



January 15, 2018

Paul Lewis, Ph.D.  
Director, Standards Division  
National Organic Program  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2642-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket:** AMS-NOP-15-0012; NOP-15-06

**RE: National Organic Program; Organic Livestock and Poultry Practices Final Rule**

Dear Mr. Lewis:

On behalf of 147 community-owned retail food co-ops located in 37 states, with over \$2.1 billion in annual sales and over 1.3 million consumer-owners, I am writing to strongly oppose USDA's proposed action to withdraw the Organic Livestock and Poultry Practices (OLPP) final rule.

Consumer confidence in the USDA Certified Organic seal is foundational to our industry, and the success of National Co-op Grocers' business. Certified organic product comprises roughly 40% of NCG retail grocery stores' total annual sales. Our customers expect organic products to meet or exceed the organic standards, including animal welfare provisions for consistent, meaningful outdoor access and indoor space that allows animals to express natural behaviors.

During the previous OLPP comment period, USDA received more than 47,000 formal public comments. The overwhelming majority of those comments, including NCG's, urged the department to implement the final rule without further delay. The administration's disregard for public input – not to mention ignoring the 14 years of public process policymaking upon which this rule stands – is indefensible.

NCG is a formal declarant on a lawsuit, filed September 13, 2017 by the Organic Trade Association, alleging that USDA is violating the Organic Food Production Act by unlawfully delaying the final rule, which was developed in accordance with public process established by Congress. Our declaration notes NCG's previous public comments:

*While the vast majority of organic producers already adhere to strong animal welfare standards, this rule closes existing loopholes and levels the playing field for organic producers, ultimately ensuring that USDA Certified Organic can continue to meet evolving consumer expectations...*

*Any further delay [of the final rule] could significantly erode consumer trust in the organic label, which is the basis not only for organic's double-digit sales growth, but also fosters a unique, consumer-driven marketplace that allows producers to earn an economically significant premium.*



Organic is a voluntary program that ensures products using the USDA Organic seal meet strict, consistently applied standards and provide consumers with a meaningful choice. If OLPP is withdrawn, the process by which organic standards are developed and enforced will be undermined, and consumer trust in the organic seal will suffer. Strong, consistent organic standards developed through transparent public process – as is the case with OLPP – are critically important to NCG co-ops' businesses, our reputation as organic retailers, and the consumers we serve.

The organic community is united in our support for OLPP, as well as our intention to safeguard our congressionally mandated ability to improve the organic standards through established public process. Withdrawal of the OLPP final rule will irreparably harm consumer confidence in the USDA Certified Organic label. We await the rule's immediate implementation.

Sincerely,

A handwritten signature in black ink that reads "Allie Mentzer".

Allie Mentzer  
Senior Advocacy Manager  
National Co+op Grocers