



ORGANIC FARMING RESEARCH FOUNDATION

Fostering the improvement and widespread adoption of organic farming.

June 9, 2017

Paul Lewis, Ph.D.
Director, Standards Division
USDA AMS-National Organic Program
1400 Independence Avenue, SW
Room 2646-South, Stop 0268
Washington, DC 20250-0268

Docket Number AMS-NOP-17-0031; NOP-1506A

RE: Organic Livestock and Poultry Practice Rule

Dear Director Lewis,

The Organic Farming Research Foundation (OFRF) supports the Organic Livestock and Poultry Practices Rule, and we strongly urge the USDA to enact the rule without changes or delay to ensure the integrity and transparency in the USDA organic seal.

The USDA National Organic Program's success, and the success of the organic industry as a whole, is built upon consistent enforcement of the USDA Organic Regulations, and a fair and level playing field for farmers and other operators. The industry-developed standard enshrined in the rule represents a significant undertaking, with strong stakeholder engagement and input from across the organic livestock and poultry industry. It reflects a multi-year process involving thousands of public comments as well as collaboration with government agencies, such as the USDA Food Safety and Inspection Service, USDA Natural Resources Conservation Service, USDA Animal Plant Health Inspection Service, the Food and Drug Administration, and the Environmental Protection Agency. This rule ensures that organic farmers and businesses meet a consistent standard, regardless of the operation size.

The organic industry has averaged double-digit growth annually over the past five years, reaching \$47 billion in consumer sales in 2016. The organic livestock and dairy sector represents over 17% of total organic sales and is the fastest-growing food segment in the industry. Consumer demand for organic products still outpaces domestic production, creating opportunities for continued expansion of our farms. The organic sector is hiring employees, adding acreage, and increasing the economic viability of rural agricultural communities throughout the country. These opportunities and successes are built on consumer support and trust.

The decision to become certified organic is voluntary, and producers enter the organic market with the understanding that the rules will evolve over time.

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The rules of certification apply to organic practices including inputs, minor ingredients allowed for use in organic standards, and production and handling standards. These clarifications and evolutions in the standards strengthen and uphold our premium position in the marketplace. It is of the utmost importance that consumers have confidence that all certified organic livestock and poultry products meet animal welfare and safety standards.

As an organization that supports organic research, we believe the rule strikes the right balance between meeting consumer expectations and the reality of commercial scale livestock and food production. In 2015, OFRF surveyed organic livestock and poultry farmers throughout the US. Results of this survey show that the implementation of clear and fair animal care and welfare standards is a major priority for organic animal producers. The USDA National Organic Program's Organic Livestock and Poultry Practices

Rule reflects a thorough and thoughtful process to meet consumer expectations, while meeting a consistent standard for all livestock producers.

Thank you for the opportunity to provide comment.