

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, *Margaret and Bill McKeely*
24910 Matson Rd, Black River Falls, WI 54615

*We were certified organic under OCAP in 1997. With our 2
sons we farm organically 800-900 acres, owned & rented.
We have approximately 100 head of dairy animals - Cows,
Heifers & Calves. We have no problems raising our own
replacement animals. We are diligent and conscientious
in our dairy operation and oppose lowering the standards
organic "pioneers" sacrificed to put in place for
those of us who followed their lead.*

Thank you

T & D WILLEY FARMS
Potatoes, Eggplant, Basil, Winter Roots & Greens
ORGANICALLY GROWN

MAY 8

25 April, 2002

National Organic Standards Board
1400 Independence Ave. SW
Washington, D.C. 20250-0001

Dear Sirs and Madams,

Many of us do not care for the environmental impact of confinement animal operations. As a farmer, I object to their economical and social destruction as well. It is abhorrent to me that the controllers and beneficiaries of these operations could impose a powerful influence over your board that resulted in a weakening of organic standards.

Implementation of the pasture requirements for both poultry and dairy herds must not be delayed. All dairy animals over the age of six months of age should receive a substantial portion of their dry matter needs from pasture. Poultry flocks must have access to the outdoors as written in your current standards.

We know instinctively that these provisions represent, at the very least, a humane treatment standard that allows animals to exhibit natural behavior. We know scientifically that a fresh grass diet increases Omega-3 levels in eggs and meat. We know that fresh grass increases the vitamin A/Beta Carotene levels in both eggs and milk.

We know that your board has worked long and hard to write serious organic standards that have become the rule of law. I urge to stand behind and strengthen those standards now. Organic producers and consumers require nothing less.

Sincerely,



Denesse Willey



Tom & Denesse Willey • 13886 Road 20, Madera, CA 93637-9222 • (559) 673-9058 • fax (559) 674-8110



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MAY 8

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Respectfully,

Daniel Pearson

Organic Grazing Dairy Farmer milking over 75 Cows
on 160 acres pasture with young stock

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MAY 2

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Respectfully, *Michael Matrig*, 20074, Timber Ave
Creese Iowa, 52136

*I am a fifth generation farmer here in north east Iowa
on 420 acres we raise organic crops, Pork, Beef, Poultry
I believe that to maintain the integrity of the program
that the rule should read that all replacement animals
must be managed as organic the last third of gestation.
Also the benefits of outdoor access are many:
Fresh grass in the diet increases Conjugated Linoleic Acid & Omega
-3 levels in both eggs & meat, allows natural animal behavior.
It sets a strong humane treatment standard & It's
the law under OFPA and the NOP Rule.*

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Respectfully, *Steven K Otte*

PS: I would like to add that we became certified in May 2000 for land and all Dairy animals we started rotational grazing in May 2001 we have seen a huge increase in animal health when started grazing on pastures. The cows are more content and much healthier.

We farmed ~~with~~ with chemicals and antibiotics since 1985 and seemed like we never got any where now we feel great about farming and organics it holds a future! We took ground that was steep and hilly and farmed to covered with grass and cows grazing it, no erosion No chemicals NO run off with water.

*Thank you
Steven K Otte*

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Respectfully,



Randy Stein
N22175 Cty. Rd. D
Ettuck, WI 54627

This is truly the position that we all need to hold.

I feel that as far as dairy animals, that after 6 months old, ~~that~~ when possible, they need to be out on pasture. It's nature's way & organic way.

Thanks.

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Respectfully,

I AGREE WITH YOU 100%. I DO NOT
BELIEVE IT WILL HELP OUR MARKET AT
ALL TO ALLOW US TO BUY OR RAISE CALVES
NONE ORGANIC !

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Respectfully,

I as a Organic dairy farmer feel we do not need the Dairy Animal Replacement Clause.

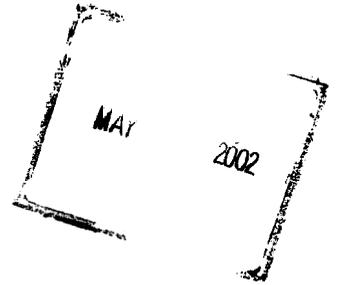
#1 If I need a replacement there are other organic producer where I can buy from, and if someone else in organics have extra we need to go there first.

#2 In the 15 yrs of selling organic milk and raising my calves and heifers on organic feed, I had only 1 case where I lose 1 heifer calf.

Benuel M Stottely
648 Cambridge Rd
Honey Brook Pa. 19344

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Cows Heifer

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Respectfully,

Since 1987 I started raising in Organic Dairy milk I didn't need to buy heifers, so I don't think we need that Clause, just raise your own, or buy from organic herds. On our farm we enjoy Organics. There may be times when someone need to buy a Heifer or two, but there is enough organic herds around. Thank you

*Aaron E. Stoltfus
5809 Limeville Rd.
Gap Pa. 17527
(717) 442-8745*

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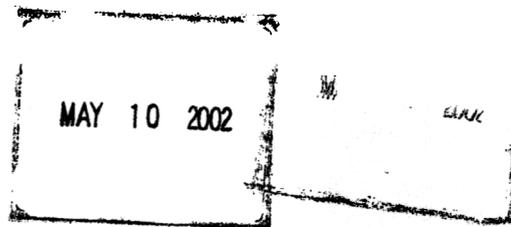
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Respectfully,

We have been organic dairy farmers since spring 2000, being part of the initial Vermont pact with CROPP Cooperative/Organic Valley. We milk 35 cows and farm 145 acres. We believe strongly in the benefits of intensively managed pasture and we believe that at least 50% of dry matter intake should come from grazing during the grazing season. We also support our cooperative's stance supporting replacement animals being organically managed from the last 1/3 of gestation. We believe this provides a consistent standard that is unconfusing to our consumer constituency. In conventional herds where dry cow treatment is used, requiring a 72hr - 5 day withholding time, it seems impossible to guarantee that a newborn calf from a conventionally managed mother would not have access to some antibiotic residues.

Thanks for the opportunity to express our opinions.

Brent + Regina Bendler
Randolph Center, VT

