



UNITED TO GROW FAMILY AGRICULTURE

January 17, 2018

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

RE: Docket No. AMS-NOP-15-0012; NOP-15-06; National Organic Program (NOP) Organic Livestock and Poultry Practices—Withdrawal

Dear Dr. Lewis:

National Farmers Union (NFU) appreciates the opportunity to comment again on the Organic Livestock Poultry Practices rule published in the Federal Register on December 18, 2017. NFU is a grassroots general farm organization with nearly 200,000 family farmer, rancher and fishermen members nationwide. NFU has many members engaged in organic agriculture, as well as a long history of support for organic agriculture.

NFU is adamantly opposed to the withdrawal of the Organic Livestock and Poultry Practices final rule.

The National Organic Standards Board (NOSB) plays a vital role in setting the standards for the National Organic Program (NOP). The NOSB directed the NOP to issue standards for organic livestock and poultry producers to maintain consistency across the program. The NOP issued the Organic Livestock and Poultry Practices rule with widespread industry support.

The NOP is a voluntary program where producers elect to adopt the standards that maintain consumer confidence. The success of the Program depends integrity in the label. Inconsistent standards threaten the future of the program and the significant investment family farmers have made.

Per the comments submitted on July 13, 2016 and June 9, 2017, NFU strongly supports the final rule regarding Organic Livestock and Poultry Practices and urges USDA to implement the final rule. Thank you for consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Lewis", is written in a cursive style.

Roger Johnson  
President