



The Cornucopia Institute

Organic Dairy Scorecard Scoring Criteria

1. Ownership Structure

Cornucopia considered each dairy brand's ownership structure. We collected this information because ownership structure relates to the control and verification of marketing claims. In practical effect, a farmer who lives and works on their dairy is going to have more control over their supply than a corporate officer coordinating purchasing from dozens or hundreds of individual farms. This is also true of brands that blindly accept the claims of their suppliers of raw milk, or finished products as with private-label brands from other organizations.

The majority of the dairy brands that voluntarily participated in our study are independent and family-owned and produce all of the dairy products they market under their brand. The next highest rated ownership category is family-owned businesses that produce some dairy products themselves and buy raw milk from other family farmers to supplement their own production.

| Ownership structure | |
|---------------------|---|
| 100 | Farmstead dairy (owned and operated by farm family) |
| 90 | Farmer-owned cooperative (or similar) |
| 80 | Family-owned business—close ties/partnership with farmers |
| 70 | Corporate/investor owned—deep roots/ties with farmers |
| 60 | Investor-owned corporations and LLCs |
| 25-50 | Investor-owned corporation with questionable track record |
| 0-25 | Any ownership structure with history as “bad actor” |
| 0 | No answer |

2. Milk Supply

A brand's milk supply is a primary driver in how much control the brand has in conforming to the marketing claims they make in public and to the standards they have articulated in their survey to Cornucopia. Cornucopia finds that brands with strong control over the quality of their raw milk are more likely to produce ethical products. In this respect, hands-on brands that either participate in milk production or have a strong review process and internal standards garner a higher rating.

| Milk Supply | |
|-------------|--|
| 100 | Farmstead dairy—100% of milk from farm. |
| 95 | Farmstead dairy—buys additional milk from neighbors |
| 90 | Cooperative /multiple farms—own patrons |
| 80 | 50% own patrons plus a highly rated supplier |
| 70 | Purchases outside milk from highly rated suppliers |
| 50 | Purchases outside milk without direct control |
| 0-30 | Purchases some percentage of milk from “open market” |
| 0-30 | Purchases some percentage of milk from confinement dairies (depending on percentage) |
| 0 | No answer |

3. Organic Production

Brands that focus exclusively on organic production are generally more dedicated to organic integrity. They truly have “skin in the game.” If the organic label is untrustworthy in the eyes of the consumer, these dedicated brands could lose big. Cornucopia asks for this information to determine a brand's “commitment to organics.” “Split” operations have to juggle keeping organic and conventional products separate. While the practice of organic and conventional production taking place on the same farm is not forbidden under the organic standards, it is a weakness in the USDA standards.

| Organic Production | |
|--------------------|--|
| 100 | 100% organic farm(s), brand does not market conventional |
| 70 | Brand markets both organic and conventional dairy products that come from organic-only or conventional-only operations |
| 60 | Company markets only organic, even though the dairy farms may have both organic and non-organic |
| 40 | Split operations with organic and conventional dairy production on different properties |
| 20 | Split operations with organic and conventional dairy on same property |
| 0 | No answer |

4. Size of Farms

In this set of questions, brands were asked to give information regarding their largest farm suppliers. This data was used to fact check other answers, including whether a farm's pasture would be adequate to support the number of cattle.

| Size of Farms | |
|---------------|---|
| | This information was provided so that Cornucopia could fact-check the brand's other answers and is part of the brand's transparency score |

5. Organic Certification

Cornucopia takes into account a brand's certifier because some have a better track record than others. Certifier scores reflect their treatment of operations that are skirting the law. Certifier policies are also taken into account. In general, Cornucopia gives certifiers the benefit of the doubt until the certifier is caught in some wrongdoing (for example: certifying operations that have been found to be operating illegally).

