

December 2, 2019

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, D.C. 20250

Dear Secretary Perdue,

The undersigned organizations are unified in our support for the proposed Origin of Livestock Rule. Rulemaking is critical to bring consistent enforcement, maintain a level playing field to all organic dairy producers, and uphold strong organic integrity for all organic farmers. We urge you to quickly review submitted comments and move towards immediate implementation of the Rule.

The Origin of Livestock Rule is needed to uphold consumers' expectations about organic dairy by specifying that organic dairy animals must be raised organically from the last third of gestation or be raised organically for one year if transitioning a conventional herd to organic, which is allowed only once. Once a distinct herd is transitioned to organic, all animals must be raised organically from the last third of gestation. It must be prohibited to cycle dairy animals in and out of organic production.

The delay in issuing a final Rule has resulted in economic harm for organic dairy farmers from low pay prices caused by an oversupply of organic milk enabled and encouraged by loopholes in the current rule. As you are aware, 99% of the original comments to the 2015 Origin of Livestock Rule supported making these same changes. We urge you to ensure the final rule reflects the much-needed clarity requested by the organic dairy producer community and upholds a strong sense of organic integrity.

Both the House and Senate responded to the requests of the organic industry by including bill language in the Fiscal Year 2020 Agriculture, Rural Development, Food and Drug Administration and Related Agency Appropriations Bill requiring USDA to issue a final Origin of Livestock rule within 180 days from the date of enactment. The current rule is inhibiting the National Organic Program's ability to provide consistent and fair enforcement; leaving our nation's organic animal standards unfair and inconsistent.

The strong public-private partnership between USDA and the organic industry has created a foundation that has allowed the industry to grow into a \$50 billion market. This provides economic opportunities for U.S. farmers and businesses and produces one of the most highly trusted labels by consumers.

We respectfully ask you to move quickly to end the five-year wait for legal clarity and consistent implementation of origin of livestock regulations. Organic dairy farmers are suffering, and we have the solution to level the playing field and uphold consumers' expectations with strong regulations. We know you share a desire for strong enforcement and integrity and trust you will act quickly to issue and implement a Final Rule.

Sincerely,

Organic Farmers Association
<< organizations will be added in alphabetical order >>