

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

Vermont Organic Farmers (VOF)

Northeast Organic Farming Association of Vermont (NOFA-VT)

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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. Interested farmers should create a transition plan which includes a timeline from the day that organic practices have been implemented to the day that the farm will ship organic milk. This takes a minimum of one year, and can take up to three years, depending on your farming practices. A farm visit from the NOFA Dairy Tech staff is required to help you plan for the transition. Vermont Organic Farmers (VOF), the certifying branch of NOFA-VT, has a rolling admission process for dairy farms applying for certification.

The first step for a dairy farm wanting to transition is to contact the NOFA-VT office and sign up as a transitioning farm. Because every farm is different, you should discuss your plans with the certification administrator or the Dairy Tech staff before beginning the transition. **Once the farm visit is completed and the required paperwork is sent in, you will officially begin the transition process.**

I. Field Practices

A. Transitioning fields to organic production

Fields qualify as organic if at least three years has passed since the last application of a prohibited pesticide, herbicide or synthetic fertilizer.

If some of your fields qualify as organic, but others have had recent applications of prohibited products, your farm may still be able to get certified. Those fields that qualify could produce organic crops, while the fields that still have to go through the rest of their 3-year transition would be considered non-organic. First and second year transitional non-organic feed would be sold on the conventional market and records documenting these sales must be kept. Third year transitional feed can be fed during the transition year (See section II. A.)

If your farm has been purchasing feed from a neighboring farm and will continue to do so, that land needs to be certified as well. Either the neighbor must get certified or you may be able to include the neighbor's land under your certification. **If you include another farm'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 must certify their farm under their own farm name.**

B. Buffer requirements

If 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. The size of the required buffer depends on the method of application of the prohibited material and/or the physical nature of the border (open, hedgerow, etc.) and will be evaluated on a case-by-case basis. The buffer needs to be sufficient to prevent prohibited substances used on the conventional farm from contacting the organic crops.

For example, an organic hayfield immediately adjacent to a conventional cornfield would have to create at least a 50-foot buffer that is left fallow or harvested and sold separately as non-organic hay. **Harvests of buffer hay must be stored separately from the organic hay and sales of buffer hay must be documented as non-organic.** Buffer crops cannot be fed to organic animals. 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

“The primary management goal for organic farmers should be to build healthy soils on their farms. A healthy soil is the foundation for healthy plants, healthy animals, and therefore a healthy farm.”

The NOP Standards state: “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.” [205.203 (a)]

Fertility should be managed through rotations, cover crops, manure, compost, plant residues and applications of approved soil amendments. Non-synthetic mineral amendments with no synthetic additives, such as rock phosphate, lime, Sul-Po-Mag, etc., are allowed. Synthetic soluble fertilizers are prohibited. Manure (including off-farm sources) is allowed. The NOFA office can provide a complete listing of allowed and prohibited fertilizers. If you are unsure if a material is allowed, call the office for confirmation before applying it. Use of a prohibited material would disqualify a field from organic production for 3 years.

D. Seeds

Producers of organic crops are required to source certified organic seed if it is commercially available. If organic seeds are not commercially available, conventional, untreated seeds may be used.

Commercial availability means that the seed is available in the appropriate variety, quality or quantity the producer needs. Cost cannot be used to determine commercial availability. **The producer must document that purchased untreated seed was not available in organic form.**

There is no allowance for seed treated with prohibited materials. Crops grown from treated seeds cannot be sold as organic and the use of treated seed disqualifies the field from organic

production for a period of 3 years. Seed treatments such as inoculants must be approved for use in organic production. Some inoculant products are not allowed for use due to the presence of genetically modified bacteria in the product.

Contact the NOFA office for a list of organic seed suppliers.

II. Dairy Herd Transition Guidelines

There is a **one-time per farm**, one-year transition for all dairy herds converting to organic. During this year, all animals (including young stock) must be managed according to the organic standards. Once the transition starts, you may not continue to transition non-organic animals into the herd. You must either raise your own replacements, or purchase them from other certified organic farms. **During the one-year transition, producers must also follow the standards listed below for feed, health care, living conditions, and record keeping for all animals.**

A. Livestock Feed

Starting with the first day of your transition, all animals must receive 100% organic feed. The 100% organic feed ration can include forages from land in your farm production plan that is being managed organically and is 'certifiable' or in the third and final year of transition.

