

**Vermont State Supplement, Water Quality Enhancement Activity – WQL19 -  
*Transition to Organic Grazing Systems*  
Vermont Supplemental Information in Blue Font**

**Enhancement Description**

Transition to Organic Grazing Systems supports the conversion of a conventional to an organic livestock grazing system. Key to the enhancement activity is following ecological and pasture-based grazing requirements, applying materials according to the National List of Allowed Synthetic and Prohibited Natural Substances, and managing livestock according to National Organic Program (NOP) rules (Subpart C – Organic Production and Handling Requirements) for organic certification. This enhancement activity facilitates compliance with NOP rules for organic certification.

**Landuse Applicability**

Pasture, Range, and Forest

**Benefits**

Environmental benefits will be operation specific. Benefits may include, but are not limited to improved forage, soil, and animal health, and improved water quality.

Managing for recommended time and timing of grazing, minimum and maximum grazing heights, pasture/paddock rotation, and rest periods improve plant health, diversity, and productivity. Sufficient pasture/paddock rest or pasture/paddock avoidance that minimizes livestock contact with viable internal parasite populations can break parasite cycles, reduce ingestion of parasites and the need for treatment, and improve animal health. Soil organisms and soil quality are benefitted by the reduction or elimination of natural or synthetic pesticides typically used on forage and/or livestock. Rotating livestock through several pastures/paddocks minimizes the development of loafing areas and improves the distribution of manure nutrients for plant uptake. Nutrients are more uniformly available to forage crops and the potential for polluted runoff from high traffic areas is reduced.

**Criteria for Transition to Organic Grazing Systems**

- Manage pasture grazing and rest periods to follow NRCS Prescribed Grazing practice standard (528) criteria for recommended maximum (begin) and minimum (end) grazing heights by forage species or Ecological Site Description interpretations. Begin and end grazing heights are followed to maximize forage quality and palatability and promote rapid recovery and forage regrowth.
  - o Maintain a livestock watering system that accommodates a high frequency of livestock rotation through several different pastures or paddocks during the grazing season. Follow NRCS practice standard criteria for Prescribed Grazing (528), Watering Facility (614), Pipeline

(516), or other related standards for appropriate supply and travel distance to water.

o Use fencing that is permanent, semi-permanent, and/or temporary to facilitate pasture rotation. Follow the NRCS Fence practice standard (382). Additionally, follow NOP rules for allowable fence materials.

- Apply all materials, including plant nutrients and pesticides for forage production and animal health, in accordance with the National List of Allowed Synthetic and Prohibited Natural Substances.
- Comply with all NOP rules for livestock management (NOP § 205.236 - .239 for livestock origin, feed, healthcare, living conditions) [These regulations are attached.](#)

Also see the National Organic Program Regulations website at:

<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?type=simple;c=ecfr;cc=ecfr;sid=4163ddc3518c1ffdc539675aed8efe33;region=DIV1;q1=national%20organic%20program;rgn=div5;view=text;idno=7;node=7%3A3.1.1.9.31#7:3.1.1.9.31.7.342.2>

- Complete organic transition within three (3) years as verified by obtaining an approved Organic System Plan from a valid certifying agency.

#### **Documentation Requirements for Transition to Organic Grazing Systems**

- Provide a written grazing plan following the 'Plans and Specifications' guidelines in the Prescribed Grazing standard. Include time and timing of grazing, minimum and maximum grazing heights, and date rotated in and date off of pastures/paddocks in the grazing plan, as appropriate for the landuse.
- Provide a record of the application of inputs according to the NOP rules, e.g., type, date, rate, and amount of allowed nutrients and pesticides for forage and livestock.
- Provide a copy of the Organic System Plan when approved by the certifying agent.

NRCS Pasture Notes, graziers notebooks, or other record keeping systems for pasture livestock operations can be used to facilitate record-keeping.

**§ 205.236 Origin of livestock.**

(a) Livestock products that are to be sold, labeled, or represented as organic must be from livestock under continuous organic management from the last third of gestation or hatching: *Except, That:*

(1) *Poultry.* Poultry or edible poultry products must be from poultry that has been under continuous organic management beginning no later than the second day of life;

(2) *Dairy animals.* Milk or milk products must be from animals that have been under continuous organic management beginning no later than 1 year prior to the production of the milk or milk products that are to be sold, labeled, or represented as organic, *Except,*

(i) That, crops and forage from land, included in the organic system plan of a dairy farm, that is in the third year of organic management may be consumed by the dairy animals of the farm during the 12-month period immediately prior to the sale of organic milk and milk products; and

(ii) That, when an entire, distinct herd is converted to organic production, the producer may, *provided* no milk produced under this subparagraph enters the stream of commerce labeled as organic after June 9, 2007: (a) For the first 9 months of the year, provide a minimum of 80-percent feed that is either organic or raised from land included in the organic system plan and managed in compliance with organic crop requirements; and (b) Provide feed in compliance with §205.237 for the final 3 months.

