

Northeast Organic Dairy Producers Alliance



May 26, 2015

Attention Sam Jones-Ellard
Samuel.jones@ams.usda.gov

By email
Organic Promotion, Research, and Information Order;
Room 3071-S, STOP 0201;
Agricultural Marketing Service, USDA;
1400 Independence Avenue, SW.;
Washington, D.C. 20250-0201

Dear Sam Jones-Ellard,

This letter is to ask for an extension of the deadline for submitting an alternative proposal or a partial proposal to assist with the development of an organic promotion, research, and information program. **We ask that this deadline be extended by 60 days to August 18th 2015 to enable NODPA and other producer organizations to consult with their members at this very busy time of year for most organic farm operations.**

NODPA is the largest organic dairy producer organization in the country with a membership of eight hundred and thirty six organic dairy producers in the Eastern US. NODPA's mission is to **"enable organic dairy family farmers, situated across an extensive area, to have informed discussion about matters critical to the well being of the organic dairy industry as a whole."** NODPA is not aligned with any one processor or cooperative and therefore is able to represent the views and needs of many different farmers.

The establishment of an organic promotion and research program will affect every level of the organic community, especially producers who actually produce the organic foods. On May 5th 2015 the Organic Trade Association published their 50-page application to establish their Generic Research and Promotion Order for Organic. This proposal was written by a committee established by the trade organization with little input from producers to the final document.

NODPA's Mission

To enable organic dairy family farmers, situated across an extensive area, to have informed discussion about matters critical to the well-being of the organic dairy industry as a whole.

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It is our intention to submit a partial proposal. In order to provide a partial proposal that will “assist with the development of an organic promotion, research, and information program” we need to:

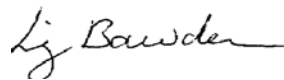
- Analyze the OTA proposal,
- Consult with our producer members,
- Develop a partial proposal,
- Consult with our members and then
- Present a final partial proposal to your office.

Our producer members are busy at the time of year with field work, including planting crops for feed and grazing; harvesting forage for the next winter; reseeding land that has become unproductive or too damaged by the harsh winter and the spreading of composted manure to fertilize the land. Of course, milking cows twice a day, 365 days of the year is part of the regular routine of our members. The time available for field work this year has shortened because of the long winter and late Spring. Unfortunately the submission of OTA’s proposal coincided with the busiest time of year for the majority of organic farmers.

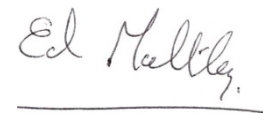
We submit that increasing the time for groups to develop a partial proposal will improve any proposal that the department publishes and assist with educating the commodity group (organic producers) about the potential program. We request that the deadline for submitting a proposal is extended to August 18th 2015.

Thank you for your consideration. Please contact Ed Maltby if you require any more information.

Sincerely



NODPA Board Chair and New York organic dairy farmer



NODPA Executive Director