WESTERN ORGANIC DAIRY PRODUCERS
ALLIANCE

2485 Notre Dame Blvd., Suite 370-162, Chico, CA 95928

Ms. Elanor Starmer July 8, 2016
Administrator
Agricultural Marketing Service
Room 3071-S, STOP 0201
Agricultural Marketing Service, USDA
1400 Independence Avenue, SW
Washington, D.C. 20250-201

Dear Administrator Starmer:

We are writing today to express our opposition to the creation of any Federal Organic Research and Promotion Program by the United States Department of Agriculture. Specifically, WODPA opposes all efforts to implement the Organic Trade Association's proposed "Generic Research and Promotion Order for Organic ("GRO Organic")."

WODPA is the ONLY organic dairy organization working specifically for organic dairymen in the Western United States. OTA does not speak on behalf of western organic dairy producers.

The Western Organic Dairy Producers Alliance (WODPA) is a nonprofit Mutual Benefit Corporation. Our purpose is to enable organic dairy farmers, situated across an extensive area in the west, to maintain the sustainability of organic dairy farming. We represent over 275 organic dairy farm families throughout the Western United States. Organic dairy production in the western states accounts for over half of the Nation's milking cows and milk production.

WODPA's membership has an official position on creation of a Federal Organic Research and Promotion Program. We are not supportive.

**Why we oppose an Organic Check-Off**

1. During our annual meetings in October 2012 and October 2015, WODPA's membership voted against the creation of an Organic Check-Off.

2. "Organic" is not a commodity, it is a system of production.

3. WODPA sees no need for a check-off. Consumer demand is good. The problem of increased competition due to processor import of dairy products cannot be addressed through a check-off. Further, the problem of cheap imported beef cannot be addressed through a check-off. To the contrary, check-offs' assess imports and promote generically.

4. A check-off will do nothing to help producers receive a sustainable price for their product. U.S. producers are experiencing lower prices for their products due to competition from imports which sell for less than the U.S. farmers can produce them.

5. Check-offs' assess a tax on farmers to fund advertising and other activities that they would not pay for voluntarily. These dollars can be put to better use on the farm.

6. Speech under a check-off is government speech and the Secretary of Agriculture has final approval authority over every word in every promotional campaign. The United States Department of Agriculture prohibits comparative promotion of agricultural products and systems of agriculture. Accordingly, speech to promote the virtues and benefits of organic will be censored, thereby, severely limiting the ability to effectively promote those virtues and benefits.

7. Check-off programs of public relations and advertising target foodservice entities and consumers. Organic does not suffer from a lack or decline in demand. Promoting organic sales will not increase organic acreage in the U.S. but will further increase demand thereby increasing lower priced organic imports. That trend will further undermine the sustainability of U.S. producers which will result in an increased loss of family farms.

8. A check-off consisting of so many individual agricultural commodities cannot equitably address all production research needs or equitably represent the interests of all those taxed.

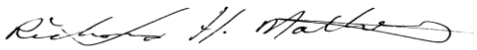
9. Check-offs are ineffective and their cost/benefit is unreasonable.

10. The percentage of the funds proposed to "administer" the Organic Check-Off is ridiculous.

WODPA's previous submission of a partial alternative proposal should not be viewed as support for an Organic Check-Off. That submission pointed out serious flaws in OTA's proposal which are continued in their amended proposal.

Should you have questions, I can be reached at 717-457-0100 or at rhmathews51@comcast.net.

Sincerely,



Richard H. Mathews
Executive Director
Western Organic Dairy Producers Alliance