



CORNUCOPIA  
INSTITUTE

## Send Your Comments to the National Organic Standards Board

**- Due April 10! -**

### Proposed Animal Welfare Standards Could Prohibit Stall Barns

The NOSB, which meets twice a year to advise the United States Department of Agriculture on organic policy and rulemaking, has for years been refining a proposal to strengthen animal welfare standards in organics.

Consumers expect high standards of animal welfare when they pay a price premium for organic products, and these proposed animal welfare standards are generally positive. However, the NOSB needs to hear from you – organic dairy producers – regarding the **indoor space requirements, which are unrealistic for producers with stall barns.**

The Board will vote on the committee's proposal at their next meeting, starting April 26<sup>th</sup> in Seattle. **Please send your comments to the NOSB today** (see instructions below).

### Indoor Space for Dairy Cows

The latest proposal includes indoor space requirements that would essentially outlaw stall barns. The proposed space requirements for dairy cows are as follows:

Weight (lbs)	Indoor Bedded Space (sq. ft. per animal)	Outdoor Runs and Pens (sq. ft. per animal)
Up to 220	15	10
220-440	25	20
440-770	40	30
770-1100	50	40
Over 1100	10 per 220 pounds	8.0 per 220 pounds

According to these requirements, a mature dairy cow weighing 1400 pounds would be required to have a stall space of 63.6 ft.<sup>2</sup> (roughly 8 feet wide and 8 feet deep)– which would be twice as wide as a normal stall. The animals would be able to lie down sideways in tie stalls and every which way in free stalls; imagine the unworkable, unsanitary manure mess!

While some organic dairy barns could possibly be upgraded, most organic producers would have to build new barns to meet these space requirements; a capital investment that many could not afford, forcing them out of the organic business.

The previous recommendation, which has already been accepted by the full NOSB, would already require one traditional stall per animal. Therefore, Cornucopia believes that indoor space requirements for stall barns are unnecessary.

## **Cornucopia's Recommendation:**

### **Indoor Space for Dairy Cows**

1. Indoor space requirements for dairy cows are appropriate in loose housing barns and greenhouses, and the proposed space requirements seem reasonable.
2. Minimum size requirements for stalls are not necessary. Unlike veal calves or furrowing hogs, severe confinement for dairy cows is virtually unknown. The current proposal would make it impossible to manage manure, and protect the health and cleanliness of cattle.
3. Lights should be prohibited from being on 24 hours a day in barns housing lactating animals. A reasonable period of darkness is necessary for humane treatment and preservation of health.
4. The previous recommendation of one stall per animal should be retained to allow the continued use of free stall and tie stall barns. If lights are not kept on, cattle will naturally want to lie down during the night, and they all must have a comparable area to do so.

### **Outdoor Space for Dairy Cows**

1. Standards should specify that cows should be let outside, for a minimum of one hour, at least once per day, for exercise (weather permitting), during the non-grazing season or when appropriate conditions for grazing do not exist. This is especially important for cows in tie stalls and stanchions. There is already a temperature exemption built-in to the standards if wind chills or ice would threaten the health and safety of the animals.
2. During the grazing season, the animals would be "housed" on pasture. For this reason, the standards should specify that "outdoor runs and pens," including improved barnyards, are separate from pasture requirements.

**We have heard diverse comments from Cornucopia farmer-members, which clearly indicate that the NOSB Livestock Committee's proposal is not ready for "prime time."**

**Unless the NOSB Livestock Committee can put together a Herculean effort in Seattle, in collaboration with members of the organic community present, the NOSB will need to postpone final deliberations on their proposal until wider input can be secured from organic livestock producers.**

## **Take Action**

The National Organic Standards Board is especially interested in hearing from producers, so when submitting your comment, please **identify yourself as an organic producer.**

**If you are a producer:** When you submit your comment, share with the NOSB how you currently manage your herd, and if you believe the proposed indoor space requirements are reasonable. If you use stalls, tell the NOSB how you believe these impact your cows' welfare.

**To submit your comment electronically, follow these instructions:**

1. Go to [www.regulations.gov](http://www.regulations.gov)
2. Choose "Submit a Comment"
3. Type "AMS-NOP-11-0014" in the search box
4. Click on "Submit a Comment"

The direct link for submitting comments is

<http://www.regulations.gov/#!submitComment;D=AMS-NOP-11-0014-0001>

Submit your comment before the April 10 deadline.

**To submit your comment via mail (note that comments must be received – not postmarked – before April 10)**

Address your comment to:

Ms. Patricia Atkins,  
National Organic Standards Board,  
USDA-AMS-NOP  
1400 Independence Ave., SW.,  
Room 2646-So., Ag Stop 0268,  
Washington, DC 20250-0268.

Identify the following docket number on your letter: AMS-NOP-11-0014.

**Tell your family and friends to submit their comments as well!**

**To speak in person at the NOSB meeting (important if you can make it):**

In addition to sending their written comments, organic farmers and consumers living in the Seattle area, or willing to travel, are encouraged to also sign up for a five-minute speaking slot at the meeting at the end of April. Individuals can find more information about the meeting, and can pre-register for a slot by April 10, 2011, by visiting “<http://www.ams.usda.gov/nosbseattleslots>” or by calling (202) 720-3252.

Please email [cultivate@cornucopia.org](mailto:cultivate@cornucopia.org) or call 715-514-2627 if you are planning on attending the Seattle meeting.

The [full NOSB proposal](#) is available online, on the National Organic Program website. If you produce other species, please read the recommendation’s standards for other livestock species and find additional action alerts on Cornucopia’s website ([www.cornucopia.org](http://www.cornucopia.org)).

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