



National Organic Program (NOP) – Access to Pasture (Livestock)

Training Presentation Part II



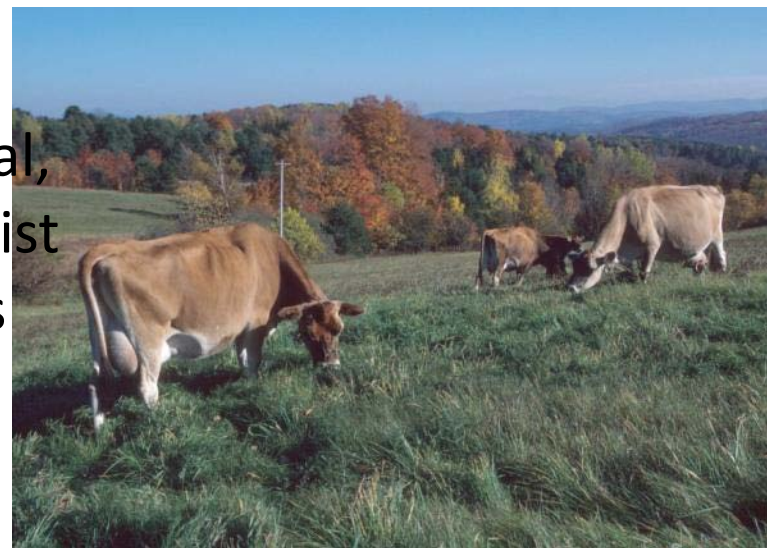
NUTRITIONAL REQUIREMENTS 7 CFR PART 205



How are Nutritional Requirements of the Animal Evaluated?

Producers will need to evaluate animals' needs and diets and observe the herd to make sure the animals' nutritional requirements are being met.

NOP encourages producers to use local, regional, and state experts, to assist in analyzing the numerous factors specific to an operation.





How are Nutritional Requirements of the Animal Evaluated?

Practical Tool – Body Condition Scores (BCS)

- BCS is closely related to body fat and energy reserves.
 - Describes the relative fatness or body condition of a cow herd through the use of a point scale.
 - More reliable indicator of nutritional status than body wt.
 - Group animals according to nutritional requirements.
- If BCS is new to you, focus on separating cows into thin, moderate (average), and fat groups .
 - With experience, connect the "look and feel" of your cows to a BCS that you can consistently determine.

§ 205.238 Livestock health care practice standard (a)(2).



Evaluation of BCS

Use visual indicators or a combination of visual and palpation of key bone structures for fat cover [backbone, ribs, hips, pinbones, tailhead, and brisket].

- Palpating cows for fatness will help refine your skill to visually assess body condition.

Record BCS

- Link to productivity and herd management (particularly nutritional management).
- Examine if management changes for a given age group is needed.

Beef Cow – BCS

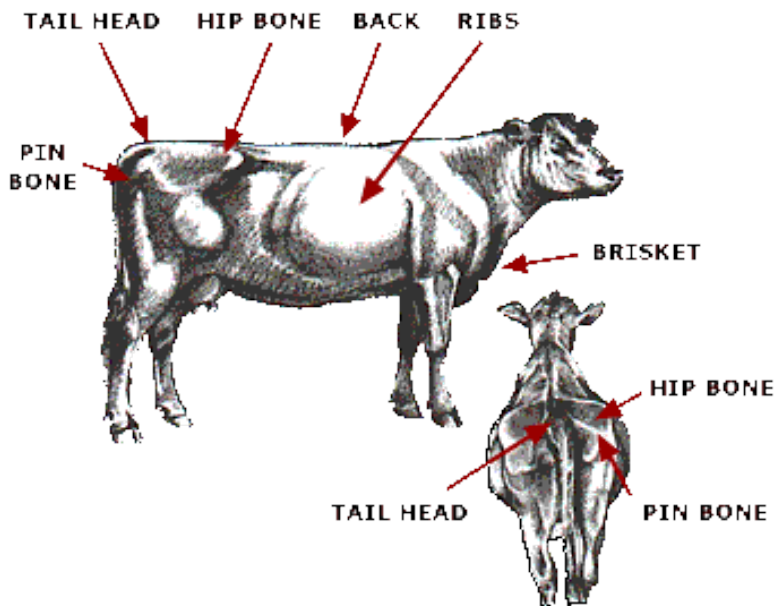
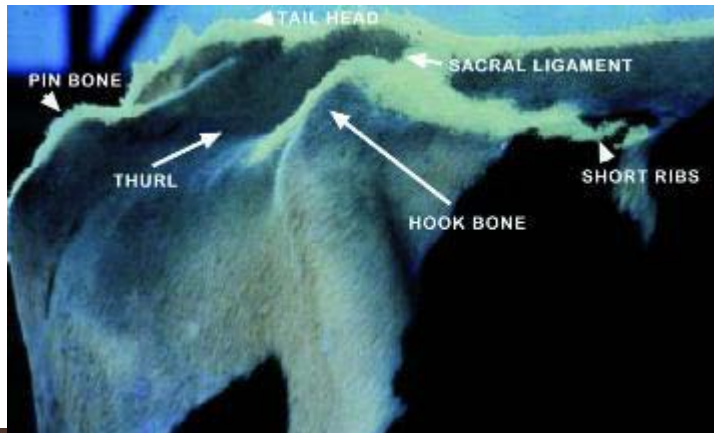
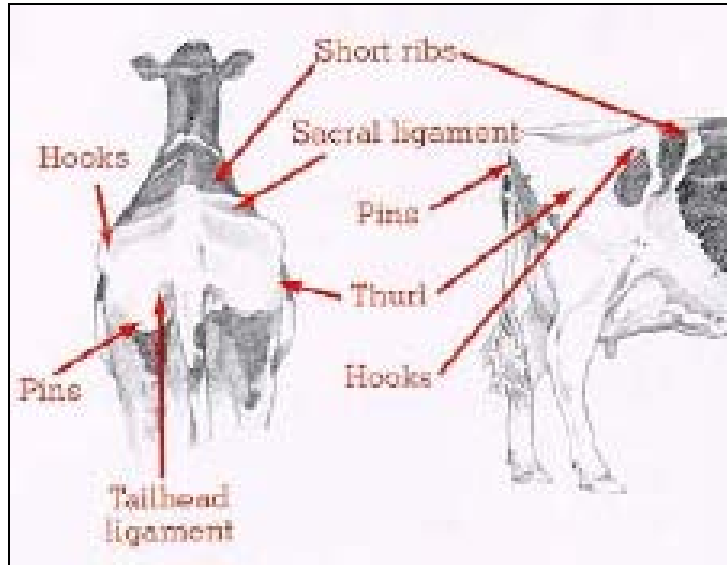