| Organic Certification | |
|-----------------------|---|
| 100 | Baystate Organic Certifiers |
| 100 | Organic Alliance international |
| 100 | Maine Organic Farmer's and Gardener's Association (MOFGA) |
| 100 | Maryland Dept. of Agriculture |
| 100 | Midwest Organic Services Association (MOSA) |
| 100 | Montana Dept. of Agriculture |
| 100 | Nature's international Certification Services (NICS) |
| 100 | New Jersey Department of Agriculture |
| 100 | Northeast Organic Farming Association (NOFA) |
| 100 | Ohio Ecological Food and Farming Association |
| 100 | Oklahoma Agriculture Department |
| 100 | Organic Crop improvement Association |
| 100 | Stellar Certification Services |
| 100 | Utah Dept. of Agriculture |
| 100 | Vermont Organic Farmers (VOF) |
| 100 | Washington Dept. of Agriculture |
| 100 | Marin Organic Certified Agriculture (MOCA) |
| 100 | Organic Certifiers |
| 100 | International Certification Services (ICS) |
| 100 | EcoCert ICO |
| 100 | A Bee Organic Certified |
| 100 | Global Culture |
| 100 | Organic Certifiers |
| 100 | New Mexico Dept. of Agriculture |
| 100 | OneCert |
| 85 | Pennsylvania Certified Organic (PCO) |
| 85 | New Hampshire Dept. of Agriculture |
| 85 | Natural Food Certifiers |
| 85 | Quality Certification Services (QCS) |
| 85 | Iowa Department of Agriculture |
| 75 | Colorado Department of Agriculture |
| 75 | Texas Department of Agriculture |
| 75 | California Certified Organic Farmers (CCOF) |
| 75 | Quality Assurance international (QAI) |
| 75 | Global Organic Alliance |
| 75 | Oregon Tilth Certified Organic (OTCO) |
| 0 | No Answer |

6. Other Certifications

The USDA organic label is the only federally backed label that verifies how a product was made. While the USDA organic label is important, some third party labels do provide reliable information about a product that the organic label may or may not cover. As already discussed in this report, some of these third-party labels can be misleading. For example, a “Non-GMO” label is redundant if alongside the organic seal, because all organic products are required to be produced without using GMOs or ingredients that were produced with GMOs.

Our rating system is based on the third-party label standards and especially on their oversight. Consumers will find that those labels Cornucopia rates highly add something above and beyond organic certification.

| Other Certifications | |
|----------------------|--|
| 100 | Animal Welfare Approved, Biodynamic Certified (Demeter Association) |
| 90 | Certified Naturally Grown |
| 80 | Salmon Safe, Wildlife Friendly, Predator Friendly, PCO 100% Grassfed Certification |
| 60 | Certified Humane (HFAC), Food Alliance Certified; American Grassfed Certified |
| 40 | American Humane Certified (AHA), Global Animal Partnership, Non-GMO Project Verified |
| 0 | None, no answer |

7. Grass-Fed

As discussed in this report, the market for “grass-fed” dairy is blossoming. All organic dairy cows are required to spend some time on grass, so many organic dairy products advertise as “grass-fed” even if they are not 100% grass-fed. Top scores are given to those brands that have some outside verification that they are truly “100% grass-fed” (note that “100% grass-fed” may still mean these animals eat stored hay or other forage in the winter, along with non-grain supplements).

| Grass-Fed | |
|-----------|--|
| 100 | 100% grass-fed with independent verification of standards or independent requirements and practices that ensure compliance |
| 90 | 100% grass-fed farmstead dairy with individual standards |
| 50-80 | Markets “Grass-fed” or “pasture-raised” and/or has over 50% DMi from pasture during the grazing season (feeds some grain) |
| 40 | Confirmed that the brand meets minimum organic standards for grazing |
| 0 | No answer |

8. Soy-free

Because soy is a common allergen, many consumers are interested in products that are soy-free. Other consumers (as an example, those who follow a diet recommended by the Weston A. Price Foundation) also try to eliminate soy from their diets. This information is provided for consumer benefit without any associated rating. Some dairies feed soy as a protein source. If a brand is 100% grass-fed, it is assumed that brand is also “soy free,” even if they do not advertise as such.

| Soy-free | |
|----------|---------------------------------|
| | Informational only, non-scoring |

9. Pasture

In general, the best animal welfare and pasture quality occurs when you see dairies that allot at least one acre per cow or more (that designation will vary for goat and sheep dairies, given the difference in animal size). In areas that grow exceptionally good grass, two or more cows per acre can possibly be accommodated with excellent management, so location is factored in as part of the scoring equation (as is irrigation for pasture, where necessary).

