

Torres, Francine

From: bbarta@mt.net
Sent: Monday, September 04, 2006 10:30 PM
To: National List
Subject: AMS proposal to allow an expanded list (below) of substances
Attachments: ATTACHMENT.TXT

Dear Mr Neal. As Karalee Bancroft Ha so well stated the obvious. I will not put it in my own words. I agreew with her so am pasting her letter to you to express my opinion. Thank Youy Bud Barta

Dear Mr. Neal:

I'm commenting on the AMS proposal to allow an expanded list (below) of substances to be used in organic livestock production.

Organic producers can ALWAYS treat an animal with anything they want, as long as they remove it from organic production and sell it through non-organic channels. Limiting the number of inputs forces organic producers to apply solid herd and pasture management techniques to keep their herds healthy, and rely on non-approved inputs only when absolutely necessary. An expanded list of "approved" inputs makes it easier to keep animals that should be culled, and rely on inputs from ailments commonly caused by overcrowding and stress (conditions which should NOT exist in organic production).

Besides, is it fair for one producer to take advantage of a whole list of inputs when others out there are trying to abide by the spirit of the OFPA by avoiding them? That sets up the whole issue of price as well. If a number of org. producers start relying on these "crutches", their cost of production goes down, bringing the pay price on organic meats down correspondingly. What does that do to the producer who's doing it all with sound management techniques and no inputs? His cost of production still remains high but he won't be able to get his price because his brother-producers are using allowable inputs. Even now without allowable "shortcuts", pay price on organic cattle isn't where it should be overall.

Based on what I've learned over the past 10 years about organic livestock production, I'd say the need for these substances is extremely remote in organic systems which practice sound organic livestock management techniques. These substances would end up being used as a crutch to prop up poor management systems, and yet another step toward that slippery slope of commodity organics. The only reason anyone is even proposing such an expansion of allowable inputs is because of the current shortage of organic meats to the marketplace. This is an effort to expand the number of animals that could qualify as "organic", and has no basis in need or consumer expectations.

Finally, do we really think that consumers want these products used on the animals they eat which are being labeled as organic? Consumers buy organic meats to avoid inputs commonly used in other production methods. It's enough that there's a gaping loophole in the standards concerning backpours already. For the organic label to mean anything in the marketplace, it has to at least come close to consumer expectations. This move would shoot honest-to-goodness organic producers in the foot. Already I'm hearing from many consumers that they no longer trust the organic label and are buying "natural" (how incredulous is that!)

An expansion of allowable substances will only encourage and mask sloppy pasture and herd management practices. Let's keep these substances out of organic livestock production and retain the existing system of removing any treated animals from organic production.

PS: RE: Atropine -- I'd like to know how an organic animal contracts organophosphate poisoning in the first place. Wouldn't that animal need to be removed from organic production anyway, whether or not it was treated with atropine? As for most of the others, I don't believe ANY substance requiring a withdrawl period, regardless of how long, should EVER be allowed in organic production.

Sincerely,

Karalee Bancroft

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