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**Congress of the United States**  
**House of Representatives**  
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July 27, 2016

COMMITTEE ON  
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ASIA AND THE PACIFIC

The Honorable Thomas J. Vilsack  
Secretary of Agriculture  
U.S. Department of Agriculture  
Washington, D.C. 20250

Dear Secretary Vilsack,

Georgia is home to a thriving agriculture sector, with approximately one in seven Georgians employed in some facet of the industry. While Northeast Georgia is better known as the poultry capital of the world, we also have a significant number of cattle producers. In fact, 3,875 farms raise an estimated 193,000 head of cattle in the Ninth District. Therefore, any proposed changes that could affect the livelihood of these farmers and ranchers are a very serious matter.

To that end, I am extremely concerned with the Agricultural Marketing Service's proposed rule (RIN 0581-AD44) to amend organic livestock and poultry production requirements. While I have previously written you about the effect of this rule on the poultry industry, the proposed rule also has the potential to create a large and burdensome impact on organic cattle producers.

The proposed rule, announced on April 6, 2016, would change practices for organic livestock and poultry, including instituting arbitrary animal welfare standards for conventionally produced beef. The Agricultural Marketing Service has claimed that the changes to the National Organic Program are necessary and that "by strengthening standards for organic livestock and poultry, we are ensuring that we meet consumer expectations and maintain the integrity of the organic seal to support the sector's continued growth. This proposal sets clear standards for organic animals, providing clarity to organic operations and certifying agents, and establishing a level playing field for all producers."

However, if implemented, this rule would establish welfare standards that would mislead consumers by supporting standards that are neither based in science nor necessary for animal well-being. America's farmers and ranchers produce some of the safest supply of beef in the world. Animal welfare and safety is the number one priority for these workers whose livelihoods depend on the health of their stock.

A large part of the cattle industry's job involves making sure that their products are safe and wholesome for consumers; this is a goal of both organic and conventional growers alike.

Unfortunately, the proposed rule relies on marketing techniques instead of sound science at the expense of both the cattle industry and consumers.

I strongly support those who wish to grow organically in Northeast Georgia and across the country, however I believe it is important to remember that organic programs are primarily marketing programs, not food safety tools. Marketing programs are not the avenue by which to issue animal welfare proposals. Additionally, the rule is written in such a way as to nearly condemn conventional cattle production, despite the rigorous health and safety standards that exist. By implementing secondary animal welfare standards for organic programs, the USDA is intentionally misleading consumers into thinking these standards are handled in a different method than those for conventionally produced beef, which is simply not the case.

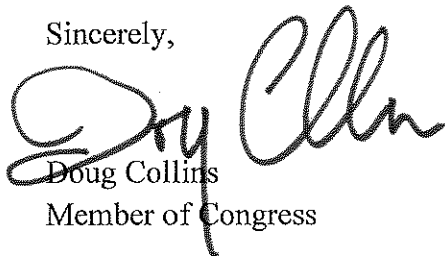
While I acknowledge and appreciate the short extension of the comment period on this issue, I continue to believe the comment period should have been kept open for a longer period of time given the complexity of the rule. I strongly urge the USDA to review and reconsider this proposed rule and its impact on the livestock industry. I am concerned that rather than providing greater certainty, it will only result in confusion and misinformation for consumers, all while harming conventional and organic livestock producers.

The Beef Quality Assurance program already sets a high quality standard for the welfare of our livestock. It is a program that is continuously updated as technological and scientific advances in health and animal nutrition are discovered. Proven standards metrics exist, but this proposed rule ignores them. It is an ill-conceived attempt that would burden the cattle industry and provide little in the way of consumer confidence.

I urge the USDA to consult with stakeholders and interested parties in order to find effective ways to communicate with consumers and ensure the continued livelihood of organic and conventional livestock producers. I believe the USDA can meet its goal without creating new burdens that will dampen this growing sector of the agriculture industry.

Given the seriousness of this issue, I request a response no later than August 12, 2016. Thank you for your attention to this matter, and I look forward to your response.

Sincerely,



Doug Collins  
Member of Congress