

Guidelines for Dairy Farms Making the Transition to Certified Organic Milk Production

Vermont Organic Farmers (VOF), Northeast Organic Farming Association of Vermont (NOFA-VT)

The following guidelines are based on the USDA National Organic Standards. Farmers planning to make the transition to organic production should consider all of the following areas and the time that will be required for compliance with the certification standards. It is recommended that interested farmers create a transition plan which would include a timeline from the day that organic practices have been implemented to the day that the products from the farm would be considered certifiable. Typically, this is a one to three year process depending upon what changes need to be made on the farm. Vermont Organic Farmers (VOF) the certifying arm of NOFA-VT, has a series of application deadlines throughout the year. Currently the certification deadlines are April 15, August 15, and January 15.

The first step for a transitioning dairy farm is to contact the NOFA-VT office and sign up as a transitioning farm. Because every farm is different, we encourage you to discuss your plans with the certification administrator or the Dairy Tech Program Coordinator before beginning the transition.

I. Field Practices:

A) Transitioning fields to organic production

In order to be certified organic, crops must be harvested at least three years after a prohibited pesticide, herbicide or chemical fertilizer application.

A farm could still be certified if those fields that do not pass these certification standards are held out of production during the ‘transition period’ until they meet the certification standards. It is possible to leave these ‘transition fields’ fallow or to document the sale of the crop to an off farm buyer. ‘Transition Feed’ must be kept separate from your organic feed when harvesting and storing it. You will need to show the inspector your methods of keeping the two feeds separate at the time of inspection.

If a farm has been purchasing feed from a neighboring farm and that feed meets the certification standards and will continue to be used, that land needs to be certified. This could be done by including the neighbor’s land in the application. *If you include another person’s field(s) in your application, you are taking responsibility for the management of that field and that feed can only be used or sold by you. If that person wants to sell certified organic feed to other people, they should certify their farm under their own farm name.*

B) Buffer requirements

In cases where an adjoining farm is applying prohibited substances to their land (such as pesticides, herbicides, or synthetic fertilizers), an adequate barrier/distance between certified crops and the neighboring farm needs to be in place. Buffer zones need to be 35- 50 feet depending on the boundary line between the two properties. If there is a healthy tree line or hedgerow, 35 feet is adequate. In situations where the boundary line is

open, a 50 foot buffer zone is required. Buffer zones must be maintained for at least three years after the last application of prohibited pesticides or fertilizers on the adjacent land.

C) Soil Fertility

A producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of the soil and minimize soil erosion.

Fertility should be managed through rotations, cover crops, manure, compost, plant residues and applications of approved soil amendments. Non-synthetic mineral amendments (rock phosphate, lime, sul-po-mag, etc.) are allowed. Synthetic soluble fertilizers are prohibited.

D) Seeds

Organic seeds must be used if commercially available. Contact the NOFA office for a list of organic seed suppliers.

II. Dairy Herd Transition Guidelines

Milk or milk products must be from animals that have been under continuous organic management beginning no later than 1 year prior to the production of milk or milk products that are to be sold, labeled or represented as organic.

A) Transitioning the herd; the 80:20 rule

When an entire, distinct herd is converted to organic production, the producer, for the first 9 months of the transition, may provide a minimum of 80-percent feed that is either organic or raised from land included in the organic system. For the final 3 months, 100-percent of the feed must be organic or raised from land included in the organic system. Crops from any 'transition fields' could be used during this one year period provided that they are managed organically.

The NOP requires organic management from the last third of gestation except for an entire distinct herd making the transition. Once an entire, distinct herd has been converted to organic production, all dairy animals must be under organic management from the last third of gestation. "Last third of gestation" refers to the final three months of the pregnancy of the brood cow that will give birth to the organic calf. *Livestock or edible livestock products that are removed from an organic operation and subsequently managed on a nonorganic operation may not be sold, labeled, or represented as organically produced.*

VOF requires all animals on the farm to be managed organically during the transition (with the 80:20 feed exemption) and from then on.

During the one year transition, producers must also follow the standards listed below for feed, health care, living conditions, and record keeping.

III. Livestock Feed

After the transition period, animals must receive 100% organic feed. The producer of an organic livestock operation must provide livestock with a total feed ration that includes organically produced pasture and forage. All animals over 6 months must have access to pasture. Antibiotics, GMO derived products and synthetic preservatives are not permitted in any feed or health care products. Be sure that any mineral supplements do not contain prohibited ingredients (such as mineral oil). Contact the office if you have questions about specific products.

The producer must not:

1. use animal drugs, including hormones, to promote growth
2. provide feed supplements or additives in amounts above those needed for adequate nutrition and health maintenance
3. feed formulas containing urea or manure
4. feed mammalian or poultry slaughter by-products
5. Use feed, feed additives, and feed supplements in violation of the Federal Food, Drug, and Cosmetic Act.

Non-organic milk replacer is not allowed for calves except in an emergency.

IV. Livestock Living Conditions

The producer of an organic livestock operation must establish and maintain livestock living conditions which accommodate the health and natural behavior of animals including

- A. Access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight
- B. Access to pasture for ruminants: All animals over 6 months must be on pasture during the grazing season."
- C. Appropriate clean, dry bedding. *If the bedding is typically consumed by the animal species, it must comply with the feed requirements.*
- D. Shelter designed to allow for natural maintenance, comfort behaviors and opportunity for exercise while also allowing for good ventilation and air circulation.

