

From: Jim (038) Rebecca Goodman [r.j.goodman@mwt.net]
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To: Livestock, NOSB
Cc: NOP, Webmaster
Subject: dairy replacements

I would strongly recommend that the proposed language in the National Organic Program Rule allowing certified dairy herds to purchase non-organic yearlings be eliminated. Further, I would recommend adoption of language requiring all replacement stock to be raised organically from the last third of gestation. At a minimum purchase of animals from non-organic sources should be disallowed beyond the age of two weeks.

It is critical that organic agriculture be practiced as a complete system of farming. Organic livestock farming should include the rearing of replacement stock from birth in an organic manner. Allowing the purchase of non-organic stock would give advantage to large commercial organic herds at the expense of smaller family type operations that strive to maintain a closed herd. This is the optimal system as defined by private certification agencies since their inception.

Respectfully submitted,

James P. Goodman
E103 Cty. Hwy. Q
Wonewoc WI 53968
r.j.goodman@mwt.net