

Western Organic Dairy Producers Alliance

Executive Director
Richard Mathews
717-457-0100

December 2, 2013

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Dr. Melissa Bailey
Director
NOP Standards Division
1400 Independence Avenue, SW
Room 2648-South, Stop 0268
Washington, D.C. 20250

Dear Melissa,

The Western Organic Dairy Producers Alliance (WODPA) Board of Directors submits the enclosed recommended changes to sections 205.2 and 205.236 of the National Organic Program Regulations.

The enclosure consists of two parts: regulatory text and comments.

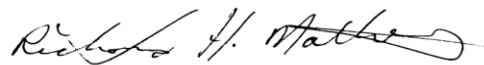
In addition to the enclosure, WODPA recommends the following final rule preamble language relative to the effective date and implementation:

DATES: *Effective Date:* This rule becomes effective [Insert date of publication].

Implementation and Compliance Dates: This rule will be fully implemented [Insert date 364 days after date of publication]. No operation certified as of the date of publication shall begin a transition of dairy animals.

I am available to discuss our recommendations at your convenience. I can be reached at 717-457-0100 or via email at rhmathews51@comcast.net. I can also come to Washington to meet with you on this matter at a time convenient to you.

Sincerely,



Richard Mathews
Executive Director