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Ms. Francine Torres, Administrator
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW., Room 4008-So, AG Stop 0268
Washington, D.C. 20250-0200

February 15, 2005

Ms. Torres,

I would like to express my strong support for the recommendations from the National Organic Standards Board Livestock Committee from February 1, 2005 regarding pasture requirements for the National Organic Program. As a mother and buyer of organic dairy products; I need to know the USDA organic seal represents the true meaning of "organic" which includes pasturing of animals as outlined in the new recommendation.

I deeply believe requiring pasture for animals ensures an organic system which provides living conditions that allow animals to live true to their nature, provides preventative health care benefits and most importantly answers my expectation of humane animal care.

Providing cows access to pasture assures that organic principles are being met, with an interrelated system between the animals and the land, working from the soil up to promote an interdependent community. Pasture provides benefits to cows that include improved foot and leg strength, reduced breeding problems, less stress, lower culling rates, and enhanced immunity and a happy life-something not to be discounted.

Animals utilizing pasture naturally avoid the concentration of manure issues associated with dry lot production. Allowing the cows to go to their food rather than bringing feed to the cows means less use of machinery and non-renewable resources. And, it is humane and the right thing to do.

Active management of quality pasture is an excellent way to improve soil quality. Careful rotation of pasture ensures maximum utilization of the capture of solar energy, the basis for growing all food. Allowing some pasture areas to be fallow for a portion of the season benefits biodiversity by providing habitat for grassland birds.

A recent study conducted by the Danish Institute of Agricultural Research tested milk from cows farmed organically and found that it was 50% higher in Vitamin E, 75% higher in beta carotene