



October 8, 2015

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

Docket: AMS-NOP-15-0037

RE: Livestock Subcommittee – 2017 Sunset Review

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board on its 2017 Sunset Review process and the subcommittee votes posted for the fall 2015 meeting.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect the growth of organic trade to benefit the environment, farmers, the public and the economy.

OTA thanks NOSB for carefully considering each livestock production input scheduled to sunset in 2017. It's critical that NOSB hear from certified farmers on whether these inputs are consistent with and necessary for organic production, or whether there are other effective natural or organic alternatives available.

To help facilitate a robust comment and review process, OTA created an electronic survey for each input under review for 2017. The surveys are user-friendly, available to **every NOP certificate holder**, and include 7-10 questions addressing the necessity of the National List input under review. The names of the companies submitting the information are confidential (not disclosed to OTA). The goal is to collect information for NOSB to consider at the first stage of the two-step process to shape its recommendation, and again prior to the vote at the second meeting.

To ensure wide distribution of the surveys beyond OTA membership, OTA worked with Accredited Certifying Agencies (ACAs) to distribute the survey links to all of their certified clients as well as to targeted clients they know are using the inputs under review. We also worked through our Farmers Advisory Council (FAC¹) to help assist us with distribution to NOP certified farmers. We hope these efforts will help NOSB in its review process.

¹ OTA's Farmers Advisory Council was established in 2013 to formalize two-way communication between OTA and member producers as well as regional organic producer organizations across the United States. Through dialog

The comments submitted at this time include everything we have received through October 07, 2015. We have received the following total responses:

- 205.603 Synthetic substances **allowed** in use in organic livestock production: 70 responses
- 205.604 Nonsynthetic substances **prohibited** for use in organic livestock production: 0 responses

New survey comments have been provided on the following National List materials:

- Mineral oil
- Trace minerals and vitamins
- Iodine
- Copper sulfate
- Oxytocin
- Magnesium sulfate
- Hydrogen peroxide
- Chlorine materials
- Aspirin
- Alcohols – Ethanol and Isopropanol
- Peracetic acid
- Electrolytes
- Lidocaine
- Glucose
- Biologics (vaccines)

National List Criteria

Materials that have been placed onto the National List for use in organic livestock production should remain on the National List if: 1) they are consistent with organic farming; 2) they are still necessary to the production of the agricultural product because of the unavailability of wholly natural substitute products in organic production; and 3) no new information has been submitted demonstrating adverse impacts on humans or the environment (OFPA SEC. 2118 [7 U.S.C. 6517] National List). Furthermore decisions must be transparent, non-arbitrary, and based on the best current information and in the interest of the organic sector and public at-large. We bring forward a number of substances on the National List that farmers indicated were still necessary that the LS either voted to remove or were split on their vote to remove.

Parasiticides (see our separately filed comments on this topic for more detail)

Outreach to OTA membership indicates consensus that retaining only a single parasiticide on the National List (Fenbendazole), as the LS has voted, is not in the best interest of farmers or their livestock. Parasiticides have varying efficacy and availability in different situations and in different parts of the country. Producers do not have full confidence in the ability of Fenbendazole to adequately treat

and input, FAC gives organic farmers a voice to directly influence OTA's policy and provides an avenue for OTA to share information and advocacy work with this stakeholder group.

lungworm, which has the potential to kill livestock, and wish to see Moxidectin retained for this purpose. It is also important to fully appreciate the context within which these substances are used—**for emergency treatment only**. This means that the parasite affliction must be life-threatening to justify its use. In these situations, it is critical that farmers have readily available treatments that are known to be effective to ensure the welfare of their animals. Overly restricting the organic livestock producer’s toolbox in these situations will force farmers into making a decision between trying an unproven treatment method or losing the organic status of their animal. OTA understands the momentum behind removing ivermectin from the National List due to its potential for environmental harm to soil life. However, since any synthetic parasiticides are rarely, if ever, used on organic farms the actual direct harm to soil life from use on these farms is minimal, and we encourage NOSB to consider the use pattern of these substances in their decision to remove or relist.

- Ivermectin* – OTA supports LS recommendation to remove
- Moxidectin* – OTA **does not** support LS recommendation to remove
- Fenbendazole* – OTA supports LS recommendation to re-list

Mineral Oil

Mineral oil is used as a component of topical fly repellants and for lubrication during AI breeding. This material is the industry standard for both of these uses, and wholly non-synthetic alternatives do not seem to be readily available or utilized. Controlling flies and performing AI breeding are routine activities on organic dairy operations, and mineral oil remains necessary for both these functions. OTA supports the continued allowance of mineral oil for topical use and as a lubricant.

