



1400 Independence Avenue, S.W  
STOP 0268 – Room 2648-S  
Washington, D.C. 20250-0268

VIA EMAIL

May 18, 2015

Will Fantle  
Research Director  
The Cornucopia Institute  
P.O. Box 126  
Cornucopia, WI 54827  
cultivate@cornucopia.org

Re: Cornucopia Institute's December 2014 complaints based on aerial drone photographs

Dear Mr. Fantle:

Thank you for your correspondence of December 10, 2014, which communicated complaints against fourteen poultry and dairy operations, listed below. Your complaints alleged that each operation is violating the USDA organic regulations requiring outdoor access for livestock. Additionally, your complaints alleged that the dairy operations are violating the regulations requiring access to pasture for ruminant livestock.

NOPC-082-15 Burns Poultry	NOPC-089-15 Chino Valley
NOPC-083-15 Boehning (Hilltop)	NOPC-108-15 Natural Prairie
NOPC-084-15 Aurora Coldwater	NOPC-109-15 Nature Pure (Topaz)
NOPC-085-15 Delta Egg	NOPC-110-15 Smart Chicken
NOPC-086-15 Herbrucks Green Meadow	NOPC-111-15 Krehers Sunrise
NOPC-087-15 Bushman Organic	NOPC-113-15 Redland Dairy
NOPC-088-15 Horizon (Whitewave)	NOPC-123-15 Aurora Dublin

The NOP has reviewed these complaints and has determined that investigation is unwarranted. Each of the currently certified operations is in good standing with its certifier, with no current compliance issues related to outdoor access or access to pasture.<sup>1</sup> Further, the photographic evidence submitted is insufficient to warrant investigation. The photographs depict a single moment in time and do not demonstrate that the operations denied outdoor access to livestock. And, in some cases, NOP was unable to verify that the photographs submitted show the certified operations in question.

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<sup>1</sup> Redland Dairy was no longer certified as of February 2014.

Mr. Fantle

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The NOP will be proposing animal welfare regulations in the near future and invites the Cornucopia Institute to comment, especially in regard to outdoor access for organic poultry.

Thank you for bringing this matter to our attention.

Sincerely,



Matthew Michael, Director  
Compliance and Enforcement Division  
National Organic Program