



# ORGANIC FARMING RESEARCH FOUNDATION

December 23, 2008

Submitted electronically via [www.regulations.gov](http://www.regulations.gov)

BOARD OF  
DIRECTORS

Steve Ela  
*President*

Deirdre Birmingham

Casemmie Cole-Kweli

Cynthia Connolly

Heather Darby

Jerry DeWitt

Rick Hartmann

Rose Koenig

Pamela Marrone

Theresa Podoll

Mac Stone

Dorothy M. Suput

John Teixeira

Francis Thicke

Ann Thrupp

EXECUTIVE  
DIRECTOR

Bob Scowcroft

Organic Farming Research Foundation  
Bob Scowcroft, Executive Director  
[www.ofrf.org](http://www.ofrf.org)

Richard H. Mathews  
Chief, Standards Development and Review Branch  
National Organic Program, Transportation and Marketing Programs  
USDA-AMS-TMP-NOP  
1400 Independence Ave., SW  
Room 4008- So., Ag Stop 0268  
Washington, DC 20250

**Re: Docket Number AMS-TM-06-0198; TM-05-14**

Dear Mr. Mathews, et al,

On behalf of the Board of Directors of the Organic Farming Research Foundation, the following comments are hereby submitted.

The Executive Committee of the OFRF Board voted to endorse the recommendations and comments submitted by the FOOD Farmers association (dated Dec. 20, 2008, and attached to this submission as a PDF document). We believe the FOOD Farmers organization has led a very widely inclusive and detailed process. We think their recommendations reflect the broadest possible consensus of the organic community, while providing adequate technical regulatory integrity.

OFRF urges rapid action to publish final regulations concerning access to pasture for dairy animals, which reflect the changes recommended herein. As stated in the attached comments, final regulations concerning the source of replacement dairy animals should not be published at this time, but should be subject to a separate rule-making process.

Sincerely,

Bob Scowcroft  
Organic Farming Research Foundation

Attachment: "OFRF Endorsement of FOOD Farmers Comments" (PDF document)