The producer of an organic livestock operation may provide temporary confinement for an animal because of inclement weather, the animals stage of production, conditions under which the health and safety of the animal could be jeopardized, or risk to soil or water quality.

Manure must be managed in a manner that does not contribute to contamination of crops, soil or water, by plant nutrients, heavy metals, or pathogenic organisms and optimizes the recycling of nutrients.

V. Livestock Health Care Practices

Animal health is the result of ongoing management efforts to create lively soils, provide nourishing forage and feeds, and improve the quality of livestock life. Farmers who follow the organic philosophy believe that an animal, in a healthy, low stress environment, has the built-in ability to heal itself and to ward off attacking organisms. Disease or poor health is often times an indicator that there is an imbalance in the system. The need for use of any medicinals, whether conventional or organic, indicates that the building blocks of animal health mentioned in the organic standards need adjustment.

A. Health Care Plan

Dairy farmers wishing to transition their operations to organic MUST comply with the NOP's Livestock Health Standards for 12 months prior to shipping their milk organically. This means that all synthetic medications are prohibited for use in organic livestock production unless they are specifically included on the National List of synthetic materials allowed for use in livestock production.

The producer must establish and maintain preventative livestock health care practices, including:

1. Selection of species and types of livestock with regard to suitability for site-specific conditions and resistance to prevalent diseases and parasites.
2. Provision of feed ration sufficient to meet nutritional requirements, including vitamins, minerals, protein and/or amino acids, fatty acids, energy sources, and fiber.
3. Appropriate housing, pasture conditions and sanitation practices
4. Conditions which allow for exercise, freedom of movement and reduction of stress.
5. Performance of physical alterations as needed to promote the animal's welfare and in a manner that minimizes pain and stress
 - dehorning of livestock is allowed
 - tail docking is not allowed
6. Administration of vaccines and veterinary biologics

B. Use of Antibiotics

Use of antibiotics is prohibited. In an emergency, a producer should use antibiotics if necessary to save the life of the animal or to prevent suffering. The use of antibiotics must be based on the recommendation of a vet and the VOF office should be notified. This animal must then be sold off the farm. Products from this animal must not be sold as organic.

C. Allowed Synthetic Medications

Allowed sythetic medications are listed on the "Livestock Accepted Health Products List" and the USDA National List. The National Organic Standards Board (NOSB) is also considering the allowance of otherwise prohibited medications on calves (up to a certain age). If this change occurs, you will be notified.

Use of **parasiticides** is allowed only in health care emergencies and in the case of acute and dangerously high levels of infestation. Justification must include the results of fecal tests and for lactating animals there is a 90 day withholding time on the milk.

1. Parasiticides are allowed when preventative practices and veterinary biologics are inadequate to prevent sickness. Must be used 90 days prior to the production of milk or milk products.
2. Routine use of parasiticides is prohibited for dairy stock.
3. Parasiticides are prohibited for slaughter stock.
4. The VOF office must be notified of any use of synthetic parasiticides.

VI. Record Keeping

Up to date written health records and field records are required for certification. *You will be required to supply a years worth of records when you reapply for certification each year.* This verifies your practices and it is believed that keeping records of all health problems and prevention practices can help you graduate from a crisis treatment pattern to good prevention management.

Record keeping requirements include:

- Health Records- condition of the sick animal and all treatments used.
- Field Records- harvest amounts and inputs applied for all fields
- Entering/Leaving Records- record any animals purchased and those that leave the farm.
- Receipt for all purchased inputs should be kept on file.

VII. Origins of Livestock

With the exception of the whole herd transition, all animals must be raised organically from the last third of gestation. This means that a cow from a conventional source must be managed organically for the last three months of their pregnancy if their calf is to be considered organic. The cow would not be considered organic, but the calf would, and must be raised according to the standards. This means that you are expected to raise your own replacements organically or buy organic replacements if you do not raise your own.

VIII. Marketing

While you may be eligible for certification and become certified to sell milk, VOF can not guarantee that a shipper/processor will purchase your milk. It is the individual farmer's responsibility to make that arrangement before they are certified. **NOTE: Shipper/processers that buy organic milk may have their own standards and visit**

requirements in addition to the National Organic Program requirements. Be sure to learn what their requirements are before getting certified.

IX. Economics

It is important for farmers considering the transition to calculate the financial and economic impacts that organic production will have on their operation. This requires analyzing the farm business prior to the transition, as well as making projections using estimates of income and expenses for organic production. Such calculations will shed light on areas of the operation that need to be changed or closely monitored.

The UVM Cooperative Extension Service is one resource to use for help in this area. It would be useful to talk to other farmers who have made the transition and get their experience first hand. You can get a list of VOF dairies from the NOFA-VT office.

X. Resources

NOFA-VT has a Dairy Technical Assistance Program offering information visits, resource listings, articles, books, audio tapes and a farmer-to-farmer mentoring program. In addition, NOFA-VT has a revolving loan fund to provide financing to farmers who are making the transition to organic or sustainable agriculture. Please contact the office if you are interested in either of these programs.