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July 15, 2016

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

RE: Docket No. AMS-NOP-15-0012; NOP-15-06PR, RIN 0581-AD44 National Organic Program; Organic Livestock and Poultry Practices

The Oklahoma Cattlemen's Association (OCA) appreciates the opportunity to comment on the United States Department of Agriculture's (USDA), Agriculture Marketing Service's (AMS) National Organic Program's (NOP) *National Organic Program; Organic Livestock and Poultry Practices* proposed rule. OCA represents cattle farmers and ranchers in Oklahoma who work hard daily to provide high quality, wholesome beef products to consumers based upon their preferences whether that be conventional, organic or some other preference.

OCA members do not support the NOP Livestock and Poultry Practices proposed rule and urge that this proposed rule be either significantly revised or abandoned for a new rule process. Specifically, OCA opposes the inclusion of prescribed animal handling/welfare practices and living conditions in the proposed rule. We question whether USDA has the authority to implement regulations which prescribe animal handling and welfare practices since the Organic Foods Production Act does not require nor even mention animal welfare practices, handling procedures or living conditions being a required part of an 'organic plan'. Furthermore, in section 2105 of the OFPA titled "National Standards for Organic Production," Congress specifically identified those practices that must be utilized to qualify livestock for the "organic" label. For a second time in the statute, no mention is made in regards to animal welfare standards, handling requirements or living condition requirements. Therefore, OCA believes that this proposed rule goes far beyond the statutory authority provided USDA in regards to organic programs.

Simply put, organic programs are marketing programs. There is no solid, fact-based evidence that shows organic foods being any better than conventionally raised foods. By placing animal



welfare provisions in the proposed rule, the rule attempts to demonize conventionally raised livestock. OCA understands that consumer questions about the organic program have obviously motivated this proposed rule. However, OCA is very concerned that USDA appears to condone the notion that organic production should be viewed as a better production method. It is unacceptable for a Federal department or agency to give the impression that conventional production of food is not of the same quality as organic production.

As stated above, OCA requests that USDA-AMS revise the rule to remove the requirements based upon animal welfare and handling practices and living conditions or pull this rule and start the process over again. All producers, not just organic producers, should be a part of that conversation to make sure any proposal is justified, sound, and useful to producers and consumers alike.

Sincerely,



Charlie Swanson
President
Oklahoma Cattlemen's Association