



June 9, 2017

Paul Lewis Ph.D., Director Standards Division
National Organic Program, USDA-AMS-NOP
1400 Independence Ave., SW
Room 2646-So., Ag Stop 0268
Washington, DC 20250-0268

Docket Number AMS-NOP-17-0031; NOP-15-06A
Regulatory Information Number (RIN) 0581-AD74
Submitted via <https://www.regulations.gov>

Dear Dr. Lewis,

MOSA appreciates the opportunity to provide comments to the USDA's National Organic Program regarding the second proposed rule on organic livestock and poultry practices. MOSA works with over 1900 operations throughout the United States with the majority of our certified entities located in the Upper Midwest. Almost 950 of our operations are certified or in process for certification for livestock, with approximately 700 dairies, 250 poultry, 170 beef, 20 hog, 30 sheep and goat, and a few other livestock species.

MOSA strongly opposes further delay of the effective date and implementation of the Organic Livestock and Poultry Practices (OLPP) final rule. In the notice published on May 10th, four options were put forward as potential next steps for the OLPP rule and our feedback was requested. We fully support option one ***“(1) Let the rule become effective. This means that the rule would become effective on November 14, 2017.”*** Choosing any of the other three options would be a missed opportunity to strengthen our industry.

The OLPP rule will bolster the organic regulations and enable consistency in organic production and among certification agencies. It clarifies the requirements for handling of livestock and poultry to ensure their health and well-being throughout life, including transport and slaughter, specifies which physical alterations are allowed and prohibited in organic livestock and poultry production, and establishes minimum indoor and outdoor space requirements for poultry. This rule represents over a decade of work, including multiple opportunities for public comment. MOSA has diligently gathered data and input from our clients at all stages of the process, and their feedback and support for this rule change have been reflected in our public comments. We believe that the organic community, including its consumers, overwhelmingly support the implementation of this rule.

We acknowledge and appreciate the energy that has gone into providing the organic community with a rule that is clear and enforceable. We recognize the complexity in writing language that is clear, concise, and interpreted as intended. MOSA's Certification Policy Manager is actively participating in an Accredited Certifiers Association working group of certifiers collaborating to develop best practices for implementation of the new regulations. We are striving to facilitate a common understanding of the new rule. As the nation's largest livestock certifier, we want to be certain that our policies and enforcement practices are sound, and are consistent with other certifiers.

As an organization, we have invested significant time and resources into the implementation of the OLPP rule. Collectively, our staff has already spent hundreds of hours making Organic System Plan (OSP) updates and changes to our processes, policies, and training. We remain confident that our hard work to implement this new rule will not be for naught. Although new layers of OSP requirements have been added, our clients will largely be able to comply with the new regulations with minimal or no changes.

In summary, MOSA continues to be in support of the implementation of the new Organic Livestock and Poultry Practices rule. We appreciate the time and energy that has been devoted to developing this rule and look forward to its sensible implementation. We urge the USDA to allow the rule to become effective on November 14, 2017.

Please direct any questions to Jackie DeMinter, Certification Policy Manager.
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Sincerely,
MOSA Certification Team