How a farm grazes their cattle also affects the quality of their milk. For example, many dairies use rotational grazing practices, where larger pastures are split into smaller subsections. These sections are then grazed until the grass is at a certain point, and then the cows are moved to a fresh strip or paddock and the old acreage is allowed to “rest” and regrow. This ecologically sound practice not only prevents environmental degradation but also produces milk with superior nutritional components. Cornucopia stands by the principle that larger farms can graze their cows just as well as small farmstead dairies, given the desire to do so and the requisite management expertise. However, in practical terms it is difficult to graze large numbers of cows.

| Pasture | |
|---------|---|
| 1-100 | Rating is based on the following criteria: a) policies requiring pasture in addition to USDA regulations, (b) enforcement/oversight, (c) amount of acreage available per cow on the brand’s largest farms, (d) average days cows are on pasture per year, (e) permissible exemptions. |

10. Number of Times Milked

It is standard practice for family-scale and organic dairies to milk their cows twice a day. Those dairies that milk three and four times a day are pushing their cows hard to maximize production. This production model requires feeding higher levels of grain and other feed concentrates and impacts how long cows can be outside, grazing on pasture. The welfare of a dairy animal is impacted when they are pushed for high production often resulting in short, stressed, and unhealthy lives.

| Times Milked | |
|--|---------------------------------------|
| The standard is 2x a day; denoted for consumers if non-standard. | |
| 100 | One time per day |
| 90 | Two times per day (standard practice) |
| 25 | Three times per day |
| 0 | Four times per day or no answer |

11. Cull/Death Rate

Although it is not common, healthy and productive cows can and do live beyond ten years of age. In intensive factory farm dairies, a cow's life is truncated by the stress of a high-grain diet and intensive milk production. These industrial cows often only live to be 3 to 5 years old before they are culled (sent to slaughter). One indication of an ethical and productive organic dairy is that they will have surplus young cattle to sell, rather than having to purchase replacements. To Cornucopia researchers, a high cull rate coupled with buying replacements from outside sources raises red flags. This combination could be an indication that the brand's farms are buying conventional heifers, taking advantage of the perceived "origin of livestock" problem. For this rating, Cornucopia took into account planned downsizing (which would make a brand's cull rate look higher than otherwise warranted) and other mitigating factors, including healthcare concerns.

| Cull/Death Rate | |
|--|-------------------------|
| Rating is based on the health and longevity of a farm's cattle, taking into account the farm's slaughter rate/cull rate. | |
| 100 | Under 10% annually |
| 75 | Under 15% annually |
| 15-60 | Over 15% |
| 0 | Don't know or no answer |

12. Replacement Cattle

A "closed herd" is one where the brand's farm(s) raise all their own replacement cattle. In short, the female calves born to the milking herd are used to replace lost or culled stock. This gives the farmer the most control over their stock and exhibits their dedication to organics. It also allows farmers to have close control over their herd genetics and assures a higher level of biosecurity. Purchasing conventional animals and transitioning them to organic production is something Cornucopia downgrades.

| Replacement Cattle | |
|--------------------|---|
| 100 | Closed herd |
| 90 | All replacement animals managed organically from last third of gestation |
| 0-50 | Conventional animals purchased (depending on percentage of herd) |
| 5 | Calves sold at birth and conventional cattle purchased to replace via transitioning |
| 0 | No answer |

13. Calves

Unique ways of managing calves or other young dairy animals include keeping them with their mothers for an extended period of time, using nurse cows, integrating calves in with the dairy herd, etc.

| Calves | |
|--------|---|
| 80-100 | Unique way of managing calves |
| 70 | Remove calf from mother shortly after birth (standard practice) |
| 0 | No answer |

14. Antibiotic Use

In general, antibiotic use is prohibited in organic production. Any cows that need to receive antibiotics for their health must immediately be removed from the milking herd (and they are not allowed to return to the milking herd). However, some certifiers have permitted slight modifications to this prohibition (allowing young stock, prior to a year before being milked, to receive antibiotics). In our opinion this practice is not legal. Cornucopia is also interested in noting those brands that purchase conventional cattle as heifers and rotate them into organic production. These animals may have been lightly administered antibiotics as calves.

