



December 20, 2017

Dr. Paul Lewis
Standards Division Director, NOP
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2646-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-15-0012

RE: Organic Livestock and Poultry Practices - Withdrawal

Dear Dr. Lewis:

Thank you for this opportunity to provide comments on the USDA Agricultural Marketing Service's (AMS) proposed action to withdraw the Organic Livestock and Poultry Practices (OLPP) final rule.

The Organic Trade Association is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

The Organic Trade Association respectfully requests an extension of an additional 60 days so that all interested parties have adequate time to fully review and analyze the proposed action and provide input as appropriate. The need for an extension is supported by two substantial reasons:

- 1) The current 30-day comment period spans three major holidays observed by many companies and agencies, which involve several days of work interruption. This effectively renders the comment period far too short for effective public comment.
- 2) A 30-day comment period does not provide enough time to analyze thoroughly AMS' revised assessments of the benefits and burdens and economic justification for withdrawing the final OLPP rule. This includes time needed to adequately analyze the accompanying Regulatory Impact Analysis (PRIA), complete an economic assessment, and compile key data and feedback for submission.

The Organic Trade Association is working diligently to examine the proposed action and prepare constructive and meaningful comments. However, additional time is needed given the short 30-day comment period spanning three holidays, office closures by many in the private industry, respect for the observance of religious and traditional holidays, and the exhaustive review process necessary to adequately examine and respond to a proposed action that will have far-reaching and negative effects on the organic industry,



On behalf of our members across the supply chain and the country, the Organic Trade Association thanks AMS for its timely consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kelley Poole", is written over a light blue horizontal line.

Kelley Poole
Vice President of Government Affairs
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association