

From: "JOEL805@aol.com%inter2" <JOEL805@aol.com>
Subject: A measured petition regarding organic standards
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USDA Secretary Mike Johanns
1400 Independence Ave SW
Whitten Building - Suite 200A
Washington, DC 2025

I call on the USDA to:

1) Direct the National Organic Standards Board (NOSB) to clarify the National Organic Standards regarding pasture access in a reasonable way that takes into account both the spirit of the standards and a sustainable future for organic dairy. The organic regulations (Â§ 205.239) clearly state farmers must "maintain livestock living conditions which accommodate the health and natural behavior of animals, including access to pasture for ruminants." However, policy must also take into account the different weather conditions in different seasons and geographic regions. Fellow petitioners from organic consumer

organizations are concerned that the practice of producing "organic" dairy on CAFOs puts family farmers at a strong disadvantage with corporate agribusiness. While I agree that support of family farmers is important, I find the rhetoric of the consumer organizations to be excessively alarmist. USDA should direct NOSB to incorporate support for small farms into the evolution of organic standards, and then let the NOSB do its work. NOSB recommendations are thoughtful and measured, and I urge USDA to follow them.

2) I petition for the establishment of a timetable to phase out of the practice of allowing organic dairies to increase their herd size by continually importing young calves from conventional farms. This clause in the standards was reportedly implemented to help family farmers make the conversion from conventional to organic production. If that is so, it needs to be reevaluated over time. This allowance permits CAFOs to continually convert new conventional herds into "organic" production without having to go through the trouble and expense of breeding true organic animals. As the organic community would like to

encourage the breeding of organic livestock, the conversion clause should have a phase-out schedule, after which the ruminants should be bred from organic livestock on that farm or purchased as organic.

3) Release the names of current NOSB candidates. The NOSB will be losing five of its current board members after this meeting. Historically, the board has been made up of appointees chosen by the USDA along with input from the overall organic community. In the past, the USDA would release the names of candidates, which ultimately led to an open process of choosing the most qualified candidates. The USDA has currently refused to release the names of appointees. It is very important that the names be released so the organic community can be a part of helping the USDA choose the best possible appointees.

Thank you,

Joel Dee
1631 Las Canoas Rd.
Santa Barbara CA 93105