

Results of NODPA Survey on Organic Dairy Replacements Mar/Apr '06

By Ed Maltby

Summary of Survey	
Number of respondents	86
Number of farmer respondents	68
Total number of cows from respondents	4,025
Highest number of cows in herd	350
Lowest number of cows in herd	20
Average number of cows in herd	59

1. Do you think all organic dairy replacements should be organic from the last third of gestation (the last three month's of the mother's pregnancy)? Mark one of the below.

88% Yes, with no exceptions or allowances (NODPA's current position)

7% Yes, but possibly with allowances

4% Yes, but definitely with allowances

1% No, I think organically certified dairy producers should be able to buy youngstock from non-organic sources up to 12 months prior to milk production.

0% No, I think organically certified dairy farms should be able to raise their own youngstock on the farm using non-organic feeds, antibiotics, and other non-organic practices and buy youngstock from non-organic sources up to 12 months prior to milk production.

2. Rate each of the following allowances with:

1 if you absolutely **do not agree**

2 if you could **maybe** accept it

3 if you **definitely want** to see it

Average score:

2.88 **Keep medical care as it currently stands**, allow only medications that are either natural or petitioned and appear on the National List, **with antibiotics prohibited** for any use.

1.35 Allow the use of an NOSB approved **limited list of extra medications, including antibiotics**, for use on organic dairy calves and heifers up to **12 months** of age.

1.18 Allow the use of **any medication, including antibiotics**, on organic dairy calves and heifers up to **12 months** of age.

1.18 Allow the purchase of non-organic animals up to one year before organic milk production if suitable organic replacements can't be found (commercially available clause).

1.19 Allow the purchase of non-organic animals up to one year before organic milk production if suitable organic replacements can't be found, **but** this provision would expire (sunset) in 3 years—i.e. in 2009, after which all replacements would have to be organic from

the last third of gestation.

1.07 Allow all replacements on organic dairy farms to be raised non-organically (non-organic feed, antibiotics, etc) up to one year prior to milk production **and** allow unlimited purchase of non-organic animals up to one year prior to milk production. ♦

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(3) Dairy animals - replacement stock. Once an operation has been certified for organic dairy production, all dairy animals, including all young stock whether subsequently born on or brought onto the operation, shall be under organic management from the last third of gestation.

Given the experience of the past that shows that any holes in the wording will be exploited by those looking to follow the letter but not the spirit of the law, it is imperative that the wording be totally clear and loophole proof.

Although only 15 days were allowed for public comment, a number of entities, including NODPA, are submitting and encouraging comment on this very important issue for organic dairy. There have also been pleas to USDA to extend the very short comment period which has come at the busy spring planting season for the farm community. The proposed rule and background information can be found at http://www.ams.usda.gov/nop/Newsroom/HarveyvJohnns4_06.pdf

Without a consistent standard requiring last third of gestation for all dairy replacements, allowing conventional animals to be continuously brought onto some operations puts all the organic dairy farms that are raising all of their youngstock organically at a severe economic disadvantage. The allowance for continual conversion of conventional animals damages the market for organic youngstock through reduced market demand and lower prices for organic dairy animals.

Conventional youngstock being brought onto operations also belies the trust of organic dairy consumers who expect that organic milk is coming from animals that have not been treated with antibiotics or other prohibited substances nor fed genetically modified or other prohibited feeds. 'No antibiotics' was the top concern of organic dairy consumers in the Natural Marketing Institute survey reported at the recent NOP Pasture Symposium and organic dairy products were noted as being keystone products for consumer confidence and a major steppingstone to additional purchases in other organic categories.

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