

From: Lisa McCrory [lmccrory@together.net]
Sent: Wednesday, October 16, 2002 9:00 AM
To: ota_occ@topica.com%INTER2
Cc: Livestock, NOSB; Benham, Katherine
Subject: Re: OTA OCC List: Origin of Livestock comment

Leslie -

Thank you for your thorough, well written position on Origin of Livestock. I think that a phase out period of time is important and was personally thinking 3 years as being the magic number, but other than that, PCO's position and reasoning behind it is excellent. I would encourage the NOSB to determine a fixed period of time and not use "reasonable time" when determining how long producers would have to comply with this standard.

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> Conclusion
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> PCO supports the NOSB Livestock Committee's recommendation on
> interpretation of Section 205.236 Origin of Livestock with the
> addition of the following
> language:
> "The committee anticipates that producers and certification agents will work
> within their organic systems plan to meet this requirement within a
> reasonable time, depending on the constraints of the individual certified
> operation."
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> --
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