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May 10, 2017

Paul Lewis Ph.D., Director of Standards Division  
National Organic Program, USDA-AMS-NOP  
1400 Independence Ave. SW.  
Room 2642-So., Ag Stop 0268  
Washington, DC 20250-0268

Re: Docket number AMS-NOP-17-0031; NOP-15-06A, and Regulatory Info. No. (RIN) 0581-AD74

Dear Dr. Lewis,

Baystate Organic Certifiers is a USDA-accredited certifier of more than 400 organic producers and handlers. The USDA has requested input on which of four options it should pursue regarding the Organic Livestock and Poultry Practices Final Rule (FR), published in the Federal Register on January 19, 2017, by USDA's Agricultural Marketing Service.

This rule was drafted in response to inconsistent interpretation of the National Organic Standards as they were applied to certified livestock operations. A tremendous amount of work and effort, including input from all stakeholders, has gone into the development of the rule, and we feel that the rule represents the spirit and intent of the Organic Foods Production Act.

We feel the rule is important for the sake of organic producers, who need a clear and level playing field to operate in; and it is important for consumers, who will lose confidence in the integrity of the organic standards if rule is not implemented.

We strongly support option (1): Let the rule become effective on November 14, 2017.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Franczyk", written over a white background.

Don Franczyk  
Executive Director