STRENGTHENING ORGANIC SYSTEMS, LLC

October 1, 2026

Ms. Michelle Arsenault
National Organic Standards Board USDA AMS-NOP
1400 Independence Ave, SW
Room 2648, Ag Stop 0268
Washington, DC 20250

**Docket: AMS-NOP-26-0892**

**RE: LS Discussion Document - Integrating Livestock and Agroforestry Crops**

Dear NOSB Livestock Subcommittee,

Strengthening Organic Systems (SOS) appreciates the NOSB Livestock Subcommittee's continued work to address the integration of livestock into organic cropping systems. We particularly support the Subcommittee's proposed approach of distinguishing managed livestock grazing from the direct application of raw manure and evaluating grazing through site-specific contamination risks and prevention measures.

SOS works closely with the Oregon Organic Winegrowers Network. Our comments draw on insights from our work with organic wine-grape growers, as well as our knowledge of FSMA and food safety requirements applicable to wine grapes. Sheep grazing in organic vineyards provides a particularly relevant example of why the distinction between managed grazing and direct raw manure application is needed.

Sheep can be intentionally integrated into vineyard management to control cover crops and vegetation, cycle nutrients, reduce mowing and tractor passes, reduce soil compaction and fuel use, and support a more biologically integrated organic production system. Yet the application of a 90-day preharvest interval following grazing can effectively eliminate sheep from vineyards during a significant portion of the growing season. As the Subcommittee recognizes, this can force producers to choose between an ecologically beneficial production practice and maintaining compliance with an interval developed for the application of uncomposted manure.

Wine grapes also provide an important example of the relevance of proposed Organic Control Point (d): **"Post-harvest processing of organic crops which reduces or eliminates risks from pathogenic organisms."**

Wine grapes grown specifically for winemaking have a fundamentally different pathway to consumption than grapes grown for the fresh market. Under the FSMA Produce Safety Rule,

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produce that receives commercial processing that adequately reduces the presence of microorganisms of public health significance is eligible for an exemption from most requirements of the rule when the conditions at 21 CFR § 112.2(b) are met. FDA specifically identifies processing produce into products such as wine as an example of commercial processing that can qualify for this exemption.

Separately, FDA has recognized the unique circumstances presented by wine grapes under the Produce Safety Rule. In 2019, after reviewing the production and use of wine grapes, FDA announced that it would exercise enforcement discretion for Produce Safety Rule requirements applicable to entities growing, harvesting, packing, and holding wine grapes.

While FDA's regulatory framework is separate from the organic requirements at issue here, it provides an important precedent for recognizing intended use and subsequent processing when evaluating food-safety controls. **NOP could similarly recognize the significance of this post-harvest processing when evaluating contamination risk associated with managed grazing in organic vineyards.**

For an organic vineyard producing grapes specifically for winemaking, managed sheep grazing should not automatically be treated as equivalent to a direct application of raw manure. Instead, the certifier should be able to evaluate the actual contamination pathway and the controls associated with the production system, including the intended use of the crop and subsequent processing.

Based on our work with organic wine-grape growers, relevant control points for vineyard grazing may include the intended destination of the grapes for winemaking; grazing density and management; physical separation between sheep and the fruiting zone; timing of grazing relative to harvest; monitoring for conditions that could result in direct contamination of fruit; procedures for addressing fruit where direct contamination is observed; and documentation that grapes are destined for fermentation and wine processing.

**We therefore strongly support inclusion of Control Point (d) in NOP 5025 and recommend that NOP guidance explicitly recognize post-harvest processing as a relevant control point when evaluating whether a site-specific preharvest interval is necessary following managed livestock grazing.**

For wine grapes destined exclusively for winemaking, the combination of the crop's intended use, subsequent fermentation and processing, and appropriate vineyard contamination-prevention practices provides a strong basis for allowing certifiers to approve managed sheep grazing without automatically imposing the 90-day interval applicable to uncomposted manure application.

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In closing, organic practices should never come at the expense of food safety. Organic producers and handlers have a fundamental responsibility to produce safe food, and any approach to integrated grazing must maintain strong protections against pathogen contamination. **At the same time, those protections should be science- and risk-based**, reflecting the production practice, crop, and intended use. We believe this approach can protect food safety while removing unnecessary barriers to integrated livestock systems that advance the ecological principles of organic agriculture.

We appreciate the Board's continued work on this issue and the opportunity to contribute to its development.

Sincerely,

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