



Northeast Organic Farming Association of Vermont

An organization of farmers, gardeners, and consumers working to promote an economically viable and ecologically sound Vermont food system

February 7, 2007

Honorable Secretary M. Johanns
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Johanns,

The Northeast Organic Farming Association of Vermont has recently learned of a October 26, 2006 letter sent to you by administrators of five of the nation's largest organic dairy processors pertaining to the proposed final rule on organic dairy pasture standards. We are writing to express our grave concerns about the recommendations put forth in that letter, as have hundreds of organic dairy producers who have contacted you and National Organic Program officials through their regional producer associations. If adopted in a final rule, we believe these recommendations would call into question the integrity of organic dairy products in the minds of consumers and, therefore, jeopardize the future growth of organic milk markets and the livelihood of organic dairy producers throughout the country.

The Northeast Organic Farming Association of Vermont (NOFA-VT) was founded in 1971 and is one of the oldest organic farming associations in the nation. Our Dairy and Livestock Technical Assistance Program is now working with almost two hundred organic and transitioning-to-organic dairies and is recognized nationally as a leader in providing direct on-farm technical assistance, technical information and education to organic dairy farmers. NOFA-VT is the parent company of Vermont Organic Farmers, LLC, Vermont's only USDA-NOP accredited certifying agent. We work closely with the Vermont Agency of Agriculture, Food and Markets; USDA's Natural Resources Conservation Service and Farm Services Agency, as well as many other state and national organizations.

As you well know, the effort to develop pasture standards that are widely practicable *and* consistent with the values and expectations of consumers of organic dairy products has been a long, thoughtful and fruitful "public conversation" involving the entire organic dairy community -- producers, processors, manufacturers, consumers and others. This process has resulted in the following widely supported proposed standard: (1) Ruminant livestock must graze pasture for the growing season *but not less than 120*



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days per year, (2) The grazed pasture must provide a significant portion of the total feed requirements *but not less than 30%* of the dry matter intake on an average daily basis during the growing season. This proposed standard has been recommended by the National Organic Standards Board to the National Organic Program as the basis for a final rule.

Together, these standards would insure that organic milk products in this country continue to enjoy the support of growing numbers of consumers who not only demand more healthful foods, but also animal production systems that are environmentally sound and pay proper regard to the natural behaviors and welfare of livestock. The general public, and organic dairy consumers in particular, are increasingly knowledgeable about the importance of grazing and other agricultural practices in this regard. Recent studies by the Center for Food Safety in Washington, D.C. and Tufts University's School of Nutritional Science and Policy have documented these and other concerns among organic dairy consumers.

It is critical that the USDA-NOP promulgate organic dairy pasture standards that unambiguously and objectively respond to these concerns. The recommendations included in the processors' letter clearly fail this test: Though a 120 day "access to pasture" requirement is endorsed, there is no measurable and objective standard proposed which would insure that grazed forages constitute a significant portion of a dairy animal's diet or time spent on pasture each day. The proposed standard -- "[that] the pasture plan maximizes feed consumption from pasture during the crop year and demonstrates an appropriate relationship, [and], maintains or improves the quality of the pasture and the health, safety and well-being of the animal" -- entirely lacks operational definition and measurable performance benchmarks. As such, it invites widely different interpretations by certifying agents, abuse by unscrupulous producers, and confusion and disparagement of organic dairy products in domestic and international marketplaces. It therefore fails to provide the uniform and reliable standard necessary to insure the integrity of organic dairy products and the confidence of consumers, without which the demand for organic dairy products will stagnate.

In contrast, a standard requiring ruminant livestock to graze pasture for the growing season *but not less than 120 days per year, and*, that grazed pasture provide a significant portion of the total feed requirements *but not less than 30%* of the dry matter intake on an average daily basis during the growing season, provides credible, objective and verifiable criteria that can be easily understood and quantified by certifiers, feed nutritionists and producers alike.

Substantial testimony given before the NOSB last year by NOFA-VT's Dairy and Livestock Technical Assistance Program farm advisors, among others, provided ample evidence that this standard, with suitable and reasonable exceptions, is appropriate,

accurate and capable of being implemented by organic dairy producers *in all regions of the country*. Compliance with the 30% requirement is easily verifiable and readily calculated on farms using measurable and available pasture production and feed records.

In recent years, we have worked with approximately one hundred organic farms in Vermont to develop proficiency in these calculations as part of their organic system planning. We would be happy to provide you and others with specific details and examples that demonstrate the workability and accuracy of these calculations.

Mr. Secretary, the remarkable growth of the organic dairy industry has provided great opportunities and benefits to many hundreds of dairy farm families, businesses and rural communities throughout the country. The potential for continued and substantial growth in this sector of the food economy is well recognized, but will only be fully realized if the number of consumers of organic dairy products continues to expand. This will require that organic dairy products maintain their valued position in the marketplace by clearly embodying a range of increasingly prevalent environmental, health and ethical values. For the reasons given above, we strongly believe that the adoption of a final rule based on the above 120day/30% standard is necessary and critical to insure the continuing vitality of the organic dairy sector and the economic security of organic dairy farmers.

We urge you to carefully consider these remarks as you develop a proposed final rule on pasture standards. We invite you to contact NOFA-VT for further information, documentation or clarification pertaining to any of the points discussed in this letter.

Respectfully,

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Executive Director
NOFA-VT

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