



## WESTERN ORGANIC DAIRY PRODUCERS ALLIANCE

February 23, 2024

### **NOP Certification Updates**

Below is a list of updates and reminders pertaining to your NOP Organic Certification:

#### **Organic Livestock and Poultry Standards (OLPS) Final Rule has been published!**

***What does this mean?*** This means that all certified organic livestock operations must comply with the requirements in the OLPS Final Rule **by January 2, 2025**, *except* for poultry operations.

Poultry Operations have the following compliance dates:

- (1) Currently certified organic layer operations and layer operations that are certified before January 2, 2025, must comply with the §§ 205.241(c)(2), (c)(4), and (c)(5), concerning outdoor stocking density requirements and soil and vegetation requirements, by January 2, 2029.
- (2) Currently certified organic broiler operations and broiler operations that are certified before January 2, 2025, must comply with §§ 205.241(b)(10), (c)(2), and (c)(6), concerning indoor and outdoor stocking density requirements and soil and vegetation requirements, by January 5, 2029.
- (3) Currently certified organic poultry operations and poultry operations that are certified before January 2, 2025 must comply with § 205.241(b)(4), concerning poultry house exit area requirements, by January 2, 2029.

The OLPS Final Rule text [here](#).

#### ***What does this OLPS Final Rule actually say?***

The OLPS Final Rule changes the requirements for living conditions and employs additional requirements to encourage humane management of organic livestock.

Some of the biggest changes to the requirements for ruminant livestock are...

- Incorporation of new terms and definitions surrounding animal handling and husbandry. Some examples are physical alterations (like beak trimming, mule sing, toe clipping, cattle wattling, caponization, etc.), stocking density.
- Added requirements of preventative healthcare practices like...
  - Prohibiting certain types of physical alterations (for cattle: tail docking of cattle, wattling of cattle, face branding of cattle) and for the allowed types, they must be completed by trained and knowledgeable personnel.
  - Performing surgical procedures when necessary
  - Lameness monitoring, management, and treatment
- Allowing Milk from Animals treated with restricted materials with a milk withhold (like flunixin, for example) can be fed to calves on the same operation.

- Codifies that withholding medical treatment from sick animals to preserve organic status is prohibited. The rule requires that all appropriate medications must be used to restore an animal to health when methods acceptable to organic production fail and if that means administering synthetic medications that impact an animal's organic status, then so be it.
  - They have also added requirements for producers to minimize pain and suffering for injured, diseased and sick animals and euthanize when appropriate per AVMA guidelines.
- Euthanasia requirements have been added to ensure prompt, humane, and effective plans and methods are documented and used on operations. The requirements closely mirror Validus requirements.
- Parasite Control Plans are now more formally required to ensure that preventative measures are in place on operations as parasiticides are not allowed to be routinely used.
- Requirements have been added for what sufficient shelter is:
  - Over a 24-hour period, animals must have sufficient space and freedom to lie down, turn around, stand up, fully stretch their limbs, and express normal patterns of behavior; Temperature level, ventilation, and air circulation must be suitable to the species; facilities must promote reduction of potential for livestock injury; and indoor housing must have areas for bedding and resting that are sufficiently large, solidly built, and comfortable so that animals are kept clean and dry, as appropriate for the species, and free of lesions.
  - Animal housing, pens, runs, equipment, and utensils shall be properly cleaned and disinfected as needed to prevent cross-infection and build-up of disease-carrying organisms.
  - In confined housing with stalls for mammalian livestock, enough stalls must be present to provide for the natural behavior of the animals.
- Living conditions for dairy youngstock have also changed: dairy young stock may be housed in individual pens until completion of the weaning process, provided that they have enough room to turn around, lie down, stretch out when lying down, get up, rest, and groom themselves; individual animal pens shall be designed and located so that each animal can see, smell, and hear other animals.
- New requirements for Animal transportation have been added:
  - Organic livestock must be clearly identified as organic, and their identity must be traceable for the duration of transport.
  - All livestock must be fit for transport: calves must have a dry navel cord and be able to walk on their own without human assistance and seriously crippled and non-ambulatory animals must not be transported for sale or slaughter. Such animals may be medically treated or euthanized.
  - Bedding must be provided during transport and in holding pens as needed and must be appropriate to the species and type of transport.
  - For transport that exceeds eight hours, measured from the time all animals are loaded onto a vehicle until the vehicle arrives at its final destination, the operation must describe how organic management and animal welfare will be maintained.

***How does this impact me and my operation?***

If you have questions on how this is going to fit into your specific production model, reach out to your certifier. They are required to provide sufficient information to their operations on how to comply with the act. Now is the time for operations to assess their production systems, facilities, and organic management to verify if there are any changes or improvements that need to be made in order for your operation to maintain its organic compliance.

There are a **lot** of changes of the requirements for poultry operations, but we won't get too far into that; if you have questions about the specific regulations that are changing for the poultry producers (as we know some of you have poultry production on your operations), please don't hesitate to let us know and we can connect you with the required information.

### **Strengthening Organic Enforcement (SOE) Final Rule - REMINDERS**

SOE compliance date is quickly approaching: **March 19, 2024**.

***Reminders to all certified operations of what you need to do before the compliance date:***

- Ensure all operations that you're doing business with (buying or selling organic products) are certified organic unless the products are in sealed, tamper evident containers.
- Examine your recordkeeping to ensure that it's up to par with 205.103.
- **Fill out whatever forms your certifiers are asking of you to demonstrate compliance. The NOP means business with the compliance date and has expressed that they will be enforcing requirements strictly after that date.**
- If anyone is in need of an organic certifier, please visit [Organic Integrity Database \(usda.gov\)](https://www.usda.gov) for a list of options.

The SOE Final Rule text can be found [here](#).

***For questions, please reach out to***

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