

To: Mark Bradley, NOP Associate Deputy Administrator
Re: Docket Number: TM-06-06-PR

Thank you for leaving the requirement that “once an entire, distinct herd has been converted to organic production, all dairy animals shall be under organic management from the last third of gestation” in the revised origin of livestock wording. However, that wording appears to continue to allow the importation of replacement animals that were raised on conventional feeds and practices for part of their life and leaves an opening for operations that do or did not convert an “entire, distinct herd” to claim they are not bound by the last third requirement. To close these loopholes and to make the revised wording in (i) make sense with the new wording in (2), I support the following alternate wording:

§ 205.236 Origin of livestock.

(a)***

(2) Dairy animals – conversion of herds. Milk or milk products must be from animals that have been under continuous organic management beginning no later than 1 year prior to the production of the milk or milk products that are to be sold, labeled, or represented as organic. Except that crops and forage from land, included in the organic system plan of a dairy farm, that is in the third year of organic management may be consumed by the dairy animals of the farm during the 12 month period immediately prior to the sale of organic milk and milk products.

(i) (3) Dairy animals - replacement stock. Once an operation ~~an entire distinct herd~~ has been certified for converted to organic dairy production, all dairy animals, including all young stock whether born on or brought onto the operation, shall be under organic management from the last third of gestation.

I/we have been producing organic milk since _____. We are now in transition_____.

Continuing the double standard on dairy replacements hurts my operation because_____

Name_____

Farm Name_____

Address_____