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

May 17, 2017

**RE: AMS-NOP-17-0031NOP-15-06A
National Organic Program (NOP); Organic Livestock and Poultry Practices Second Proposed Rule**

Dear Dr. Paul Lewis,

Oregon Tilth urges USDA support for immediate implementation of the USDA National Organic Program's Organic Livestock and Poultry Practices Rule on November 14, 2017.

Oregon Tilth is a leading certifier, educator and advocate for organic agriculture and products since 1974. Our organization is accredited by the USDA to offer organic certification services in accordance with the USDA National Organic Program. Our certification program currently certifies 920 farm operations throughout the United States and internationally, representing over 3,750,000 acres of certified organic land. We certify organic operations in 48 states in the United States.

In the Federal Register notice of May 10, 2017, USDA asks the public to comment on four options presented for this rule. We believe the only option is the first one: *Let the rule become effective.*

The USDA National Organic Program's success is built upon consistent enforcement of the USDA Organic Regulations, and a fair and level playing field for farmers and other operators. These two components help ensure integrity and transparency in the marketplace and are the basis of consumers' trust in the USDA Organic label. The majority of livestock and poultry operations Oregon Tilth certifies strongly support the Organic Livestock and Poultry Practices Rule.

The rulemaking process represents a significant undertaking, with strong stakeholder engagement and input. It reflects a seven-year process involving 6,700 public comments and collaboration with government agencies, such as the USDA Food Safety and Inspection Service, USDA Natural Resources Conservation Service, USDA Animal Plant Health Inspection Service, the Food and Drug Administration, and the Environmental Protection Agency. The National Organic Standard Board recently passed a unanimous resolution in support of implementing this new rule without further delay. As a leading certifier working with 343 diverse organic livestock and poultry operations in 30 different states, Oregon Tilth strongly supports and echoes this request.

The USDA National Organic Program is of vital importance to the United States' agricultural economy and to rural communities, along with a variety of additional stakeholders. Nationally, the organic industry has grown from \$14B in 2005 to \$43.3B in 2015¹, a 209 percent increase. Organic has posted double-digit growth in each



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of the last five years, including 11 percent growth in 2015¹, showing consistent yearly gains and far outpacing the broader agricultural sector.

The bottom line is the organic sector is hiring employees, adding acreage and increasing the economic viability of agricultural communities throughout the country.

These opportunities and successes are built on consumer support and trust.

In April 2017, the Consumer Reports National Research Center reported that 83 percent of consumers who frequently purchase organic products believe that organic eggs should come from hens that have access to the outdoors. The USDA National Organic Program's Organic Livestock and Poultry Practices Rule reflects a thorough and thoughtful process to meet consumer expectations while meeting a consistent standard for all livestock producers.

Thank you for the opportunity to provide comment.

Best regards,

Oregon Tilth

¹ Organic Trade Association's 2016 Organic Industry Survey