Figure – University of Nebraska – Lincoln -- [Body Condition Scoring Your Beef Cow Herd](#)

- Scale of 1 to 9
 - Score 1 is considered emaciated, 5 is moderate, and 9 is very fat.
- Score 5 is ideal for calving (Score 6 is ideal for 1st calf heifers)
- Critical times are from calving to rebreeding
- Utilize the many university resources

Dairy Cow – BCS



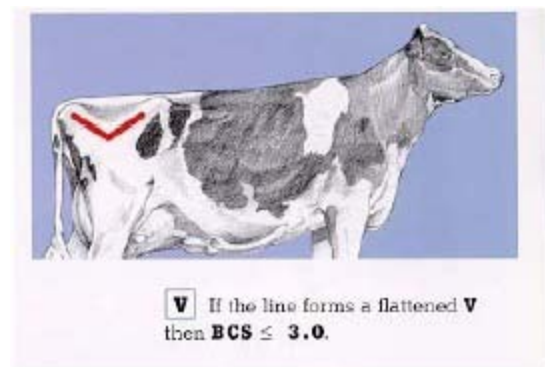
- Scale of 1 to 5; Score 1 is considered emaciated, 2 is thin, 3 is average, 4 is fat, and 5 is obese
 - Score is divided into .1 or .25 increments
- Ideal body condition is a range and is a function of stage of lactation.
 - Example: Dry cows need sufficient body reserves to support early lactation milk production when energy intake lags energy output in milk.

§ 205.238 Livestock health care practice standard (a)(2).

Dairy Cow – BCS

- [UC Davis Veterinary Medicine Extension](#)
- [UPenn Center for Animal Health and Productivity](#)
- [University of Arkansas – Publication FSA4008](#)

