

**NOSB Meeting
October 18, 2006
Public Comment Period**

Thank you for the opportunity to comment. I appreciate all that the NOP and the NOSB are doing and realize that there are a lot of thankless hours that go into this process. My name is Lisa McCrory and I work as a technical advisor for the Dairy and Livestock Technical Assistance Program of the Northeast Organic Farming Association of Vermont (NOFA-VT) and have been working with certified and transitioning livestock and dairy producers for 15 years. The program provides technical support to the 126 certified organic dairy farms and the 80 farmers who are currently transitioning to organic production. NOFA-VT's Dairy and Livestock Technical Assistance advisors are very concerned about the integrity of the organic milk market due to either decisions made or lack of final decisions by the NOP in the following areas pertaining to organic dairy production. I am representing NOFA-VT today to share the following concerns:

1) NOFA-VT's Dairy and Livestock Technical Assistance advisors are concerned with the fact that the NOP did not accept the following NOSB recommended substances for use in organic livestock production: synthetic activated charcoal, calcium borogluconate, calcium propionate, kaolin pectin, mineral oil, and propylene glycol. These substances are commonly used by producers and veterinarians. For a cow with milk fever, there is no fast-acting, intravenous **alternative** treatment to calcium borogluconate and prohibiting this product makes no sense to producers and veterinarians alike. The NOP has rejected these substances not based on criteria set up by the OFPA, but instead because the FDA does not consider these substances to be animal drugs. However, the FDA does acknowledge that there are 3,000 medications that are allowed *by discretion* for livestock producers and the NOSB has recommended only six identified as such in the *Federal Register* notice and noted above. If organic producers and veterinarians are prohibiting the use of these products, they will be robbed of important tools to treat serious ailments for no other reason than bureaucratic classification.

From the on-line version of the Merck Veterinary Manual:

I. Principles of Treatment of Hypocalcemia (

<http://www.merckvetmanual.com/mvm/index.jsp?cfile=htm/bc/40413.htm>)

"The definitive treatment for hypocalcemia is to eliminate the underlying cause. Supportive measures, including the following, to restore normocalcemia can be administered pending the diagnosis.

Parenteral Calcium:

Hypocalcemic tetany or convulsions are indications for the immediate IV administration of 10% **calcium gluconate** (1.0-1.5 mL/kg), which should be slowly infused over a 10-min period. Close monitoring is mandatory; if bradycardia or shortening of the QT interval occurs, the IV infusion should be slowed or temporarily discontinued.

Once the life-threatening signs of hypocalcemia have been controlled, calcium can be added to the IV fluids and administered as a slow continuous infusion (eg, 10% **calcium gluconate**, 2.5 mL/kg every 6-8 hr). The rate of calcium administration should be adjusted as necessary to maintain a normal serum calcium concentration, and the infusion should be continued for as long as necessary to prevent recurrence of hypocalcemia. Although this continuous calcium infusion will maintain normocalcemia, its effects are short-lived; hypocalcemia will recur within hours of stopping the infusion unless other treatment is given."

2) Pasture Standard: The Pasture Standard has been under construction for more years than the NOP has been in place. As time goes on, consumer confidence for organic products - especially dairy - is starting to waiver. NOFA-VT realizes that the NOP has been incredibly busy, but if we want the organic milk market to succeed, we cannot wait any longer for a pasture standard to be finalized. This issue needs to be reconciled immediately and it needs to be implemented in support of the NOSB's recommendation, which

states that all ruminants over 6 months of age should harvest (graze) 30% of their Dry Matter needs from pasture for a minimum of 120 days per year. The NOSB recommendation also clarifies that the producer of an organic operation may provide temporary confinement for an animal because of the animal's stage of life and that the producer of an organic operation must NOT prevent dairy animals from grazing pasture during lactation.

3) Origin of Livestock: NOFA-VT believes that the allowance for conversion of non-organic dairy animals should be permitted only as a one time, whole herd transition. After the transition, all certified operations must manage their animals organically starting from the last third of gestation. Currently all of our 126 dairy farmers are abiding by this standard. The preamble to the rule clearly states that this was the intent of the law. If farms are permitted to buy in non-organic young stock or to continually transition in young stock to organic, this allows animals under 12 months of age to potentially be fed GMO feed, feed treated with hormones and antibiotics or fed slaughter by-products. This is in direct contradiction to the NOP Rule for livestock feed and health care. To clarify that the NOP rule requires that animals brought onto a certified operation must be raised organically starting from the last third of gestation would provide consistency among producers and certifiers. It would not require a significant change in management, as it is currently the practice for a large majority of organic dairy producers.

Recent headline news have indicated that cloned livestock are making it into the conventional market undetected. Allowing a continuous flow of conventional livestock to transition into the organic market will undoubtedly allow some of these livestock to infiltrate the organic system which will again have an affect on consumer confidence and ultimately their purchasing power.

4) The Dairy Animal Acquisition document under the NOP Regulations, issued October 3, 2006 has created yet another outcry from producers and certifiers alike. Where did this come from? Why did this come to be?

Once a dairy farm has completed the one-time-whole-herd-conversion, those dairy animals should be certified organic....period. We should be moving forward from their official certification date, not looking into the producers pre-certification history. This document is inconsistent and creates a system of organic standards which are difficult for organic certifiers to verify. It also allows two neighboring farms to have very different organic standards creating yet another UN-level playing field. The NOP's "clarification" that it is ok for some farms to continually raise non organic young stock and then transition them to organic creates issues with consumer confidence and allows two farms to be certified by very different standards from each other. The Dairy and Livestock Technical Assistance advisors of NOFA-VT encourage the NOP to pull this document from the NOP site and allow us to follow the policy that most certifiers have been enforcing all along; once a herd is transitioned in, all livestock are certified organic.

I thank you very much for your time,

Lisa McCrory
NOFA-VT Dairy and Livestock Technical Advisor
lmccrory@together.net
802-434-4122