



Animal Welfare Institute

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May 21, 2012

Ms. Michelle Arsenault, Special Assistant
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., S.W.
Room 2646-S, Mail Stop 0268
Washington, DC 20250-0268

RE: AMS-NOP-12-0017; NOP-12-06; Meeting of the National Organic Standards Board

Dear Ms. Arsenault:

I am writing on behalf of the Animal Welfare Institute (AWI) to offer comments on several animal welfare-related topics currently under discussion by the National Organic Standards Board's (NOSB) Livestock Committee. These topics are covered in the Livestock Committee's Proposed Discussion Documents on guidance for assessing the welfare of poultry, sheep, and bison.

AWI would like to thank the Livestock Committee for its diligent work over the past few years to establish animal welfare standards under the National Organic Program (NOP). We view what has been accomplished thus far as a good start, but only a start. Unfortunately a significant amount of work still remains to be done in order to meet the Board's stated goal of making the Organic program the gold standard for animal welfare.

US – EU Equivalency Agreement

As the Board is aware, the US recently entered into an equivalency agreement with the European Union. Unlike the organic equivalency agreement with Canada, no exception has been made for animal welfare, despite the fact that the US and EU organic standards differ significantly on animal welfare. AWI has conducted an analysis of the animal welfare provisions of the two programs, which has identified dozens of major differences. These discrepancies will give certain US organic producers who raise animals to a lower standard a significant market advantage over EU and other US producers who provide animals with a higher level of welfare.

We understand that the USDA and not the NOSB entered into the equivalency agreement; however, the NOSB has the ability and the authority to propose appropriate changes to the NOP regulations to help close the gap between US and EU organic production in the area of animal welfare.

Guidance Documents on Assessing Animal Welfare

AWI believes there should be a policy governing which issues are covered in regulation, and which in guidance; however, there appears to be no strategy for how animal welfare issues are being

handled. The three guidances for assessing animal welfare that have been presented thus far are organized differently and address different kinds of issues. For example, the poultry guidances cover transport and slaughter, while the guidances for bison and sheep do not. The bison guidance appears to be some sort of industry producer's handbook. It focuses on handling even though handling is merely one aspect of animal welfare. It lacks the same level of scientific documentation found in the poultry guidance (with its 175 footnotes). On the other hand, the sheep document lacks scientific references altogether.

The animal welfare discussion documents appear to cover random issues, and if there is any organization or structure behind this series of discussion documents, it isn't readily evident. It's also not apparent why the Livestock Committee chose to include sheep and bison among the first species to be covered by an animal welfare assessment guide, while beef and dairy cattle are not addressed, other than a score card for dairy. Moreover, the proposed discussion document on outcome scoring only addresses dairy. While AWI strongly supports the development of scoring systems for lameness, body condition, and lesion, we believe that score cards should be attachments to guidance documents for the relevant species and not presented and approved as stand-alone documents, as has been done for dairy cattle.

It will most likely be several more years before the issue of animal welfare under the organic program has been adequately addressed through regulation and guidance. We encourage the Livestock Committee to share with the public and interested stakeholders its strategy for moving forward with this work. Again, AWI commends the Committee and the Board for all its work to raise the level of welfare for animals raised under the organic program, and we offer our assistance as this effort continues.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dena Jones", written in a cursive style.

Dena M. Jones
Farm Animal Program Manager