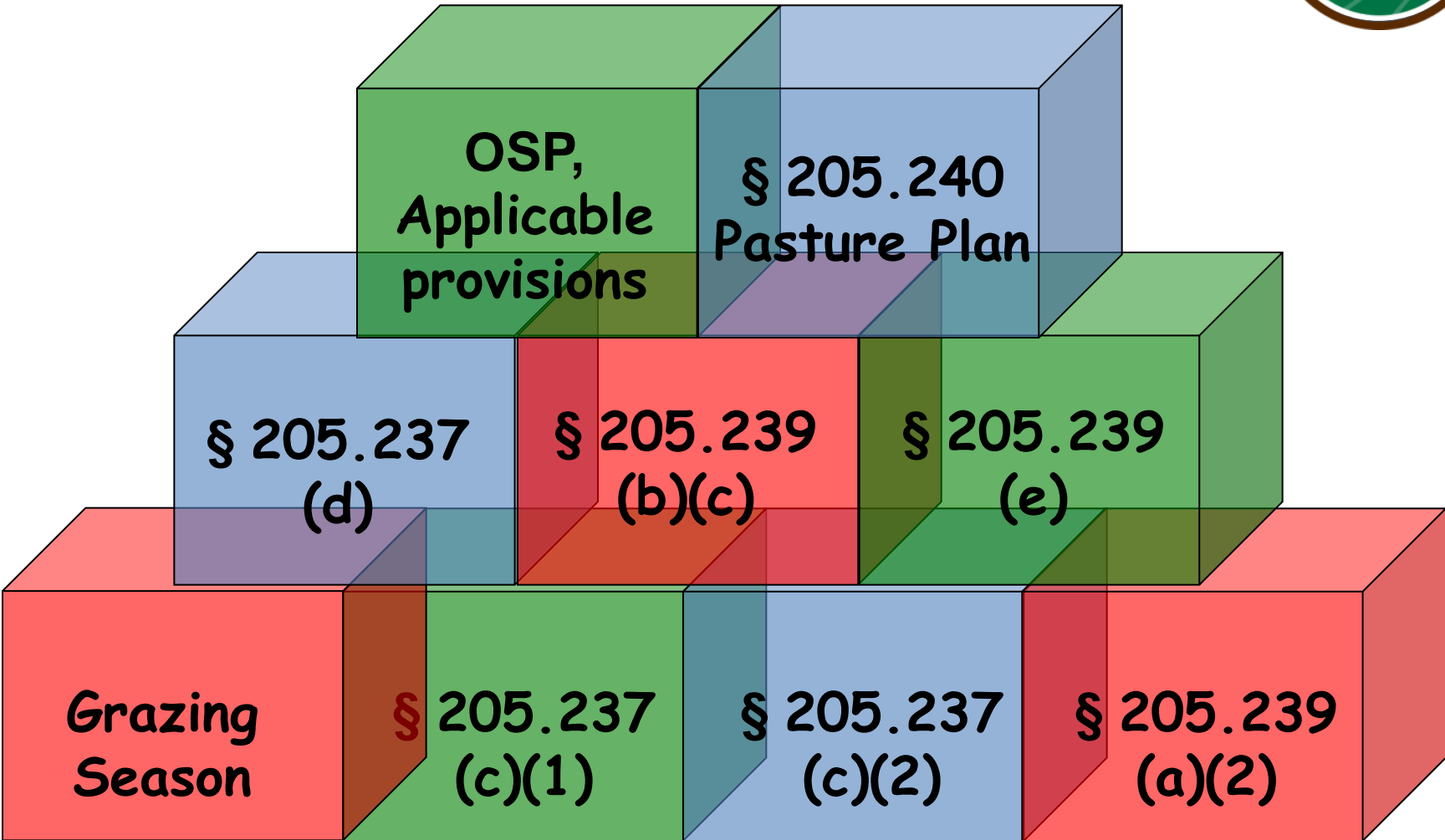
Ranges of Ideal Body Condition Scores	
Stage of Lactation	Score
Drying-off	3.5 - 4.0
Calving (older cows)	3.5 - 4.0
One-month postpartum	2.5 - 3.0
Mid-lactation	3.0
Late lactation	3.25 - 3.75
Calving (first lactation)	3.5

