

Western Organic Dairy Producers Alliance

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July 27, 2015

Mr. Scott Updike,
Agricultural Marketing Specialist,
National Organic Program,
USDA-AMS-NOP,
Room 2646-So., Ag Stop 0268,
1400 Independence Ave., SW,
Washington, DC 20250-0268.

Dear Mr. Updike:

Thank you for the opportunity to submit comments on docket number AMS-NOP-11-0009; NOP-11-04PR, Regulatory Information Number (RIN) 0581-AD08, **National Organic Program; Origin of Livestock.**

The Western Organic Dairy Producers Alliance (WODPA) hereby submits the attached comment. In preparing this comment WODPA formed an Origin of Livestock Committee to address the proposed rule, the Committee's draft comments were submitted via email to our membership for review and comment, members were also contacted by telephone to solicit feedback on the draft. Accordingly, our comments are farmer produced from the perspective of farmers. We, the farmers and our employees, are the group that will be affected the most by the final rule. We, the farmers, generate all the organic products - milk, meat and fiber - that the other stakeholders of this rule sell to support their businesses.

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 nearly 250 organic dairy farm families.

WODPA recommends that the effective date be the date of publication. Producers with animals in transition on the effective date would be allowed to complete the transition of those animals and no others.

WODPA is aware that Accredited Certifiers want a minimum 1 year implementation period. WODPA adamantly opposes that position. WODPA estimates that by that time there will be another 50,000 conventional heifers in transition.



By our calculations there are already a lot of conventional heifers in transition right now that are truly having an adverse economic impact on those farmers who raise their own organic young stock or buy last 3rd animals.

The following (conservative figures) are from our rough calculations based on what we have heard in the industry about the number of conventional animals presently transitioning to organic milk production: Washington 3,000; Oregon 8,000; Idaho 8,000; Colorado 10,000; Texas 10,000. It costs \$700 - \$800 less to raise a transition animal versus raising her organically on organic feed/pasture for 24 months. That is a \$30 Million +/- dollar loss to the organic dairymen who do not transition. Attached is a real world example.

The following issues, addressed in our comment, are vital to protecting the Integrity of the USDA Organic Seal, and helping protect the sustainability of Organic Dairymen.

1. Close the loophole which allows organic dairy producers to repeatedly transition female bovines into organic milk production an unlimited number of times.
2. Close the loophole which allows heifer ranches to purchase conventional female bovines, transition them for 12 months, and then sell as "organic animals".
3. Breeder Stock (used for Organic Beef Production) not be allowed to cycle conventional animals into and out of organic production for the sole purpose of producing an organic calf. They must be held to the same high standard as Organic Dairymen.
4. Transitioning bovines that consume 3rd year transitional crops must not be considered for organic meat, since they are not consuming a 100% Certified Organic Diet.
5. Only those animals that have completed their 12 month transition are eligible to produce a calf that can be certified organic for both milk and meat.
6. Extending the "allowable" single transition time to 18 months, in order to allow calves born early in the 12 month transition period to finish transitioning.

Thank you for your consideration of our comment. Should you have questions regarding our comment, I can be reached at 717-457-0100 or via email at rhmathews51@comcast.net.

Sincerely,



Richard H. Mathews
Executive Director