

FINAL DAIRY REPLACEMENT NOSB Oct 20, 2002

Introduction: Organic dairy is as complex standard as any NOSB has to address. There are 2 levels of standards (much like breeder stock for slaughter stock) with one addressing how to enter organic dairy production and the other on how to bring replacement and expansion dairy animals into an existing organic dairy.

Background: The Rule 205.236(2) is confusing and conflicts with itself, the preamble, and the previous proposed rule and the present industry norm. There are 2 methods to enter organic dairy (which is fine) but as the rule stands today the interpretation is that there are different replacement standards for organic dairy depending on the method that was used to enter into organic dairy. This duplicity is not acceptable and is viewed as a mistake/technical error in the Rule. There is a clear consensus to have a unified standard for all organic dairy replacements.

A primary concern is the use of medications in young animals which is why the following proposal is meant to allow medications for young animals for the initial time period to enable any material review, any rule changes as well as giving producers time to refine calf raising skills.

Recommendation: The NOSB Livestock Committee recommends that:

On existing organic dairy farms all replacement or expansion dairy animals shall be under continuous organic management from the last third of gestation. It is recommended that until Oct 21, 2005 animals shall be under continuous organic management beginning no later than one year prior to production of the milk or milk products that are to be sold, labeled, or represented as organic.

Committee vote: 6 in favor and none against

Minority opinion: None

Conclusion: The rule is flawed and it is crucial to clarify this so as to have equitable standards for replacement dairy animals amongst organic dairy producers.