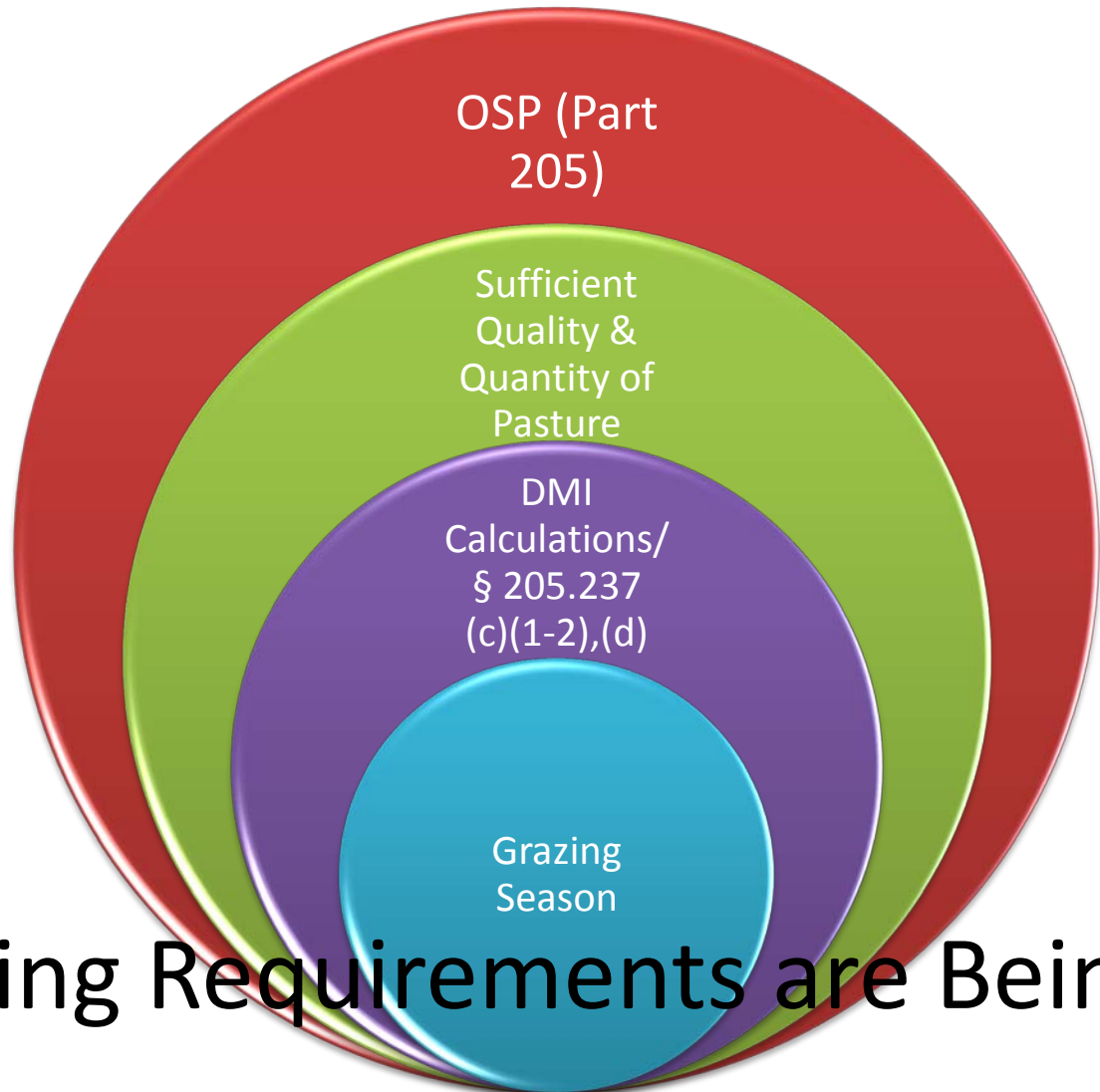


§ 205.238 Livestock health care practice standard (a)(2).

