

# **NOFA-NY 100% Grass Fed Program**

## **Certification Manual**



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## Introduction

The NOFA-NY 100% Grass Fed certification program was developed in response to producer interest and market demand for a third party verification of grass fed production. 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 NOFA-NY Certified Organic, LLC.

These standards were developed by the NOFA-NY Grass Fed Certification Committee through examination of other existing grass fed certification programs, market research, and consultation with knowledgeable industry grass fed specialists. Grass fed producers were also consulted for input in the development of these standards.

NOFA-NY Certified Organic LLC, Pennsylvania Certified Organic (PCO) and Vermont Organic Farmers (VOF) have reached an equivalency agreement to honor and recognize our individual grass fed certifications as equivalent certifications that may be obtained as the required certification for a grass fed market.

## Definitions

**Boot stage** - Part of the flowering phase of plant growth, defined as the time when the seed head emerges from the sheath of the flag leaf.

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

**Enticement** – A feed or supplement, not a part of the overall animal ration, that is used in the handling and control of livestock.

**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.

**Pre-Tassel** – stage of life of corn plant prior to when the tassel forms, also known as the V10 stage.

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

**Vegetative State** – Stage of life of a plant prior to the development of fruiting structure: corn in a pre-tassel stage, soybeans prior to bloom and small and cereal grains pre-boot stage.

# **NOFA-NY 100% Grass Fed Certification Standards**

## **Section 1. Who Can Apply and Renewal Process**

- 1.1** Only NOFA NY, LLC certified organic farms can apply for grass fed certification through NOFA NY, LLC. Organic certification must be in good standing when applying for “NOFA-NY 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 dates.
- 1.3** An annual inspection is required and will be conducted together with the annual organic inspection. If an additional inspection is required, there will be an additional inspection fee.

## **Section 2. Origin of Livestock**

- 2.1** All requirements of Section 205.236 of the National Organic 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 sell milk as “NOFA-NY 100% Grass Fed”.

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

**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 NOFA-NY, an additional group of purchased certified organic dairy replacements may be transitioned to grass fed status provided that the animals will not start lactating before the completion of the 90 day transition period. Request for exception should include action(s) taken to procure certified grass fed replacement animals.
2. After 12/31/2019 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 NOFA-NY 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 shall provide a plan to show they are working toward correcting any mineral imbalances in their soil.

**C.** The producer shall provide a plan 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 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 growing 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 as noted in 3.2 D.

**C.** Any supplemental feed must be grass-based forages including hay, haylage, baleage, silage without grain, 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 grazed and/or harvested in the vegetative state (corn in a pre-tassel stage, soybeans prior to bloom; small and cereal grains pre- boot stage). *Refer to Intro & Definitions, page ii.*

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

**F.** Youngstock may be fed milk prior to weaning.

**G.** Pelleted forage may be used as an enticement.

#### **3.3 Prohibited Feedstuffs**

**A.** All grains and grain by-products (including but not limited to corn, soybean, and small grains), concentrates, meals, pelleted feed, and any other non-forage based feedstuff, except as described above in section 3.2. Also see section 4.3 below.

#### **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 NOFA-NY prior to use.

#### **Section 4. Livestock Health Care**

**4.1** All requirements of Section 205.238 of the National Organic 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 NOFA-NY immediately.

**B.** Identify the animal on the animal list as not being eligible to be marketed or to have products from the animal marketed as “NOFA-NY 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.

#### **Section 5. Livestock Living Conditions**

**5.1** All requirements of Section 205.239 of the National Organic 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 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 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 Regulations must be in compliance.

In addition:

- 8.2** Multi-ingredient products labeled as “NOFA-NY 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**

- 9.1** All requirements of Section 205.301 of the National Organic Standards must be in compliance.
- 9.2** The “NOFA-NY 100% Grass Fed” term or seal may only be used to represent products produced in compliance with and certified under the “NOFA-NY 100% Grass Fed” standards.
- 9.3** The “NOFA-NY 100% Grass Fed” logo may only be used by “NOFA-NY 100% Grass Fed” certified producers.
- 9.4** All labels and marketing materials containing the “NOFA-NY 100% Grass Fed” logo must be submitted to the certification office for approval prior to printing. If NOFA-NY has reason to

believe unauthorized use of the “NOFA-NY 100% Grass Fed” logo has occurred, NOFA-NY will conduct an investigation and if applicable, will pursue legal action.

## **Section 10. Compliance & Appeals**

- 10.1** This Certified Grass-Fed Standard sets additional requirements for certified organic ruminant livestock and handling operations. Therefore, the Grass Fed Organic System Plan serves as part of your organic system production and handling system plan including the need to be in compliance with NOP Regulation Sections 205.201 and 205.406.
- 10.2** Operations certified as “NOFA-NY 100% Grass Fed” shall abide by the terms set forth in these standards. If NOFA-NY 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.
- 10.3** If a producer is unable to comply with these standards or a noncompliance is not correctable, NOFA-NY 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.
- 10.4** If a producer is not able to correct the noncompliance in the given time frame stated in the proposed suspension or proposed revocation, or fails to submit a plan to correct the noncompliance, or fails to file an appeal, NOFA-NY may send the operation a written notice of suspension or revocation.
- 10.5** An operation has the right to appeal an adverse action decision made by NOFA-NY 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 “NOFA-NY 100% Grass Fed” standards.
- 10.6** The appeal letter will be reviewed by NOFA-NY 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 NOFA-NY in accordance with these standards are final.