

FOOD Farmers

Federation Of Organic Dairy Farmers

January 25 2008

Re: Docket No. AMS-LS-07-0131

FOOD Farmers, the umbrella organization of the Northeast Organic Dairy Producers Alliance, the Midwest Organic Dairy Producers Alliance, and the Western Organic Dairy Producers Alliance, represents over 800 organic dairy farmers across the country. We strongly request that the proposed “naturally raised” label be abandoned. Instead, USDA should continue to work on individual, specific claims such as “no supplemental hormones added”, “no antibiotic used”, “free range”, “pasture raised” and “no animal byproducts fed”.

The criterion for the “naturally raised” label is far too narrow to fit what consumers expect as “natural”. In the mind of the consumer and producer, the word natural denotes the raising of livestock in conditions and ways that mimic nature. Defining a general, broad term like “natural” to only mean the exclusion of use of three classes of products (growth promotants, antibiotics, and mammalian or avian by-products) but not clearly defining and specifying living or environmental conditions or animal welfare standards is very misleading. The lack of comprehensiveness in the standard and the resulting misunderstanding by consumers when they learn of the real meaning will do damage to the marketplace because it will call into question the integrity and value of existing USDA accredited labels.. It will cause economic hardship to those producers who are truly managing their animals in the ways that consumers expect are part of a “naturally raised” label.

Another area of confusion a “naturally raised” label would raise is that it is so closely worded to the FSIS label of “natural” in regards to processing of meat. For labels to have meaning and real long term value to farmers and consumers, they need to be distinct and clearly differentiated from other existing labels.

Instead of the “naturally raised” label, please continue with the AMS plan to have a series of very specific claims--labels that will convey absolute clarity and understanding: “no supplemental hormones added”, “no antibiotic used”, “free range”, “pasture raised” and “no animal byproducts fed”. There is no question what these specific claims mean and they will provide the level of reliability and crystal clear understanding that is needed to make these labels a benefit to both consumers and farmers. They will allow the producers to succinctly and accurately describe to the consumer how their products are raised and will allow consumers to easily understand exactly what is being claimed.

As farmers that rely on the USDA “certified organic” label, we fully understand the economic value that labels with specific, well written rules can have. We also know the damage that can be done when label language is vague, ambiguous and / or doesn't mean what consumers expect it to mean.

Please, discard the proposed “naturally raised” label. It is a can of worms that will not only create problems for that specific label itself but will also have a large negative effect on other labels.

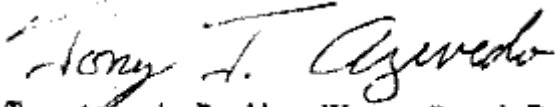
Please contact Ed Maltby, NODPA Executive Director, at 413-772-044 or ednodpa@comcast.net or 30 Keets Rd, Deerfield, MA 01342, for more information on our comment.

Sincerely



Steve Morrison
President

Steve Morrison, President, Northeast Organic Dairy Producers Alliance



Tony Azevedo, President, Western Organic Dairy Producers Alliance



Darlene Coehoorn, President, Midwest Organic Dairy Producers Alliance

The Federation Of Organic Dairy Producers is an umbrella group for the three regional organic dairy farmer organizations: Northeast Organic Dairy Producers Alliance (NODPA), Midwest Organic Dairy Producers Association (MODPA), Western Organic Dairy Producers Alliance (WODPA),

Northeast Organic Dairy Producers Alliance (NODPA) mission is to **enable organic dairy family farmers, situated across an extensive area, to have informed discussion about matters critical to the well being of the organic dairy industry as a whole** with particular emphasis on:

1. Establishing a fair and sustainable price for their product at the wholesale level.
2. Promoting ethical, ecological and economically sustainable farming practices.
3. Developing networks with producers and processors of other organic commodities to strengthen the infrastructure within the industry.
4. Establishing open dialogue with organic dairy processors and retailers in order to better influence producer pay price and to contribute to marketing efforts.

Midwest Organic Dairy Producers Alliance (MODPA) mission is to promote communication and networking for the betterment of all Midwest dairy producers and enhance a sustainable farmgate price.

Western Organic Dairy Producers Alliance (WODPA) mission is to preserve, protect and ensure the sustainability and integrity of organic dairy farming across the west.