

Items shared with Office and Management and Budget

January 11, 2022

Item

1. OTA Dairy Council Letter (Dec. 2, 2019)
2. OTA Farmers Advisory Council Letter (Dec. 2, 2019)
3. FY 2020 Appropriations Bill (Dec. 20, 2019)
4. Accredited Certifiers Association Letter (Feb. 14, 2019)
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7. Organic Dairy Letter to Nominee Vilsack and Transition Team (Dec. 21, 2020)



December 2, 2019

Paul Lewis, Ph.D.

Standards Division, National Organic Program, USDA-AMS-NOP

1400 Independence Avenue, SW, Room 2642-So., Ag Stop 0268

Washington, DC 20250-0268

**Docket: AMS-NOP-11-0009; NOP-11-04PR**

Dear Dr. Lewis:

Thank you for this opportunity to provide comment on the USDA National Organic Program (NOP) proposed rule to amend the origin of livestock requirements for dairy animals under the USDA organic regulations. Immediately issuing a final rule on the Origin of Livestock is critical to provide consistency in the organic dairy standards and to prevent further economic harm to the thousands of organic dairy farmers that adhere to the strict regulations required by the organic program.

The Organic Trade Association's Dairy Sector Council brings together farmers, handlers, processors, and manufacturers to advocate for and advance the U.S. organic dairy industry. The current Dairy Council membership comprises over 90% of the U.S. organic dairy market and includes a diverse cross section of farmers and companies from small farms to some of the largest food companies in the world. The Dairy Council held its inaugural meeting in 2019 and a primary priority of the Council's work this year was to advocate for a final rule on the Origin of Livestock.

The organic dairy industry has been requesting consistency and clarity on the regulations related to transitioning dairy livestock to organic production for well over a decade. We support the original proposed rule published by USDA in 2015 that narrows the regulations by allowing a farm to transition their livestock to organic production over a one-year period as a one-time event, after which any new animals born or brought onto the farm must be raised organically from the last third of gestation. The proposed rule clarifies that continuously transitioning conventional animals to organic production or cycling animals in and out of organic production is strictly prohibited.

The policy outlined in the 2015 proposed rule strikes the right balance by not limiting, in any way, the ability of a conventional dairy producer to convert their existing herd to organic production while also providing consistency in application of the regulations and a level playing field to all organic dairy producers. There is widespread support amongst the organic industry for the 2015 rule, which is reflected in the original public comment record. Over 99% of the more than 1,500 comments submitted from stakeholders support the rule.

Additionally Congress has expressed their strong support for USDA finalizing the 2015 rule through multiple comments made during several public Congressional hearings as well as taking the unusual step of requiring USDA to issue a final rule by including the following language in both the House and Senate passed Agriculture Appropriations bills for Fiscal Year 2020:



*“Not later than 180 days after the date of the enactment of this Act, the Secretary of Agriculture shall issue a final rule based on the proposed rule entitled “National Organic Program; Origin of Livestock,” published in the Federal Register on April 28, 2015 (80 Fed. Reg. 23455): Provided, that the final rule shall incorporate public comments submitted in response to the proposed rule.”*

A final rule on Origin of Livestock is needed now more than ever. Our analysis indicates that organic dairy farmers who raise their calves according to the organic standard from birth spend an estimated \$600 to \$1,000 more per calf than farmers who raise calves conventionally and transition them to organic at one year of age. Since USDA originally issued a proposed rule in 2015, the market conditions for organic dairy farmers have worsened. According to the Organic Trade Association, this is the second year in a row that growth in the organic dairy category has fallen below 1% after experiencing high single-digit to low double-digit growth from 2010 to 2016. The milk and cream subcategory declined 1.3% in 2018.

With the downward pressure on dairy prices and slowdown in organic dairy consumption and sales, the importance of fair enforcement of regulatory standards is paramount. We ask that you immediately issue a final rule that includes the policies contained in the original proposed rule issued in 2015 and limits the allowance for transitioning dairy animals to organic milk production as a one-time event.

Thank you for your support of the organic dairy industry and for the opportunity to provide additional comments on the proposed rule on Origin of Livestock. We look forward to USDA issuing a final rule expeditiously.

