1. Full citation.

Allen, Terry J. "The Cruel Irony of Organic Standards." *In These Times*. In These Times and The Institute of Public Affairs, 31 Aug. 2010. Web. 11 Feb. 2013

2. Where did/does the author work, what else has s/he written about, and what are her/his credentials?  (This question only has to be answered once for Vogel.)

Terry Allen is a senior editor for *In These Times*, and has written a monthly investigative health and science column since 2006. She also served as senior researcher for the book, *The Impeachment of George W. Bush* (2007) and her work contributed to the documentary film, *Trouble The Water* (2008)

3. What are the topics of the text?

The article discusses the negative impacts of strict agricultural regulations, particularly those governing organic certification.

4. What is the main argument of the text?

Allen argues that the strict prohibition of antibiotic use in the organic farming of livestock is inhumane and unreasonable. Farmers are not able to give antibiotics to a sick animal without losing the “organic” certification for that particular animal. As a result, many animals are dying needlessly.

5. Describe at least three ways that the argument is supported.

Allen uses strong imagery to help the reader visualize the circumstances which lead to an animal’s death. Her vivid descriptions of a sickly dairy calf whose death may have been prevented with antibiotics certainly evoke a strong sense of sympathy within the reader.

She also relies on an interview with Brian Baker, the director of Alfred State College’s Institute for Sustainability, to strengthen the argument for increased discussion on the topic of antibiotic use.

The article also draws on European and Canadian regulation, which does allow strictly regulated therapeutic antibiotic use on organic farms.

6. What three quotes capture the message of the text?

*“Farmers are not generally callous or cruel, but neither are they sentimental. Organic standards mandate that they take all measures to save the life of an animal, but treatment strategies can be subjective, and loss of organic status factors into a farmer’s decision. After all, antibiotics don’t always work, and sometimes animals recover without them. So decent farmers wait while an animal suffers, and crosses that line past which no intervention can reverse the slide to death.”*

*“While some European and Canadian organic regulations are tighter, farmers there can administer therapeutic antibiotics as long as the animal is treated rarely, and is withdrawn from meat or milk production for twice the time the drug remains in its system*.”

*“It’s time for the organic movement to incorporate science and compassion into organic standards and allow the rare, regulated use of life-saving antibiotics.”*

7. What three questions about environmental risk and precaution does this article leave you with?

What other downsides of food safety regulations are often “swept under the rug”?

What are the benefits of no antibiotic use, relative to one-time use? Or are there none, and is this simply an overly strict interpretation of the precautionary principle?

How does public education factor into food safety regulation? If the consumers knew the downsides of organic farming, for example, would it affect their decisions?

8. What three points, details or references from the text did you follow up on to advance your perspective on environmental risk and precaution? (Provide citations, with a brief explanation of what you learned.  One of these should be fully annotated, as your second required reading for each week.)

I looked up the USDA’s standards for organic certification, which can be found here: <http://www.usda.gov/wps/portal/usda/usdahome?navid=ORGANIC_CERTIFICATIO>

While at the USDA website, I noticed a link for the “Regulatory Process.” Upon clicking the tab, I found an outline of the four steps used by the organization to “create,amend, and remove regulation.”

*1.****Initial Planning****.**Before beginning the rulemaking process, we must first determine that the regulatory action is authorized by the Organic Foods Production Act. We may initiate rulemaking for a variety of reasons:*

* *To describe new requirements*
* *To clarify existing language*
* *To amend the national List, based on recommendations from the National Organic Standards Board*

*2.****Proposed Rule****. We issue a notice of proposed rulemaking, which proposes to add, change, or delete regulatory language and includes a request for public comments during a specified time period.*

*3.****Public Comments****. We analyze all public comments on the proposed rule.*

*4.****Final Rule****. We analyze all public comments on the proposed rule.*

***Timeline.****The rulemaking process is lengthy, taking anywhere from one to multiple years. Our timeline depends on multiple factors:*

* *Complexity or controversy associated with the topic*
* *Amount of public participation*
* *Other projects on our workplan*

Source: <http://www.ams.usda.gov/AMSv1.0/ams.fetchTemplateData.do?template=TemplateN&navID=RulemakingProcessNOPOrganicStandards&rightNav1=RulemakingProcessNOPOrganicStandards&topNav=&leftNav=NationalOrganicProgram&page=NOPRegulatoryProcess&resultType=&acct=nopgeninfo>

I also decided to look into how farmers are affected by food safety regulation. I found an interview with local farmers in and around Texas. The interview highlights the farmers’ reactions to the Food Safety Modernization Act. One of the farmers discussed how stricter food regulation (particularly when driven by fear of large-scale profit-driven farming processes) can actually aid local farmers, as consumers are drawn to local food sources. Community food systems become more appealing as a result. Unfortunately, the farmer then went on to discuss how the strict regulations put local farmers at a disadvantage, and lessen their chances of being able to survive financially in the large-scale food market. (Source: <http://tv.naturalnews.com/v.asp?v=3f59f82202d42a6e9cefa2d1eabbfc4e>)