



On Oct. 1, 2019, the U.S. Department of Agriculture reopened the comment period for the proposed rule on Origin of Livestock that was originally published on Apr. 28, 2015. The new comment period is open until Dec. 2, 2019 to give interested parties an additional opportunity to comment on the proposed rule.

→ **TAKE ACTION NOW:** <https://ota.com/take-action>

It is critical that USDA hears a unified voice from the organic community that we support rulemaking that clarifies and narrows the allowance for transitioning dairy animals to organic milk production. USDA especially needs to hear from organic dairy farmers that are new entrants to the organic dairy market since the last proposed rule was issued in 2015.

#### BACKGROUND RESOURCES

- [Organic Trade Association Origin of Livestock Fact Sheet](#)
- [Organic Trade Association 2015 comments on the Proposed Rule](#)
- [Organic Trade Association 2019 Dairy Council Letter to USDA](#)
- [National Organic Program Q&A on the Proposed Rule](#)
- [Full text of Proposed Rule published on Federal Register](#)
- [Notice from USDA to reopen the comment period](#)

#### KEY TALKING POINTS

- I/We support the Origin of Livestock Proposed Rule to clarify and narrow the allowance for transitioning dairy animals to organic milk production, while still allowing for a one-time transition of a conventional herd.
- Inconsistent interpretation and enforcement of the current regulations is causing economic harm to organic farmers and threatens the integrity of the organic seal. Rulemaking is critical to bring consistent enforcement and a level playing field to all organic dairy producers.
- USDA must immediately implement a final rule based on the original proposed rule issued in 2015. The organic industry, the National Organic Standards Board and Congress all agree that USDA must issue a final rule that reflects the policies contained in the original proposed rule issued in 2015 and limits the allowance for transitioning dairy animals to organic milk production as a one-time event.

#### OUR ASKS

→ **TAKE ACTION NOW:** <https://ota.com/take-action>

1. [Submit a unique comment](#) (using our talking points if it is helpful) directly to the Federal Register (Docket AMS-NOP-11-0009). We suggest that you attach any previously submitted comments from the original comment period as an addendum to your new comments.
2. If you don't have 5 minutes to craft a unique comment, organic farms can [take 1 minute to use our comment template](#).
3. Encourage others in your network to also [submit comments](#).