



UNITED TO GROW FAMILY AGRICULTURE

June 9, 2017

Paul Lewis, Ph.D.  
Director, Standards Decision  
National Organic Program, Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave., SW  
Washington, DC 20250

RE: Docket No. AMS-NOP-17-0031; National Organic Program; Organic Livestock and Poultry Practices;  
Second Proposed Rule

Dear Dr. Lewis:

National Farmers Union (NFU) appreciates the opportunity to comment on the Organic Livestock and Poultry Practices Proposed Rule published in the Federal Register on May 11, 2017. NFU is a grassroots general farm organization with nearly 200,000 family farmer, rancher, and fishermen members nationwide. Delegates to NFU's annual convention, through a vigorously debated and democratic process establish NFU's policies. NFU has a strong history of supporting organic agriculture and represents a considerable number of organic producers.

The Organic Livestock and Poultry Practices rules will ensure consistency across the organic label. The National Organic Program (NOP) is a voluntary program that relies on the integrity of the label. NFU policy supports the role of the National Organic Standards Board as the source of developing policies and procedures to interpret and implement the federal standards. The NOSB recommended that USDA address the lack of clarity in organic livestock and poultry standards. Additionally, NFU policy states, "We support maintaining organic livestock production standards that are uniform and account for feeding and animal health care practices for continuous or transitional organic management."<sup>1</sup>

Per the comments submitted on July 13, 2016, NFU strongly supports the final rule regarding Organic Livestock and Poultry Practices and and strongly urges USDA to allow the rule to become effective on November 14, 2017.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Johnson", written in a cursive style.

Roger Johnson  
President

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<sup>1</sup> "Policy of the National Farmers Union," March, 2017. <https://nfu.org/2017-policy/>. At Article I.