

JANUARY 18, 2021



**WESTERN ORGANIC DAIRY PRODUCERS**  
**ALLIANCE**



## **SIGN-ON FOR ORIGIN OF LIVESTOCK LETTER TO THE NEW SECRETARY OF AGRICULTURE**

The organic community has been working for years to close loopholes in the organic standards for how dairy cows are transitioned to organic production. The USDA has spent years considering a new rule on the Origin of Livestock (OOL). The delay has allowed the loopholes in the current rule to drive an oversupply of organic milk that has done economic harm to organic dairy farmers.

Many of you joined a letter last summer to call on USDA's National Organic Program to finish this long-overdue OOL rule, after the program missed a deadline set by Congress. But the National Organic Program has still not completed the new rule and announced in the fall that they are working on a new version of the rule to address concerns about whether it will be enforceable.

Please join us in signing a letter to the incoming Secretary of Agriculture urging swift action to complete an Origin of Livestock rule that provides a strong, enforceable standard that will level the playing field for organic dairy producers and protect the integrity of the organic label.

The text of the letter is pasted below and you can add your dairy by [signing this google form](#).

**\*The deadline to sign on is this week: midnight on Wednesday, January 20, 2021.**

## **RE: USDA National Organic Program – Origin of Livestock Rulemaking**

Dear Secretary Vilsack:

As members of the organic community, we look forward to working closely with you to advance a food and agriculture system that benefits the health of people and the planet.

In that regard, we are writing today about an issue that is important for the future of organic dairy farmers, their families, and the integrity of the organic label. This issue is the need to clarify the regulation regarding Origin of Livestock (7 CFR 205.236), pertaining to the process of transitioning conventional dairy livestock to organic production.

The organic label is one of the most highly trusted labels for consumers. This is due to the strong Federal standards and enforcement behind the label. There are, however, some areas where the USDA's National Organic Program standards need to be strengthened to retain that consumer trust. Solidifying standards to ensure all organic farmers operate under the same rules is essential for the entire organic community. The economic viability of organic dairy farmers is dependent upon clarification of regulations to stop varied interpretations or loopholes regarding dairy livestock transitioning practices.

The problem has been that those organic dairy producers who have utilized the loophole to continuously transition conventional animals into organic production have gained an economic advantage and contributed to the oversupply of organic milk. This has contributed to a significant drop in the milk prices paid to organic dairy farmers, the majority of whom were held to a higher standard and stricter enforcement.

In 2015, during the Obama-Biden Administration, USDA published a proposed rule to close the loopholes related to 'Origin of Livestock' (80 FR 23455). Specifically, the proposed Rule would clarify that: "After completion of a one-time, 12-month transition period of an existing conventional dairy herd (or livestock to form new organic dairy operations), all new dairy animals milked on the organic dairy farm would need to be managed organically from the last third of gestation."

The 2015 proposed rule garnered strong, united support from the organic community and consumers, especially the provision that stopped conventional livestock from continuously entering the organic herd. Implementing the 2015 Proposed Rule would clarify the regulation so that all certifiers will consistently enforce the same standards, with confidence that their decision would be upheld in any legal challenge. Unfortunately, the 2015 rule has never been

finalized.

Organic dairy farmers understand the economic importance of maintaining the integrity of the organic label by finalizing the 'Origin of Livestock' (80 FR 23455). For 15 years, organic dairy farmers have advocated for an enforceable regulation applied equally to all certified producers. The organic community has provided comments two times on Proposed Rules from the National Organic Program (NOP) to stop the continuous transition and two-track system interpretation created by loopholes in the current regulation. USDA's unconscionable delay in issuing a Final Rule has resulted in economic damage, financial hardships, and closure of businesses for organic dairy farmers following the true intent of the organic standards.

Congress included a provision in the Fiscal Year 2020 Agriculture Appropriations bill requiring USDA to finalize the long-delayed rule by June 17, 2020. USDA missed that deadline. On October 21, 2020, the NOP announced plans to publish another Proposed Rule to address enforcement issues raised by USDA's Office of General, instead of moving directly to a final rule as required by Congress. NOP has failed to provide a timeframe for issuing the new regulations. Organic dairy farmers and the organic community more broadly are frustrated by the NOP's continued delay in finalizing this regulation.

**The undersigned organizations urge you to take the immediate actions necessary to finalize this important rulemaking, to establish a consistent and fully enforceable standard regarding the origin of dairy livestock used for organic production.**

Sincerely,  
Northeast Organic Dairy Producers Association  
Western Organic Dairy Producers Association  
Organic Farmers Association  
National Organic Coalition  
<<Org Names will be listed in alphabetical order>>

CC:  
Congressional Leaders TBD  
National Organic Standard Board

**\*\*Thank you to Kate Mendenhall for sharing of this info:**

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**\*\*Organic Farmers Association provides a strong and unified national voice for domestic certified organic producer\*\***

## **Lunchtime Learning Events:**

Watch your email and the WODPA Facebook page for upcoming Lunchtime Learning Events brought to you by WODPA.

In our virtual world, WODPA has the unique opportunity to partner with dairy industry stakeholders to bring information right to you on the farm. The Lunchtime Learning Events will be one-hour sessions aimed to provide information and education to our WODPA membership and others within our industry.

For our first event, we have partnered with Select Sires to bring you information on Herd Management Systems. We look forward to discussing how herd management applications may fit into our dairies and the information they can provide us with. From nutrition, fertility, health, or even locating a cow, herd management systems may be a great tool for more proactively managing a herd. Select Sires will also share information on their program, CowManager, and its specific benefits. We're appreciative of their willingness to share herd management system information and their sponsorship of this event.

Again, watch your email and the WODPA Facebook page for the date and time of our first event.

**We look forward to your suggestions or ideas for future events. Are you using something on your dairy that others may benefit from? Together we can help each other be more sustainable, more profitable, and better prepared to face the challenges dairies are facing.**

**Please feel free to contact Jill Smith, [jillpuredairy@gmail.com](mailto:jillpuredairy@gmail.com) with any suggestions on future learning events.**

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WODPA is funded by volunteer [Producer Payments](#) and [Associate Member dues](#).

Click [here](#) to learn how you can support WODPA and its mission.  
WODPA would like to send a huge thank you to the [Producers](#) & [Businesses](#) that have provided support in 2020!

## WE WANT TO HEAR FROM YOU!!

Tell us about what projects or accomplishments you have completed on your dairy. New technology, new grazing methods, new funding for infrastructure - we are interested and would love to share.

[wodpa@outlook.com](mailto:wodpa@outlook.com)



The mission for the Western Organic Dairy Producers Alliance is to preserve, protect, and ensure the sustainability and integrity of organic dairy farming across the west.

Don't forget to "Like Us" and "Follow Us"

