



# National Organic Coalition

December 22, 2006

Lloyd Day  
Administrator  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington D.C. 20250

Dear Administrator Day:

I am writing on behalf of the member organizations of the National Organic Coalition to reiterate our strong support for a clear, objective, and enforceable pasture standard for organic livestock.

USDA has long asserted that the pasture standard in the current organic regulations is not enforceable. Specifically, the current standard requires that ruminant livestock have access to pasture, and further requires that livestock living conditions must “accommodate the health and natural behavior of the livestock.”

The overwhelming majority of organic dairy producers in the country have taken this standard seriously and make significant investments in their operations to meet the standard. However, AMS officials have argued that the standard is not enforceable. There are some dairy operations which have taken advantage of the USDA’s lack of enforcement on this issue, and have established practices that do not allow access to pasture nor accommodate the natural behavior of the livestock. As a result, consumers and the media have begun to question the integrity of organic standards, particularly for organic milk. Not only does this have the potential to jeopardize the growth in sales of organic milk, but it undermines the investment of the majority of organic dairy producers who are both philosophically and economically invested in a strong pasture standard for organic livestock.

In order to give USDA the necessary input to update the livestock pasture requirements in the regulation, and to create a more objective and enforceable standard, organic dairy producers and their organizations from around the nation conducted countless hours of

research and dialogue about an appropriate standard. The recommendation that developed from that long and thoughtful process specifies that organic ruminants must:

- 1) be grazed for the entire growing season, but not less than 120 days; and,
- 2) receive at least 30 percent of dry matter intake, on an average daily basis during the growing season, from pasture.

In order to insure that the standard is fully enforceable, it should be instituted as a change in the rule, not as guidance.

Not only does this standard meet USDA's criteria for enforceability, but it is a reasonable minimum standard that is already met by the vast majority of organic dairy operations, who are strongly committed to this standard. We urge USDA to share that commitment.

Therefore, the member organizations of the National Organic Coalition urge you to move quickly to establish a rule based on the above-mentioned pasture standard, and to resist any pressure to institute a weaker standard.

Sincerely,

Steven D. Etko  
Legislative Coordinator

Member organizations of the National Organic Coalition:

Beyond Pesticides  
Center for Food Safety  
Food and Water Watch  
Midwest Organic and Sustainable Education Service  
National Cooperative Grocers Association  
Northeast Organic Dairy Producers Alliance  
Northeast Organic Farming Association- Interstate Policy Council  
Rural Advancement Foundation International  
Union of Concerned Scientists