

N D P A

Northeast Organic Dairy Producers Alliance www.nodpa.com

Pasture Rules to be Revised for Organic Livestock But we don't know how

The National Organic Program (NOP) has given notice that **the regulation on pasture for organic ruminants will be revised**. You can make public comments on this important issue until **June 12th**.

The Northeast Organic Dairy Producers Alliance (NODPA), in conjunction with MODPA and WODPA, has been working with many others to secure a minimum pasture intake standard to be added to the organic regulations. Years of discussion among organic dairy producers led to the following widely supported position:

Organic dairy livestock over 6 months of age must graze on pasture during the months of the year when pasture can provide edible forage. The grazed feed must provide significant intake, at a minimum an average of 30% of the dry matter intake during the growing season, for no less than 120 days per year. This provision must be for all cows, whether dry or lactating.

Now Is Your Chance to Put in Your 2 Cents

Is it fair to compete with feedlot dairies?

Is zero to minimal pasture fair to organic dairy consumers who expect pasture as the norm?

Please write your own letter if possible; the accompanying sample letter contains some specifics. **Add** some of your own personal comments in the first part of the sample letter and sign it with your farm name, remember:

- ✓ Add a short, very personal description of your farm.
- ✓ Tell Mark Bradley how much pasture you provide on your farm and its benefits to the health of your animals and the environment.
- ✓ Mention that 4 recent surveys show that the overwhelming majority of organic dairy consumers expect that organic cows are on pasture, so a minimum standard must be put into place to ensure the fulfillment of that expectation.
- ✓ Pasture intake has scientifically been shown to be correlated with increasing the levels of healthful vitamins and essential fatty acids in milk and meat.
- ✓ Well managed pasture reduces input and energy costs.

Make Your Voice Heard

Please write your comments as a letter if at all possible by downloading the letter from the NODPA web site and send your comments to the USDA by June 12th.

Fax letters to: 202-205-7808

E-mail letters to: NOP.Livestock@usda.gov

Mail to Washington DC is not a very timely or sure thing, so fax or email is best. If you'd like the sample letter emailed to you so you can customize it, contact Ed Maltby at emaltby@comcast.net or 413-772-0444.

Please share this action alert with your circle of friends, family and colleagues.

Mark Bradley, Associate Deputy Administrator, National Organic Program
1400 Independence Ave., SW
Room 4008-So., Ag Stop 0268
Washington, DC 20250

Re: Docket TM-05-14 / Comments and Answers to ANPR Questions

Dear Mark:

(1) Is the current role of pasture in the NOP regulations adequate for dairy livestock under principles of organic livestock management and production? No, since there are operations certified for organic dairy production that provide zero to insignificant pasture for their lactating cows, it's obvious that the current regulation is not working.

(2) If the current role of pasture as it is described in the NOP regulations is not adequate, what factors should be considered to change the role of pasture within the NOP regulations? Minimum pasture intake should be required.

(3) Which parts of the NOP regulations should be changed to address the role of pasture in organic livestock management? Make the following underlined changes:

§ 205.237 Livestock feed.

(c) Ruminant livestock must graze pasture for the growing season but not less than 120 days per year. The grazed pasture must provide a significant portion of the total feed requirement but not less than 30% of the dry matter intake on an average daily basis during the growing season.

§ 205.239 (b) The producer of an organic livestock operation may provide temporary confinement for an animal because of:

(2) The animal's stage of ~~production~~ life; for ruminants this includes only:

(i) birthing;

(ii) dairy animals up to 6 months of age; or

(iii) beef animals during a final finishing stage not to exceed 120 days.

And make any other specific changes recommended by NODPA, MODPA, and WODPA. |

Sincerely: