

**Public Comment, 2020 Fall NOSB meeting
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My name is Melody Morrell, and I am a director at The Cornucopia Institute.

A stated purpose of the Organic Foods Production Act of 1990 (OFPA) is to assure consumers that organically produced products meet a consistent and uniform standard. Instead, and to the great frustration of organic consumers, we find industrial organic production and authentic organic production bearing the same seal.

Organic dairy production is a case study in the pernicious influence of industrial agriculture combined with a failure of the USDA to protect the integrity of the organic label.

Factory organic dairies have interpreted loopholes into the regulations that allow for continuous transition of conventional animals. They can sell their own organic calves at a premium and buy cheaper conventional yearlings raised on antibiotics and milk replacer. We are all aware of the problem.

As the Origin of Livestock Rule languishes, the organic dairy market value has acquiesced to artificially low prices resulting from cynical industrial practice.

Dairy farmers who work hard to maintain their organic integrity have come before the NOSB and the NOP again and again, asking for a level playing field.

In the absence of a meaningful rule change, industrial dairy itself has now provided an elegant, if repugnant, answer.

Aurora Organic Dairy is poised to open an organic heifer factory that will house 7,000 animals on 1,900 acres in the arid High Plains of Colorado.

The heifers will come from Aurora's milking operations at five months of age. They will then become replacement animals on Aurora's dairy operations and presumably some number of them will be sold at premium prices to other dairies.

All of this "organic" livestock production is set to happen in the heart of Dust Bowl country, even as climate change makes drought a future certainty.

OFPA reminds us that organic production "is managed to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity."

The cynical "organic" production performed by Aurora and other industrial dairies relies on off-farm inputs, feedlots, and manure lagoons. The water for this operation will come from the depleted Ogallala Aquifer. The water table has fallen so low in the High Plains that rivers have dried up, but this operation is planning to irrigate pastures and water 7,000 heifers with the remains of the ancient reservoir. The grasses in the pasture will likely be annuals that survive only because of this irrigation. There will be no conservation of biodiversity; there will be no ecological benefit at all.

This is not the consistent standard consumers believe they are getting when they choose organic dairy. This is a perversely efficient end-run around organic.