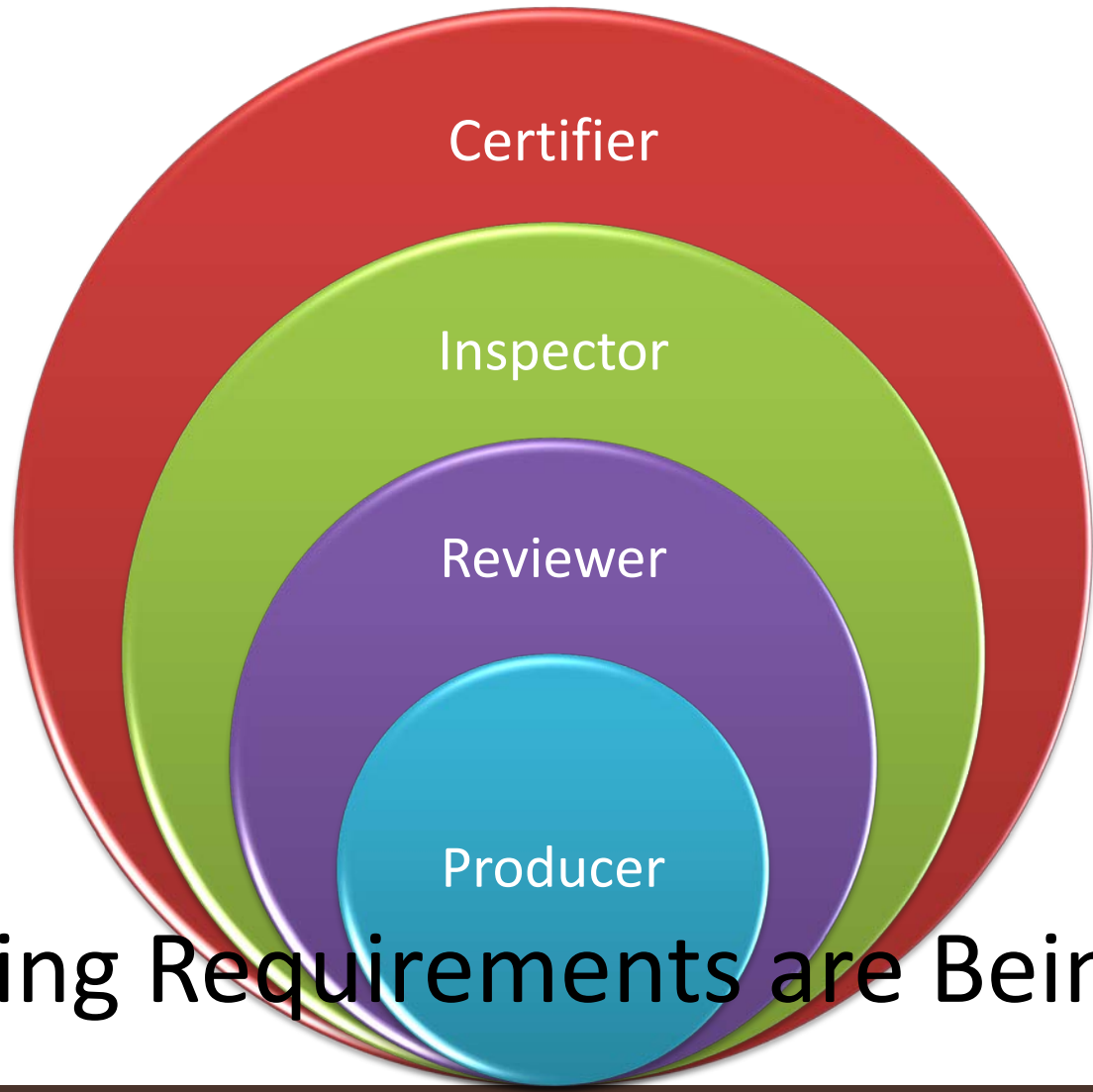


THE WHOLE PICTURE 7 CFR PART 205





Ensuring Requirements are Being Met



Ensuring Requirements are Being Met



The Role of the Producer

- Develops, writes, and implements OSP with Pasture Plan
 - Documented Quality Management System
- Develops and maintains (on-site) auditable records
 - Demonstrates compliance
 - Support OSP/Pasture Plan
 - Records deviations from Plan





OSP requirements (§ 205.201)

(a) An OSP must include:

- A description of practices and procedures to be performed;
- A list of each substance to be used as a production or handling input;
- A description of the monitoring practices and procedures to be performed (to verify that the plan is effectively implemented);
- A description of the recordkeeping system implemented;

Producer



OSP requirements (§ 205.201)

(a) An OSP must include (*cont'd*):

- A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation; and
- Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.

(b) A producer may substitute a plan prepared to meet the requirements of another Federal, State, or local government regulatory program for OSP

- *Provided*, the submitted plan meets all the requirements.





OSP requirements (§ 205.201) with Pasture Plan

- Profile/Description of operation
 - Narrative
 - Description of operation
- Inventory and origin of livestock
 - Management practices for each type and class
- Description of Record Keeping

Producer



OSP requirements (§ 205.201) with Pasture Plan

- Description of Land and Facilities including maps
 - Size (acreage and # pastures/paddocks); Description of Grazing System; Pasture management practices (ensure sufficient quality and quantity); Grazing Season; Hay, Crop production (effects on available pasture for grazing)
 - Soil fertility and seeding systems;
 - Water; Fencing; Description of erosion control and protection of wetland and riparian areas;

Producer



OSP requirements (§ 205.201) with Pasture Plan *cont'd*

- Climate/weather description and impact on living conditions
 - Contingency plan
- Feed rations, Supplements and Additives
 - Description of feeding and grazing schedule
 - Grazing Season vs. Non-Grazing Season
- Method for DMD and DMI Calculation
 - Calculated as an average over the grazing season
- Description of animal health management program (All materials and medications used; Veterinarian)





On-site Auditable Records

Records may include:

- Pasture, paddock, field activity log (management practices)
- Pasture, paddock, field input log (management practices)
- Seed and Sprig Record (Organic search record)
- Fertility/Soil Monitoring Log
- Pest/Weed Monitoring Log
- Grazing log
 - Pasture & Outdoor Access Log
- Inclement Weather Exemptions (dates, reason)





On-site Auditable Records

Records may include:

- Feed rations, changes in feed rations
 - Purchased/produced and actual amounts fed
- DMI Calculations
 - Calculated as an average over the grazing season
- Feeding/Grazing Schedule

Producer



On-site Auditable Records

Records may include:

INVENTORY AND ORIGIN

- Breed registration papers/certificates; Documentation of animals purchased and/or sold; Breeding records, including birth; USDA certification certificates of purchased animals

FEED, FEED SUPPLEMENTS, AND WATER

- Feed, feed supplement, and additive purchase records; Tear tags/ingredient labels; Feed, feed supplement, and additive certificates; Feed, feed supplement, and additive production records (if produced on farm)

Producer



On-site Auditable Records

Records may include:

HEALTH CARE AND MATERIALS

- Health records (vaccines, medications, preventative practices, etc.); Animal disease testing records; Tear tags/ingredient labels

HANDLING AND STORAGE

- Slaughter records; Product sales records; Product shipping/transport records; Post-harvest processing and handling records; Audit trail documents demonstrating product tracking, including from sale back to animal management

