

The Honorable Sonny Perdue  
U.S. Department of Agriculture  
1400 Independence Avenue SW  
Washington, D.C. 20250

December 5, 2018

Dear Secretary Perdue,

The undersigned organic livestock producers write to support the National Organic Standard Board's (NOSB) unanimously passed resolution on the 2015 Origin of Livestock proposed rule and to urge USDA to issue a final rule on the Origin of Livestock.

Based on six recommendations from the NOSB, the Origin of Livestock rule proposed to clarify and amend the requirements for how dairy producers can obtain organic certification for their herds. The proposed rule specified that a producer can transition dairy animals into organic production once, and that any new dairy animals added to an organic dairy farm would need to be managed organically from the last third of gestation or animals from organic dairy farms that have already completed their transition.

The Origin of Livestock rule is needed to provide consistent and enforceable requirements that clarify the sourcing of organic dairy herds. The proposed rule received strong support from the majority of organic stakeholders because it bolsters the organic standards, aligns with consumer expectations, and helps level the playing field for certified organic livestock operations.

The success of the \$50 billion U.S. organic sector depends upon consumer trust in the integrity of the USDA organic seal. Strong standards, such as the Origin of Livestock rule, are the backbone of this integrity. We urge USDA to publish an Origin of Livestock final rule that incorporates stakeholder feedback from the proposed rule.

Sincerely,

Ross & Kelly McGarva  
McGarva Ranch

Tim Mueller  
Riverdog Farm

Doug Beretta  
Beretta Dairy

John, Kristin, Robert, & Ronald Vevoda  
Vevoda Dairy

Chuck Morrison  
Morrison Brothers Dairy

Kelly Mulville  
Paicines Ranch

Michael Evenson  
Lost Coast Ranch

Peter Talbott  
Talbott Ranch

Aaron McAfee  
Organic Pastures Dairy

Lynda Carinalli  
Carinalli Dairy

Steve Zaritsky  
SZ Ranch

Cynthia Daley  
Organic Dairy Program – California State University, Chico

Blake, Stephanie, Joseph, Alexa, Christian, Callie, Vanessa, Dalton, & Savanna Alexandre  
Alexandre Family Farm

Bruce Walker  
Starwalker Farms

CC: Greg Ibach, USDA Under Secretary for Marketing and Regulatory Programs  
Jennifer Tucker, Ph.D., Deputy Administrator, National Organic Program  
Paul Lewis, Ph.D., Director, Standards Division, National Organic Program