Sincerely,

Alexandre Family Farm  
Aurora Organic Dairy  
D&M Family Farm  
Danone North America  
Dykstra Farms  
Fagundes Bros. Dairy  
Fair Hill Farms, Inc.  
General Mills  
Harmony Organic Dairy LLC  
K-n-R Farms Organics  
Maple Hill Creamery  
Mensonides LLC/Providence Farms  
Organic Valley/CROPP Cooperative  
Perk Farm Organic Dairy  
Pleasantview Farm  
Sheffers Grassland Dairy LLC  
Stonyfield Farm, Inc.  
Western Organic Dairy Producers Alliance

December 2, 2019

Paul Lewis, Ph.D.  
Standards Division  
National Organic Program  
USDA-AMS-NOP  
1400 Independence Ave. SW  
Room 2642-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket: AMS-NOP-11-0009; NOP-11-04PR**

**RE: Origin of Livestock**

Dear Dr. Lewis:

Thank you for this opportunity to provide comment to the USDA National Organic Program proposed rule on Origin of Livestock. The Organic Trade Association's Farmers Advisory Council **supports** the Origin of Livestock Proposed Rule and urges USDA to move expeditiously to a final rule to clarify and narrow the allowance to transition dairy animals into organic milk production as a one-time event.

The Organic Trade Association's Farmers Advisory Council is a broad coalition of organic farming organizations that provides the Association with input from small- and medium-sized organic farmers, ranchers, and growers for organic agriculture's advancement. Established in 2013, the Council gives organic farmers direct influence on the Association's policy agenda and enables the Organic Trade Association to better represent the diversity of organic producers in legislative and regulatory advocacy. Each organization appoints one producer for each 500 members it represents to serve as the voice of its organization in Council business. Through these partnerships, the Organic Trade Association's Farmers Advisory Council is one of the largest coalitions of organic farmers and organic farming organizations in the United States, representing nearly 8,000 organic livestock, grain, and specialty crop producers from most regions and production systems across the country.

All organic farmers regardless of production system, scale, or geographic location have a stake in protecting the integrity of the organic seal. The lack of regulatory specificity regarding the origin of dairy livestock has created inconsistent enforcement and economic harm to organic farmers. Rulemaking is critical to bring consistent enforcement, a level playing field to all organic dairy producers, and protect consumer trust and integrity of the organic seal.

The Organic Trade Association's Farmers Advisory Council, along with the organic industry, the National Organic Standards Board, and Congress, all agree that USDA must issue a final rule that reflects the policies contained in the original proposed rule



**CROPP COOPERATIVE**  
organic and farmer-owned since 1988





issued in 2015 and limits the allowance for transitioning dairy animals to organic milk production as a one-time event.

Sincerely,

CCOF, Inc.  
Georgia Organics  
Montana Organic Association  
Oregon Tilth Certified Organic  
Organic Egg Farmers of America  
Organic Valley/CROPP Cooperative  
Pennsylvania Certified Organic  
Tilth Alliance of Washington  
Western Organic Dairy Producers Alliance

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by providing technical assistance through analysis of current hospital management practices.

SEC. 754. There is hereby appropriated \$2,000,000, to remain available until expended, for grants under section 12502 of Public Law 115-334.

SEC. 755. There is hereby appropriated \$2,000,000 to carry out section 1621 of Public Law 110-246.

Deadline.  
Regulations.  
7 USC 6509 note.

SEC. 756. Not later than 180 days after the date of the enactment of this Act, the Secretary of Agriculture shall issue a final rule based on the proposed rule entitled “National Organic Program; Origin of Livestock,” published in the *Federal Register* on April 28, 2015 (80 Fed. Reg. 23455): *Provided*, That the final rule shall incorporate public comments submitted in response to the proposed rule.

Public  
information.

SEC. 757. There is hereby appropriated \$3,000,000, to remain available until September 30, 2021, to carry out section 4003(b) of Public Law 115-334 relating to demonstration projects for Tribal Organizations.

SEC. 758. There is hereby appropriated \$1,000,000 for the Secretary to carry out a pilot program that provides forestry inventory analysis, forest management and economic outcomes modelling for certain currently enrolled Conservation Reserve Program participants. The Secretary shall allow the Commodity Credit Corporation to enter into agreements with and provide grants to qualified non-profit organizations dedicated to conservation, forestry and wildlife habitats, that also have experience in conducting accurate forest inventory analysis through the use of advanced, cost-effective technology. The Secretary shall focus the analysis on lands enrolled for at least eight years and located in areas with a substantial concentration of acres enrolled under conservation practices devoted to multiple bottomland hardwood tree species including CP03, CP03A, CP11, CP22, CP31 and CP40.

