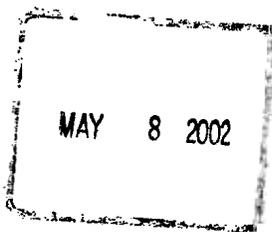


April 15 2002

National Organic Standards Board
c/o Katherine Benham
Room 4008-South Building
1400 Independence Ave., SW
Washington DC 20250-0001



To the National Organic Standards Board and members of the National Organic Program,

As a member/producer for Organic Valley CROPP Coop thank you for the opportunity to comment on the interpretation of the Dairy Animal Replacement Clause.

We believe that once an entire herd is transitioned that *all replacement animals must be managed organic from the last third of gestation.* This is undeniably the standard for Organic Meat Animals, to implement a different standard for Dairy animals is unnecessary and would damage the integrity of the program.

With proper care dairy calves can be raised quite effectively using organic practices. Setting strict standards would promote further development of infrastructure in the organic dairy industry and satisfy consumer expectations.

Respectfully,

Mary Lohmeyer

organic dairy farmer for over 30 years,

certified milk production

Rotational grazing,

April 15 2002

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c/o Katherine Benham
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Washington DC 20250-0001

MAY 8 2002

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Respectfully,

James Christensen

We milk 40 cows and have been certified organic for 1 1/2 years. We know that it is very important that animals have access to the outdoors. It allows the animals to exhibit natural behavior. The fresh grass in the diet increases conjugated Linoleic Acid and Omega-3 levels in eggs & meat. It also sets a strong humane treatment standard and its the LAW under OFPA and the NOP rule.
The pasture rules should be implemented immediately.

Hard copy has been sent.

Apr 27, 2002

National Organic Standards Board

c/o Katie Benham

Room 4008 South Building

1400 Independence Ave. SW

Washington D.C. 20250 0001

To the National Organic Standards Board and member of the National Organic Pr

My thanks to you for your diligent efforts toward the completing of the "Standard

I know that replacement dairy animals can be successfully raised organically before concept and I urge your determination to keep the present wording of all replacement animals must be managed organic from the last third of gestation the standards concerning dairy animal

I have been a producer for Organic Valley CROPP for 8 years I average 41 milking cows and use my heifer calves I have had to change my calf raising practices somewhat for organic days but that was also the case for my sons in 199 and my main herd is a hanging practice that

Again please hold the line and keep the line organic from the last third of gestation "

Respectfully

David Duerkop

David Duerkop

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Respectfully,

Mark J. Stoltz

*1865 East End Mt Rd.
Mill Hill, PA. 17751*

I strongly support this letter!

April 15 2002

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Respectfully,

Em Hower

*Organic Certified
Dairy Farmer*

Horizontal lines for additional text or signature.

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Respectfully,

J. Elric Rank

I've been organic farmer since the mid 80's. This is a good thing to have calves raised organically and it can be done.

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Respectfully,

Kristine H. Klish Kristine H. Klish

In my opinion, raising any animals
using substances not organic or natural
can and will have disastrous results.

Farmers like myself will be satisfied
and quieted when all substances that
are not natural are prohibited in all
animal practices.

April 15 2002

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Respectfully,

E3649 550 Ave,

Karen Benham + David Schmidt, Sweetbud Farm, Mendon, WI 54751

We have been producing certified organic milk and raising our herd of 32 Jersey dairy cows and 16 young dairy replacements organically as well for 6 years now. Organic farmers, cow network, learn from organic veterinarians and other resource people to apply organic raising methods. My grandparents farmed organically, so we know it can be done.

We also direct market meat and eggs to our customers, and consumers out there think that if a farm has organic cows and produces organic milk, then the whole operation is organic. They do not expect that these standards be compromised.