



CCOF

Organic Certification

Education & Outreach

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Promotion

Paul Lewis, Ph.D.
Director, Standards Division, National Organic Program
USDA-AMS-NOP
1400 Independence Ave. SW
Room 2646-So., Ag Stop 0268
Washington, D.C. 20250-0268

Docket: AMS-NOP-17-0031; NOP-15-06A; RIN 0581-AD74
Re: National Organic Program; Organic Livestock and Poultry Practices Rule

June 9, 2017

Dear Dr. Lewis:

CCOF (California Certified Organic Farmers) strongly supports the Organic Livestock and Poultry Practices (OLPP) rule and urges USDA to let the rule become effective on November 14, 2017 (Option 1). Enclosed are CCOF's comments in support of Option 1.

CCOF is an organic certifier and a nonprofit organization that advances organic agriculture for a healthy world. We advocate on behalf of our members for organic policies, support the growth of organic through education and grants, and provide organic certification services.

If USDA further delays, suspends, modifies, or withdraws the rule, then organic producers of all scales and types of operations will be negatively impacted. They will continue to operate on an unfair playing field where some certifiers allow producers to implement practices that do not align with organic principles and consumer expectations of organic products. Organic stakeholders have already followed all the necessary steps to create a rule that protects animal welfare, meets consumer expectations, and ensures consistency among certifiers in enforcing organic standards for livestock production.

Thank for your careful consideration of our comments. Please contact me for further information.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Damewood".

Kelly Damewood
Director of Policy and Government Affairs

cc: Cathy Calfo, Executive Director/CEO
Jake Lewin, President, CCOF Certification Services, LLC

CCOF Comments on the Organic Livestock and Poultry Practices Rule (OLPP)

CCOF supports full implementation of the OLPP on November 14, 2017 (Option 1) for the following reasons:

1. The OLPP aligns with consumer expectations for organic products and supports the success of the entire organic sector.

As a voluntary, opt-in regulatory framework, organic standards must take into account consumer expectations for organic products. Organic consumers pay a premium because they trust the integrity of organic standards and the certification process. During the 14-year development of the standards now included in the OLPP, the National Organic Standards Board (NOSB) and the National Organic Program (NOP) carefully weighed consumer expectations for the treatment of animals with the practical and science-based practices used by producers to care for livestock and poultry. Producers who do not want to meet consumer expectations for organic products are not held to organic standards, and they have other marketing and labeling options available to them. Therefore, further delays and unclear standards only tarnish the USDA organic seal and negatively affect consumer trust, which in turn negatively impacts the market for all organic producers.

2. The OLPP's standards are achievable.

Although some CCOF-certified producers will have to modify some of their practices, CCOF's over 200 certified organic livestock operations—including dairy, beef, poultry, and pork producers—are already largely in compliance with the OLPP. Moreover, CCOF members support the OLPP standards, as evidenced in the sample of attached letters. And as the largest organic certifier in the U.S., CCOF is fully confident that organic producers will continue to thrive in the flourishing organic marketplace when they adjust their practices to meet the OLPP requirements.

3. The OLPP levels the playing field for organic livestock producers.

The OLPP would ensure consistent, fair implementation of organic livestock standards among certifiers. Some certifiers allow housing and confinement practices that CCOF has never allowed, including porches for poultry production. Certifiers have either loosely interpreted existing standards or are reluctant to exercise their authority to fully enforce outdoor access requirements without further clarification from the NOP. These disparities among certifiers create an unfair playing field where producers like CCOF members must compete with producers who are not held to the same high animal welfare standards. CCOF has long advocated for a rule like the OLPP because it would ensure consistent implementation of standards addressing animal welfare in organic production.



4. The OLPP standards do not pose biosecurity risks to poultry.

CCOF works with its organic livestock producers to determine appropriate methods and durations of confinement of organic poultry to protect the health, safety, and welfare of the animals. NOP recently reissued a statement, which confirms temporary confinement of organic poultry is allowed in the USDA organic regulations (7 CFR 205.239(b)). CCOF remains unaware of any situation where a certified organic operation failed to adequately protect poultry from avian flu or other disease by inappropriately allowing birds outside.

5. Further delays undermine the organic rulemaking process.

Organic stakeholders spent over a decade developing the standards incorporated into the final OLPP. The NOP uses a transparent process to create organic standards, including multiple rounds of public comment and discussions through the NOSB meetings. Throughout the development of organic standards, stakeholders and members of the public have ample opportunities to participate in extensive discussions, analysis, and review of proposed standards. To ignore this highly transparent, trusted organic rulemaking process now would undermine all future efforts to clarify and strengthen organic standards. Therefore, USDA should not hesitate in fully implementing the OLPP on November 14, 2017.