



1400 Independence Avenue, S.W.
Room 2642-S, STOP 0268
Washington, D.C. 20250-0268

VIA EMAIL

December 20, 2019

Randy Rivera
Administrator for Agriculture Protection and Certification
Agriculture and Consumer Protection
Texas Department of Agriculture
1700 North Congress Avenue
Austin, TX 78701
Randy.Rivera@TexasAgriculture.gov

Re: NOPC-00006677-19 Natural Prairie Dairy Farm, LLC

CERTIFIER CASE CLOSURE NOTICE

Dear Mr. Rivera:

We are writing to notify you the U.S. Department of Agriculture (USDA), Agricultural Marketing Service, National Organic Program (NOP) has concluded its investigation of complaints filed against your client, Natural Prairie Dairy Farm, LLC (NPDF). Based on a video published by the Animal Recovery Mission (ARM), the complaints alleged that NPDF's livestock production and handling practices violated several provisions of the USDA organic regulations at 7 CFR 205.

Our investigation did not substantiate the complaints against NPDF. The evidence reviewed during this investigation did not show evidence that NPDF failed to comply with the USDA organic regulations for livestock living conditions, livestock healthcare, or pasture practice standards. Our investigation included evidence from:

- Multiple unannounced Federal audits in 2018 and 2019;
- An unannounced inspection by the Texas Department of Agriculture in 2019;
- Private third-party inspections by National Milk Producers Federation (NMPF); and
- A private third-party inspection by Validus.

Observations from seven audits and inspections over a two-year period found that the operation was clean and well-maintained, cattle were healthy, and animals had access to pasture during the grazing season with good-quality forage. Federal auditors found that NDPF met the requirements for dry matter intake and access to pasture. In addition, a private audit verified

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specific corrective actions executed by NPDF to address the concerns raised by the ARM video. Subsequent audits confirmed the continued implementation of these corrective actions.

The case against NPDF is hereby closed. If we receive new evidence documenting apparent violations of the USDA organic regulations, then we may reopen the investigation. If you have further questions, please contact Emily Prisco at (720) 471-3009 or Emily.Prisco@usda.gov.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink that reads "Betsy Rakola". The signature is written in a cursive, flowing style.

Betsy Rakola
Director, Compliance & Enforcement Division
National Organic Program

cc: Director, Accreditation Division