

December 2, 2019

Paul Lewis, Ph.D.
Standards Division
National Organic Program
USDA-AMS-NOP
1400 Independence Ave. SW
Room 2642-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-11-0009; NOP-11-04PR

RE: Origin of Livestock

Dear Dr. Lewis:

Thank you for this opportunity to provide comment to the USDA National Organic Program proposed rule on Origin of Livestock. The Organic Trade Association's Farmers Advisory Council **supports** the Origin of Livestock Proposed Rule and urges USDA to move expeditiously to a final rule to clarify and narrow the allowance to transition dairy animals into organic milk production as a one-time event.

The Organic Trade Association's Farmers Advisory Council is a broad coalition of organic farming organizations that provides the Association with input from small- and medium-sized organic farmers, ranchers, and growers for organic agriculture's advancement. Established in 2013, the Council gives organic farmers direct influence on the Association's policy agenda and enables the Organic Trade Association to better represent the diversity of organic producers in legislative and regulatory advocacy. Each organization appoints one producer for each 500 members it represents to serve as the voice of its organization in Council business. Through these partnerships, the Organic Trade Association's Farmers Advisory Council is one of the largest coalitions of organic farmers and organic farming organizations in the United States, representing nearly 8,000 organic livestock, grain, and specialty crop producers from most regions and production systems across the country.

All organic farmers regardless of production system, scale, or geographic location have a stake in protecting the integrity of the organic seal. The lack of regulatory specificity regarding the origin of dairy livestock has created inconsistent enforcement and economic harm to organic farmers. Rulemaking is critical to bring consistent enforcement, a level playing field to all organic dairy producers, and protect consumer trust and integrity of the organic seal.

The Organic Trade Association's Farmers Advisory Council, along with the organic industry, the National Organic Standards Board, and Congress, all agree that USDA must issue a final rule that reflects the policies contained in the original proposed rule





issued in 2015 and limits the allowance for transitioning dairy animals to organic milk production as a one-time event.

Sincerely,

CCOF, Inc.
Georgia Organics
Montana Organic Association
Oregon Tilth Certified Organic
Organic Egg Farmers of America
Organic Valley/CROPP Cooperative
Pennsylvania Certified Organic
Tilth Alliance of Washington
Western Organic Dairy Producers Alliance