Procaine and Lidocaine

Both procaine and lidocaine are used as local anesthetics for minor surgery performed on organic animals. These substances are used to minimize pain and should be retained on the National List from an animal welfare perspective.

Nonsynthetic substances prohibited for use in organic livestock production (7 CFR 205.604)

OTA created a survey for the sole prohibited nonsynthetic substance, strychnine, however, we did not receive any responses. This is not surprising, as organic farmers, who have no experience with this input, would not be compelled to provide feedback on their necessity in organic production. The lack of response to these surveys suggests that strychnine should continue to be prohibited, and OTA supports the LS’ recommendations to renew this materials’ prohibition on 7 CFR 205.604.

Below is a summary of the feedback received via OTA’s Sunset surveys to date. Please note that our surveys focus on the necessity of the essentiality of a National List input. We are not aware of or reporting on any new information regarding adverse impacts on humans and on the environment.

Synthetic Substances Allowed for Use in Organic Livestock Production (§ 205.603)

Substance	Survey Information
Alcohols: Ethanol & Isopropanol	Specific comments describing the use of this substance on organic farms: We use isopropyl alcohol to disinfect teat end prior to taking a milk sample for culturing and prior to using Phytomast to treat mastitis. We also use it to wipe the top of vaccine and other biologics and bottled vitamins and health aids prior to

	<p>putting a needle in the bottle to extract a product into a syringe. Used to disinfect teat ends for taking milk samples, needles/syringes used for vaccines or oral treatments aka garlic. Mostly for disinfecting vaccine bottle tops. We store our IV in a container filled with Isopropyl alcohol. If we are out of iodine ,we use it to dip calves navels.</p> <p>Specific comments regarding the availability and efficacy of alternatives: What alternatives? None that I would use</p>
Aspirin	<p>Specific comments describing the use of this substance on organic farms: We use aspirin to occasionally treat a cow with an inflammatory condition, such as a joint injury. We use Aspirin to reduce inflammation and pain. We need something to help our animals be comfortable as their bodies work to heal. Aspirin is used to aid in treatment for fever or discomfort from an injury. As a pain and fever reducer. Some producers use it for treatment of mastitis. We have not tried this but are considering it. Helps with pain relief which keeps cows eating during times of injury We give this routinely to cows with mastitis. The swelling that often accompanies mastitis blocks the milk flow from the udder, allowing the infection to grow. Aspirin is very effective at reducing swelling ,allowing the udder to clear itself of bacteria laden milk thus aiding the cow to heal herself. Aspirin also increases the comfort level of the cow suffering from mastitis, which is very painful. If she is experiencing less pain, she is more likely to fully let down her milk, which will aid recovery for the same reasons. There is an animal welfare issue here. I don't like to see my cows in pain. I would hate to think of organic dairy as being more painful for the cows than conventional. I like aspirin a lot because it treats the symptoms (pain, swelling) and allows the cow to more effectively cure herself. Taking away aspirin would remove the best tool in our anti-mastitis toolbox. I think it's possible that the SSC's of the organic industry as a whole might rise as a result. Also something like this might push me to consider retiring from farming. It is necessary to give pain relief, or relief of swelling to our cows. It would be inhumane not to. Aspirin is occasionally used to give relief to livestock in emergency situations. It is effective and simple to administer and provides humane relief to livestock</p> <p>Specific comments regarding the availability and efficacy of alternatives: Not sure what else would easily take its place. Flunixin is currently allowed but we very seldom use it and would need to get it from a vet. I believe its administration route is intravenous which we would prefer not to have to do vs. giving aspirin orally. Also, Flunixin requires a holdout period whereas aspirin doesn't. Perhaps we could give white willow bark but don't know its efficacy or dosage. There are some alternatives but seem to be harder to source. None that I am aware of that are currently listed. Aspirin is widely available and relatively safe and easy to dose. One advantage is</p>