Contracts.  
Grants.  
Non profit  
organizations.

Analysis.  
Time period.

SEC. 759. In addition to amounts otherwise made available by this Act and notwithstanding the last sentence of 16 U.S.C. 1310, there is appropriated \$4,000,000, to remain available until expended, to implement non-renewable agreements on eligible lands, including flooded agricultural lands, as determined by the Secretary, under the Water Bank Act (16 U.S.C. 1301-1311).

SEC. 760. The Secretary shall set aside for Rural Economic Area Partnership (REAP) Zones, until August 15, 2020, an amount of funds made available in title III under the headings of Rural Housing Insurance Fund Program Account, Mutual and Self-Help Housing Grants, Rural Housing Assistance Grants, Rural Community Facilities Program Account, Rural Business Program Account, Rural Development Loan Fund Program Account, and Rural Water and Waste Disposal Program Account, equal to the amount obligated in REAP Zones with respect to funds provided under such headings in the most recent fiscal year any such funds were obligated under such headings for REAP Zones.

SEC. 761. There is hereby appropriated \$1,000,000 to carry out section 3307 of Public Law 115-334.

Waiver authority.

SEC. 762. The Secretary of Agriculture may waive the matching funds requirement under Section 412(g) of the Agricultural Research, Extension, and Education Reform Act of 1998 (7 U.S.C. 7632(g)).

SEC. 763. There is hereby appropriated \$5,000,000, to remain available until September 30, 2021, to carry out section 23 of



Accredited Certifiers Association  
PO Box 85 Mabel, MN 55954  
(844) 783-7974  
[www.accreditedcertifiers.org](http://www.accreditedcertifiers.org)

February 14, 2019

U.S. Secretary of Agriculture Sonny Perdue  
Department of Agriculture  
Whitten Building  
1400 Independence Avenue SW  
Washington, DC 20250

RE: National Organic Program: Origin of Livestock Regulation

Dear Secretary Perdue:

We write to request your help ensuring the success of organic dairy farmers. The success of this sector depends on consumer trust for the USDA organic seal as well as a level playing field for organic producers. Both of these require consistent enforcement of the USDA Organic Regulations by accredited certification agencies.

The Accredited Certifiers Association represents 55 of these agencies, who are accredited by the USDA to verify compliance to the National Organic Program regulations. Our membership includes programs administered by state departments of agriculture, as well as county level programs and private companies. Nearly all U.S.-based organic certifiers are among our membership. What our members tell us, and what we'd like to tell you, is that there is a problem with consistent interpretation of the regulations related to origin of livestock in organic production systems. This inconsistency presents an unlevel playing field for organic farmers and creates distrust for the USDA Seal among organic consumers. **As such, we are requesting clarification related to 7 CFR 205.236 Origin of Livestock.**

The rule in question, 205.236(a)(2)(iii) states: "Once an entire, distinct herd has been converted to organic production, all animals shall be under organic management from the last third of gestation."

Some certifiers maintain that this conversion must be a one-time event, and that afterward, animals brought onto the operation must be organically raised from the last third of their gestation. This is consistent with the preamble of the December 21, 2000 Federal Register National Organic Program Final Rule, which states: "Finally, the conversion provision cannot be used to routinely bring nonorganically raised animals into an organic operation. It is a one-time opportunity for producers working with a certifying agent to implement a conversion strategy



for an established, discrete dairy herd in conjunction with the land resources that sustain it.”  
(See printed page 80570 linked [here](#).)

However, some certifiers allow continuous transition of non-organic animals, stating that the phrase *distinct herd* is unclear and that 205.236 might not necessarily prohibit continuous transition processes or “re-transition” of young stock as separate distinct herds after a period of non-organic management. Producers who are allowed to utilize a multiple-transition process, or a system that re-transitions dairy calves raised conventionally, are at a significant cost advantage. Specifically, if producers are allowed to manage livestock as conventional for a period of time, and they are not required to use organic feed and other organic management factors for a year before being re-transitioned to organic status, their management costs drop significantly. Many perceive this to be an unfair competitive advantage, contrary to the intention of the regulation, and out of line with consumer expectations. However, when pressed on this issue, the NOP has declined to take action, citing a long and complicated history related to the interpretation of 205.236. This history includes several National Organic Standards Board (NOSB) recommendations that eventually led to a proposed Origin of Livestock rule, which was not finalized and was eventually removed from the government’s Unified Agenda of Regulatory and Deregulatory Actions.