The NOP standards state:

Any field or farm parcel from which harvested crops are intended to be sold as organic, have had no prohibited substances applied to it for a period of 3 years immediately preceding the harvest of the crop.

Vermont Organic Farmers has interpreted this to mean that if you count backwards 36 months from the date the crop is harvested, the fields should have been free of prohibited substances. Put in another way, you start the 36 month count from the date the last prohibited substance was applied.

Example:

A farmer's last fertilizer application is on May 31, 2004

On May 31, 2005 he (or she) has ended his first transitional year

On May 31, 2006 he (or she) has ended his second transitional year

On May 31, 2007 he (or she) has ended his third transitional year.

This means crops harvested after May 31, 2007 can be certified organic.

The new proposed rule allows farmers to feed third year transitional feed that is part of their farm plan during their one year transition. In the above example, this means that crops harvested **AFTER** May 31, 2006 would qualify as compliant feed during the transition. This also means that if we are discussing pasture, animals would not be allowed to graze these parcels until after May 31, 2006.

All purchased grain and forages must be certified organic. **You must keep all receipts and organic certificates as documentation of these purchases.** The receipt must state the seller's

name, the transaction date and include the amount of product purchased. Again, these receipts must be secured for all purchases to verify the source of feed.

All feed supplements, including minerals and salt blocks must be approved. Antibiotics, GMO derived products, animal by-products and synthetic preservatives are not permitted in any feed 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 or for a list of approved 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.

Calves should be fed whole milk and non-medicated feed. As of April 2006, the NOSB voted to remove non-organic milk replacer from the National List, meaning it is no longer allowed for use under any circumstances.

Three main sources of Certified Organic bulk grain products in Vermont are:

1. Green Mountain Feeds, Bethel, VT – Eric Dutil, 802/234-6278
2. Morrison's Feeds, Barnet, VT – Mike Thresher/Les Morrison, 802/633-4387
3. Blue Seal Feeds, Richford, VT – Robert McCallister, 802/848-7718

Contact the NOFA office for a complete list of dealers who offer organic grain in the Northeast and Canada. We can also provide you with a list of certified organic forages for sale in your area.

B. Pasture

All animals over 6 months must have daily access to pasture during the grazing season. While there are not specific guidelines as to the number of acres of pasture per cow, the animals must be able to obtain a significant portion of their daily feed intake from pasture during the grazing season. The recommended amount of feed from pasture is at least a 30% dry matter intake for a period no less than 120 days.

Pastures must be managed in a way that prevents erosion or water quality problems. In addition, access to streams and rivers must be restricted/managed in order to prevent these problems. Fenced riparian buffer zones are recommended along waterways to stabilize banks and reduce runoff and erosion.

C. Livestock Living Conditions

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

1. Daily access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight. This includes outdoor access in the winter.
2. Access to pasture for ruminants: All animals over 6 months must be on pasture during the grazing season.
3. Appropriate clean, dry bedding. *If the bedding is typically consumed by the animal species, it must comply with the feed requirements and be certified organic.*
4. 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 animal's stage of production, conditions under which the health and safety of the animal could be jeopardized, or risk to soil or water quality. Please note: While animals can be temporarily confined during extremely cold periods, the entire winter season cannot be considered inclement weather as a reason for keeping animals confined.

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.

D. Livestock Health Care Practices

Animal health is the result of ongoing management efforts to create living soils, provide nourishing forage and feeds, and improve the quality of livestock life. Animals must be kept in a healthy, low stress environment that emphasizes prevention. Compassionate awareness of every animal may give rise to the need for health care treatment. Producers must keep written records of all health treatments administered.

It is prohibited for a producer to withhold treatment to maintain organic status of the animal. If an animal must be treated with a prohibited product, such as antibiotics, to save its life, that animal's milk can no longer qualify as organic. The animal must be sold off the farm as non-organic and a receipt must be kept as proof of sale.

