

## **Comments By Steve Morrison, NODPA President**

Hi, I'm Steve Morrison, a dairy farmer from Maine and President of NODPA, the Northeast Organic Dairy Producers Alliance. Our organization represents over 500 organic dairy farms in the Northeast, and cooperates with parallel organizations in the Midwest and western U.S.

NODPA is here today to support consumers and producers who believe that organic milk comes from dairy cows that have been organic since birth, and have access to quality pasture during the grazing season. We understand that milk from other cows is not to be advertised as USDA Certified Organic.

We are aware that the organic dairy industry has been growing at record rates both in terms of supply and demand for the products. During this period of rapid expansion the National Organic Program was implemented and USDA took on oversight responsibility for certification. The goal of nationalizing the organic standards was in part to assure that consumers were "getting what they paid for" regardless of the state of origin of the product. It was also an effort to level the playing field for producers and bring all farms up to the same base standard of "organic-ness" if you will.

Clearly it hasn't worked. Otherwise this symposium wouldn't be taking place and we all wouldn't be here. Milk from all kinds of farms with and without pasture systems and with various replacement animal programs is being certified as organic. Different certification agencies are interpreting and applying the organic standard quite differently. Some are allowing producers to keep milk cows in feedlots and replace them with heifers started on conventional operations. Other certifiers are requiring access to well managed pasture for all cows, and replacement animals that are raised organically from the last 1/3 of the mother's gestation.

NODPA's primary responsibility is to its farmer members in the Northeast, and to organic dairy farmers nation wide. As part of that we have a certain obligation to deliver a quality product to consumers. It is in all of our best interest to abide by and maintain the strong standards consumers have come to trust and are currently willing to pay a premium for. Any action that compromises the integrity of the standards and leads to a softening in

consumer confidence will be to the long-term detriment of our industry and particularly to our farmers.

The knee jerk reaction of any industry at times such as this when demand is strong and supply is tight is to try to remove barriers to a rapid increase in supply. It is unfortunate that we lost the 80/20 transition rule as a result of the Harvey lawsuit. However, relaxing the organic standard with respect to grazing and replacement animals in order to counter balance the loss of 80/20 will be a short term fix with long term negative impact for the industry as a whole.

NODPA responded to a request by the NOP in 2004 for guidance on evaluating compliance with the “access to pasture” requirement in the organic standard. In the guidance document proposed by NODPA “access to pasture” is quantified in terms of time, dry matter intake, and maximum stocking rate for the season. We propose a minimum 30% DM intake from pasture during the growing season, but no less than 120 days, with a maximum stocking rate that will not lead to soil or water degradation. NODPA producers also overwhelmingly support the requirement that once a farm has gone through its one-time transition to organic, all dairy animals born or brought into that operation shall be raised organically from the last 1/3 of her mother’s gestation.

We, as NODPA producers, have learned through doing it that cows can maintain high levels of production on pasture, well beyond the 30% DM for 120 days, while exhibiting excellent health and breedability. We have also learned since 2002 when the national standards came into effect that we can raise all our replacements 100% organically from the last 1/3 of gestation. We firmly believe that while the location and size of an operation will affect the details of its Organic Farm Plan, that operations of many scales in the US can meet these standards. Currently there are examples of large-scale operations that are reorganizing to come into compliance with the pasture requirement, and at the same time becoming sustainable in terms of raising 100% organic replacements.

Thank you all very much for your time and serious consideration to these matters.