

July 12, 2016

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

Docket: AMS-NOP-15-0012: NOP-15-06PR

RE: National Organic Program; Organic Livestock and Poultry Practices Proposed Rule

Dear Dr. Lewis:

Smucker Natural Foods appreciates the opportunity to comment on the National Organic Program (NOP) proposed rule to amend the organic livestock and poultry production requirements in the current USDA organic regulations.

Our Company has been involved in the Organic Industry since the beginning of the National Organic Program and I personally served on the National Organic Standards board from 2000-2015. It is critical that we support the process that is in place for recommendations to amend the USDA National Organic Standards.

Smucker Natural Foods strongly supports NOP's efforts to create greater consistency in organic livestock practices. We support the rulemaking process, and recognize that NOP is releasing a proposed rule that is based on 14 years of public input and animal welfare recommendations the National Organic Standards Board (NOSB) unanimously passed in 2011.

The proposed regulations are the result of years of public and transparent work, and they reflect significant stakeholder feedback from consumers, farmers, processors, retailers, veterinarians, and experts in animal welfare and animal science. Although some important changes to the proposed rule are warranted and additional guidance is needed, we are generally in support of the proposal overall because it will clarify and strengthen existing livestock and poultry practice standards in the organic regulations, which, in turn, will better ensure consistent compliance by certified organic operations and respond to consumer expectations and demand.

To improve the clarity and utility of a final rule and ensure a smooth implementation process, we support the comments that were submitted by the Organic Trade Association (OTA). OTA's comments were shaped by a diverse group of certified organic operations and stakeholders including livestock operators, accredited certifying agents, retailers, buyers and product suppliers. We believe OTA's suggested revisions and guidance accurately reflect the perspectives of the organic sector and will improve the existing organic livestock and poultry standards.

Outdoor access is fundamental to the organic regulations, and it is what consumers expect. Organic consumers drive the success of the organic industry by choosing organic products when they shop. Continuing on NOP's scheduled comment process and moving to a final rule are not only necessary to ensure consistent compliance and enforcement of the livestock standards but also critical in maintaining consumer confidence. Erosion of consumer's confidence that organic regulations match their production values will inevitably result in loss of organic sales and will jeopardize the continued success of organic in the marketplace.

We urge USDA to continue its rulemaking process in an efficient manner and issue a final rule as soon as possible.

Respectfully submitted,

Kim Dietz
Senior Manager, Compliance & Industry Relations
Smucker Natural Foods