1. Health Care

Dairy farmers wishing to transition their operations to organic **must follow the organic health care standards during their one-year transition prior to shipping organic milk**. This means that all health care products with synthetic active ingredients 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 (list available from NOFA).

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 a 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 that 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
 - De-horning of livestock is allowed, but should be done at an early age.
 - Tail docking is not allowed for cows.
6. Administration of vaccines and veterinary biologics. All vaccines are allowed.

2. Use of Antibiotics

Selling, labeling, or representing as organic any animal or animal product that has been treated with antibiotics is prohibited. In an emergency, a producer should use antibiotics if necessary to save the life of the animal or to prevent suffering. Use of antibiotics should be based on the recommendation of a vet. Withholding treatment of antibiotics from animals to maintain their organic status is prohibited.

If a producer uses antibiotics, they must do the following:

- Record the event in their health records.
- **Notify the office of the situation.**
- Segregate the animal to prevent contamination of organic products. For example, a dairy cow must be tagged or separated from the herd to prevent the milk from going in the bulk tank. In addition, milk may not be fed to calves.
- Sell the animal to a non-organic market.
- Document the sale of the animal.

3. Allowed Synthetic Medications

Allowed synthetic medications are listed on the "Livestock Accepted Health Products List" and the USDA National List.

Use of **parasiticides** (de-wormers) are allowed only in health care emergencies and in the case of acute and dangerously high levels of infestation. Parasiticides are allowed when preventative practices and veterinary biologics are inadequate to prevent sickness. There is a 90 day withholding period for dairy cows. Routine use of parasiticides is prohibited for dairy stock. Parasiticides can only be used when methods in the producer's Organic Production Plan (application) do not work. Currently the only synthetic parasiticides allowed for use are Ivermectin and Moxidectin. **Synthetic parasiticides may not be used on animals intended to be sold as organic meat.**

If a producer uses an allowed parasiticide, they must do the following:

- Record the event in their health records including withholding time.

- **Notify the office of the situation.**
- Segregate the animal to prevent contamination of organic products. For example, a dairy cow must be tagged or separated from the herd to prevent the milk from going in the bulk tank. In addition, milk may not be fed to calves.
- If applicable document sale to non-organic meat market.

E. Record Keeping

Written health records and field records must be kept on an ongoing basis. **You will be required to supply a years worth of records when you reapply for certification each year.** This documentation enables us to verify your practices. It is believed that keeping records of all health problems and prevention practices can help you improve your management. VOF has record keeping forms available or you can use your own system.

Record keeping requirements include:

1. Field Records: Date and rate of all inputs applied for all fields and harvest yields
2. Animal Inventory Records: List animals on farm at the start of the transition and update with any animal purchases and those that leave the farm.
3. Health Records: ID and condition of the sick animal and all treatments used
4. Receipts for all purchased inputs. The receipt must state the seller's name, the transaction date and include the amount of product purchased. Valid certificates must accompany the purchase of any certified organic animals and forages.
5. Receipts for vet visits should be kept on file.

F. Marketing

While you may become certified to produce organic milk, we 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/processors 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. While there is currently a strong and growing demand for organic milk, you should check with the companies that buy organic milk to make sure you are close enough to their trucking routes to make it feasible. It is helpful to check in with the milk buyers early to make sure they can purchase your milk when you become certified. Call John Cleary at Organic Valley (612) 803-9087; Cindy Masterman at Horizon (888) 648-8377; Hood, LLC (802) 877-6942; or Bob Stoddard at AgriMark (978) 689-4442.

G. 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.

UVM Extension and the NOFA Dairy Tech Program are two resources to use for help in this area. It is extremely useful to talk to other farmers who have made the transition and get their experience first hand. You can get a list of VOF certified organic dairies from the NOFA-VT office.

In addition, 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.

Contact the NOFA-VT Dairy Technical Assistance Advisors:

- Willie Gibson: 802-535-9067 (cell phone) or email: wgibson@thelifeline.net
- Sarah Flack: 802-933-6965 (home) or email: sarahf@globalnetisp.net
- Lisa McCrory: 802-234-5524 (home) or email: lmccrory@together.net