



Vermont Grass Farmers Association

c/o UVM Center for Sustainable Agriculture • 63 Carrigan Drive • Burlington, VT 05405

August 10, 2006

2006-2007 Board Members

Nat Bacon, President
Shelburne Farms, Shelburne

Mike Ghia, Vice President
Ewetopia Farm, Saxton's River

Kristan Doolan, Secretary
Does Leap Farm, Bakersfield

John Michalski, Treasurer
Taylor Farm, S. Londonderry

Kelli Fogg & Todd Shuttleworth
Westfield, VT

John Hancock
Morrisville

Bruce Hennessey
Maple Wind Farm, Huntington

Rob McLeod
East Hardwick

Rebekah Murchison
Fair Winds Farm, Brattleboro

Jesse Pomeroy
Pomeroy Farm, Weston

UVM Center for Sustainable Agriculture Staff

Jennifer Colby,
VT Pasture Network Outreach
Coordinator

Rachel Gilker,
VT Pasture Network Technical
Coordinator

Contact information

(802) 656-0858
jcolby@uvm.edu

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

Re: Docket No. LS-05-09, Grass fed marketing claim standard

Dear Mr. O'Connor,

The Vermont Grass Farmers Association is a farmer-led non profit organization furthering the management of grazing animals for the betterment of environmental conditions, encouragement of profitable farms, and production of healthy, happy animals.

We have reviewed the draft standards outlined in the Federal Register, under Docket No. LS-05-09.

We felt the proposed definition was generally good, but as a group we thought there were several areas needing clarification:

- The use of forage as an energy source should be changed to energy/feed source to avoid the supplementation of non-forage based N, such as urea treated hay.
- The proposed 1% allowed non forage feed should be specifically for inadvertent or emergency cases and not part of the regular ration.
- As the rule currently is worded, it would be possible to raise animals in confinement and feed stored forage all year. This situation totally undermines both the nutritional and environmental benefits of grass-fed. There should be a minimum

number of days required on well managed pasture. This could start at a minimum of 120 days (as it is with organic standards) and possibly be higher in different regions of the country where the grazing season is much longer.

Thank you very much for your consideration of our concerns.

Sincerely,

The Vermont Grass Farmers Association Board and Staff

"A group of farmers and neighbors growing the vitality of grass-based farming in Vermont"