



WESTERN ORGANIC DAIRY PRODUCERS
A L L I A N C E

April 28, 2025

National Organic Standards Board
USDA-AMS
1400 Independence Avenue, SW
Washington, DC 20250-0268

RE: AMS- NOP-24-0081 - Livestock Comments

WODPA Comments to the National Organic Standards Board
Spring 2025
April 29 – May 1
Virtual

Livestock Comments

Dear National Organic Standards Board,

Thank you for this opportunity to comment on substances and discussion considered for the National Organic Standards Board (NOSB) Spring 2025. These comments are submitted on behalf of the Western Organic Dairy Producers Alliance (WODPA). WODPA'S mission is to preserve, protect, and ensure the sustainability and integrity of organic dairy farming. We represent organic dairy farms in the Western United States. WODPA is committed to advocating for organic dairies, their livelihoods and issues impacting the sustainability of the organic dairy. We value the opportunity to provide comments on both the sunset materials review as well as the idea of risk- based certification. Please see our comments below:

Sunsets

Flunixin:

WODPA supports the relisting of flunixin as it is one of the only tools in our toolbox to provide pain mitigation for a whole host of ailments. In order to maintain the exceptional standards our farmers have regarding animal welfare, we need to have flunixin available for use.

Oxytocin:

WODPA supports the relisting of oxytocin with an annotation that provides clarity to farmers and herd veterinarians. In the past, oxytocin has been used to assist in animal's milk production or as an aid for them to let their milk down quicker. WODPA supports an annotation restricting the use of oxytocin to only be used in dire situations related to labor and immediately thereafter. However, it is essential to have oxytocin as an option for veterinarians to prescribe and farmers to use.

Proposal

Risk- Based Certification:

We also want to take the opportunity to speak regarding risk- based certification. Although WODPA does recognize the immense burden placed on farmers with the implementation of the Strengthening Organic Enforcement Rule, we do not think risk- based certification is the answer. We know that Certifiers currently have their own methods for assessing risk of fraudulent behaviors. We do understand the need for this rule and we support the premise of why it was created and implemented. However, we see all of our organic dairy operations taking the brunt of this implementation whether it is increased financial burden, increased certification requirements or all- around strained relationships with certifiers. The ACA SCTA risk scorecard defines low risk as any livestock operations that provide over 40% dry matter intake. In WODPA's opinion, this provides enticing benefits for people to provide false claims and information to meet that 40% threshold and therefore receive less scrutiny when it comes to annual and surprise inspections. According to the current NOP standards, there is no difference between achieving the minimum pasture requirements for livestock above 6 months of age or guaranteeing they receive above 40% dry matter intake from pasture. All operations, regardless of size or rations, should be inspected the same. Regarding certification costs, I think a large majority of the costs can be mitigated by providing digital copies from the farm to the inspector to be reviewed prior to the inspection. We need consistency. SOE provided some of that consistency, but we need to see more across the board. However, this consistency should not come at the expense of our farmers.

Summary:

WODPA thanks the National Organic Standards Board for the opportunity to comment. We thank you for your commitment to organic agriculture and for ensuring the integrity of the organic seal.

Respectfully submitted,



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