

**FORMAL RECOMMENDATION BY THE  
NATIONAL ORGANIC STANDARDS BOARD (NOSB)  
TO THE NATIONAL ORGANIC PROGRAM (NOP)**

**Date:** August 17, 2005

**Subject:** Guidance on NOP Pasture Requirements

**Chair:** Jim Riddle

(sign)

**Recommendation**

The NOSB hereby recommends to the NOP the following:

Rulemaking Action: \_\_\_\_\_

Guidance Statement:   X  

Other: \_\_\_\_\_

**Statement of the Recommendation (including Recount of Vote):**

**Guidance for interpretation of §205.239(a)(2)**

**A. Organic System Plan**

Ruminant livestock should graze pasture during the months of the year when pasture can provide edible forage. The Organic System Plan should have the goal of providing a significant portion of the total feed requirements as grazed feed but not less than 30% dry matter intake on an average daily basis during the growing season but not less than 120 days per year. Growing season means the time of year of pasture growth from natural precipitation or irrigation. The Organic System Plan should include a timeline showing how the producer will satisfy the goal to optimize the pasture component of total feed used in the farm system. For livestock operations with ruminant animals, the operation's Organic System Plan should describe: 1) the amount of pasture provided per animal; 2) the average amount of time that animals are grazed on a daily basis; 3) the portion of the total feed requirement that will be provided from pasture; 4) circumstances under which animals will be temporarily confined; and 5) the records that are maintained to demonstrate compliance with pasture requirements.

**B. Temporary Confinement**

Temporary confinement means the period of time when a ruminant is denied pasture. The length of temporary confinement will vary according to the conditions on which it is based (such as the duration of inclement weather) and instances of temporary confinement should be the minimum time necessary. In no case should temporary confinement be allowed as a continuous production system. All instances of temporary confinement should be documented in the Organic System Plan and in records maintained by the operation.

Temporary confinement is allowed in the following situations:

- 1) During periods of inclement weather such as severe weather occurring over a period of a few days during the grazing season;

- 2) Conditions under which the health, safety, or well being of an individual animal could be jeopardized, including to restore the health of an individual animal or to prevent the spread of disease from an infected animal to other animals; or
- 3) To protect soil or water quality

#### C. Appropriate Pasture Conditions

As a tool for the farmer and the certifier, appropriate pasture conditions can be determined by referring to the regional Natural Resources Conservation Service Conservation Practice Standards for Prescribed Grazing (Code 528) for the number of animals in the Organic System Plan.

#### **Board vote – August 16, 2005**

13 yes, 0 no, 1 absent

#### **Rationale Supporting Recommendation** (including consistency with OFPA and NOP):

Rationale provided in text of recommendation below.

#### **Response by the NOP:**

*Updated 2/25/05*

## **NOSB Livestock Committee Recommendation for Guidance on Pasture Requirements for the National Organic Program Adopted by the National Organic Standards Board August 16, 2005**

### **Introduction**

The USDA National Organic Program (NOP) has requested NOSB provide guidance concerning the pasture requirements of the National Organic Program that the NOP can review and distribute to accredited certifying agents and post on the NOP website. The NOSB reviewed the proposed guidance from the Livestock Committee at the March, 2005 meeting, and made several changes. The NOSB then requested additional public comments on the revised guidance.

The NOSB Livestock Committee received and reviewed comments on the revised guidance. The Livestock Committee has revised the guidance to include several of the comments, including clarification of the meaning of growing season, clarification of the role of the NRCS standards, and certain grammatical issues. A minority opinion on the Livestock Committee sought the inclusion of the word “approximate” in relation to the percentage of DMI to reflect the annualized aspect of the Organic System Plan, however this opinion was not adopted by the Committee. The Livestock Committee will present this guidance to the NOSB at the August meeting and request that the NOSB recommend this

guidance to the NOP. The Livestock Committee believes that the guidance, combined with the rule changes recommended at the March 2005 meeting with regard to stage of life and lactation are sufficient, and no further rule changes are recommended at this time.

### **Guidance for interpretation of §205.239(a)(2)**

#### **A. Organic System Plan**

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### **C. Appropriate Pasture Conditions**

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Approved by the Livestock Committee July 12, 2005

5 Yes

0 No

0 Abstain

Amended and adopted by NOSB August 16, 2005

13 Yes, 0 No, 1 Absent