	<p>that can be administered orally (does not need to be injected). We find that our animals generally respond well to it.</p> <p>There are other pain relief items out there, but aspirin is more effective</p> <p>The only thing I can think of is banamine. I've got to think aspirin is a better alternative.</p>
<p>Biologics—Vaccines</p>	<p>Specific comments describing the use of this substance on organic farms:</p> <p>We use specific vaccinations for health conditions that have occurred with our livestock. We currently are routinely using 5 types of biologics--an <i>e-coli</i> vaccination on the milking herd to reduce the incidence and severity of case of <i>e-coli</i> mastitis, a clostridium vaccination on the young stock after we had some cases of blackleg appear suddenly out of seemingly nowhere that quickly killed several young stock several years ago, a different <i>e-coli</i> vaccination given to dry cows to increase the immunity their colostrum will carry to the calves to reduce the incidence and severity of <i>e-coli</i> scours, a biologic given to newborn calves to give immunity against <i>e-coli</i> and other bacteria, and a general use biologic given to cows or young stock hit by an active case of something in order to help stimulate their immune system.</p> <p>With antibiotics forbidden, vaccines are the only way to prevent diseases. No one should sell sick critters.</p> <p>We use vaccines for all stages of animal productions (baby calves, yearlings and brood cows. Our area is very wet and the animals need protection from leptospirosis, blackleg and other Clostridial diseases. We also need protection for Tetanus and IBR, BVD and BRVD. The use of these vaccines makes it so we do NOT need to use antibiotics for treatment; prevention is always best!</p> <p>Vaccines are critical to the promoting wellness and preventing illness. In the absence of a comprehensive vaccination protocol, outbreaks of black leg (<i>clostridium perfringens</i>) and also scours (<i>E. coli</i>, rotovirus and coronavirus) leading to substantial death loss of young and yearling calves.</p> <p>We vaccinate for a number of diseases. Since we are limited in the treatment allowed for organic production, the best thing is to not get a disease that needs to be treated. More cows would have to be diverted from organic production without vaccines.</p> <p>Prevention of disease control of existing disease</p> <p>Specific comments regarding the availability and efficacy of alternatives:</p> <p>These are readily available vaccines and very efficacious. Without the <i>e-coli</i> mastitis vaccine, cows will often die when hit with <i>e-coli</i> mastitis as it is often very acute and toxic to the cow. Before using the <i>e-coli</i> biologics for calf scours, we lost some calves to acute scours. By routine use of these products, the incidence of occurrence and severity of both <i>e-coli</i> mastitis and <i>e-coli</i> scours in newborn calves are both greatly reduced.</p> <p>I know of no alternative to vaccines.</p> <p>I don't know of any alternatives that are effective for the diseases I listed above.</p> <p>Vaccines are widely available without a prescription and we have found them to be a cost-effective way to keep cattle healthy.</p> <p>Unknown</p>

Chlorhexidine	<p>Specific comments describing the use of this substance on organic farms: We have used a chlorhexidine teat dip in the past when the iodine teat dip we were using didn't seem effective in the winter to prevent the occasional occurrence of herpes mammilitis on a few heifer teats during very cold weather.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Our veterinarian said that chlorhexidine teat dip was the best solution available for herpes mammilitis.</p>
Chlorine Materials	<p>Specific comments describing the use of this substance on organic farms: Chlorine products are required by the Federal Government via the Pasteurized Milk Ordinance (PMO) that governs the cleaning of milk house equipment on dairy farms shipping milk. To sanitize and sterilize both calf feeding and milking equipment (bottles, nipples, buckets, milking pipeline, receiver jar, bulk tank, etc.) Chlorine materials are critical to the basic sanitation of dairy equipment and to the basic health of humans and livestock</p> <p>Specific comments regarding the availability and efficacy of alternatives: The PMO does not allow alternatives for some uses. I do not know of other effective sanitizers that are available, allowed, and would be acceptable to the State and Federal dairy inspection programs.</p>
Electrolytes—without antibiotics	<p>Specific comments describing the use of this substance on organic farms: We use electrolytes to treat milk fever that occurs occasionally in recently parturient cows. We also use electrolytes to treat dehydration in scouring calves. We use them to treat calves that get diarrhea, or may not be getting enough milk from the mother and are looking a bit droopy. Improving dehydration in animals sick for any reason It is necessary if a cow becomes dehydrated It is used for shipping stress and heat stress and in general for hydration of poultry. When chicks are sent by mail they risk exposure to either heat or cold - electrolytes are recommended by hatcheries upon arrival to help get the chicks settled and eating. During times of severe heat in pasture the electrolytes help keep hens in production and hydrated.</p> <p>Specific comments regarding the availability and efficacy of alternatives: No known alternatives to calcium electrolyte intravenous therapy for cows that are literally down (they are so low in blood calcium that their muscles are failing to work so they can no longer rise and it will start to shut down body functions) with milk fever. Most farm stores carry non-medicated electrolytes; usually quite effective. I don't know of anything other than prayer</p>
Flunixin	<p>Specific comments describing the use of this substance on organic farms: On rare occasions, prescribed by a vet for an acute situation with one of our cows.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Most potent anti-inflammatory available for organic livestock. Don't know of any</p>

