

April 20, 2016

Dr. Paul Lewis, Ph.D.
Director, Standards Division
National Organic Program
USDA-AMS-NOP
Room 2646-So., Ag Stop 0268
1400 Independence Ave., SW
Washington, D.C. 20250-0268

Dear Dr. Lewis:

The Federation of Organic Dairy Farmers (FOOD Farmers) requests an additional 30 days (to July 13th 2016) for comments on the Proposed Rule; National Organic Program; Organic Livestock and Poultry Practices. Many of the provisions are a surprise and require detailed evaluation and discussion with our members.

FOOD Farmers is the umbrella organization of the Northeast Organic Dairy Producers Alliance (NODPA), Midwest Organic Dairy Producers Alliance (MODPA) and Western Organic Dairy Producers Alliance (WODPA). NODPA, MODPA and WODPA are nonprofit 501(c)(5) corporations. Our purpose is to enable organic dairy farmers, across the United States, to maintain the sustainability of organic dairy farming; including sustainable pay price and product integrity. We are the ONLY organic dairy organizations working, within our respective regions, specifically for organic dairymen in the United States on issues such as animal welfare.

We request this extension because:

1. Livestock producers, in many parts of the country, are preparing to harvest their winter forage.
2. Planting season has begun and many farmers are either readying their fields and equipment for the new season of work, or have actually begun planting.
3. Many organic dairy farmers are of Amish and Mennonite faith, and do not have access to the Internet. Information to them and from them only occurs by mail.
4. The National Organic Standards Board (Board) is scheduled to begin meeting on April 25, 2016. Prior to each meeting, we inform and educate our members, prepare and submit comments to the Board and prepare to be active advocates at the meeting. We are fully engaged in this process at the moment and simply do not have the ability to devote our full attention to this Proposed Rule.
5. As noted above, many of the provisions are a surprise and require detailed evaluation and discussion with our members; since some provisions could threaten the viability of many organic dairy and livestock operations.

Accordingly, we submit that increased time is needed to research the issues, develop comment and answer questions posed within the Proposed Rule.

A longer comment period will benefit livestock producers and the USDA by providing the opportunity for enhanced comments which will serve to improve the scope and content of any potential final rule.

Thank you for your consideration of our request. Should you have questions, please contact Ed Maltby, Executive Director, NODPA at emaltby@comcast.net, 413-772-0444, or Richard H. Mathews, Executive Director, WODPA at rhmathews51@comcast.net, 717-457-0100.

Sincerely



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cc: Elanor Starmer, AMS Administrator