



VOF 100% Grass Fed Guidelines

Vermont Organic Farmers, LLC (VOF)

Northeast Organic Farming Association of Vermont (NOFA-VT)

VOF Office: 802-434-3821 vof@nofavt.org www.nofavt.org

Introduction

The Vermont Organic Farmers 100% Grass Fed certification program was adopted in response to producer interest and market demand for a third party verification of grass fed production. These standards were adopted from grass fed standards developed by NOFA-NY and PCO with input from Organic Valley. This program is an optional additional certification that is open to all ruminant livestock operations and handlers of ruminant livestock products who are currently certified organic by Vermont Organic Farmers.

Definitions

Browse: Tender shoots, twigs, and leaves of trees and shrubs used by animals for food.

Forage: Any vegetative plant material to be eaten by livestock in fresh, dried, or ensiled form.

Forb: Any herbaceous plant that is not a grass.

Grain: Seed from plants considered cereals including barley, corn, millet, oats, rice, rye, sorghum, soybean, triticale, and wheat.

Pasture: Any forage that is harvested by a grazing animal. An area of land with forage cover from which an animal may graze.

Supplement: An additive intended to provide nutrients that may be deficient in the diet.

Vegetative State (pre-grain): Stage of a plant's life cycle before the development and appearance of grain or fruiting structures.

Section 1. Who Can Apply and Renewal Process

1.1 Only VOF certified organic producers may apply for grass fed certification through VOF. Organic certification must be in good standing when applying for "VOF 100% Grass Fed" certification, and must remain in good standing for the duration of grass fed certification.

1.2 An annual application for renewal and fees will be required to maintain grass fed certification. A renewal form will be sent with the producer's annual renewal of organic certification application and will have the same due date.

1.3 An annual inspection is required and will be conducted together with the annual organic inspection. The extra cost of the grass fed certification will be \$150. If an additional inspection is required, a supplemental inspection fee will be charged.

Section 2. Origin of Livestock

2.1 All requirements of Section 205.236 of the National Organic Program regulations must be in compliance. In addition:

2.2 Meat animals must be fed 100% grass or grass-based feed for the entire life of the animal with the exception of milk prior to weaning. There is no transition period for meat animals.

2.3 Dairy animals must be managed on 100% grass or grass-based feeds for at least 90 days before being eligible to produce "VOF 100% Grass Fed" milk.

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A. The grass fed dairy transition must be completed with the entire herd at one time, including young stock.

B. Once certified as grass fed, additional dairy animals may not be transitioned to grass fed status with the following exception:

1. At the discretion of VOF, an additional group of purchased certified organic dairy heifers may be transitioned to grass fed status provided that the animals will not start lactating before the completion of the 90 day transition period. This exception will be in effect until 6/1/2019 on which date it will be re-evaluated to determine the availability of certified grass fed replacement dairy animals. After 6/1/2019 all purchased replacement animals must be certified to an equivalent grass fed standard unless an extension to this provision 2.3(B)(1) is issued.

C. Purchased lactating dairy animals must be certified to an equivalent grass fed standard.

2.4 If for any reason due to animal health a dairy herd is removed from grass fed certification or the grass fed dairy transition is not completed, an additional transition to grass fed dairy production may be allowed at the discretion of VOF provided that:

A. There is at least one year from the date of discontinuation of grass fed management to the start of the next grass fed transition.

B. The producer provides a plan to VOF to show they are working toward correcting any mineral imbalances in their soil.

C. The producer provides a plan to VOF to show they are working toward improving forage quality and are able to harvest and/or purchase the quantity needed to feed the dairy herd to maintain health under grass fed management.

Section 3. Livestock Feed

3.1 All requirements of Section 205.237 of the National Organic Program regulations must be compliance. In addition:

3.2 Allowed Feedstuffs

A. Grazing and intake from pasture must be maximized as much as possible and animals must have continuous access to pasture during the grazing season.

B. The diet shall be derived solely from forage consisting of grass (annual and perennial), forbs (e.g. legumes, Brassicas), browse, or cereal grain crops in the vegetative (pre-grain) state.

C. Any supplemental feed must be grass-based forages including hay, haylage, baleage, silage, crop residue without grain, or other roughage sources.

D. Grain (corn, soybean, and small grain) plants are allowed to be grazed and/or harvested and fed provided that the crop is harvested before the plant sets grain, or the corn begins to tassel.

E. Fodder sprouts are allowed only in non-grazing season provided that the roots are removed prior to being fed.

Commented [ND1]: This is one area that VOF is looking for comments on. One standard allows both lactating and non-lactating animals to be purchased from organic non-grass fed herds for 3 years from the implementation of their standards (2018).

F. Alfalfa/forage pellets and cubes will be allowed with a daily limit of not more than .05% of an animal's body weight.

Commented [ND2]: Should alfalfa/forage pellets be prohibited or just limited?

G. Young stock may be fed milk prior to weaning.

3.3 Prohibited Feedstuffs

A. All grains and grain by-products (including but not limited to corn, soybean, and small grains), concentrates, meals, and any other non-forage based feedstuff, except as described above in section 3.2. Also see section 4.3 below. Sugar products derived from grain (i.e. rice or sorghum syrup) are not allowed.