Producer



The Role of the Reviewer

- Ensure OSP & Pasture Plan acceptable and complete prior to onsite inspection
- Evaluating the OSP & Pasture Plan
 - DMD and DMI Calculation
 - Sufficient pasture (quantity and quality)
 - Acres, paddocks for # of animals
 - Grazing season
 - Feed Inputs

Reviewer



The Role of the Reviewer – Evaluating the OSP & Pasture Plan

- Is the grazing season 120—365 days?
 - Is the grazing season reasonable for the geographic location and the individual operation?
 - Described in pasture plan?
 - Are there conditions the producer planned for that warranted exemptions?
 - Conditions the producer planned for that warranted variances?

Reviewer



The Role of the Reviewer – Evaluating the OSP & Pasture Plan

- **How is DMD determined?**
 - Is DMD reasonable for animals' nutritional needs for maintenance and production?
 - Change with stage of production?; DMD take into account various physical (e.g., walking) and environmental issues?
- **Is the average DMI from feed $\leq 70\%$?**
 - Is the information for feed inputs (§ 205.237 (d)) sufficient in the OSP and does the information support DMI calculations?
 - Grazing season vs. non-grazing season

Reviewer



The Role of the Reviewer – Evaluating the OSP & Pasture Plan

- Is the average DMI from pasture $\geq 30\%$?
 - Does the OSP describe if animals managed on pasture and graze daily?
 - DMI calculated more than once (averaged)? Does it need to be?
 - Does the feeding schedule and grazing schedule support the DMI calculations?
 - Supplementation (other feed sources) Management
 - Type, Amount (over grazing season vs. winter), Timing
 - Time of day and amount of time (true access to support the DMI calculations?)

Reviewer



The Role of the Reviewer – Evaluating the OSP & Pasture Plan

- Is the pasture of sufficient quality and quantity?
 - Are the Pasture Standard requirements met and adequately described in the Pasture Plan?
 - Does pasture management practices and availability of forages support DMI calculations?
 - Utilize the NOP Pasture Worksheet
 - Does the pasture support the number of animals (lb of dry matter)?
 - Does hay /crop production affect pasture availability?

Reviewer



The Role of the Inspector

- Review OSP and Pasture Plan
 - prior to inspection
- Onsite evaluation – review of records, facilities, and production system
 - Compliance with OSP & Pasture Plan and with Regulations
 - Planned vs. Actual
- Detailed inspection report of findings
 - Acquire sufficient “proof”
- Exit interview
 - Potential noncompliance(s) and areas of concern

Inspector



The Role of the Inspector – On-site Evaluation

- Onsite records for grazing season (Is the grazing season 120—365 days?)
 - Pasture and Outdoor Access Logs
- Are there conditions that warranted exemptions (records)?
- Conditions that warranted variances (records)?
Approved by ACA?

Inspector



The Role of the Inspector – On-site Evaluation

- Is DMD reasonable for animals' nutritional needs for maintenance and production?
 - Changes in stage of production; various physical (e.g., walking) and environmental issues – has the diet changed accordingly?
 - Body Weights reasonable (prevent overestimation)?
- On-farm feed records
 - Amounts purchased, produced vs. amount fed
 - On-site records vs. OSP

Inspector



The Role of the Inspector – On-site Evaluation

- On-site DMD, DMI Calculations
 - Actual (on-farm) vs. Planned (OSP)
- Does the feeding schedule and grazing schedule support OSP, DMI calculations?
 - Supplementation (other feed sources) Management
 - Type, Amount (over grazing season vs. winter), Timing
 - Time of day and amount of time (true access to support the DMI calculations?)

Inspector



The Role of the Inspector – On-site Evaluation

- Is the pasture of sufficient quality and quantity? Pasture adequacy.
 - Does pasture availability support OSP, DMI calculations?
 - Pasture intake is affected by amount of forage allocated in the paddock/pasture (control height of pastures presented).
 - Vegetative state of growth (not stored/residual forage)
 - Height and Density – walk the pastures
 - Dense, palatable, high quality pasture = ↑ pasture DMI
 - Are available forages palatable, of quality?
 - Are the animals eating what is available?

