

## Livestock Recommendations -- 1998-99

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### National Organic Standards Board LIVESTOCK COMMITTEE REPORT AND ADOPTED RECOMMENDATIONS TO THE SECRETARY

Date: March 16-20, 1998  
Location: Ontario, CA

- I. Affirmation Statement of original NOSB recommendations (See attached entitled "Livestock Production Statement")**
- II. Clarification of Livestock Committee's original position concerning**

#### **Antibiotic use**

Original position: Antibiotics were an unacceptable synthetic material in organic production.

We made a distinction between slaughter stock and production stock in order to draw a parallel between animal organisms and soil organisms, recognizing that animals, like soil, can theoretically be restored to health once an unacceptable synthetic material has been used. We have not yet come to a final determination on the time normally required for such restoration with respect to various animal species. Temporarily we had set 90 days for all species. We had determined that animals slaughtered for food could never be labeled organic once an antibiotic had been used.

Since making this recommendation, several things have changed in the industry. As organic livestock producers have gained additional experience, they report that good health maintenance practices gradually eliminate the need for antibiotic use except in extremely rare instances. This suggests that antibiotic use is a transitional management issue. Secondly, the organic livestock industry has now grown to the point where replacement animals are more readily available than they were two years ago.

Accordingly, the Livestock Committee has refined its recommendation on antibiotic use, to encompass the following:

1. No animal product or animal by-product may be labeled organic once an antibiotic has been given to the animal, except as provided for production stock under the Origin of Livestock (Section 205.12).
  2. All organic livestock producers shall be required to take all necessary steps to maintain the health of their animals.
  3. Culling shall be encouraged as a herd health management tool.
  4. Antibiotics must be used to restore an animal to health when other methods acceptable to organic production fail. Thereafter, the animal cannot be used for organic production.
  5. Failure to take the necessary steps to restore a diseased animal to health shall result in decertification by the certifier.
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- I. The Livestock Committee strongly endorses the resolution of the Organic Trade Association relative to the Food Safety Inspection Service (FSIS) prohibition of labeling on organic meat, poultry, and processed eggs.**

We believe this action is long overdue and that the long-standing FSIS position, preventing the organic labeling of meat products, serves as a trade restriction and is discriminatory, since it prevents duly certified livestock producers from freely marketing their production in national and international markets.

Since non-meat products, certified organic by State and private certifiers have long been allowed in the marketplace, organic livestock producers should no longer be discriminated against, especially in the light of the long delay in getting the proposed rule finished.

Accordingly, we urge FSIS to allow meat, poultry, and processed egg products that are duly certified by a third party certifier to be labeled organic and freely traded in the marketplace.

## **I. Animal Refeeding**

The feeding of poultry and mammalian slaughter by-products to organic poultry and mammals shall be prohibited.

## **I. Clarification of Animal Husbandry**

The Livestock Committee supports the Organic Trade Association's Livestock Living Conditions and Manure Management Recommendations 1, 2, and 3, which are essentially the NOSB's original recommendations with the addition of "direct sunlight" as required as suitable to the species, the stage of production, the climate, and the environment.

1. Access to shade, shelter, fresh air, outdoors, and *direct sunlight* suitable to the species, the stage of production, the climate, and the environment;
2. Appropriate clean and dry bedding, appropriate to the husbandry system, Provided, that is, if the bedding is typically consumed by the animal species it complies with the feed standard;
3. A housing design which provides for
  - i. natural maintenance, comfort behaviors, and the opportunity to exercise;
  - ii. temperature level, ventilation, and air circulation suitable to the species;
  - iii. the reduction of potential for livestock injury; and
  - iv. free access to floor that is predominantly grass, shavings, dirt, or other non-artificial bedding

## **I. Whole Herd Dairy Conversion and Replacement Stock**

The Livestock Committee reaffirms the NOSB's 1994 Santa Fe, New Mexico Recommendation:

"Replacement dairy stock must be fed certified organic feeds and raised under organic management practices from the time such stock is brought onto a certified organic farm and for not less than the 12 month period immediately prior to the sale of milk and milk products from such stock."

Clarification of NOSB's Livestock Feed Standard recommendations section A(2); add in:

"Livestock which are part of a mixed crop/livestock operation would qualify to be certified organic at the end of the transition period".

## **VII. Wild-Caught Seafood**

Referred back to the Livestock Committee.

### **LIVESTOCK PRODUCTION STATEMENT**

The NOSB has re-affirmed its original recommendations with respect to livestock standards, and strongly urges the USDA to strictly follow these recommendations in redrafting the standards.

The NOSB has also classified its original recommendations in several key areas:

- That antibiotics are not an acceptable synthetic material and that the products from animals treated with antibiotics may not be labeled organic.
- That the feeding of poultry and mammalian slaughter by-products to organic poultry and mammals shall be prohibited.
- That animals must have access to direct sunlight and the outdoors, except the temporary circumstance of inclement weather, health care or protection of soil and water. No exceptions are allowed for large livestock concentrations.
- Replacement dairy stock and whole herd conversions must be fed organic feed for a 12-month period immediately prior to the sale of organic milk. Animals that are part of a whole farm conversion shall undergo the same 36-month transition as the farm.

The NOSB also strongly encourages the FSIS to immediately allow the labeling of properly certified organic meat, poultry and processed- egg products.