

Northeast Organic Dairy Producers Alliance

NODPA



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Ed Maltby

Martin E. O'Connor, Chief, Standardization Branch
Livestock and Seed Program, AMS, USDA
Room 2607-S
1400 Independence Avenue,
Washington, DC 20250-0254

Re: Docket No. LS-05-09

August 10, 2006

*Comments submitted by regular mail and via e-mail to
marketingclaim@usda.gov*

Dear Martin O'Conner:

The Northeast Organic Dairy Producers Alliance (NODPA) is the largest organic dairy farmer organization in the country and has a current membership of 674 organic dairy farmers. NODPA's mission is to "enable organic dairy family farmers, situated across an extensive area, to have informed discussion about matters critical to the well being of the organic dairy industry as a whole." We appreciate the opportunity to comment on the proposed grass fed standards.

NODPA is not aligned with any one processor, cooperative, breed or commodity organization and is therefore able to represent the views of many different farmers both in the northeast and across the country.

NODPA supports the figure of 99% as the grass fed standard but requests that the wording be changed from **"99% of the energy source"** to **"99% of the dry matter intake, with the exception of milk consumed prior to weaning and routine mineral and vitamin supplementation"**. Percentage of the energy source as related to animal food intake is not a commonly calculated

30 Keets Rd, Deerfield, MA 01342

email: ednodpa@comcast.net

Tel: 413-772-044

web: www.organicmilk.org

Fax: 866-554-9483

or www.nodpa.com

measure and using it will cause much confusion and will no doubt lead to various unintended interpretations on how it is to be measured. **Feed sources aren't just sources of energy or protein, but a mix of both in varying levels. If protein is fed in greater amounts than an animal needs, then the excess protein can / will be used for energy—thus exacerbating the difficulty of assessing percentage of energy source.**

The experience with the “access to pasture” wording in the National Organic Standards shows that unclear wording leads to abuse and confusion with negative marketplace implications.

The proposed 1% allowed non forage feed should be specified for inadvertent or emergency cases only, not part of the regular ration.

For consumers to receive full potential of the health benefit of grass fed that they are anticipating and to meet their innate expectation that grass fed means pasture raised, provisions must be added that the grass fed label require that animals are raised on pasture for the greatest portion of their lives and receive the majority portion of their dry matter intake from living, growing pasture rather than machine harvested forages. At the very least, the **minimum** of grazed feed intake should be 30% of the dry matter intake during the growing season but **for no less than** 120 days per year. These are parameters that have been accepted as a base grazing standard by the overwhelming majority of organic dairy producers all across the country and should be easily achievable by any producer looking to turn out a grass fed product.

We request that crops normally harvested for grain (such as corn and small grains) must be harvested or grazed when in the vegetative state (pre-grain formation) in order to be allowed as forage / grasses under this label. Otherwise, a large portion of grain in the diet could be allowed via the use of these crops in their mature state, even if the grain is not separated, i.e., the rule of thumb on corn silage is that it is 50% grain and 50% leaves and stalk.

We urge that the grass-fed label prohibit the use of genetically engineered plants / foods. Consumers interested in this label also have the expectation that the plants being eaten by the animals are natural and are not genetically modified species or varieties.

NODPA is unclear about how the standards of this grass fed label will be monitored and enforced, but it is of great importance, that like organic standards, there be adequate monitoring and enforcement to ensure the integrity of the label.

Thank you for your consideration and for your dedication and work on these issues. Please contact Ed Maltby if you need any clarification on the points we raise or any feed back from NODPA members who are working farmers selling product to many different companies.

Sincerely,

A handwritten signature in black ink that reads "Kathie Arnold". The script is cursive and fluid, with the first name "Kathie" being more prominent than the last name "Arnold".

Kathie Arnold, NODPA Board member and Chair of the NODPA Policy Committee



Steve Morrison
President