

National Organic Standards Board (NOSB)
Livestock Subcommittee (LS)
Integrating Livestock and Agroforestry Crops Discussion Document
Fall 2026

Summary of Issue:

The Livestock Subcommittee (LS) is currently exploring opportunities to promote and assist growers utilizing or interested in agroforestry (integrating grazing livestock into crop production systems). The Subcommittee aims to provide guidance to organic certifiers for assessing these operations, enabling producers to leverage this ecologically beneficial, integrative approach. Concurrently, this initiative seeks to maintain robust pathogen prevention measures that conform to both the Food Safety Modernization Act (FSMA) and organic regulatory standards.

Background:

In the winter of 2025, the Livestock Subcommittee (LS) requested a work agenda item to develop a proposal to revise and clarify requirements for the integration of livestock and agroforestry crops. The LS presented a [Discussion Document](#) for the Fall 2025 public meeting and accepted public comments. The full NOSB had a verbal presentation and discussion at the Spring 2026 meeting (Omaha, NE, May 2026). The LS is presenting an additional discussion document for the Fall 2026 and solicit feedback from stakeholders regarding this practice.

Integration of livestock and agroforestry crops is an increasingly popular practice in the US with potential to improve soil health (<https://www.fs.usda.gov/nac/practices/silvopasture.php>). Systems that include grazing in orchards, tree crops, and other cropping systems have been common for centuries in many parts of the world. They allow for management and utilization of orchard floor vegetation, increasing food production per unit of land. Integration of livestock and crops is a core principle of regenerative agriculture. Increasing biodiversity and cycling nutrients has exponential benefits to the health and productivity of an ecosystem. Agroforestry crops can include woody perennials that provide shade or forage for livestock, and also fruit or nut species for human consumption. There are financial as well ecological benefits for producers. Agroforestry systems are inherently aligned with organic principles and should be encouraged and supported by the NOP; however harvest rules after livestock have grazed in integrated systems are limiting the ability for producers to either be certified, or do this practice at all.

A conflict arises with organic certification due to the Federal Regulation at [7 CFR 205.203](#), which requires 90- or 120-days between application of animal manures and harvest of organic crops for human consumption. It appears as though Congress' intent of pre-harvest restrictions is to protect human health, as the Organic Foods Production Act (OFPA) describes in 7. U.S.C. 6513(b)(2)(B)(iv) that organic plans can provide for the application of raw manure on crops for human consumption if a preharvest interval is applied "to ensure the safety of such crop." The Food and Drug Administration (FDA), in its 2015 final [Produce Safety Rule](#), describes conditions when the presence of grazing animals may contribute to contamination of produce and may require producers to take steps to

minimize these risks, but FDA does not prohibit grazing animals on produce farms, nor does it apply any minimum preharvest interval in such cases. The NOSB is interested in exploring ways to work with producers, certifiers, and consumers to support these important ecological systems while also creating clarity on rules for certification that work for all stakeholders.

Current Regulations:

The relevant sections of the organic regulations applicable to grazing livestock in organic cropping systems are included at 7 CFR 205.203 (c) which stipulates that organic producers “*must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances.*” This section also lays out the requirements for preharvest intervals of either 90 or 120 days when producers apply uncomposted manure to their organic production sites. Due to a lack of clear guidance related to grazing livestock, certifiers have tended to require a 90 or 120 day preharvest interval following any livestock grazing. This poses a barrier to operations integrating livestock into their cropping systems, as most operations’ growing seasons do not allow for both a timely grazing of forage and a lengthy preharvest interval prior to the harvest of the organic crop. These producers tend to forgo organic certification, choose not to integrate livestock at all, or must manage grazing in a way that is not ideal for the livestock or the forage.

The passage of the Food Safety Modernization Act, and the subsequent promulgation of the [Produce Safety Rule](#) at FDA, required the federal government to scientifically evaluate various risks to food safety as it relates to farm practices and produce commonly consumed raw. In the 2015 Produce Safety Final Rule ([80 FR 74354](#)), FDA acknowledges that “currently available science does not allow us to identify a specific minimum time period between grazing and harvesting that is generally applicable across various commodities and farming practices.” Instead, FDA suggests producers consider implementing a preharvest interval based on site specific conditions if there is reason to believe the grazing activities may cause contamination of produce. FDA also acknowledges that post-harvest processing can adequately reduce pathogen risks posed during the growing of produce, so when produce is typically cooked or further processed (e.g., fermented, heat treated, etc.) after harvest, these types of commodities are exempt from the Produce Safety Rule.

