



WESTERN ORGANIC DAIRY PRODUCERS
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NOSB ORAL COMMENT TALKING POINTS:

Thank you for the opportunity to comment on items for the National Organic Standards Board, Fall 2019 meeting.

I am (name) an organic dairyman from (city, state).

Comments on Current State of Organic Dairy: We are facing challenging and never before seen times in the organic dairy industry. (Personal comments on economic challenges on your dairy or industry, we don't know what our futures look like – EX: organic cattle prices, pay prices with milk oversupply, personal financial damage/situation or anything willing to share)

We need a level playing field for everyone in the organic dairy industry. To do this we need:

- **A final rule on the Origin of Livestock, with immediate implementation. (Proposed rule allows for a one-time transition of livestock to organic, no continuous transition of animals from conventional to organic, etc.). The proposed rule has broad support across the organic dairy industry and we need you to take action on this asap.**
- Enforcement of pasture rules.
- Consistency across certifying agencies, not leaving rules open to interpretation, consistent enforcement by certifiers.
- Greater transparency on enforcement of the rules

We need to ensure the integrity of the organic seal! We must be able to ensure our organic consumers that organic rules are being followed and enforced. When we choose to be an organic producer, we choose to follow organic rules. We must all be held to the same standards for the sake of the organic producer community and for the sake of our consumers.

In regard to substances up for review:

- A guiding principal with organic livestock is to practice the highest animal welfare standards we can. In doing so, we need all of the preventative tools available to us that we can get for herd health.



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- We are limited in treatment options, so best practice is to build strong immune systems in our herds.
- If immediate treatment is needed, we need approved, readily available tools in our toolboxes.
- Not having the products we need would put us at a disadvantage with our animals and our ability to put a high quality dairy product into the marketplace.
- Our herds are our livelihood. Having the tools we need for our livestock, for proper sanitation and proper animal care are essential.

Thank you for the opportunity to comment. Thank you for your commitment to organic agriculture, your commitment to upholding organic standards and for your work to ensure the integrity of the organic seal.

Prepared by,

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