

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,

*(Milk animals crops) I do agree with the above statements. I've been organic since 1992, raise all my own replacement animals. It's not that hard to do. I would rather see a strict adherence to the set rules in place. I believe it's easier for the public to understand onset of rules for everyone.*

*Thank you for taking the time*

*Robert Plone  
Stanley WI 54268  
any questions,  
715 644 2743*

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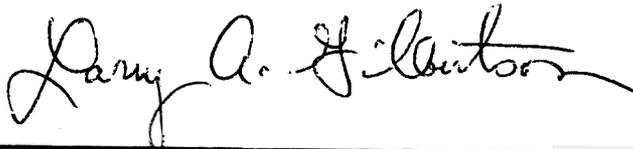


To the National Organic Standards Board and members of the National Organic Program,

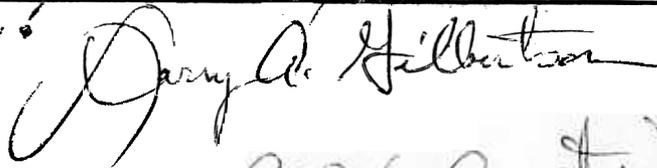
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With proper care dairy calves can be raised quite effectively using organic practices. Setting strict standards would promote further development of infrastructure in the organic dairy industry and satisfy consumer expectations.

Respectfully, 

I farm a small 40 cow organic dairy. There is no problem raising replacements for the herd. I even have extras. Cows stay around longer in the healthy organic system which makes even less the need to allow non organic cattle into an organic farm. Letting non organic raised replacements in degrades the work of those who uphold the organic trust the consumer is looking for and paying for. The ones served by this are farms wishing to bid, e, d just for the buck. Little regard is given the integrity of organic food. Once a herd is transitional, all animals must be raised organically.



9234 County B  
Marshfield, WI  
54449



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To the National Organic Standards Board and members of the National Organic Pro

I wish to comment on the interpretation of the  
Dairy Animal Replacement Cause

I am farming for 30 years and switch organic  
Dairy farming is my primary Enterprise

I believe that once an entire herd is transitioned  
that all replacement animals must be managed organic  
from the last third of gestation. Anything less is not  
acceptable.

Setting strict standard would promote further  
development of infrastructure in the organic industry and  
satisfy consumer expectation

Respectfully

Lester S. Mark

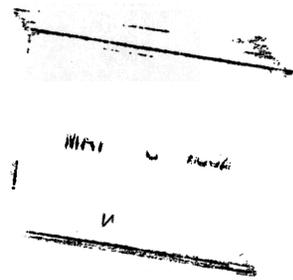
LESTER & SUSAN MARK  
N16263 CTY HWY 7  
WITHEE WI 54498  
715-229-4555







April 26, 2002



Richard Mathews, Program Manager  
USDA-AMS-TMP-NOP  
Room 4008-South Building  
1400 and Independence Avenue, SW  
Washington, DC 20250-0020

Dear Sir and NOSB Members:

I don't see how you could even consider "factory" chickens to be organic?!!

Factory farm chickens are treated inhumanely – forced to live in confined space, forced molting, forced to live with dead chickens and pumped full of antibiotics! They are treated as a piece of equipment, not one of God's living creatures.

"Organic" birds would be raised in an environmentally sustainable manner, without the use of antibiotics. They would be pastured on green grass and eat insects.

Why do the industrial poultry producers have a representative on the livestock committee at NOSB and pastured poultry farmers do not?

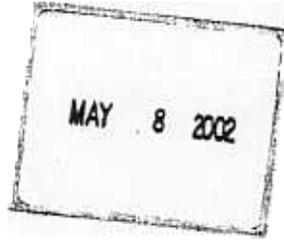
Factory raised poultry is not acceptable as an organic product.

Sincerely,

Dortha J. Weller  
8559 Road 20  
Cloverdale, Ohio 45827

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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, Aaron & Hoover

We have been farming organic since 1994 and raising our replacements on all organic we milk about 25 cows.

I think it is very important that all our replacement animals are raised organic from the last third of gestation

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Respectfully,

He, We have sold organic milk to Cropp for <sup>Four</sup>~~Seven~~ years  
from our 40 cow herd and we raise our all our own replacement  
animals using only organic MOA standards. We promote that  
all animals for organic shall be raised at least the last third of  
gestation under the organic standard and we promote that when  
ever possible that all animals be raised on grass pasture.

Thank you.

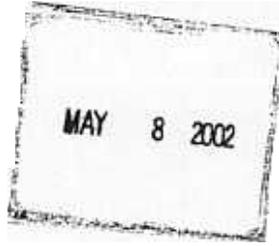
Phares Eberly



Fourleaf Clover Farm  
Phares and Ella Eberly  
W6603 Bruckschlager Rd.  
Withee WI 54498-8748

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Respectfully,

*Marta + Louie W*

*2291 571 Ave*

*Groton MA 01731*

*507-874-6270*

*Organic Farmer for 12 year*

*Organic Dairy for 8 year*

















































