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July 13, 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:

The Iowa Organic Association has reviewed the National Organic Program (NOP) proposed rule to amend the organic livestock and poultry production requirements and would like to express the following concerns.

Overall, we believe that comprehensive animal welfare regulations are beyond the scope of the current organic regulations, just like comprehensive food safety regulations are beyond the scope of the organic regulations. Just because comprehensive regulations for animal welfare or food safety are not part of the organic regulation does not mean that we are opposed to these issues. It just means that we believe that it is best to stay focused on our area of expertise. There are already a number of respected animal welfare certification programs available for organic livestock farmers, and many are already choosing to participate in these programs to meet consumer expectations. The additional paperwork, certification/inspection costs, and specialized instrumentation/facilities necessary to comply with the proposed regulation will be a greater burden for the small sized organic producers. We expect that they will discontinue with organic certification as it will take an increased production volume to justify the additional expenses.

An additional problem to adding comprehensive animal welfare regulations to the organic regulation is that there is not uniformity among the current animal welfare programs available. There is much debate about which one "gets it right," or is the best. Cornucopia Institute calls the NOP proposal a 'hodgepodge,' and we agree. For example, why, if farmers can castrate cattle, sheep, pigs and goats, is caponizing proposed to be prohibited? Furthermore, with today's modern broiler breeds, caponization is a nearly non-existent practice, so that part of your proposal is going to affect very few, if any, producers. Whereas details about appropriate timing and methods of dehorning would apply to nearly every dairy producer and is typically part of the other animal welfare certification programs, but this seems to be left out of your proposal. The comments currently posted about the proposal indicate that there is a wide range of perspectives on many of the details of what the animal welfare standards should be. We believe that once these additional animal welfare regulations are adopted, the complaining will continue. Campaigning for revisions and additions will continue. This will take a tremendous amount of time and energy for organic producers and consumers. It would be much simpler to let those who are currently part of animal welfare programs sort it all out and let the producers and consumers make the choice of what standards they support.

As organic producers and consumers, we are concerned about the environment as well as wellbeing of our livestock. Over the course of the past several decades, livestock producers in the state of Iowa have been encouraged to move their animals under roof. Not only was this to provide the livestock with greater comfort and protection, but it was just as necessary to protect the environment. Nearly 100% of manure from roofed livestock facilities can be collected and applied at an appropriate time to crop fields. Manure deposited on soil is nearly impossible to collect, and manure deposited on soil or concrete pads is subject to runoff and entry into our waterways. When manure is able to be contained it is much less likely to pollute the soil and water. Applying manure to crop fields reduces the amount of synthetic fertilizers used by conventional farmers. Research by Dr. Cynthia Cambardella with the USDA ARS National Laboratory for Agriculture and the Environment in Ames, IA shows that fertilizing with manure in an organic crop system produces significantly less nitrogen leaching through drainage tiles when compared to using synthetic nitrogen fertilizer with an equal nutrient content. It is important to environmental health to keep manure out of the places where it is harmful and to apply it in a manner that allows the reduction in the reliance on synthetic fertilizers and the fossil fuels required to produce them.

Iowa leads the nation in organic corn and organic soybean production. A great amount of the organic corn and soybeans we produce is used in organic poultry diets. The USDA Agricultural Marketing Service (AMS) analyzed the potential effects of these new regulations and determined "that up to 90 percent of organic aviaries may transition to cage-free egg production due to marketing opportunities and challenges of complying with the outdoor space requirements." Therefore, AMS "project[s] that this production, which accounts for 45 percent of organic egg production, would likely transition to the cage-free egg market." This is a huge market shock, but AMS did not continue their analysis of how the loss of organic feed demand will affect organic producers in Iowa. We are very concerned about this and think that analysis should be completed first. The majority of organic grain production in Iowa occurs on farms that do not have enough scale to be viable as conventional producers. Loss of demand for organic grain will reduce price and result in organic farmers exiting the business. There is a big focus on water quality in Iowa at this time and converting more farmland to organic production is part of the solution. We need to have continued strong markets for organic feed grains for the economic health and environmental health of Iowa's farms. We hope you first consider these ramifications before adopting the proposed regulation.

Finally, we are concerned about the additional paperwork and certification/inspection expense. It has been found that the current paperwork requirements are already a significant burden to producers. The NOP tried to address this with their Sound and Sensible initiative. It seems that these additional regulations will only make the problems worse. Organic certification staff and inspectors seem to be maxed out and it slows response times and increases costs. We think the extra paperwork burden is going to cause a lot of frustration for all involved in the certification process.

In summary, members of the Iowa Organic Association want organic livestock to be well cared for, wants the environment protected, wants consumers expectations to be met, and wants viable economics for organic products. We believe that organic livestock producers are already making animal wellbeing a priority. There is a great amount of diversity between the various breeds of livestock and the regions of the country in which organic livestock production occurs. We believe that it is important for there to be flexibility to allow organic producers to develop the best system for their situation. We also believe that the current general animal welfare requirements that are part of the organic regulation are adequate, and the existing animal welfare certification programs are able to meet the additional expectations of consumers and producers. Therefore, we ask that the current organic regulations be maintained.

Thank you for hearing our concern and considering this request.

Sincerely,



Matthew Miller, President