

**NOFA-VT's Origin of Livestock Position Statement
For the NOSB**

October 14, 2002

The Northeast Organic Farming Association of Vermont (NOFA-VT) and Vermont Organic Farmers (VOF), representing 55 certified organic dairy producers, would like to present the following feedback to the NOSB based on the NOSB Livestock Committee's Draft Recommendation for Origin of Livestock:

Regarding the purchase of dairy replacement animals for a certified dairy farm:

- We do not agree that replacements from any source should be allowed up to one year prior to milking (without a commercial availability requirement).
- We believe the NOSB recommendation should read as follows:

"205.236 (b) the producer of an organically managed dairy may add to the herd by introducing:

(1) A replacement dairy animal born on an organically managed operation that has been organically managed from the last third of gestation, or;

(2) When a replacement dairy animal in compliance with §205.236(b)(1) is not commercially available, a producer may add a replacement dairy animal brought from an off-farm source that has been under continuous organic management upon entry to the organic operation for no less than one year prior to the production of milk or milk products that are to be sold, labeled, or represented as organic."

It is NOFA-VT's opinion that there must be a requirement that the replacements be from an organic source if commercially available. The Final Rule dictates for almost every other production area, that organic inputs (seeds, planting stock, ingredients for processed products) should be chosen over non-organic if they are commercially available. This insures that the integrity of the organic product is maintained to the highest degree that is currently commercially possible. It also ensures that the organic system will become more of a "closed loop", not relying on conventional practices, as the industry develops. If the commercial availability requirement is not added, we would support the addition of either of the following conditions:

"Routine purchase of replacement stock raised under non-organic management is prohibited."

Or

"The purchase of replacement stock raised under non-organic management should be limited to no more than 10% of the herd size per year."