

Bailey, Melissa

From: Keating, Mark
Sent: Wednesday, September 01, 2010 12:06 PM
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In a friendly contrarian manner, I would like to weigh in on the direction that the Committee is pursuing with its work on the Animal Welfare recommendation. I fully respect your statutory responsibility to advise the Secretary and I don't mean to stick my nose into setting standards – I'm the amoeba in the rulemaking food chain. Like you I've earned my gray hair supporting organic agriculture and I am thrilled with the progress that our community is making. This progress would not be possible absent the NOSB's leadership for nearly twenty years and your role will remain vital, indeed irreplaceable. I'm commenting from the narrow perspective of someone who drafts standards but also from the broader perspective of someone engaged in the effort to clarify and communicate the meaning of organic agriculture.

I believe that the current Animal Welfare recommendation is too quantitative, prescriptive and expansive. We are all familiar with the fundamental premise that organic certification addresses process, not product. Take care of the process, and the product takes care of itself. I would like to point out that there is no historical precedent for the intensive quantification of production standards found in the Animal Welfare recommendation. The primary reason that organic standards have avoided quantitative standards is the site specific nature of individual operations that does not lend itself to generic compliance requirements. Certifying to a process standard is admittedly more slippery and may ultimately provide less consistency than verifying numbers but is the basis upon which the great diversity of operations currently certified were able to make the transition to organic. Excessive emphasis on quantitative standards will definitely detract from the systemic orientation supported by a process-based standard and turn organic production into more of a pass/fail system. This organic production is not; it a system of continuous improvement in which specific outcomes must be weighed against the totality of the system's capability and performance.

I understand the appeal of quantitative standards and the promise of greater clarity and consistency they seem to offer. This potential can be real – the revised pasture standard is a huge leap forward (not without some glitches) and the 30/120 element is an essential component of its brilliance. However, I see significant differences in the manner in which that standard was developed than where we currently stand with the Animal Welfare recommendation. First and foremost, there was a far greater empirical basis derived from years of production experience behind the quantitative components. By comparison, I believe that we are only scratching the surface of that basis with the poultry recommendation (bad pun) and nowhere near it with the other species. I find it incongruous with the evolution of organic

standards and therefore quite precipitous to lock in place a recommendation with this much rigidity, especially for species with little or no precedent under certification.

Final subjective personal observation – we can't tie a neat bow around standards by quantifying desirable outcomes. The success of the pasture standard was a little bit like cat nip, since it does indeed work well in this regard. (I'd like to point out that the 30/120 element, while firm, is not the driving force in the standard. The real genius of that standard is that it gives farmer incentives to build pasture from the soil up – short on land? boost the Dry Matter Content through enhanced fertility – just as Sir Albert Howard would suggest we do) We went back to the quantitative well for the aquaculture recommendation and are drilling a whole new set of wells with the direction the Animal Welfare recommendation is taking. It strikes me that we are being too aggressive in trying to nail down the meaning and status of organic production. I'm not really known for being coy, but there is something to be said for wetting the consumers' appetite with a clear baseline differentiation from conventional production systems and not expecting the organic seal to be the definitive stamp of approval.

This is going to be an ongoing process (it has been already, hasn't it?) so I'm not trying to jump in at the last minute for any tactical reason. It goes without saying that your recommendation will set the agenda and shape the next steps – it's precisely because of this that I have said my piece. I'm sorry that I can't be on Thursday's call due to personal leave time. Unlike many of you, the job here can go on without me. I'll try to be helpful to your process anyway I can, so please let me know if you have suggestions.

Mark