Fax 202-205-7808

To: National Organic Standards Board
From: Dairy farmer and CROPP member:

David Heidel
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Re: NOSB Livestock Committee Recommendation Pasture Requirements for the National Organic Program

As a grass based dairy farmer I fully support and endorse the above recommendation. There is, however, one aspect of it that needs revision. What constitutes "significant portion of the total feed" needs to be further defined. As it stands it will allow for considerable interpretation which could possibly be no better than the present "access to pasture" and does not give adequate guidance to either farmers or certifying agencies. At a minimum it needs to be further defined as: pasture shall provide a majority of the total feed requirements during that portion of the pasture growth season known as the spring growth flush and for lactating dairy cows that could be specifically stated to be 1/2 acre per cow.

While this amount of pasture acreage is not adequate for later stages in the pasture growth season it would provide a starting point that is reasonable irrespective of the size of the dairy operation.