



To: The National Organic Standards Board (NOSB) for submission to the National Organic Program (NOP)
From: John Bobbe, Organic Farmers' Agency for Relationship Marketing (OFARM) Executive Director
Date: April 30, 2004

The Organic Farmers' Agency for Relationship Marketing (OFARM) is a farmer marketing agency-in-common. We represent organic field crop cooperatives and farmer marketing associations in a region that spans the major grain producing areas of the United States, over an 18-state area and Ontario, Canada. A number of our member organizations market their farmers' grain into the world market. In addition, OFARM member organization farmers produce organic milk and livestock.

We wish to bring to your attention the following points of concern to our farmer members in maintaining the integrity of the organic industry:

1. The integrity of organic feed and grains must continue to be maintained and the standards strictly enforced. Weather conditions are already stressing crops over a large part of the U.S. pointing to another tight year of feed and grain supplies, especially for livestock. Significant amounts of grains may be imported. Organic standards and certification requirements need to be strictly enforced.
2. Dairy heifers should be raised according to organic standards from the pregnant cow on through to the freshening animal. Organic dairy producers should not be allowed to bring conventional dairy heifers into their herds at any point.
3. The pasture requirements standards should be uniformly interpreted and strictly enforced.
4. The NOP has matters before it that were brought for resolution up to two years ago. NOP's inaction in deciding these matters has the potential to compromise the integrity of "organic" to farmers, consumers and the entire industry. Matters before it should be decided and acted upon in a timely manner.

We respectfully request that NOP act upon matters before it and take necessary steps to protect the integrity of organic grain, dairy and livestock producers because their livelihoods and incomes depend upon it.

Thank you for your consideration.

Sincerely,

John Bobbe, OFARM Executive Director