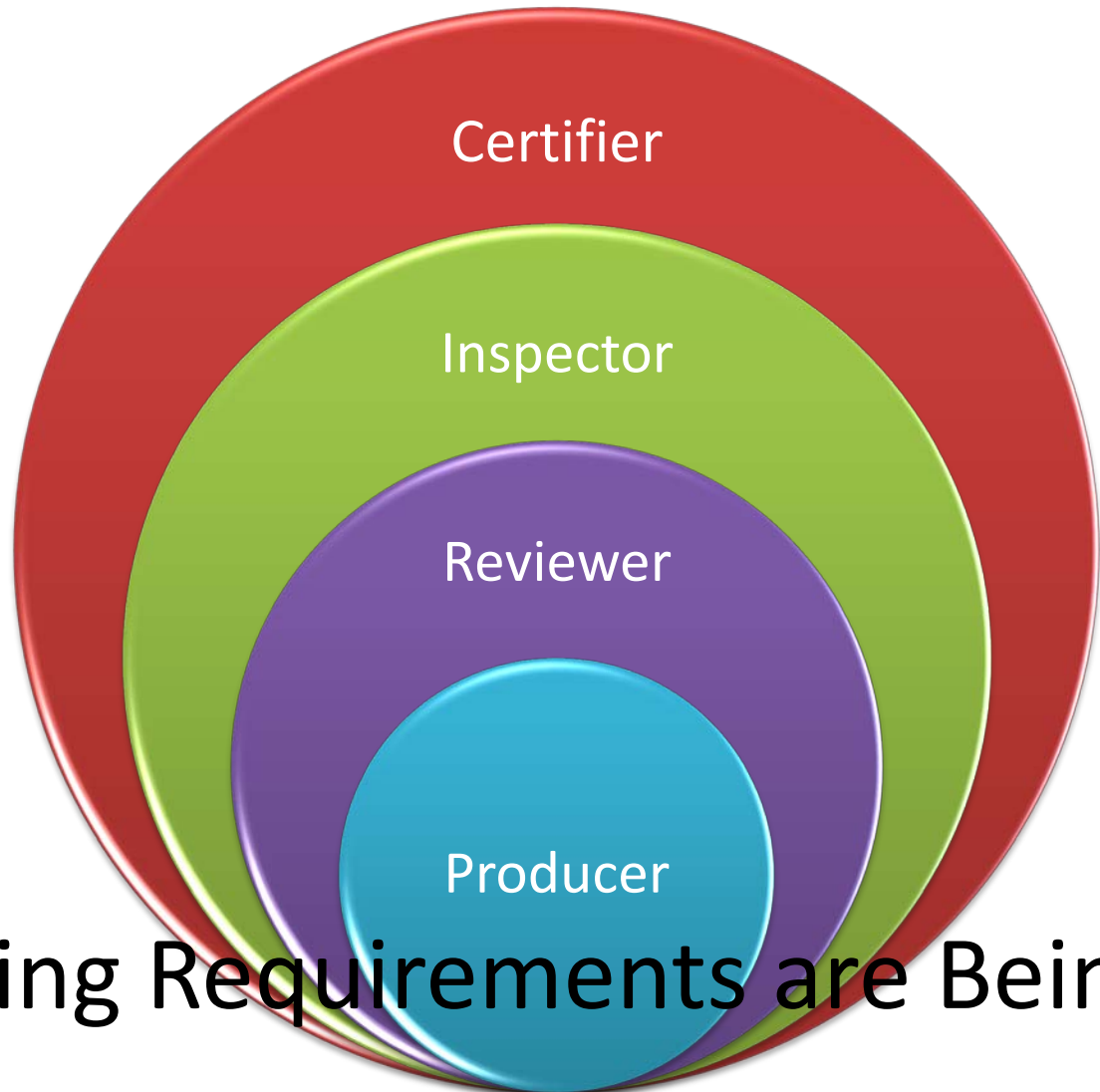
Inspector



The Role of the Certifier

- Review inspection report and make certification determination (grant or deny)
- Written notification of noncompliance
 - Violations addressed through notice of noncompliance, denial, proposed suspension, and/or proposed revocation.
- If compliant, certification granted
 - Correction of minor noncompliances (timeframe)
 - Issue certificate

Certifier



Ensuring Requirements are Being Met



CASE STUDIES
GENERAL DISCUSSION
7 CFR PART 205



Case Study 1



head = 300 head

Ave. BW = 1300 lb

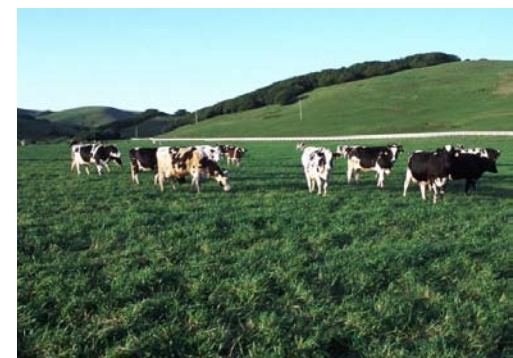


Reviewer:

- Grazing Season = 180 d (April 15 – October 15; continuous)
- Pasture DMI = 45%; DMI measured 2x
- Feed DMI = 55%; Milking/Feeding/Grazing schedule described
- Pasture worksheet indicates sufficient quantity of forage is available
- Hay production is separate from pasture land
- Pasture plan complete

Inspector:

