

**SUSTAINABLE AGRICULTURE COALITION
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Mark A. Bailey, Associate Deputy Administrator
Transportation & Marketing Programs
National Organic Program
1400 Independence Ave., SW, Room 4008-So.,
Washington, D.C. 20250
Comments submitted via e-mail: NOP.livestock@usda.gov

RE: Comments on National Organic Program (NOP) – Access to Pasture Livestock),
ANPR Docket No. TM-05-14 (Federal Register, vol. 71 at p. 19131, April 13, 2006).

Dear Mark Bailey:

I am submitting this letter and comments on behalf of the Sustainable Agriculture Coalition (SAC). The Coalition's member organizations include the Agriculture and Land Based Training Association, American Natural Heritage Foundation, C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture), Center for Rural Affairs, Dakota Rural Action, Delta Land and Community, Inc., Future Harvest/CASA (Chesapeake Alliance for Sustainable Agriculture), Illinois Stewardship Alliance, Innovative Farmers of Ohio, Institute for Agriculture and Trade Policy, Iowa Environmental Council, Iowa Natural Heritage Foundation, Kansas Rural Center, Kerr Center for Sustainable Agriculture, Land Stewardship Project, Michael Fields Agricultural Institute, Michigan Agricultural Stewardship Association, Midwest Organic and Sustainable Education Service (MOSES), The Minnesota Project, National Catholic Rural Life Conference, National Center for Appropriate Technology, Northern Plains Sustainable Agriculture Society, Ohio Ecological Food and Farm Association, Organic Farming Research Foundation, and the Sierra Club Agriculture Committee.

Some of our member organizations provide organic certification services. Other organizations, such as MOSES and the National Center for Appropriate Technology's ATTRA-National Sustainable Agriculture Information Service, provide information, publications, training and conferences for organic producers. In addition, many of our organizations include farmer members who are organic dairy producers. SAC's members have a direct interest in maintaining the integrity of USDA's organic label for dairy products which are produced by organic standards that meet consumers' expectations for organic animal husbandry and reward organic dairy farmers who make a good faith effort to site and design their operations to maximize the access of their animals to pasture. We appreciate the opportunity to comment on this ANPR.

Sincerely,

Martha L. Noble

Martha L. Noble, Senior Policy Associate

Sustainable Agriculture Coalition (SAC) Comments

SAC supports a clear, minimum set of standards for pasture access for organic dairy cows. We are concerned that USDA has gone too far in accepting as organic “flexible” and “site-specific” production regimes which result in total, and nearly total, confinement of lactating animals. We are particularly concerned about large-scale feedlot dairies sited in extremely arid regions of the country that have little, if any, possibility of providing lactating dairy cows with pasture access.

We agree with the position of the National Organic Standards Board (NOSB) that requiring pasture access for ruminants ensures that organic production systems provide living conditions in which animals can satisfy their natural behavior patterns, emphasize preventative measures for animal health care, and answer consumer expectations of humane animal management. Ideally, organic pasture management should reflect a synthesis of crop and livestock production principles that work from the soil up to promote an interdependent community of plants and ruminants.

We, therefore, urge USDA to adopt the clear benchmark minimum standard recommended by the NOSB that:

- * Ruminant livestock must graze pasture for the growing season but not less than 120 days per year; and

- * The grazed pasture must provide a significant portion of the total feed requirements but not less than 30% of the dry matter intake during the growing season.

SAC also endorses the comments on this ANPR submitted by the Northeast Organic Dairy Producers Alliance (NODPA) which provides comprehensive and detailed information, references, and recommendations about the pasture requirements for organic dairy cows. The comments of the Alliance were submitted in conjunction with the Midwest Organic Dairy Producers Association and the Western Organic Dairy Producers Alliance. They reflect the experience and organic production practices of hundreds of organic dairy farmers from a wide array of climate and vegetative regimes around the country.

We have a few additional recommendations with regard to the issue of pasture condition and stocking rates. The NOP regulation defines “pasture” as “land used for livestock grazing that is managed to provide feed value and maintain or improve soil, water, and vegetative resources” (7 CFR 205.2). We recommend that the NOP regulations give clear guidance to organic certifiers on measures to be considered in Organic Systems Plans to ensure that the plan for pasture access does result in maintenance or improvement of the soil, water, and vegetative resources of the pasture while also meeting the Dry Matter Intake requirement. The Natural Resources Conservation Service’s Conservation Practice Standard for Prescribed Grazing (Code 528), which is tailored to various climatic and soil regimes through the NRCS Field Office Technical Guides, could be used as a starting point for comment on conservation standards for organic pasture in proposed regulations. We note that this NRCS standard would need to be modified in the organic context to meet organic production requirements such as restrictions on pesticide and synthetic fertilizer.

Over the last few years, SAC members have worked both at the national level and with NRCS State Conservationists to increase the application of USDA conservation programs to organic production systems. These efforts include securing financial incentives within the Environmental Quality Incentives Program in many states for producers making the transition from conventional to organic production and making recommendations to dovetail the conservation planning process of the Conservation Security Program with the planning requirements for organic certification, including certification of pasture-based organic systems.

We also note with approval the increased collaboration between NRCS and the Sustainable Agriculture Research & Education (SARE) program for the SARE program to provide information and education to NRCS technical experts on sustainable and organic systems, as well as educating organic farmers and ranchers participating in SARE programs about technical and financial assistance available from NRCS to improve the conservation and environmental performance of their farms and ranches. USDA should increase support for this NRCS-SARE initiative and increase attention in USDA conservation programs to assistance for organic systems. This additional USDA support, combined with clear benchmark standards for organic pasture access and organic pasture condition, could help ensure that the organic dairy sector continues to expand to meet consumer demand for milk from organic dairy farms which meet the benchmark requirements to provide pasture access for their animals.