

**Pasture
Livestock Committee Recommendation
June 7, 2001**

The NOSB Livestock committee puts forth the following proposed wording as a clarification for the present "access to pasture for ruminants" in the Final Rule. The following addresses what we see as the intent, the benefits, the recommended standard and the references in the NOP Final Rule related to the requirement of pasture for ruminants.

Intent:

The intent of requiring pasture for ruminants is to ensure an organic production system that provides a living condition that allows the animal to satisfy their natural behavior patterns, provides preventative health care benefits and answers the consumer expectation of humane animal care. The intent is to incorporate a pasture plan as a required part of the organic livestock system plan.

Pasture management fulfills an integral role in nutrition, health care and living condition requirements of organic ruminant production. Pasturing represents a complex task of applying the organic principles to an organic livestock operation. Pasture management in recent decades has evolved and like organic also requires a management plan for effective implementation.

Organic pasture management reflects a synthesis of crop and livestock production principles that works from the soil up to promote an interdependent community of plants and ruminants. Organically managed pasture should produce the quantity and quality of edible plants suitable to the species, stage of production, and number of animals. Pasture contributes to preventive health care management by enabling ruminants to develop and reproduce under conditions that reduce stress, strengthen immunity, and deter illness. Pasture affords ruminants the freedom of choice to satisfy natural behavior patterns. Pasture assures a relationship between the animal and land that satisfies both organic principles and international standards for organic livestock.

Benefits:

Pasture provides many benefits to the organic livestock farm. Significant benefits gained by pasturing ruminants are in the following areas:

Herd health -- Common benefits associated with pasture are improved feet and leg strength, less breeding problems, lower culling rates and enhanced immunity.

Environmental-Animals walking to pasture saves non-renewable energy, reduce equipment needs, spreads manure out naturally avoiding concentration of manure. Water pollution is a primary concern of organic consumers and concentrated manures from livestock production can be a major source of pollution to water sources.

Production-Pasturing can be as productive as dry lot production. While pasture may not produce record amounts of milk or the fastest growth rate for beef animals, net returns are favorable when all factors are measured.

Consumer expectation-The public comment from the two proposed rules shows a clear expectation that consumers have for pasture for ruminant livestock as part of humane livestock practices. There are food health and safety benefits from pasture produced livestock products that are important to the organic consumer.

NOSB LIVESTOCK COMMITTEE RECOMMENDED STANDARD

ACCESS TO PASTURE FOR RUMINANTS:

1. Ruminant livestock must have access to graze pasture during the months of the year when pasture can provide edible forage, and the grazed feed must provide a significant portion of the total feed requirements. The Farm Plan must illustrate how the producer will maximize the pasture component of the total feed used in the farm system.
2. The producer of ruminant livestock may be allowed temporary exemption to pasture because of:
 - a. Conditions under which the health, safety, or well-being of the animal could be jeopardized.
 - b. Inclement weather
 - c. Temporary conditions which pose a risk to soil and water quality.
3. The producer of bovine livestock may be allowed exemption to pasture during the following stages of production: [Note: recommendation for other ruminant livestock are being developed]
 - a. Dairy stock under the age of 6 months
 - b. Beef animals during final stage of finishing for no more than 120 days

Implementation issues:

Organic pasture management should respond to site-specific conditions by integrating cultural, biological, and mechanical processes that foster cycling of resources, promote ecological balance, and conserve biodiversity. Site-specific conditions in organic pasture management include the area of land available for grazing, the land's pasture carrying capacity, its suitability to accommodate the natural behavior of the herd, and its capacity to recycle the animals' waste. Organic ruminant producers must develop an organic system plan that correlates their intended practices with the site-specific conditions on their operation. Natural variation in climate, topography, precipitation, vegetation, and breed selection may mean organic system plans may vary widely. Nevertheless, because all organic pasture systems will be managed through the consistent application of the fundamental principles of cycling resources, promoting ecological balance, conserving biodiversity and promoting livestock's health and well being.

Organic ruminant producers must manage pasture by prioritizing the use of available resources to meet the nutritional, behavioral, and waste recycling requirements of the grazing herd. Land that normally produces stored feed may have to be converted to pasture to maximize pasture for the corresponding herd size. Producers may use allowed crop production practices such as seeding and the application of approved fertilizers and soil amendments to augment the productivity of their pasture. Conversely, producers may maintain no-input systems that provide ruminants with naturally occurring forage. The amount of producer activity is less important than the requirement that the practices that are implemented are consistent with the standards including conservation of the operation's natural resources. Organic ruminant producers will have to adapt the composition and size of their herd to the site-specific conditions of their operation.

FINAL RULE REFERENCES:

Pasture definition: Land used for livestock grazing that is managed to provide feed value and maintain or improve soil, water, and vegetative resources.

This definition leaves no question that the pasture is not an exercise lot due to the land management issues listed. Inherently this definition requires that adequate acres be supplied for the number of ruminants on the organic farm for the growing season. In order for pasture to maintain or improve soil, water, and vegetative resources it must be managed to avoid overgrazing. Pasture plants, whatever they are, can not be maintained or improved nor can they provide feed value unless the grazing system maximizes growth via the timing of the animals grazing.

Livestock health care practice:

205.238(a) ?must maintain preventative livestock health care practices

Recent studies as well as practical experience by producers show significant benefits for livestock health in diverse areas including feet health, breeding, calving and improved immunity.

205.238(a)3-establishment of appropriate pasture conditions to minimize the occurrence and spread of diseases and parasites

The same practices that assure satisfying the definition of pasture also satisfy this requirement. Modern pasture management utilizes frequent rotation of pasture which can be timed to disrupt parasite and disease cycle.

Livestock living conditions

205.239(a)-must maintain livestock living conditions which accommodate the health and natural behavior of animals

Pasturing ruminants both satisfies this requirement and satisfies the consumer's perception of organic livestock living conditions.

205.239(a)2-access to pasture for ruminants

This standard combined with the definition and the above standards clearly support the requirement listed above.