



# CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy

## CCOF Livestock Unannounced Compliance Initiative (LUCI)

Implemented June 1, 2008

### Purpose

To increase CCOF oversight of various livestock operations to ensure ongoing compliance regarding:

- Access to pasture to for ruminants.
- Access to outdoors for poultry.
- Living conditions.
- Replacements.

This program will provide CCOF with additional monitoring data to verify the implementation of OSPs. This increases CCOF's existing due diligence while focusing our unannounced inspections in an area that is subject to differing interpretations, complicated compliance issues, and that may benefit from additional on the ground observations that may be useful should complaints or other issues arise. CCOF has consistently spent significant efforts on unannounced livestock and other inspections in the past several years. This program is meant to clarify the intent of those efforts and to ensure fair and consistent protocols are followed while looking into areas of considerable concern within CCOF's client base and the organic community generally.

These inspections are intended to view CCOF operations during appropriate periods and for significant periods of time for verifying compliance and are intended to include photographic evidence and detailed documentation of activities.

### Scope:

All CCOF livestock operations. Those with limited growing seasons or significant ongoing limitations on pasture/outdoor access will be prioritized initially. However, the initiative ultimately includes any and all CCOF livestock operations and over the 5 year life of the initiative is intended to ensure visits to all livestock operations with more than 10 ruminants or 100 birds.

CCOF's goal is to perform at least 3-6 unannounced visits/year to subject operations during their identified growing/pasturing/access season. In 2008 a minimum of 12 inspections are intended, with 20 occurring by July 15, 2009. This will begin with a series of 4 pilot inspections occurring by June 15, 2008. Each inspection will primarily include observation of activities and will last a minimum of 1-2 hours. Subsequent inspections will repeat these visits and include other CCOF dairies.

Additionally, to clarify compliance issues CCOF will consider developing a specific "pasturing client questionnaire" applicable to all operations of increased concern. This is defined as operations whose ruminant density exceeds CCOF's stated 3-5 animal/acre threshold. This questionnaire will help clarify on-the-ground practices and help ensure observations can be made at appropriate times and places. Later, this may be expanded to include a "outdoor access questionnaire" for operations exceeding a TBA "density of concern" in poultry production.



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## Procedures:

1. All inspections under this program will be assigned as unannounced inspections.
2. **"Livestock Compliance Initiative"** will be noted in Summary notes
3. Notify operation's RSR via email immediately regarding the creation of this inspection so they can be aware of and track UAs in their region.
4. Specific instructions below will be copied and pasted into the specific instructions field. These may be modified as needed for the specifics of the operation or inspection.

## Specific Instructions to Inspector

- Please observe operation as many times as possible for as long as possible in the available time. Generally a minimum of 45 minutes is necessary per observation and 1-2 hours is preferable. *This amount of time may be appropriate for viewing dairies with less than 200-300 animals. Larger dairies will require longer observation times, particularly to gather concrete evidence of non-compliances such full time confinement. Furthermore, if no animals are grazing it is critical that we conduct multiple visits over a couple days without identifying ourselves.*
- For operations in hot climates please make observations during prime grazing times such as early in the day or evening. *Refer to OSPL4.0 to see if there are specific exceptions or notes regarding milking hours and/or night time grazing practices.* Nighttime observations are relevant and appropriate. Please avoid observations that exclusively occur during the hottest period in the day unless these are associated with observations that occur at another cooler period. *Most operations will be letting the cows out to graze just prior to or after milking. The size of the herd, milking equipment, proximity of grazing fields, and number of employees will all impact the time it takes to move animals to and from their designated grazing fields. Keep this in mind when preparing for inspection and reviewing both L4.0 and L8.0 OSP and IRs from previous years.*
- It is helpful to make extra copies of the file maps for notes at inspection and even get a Google map that can overlay the field maps.
- Please take as many pictures as you can. Make sure to enter correct date and time into your camera before you begin taking photos. (If necessary, be sure to enable this feature in the camera menu!) This information should be accessible or displayed on the photos with your submitted report. Be sure to record each photo on a notepad and describe the location, direction, and field ID or any other helpful notes. (This will save you many hours later as you write your report and select photos for attachments.)
- If possible, work with CCOF to secure planting records from the most recent planting season so inspectors can verify type of crops in field and whether a field is dedicated to grazing or winter/summer forage production.
- **You are not required to but may identify yourself to the client.** Please note that it is preferable that this not occur during the first observation or early in the day if you intend to return. The intention is to view the operation when they are operating normally and during their identified grazing season. **Additionally, please note that CCOF has secured permission from all clients to observe their operation for monitoring as part of our certification program and the NOP.**
- *During the first phase of observation if no animals are grazing, it is critical that you do not identify yourself to the client if at all possible. Try to find a vantage point where you can view farm activities without being seen by ranch employees. Try to be unobtrusive. (CCOF has found that a radically different result can occur if the inspector lets the clients know they are present.)*