	other available as powerful.
Furosemide	No responses received
Glucose	<p>Specific comments describing the use of this substance on organic farms: Used in treating ketosis, which doesn't happen very often. But without treatment, the cow will continue to go downhill and become more ketotic. Bad cases of ketosis or hypoglycemia</p> <p>Specific comments regarding the availability and efficacy of alternatives: Dextrose is the sugar normally used in treatment of dairy cattle for ketosis but that isn't specifically on the National List. I don't know of anything else</p>
Glycerin	<p>Specific comments describing the use of this substance on organic farms: It is an ingredient in a teat dip that is used at each of two daily milkings on each milking cow. It provides an emollient to the teat dip to keep cow's teats from chapping and getting irritated. This is especially important in the winter.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Don't know of any alternative.</p>
Hydrogen Peroxide	<p>Specific comments describing the use of this substance on organic farms: We use hydrogen peroxide as a sanitizer in the twice daily washing of the individual wash cloths used to prep the cows for milking. Also used for sanitizing of calf pails and bottles, etc. Wound cleansing Hydrogen Peroxide is readily available and is effective in cleaning and treating wounds and hoof conditions. We have used it as a preventative and as treatment for hoof problems in dairy cattle.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Chlorine dioxide may be an effective alternative. I recently read an article in a farm magazine that reported that chlorine dioxide is the most effective disinfectant for use with calf feeding equipment, but we haven't tried it yet. Nothing else works well for cleaning a wound and bubbling out the debris.</p>
Magnesium Hydroxide	<p>Specific comments describing the use of this substance on organic farms: Will use for the extremely occasional cow with bowel function problems.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Not sure as it is an issue. We don't often have to use it so haven't researched the alternatives.</p>
Magnesium Sulfate	<p>Specific comments describing the use of this substance on organic farms: We use Epsom salts to occasionally soak sore or infected feet on cows. Magnesium is used as a mineral supplement to prevent "grass staggers" and milk fever. Magnesium is required for the production of hormones that aid in the absorption of calcium from the gut and mobilization of calcium from bones. Magnesium sulfate is absorbed well by dairy cattle. Epsom Salts can reduce/treat inflammation in livestock.</p>

	<p>Specific comments regarding the availability and efficacy of alternatives: Although regular salt could be used as a foot soak, not sure that it would be quite as effective as magnesium sulfate.</p>
Oxytocin	<p>Specific comments describing the use of this substance on organic farms: We have never found it needed since we have been producing organic milk these last 17 years To help fresh cows give their milk down so they have complete milk-out to prevent illness. Used on a selective basis but vital when we need it. We support the continued listing of Oxytocin as a substance to be used in post parturition therapeutic applications in livestock.</p> <p>Specific comments regarding the availability and efficacy of alternatives: To help drop placenta: giving the cow warm water, milking her, giving oral calcium for letdown of milk: gentle treatment and stroking of the udder. There are few, if any, alternatives that are as effective.</p>
Peroxyacetic/Peracetic Acid	<p>Specific comments describing the use of this substance on organic farms: It is the sanitizer that we use twice a day in our milking system wash regime and every other day for our bulk tank washing. Sanitizing</p> <p>Specific comments regarding the availability and efficacy of alternatives: It has a longer kill time than chlorine as well as the acetic acid in it functions as a mineral remover to keep milkstone from building up no equipment. I don't know of any alternatives to this. We used bleach before we found pero/pera acid but it was not as effective.</p>
Poloxalene	<p>Specific comments describing the use of this substance on organic farms: We have never had a case of pasture bloat but I would also like to have Poloxalene on the list in case we started having problems with it.</p> <p>Specific comments regarding the availability and efficacy of alternatives: No responses received</p>
Xylazine	<p>Specific comments describing the use of this substance on organic farms: It is used by the vet when an animal needs to be sedated for a procedure, such as a displaced abomasum roll and tack, removal of a horn, or treating a broken bone.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Not sure, that is the vet's expertise. Xylazine is their preference over lidocaine so must be it is more effective for the particular need.</p>
Copper Sulfate	<p>Specific comments describing the use of this substance on organic farms: It is not used as foot bath ingredient. Copper is toxic to sheep and permanently stains wool. Foot issues We urge the continued listing of copper sulphate based on its effectiveness in controlling and preventing hoof-related diseases and conditions. We have used it to treat hoof diseases.</p>