Accredited certifiers would really like to get on the same page as one another about this. The topic is discussed frequently in various forums, but lack of regulatory clarity coupled with diverging past precedents make it extremely challenging for certifiers to switch course from where they are currently. Although our members do not all agree on the interpretation of this regulation as it is currently written, we are in *strong* agreement that once regulatory clarification is provided, we can stand together to enforce the rule consistently to the benefit of the organic dairy industry.

In fall of 2018, the NOSB passed a unanimous resolution, which “urges the Secretary to directly issue a final rule for Origin of Livestock that incorporates public comments submitted in response to the Proposed Rule (Docket Number AMS-NOP-11-0009).”

Please work with the National Organic Program to prioritize strong and consistent enforcement by issuing a final rule that clarifies requirements related to Origin of Livestock. We urge you to move quickly on this issue, and we are willing to discuss the matter further as needed.

Sincerely,



Jennifer Cruse  
Executive Director  
Accredited Certifiers Association

On behalf of the following:



Sarah Costin  
Director  
A Bee Organic Certification

Solomon Meyer  
Certification Program Administrator  
Basin and Range Organics

Don Franczyk  
Executive Director  
Baystate Organic Certifiers

Jody Biergiel Colclough  
Chief Certification Officer  
CCOF Certification Services, LLC

Bernhard Schulz  
CERES GmbH

Stephen K. Nix  
Organic Certification Program Coordinator  
Clemson University Department of Plant Industry

Janis Kieft  
Organic Program Manager  
Colorado Department of Agriculture Division of Plant Industry

Leslie Zuck  
US General Manager  
Ecocert ICO

Terry Hollifield  
Executive Director  
Georgia Crop Improvement Association's Organic Certification Program

Gwen Ayres  
Organic Program Manager  
Idaho State Department of Agriculture

Christina Dockter  
Vice President of Operations  
International Certification Services, Inc.

Megan Clark  
Organic Program Specialist  
Kentucky Department of Agriculture

Theresa Härtl  
Review / Certification  
Kiwa BCS Öko-Garantie GmbH

Emmett Brady  
Marin Organic Certified Agriculture

Cori Skolaski  
Executive Director  
MOSA Certified Organic

Chris Grigsby  
Director  
MOFGA Certification Services, LLC

Georgana Webster  
Organic Program Manager  
Montana Department of Agriculture

Chris Fanta  
Co-Executive Director  
Nature's International Certification Service

Jennifer Gornert  
Director, Division of Regulatory Services  
New Hampshire Department of Agriculture, Markets & Food

Stacy Gerk  
Supervising Inspector  
New Mexico Department of Agriculture

Jessica Terry  
Senior Certification Specialist  
NOFA-New York Certified Organic, LLC

Amanda Brewster  
Executive Director  
OCIA International, Inc.

Andy Hupp  
Certification Program Director  
Ohio Ecological Food & Farm Association

Sam Welsch  
President  
OneCert, Inc.

Connie Karr  
Certification Director  
Oregon Tilth Certified Organic

Susan Siple  
Executive Director  
Organic Certifiers

Kyla Smith  
Interim Co-Executive Director / Certification Director  
Pennsylvania Certified Organic

Aiste Tomkien  
Lawyer of Certification Body  
Public Institution Ekoagros

Tracy Favre  
Global Director, Certification Services  
Quality Assurance International (QAI)

Beth Rota  
Policy and Quality Assurance Manager  
Quality Certification Services

Matt Green  
Environmental Scientist, Plan Industry Section  
Rhode Island Department of Environmental Management (RIDEM) Division of Agriculture

Brandon Nauman  
Director, Food Labeling Programs  
Food and Agriculture Division  
SCS Global Services

Nicole Dehne  
Certification Director  
Vermont Organic Farmers

Brenda Book  
WSDA Organic Program Manager  
Washington State Department of Agriculture Organic Program

Michelle Lawson  
Agricultural and Standards Inspector  
Yolo County Department of Agriculture  
Yolo Certified Organic Agriculture

Cc: Gregory Ibach, Undersecretary for Marketing and Regulatory Programs; Jennifer Tucker, Deputy Administrator, USDA National Organic Program

July 10, 2020

The Honorable Sonny Perdue  
Secretary, United States Department of Agriculture  
Jamie L. Whitten Building, Room 116A  
1400 Independence Ave., SW  
Washington, D.C. 20250

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

Dear Secretary Perdue,

A worldwide COVID-19 pandemic has created unprecedented challenges in 2020. It has revealed vulnerabilities in our national food system, created massive economic disruptions, and killed over 130,000 U.S. citizens. We recognize the critical role USDA has played in supporting farmers, feeding hungry people, and assisting agriculture-related business to operate in this new normal, and we thank you for this work.

