

# TEXAS DEPARTMENT OF AGRICULTURE

TODD STAPLES  
COMMISSIONER



April 19, 2010

Ms. Toni Strother  
Agricultural Marketing Specialist  
National Organic Program  
Transportation and Marketing Programs  
USDA-AMS-TMP-NOP  
Room 2646-So.  
Ag Stop 0268  
1400 Independence Ave., SW  
Washington, DC 20250-0268

Re: AMS-TM-06-0198; TM-05-14FR

Dear Ms. Strother:

Thank you for considering the comments previously submitted by the Texas Department of Agriculture (TDA) on the National Organic Program (NOP) – Access to Pasture (Livestock) proposed rule. I particularly appreciate USDA working with me to hold a listening session in Texas to hear the concerns of this region first hand. In response to your call for further comments related to the finish feeding of ruminant slaughter stock, please consider the following comments.

As you know, the finishing process is integral to the livestock production industry and I am glad the standards acknowledge the role of finishing in organic livestock production. The TDA supports the inclusion of § 205.239(d) in the final rule, and requests the maximum time frame for finishing be expanded beyond 120 days or one-fifth of the animal's total life. On March 1, 2010, there were an estimated 4.263 million cattle on feed longer than 120 days, according to the USDA Cattle on Feed report. This represented approximately 39 percent of all cattle on feed at the time. Given the high number of cattle kept on feed longer than 120 days, TDA requests the language in § 205.239(d) be amended to allow accredited certifiers the ability to prescribe the length of time allowed for finish feeding to address regional and species-specific differences in finishing practices.

I appreciate the continued opportunity to comment on the proposed amendments to the National Organic Standards. As you continue crafting a flexible program that respects production variances in livestock production, the Texas Department of Agriculture stands ready to assist.

Sincerely yours,

Todd Staples

TS/CJF/cjf

