



470 Lancaster Drive NE | Salem, OR 97301 | www.tilth.org | PH 503.378.0690 | FX 503.378.0809 | organic@tilth.org

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Chief Standards Development and Review Branch
National Organic Program
Transportation and Marketing Programs
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW
Room 4008 South, Ag Stop 0268
Washington, DC 20250

Re: Docket Number AMS-TM-09-0014 : Animal Welfare

Oregon Tilth Certified Organic (OTCO) is a nonprofit research and education membership organization dedicated to biologically sound and socially equitable agriculture. Oregon Tilth offers educational events throughout the state of Oregon and provides organic certification services to organic growers, processors, and handlers internationally. An NOP accredited certifier since 2002, OTCO currently certifies 660 farms and ranches in over 35 states, affording us a broad perspective of current practices and challenges faced by organic producers, as well as the effect that the anticipated successes and challenges this discussion topic will have upon them.

OTCO has reviewed the discussion document regarding animal welfare. Oregon Tilth is supportive of increased regulation for the benefit of animals' welfare and for good animal husbandry. The present regulation addresses many areas of animal husbandry, and those areas are currently enforceable from a certifier's perspective. To move forward, it would best to use the combined experience and efforts of organic livestock professionals to continue this discussion and propose changes if necessary.

However, there is room for improvement or clarity in sections of the present regulation as well. Review of the regulation regarding animal welfare in the organic industry is welcomed, nevertheless, it is recommended that any changes are scrutinized and are evaluated against diverse production regions and major livestock species. Complicated guidance recommendations do not serve the industry well, nor the organic producers. Changes to the regulation should consider how implementation will look at the farm or ranch level. It is important to work with the parties intimately involved with livestock production and not rely largely on trends based on groups outside of production agriculture.

For instance, body condition scoring is a very valuable tool in evaluating animal wellbeing. However, there are different scales available to judge animals of the same breed, as in a scale for dairy cattle and a scale for beef cattle. Not specifying a certain scale could lead to animals being evaluated to many scales and therefore offering inconsistencies. Considerations must also be taken for accurate body condition scoring of a species such as sheep, which requires physical palpation of the back, ribs, or hips to evaluate the animal. Judging

lameness also means that an inspector has to see the entire group of animals move or be handled, in order to adequately assign a number or percentage of lame animals. Specific language for these types of requirements allows producers to know how to comply with the regulations and allows certifiers to implement the same set of requirements across regional, production system, and specie boundaries.

Proposed language changes need to be auditable and enforceable. Asking individuals to evaluate such things as timing or appropriateness of health treatments, pain expression, proper handling, or identifying stress levels in non-activity situations can be very difficult, and this is often not obtainable in an inspection situation. Although these topics are of importance, the difficulty assessing them has to be considered. For instance, without being on site when an animal is ill, it is extremely difficult to assess from written logs or records if treatment of that animal and its illness were administered properly or in a timely manner. In addition, the culling of animals and the humane treatment factors that accompanying these decisions is similarly very situational and site-specific. Also, without seeing an animal during or soon after a physical alteration, is extremely difficult to assess proper techniques unless a physical deformity is apparent.

Oregon Tilth encourages the continued discussion of how the current organic regulation can be altered to address more specific animal welfare and husbandry issues. It is recommended that organic producers, veterinarians, animal scientists, and accredited certifiers collaborate and combine their efforts to ensure that any changes are necessary, clear, and obtainable.