	<p>Specific comments regarding the availability and efficacy of alternatives: There are none. Zinc Sulfate works very well for sheep. Zinc sulfate is currently in a petition process.</p> <p>If Zinc Sulfate becomes allowed as hoof treatment in organic livestock production, will you continue to use Copper Sulfate to treat organic animals? No. Zinc Sulfate should be allowed if only for sheep only. Not sure because I don't know how its effectiveness compares.</p>
Iodine	<p>Specific comments describing the use of this substance on organic farms: For the sanitation of using any treatments on cattle that need attention. We use iodine teat dips at every milking on every lactating cow to clean and sanitize the cows prior to milking and to provide residual anti-bacterial effect post milking. We use iodine teat dip daily both as a pre-dip to cleanse and prepare the cows for milking and a post-dip to provide residual bactericidal action post milking. It helps us achieve and maintain a low bacteria and somatic cell count in our milk shipped as well as reduces the likelihood of mastitis. It is used in our dairy operation as a teat dip to prevent mastitis. We routinely use iodine to disinfect the navels of newborn calves; sometimes it is used as a wound dressing. It is used in teat dip daily and all newborn calves have navels dipped in it. It is used to disinfect wounds as needed. Teat dip, wound disinfectant Iodine is of critical importance to the organic farming as a preventative measure to ensure that cattle stay healthy. We use it in teat dips in our pre- and post milking procedures. It aids in the prevention of mastitis and other infections that greatly impact the dairy industry. We occasionally use it as a topical treatment for hoof conditions.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Not sure that others are as effective against as wide a spectrum of bacteria or have as long a residual effect. Iodine is the best all round teat dip currently available in organic production. I am not aware of anything listed organic that is economical and effective in the uses listed above. In teat dips there is no viable alternative. We have tried using several different dips in winter and the only one we have found to prevent damage from cold is iodine based. We also use a barrier dip that contains iodine in wet weather. In normal conditions we use a 3rd type of dip which also has iodine in it. Dry teat dip works in the winter, but I feel the iodine is healthier for the cows in the warmer weather</p>
Lidocaine	<p>Specific comments describing the use of this substance on organic farms: For the rare surgical procedure by the vet. Dehorning, for surgical procedure</p> <p>Specific comments regarding the availability and efficacy of alternatives:</p>

	<p>I don't know of anything that would work to keep a cow comfortable during a surgery like DA. As far as dehorning we try to get the vet here as soon as we can (1-3 wks)</p>
Mineral Oil	<p>Specific comments describing the use of this substance on organic farms: Used for lubrication for AI breeding. We have never used mineral oil at the current farm that I am at as the herd manager, but I have used mineral in the past on cattle and find that it is an effective method to control flies when used as delivery method for paraciticides. We support the use of mineral oil as a delivery method to apply organic certified fly controls. Water as a delivery is economically not viable as its nature to evaporate almost instantly. Mineral oil is used in conjunction with Crystal Creek fly product as a pour on. The mineral oil keeps the treatment working longer.</p> <p>Specific comments regarding the availability and efficacy of alternatives: None. Some fly treatments have coconut oil but there are some folks with sensitivity to that substance. One farmer reported that this year no more than one cup of mineral oil was used per cow</p>
Trace Minerals & Vitamins	<p>Specific comments describing the use of this substance on organic farms: Free choice. Very important as the cattle need their vitamins so to speak. Health of pregnant cows, calves and bulls. Part of the mineral package our cows eat daily. Trace minerals are vital to our dairy animals for health and well being. We use organic (Redmond brand) trace minerals with selenium; Our area is a selenium deficient and it is necessary as an additive to maintain animal health and a good breeding program. Given daily in feed They are added to our grain and in our salt blocks Added to feed rations Trace Minerals should continue to be listed, as they are vital to the overall health of livestock and help prevent disease, while aiding in the maintenance of growth, reproduction, and overall health.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Nothing can take the place of needed vitamins and trace minerals needed in the diet for healthy, productive livestock. There are no alternatives We do not have very many choices for organic trace minerals with selenium; Availability is sporadic (trying to buy ahead when possible) There is a Redmond salt block with selenium that we can not use because of the binder in the block...such a minute item makes our choices even more limited.</p>
Excipients, for use in the manufacture of livestock drugs	<p>Specific comments describing the use of this substance on organic farms: They likely in fluid vitamins, biologics, or other liquid health care products that we occasionally use.</p>

In closing, we thank the Board for its time and commitment. OTA is committed to collecting information from our broad membership and beyond in order to assist NOSB in determining whether or not a substance on the National List remains necessary in organic livestock production.

Again, on behalf of our members across the supply chain and the country, OTA thanks NOSB for the opportunity to comment and for your commitment to furthering organic agriculture.

Respectfully submitted,



Nathaniel Lewis
Senior Crops and Livestock Specialist
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association