



ORGANIC FARMERS ASSOCIATION

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April 4, 2019

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, D.C. 20250

Dear Secretary Perdue,

The Organic Farmers Association, along with the undersigned organizations, is concerned that the current Origin of Livestock standards are creating unfair and inconsistent interpretations of the standards and inconsistent implementation by certifiers across the country. We respectfully ask that USDA prioritizes implementation of an Origin of Livestock Final Rule in 2019.

The current rule is inhibiting the National Organic Program's ability to provide consistent and fair enforcement; leaving our nation's organic animal standards unfair and inconsistent. **The effect of this is market instability which has resulted in an organic dairy crisis nationwide. Organic dairy farmers cannot wait for the USDA to reintroduce the Origin of Livestock rule in the format of a second proposed rule. We urge you to issue the Final Rule as soon as possible.**

The USDA has sufficient comments to make a final rule now, and we urge you to move quickly and efficiently on behalf of family farmers across the United States that need clarification on the standards so that enforcement can be fair and consistent across the country. Since the 2015 rule was issued, the organic dairy industry has not changed significantly—it has only begun to crumble with the lack of regulation clarity as certifiers have been interpreting the rule inconsistently; thus, allowing practices that were not allowed in the past. The lack of uniform interpretation of the existing standards has led to a lack of consumer confidence in the domestic organic dairy industry. We find this unacceptable and within your immediate power to rectify.

We ask that USDA fix these inequities by issuing the Origin of Livestock Final Rule within the 2019 year.

We would be happy to talk with you and your leadership within Agricultural Marketing Service more about origin of livestock and the pressing need for a final rule. We urge you to move swiftly as family organic dairy farmers are suffering because of the lack of uniform and strict enforcement. We know you share this priority for strong enforcement and integrity and look forward to hearing from you.

Sincerely,



David Colson
President, Organic Farmers Association

Supported by the following Organizations:

A Bee Organic
Baystate Organic Certifiers
California Certified Organic Farmers (CCOF)
Carolina Farm Stewardship Association
Center for Environmental Health
Center for Food Safety
Community Alliance with Family Farmers
The Cornucopia Institute
Dr. Bronner's
Dolan Family Biodynamic Farms
Ecological Farming Association
Ecology Center
Equal Exchange
FairShare CSA Coalition
Farm Aid
Friends of the Earth
Food & Water Watch
Food Democracy Now!
Green America
Hanover Co-op Food Stores
IFOAM North America
International Organic Inspectors Association
Iowa Organic Association
Kings River Produce
Lancaster Farm Fresh Co-op
The Land Connection
LSAdderson, Inc.
Maine Organic Farmers and Gardeners Association (MOFGA)
Michigan Organic Food and Farm Alliance, Inc.

Midwest Organic Dairy Producers Alliance (MODPA)
Midwest Organic and Sustainable Education Service (MOSES)
Montana Organic Association
MOSA Certified Organic
National Center for Appropriate Technology
National Family Farm Coalition
National Farmers Organization
Natural Food Certifiers Inc
Natural Grocers
National Organic Coalition
New England Farmers Union
Northeast Organic Dairy Producers Alliance (NODPA)
Northeast Organic Farming Association/Massachusetts Chapter (NOFA/Mass)
Northeast Organic Farming Association of New York (NOFA-NY)
Northeast Organic Farming Association of Rhode Island (NOFA-RI)
Northeast Organic Farming Association of Vermont (NOFA-VT)
Ohio Ecological Food and Farm Association
Oregon Tilth
Organic Advocacy
Organic Consumers Association
OFARM - Organic Farmers Agency for Relationship Marketing
Organic Pastures Dairy
PCC Community Markets
Pennsylvania Association for Sustainable Agriculture (PASA)
Pennsylvania Certified Organic (PCO)
PrimusLabs
Provender Alliance
Real Organic Project
Southern Sustainable Agriculture Working Group
Thirteen Mile Farm
Valley Organic Growers Association
Western Organic Dairy Producers Alliance (WODPA)
Wild Farm Alliance

CC: Gregory Ibach, Under Secretary for Marketing and Regulatory Programs
Jennifer Tucker, Director, National Organic Program
Honorable Collin Peterson, Chairman, House Committee on Agriculture, U.S. House of Representatives
Honorable Stacey E. Plaskett, Chairwoman, Biotechnology, Horticulture, and Research Subcommittee of the House Committee on Agriculture, U.S. House of Representatives
Honorable Pat Roberts, Chairman, Committee on Agriculture, Nutrition and Forestry, U.S. Senate