

#7

May 21, 2003

SPOTTSWOODE

VINEYARD & WINERY

The Tax and Trade Bureau
Office of Public and Governmental Affairs
650 Massachusetts Avenue, NW
Room 8290
Washington, DC 20226

Re: Notice 934

To Whom It May Concern:

This letter addresses the October 2002, National Organic Program (NOP) / Tax and Trade Board (TTB) labeling regulations for wine produced from organic grapes. We are very concerned that these new labeling restrictions, which require an ingredients statement on any wine that carries an organic claim, are not only unfair to organic grape producers and wineries who use organic fruit, but will also be confusing and misleading to consumers. We encourage the Tax and Trade Board and the National Organic Program to remove the ingredients statement requirement from their wine labeling policy.

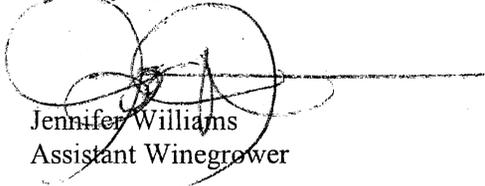
As an estate vineyard and winery, we organically grow the grapes that are used to produce our commercial wine. Our commitment to organic farming began in 1985 and since 1990, we have been certified organic by the California Certified Organic Farmers (CCOF). We feel that it is of the highest importance to protect the integrity of the organic claim on food and wine products both for the benefit of the consumer and the grower.

The NOP / TTB labeling regulations for wine require that any label that uses any organic claim must include an ingredients statement. Yet wines produced by conventional methods or from grapes grown by conventional farming practices remain exempt from listing ingredients. Because wine has not historically been required to detail its composition, consumers are not familiar with many simple winemaking inputs. We fear that introducing an unfamiliar list of ingredients on some wine products, and not on others, will be confusing to consumers, leading them to misunderstand the differences between conventionally produced wines and wines that claim organic inputs.

To prevent customer misunderstanding and even their fear of unfamiliar ingredients, many wineries will cease to label their wines with the organic claim in order to avoid listing ingredients. Viewing organic labels as too risky, many growers and wineries will drop from organic certification programs altogether. These actions do little for a consumer's right to know or choose and less to encourage sustainable, organic farming practices.

The new NOP / TTB labeling requirement for wine is not a progressive step for organic grape and wine producers or their customers. We encourage you to remove the ingredients statement requirement from your wine labeling policy.

Thank you,



Jennifer Williams
Assistant Winegrower