Also in the 2015 Produce Safety Rule, FDA recognizes that grazing livestock pose a significantly lower risk of contaminating crops with pathogenic organisms than does the application of raw manure, and their science-based food safety rules reflect that difference in risk. Organic regulations do not specifically provide for a more nuanced approach to this issue when grazing livestock is considered the same as when a farmer applies raw manure despite the fact that these two activities pose very different risks to contaminating organic crops with pathogenic organisms. In this discussion document, the Livestock Subcommittee explores ways that organic certifiers could have the latitude to evaluate the two activities differently, as they pose different potential risks to contamination of organic crops. The LS is not proposing any revisions to the mandatory preharvest interval of 90 or 120 days following an uncomposted manure application. The LS is proposing an approach that views livestock grazing not as a

direct manure application, but, rather, as a practice that has a potential for contamination of organic crops with pathogenic organisms requiring site specific prevention strategies.

Proposed Guidance Revision:

The NOP Handbook includes [NOP 5025](#) which describes how certifiers should evaluate and approve contamination and commingling prevention plans for organic producers and handlers. This guidance document references two parts of the organic regulations: 7 CFR 205.201 (Organic production and handling system plan) and 7 CFR 205.272 (Commingling and contact with prohibited substance prevention practice standard). The first regulation applies to all certified operations, which are required to develop an organic system plan that prevents contamination and commingling regardless of its scope (crop producer, livestock producer, or handler). The second generally applies to organic handling operations, who must ensure their handling prevents commingling with nonorganic products or contamination with prohibited substances. The guidance document describes control points to address these concerns that would apply to certified crop and livestock producers as well as certified handlers. As such, we can assume the NOP's intention is that contamination and commingling prevention plans be developed by all certified operators including producers who raise both crops and livestock on the same certified sites. The guidance's inclusion of crop producers also suggests that it covers the requirements at 7 CFR 205.203 which require producers to prevent contamination from prohibited substances and pathogenic organisms.

The Livestock Subcommittee's proposed approach to addressing the barriers identified above is to add a new section to this guidance that provides a list of organic control points producers and certifiers could use to evaluate contamination risk by pathogenic organisms and adequacy of prevention strategies when livestock graze in organic crop fields.

New Sections:

4.1 General

Certifying agents can consider livestock grazing distinct from direct raw manure applications (requiring a 90 or 120 day preharvest interval) when a producer's plan adequately identifies the risks grazing may pose to contaminating organic crops with pathogenic organisms and implements risk prevention and avoidance measures.

4.2 Organic Control Points

3. Examples of organic control points for crop operations that graze livestock on land which also produces crops for human consumption can include, but are not limited to:

- a. Potential for livestock presence to contaminate organic crops with pathogenic organisms
- b. Physical separations between livestock and organic crops
- c. Implementation of site specific preharvest intervals

- d. Post-harvest processing of organic crops which reduces or eliminates risks from pathogenic organisms

The Livestock Subcommittee agrees with the scientific community and FDA that grazing livestock pose less risk to organic crops than does the application of raw manure. The LS also believes that the current organic regulations provide certifiers flexibility in whether the 90/120 preharvest interval should be applied following the grazing of livestock. Additional specificity in this guidance document would support certifiers in their evaluation of contamination risks on operations that integrate livestock into their cropping systems and provide a pathway for these types of operations to overcome unnecessary barriers to certification.

Questions to stakeholders:

Producers: please provide specific examples of livestock grazing in organic cropping systems and steps producers take to prevent contamination of crops with pathogenic organisms. Examples can include grazing density, types of animals, types of crops, benefits to livestock, benefits to crops, alignment with food safety regulations, contamination prevention steps.

Certifiers: please provide specific challenges you see in evaluating site specific contamination risks and prevention strategies as it relates to grazing livestock in organic cropping systems.

Please provide the LS with additional control points that should be considered for inclusion in a proposal to revise guidance document NOP 5025.

Subcommittee Vote

Motion to accept the discussion document on Integrating livestock and agroforestry crops

Motioned by: Nate Lewis

Seconded by: Cat McCluskey

Yes: 4 No: 0 Abstain: 0 Recuse: 0 Absent: 1