(iii) Once an entire, distinct herd has been converted to organic production, all dairy animals shall be under organic management from the last third of gestation.

(3) *Breeder stock.* Livestock used as breeder stock may be brought from a nonorganic operation onto an organic operation at any time: *Provided,* That, if such livestock are gestating and the offspring are to be raised as organic livestock, the breeder stock must be brought onto the facility no later than the last third of gestation.

(b) The following are prohibited:

(1) Livestock or edible livestock products that are removed from an organic operation and subsequently managed on a nonorganic operation may be not sold, labeled, or represented as organically produced.

(2) Breeder or dairy stock that has not been under continuous organic management since the last third of gestation may not be sold, labeled, or represented as organic slaughter stock.

(c) The producer of an organic livestock operation must maintain records sufficient to preserve the identity of all organically managed animals and edible and nonedible animal products produced on the operation.

[65 FR 80637, Dec. 21, 2000, as amended at 71 FR 32807, June 7, 2006]

**§ 205.237 Livestock feed.**

(a) The producer of an organic livestock operation must provide livestock with a total feed ration composed of agricultural products, including pasture and forage, that are organically produced and, if applicable, organically handled: *Except*, That, nonsynthetic substances and synthetic substances allowed under §205.603 may be used as feed additives and supplements.

(b) The producer of an organic operation 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 for the species at its specific stage of life;

(3) Feed plastic pellets for roughage;

(4) Feed formulas containing urea or manure;

(5) Feed mammalian or poultry slaughter by-products to mammals or poultry; or

(6) Use feed, feed additives, and feed supplements in violation of the Federal Food, Drug, and Cosmetic Act.

**§ 205.238 Livestock health care practice standard.**

(a) The producer must establish and maintain preventive 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 (ruminants);

(3) Establishment of appropriate housing, pasture conditions, and sanitation practices to minimize the occurrence and spread of diseases and parasites;

- (4) Provision of conditions which allow for exercise, freedom of movement, and reduction of stress appropriate to the species;
- (5) Performance of physical alterations as needed to promote the animal's welfare and in a manner that minimizes pain and stress; and
- (6) Administration of vaccines and other veterinary biologics.

(b) When preventive practices and veterinary biologics are inadequate to prevent sickness, a producer may administer synthetic medications: *Provided*, That, such medications are allowed under §205.603. Parasiticides allowed under §205.603 may be used on:

- (1) Breeder stock, when used prior to the last third of gestation but not during lactation for progeny that are to be sold, labeled, or represented as organically produced; and
- (2) Dairy stock, when used a minimum of 90 days prior to the production of milk or milk products that are to be sold, labeled, or represented as organic.

(c) The producer of an organic livestock operation must not:

- (1) Sell, label, or represent as organic any animal or edible product derived from any animal treated with antibiotics, any substance that contains a synthetic substance not allowed under §205.603, or any substance that contains a nonsynthetic substance prohibited in §205.604.
- (2) Administer any animal drug, other than vaccinations, in the absence of illness;
- (3) Administer hormones for growth promotion;
- (4) Administer synthetic parasiticides on a routine basis;
- (5) Administer synthetic parasiticides to slaughter stock;
- (6) Administer animal drugs in violation of the Federal Food, Drug, and Cosmetic Act; or
- (7) Withhold medical treatment from a sick animal in an effort to preserve its organic status. All appropriate medications must be used to restore an animal to health when methods acceptable to organic production fail. Livestock treated with a prohibited substance must be clearly identified and shall not be sold, labeled, or represented as organically produced.

**§ 205.239 Livestock living conditions.**

(a) The producer of an organic livestock operation must establish and maintain livestock living conditions which accommodate the health and natural behavior of animals, including:

(1) Access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight suitable to the species, its stage of production, the climate, and the environment;

(2) Access to pasture for ruminants;

(3) Appropriate clean, dry bedding. If the bedding is typically consumed by the animal species, it must comply with the feed requirements of §205.237;

(4) Shelter designed to allow for:

(i) Natural maintenance, comfort behaviors, and opportunity to exercise;

(ii) Temperature level, ventilation, and air circulation suitable to the species; and

(iii) Reduction of potential for livestock injury;

(b) The producer of an organic livestock operation may provide temporary confinement for an animal because of:

(1) Inclement weather;

(2) The animal's stage of production;

(3) Conditions under which the health, safety, or well being of the animal could be jeopardized; or

(4) Risk to soil or water quality.

(c) The producer of an organic livestock operation must manage manure in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, heavy metals, or pathogenic organisms and optimizes recycling of nutrients.