

Northeast Organic Dairy Producers Alliance

NODPA



March 16, 2007

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To: Ms. Valerie Frances
Executive Director, NOSB
USDA-AMS-TMD-NOP
1400 Independence Ave., SW., Room 4008-So.
Ag Stop 0268, Washington, DC 20250-0268

From: The Northeast Organic Dairy Producers Alliance

Re: AMS-TM-07-0032; TM-07-05

**Comments on the NOSB Livestock Committee's 2/20/07 draft
"Cloning Recommendation"**

As organic dairy producers, the over 450 farmer members of the Northeast Organic Dairy Producers Alliance (NODPA) have great stake in the outcome of any regulations affecting organic dairy standards. The current questions facing the NOSB regarding the use of cloned livestock and their progeny is no exception. Our organic consumers must be assured that the risks and unknowns around cloned livestock and their progeny, including documented negative impacts on animal health, are not a concern for them because cloned livestock and their products and progeny are clearly disallowed in organic production.

NODPA supports the Livestock Committee's recommendation to revise 205.2 Terms Defined. **However, it is imperative that progeny of clones be unequivocally disallowed as well as clones.** This is not a question to be taken up when the need arises in the future—the need is here now. Cloned bulls are in existence whose semen is destined for the artificial insemination market should the ban on cloning be lifted. Physiological differences have been seen in the progeny of clones in studies. For example:

Genomic stability and physiological assessments of live offspring sired by a bull clone, Starbuck II. Theriogenology. 2007 Jan 1;67(1):116-26. Department of Population Medicine, Ontario Veterinary College, University of Guelph, Ontario, Canada. "...progeny had lower heart rates (HR) (P=0.009), respiratory rates (RR) (P=0.007) and body temperature (P=0.03)."

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It does not matter that there is no test to determine whether an animal is derived from cloning or not. The National Organic Program is a process based program, not a test based program. As with field histories, purchased feeds, etc., we producers have to verify through our recordkeeping, affidavits, and paper trail that the organic standards process has been followed. So too will it be necessary to document that no cloned livestock or progeny are brought into a herd of organic livestock or transitioned to organic production. If the necessary documentation is not available on animals, then they will not be able to be considered for organic production.

To address the need to prohibit progeny of clones, NODPA recommends that a new entry be added to Origin of Livestock section, as noted in the underlined text below:

205.236 Origin of livestock

(b) The following are prohibited:

....

(3) Livestock, progeny of livestock, or reproductive materials derived from animals produced using animal cloning techniques (including somatic cell nuclear transfer or other asexual methods).

We thank the NOSB for attending to the cloning issue in regards to organic production and we support and we urge you to completely address the full range of concern by explicitly prohibiting the progeny of clones, as well as clones and their products, through revision of both the origin of livestock section as well as revision of terms defined.

Sincerely,



Kathie Arnold, NODPA Board member and Chair of the NODPA Policy Committee



Steve Morrison
President

Steve Morrison, President, Northeast Organic Dairy Producers Alliance