



November 16, 2023

To: Lori Tortora, Director, Compliance & Enforcement Department, National Organic Program, U.S. Department of Agriculture
From: Colin Henstock, Investigations Project Manager, PETA

Via e-mail: Lori.Tortora@usda.gov

Re: Apparent Violations of National Organic Program Regulations at Lone Star Organic Dairy

Dear Ms. Tortora:

Your attention is urgently requested. PETA has received a complaint regarding apparent violations of the National Organic Program regulations at Lone Star Organic Dairy LLC (NOP ID 6220009056), which allegedly milks 2,300 cows and is located at 9078 FM 47, Wills Point, TX 75169. Please see [these photos and videos](#), which we were told were captured recently on the farm. We were also told the following:

- Cows were left with access to a 14-foot-deep pit of feces and urine—and fell into it. (Please see [this video](#).)
- Many if not most calves born at the facility die without adequate care, including from scours and pneumonia. The bodies in the farm’s “cemetery” area have doubled in the past six months, and carcasses sometimes lie exposed for days. (Please see [this photo](#).)
- Cows were injured and crippled by nails left inside bedding materials. Other bedding and living areas became saturated with feces and urine, and water troughs went uncleaned and became filthy. (Please see [this photo](#).)
- Cows’ collars are not routinely loosened as the animals grow. Some collars have become embedded in the animals’ necks, causing wounds and abscesses.
- Cows trying to eat roughage had to reach their heads and necks through barbed-wire fencing and were cut. Some cows escaped because of inadequate fencing and were struck and killed by cars.
- Blind calves were put into a pen made of electrified fencing and were repeatedly shocked. Blind heifers “wandered around the property until they died.”

As you know, [Title 7 CFR, Part 205](#) directs organic farmers to provide animals with appropriate conditions in order to minimize the spread of disease, to reduce their stress and potential for injury, to provide clean and dry bedding, and to keep living areas in good condition, including by frequent removal of waste.

We respectfully ask that your agency conduct an *unannounced* inspection of this dairy and take all appropriate enforcement action, up to and including revoking the facility’s organic certificate.

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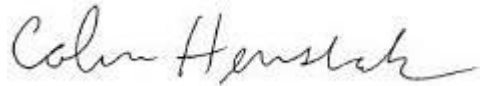
Entities:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

We are told that Rise Run Capital LLC, which acquired the farm last year, has drastically reduced staffing levels, which has either caused and/or exacerbated some of these welfare issues.

Please feel free to contact me with any questions. I can be reached at ColinH@peta.org. Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Colin Henstock". The signature is written in black ink and is positioned above the typed name.

Colin Henstock
Investigations Project Manager