122 W. Jefferson Street | P.O. Box 821 | Viroqua, WI 54665 PH 844-637-2526 | FAX 608-492-0470 | mosaorganic.org

October 1, 2026

Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standards Board
USDA–AMS–NOP

Submitted via Regulations.gov.

RE: Docket #AMS-NOP-26-0892-0003

NOSB Livestock Subcommittee Discussion on Integrating Livestock and Agroforestry Crops

Dear NOSB Members:

Thank you for the opportunity to provide comments on the NOSB's proposal to revise NOP Guidance Document 5025. MOSA certifies over 1,800 organic operations throughout the United States, including approximately 653 livestock operations, 1,427 crop operations, and 385 handling operations.

MOSA supports the Livestock Subcommittee's proposed revisions to Guidance Document 5025, offering a new lens through which certifiers may provide regulatory oversight for organic operators who integrate livestock and crops.

MOSA's current policy may allow for livestock to access fields producing crops for human consumption in very limited instances where there is little to no risk of those crops coming into contact with the manure. Our policy states:

> *While MOSA wishes there was an accurate and objective way to determine what number of days might be required for a given amount of manure to dissipate, this seems to be an impossible task. Therefore, we defer to the 90/120 rule. Practical exceptions can be evaluated on a case by case basis. For example, the grazing of livestock in fruit trees or other tall, usually woody plants, will be allowed as long as the fruit is out of reach of potential contamination. Fruit on the ground, or within range of likely manure deposits from the grazing species, must not be part of the organic harvest.*

Our current policy also allows for risk assessment according to each individual operation's risk profile. This practice contrasts with the need to verify compliance with the specific regulations for manure application.

MOSA has commented previously to the NOSB that various species of livestock may be requested for this grazing/pasturing, and that the risk profile may be significantly different based on the density of animals kept in a specific location. The species of livestock would likely

have variable risk profiles as well. There may be a need for describing how cross-contamination is prevented; as there may be potential for cross contamination at harvest time or during performance of other tasks.

We propose adding cross contamination between workers and organic products to the Organic Control Points list in Guidance Document 5025.

Thank you for your work on this challenging issue.

Respectfully submitted,

The MOSA Certification Team