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Dec. 2, 2019

Paul Lewis
Standards Division
National Organic Program
USDA-AMS-NOP, Room 2646-So.
1400 Independence Ave. SW.
Washington, DC 20250-0268

RE: Docket Number AMS-NOP-11-0009

Dear Mr. Lewis:

Oregon Tilth would like to thank the National Organic Program for their work on the Origin of Livestock proposed rule change. We support continued efforts to ensure strong, consistent standards for organic dairy production; this is critical to maintaining credibility, improving transparency, and ensuring a level playing field for all certified operations. We urge swift finalization of the rule and implementation effective immediately upon publishing, with the only exception being for currently certified producers with animals in transition being allowed to complete the transition as approved by their certifier.

To reiterate from Oregon Tilth's extensive comments when the NOP first announced this proposed rule in 2015, as well as offer additional input, we believe it is critical the following suggestions are taken into consideration in the final rule to enhance consistency and stringency:

- We believe the final rule should use the term "certified operation" instead of "person" to identify who can have a one-time transition; this would also help with oversight on who is eligible since we can more easily verify if an operation has previously been certified.
- We believe the final rule should not restrict transition timing to exactly 12 months, due to situations where operators may have multiple groups of animals at different points in transition. Requiring all

groups to finish transition at the same time is not necessary from an oversight perspective and is not reflective of real-life situations.

- We believe the final rule should make it clear that third-year transitional crops fed to transitional animals must be produced by the operation transitioning the herd, and cannot be purchased. In addition, the definition of third-year transitional crop should refer to §205.202 instead of only requiring the land to have “had no application of prohibited substances within 2 years prior to harvest of the crop or forage.”
- We support the proposed rule §205.236(a)(2)(v) as it is written; this provides greater transparency and increases the capacity for consistent enforcement through ease of auditability for certifiers.

Additionally, the rise of the organic livestock fiber industry over the last four years ought to be taken into consideration in the rule. The proposed rule equates fiber-bearing animals to animals used for meat production and would not allow organic fiber to be produced from converted animals. However, Oregon Tilth requests that fiber-bearing animals be allowed to transition into organic fiber production. In recent years, the organic regulations have been updated to align dairy and fiber production in other areas such as parasiticide use, so we believe that if transition can be allowed for dairy animals, it should be expanded to also allow for fiber animals. This would put us in alignment with other organic livestock fiber standards around the world, and not further disadvantaging US organic livestock fiber producers.

Oregon Tilth’s approach to the origin of livestock in regards to dairy animals is already in line with the current proposed rule, and we hold all our operations, of all sizes, to the same requirements. As such, once the final rule is published, our certified operations will feel very little effect, apart from the assurance that all other organic dairy operations are being held to the same standard. Overall, this proposed rule will be of great benefit to the organic dairy industry and again we urge swift finalization and immediate implementation.

Respectfully submitted,

Oregon Tilth, Inc.