your urgent attention our concerns about the process used to launch the proposed American National Standards Institute (ANSI) Draft Standard for Sustainable Agriculture for Trial Use, and its substance.

The standard as drafted:

- equates best agricultural practices with organic practices,
- rejects the use of biotechnology,
- requires that producers follow organic processes rather than achieving specific results that can be objectively and metrically validated as sustainable,
- sets carbon emission standards for agricultural crops and processes,
- applies to biofuels, and
- disregards significant public policy and standards processes that govern all of the above subjects.

Though the standard would be voluntary, if adopted as an ANSI standard, it would be ANSI's responsibility as the sole U.S. representative to the International Standards Organization (ISO), to attempt to promulgate it internationally. This is an issue of great concern because of the national and international implications.

We are concerned that relevant U.S. government agencies with statutory responsibility in these areas were apparently neither consulted in advance of this process, nor have been invited to address the substance of it.

We understand and appreciate that many of you have begun to review and address the standard-setting activities now envisaged by ANSI, the ISO, and the many other voluntary standards-setting processes now underway in the food and agriculture sector. Indeed, we have worked productively with many of you to address some of these important issues in the context of the Codex Alimentarius Commission and U.S. government regulatory proceedings for labeling and market-based activity like the National Organic Program.

However, we have not encountered another situation where a private organization has effectively managed to commandeer a process to generate a nationally-endorsed label for its own commercial benefit with so little public sector input. Urgent attention should be paid to this process by policy-makers, both in its generic form and with respect to this particular standard.

We look forward to discussing our concerns with you and your staff as you review the process used to generate this standard. It is our desire to find a solution that will ensure that the same kind of process will not erode the public policy processes that have taken place in the food and agriculture sector.

In the meantime, we would appreciate your urgent attention to this standards process and the need to participate in a meeting to be held in Washington, D.C. on February 29. We hope you will participate both in the upcoming meeting and in this standards process to the greatest extent possible.

We appreciate that this may require significant resources from your agencies but believe that your input is essential.

Sincerely,

The American Farm Bureau  
Almond Board of California  
American Seed Trade Association  
American Soybean Association  
American Sugar Alliance  
Animal Health Institute  
Arkansas Crop Protection Association

Biotechnology Industry Organization  
California Grain and Feed Association  
California Seed Association  
California Pear Growers  
California Warehouse Association  
California Association of Wheat  
Growers

Corn Refiners Association  
Croplife America  
Crop Protection Association of North Carolina  
Delaware Maryland Agribusiness Association  
Del Monte Foods  
Dickman Farms, Inc.  
Easter Lily Research Foundation  
Far West Agribusiness Association  
Florida Fertilizer & Agrichemical Association  
Georgia Agribusiness Council  
Grocery Manufacturers Association  
Illinois Fertilizer & Chemical Association  
Indiana Plant Food & Chemical Association  
Kansas Agribusiness Retailer Association  
Michigan Agri-Business Association and the Michigan Bean Shippers Association  
Mid America CropLife Association  
Minnesota Agri-Growth Council  
Minnesota Crop Production Retailers  
Missouri Agribusiness Association  
Montana Agricultural Business Association  
The National Cotton Council  
National Corn Growers Association  
National Association of Wheat Growers  
National Oilseed Processors Association  
Nebraska Agri-Business Association  
North American Millers' Association  
North Carolina Crop Protection Association

North Dakota Agricultural Association  
Ohio Agribusiness Association  
Ohio Professional Applicators for Responsible Regulation  
OMG Meadowfoam Oilseed Growers Cooperative  
Oregon Agricultural Aviation association  
Oregonians for Food and Shelter  
Oklahoma Agribusiness Retailers Association  
Pacific Northwest Agricultural Aviation Alliance  
Pacific Northwest Direct Seed Association  
RISE (Responsible Industry for a Sound Environment)  
Rocky Mountain Agribusiness Association  
South Carolina Fertilizer & Agrichemicals Association  
South Dakota Agri-Business Association  
Southern Crop Production Association  
Syngenta  
Virginia Crop Production Association  
Washington Farm Bureau  
Washington Friends of Farms and Forests  
West Coast Beet Seed Company  
Wisconsin Crop Production Association  
Wyoming Ag-Business Association,  
Wyoming Wheat Marketing Commission  
Wyoming Wheat Growers Association  
Wyoming Crop Improvement Association