At the same time, we also appreciate the vital importance USDA has in continuing to issue rules and update regulations that provide opportunity and certainty in our food system.

Our companies and cooperatives source organic milk from thousands of certified organic dairy farmers across the nation. Ensuring uniform interpretation of organic dairy standards is paramount to the success of organic dairy, from farm to shelf. All producers must operate from the same baseline understanding of the organic regulations. A consistent baseline of compliance with the organic standards creates a strong foundation for true innovation—on farms, in processing, and in marketing and sales methods—that drives healthy and robust competition as businesses seek to satisfy and motivate consumers.

Regrettably, the National Organic Program has failed to provide consistent and clear instruction, to producers and accredited certifiers, on the expectations for how farms transition dairy animals to organic status. The Origin of Livestock standards have for far too long been interpreted inconsistently resulting in unnecessary competitive harm between producers and risking consumer confidence. USDA in 2015 issued a proposed rule on the Origin of Livestock accepting public comment and then again opened another comment period in 2019 to gain additional input. **Commenters were virtually unanimous in support for allowing a one-time event that permits the transition of a conventional herd to organic and thereafter the dairy farm/producer will only source from dairy livestock managed as organic from the last third of gestation.**

As a collection of organic dairy companies and cooperatives that represent a major portion of organic milk in the nation, and consistent with Congress's mandate, we urge USDA and the Office of Management and Budget to move expeditiously to advance a final rule on the Origin of Livestock in accordance with the direction established in the proposed rule.

After numerous stakeholder agency meetings on the topic, two public comment periods, recommendations from National Organic Standard Board meetings, and bipartisan congressional interest in resolving this dairy transition inconsistency, it is not clear to us what might be

hindering the advancement of a final rule. We welcome the opportunity to meet with you to learn about the challenges that are preventing the agency from moving forward.

We stand at the ready to field any questions you may have on organic dairy and look forward to action on this long overdue organic rulemaking effort.

Sincerely,

Bob Kirchoff  
Chief Executive Officer  
CROPP Cooperative | Organic Valley

Ben Klinkner  
Board President  
Westby Cooperative Creamery

Domenic Borrelli  
President, Premium Dairy and Plant Based Food & Beverages  
Danone North America

Esteve Torrens  
Chief Executive Officer  
Stonyfield Farm, Inc

Laura Batcha  
Chief Executive Officer/Executive Director  
Organic Trade Association

Scott McGinty  
Chief Executive Officer  
Aurora Organic Dairy

Tim Joseph  
Founding Farmer  
Maple Hill Creamery

CC: Under Secretary Greg Ibach  
U.S. Representative Collin Peterson  
U.S. Representative Michael Conaway  
U.S. Senator Pat Roberts  
U.S. Senator Debbie Stabenow

October 30, 2020

The Honorable Sonny Perdue  
Secretary, United States Department of Agriculture  
Jamie L. Whitten Building, Room 116A  
1400 Independence Ave., SW  
Washington, D.C. 20250

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

Dear Secretary Perdue,

The recent announcement by the National Organic Program (NOP) to backtrack and initiate yet another proposed rule on the Origin of Livestock is extremely disappointing.

As you well know, the ongoing divergence in certifier's application of the Origin of Livestock creates unmistakable competitive harm among market participants. This failure has long been recognized, and the 2015 proposed rule offered a remedy allowing a one-time event that permits the transition of a conventional herd to organic and thereafter the dairy farm/producer will only source from dairy livestock managed as organic from the last third of gestation.

The 2015 proposed rule garnered strong public and industry support through two comment periods with over 2300 comments and 99% of commenters supporting the general premise of the proposed rule offered by the NOP.

Additionally, there is clear Congressional intent for this rule to be finalized quickly, evidenced by the December 20, 2019 FURTHER CONSOLIDATED APPROPRIATIONS ACT which stated:

SEC. 756. Not later than 180 days after the date of the enactment of this Act, the Secretary of Agriculture shall issue a final rule based on the proposed rule entitled “National Organic Program; Origin of Livestock,” published in the Federal Register on April 28, 2015 (80 Fed. Reg. 23455): Provided, That the final rule shall incorporate public comments submitted in response to the proposed rule.