- Feed Mgmt – smaller amounts, more frequent
- On pasture (and grazing) daily [with Records]
- Rotational grazing, dense pastures, plant height mgmt
- System compliant and consistent with OSP



Certifier: Certification granted ✓

Case Study 1



Case Study 2

head = 300 head

Ave. BW = 1300 lb





Reviewer:

- Grazing Season = 145 d (April 15 – October 15; non-continuous)
- Pasture DMI = 30%; DMI measured 1x
- Feed DMI = 70%; Vague feed input records
- No milking/feeding/grazing schedule
- Utilize continuous pasture
- Pasture worksheet indicates insufficient quantity of forage (too much hay production crops; need more acres to support DMI)

Inspector:

- No inspection scheduled; OSP & Pasture Plan incomplete

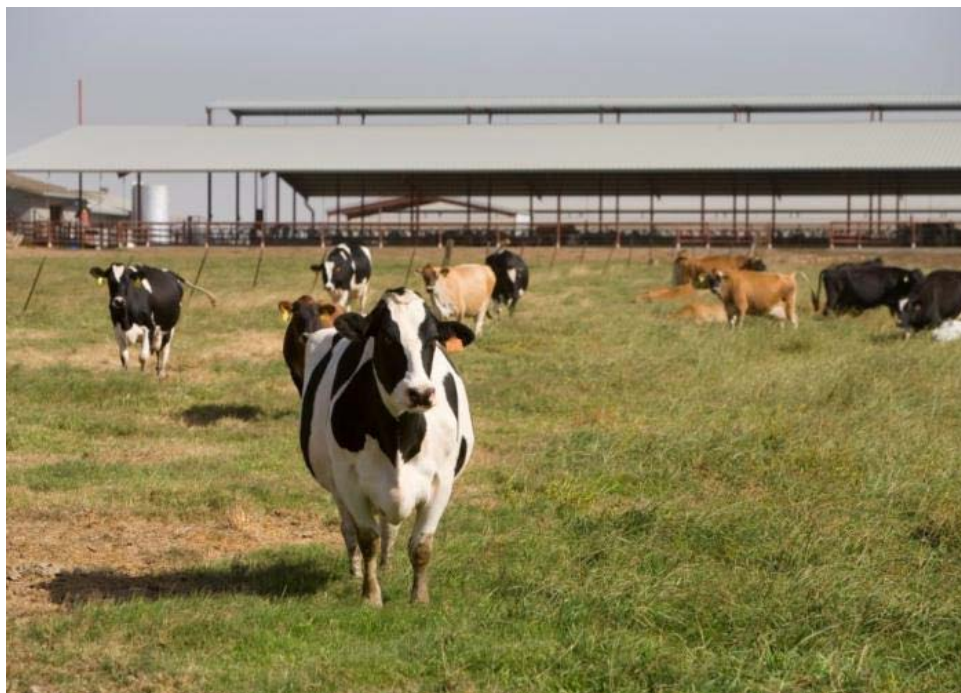




Case Study 3

head = 300 head

Ave. BW = 1300 lb





Reviewer:

- Grazing Season = 150 d (May 1 – November 1; non-continuous)
- Pasture DMI = 30%; DMI measured 2x
- Feed DMI = 70%;
- Pasture worksheet indicates sufficient acreage/quantity of forage is available; utilize rotational grazing
- Pasture plan complete – describe reasons for non-continuous grazing

Inspector:

- Inclement weather exemptions – 120 day grazing season [with records]
- Not on pasture (and grazing) daily [with Records] 105 d
- Pasture worksheet indicates insufficient quantity of forage is available (Pasture walk: sparse, dry, cracking soil, difficulty growing grasses, drought prone, no irrigation, low in soil organic matter)
- Feed records indicated more feed fed than in OSP



Certifier: Noncompliant

Case Study 3



Case Study 4



head = 300 head

Ave. BW = 1300 lb



Reviewer:

- Grazing Season = 170 d (April 15 – November 1; non-continuous)
- Pasture DMI = 40%; DMI measured 2x
- Feed DMI = 60%; Feed input records consistent with DMI
- Utilize rotational grazing; milking/feeding/grazing schedule
- Pasture plan complete

Inspector:

- No onsite grazing season, grazing log records
- State on pasture (and grazing) daily [with no records]; inclement weather issues but no records
- Only DMI calculation is in OSP, no onsite dmi records
- Feed purchase receipts indicate more feed than in OSP
- Pasture walk indicates sufficient quantity of forage but no pasture/paddock activity/input logs



Certifier: Insufficient records ☒

Case Study 4



Case Studies

- Case 1 – Compliant
- Case 2 – OSP insufficient, No inspection
- Case 3 – OSP appears sufficient, onsite inspection finds noncompliances
- Case 4 – Gray zone – Insufficient Records; Notice of Noncompliance—must address or lose certification

