

January 31, 2008

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

Dear Mr. Arny,

We are writing in follow-up to our conversation on January 17<sup>th</sup> with Anne Caldas of American National Standards Institute (ANSI) to express our concern about the process used to establish the proposed American National Standards Institute Draft Standard for Sustainable Agriculture for Trial Use. We understand the Leonardo Academy's desire to generate and harmonize sustainability standards. It is unfortunate, however, that this standard with its important implications for American agriculture was processed in this manner. We are concerned that the ANSI process has not been followed and that this may have already led to irremediable defects in terms of ANSI's ability to receive approval.

Stakeholder concerns and the controversial nature of the standard make procedural issues of utmost importance.

- It equates organic practices with best agricultural practices, a conclusion that would be soundly rejected by many in the scientific community and an issue that will provoke intense debate between the organic and conventional agricultural communities.
- It rejects the use of biotechnology, perpetuating scientifically unsound and overly precautionary approaches that have been rejected by many governments, including our own, and which have provoked significant trade concerns.
- It requires that producers follow organic processes rather than achieving specific results that can be objectively and metrically validated as sustainable, making it unsuitable for the very sectors of agriculture that would be impacted
- It requires agriculture to engage in discussions of carbon emission standards that are well beyond the technological knowledge and capability of most of the participants likely to be engaged in this standards process. Carbon emissions standards are the proper focus of climate change discussions and regulatory guidance processes, which have just begun.
- It applies to biofuels, which are also the subject of many other standard setting efforts, including the International Standards Organization (ISO) and the

Roundtable on Sustainable Biofuels. Food and agriculture stakeholders are also participating in other initiatives including legislative discussions.

We believe that the ANSI process is not being followed and we would like to highlight several concerns.

- The draft standard for trial use was not notified to “materially affected stakeholders” prior to its adoption for trial use by the Leonardo Academy.
- The draft standard has not since been notified effectively to materially affected stakeholders both domestically and internationally.
- The standard’s stated purpose is to define sustainable agriculture. However, the draft standard as written clearly pertains to “sustainable organic agriculture” only and does not meet the definition of “sustainable agriculture” as defined in law by the 1990 Farm Bill. Therefore, had it been notified as a standard for “sustainable agriculture”, it would have been misleading and inaccurate.
- Because the Leonardo Academy has demonstrated that it has little knowledge of or experience with the broad range of stakeholders that will be affected by this standard, we are concerned that the process it is following will not accurately reflect the balance or scope required by its rules and by ANSI’s.
- We are concerned that the Leonardo process will not garner sufficient input to ensure that this standard is credible, particularly since Leonardo has not established a group composed of government experts.

We encourage the Leonardo Academy to narrow the scope of this standard to organic agriculture and work with other ongoing standard setting efforts. We believe that the inevitable years of intense debate on irresolvable conflicts that this standards process will provoke can and should be avoided.

American Farm Bureau  
American Seed Trade Association  
American Soybean Association  
American Sugar Alliance  
Animal Health Institute  
Biotechnology Industry Association  
California Association of Wheat Growers  
California Citrus Quality Council  
California Dried Plum Board  
California Grain and Feed Association  
California Grape & Tree Fruit League  
California Pear Growers  
California Seed Association  
California Warehouse Association

California Tree Fruit Agreement  
Croplife America  
Cotton Incorporated  
Del Monte Foods  
Florida Fruit and Vegetable Association  
Grocery Manufacturers Association  
Lodi-Woodbridge Winegrape Commission  
National Association of Wheat Growers  
National Cattlemen's Beef Association  
National Corn Growers Association  
National Cotton Council  
National Oilseed Processors Association  
National Sorghum Producers  
North American Millers' Association  
RISE  
United Soybean Board  
U.S. Rice Producers Association  
United States Soy Export Council  
USA Rice Federation

cc. Mr. Joseph Bhatia, President  
Ms. Anne Caldas, Director  
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Accreditation Services  
American National Standards Institute  
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