

October 26, 2006

VIA HAND DELIVERY AND BY ELECTRONIC MAIL

Honorable Secretary M. Johanns
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Re: Organic Dairy Systems

Honorable Secretary Johanns:

Each of the undersigned companies is committed to the National Organic Program and supports an even stronger USDA organic seal. Your very commendable efforts to develop the largest record ever assembled on the role of pasture in organic dairy systems has provided a unique opportunity for the organic dairy community to come together on some core, consensus first principles.¹ Together we work with farmers that produce the vast majority of organic milk sold in this nation. We share with them the goal of developing a meaningful, measurable and verifiable standard for pasture.

We believe the record developed strongly supports a proposed final rule that optimizes the role of pasture in all organic dairy operations and that places increased reliance on the organic systems plan. The plan should ensure each farm has practice standards that *verifiably* demonstrate that the farm's pasture plan promotes active grazing and animal health, safety and wellbeing. We urge the Secretary to propose a final rule that respects the following key principles, and does not contain any loopholes.

The organic system plan² must require, and the certifying agent must verify,³ that:

1. All certified organic dairy animals over the age of six months, including lactating animals, are grazed on pasture⁴ for a minimum of 120 days per calendar year.
2. The pasture plan maximizes feed consumption from pasture during the crop year and demonstrates an appropriate relationship between land and animals.

¹ See 71 Fed. Reg. 24820 (April 27, 2006)

² See U.S.C. §6502 (13)(definition; "organic system plan"); 7 U.S.C. §6513 (Organic plan); §6506(a)(2) (General Requirements); 7 U.S.C. §6513(a)

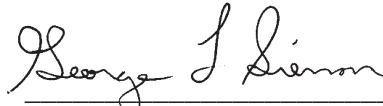
³ See e.g. 7 C.F.R. §205.201 (Organic production and handling system plan.) (plan must be "agreed to by the producer or handler and an accredited certifying agent.")

⁴ See 7 C.F.R. §205.2 (definition; "pasture")

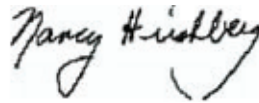
3. The pasture plan maintains or improves the quality of the pasture and the health, safety and wellbeing of the animal.

By requiring that pasture be an integral component of the organic system we believe the NOP will establish a stable framework for the continued success of the organic dairy program.

Sincerely Yours,



George Siemon
CROPP Cooperative/Organic Valley



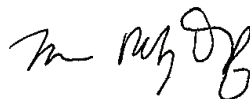
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Kelly Shea
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