

PACIFIC NUTRITION – CONSULTING

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October 14, 2002

NOP, USDA
Washington, DC

NOSB Livestock Committee
Washington, DC

Subject: Public comment regarding 205.236 Origin of Livestock

Dear NOP and NOSB Livestock Committee,

I am a private consulting ruminant/dairy cattle nutritionist working primarily in California. I have worked with organic dairy farms for over 10 years and work with nearly 1,000 dairy cows under certified-organic production. In addition to a MS in dairy science nutrition and a BS in dairy science management, I grew up on a dairy farm and I have been around the dairy industry my entire life.

I am submitting this letter as public comment regarding the origin of livestock recommendations for organic certification as it pertains to ruminant animals.

1. It has been my understanding that there has always been a separation between the portions of the organic industry dealing with slaughter (slaughter animals), versus the production of milk products and animal fibers (production animals), versus poultry. Organic livestock for slaughter were raised under organic feed and management practices and were descendants of organically fed and managed breeder stock. Production animal operations, such as those in the organic dairy industry, focused mainly on assuring the animals were 100% organic regarding feeds and management practices at least one year prior to entering into milk production.

The language of the rule which combines the production and slaughter portions of the industry under the exact same set of regulations is a greater deviation from historic organic practices than if it allowed certain non-organic practices in some situations.

Moreover, the separation in the rule of these two portions of the industry would prevent a crossover of the meat from dairy cows entering the organic beef supply. Any herds desiring to function with the option of a dual-purpose market of both meat and milk would be required to utilize 100% organic feed and management from the last third of gestation as required for slaughter animals.

I recommend and support language in the rule to be changed to allow for differences in management practices in the raising of young livestock based on whether those animals are for production or slaughter.

2. The current rule seems to allow for differences in management practices in raising dairy herd replacements based on the nature of the transition to certified-organic production of the entire herd. Any difference in regulations regarding the raising of young stock based on the conditions in which the herd transitioned to certified-organic production is not practical when looking from a long-term perspective. The procedure allowing for the original transition of a herd to certified-organic production should not affect the management of the young stock in that herd in subsequent generations. How a herd is transitioned to certified-organic production today should not affect how the young stock can be raised five years in the future.

Also, in the case of expansions and mergers, it is possible for one dairy operation to have portions of their herd having gone through both possible transition options. Would they need to keep records on the maternal genetics of those young stock based on how the great-granddam was transitioned to know what management practices they had to follow to maintain that heifer's organic status? The record keeping for these situations would be unusually prohibitive and potentially impossible to maintain.

I recommend and support that the procedures for transitioning livestock and raising livestock be separated so that the procedure used in one phase has no influence over the procedure options available in the other phase.

3. Regarding the actual raising of livestock on certified-organic dairy farms, I believe the current confusion allows, or even forces, us to go back and examine the intent of the law in relation to sustainable organic dairy production operations and then to try to interpret the language within the organic rule to allow for that intent. It would seem the intent was for certified-organic dairy farms to feed organic feedstuffs, utilize organic management practices in a frame-work that allows for being able to maintain an acceptable herd size, and allow for reasonable expansion if desired. Producers should be encouraged to raise their own young stock as herd replacements. It would seem reasonable to assume that the intent is for animals under well-documented management procedures that were "mostly organic" would be preferential to undocumented animals from non-organic operations.

These assumptions can lead us to understand that it is better for organic dairy farmers to raise the offspring from their own cows as healthy replacements rather than sell those offspring to someone else. It does not seem that the intent of the rule is to force, or even encourage, farmers to sell the offspring from their own organic cows and buy non-organically raised replacements at 12 months of age. Neither should the intent be to force farmers to maintain a higher than acceptable calf mortality rate because of inadequate treatment options and then have to buy additional replacements at 12 months of age to make up for those losses.

It seems counter to the intent of organic sustainable agriculture to require organic dairy producers to sell young stock, whose mother has been under certified organic feed and management practices for a number years, fed 100% certified organic feedstuffs, and raised under acceptable organic practices almost exclusively and then, in order to maintain herd size, be forced to purchase animals from non-organic dairy operations twelve months prior to those animals coming into production. It just doesn't make sense. The wording of the current NOSB recommendation to require 100% organic from the last third of gestation and allow purchased replacements to come in 12 months prior to entering production encourages exactly these things. It encourages conditions for high calf mortality rates or selling calves at birth, and the purchasing of non-organic replacements.

Certified organic dairy operations should be encouraged in all possible and reasonable ways to raise the calves from their own organic cows as the replacements for their herd. Therefore, I support the notion that allowances should be made for certified-organic dairy farmers to have all reasonable opportunities available to them to maintain adequate health and growth of their own replacement animals.

After comparing the proposals being considered at this time, I support the OTA Livestock Committee recommendations to separate organic production livestock and organic slaughter livestock into individual entities within the rule, and to allow for therapeutic treatment of illness and injury with medications outside those on the National List from birth up to 12 months prior to the animal entering production for production livestock. Treatments must be well documented and recorded with the organic certifier.

These treatments should be recorded in the farm management plan. When possible protocols that foresee the typical and expected diseases and illnesses that are likely to occur should be established and recorded in the farm management plan in advance. The protocol, or standard operation procedure, of expected treatments for each anticipated illness should begin with procedures that are accepted organic management practices and utilize materials contained in the National list and proceed to other practices and materials to be used if necessary. These production animals should not be identified as organic slaughter animals at any time.

Further I support strong wording that the 80/20-transition exception be limited to a one-time exception per herd and only offered at the initial transition of the entire herd into organic production. Once a herd has transitioned to organic, no other animals, regardless of source or number, should be able to come into that herd without going through the full 12-month provision requirement of organic practices and certified organic feedstuffs. The only exception to this provision could be when a herd has experienced a catastrophic-type disease (or other occurrence) that eliminated a large number of animals from the herd. Examples of this could range from an outbreak of mastitis to the results of a snowstorm or other natural disasters. The exception for that herd could include a version of the 80/20 transition to allow the herd to return to their prior existing herd size.

Thank you for this opportunity to make these public comments on this very confusing but important matter.

Sincerely,
Daniel G. Giacomini, MS, PAS