| Antibiotic Use | |
|----------------|--|
| 100 | All antibiotic use prohibited |
| 75 | Not regulated by firm (default to some certifier standards where antibiotic use allowed during first year of life) |
| 60 | Milk withheld for one year before considering organic again |
| 25 | Commercial replacement cattle purchased—antibiotic use unknown |
| 5 | Calves are sold (to take advantage of loophole), and managed conventionally for first year of life |
| 0 | No answer |

15. Hormone Usage

Growth hormones are not allowed for use in organic production. However, some reproductive hormones are allowed for therapeutic use. Oxytocin is currently allowed for “use in post-parturition therapeutic applications.” In laymen’s terms, oxytocin is typically used to help cows recover from a difficult birth. Some dairies, however, do not ever use this hormone, even for therapeutic applications.

| Hormone Usage | |
|--|-------------------------------|
| It should be noted that hormones for increasing milk production (genetically engineered bovine growth hormone—rBGH/rBST) are prohibited in organic dairy production. Some farms choose to use therapeutic hormones during reproduction (oxytocin). | |
| 100 | No hormones used on farm |
| 50 | Hormones used therapeutically |
| 0 | No answer |

16. Farm Support

The rating for “farm support” has everything to do with oversight. In the words of one farmstead producer, when asked for how often their farms are visited by company representatives: “We live here.” Characteristically, farmstead dairy producers are with their cows every day and personally supervise the production of the dairy products. Some organizations have a dedicated field staff, or the owner visits with the organic farmers regularly. Others might visit annually or exclusively depend on certification and inspectors (which do not typically verify proprietary standards over and above what the USDA mandates).

| Farm Support | |
|--------------|--|
| 100 | Farmstead dairies (owner farms/lives on-site) |
| 90 | Cooperative/corporation that sets standards and has a staff that visits farms regularly (or similar situation) |
| 80 | Visits a minimum of once a year |
| 60 | Depends on trusted third-party for supervision |
| 5 | No direct supervision/no personal relationship with farm |
| 0 | No answer |

17. Procurement of Dairy Ingredients/Components

Some products are produced using other dairy ingredients or components. For example, some yogurts might require milk powder in their formulation. Because other ingredients or components are part of the big picture in an organic dairy product, it is important to ensure they come from a high-quality organic source. After all, they represent, indirectly, milk production that may or may not be commensurate with the quality of the milk they produce themselves or purchase (to which the balance of these survey questions apply).

| Dairy Ingredients | |
|-------------------|---|
| 100 | Full control—100% of dairy products come from within the organization |
| 90 | Outside purchases are confirmed from other highly rated dairy organizations |
| 50 | Dairy ingredients purchased from a number of different vendors, with less direct control |
| 25 | Purchases from anonymous suppliers—“open market”; purchases internationally |
| 0-24 | Purchases ingredients from confinement factory farms (depending on percentage) or imports |

18. Marketing Area

The marketing area is provided for consumers to assist in finding highly rated brands. This information is included so that consumers can search by their state and also get details about which retailers may carry specific products.

| Marketing Area | |
|----------------|----------------------------|
| | Informational, non-scoring |

19. Extra Credit

Extra credit opportunities emphasized brand transparency and willingness to open their inner-workings to investigators. Transparency is avoided by factory-organic brands and so can be one distinguishing factor between ethical and factory-organic brands.

| Extra Credit | |
|---|--|
| Several questions were asked in addition to the original survey questions that would ultimately give producers “extra credit” points. | |
| 75 | Provide full organic systems plan (OSP) |
| 75 | Provide the contact information and details about every farm supplier instead of just the five largest (if a brand with more than five supplier farms) |
| 100 | With respect to the concern of fraudulent grain imports, this dairy produces 100% of their own feed (including 100% grass fed) |
| 80 | This dairy gets all of their feed from domestic sources |
| 50 | This dairy gets all of their feed from “open source” certified organic feed but were transparent enough to share that detail with us. |
| 25 | This dairy responded and purchases some imported feed and some domestic feed |
| 0 | This dairy purchases only imported feed |