National Organic Standards Board
c/o Arthur Neil
Room 4008–South Building
1400 Independence Avenue–SW
Washington, DC, 20250-0001

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USDA NATIONAL
ORGANIC PROGRAM

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Re: Support of the NOSB's draft pasture guidance document

Dear NOSB Members,

I am writing to express full support for the NOSB's draft guidance document regarding pasture requirements for the National Organic Program. I have the expectation that the USDA organic seal represents the true meaning of "organic" which includes pasturing of animals as required by the National Organic Program Standards.

I request that the NOSB approve the draft pasture guidance document as written including: "Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. *The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days.* The Organic System Plan shall include a timeline showing how the producer *will satisfy the goal to maximize* the pasture component of total feed used in the farm system."

Lack of enforcement, on some operations, of the current Rule requirement for the pasturing of ruminants, including lactating dairy cows, has led to the necessity for the inclusion of the above numerical standards in the guidance document. Without clear, definitive wording, the intent of the Rule, with regards to pasture, will continue to be disregarded by some. This wording gives certifiers an explicit minimum amount of grazing intake and minimum allowable grazing season that will serve as a clear-cut trigger/guide in their certification process.

I firmly believe requiring significant pasture intake for ruminants, as this document promotes, represents a sustainable agricultural system, providing multiple benefits to the animals, environment and the consumers of organic products. Providing cows with access to pasture assures that organic principles are being met, with an interrelated system between the animals and the land, working from the soil up to promote an interdependent community. Pasture provides benefits to cows that include improved foot and leg strength, reduced breeding problems, less stress, lower culling rates, and enhanced immunity. Ruminants with access to pasture help ensure an organic production system that provides living conditions that allow animals to satisfy their natural behavior patterns, provides the animals with preventative health care benefits, and improves humane animal care and their welfare.

These benefits are passed down to consumers through more nutritious milk. A recent study conducted by the Danish Institute of Agricultural Research tested milk from cows farmed organically and found that it was 50% higher in Vitamin E, 75% higher in beta carotene and higher in omega 3 essential fatty acids than conventional milk. This study **tied these qualities to organic cows having room to graze and a diet high in fresh grass and clover, and forage**

Allowing cows to go to their feed rather than bringing feed to the cows substantially reduces the use of non-renewable resources and machinery required for feed transportation and ecological manure recycling. Responsible active management of quality pasture is an excellent way to improve soil quality. Careful management of pasture ensures maximum utilization and capture of solar energy, the basis of growing food.

I support the NOSB pasture guidance document and thank you for including clear, definitive minimums. The standards for organic farms and food marketed under the USDA organic seal must not be compromised.

Sincerely,

David Hershberger
Signature

David Hershberger
Name

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Address

Fredericksburg OH 44627
City, State, Zip

I am an: X organic dairy farmer
_____ organic consumer