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To KATHERINE BENHANA

FAX # 202 205 7808

From LARRY MIRSHTOWSKY

PHONE # 608 452 3641

TOTAL PAGES FAXED INCLUDING THIS ONE
3

NOTE I AM ALSO MAILING YOU THE
HARD COPY 2 PAGES

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,

LARRY & DONNA MIKSHOWSKY OWN AND
OPERATE OUR 90 ACRE FARM. WE HAVE
3 CHILDREN AGES 8-6-3, AND ALSO
HAVE PRIDE IN FARMING IN A TRUE ORGANIC
SITUATION. WE STRIVE TO DO OUR BEST
TO GIVE THE CONSUMER A TRUE ORGANIC PRODUCT
LET'S MAINTAIN THE REQUIREMENTS AS
THE CONSUMER WOULD BELIEVE THAT WE ARE
AND NOT TO MISLEAD ANYONE.
THANK YOU FOR YOUR TIME AND
CONSIDERATION ON SUPPORTING OUR FAMILY
FARM.
Larry Mikshowsky.

Dear Concerned People, APR 17 2002

Text of draft recommendation - 205, 236 origin of Lifestock/205, 236 b

My son & I run A organic dairy farm - 140 head - milk 60.

Letting

Farms are certifi organic - l l
in A short while. There's A lot

only about me

your children

my son Rory is

& bigger & more in

Organic farms need

farmers should stay

fall by the way side &

Small - 20-40

fs - ^{they} ~~farmers~~ The food chain changes,
close down - is dotted with small farms - 5/1000
more sure of good healthy food

let these recommendations go
ng down the tubes. There is

the world let your food be your
be your food. True

your medicine
organics are good. But polluted food with A
organic name will give us All sick children and fill
Some ones pocket for A time

Sincerely
Rory Franklin Sr.
716-322-7258

Maine Organic Milk Producers
191 Atkinson Rd.
Charleston, Me 04422



NOSB
c/o Katherine Benham
Room 4008 South Bldg
1400 Independence Ave Sw
Washington, D.C 20250 0001

20250 0001



The draft recommendation for replacement dairy animals allows for heifers of any age to be brought onto an organic dairy from any conventional operation so long as the animals are managed organically for the year prior to beginning production. Since dairy cows do not normally begin milk production before 2 years of age, the above recommendation encourages the purchase of yearling dairy heifers over the raising of farm born calves. An age limit for off farm calves of 5 days or 2 weeks old would reduce the competitive disadvantage against those farms who raise their own calves, while allowing the supply of conventionally born calves necessary for growth in organic milk production. Dairy calves can be weaned at 2 months of age. A recommendation allowing the purchase of non-organic replacements at or near this age promotes a program of sell/buy over a program of on farm organic calf raising.

A national organic standard which allows significantly weaker management practices for certified organic milk than for organic beef may reduce consumer confidence in the organic label. The grounds for allowing conventional yearlings into organic production are more economic than practical. We propose that all calves be raised organically from the last three months of gestation except for those cases where organic replacement are not commercially available. Only then should conventional animals be considered and these should be managed organically after the first 2 weeks (of age?)

We support the above proposal.

*Ayn Wilson
Carol Insueti*

*White Orchard Farm
Frankfort ME 04438
Certified Organic Dairy Products*

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The organic standards must not be weakened or we run the risk of losing creditability with people who consume organic products. They pay a considerable premium for organic milk products and their trust must not be compromised.

Thank you

Henry Perkins

Box 156 Boz Rd

Albion Me.

04910

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I support the proposal as long as no loopholes are allowed for buying in conventional heifers. If any loopholes are allowed then I would prefer to have heifers raised organically from 12 mos on organically

Doug Hantke
Hant to Hant Farm
16 Duck Pond Ln
Albion ME 04810

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I support this proposal. I feel this will bring more creditability to organic farming

Frohlich Farms

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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,

Please have ~~strict~~ standards for organic livestock, this will produce a better product and make it an even playing field for all farmers large or small.

Mike Tully
5,4148 Lunt Rd.
Genoa, VT 54632