

Minutes of NOSB Livestock Committee Conference Call September 5, 2001

Members: Eric Sideman (chair), Marvin Hollen, Bill Welsh, Becky Goldberg, George Siemon, Willy Lockeretz, and Dave Carter

NOP representative: Mark Keating

The Committee began by discussing public comment received in response to the draft recommendation on pasture presented at the La Crosse meeting. Members identified the proposed 120 day allowance for temporary confinement for finishing ruminants as a significant concern expressed by several commenters. Members discussed the intent of the 120 day allowance and possible alternatives, such as supplemental grain feeding of pastured livestock. Members cited the difficulty of creating a single standard for the variety of production systems and growing conditions covered by the regulation and the desire of producers to provide meat products with specific attributes. Committee members decided to revise the allowance in the draft recommendation from 120 to 90 days. Members agreed that the 90 day interval would accommodate finishing cattle and represented an allowable temporary exemption to the requirement that organically managed ruminants receive access to pasture.

The Committee discussed comments that challenged the allowance for temporarily confining young dairy stock for up to the first six months of their lives. The Committee re-affirmed the draft recommendation with the understanding that temporary confinement did not sanction the unnatural caging or penning animals. Young dairy stock temporarily confined for up to the first six months of life must have living conditions that comply with all applicable provisions of the final rule including Section 205.238(a)(4) ("conditions which allow for exercise, freedom of movement, and reduction of stress appropriate to the species") and 205.239(a) ("livestock living conditions which accommodate the health and natural behavior of animals").

The Committee discussed language in the section 2(b) of the draft recommendation stating that ruminants could be temporarily confined for "Conditions under which the health, safety, or well-being of the animal could be jeopardized". The Committee discussed one comment stating that the use of "could" was too lenient and could be used to justify temporary confinement under almost any circumstance. . The Committee agreed with the commenter that substituting the word "would" created a more substantive threshold for justifying temporary confinement.

The Committee discussed numerous comments maintaining that the draft recommendation on access to pasture was too prescriptive and would prevent certification of some dairies that, for a variety of reasons, have limited pasture resources. Members acknowledged that the diversity of operations currently certified to private standards ensured that some producers would have more difficulty complying with the requirements in the final rule than others. Members discussed the importance of establishing a clear standard for access to pasture and encouraging producers not yet in compliance to transition their operations towards that standard. Members concurred that the draft recommendation as written supported the access to pasture requirement in the final rule and agreed not to revise it.

Upon making the above mentioned changes, the Committee agreed to forward the draft recommendation on access to pasture for ruminants to the full Board.

The Committee discussed comments received on the draft recommendation on antimicrobials in vaccines and semen. The Committee re-affirmed the draft recommendation as written and agreed to forward it to the full Board. The Committee discussed developing a broader recommendation on all types of excipients used in livestock medication.

The Committee turned its attention to poultry production issues. Several members discussed information they had received on plant and aquatic animal sources of methionine in poultry rations. Members discussed the methionine content and bioavailability of these natural sources of methionine and the feasibility of including these materials in a poultry ration. Members also cited the difficulty of procuring the agricultural feed materials under consideration in certified organic form. The Committee agreed to recommend allowing methionine in the ration of organically managed poultry with the annotation that this allowance terminate in three years. The Committee recognized arguments on behalf of allowing methionine but agreed that an accelerated sunset period would push the organic community to develop preferable natural alternatives. The Committee discussed a related recommendation to allow nonorganically produced forms of agricultural products such as corn gluten meal and safflower meal to provide the methionine requirement in a poultry ration. Members supporting this recommendation agreed that the nonorganically produced agricultural products must not include products of excluded methods or exceed 5% of the total ration. Members who objected to this recommendation stated that the requirement for all agricultural materials in livestock feed to be organically produced was a milestone achievement in the final rule and resoundingly supported in public comment. These members felt that allowance for synthetic methionine sources would be preferable to allowing nonorganically produced agricultural sources. The Committee agreed to forward a recommendation to the full NOSB to add methionine to the National List as a feed additive for poultry with the annotation that the allowance would terminate in three years. The Committee agreed to provide statements of the contrasting positions on allowing nonorganically produced agricultural products for the full Board to consider..

The Committee discussed its ongoing work on the draft recommendation on the access to the outdoor requirement for poultry production. The Committee agreed to present a draft recommendation on this subject at the October meeting.

The Committee discussed the need for additional analysis on the use of chlorine in the processing of organically managed livestock products. The Committee explored the option of soliciting a Technical Advisory Panel review on chlorine use in livestock handling.

The Committee discussed its ongoing work on developing the draft recommendation on feed ingredient issues. The Committee agreed to present a draft recommendation on this subject at the October meeting.

The Committee discussed issues related to certification standards for labeling pet food products as organically produced. Members discussed the feasibility of applying the labeling provisions in the final rule for either processed products (Section 205.301) or livestock feed (Section 205.301) to pet food products. Members also discussed the existing labeling provisions for pet food products contained in the Official Publication of the American Association of Feed Control Officials. Members agreed to develop further guidance on this issue to present to the full Board.