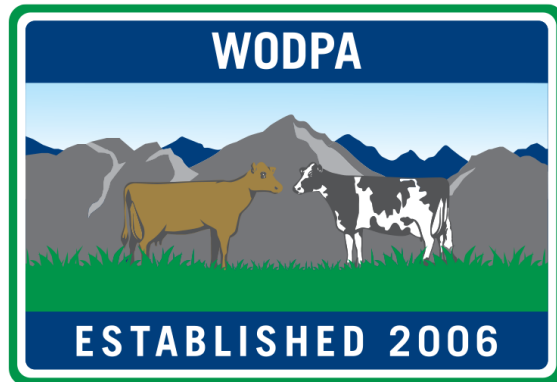


Organic Dairy Farmer Feedback Survey Results

Focusing on the impacts of SOE & OOL



WESTERN ORGANIC DAIRY PRODUCERS
ALLIANCE

NODPA



The goal of this survey was to collect information and feedback regarding the newly implemented **Strengthening Organic Enforcement** (SOE) Rule and the **Origin of Livestock** (OOL) Rule. **WODPA** & **NODPA**'s farmer members have experienced more ramifications than originally expected or intended with the implementation of these two new rules passed by the National Organic Program (NOP).

Relationships with certifiers have become strained and inspectors are feared. Organic dairy farmers care for their land and their animals with the utmost integrity. Because of this, WODPA and NODPA would like to discuss potential steps moving forward.

Metrics

- **37 Organic Dairy Farms** throughout the United States
- Certified organic between 5 years- 25 years
- States Represented:
 - California, Oregon, Washington, Idaho, Utah, Texas, Wisconsin, New York, Pennsylvania, Vermont and Maine
- Over **15,000 cows** are represented in our survey results



Farms certified by:

- California Certified Organic Farmers (**CCOF**)
- Oregon Tilth (**OTCO**)
- Marin Organic Certified Agriculture (**MOCA** - no longer certifying livestock operations)
- Organic Certifiers (**OC**)
- Quality Assurance International (**QAI**)
- MOSA Certified Organic, Global Organic Alliance (**GOA**)
- Northeast Organic Farming Association (**NOFA NY**)
- Pennsylvania Certified Organic (**PCO**)
- **OEFFA** Certified Organic
- Vermont Organic Farmers LLC (**VOF**)



Certification cost
increases:



Increases anywhere from 50% to 200% - Most certification costs have doubled (some have doubled just in the past year).

Proof through QuickBooks/ third- party companies of the payments received for organic sales



Topics focused on during on-site inspections that seemed more invasive or specific than usual

- Traceability animals
- Cattle hauling records
- Validus & F.A.R.M. inspection summaries (animal welfare)
- Request for employee training logs
- Request for animal inventories for the past 3-5 years.
- Financials, invoices and past non-compliance reports were requested from previous years.



- SOE has resulted in changes in the templates provided. Farmers have filled out the same template multiple times with only minor changes made each time.
- The certifier required new templates be included in the OSP. Much of the information requested is in other parts of the OSP. When the farmer called to request help with filling it out, they were told they didn't have time to walk them through it.



- Seed information (including at least 3 affidavits for untreated seed since organic was not available)
- List of past non-compliances and proof farm has fixed them (going back over 5 years)



Clarifications needed

- When calculating pasture/ dry matter intake, is it a weighted average over all of the pasture season or is it on a per day basis?
 - Example: If lactating cows are getting 40% DMI from grazing for 100 days of pasture season but then only 28% for the remaining required 20 days, would it still meet the requirements?
- Do heifers, dry cows and lactating cows all have to be pastured/ grazing at the same time?
- If a material is already listed on OMRI, why does it need to be approved by certifiers individually for use on a farm prior to actually using it?

Interesting feedback

- Are you familiar with SOE?
 - 7- no's
 - 30 – yes's
- Are you familiar with OOL?
 - 1 – no
 - 36 – yes's
- Have you been involved in oral or written comments to NOSB for OOL or SOE?
 - 28 – no's
 - 9 – yes's (all OOL commenting)



Opportunities for certifiers to help:

Summary of changes when new rules are implemented.

Clear, written answers to questions regarding rules

On time/ up to date certificates (within 12 months) given to clients/farmers (without having to ask multiple times)

- Even the Organic Dairy Research and Promotions Board requires an organic certificate with an issue date within 18 months

More knowledgeable/trained inspectors

Feedback survey on inspectors

Opportunities for NOP to help:

Provide more FAQ sheets
(printed and mailed as
well as emailed)

OSP template moving
forward as rules are
implemented

Annual feedback survey
on certifiers

Transparency on how to
evaluate risk- based
certification process

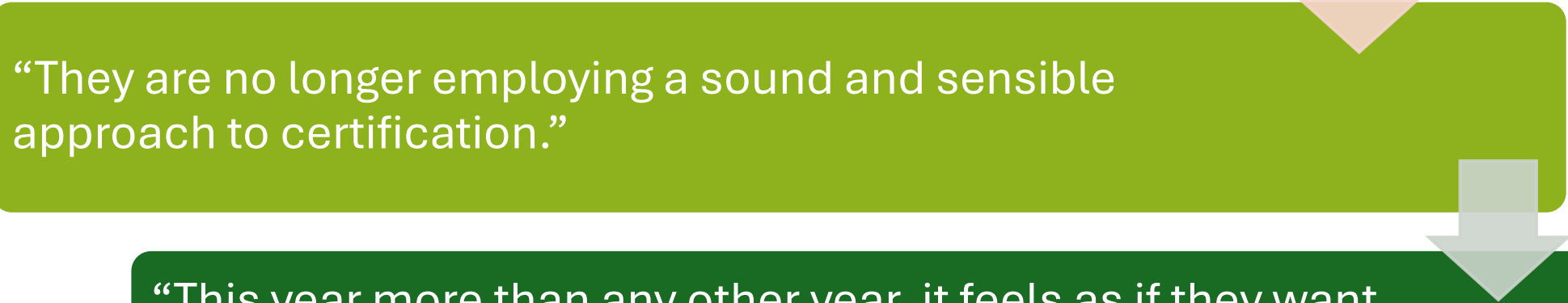
- Transparency of conversations
between NOP, NOSB, Certifiers
and Farmers

Quotes from Dairy Farmers:

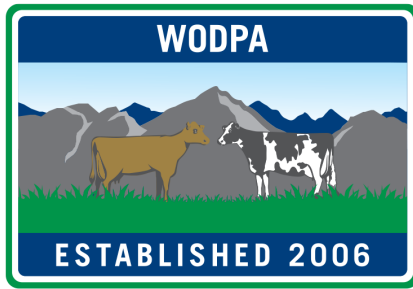
“The certifier is asking for a lot more information that isn’t found or backed by organic regulations.”



“They are no longer employing a sound and sensible approach to certification.”



“This year more than any other year, it feels as if they want to catch us doing something wrong and just get mad at us rather than helping us to comply.”



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Save the Date:

WODPA Annual Conference & Trade Show
October 28th – 29th in Santa Rosa, CA



Ed Maltby

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Save the Date:

NODPA's Annual Field Days
September 25th – 26th in Pompey, NY

Thank you for meeting with us today!