**For each observation period/event please note the following.** Note that some of these questions may be challenging to answer but please provide your best qualitative analysis based on your observations and



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expertise in the field generally. Please provide your best qualitative analysis based on your observations and expertise in the field generally. Please identify your answers by number within your report.

1. Specific locations and directions being viewed. –Note: *GPS may be useful for this but matching Google Earth and file maps typically provides more information. This is extremely relevant to the inspection because these large dairies often have a system for designating which Pen/string of cows habitually grazes in a specific field. It is critical to have these if we want to collect details such as whether dry cows are grazing or confined and the density of milk cow grazing. In the absence of pasture logs, we can determine density by noting ear tags and cross checking the numbers with the current herd list to see which pen it is (therefore how many animals were in that pen) and how many acres they were on.*
2. Time spent viewing. Time of day begun, time of day ended.
3. Approximate temperature and weather observations.
4. The following observations were made at this inspection:
  - a. Animals grazing? *Details should be provided such as whether these were milk cows, dry cows, or young stock. Were the milk cows just coming out of holding corrals at the milk parlor? What kind of specific behaviors are they expressing?*
  - b. If so, what percentage of herd and/or how many approximate animals?
  - c. Is there apparent evidence of current or past grazing including lack of grass at field edges, animal paths in pastures, cow pies in pasture or elsewhere. *Some notes from ATTRA: A cow typically has 10 defecations per day, with each manure pile covering an area of approximately 1 square foot. (They will also urinate between 8 to 12 times per day.) This could equate to a whole lot of manure covering the pasture, depending on animal density. Keep your eyes out for cow pies! Try to quantify... Look at forage availability and quality, check for animal paths and other high congregation areas such as around water troughs, salt blocks, and potential feeding areas, try to assess soil compaction, erosion, runoff and any other indications of over grazing. If grass is growing up fences, are they electric or barbed wire? Does the grass look like it could be mechanically clipped?*
  - d. Was housing or confinement observed? *If so, discuss cleanliness of confinement, density, activities of cows in confinement. Is there feed in bunk? Are they expressing natural bovine behaviors?(For example chewing cud, tail switching, and laying down.)*
  - e. Was shade provided? Is it necessary? Is there indication of misters or other temperature regulation? *Look over the feed bunks to see if there is any infrastructure for installing shade mesh or if metal roofing is present. Try to see whether there are pipes that would convey water through misters or drenchers in this area or elsewhere. Count trees or any other structures that could feasibly provide shade on a hot day in the pastures. CCOF has not yet determined to what extent shade is required on pastures, but it is absolutely essential to provide some form of temp regulation such as shade/misters that is accessible to all animals on hot days.*
  - f. If animals are confined or in a fenced area are gates open or shut to pasture?
5. What other observations were made of the operation? *Try to detail any other relevant details such as state of forage growth in pastures, describe any tractor work or field activities, irrigation activity, other on farm movement (e.g. pouring concrete, moving hay or other feed stockpiles, deliveries arriving, etc)*
6. Are there other livestock operations in the vicinity?
  - a. If so, during your time in the region did you observe them to be grazing similar land during the same period and/or temperature?