



National Organic Coalition

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Toni Strother, Agricultural Marketing Specialist,
National Organic Program,
USDA-AMS-TMP-NOP,
Room 2646-So., Ag Stop 0268,
1400 Independence Ave., SW,
Washington, DC 20250-0268

RE: AMS-TM-06-0198

The National Organic Coalition would like to thank and support the National Organic Program for the recent “Access to Pasture Rule.” After years of uncertainty, this final rule provides the clear and specific language needed to enforce one of the central tenets of organically produced livestock—the requirement that organic livestock spend a considerable part of their lives in their natural pasture habitat and receive a significant portion of their food needs from fresh, green, growing pasture.

Access to pasture for organic ruminant animals has been a requirement of the USDA organic regulation from day one. In general, the accredited certifiers that enforce the USDA organic standards have been requiring organic livestock producers to meet this pasture standard since the inception of the program in 2002. The publication of this final rule enables the USDA’s National Organic Program to enforce consistently and fairly the requirements for access to pasture. The quantifiable data that is required by the rule will leave no doubt as to what is required within a farmer’s Organic System Plan (OSP).

We are thankful for USDA’s work in putting together a sound, commendable pasture rule clarification that eliminates all the loopholes of the past and puts controversy behind us.

With regards to Access to Pasture for ruminant slaughter stock, we commend the department for its strong stance against continual confinement of animals, and appreciate the fact that the proposed compromise will allow grain finishing. By allowing for some exemption from the 30% DMI requirement, the industry is able to satisfy the American taste for ‘marbled’ beef. We endorse this proposal with its associated requirement that grain finishing happen while these animals are also maintained on pasture, and request that you tighten up the language a bit to give

certifiers guidance on the definition of the phrase: “maintained on pasture.” We support the correction that is proposed by Humane Society of the United States, that would also tighten up the language, as below:

(d) Ruminant slaughter stock, typically grain finished, shall be maintained on pasture for each day that the finishing period corresponds with the grazing season for the geographical location. ~~Except, That, y~~ Yards, feeding pads, or feedlots may be used to provide finish feeding rations **in addition to pasture**.¹

PROPOSAL FOR ADDITIONAL GRASSFED LABEL:

Unfortunately, the allowance for finishing beef on grain leaves a perception in the marketplace that the organic label is without a verified Grassfed Label. Clearly this new rule verifies all ruminants’ rations, but without a labeling regime, Organic does not mean Grassfed. Beef producers who wish to label their product “Grassfed” are confined to a less stringent, and separately-verified (or unverified) set of labels from USDA, as well as private labels. Since certified organic farmers are used to verification of all their production practices, and this new Rule includes a verification of feed rations of each livestock herd, it would seem logical that the organic label provide for the possibility of a verified organic Grassfed label under the organic regime.

Currently, there is confusion for both producers and consumers because there are three methods in which an organic Grassfed producer could label their product Grassfed:

- 1) “USDA Process Verified” – the current verification for organic or conventional Grassfed Label, which involves unnecessary additional verification for certified organic;
- 2) No verification (if they fall within the current FSIS unverified label);
- 3) Verification under their organic certification (individual certifiers are beginning to do this).

This is a problem of an uneven playing field for organic producers who are going through extra organic certification verifications versus organic or conventional producers who choose another method, and is then obviously a problem for consumers to clearly understand what they are getting in the marketplace when they buy “Grassfed.”

¹ § 205.239(d)

(d) Ruminant slaughter stock, typically grain finished, shall be maintained on pasture for each day that the finishing period corresponds with the grazing season for the geographical location: ~~Except, That, yards, feeding pads, or feedlots may be used to provide finish feeding rations. During the finishing period, ruminant slaughter stock shall be exempt from the minimum 30 percent DMI requirement from grazing. Yards, feeding pads, or feedlots used to provide finish feeding rations shall be large enough to allow all ruminant slaughter stock occupying the yard, feeding pad, or feed lot to feed simultaneously without crowding and without competition for food. The finishing period shall not exceed one fifth (1/5) of the animal’s total life or 120 days, whichever is shorter.~~

An NOP-certified Grassfed Label would eliminate this confusion by providing only one path for the use of “Grassfed” by organic producers. It would provide the consumer with a clear and transparent Organic Grassfed label that gives assurance of independent, third-party verification of both “Grassfed” and other organic values which do not exist in other labels.

We propose that the NOP simply work out an agreement with AMS Grassfed, FSIS Grassfed (or both, if appropriate) to administer the use of the Grassfed label for organic producers. Any organic producer who wishes to use the term “Grassfed,” would need to be inspected to that label through their organic certification. This may be easily accomplished through guidance and possibly an MOU or other agreement with other agencies at USDA who are involved with the Grassfed label. This method would assure a swift movement on this proposal so it could be implemented within the same timeframe as the rest of the final Rule (i.e., by June 2011).

The National Organic Coalition again thanks the USDA NOP for its comprehensive proposal on “Access to Pasture”, and hopes that these suggestions are appropriate for final implementation of this Rule in its proposed schedule.

Sincerely,



Liana Hooded, Director

National Organic Coalition:

Beyond Pesticides
Center for Food Safety
Equal Exchange
Food & Water Watch
Maine Organic Farmers and Gardeners Association
Midwest Organic and Sustainable Education Services
National Cooperative Grocers Association
Northeast Organic Dairy Producers Alliance
Northeast Organic Farming Association, Interstate Council
Organically Grown Company
Rural Advancement Foundation International, USA
Union of Concerned Scientists