3.4 Allowed Supplements:

A. Organic molasses may be used as an energy source.

B. Organically approved mineral and vitamin supplements with the following exception:

1. Vitamin or mineral supplements containing grains as carriers are prohibited.

C. Organic kelp as a mineral source.

D. Organic apple cider vinegar.

E. Any supplements not listed must be approved by VOF prior to use.

Section 4. Livestock Health Care

4.1 All requirements of Section 205.238 of the National Organic Program regulations must be in compliance. In addition:

4.2 Grain or other supplements must not be withheld from a sick animal to preserve its grass fed status.

4.3 If grain or other non-forage based feedstuffs are fed or used for supplementation, the producer must:

A. Document the supplementation and notify VOF immediately.

B. Identify the animal on the animal ID list as not being eligible to be marketed or to have products from the animal marketed as "VOF 100% Grass Fed".

C. For dairy animals, document what was done with the animal to prevent commingling its milk with grass fed milk. Also see section 7.2 below.

4.4 Producers must have consultation with a veterinarian or other ruminant specialist to develop a herd health plan to regularly assess body condition and address health issues.

Commented [ND3]: Other standards do not currently include this requirement but it is likely to be adopted as part of the grass fed collaboration project that includes NOFA-NY, PCO and Organic Valley.

Section 5. Livestock Living Conditions

5.1 All requirements of Section 205.239 of the National Organic Program regulations must be in compliance. In addition:

5.2 Agricultural products used as bedding must be certified organic. Organic straw and corn stalks are allowed, provided there is no noticeable grain residue. Organic hay is allowed. Untreated wood shavings, sawdust or sand are allowed.

Section 6. Pasture Practice

6.1 All requirements of Section 205.240 of the National Organic Program regulations must be met or exceeded. In addition:

6.2 A pasture management plan must be in place to show pasture is being managed as a crop and is being rotated to allow for proper rest and regrowth of the pasture before the animals are reintroduced to the area.

6.3 Pasture shall be managed in a way that will not degrade the soil or quality of the pasture and natural resources with the exception of having a sacrifice area during the non-grazing season.

Section 7. Split Operations

7.1 Grass fed animals intended for meat or dairy may be managed alongside certified organic non-grass fed animals provided that:

A. An identification system is in place that clearly identifies grass fed and non-grass fed animals, and grass fed status must be reflected on the animal list.

B. There are management practices in place to prevent misrepresentation of non-grass fed livestock as grass fed.

7.2 There may not be grass fed and non-grass fed lactating dairy animals on the same farm. If a grass fed lactating dairy animal loses its grass fed status, it must be removed from the farm.

7.3 A grass fed certified operation may grow or purchase grains to feed to non-grass fed certified animals on the same farm provided that there is a plan in place to prevent the grain from being fed to the certified grass fed animals.

Section 8. Handling of Grass Fed Products

8.1 All requirements of Section 205.270 of the National Organic Program regulations must be in compliance. In addition:

8.2 Multi-ingredient products labeled as "VOF 100% Grass Fed":

A. Must not contain any ruminant livestock product ingredients that are not in compliance with this standard.

B. All other ingredients must comply with NOP regulations for product composition if applicable.

8.3 Procedures must be in place to prevent commingling of certified grass fed and non-grass fed livestock products or ingredients not in compliance with this standard.

A. Use of a grass fed certified slaughter facility is not required.

Section 9. Labeling of Grass Fed Products

Commented [ND4]: Should we require 60% dry matter intake from pasture and require that the grazing season be a minimum of 150 days? VOF has already determined that 150 days is a typical grazing season in Vermont.

9.1 All requirements of Section 205.301 of the National Organic Program regulations must be in compliance.

9.2 The "VOF 100% Grass Fed" term or seal may only be used to represent products produced in compliance with and certified under the "VOF 100% Grass Fed" standards.

9.3 The "VOF 100% Grass Fed" logo may only be used by "VOF 100% Grass Fed" certified producers.

9.4 All labels and marketing materials containing the "VOF 100% Grass Fed" logo must be submitted to the certification office for approval prior to printing. If VOF has reason to believe that unauthorized use of the "VOF 100% Grass Fed" logo has occurred, VOF will conduct an investigation and if applicable, pursue legal action.

Commented [ND5]: Should VOF develop our own grass fed logo? It is likely that there will be a grass fed logo available in 2018 that VOF could adopt. The shared logo would come from a collaboration project that includes NOFA-NY, PCO and Organic Valley.

Section 10. Compliance & Appeals

10.1 Operations certified as "VOF 100% Grass Fed" shall abide by the terms set forth in these standards. If VOF should find that an operation is not in compliance with these standards, a written notification will be sent to the producer and the producer will be given time to correct the noncompliance. Once all areas of noncompliance have been resolved and responded to, the producer will receive a notice of resolved noncompliance.

10.2 If a producer is unable to comply with these standards or a noncompliance is not correctable, VOF may issue a notice of denial of grass fed certification to an operation seeking certification, or notice of proposed suspension or proposed revocation to a currently certified grass fed operation.

10.3 If a producer is not able to correct the noncompliance in the given timeframe stated in the proposed suspension or proposed revocation, or fails to submit a plan to correct the noncompliance, or fails to file an appeal, VOF may send the operation a written notice of suspension or revocation.

10.4 An operation has the right to appeal an adverse action decision made by VOF within the given timeframe stated in the written notice, but not more than 30 days after the receipt of the notice, whichever is later. The appeal letter must state the reason why the producer does not believe the adverse action decision was appropriate in accordance and with applicable reference to the above "VOF 100% Grass Fed" standards.

10.5 The appeal letter will be reviewed by VOF and a decision made to sustain or deny the appeal within 30 days of receipt of the appeal letter. The producer will then be notified of the decision in writing. All appeal decisions made by VOF in accordance with these standards are final.