



NATIONAL ASSEMBLY of STATE ANIMAL HEALTH OFFICIALS

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To: USDA-Veterinary Services, Veterinary Services
Agriculture Marketing Service
National Organic Program

From: Susan Keller, ND State Veterinarian, and President of the National Assembly of
State Animal Health Officials

RE: Comments on Proposed Rule RIN 0581-AD44

The National Assembly of State Animal Health Officials (National Assembly) has asked that I send a letter of support, on their behalf, for the comments which were submitted directly to you by Dr. Annette Jones, State Veterinarian for California. The National Assembly is extremely concerned with proposed rule (RIN 0581-AD44) announced recently by the U.S. Department of Agriculture's (USDA) Agriculture Marketing Service (AMS) regarding changes to the National Organic Program (NOP) and the production of organic livestock and poultry.

The proposed rule seeks to eliminate the use of poultry porches in the production of organically raised eggs. We believe this proposal demonstrates a lack of communication between federal agencies. The poultry industry is still recovering from the largest Foreign Animal Disease incursion the United States has ever experienced caused by the introduction and spread of Highly Pathogenic Avian Influenza (H5N2) during 2015. Prevention of this disease is predicated on implementation of biosecurity barriers, yet this proposal seeks to eliminate those very barriers by allowing exposure to wild birds.

The National Assembly strongly feels that this proposed rule is in conflict with our efforts to educate and encourage use of biosecurity actions to help minimize exposure to wild birds. The proposal eliminates an option farmers have to better protect their flocks, while maintaining organic principles and certification. The proposed rule actually *requires* direct outdoor exposure and contact with birds and animals which is known to be contrary to sound principles of biosecurity and poultry health in general. AMS acknowledges the increased risk, so the fact that this change in the rule is even being considered is a major concern. It must be questioned whether this proposal emphasizes marketing above poultry health, and if, so whether the risk to the entire national poultry industry has been considered. If that is the case, mixing these issues is not a science based nor a logical approach and may contribute to severe unintended consequences.

The National Assembly appreciates Dr. Jones' foresight in bringing this matter to our attention. We support and join with California in asking USDA AMS to earnestly and carefully reconsider this proposed rule.

Sincerely,

Susan Keller DVM
ND State Veterinarian
President of the National Assembly of State Animal Health Officials