**TIPS + TALKING POINTS FOR SUBMITTING EFFECTIVE COMMENTS**

A unique comment from everyone on the Organic Livestock and Poultry Production rule is critical- especially from a stakeholder like YOU.One well-supported comment is often more influential than one thousand form letters! **You can submit your comment on the** [**Federal Register**](https://www.federalregister.gov/documents/2017/12/18/2017-27316/national-organic-program-nop-organic-livestock-and-poultry-practices-withdrawal#open-comment) **(Docket AMS-NOP-15-0012; NOP-15-06).**

* Clearly identify the action on which you are commenting
* Identify your credentials and why your comments matter
* Writing from your own point of view will make the biggest impact
* Explain how the proposal will impact you
* Be concise but support your claims (sound science and reasoning)
* This comment periods close at 11:50 eastern time on **January 17, 2018**
1. **State clearly that as an organic livestock producer or handler you oppose USDA’s action to withdraw the animal care standards final rule.**
2. Say who you are, where you are from, and share some details about your farm, ranch, or business. How has the uneven playing field that this rule aims to correct affected your business? What is the impact on producers if USDA withdraws the rule?

AUTHORITY

1. The Organic Livestock and Poultry Practices final rule represents over a decade of discussion, feedback and support from our industry and ensures that we operate on a level playing field and meet a consistent standard, regardless of operation size.
2. The move to withdraw the Organic Livestock and Poultry Practices final rule goes against all overwhelming evidence to advance animal welfare standards in organic. Out of the more than 47,000 comments the department received in the last public comment period, 99 percent were in favor of the rule becoming effective without further delay.
3. Nullifying 14 years of policymaking, and ignoring public feedback to proceed with the final rule, is indefensible. Withdrawing the final rule would damage a marketplace that is giving American farmers a profitable alternative, creating jobs, and improving the economies of our rural areas.
4. This attempt to withdraw the animal care standards was done without consultation from the National Organic Standards Board- the very group of farmers, processors, scientists, and public representatives, designated by Congress to advise USDA on organic standards. In fact, this proposed action ignores the unanimous recommendation from NOSB (April 2017) to allow the rule to become effective without delay.
5. This final rule is not new regulation. Rather, it clarifies the ***existing*** regulations which already require year-round outdoor access and adequate indoor space to allow for natural maintenance, comfort behaviors, and opportunity to exercise.
6. USDA has previously issued rules clarifying existing regulations that pertain to the care of organic livestock and poultry. In 2010, USDA finalized the “Pasture Rule” which clarified under what conditions temporary confinement of organic animals indoors was acceptable.

IMPACT

1. The organic market is dynamic and currently multiple categories including dairy and eggs are experiencing an oversupply. This is due, in part, to an uneven playing field that this rule will help to correct. This rule will not hamper the organic industry’s ability to grow in order to meet future growth in demand.
2. The final rule provides for a generous implementation timeline which respects the investments made by producers into particular poultry barn systems that may need to be modified or removed from organic production. The 5-year implementation timeline allows for full depreciation of current organic poultry barn assets.
3. The real and most pressing limiting factor on the growth of the organic poultry and livestock sector is the availability of reliable sources of organic feed grains. It is challenging for land used to grow crops to keep pace with the growth of poultry production, since the land used for organic grain production must undergo a 3-year transition period.
4. The organic standards are designed to allow for varying practices depending on region, scale etc. USDA acknowledges this in the proposal to withdraw the rule but incorrectly asserts that the current uneven playing field in organic livestock and poultry production is simply “variation” in organic production practices. On the contrary, the uneven playing field in organic livestock and poultry production is the result of varying compliance decisions made by Accredited Certifying Agents, and the clarification to the existing regulations that the final rule provides is necessary to eliminate these variations in compliance decisions.
5. The decision to become certified organic is voluntary not mandatory. If consumers lose confidence in organic it will have catastrophic impacts throughout the industry. The final rule strikes the right balance between meeting consumer expectations and the reality of commercial scale food production.

**It’s time to write your custom comment!**

I am….

I oppose USDA’s action to withdraw the animal care standards final rule because…

 **When you are finished writing your comment:**

1. **Follow this link to the** [**Federal Register**](https://www.federalregister.gov/documents/2017/12/18/2017-27316/national-organic-program-nop-organic-livestock-and-poultry-practices-withdrawal#open-comment) **(Docket # AMS-NOP-15-0012; NOP-15-06)**
2. Fill out your personal information and copy/paste your comment into the text box
3. Continue to preview your comment as it will appear on Regulations.gov.
4. Verify that you have read and understand the statements and submit your comment if everything is correct.
5. If you are successful you will receive a comment tracking number. Save it for reference.
6. Let Organic Trade Association know that you’ve filed so we stop bugging you ☺