



April 27, 2016

***SUBMITTED ELECTRONICALLY***

Administrator Elanor Starmer  
U.S. Department of Agriculture, Agricultural Marketing Service  
1400 Independence Avenue SW  
Washington, DC 20250-3700

**Re: Request for Extension of Comment Period - Docket No. AMS–NOP–15–0012; NOP–15–06PR  
National Organic Program; Organic Livestock and Poultry Practices**

Dear Administrator Starmer:

The National Chicken Council (NCC), the National Turkey Federation (NTF), the North American Meat Institute (NAMI), the US Poultry and Egg Association and the United Egg Producers (UEP) respectfully request that the Agricultural Marketing Service (AMS or the Agency) extend the comment period regarding the above-referenced changes to the National Organic Program - Organic Livestock and Poultry Practices, published in the *Federal Register* on Wednesday April 13, 2016.

Collectively, our members will be directly subject to the new policy set forth by AMS, and all will be significantly affected. For that reason, the industry requests additional time to develop comments comprehensively addressing the changes announced in the Proposed Rule. We request an extension of an additional 90 days, with the new comment period ending on September 13, 2016.

The Proposed Rule announced a number of substantial changes and requirements—including changes regarding space and property requirements for our animals. These proposed alterations to current requirements would considerably impact how the poultry industry does business and, in order for the poultry industry to formulate meaningful comments, we will have to consider how these announced changes would affect numerous aspects of our members' complex operations. The poultry industry is actively analyzing the Proposed Rule and collecting the information necessary to provide accurate insight, but additional time will be necessary for the industry to provide carefully considered responses that will assist the Agency's decision-making process.

If you need any further information, please do not hesitate to contact any of us. Thank you for your consideration of our request.

Sincerely,

Ashley B. Peterson  
Vice President, Scientific and Regulatory Affairs  
National Chicken Council

Lisa Wallenda Picard  
Vice President, Scientific and Regulatory Affairs  
National Turkey Federation

Mark Dopp  
Senior Vice President, Regulatory & Scientific Affairs, and General Counsel  
North American Meat Institute

John Glisson  
Vice President of Research Programs  
U.S. Poultry & Egg Association

Oscar S. Garrison  
Vice President, Food Safety Regulatory Affairs  
United Egg Producers