

Under Secretary Bruce Knight  
Under Secretary for Marketing and Regulatory Programs  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Under Secretary Knight

I am writing to express in the strongest terms Organic Choice Milk Procurement's support for the immediate publication of strict and well defined access to pasture standards.

We want to see the publication of a rule that clearly states the following as a minimum for compliance:

**Access to Pasture standards**

1. Organic dairy livestock over 6 months of age must graze on pasture during the months of the year when pasture can provide edible forage.
2. The grazed feed must provide significant intake for all milking-age organic dairy cows. At a minimum, an average of 30% of the dry matter intake each year must come from grazed pasture during the region's growing season, which will be no less than 120 days per year.
3. Temporary exemption from pasture may be allowed because of:
  - i. Conditions under which the health, safety, or well-being of the animal could be jeopardized, including to restore the health of an individual animal or to prevent the spread of disease from an infected animal to other animals.
  - ii. Short term inclement weather.
  - iii. Temporary conditions which pose a risk to soil and water quality.
  - iv. In no case will temporary confinement and exemption from this pasture standard be allowed as a continuous production system.

The measurement of the consumption of dry matter from grazed pasture will be calculated based on the daily dry matter intake from grazing averaged over the total time period grazed per year.

Our company and our producers across the country support the strictest interpretation of these standards by all organically certified organic dairies. The meeting you had with representatives from the National Organic Coalition, Federation of Organic Dairy Farmers, and WhiteWave Foods showed their support and the support of the whole organic community for the publication and implementation of strict standards. We join with others in the organic industry to publically ask that you use all the influence of your department to speed the publication and rapid implementation of the clarification of the access to pasture rule.

Sincerely



Steven Pechacek  
Organic Choice Milk Procurement CEO  
President/Chair