

June 18, 2020

Dear Member of Congress,

In the FY 2020 appropriations bill, Congress gave the U.S. Department of Agriculture's National Organic Program (NOP) 180 days to finalize a long-delayed rule that will level the playing field for organic dairy farmers. The NOP has now missed this deadline. We urge you to ensure that the agency complies with the law and finalizes the Origin of Livestock rule as soon as possible.

The rule is critical for creating a level playing field for all organic dairy producers and will safeguard the integrity of the organic label. Because the current standard is inhibiting the NOP's ability to provide consistent and fair enforcement, the organic community has worked for many years to close loopholes for how livestock are transitioned to organic production. The Origin of Livestock rule will close the loopholes 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. Cycling dairy animals in and out of organic production must be prohibited, and once a distinct herd is transitioned to organic, all animals must be raised organically from the last third of gestation.

The organic label is one of the most highly trusted labels for consumers. This is due to the strong standards and enforcement behind the label. But failing to close loopholes in the standards that allow practices that do not meet consumers' expectations puts consumer trust in the label at risk. 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 that is enabled by loopholes in the current rule. Because the need to strengthen the standards for organic livestock is so clearly causing harm, when the NOP accepted public comments on this rule in 2015, the vast majority of the original comments supported making these changes.

Congress recognized the need to strengthen the standards and included language in the FY 2020 Agriculture, Rural Development, Food and Drug Administration and Related Agency Appropriations bill requiring the NOP to issue a final Origin of Livestock rule based on the 2015 proposed rule within 180 days from the date of enactment. But that deadline has now passed, and the NOP has not yet finalized the rule.

Organic dairy farmers are suffering and continued delays in implementing this rule will prolong the dire economics facing organic dairy farmers, as well as jeopardize consumers' trust in the organic label. It is past time for the NOP to finalize the rule and provide much-needed clarity requested by the organic community. We urge you to make sure that the NOP complies with Congress' mandate and finalizes the Origin of Livestock rule as soon as possible.

Sincerely,

Organic Farmers Association
National Organic Coalition
Beretta Dairy
California Certified Organic Farmers
Carolina Farm Stewardship Association
Center for Environmental Health
Community Alliance with Family Farmers
Cuatro Puertas
FairShare CSA Coalition
Farm Aid
Food & Water Action
Food Animal Concerns Trust (FACT)
Food Democracy Now!
FoodChain ID
Friends of the Earth
Global Organic Alliance, Inc.
Hanover Co-op Food Stores of NH & VT
Hoosier Organic Marketing Education
iEat Green, LLC
Illinois Stewardship Alliance
International Organic Inspectors Association
Iowa Organic Association
Kanalani Ohana Farm
Lady Moon Farms
Land Stewardship Project
Maine Farmland Trust
Maine Organic Farmers and Gardeners Association
Mensonides LLC. Providence farms.
Midwest Organic and Sustainable Education Services (MOSES)
Montana Organic Association
MOSA Certified Organic
National Family Farm Coalition
National Farmers Organization
National Farmers Union
Natural Grocers
Natural Resources Defense Council
Northeast Organic Dairy Producers Alliance
Northeast Organic Farming Association -- New York (NOFA-NY)
Northeast Organic Farming Association of New Hampshire (NOFA-NH)

Northeast Organic Farming Association of Vermont
Northeast Organic Farming Association- Interstate Council
Northeast Organic Farming Association – Massachusetts
Northern Plains Sustainable Agriculture Society
Northwest Center for Alternatives to Pesticides
Ohio Ecological Food and Farm Association
OneCert, Inc.
Oregon Tilth
Organic Advocacy
Organic Consumers Association
Organic Farmers Agency for Relationship Marketing (OFARM)
Organic Seed Alliance
Organic Seed Growers and Trade Association
Organic Trade Association
OrganicEye
Pasa Sustainable Agriculture
PCC Community Markets
Pennsylvania Certified Organic (PCO)
Provender Alliance
Raw Milk Institute
Rural Vermont
Sammons Custom Farming
Slow Food Western Slope
Socially Responsible Agricultural Project
Sonoma County Farm Bureau
Straus Family Creamery
The Cornucopia Institute
Valley Organic Growers Association
Virginia Association for Biological Farming
Western Organic Dairy Producers Alliance
Wild Farm Alliance