The enactment of the federal law requiring USDA action on Origin of Livestock was over 300 days ago.

A second proposed rule and yet again another comment period is unnecessary and has not been justified to the impacted industry. There is very little or nothing to be discovered or gained from a second proposed rule on the Origin of Livestock and a third public comment period, especially since the last public comment period was less than a year ago.

We do not agree that the impediments USDA has claimed to have identified would prohibit the immediate issuing of a final rule.

We urge USDA to issue a final rule on the Origin of Livestock without delay.

Sincerely,

CROPP Cooperative | Organic Valley  
Danone North America  
Stonyfield Farm, Inc  
Aurora Organic Dairy  
Maple Hill Creamery  
Straus Family Creamery  
Westby Coop Creamery  
Alexandre Family Farm  
Sheffers Grassland Dairy LLC  
Pleasantview Farm  
Fagundes Dairy  
Harmony Organic Dairy  
Maine Organic Milk Producers  
Dairy Grazing Apprenticeship

Organic Trade Association  
National Farmers Union  
Accredited Certifier Association  
California Certified Organic Farmers  
Pennsylvania Certified Organic  
Oregon Tilth  
Georgia Organics  
Midwest Organic & Sustainable Education Service  
Montana Organic Association  
Tilth Alliance  
Organic Egg Farmers of America

CC: Under Secretary Greg Ibach  
U.S. Representative Collin Peterson  
U.S. Representative Michael Conaway  
U.S. Senator Pat Roberts  
U.S. Senator Debbie Stabenow  
National Organic Standard Board



December 21, 2020

The Honorable Tom Vilsack  
United States Department of Agriculture, Secretary Nominee

**RE: Organic Dairy – Origin of Livestock**

Dear Secretary Nominee Vilsack,

The organic dairy community welcomes the announcement by President-elect Joe Biden of your nomination for Secretary of Agriculture. Your understanding of USDA and demonstrated commitment to our nation's food and agriculture system is proven through years of service and leadership.

As you know, organic dairy holds great promise for family farmers and consumers seeking value added agricultural offerings. Through the National Organic Program (NOP), USDA plays a unique and fundamental role in developing and maintaining organic standards.

Regrettably, there are divergences in how USDA-accredited certifiers apply some organic regulations. This creates extreme gaps in production techniques, competitive harm among market participants, and undermines the [Organic Food Production Act's](#) intention to create uniform organic standards.

A ready example is the lack of consistency and clear instructions on how farms transition dairy animals to organic status, known formally as the **Origin of Livestock** rule. Under your previous USDA leadership, we were encouraged when the department offered a proposed rulemaking on the Origin of Livestock in April 2015. Unfortunately, this rulemaking remains unfinished, a condition that frustrates many in the organic dairy community.

In the last four years, USDA removed Origin of Livestock from the agency's work agenda and let it go dormant until 2019. When additional abuses regarding dairy transitions came to light, organic companies and organic dairy farmers, such as ourselves, elevated the topic to force some congressional and administrative action.

Just over a year ago, thanks to bipartisan and bicameral support from Congress, USDA offered a second comment period on the same 2015 proposed rule. Of the over 2,300 comments, 99% of commenters supported the general premise of the proposed rule, which prohibits a continuous transition scheme.

In late October 2020, the NOP significantly altered course and, to our dismay, suggested pursuing a second proposed rule for Origin of Livestock, which would require a third comment period.

We oppose this action and see it as unnecessary, with little or nothing to be discovered or gained. Furthermore, the rationale provided by NOP for another proposed rule has not been convincing or persuasive, especially within the context of overwhelming support from thousands of

commenters during two comment periods. If a significant concern exists, USDA could address the issue in a final rule on Origin of Livestock.

**Without delay, USDA needs to issue a final rule based on the existing proposed rule and the thousands of comments received.**

In bringing this to your attention, we hope to convey urgency in resolving this ambiguity in the organic regulations—it is of high importance for the organic dairy community.

Again, congratulations on your nomination. We look forward to working with you and welcome an opportunity to connect in the coming weeks.

Sincerely,

CROPP Cooperative | Organic Valley  
Danone North America  
Stonyfield Farm, Inc.  
Aurora Organic Dairy  
Maple Hill Creamery  
Alexandre Family Farm