

2027 Livestock Sunset Materials Summaries (2025 Review, Fall Updates)

Butorphanol | §205.603 (CAS #-42408-82-2)—federal law restricts this drug to use by or on the lawful written or oral order of a licensed veterinarian, in full compliance with the AMDUCA and 21 CFR part 530 of the Food and Drug Administration regulations. Also, for use under 7 CFR part 205, the NOP requires:

- (i) Use by or on the lawful written order of a licensed veterinarian; and
- (ii) A meat withdrawal period of at least 42 days after administering to livestock intended for slaughter; and a milk discard period of at least 8 days after administering to dairy animals.

- **Uses in organic livestock production:** Used as an anesthetic for surgical procedures.
- **OTA Position:** Butorphanol currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic livestock production.
- **Subcommittee justification and vote:** The Subcommittee finds butorphanol compliant with the Organic Foods Production Act (OFPA) and/or 7 CFR 205.600 and is not proposing removal. **Unanimous vote to renew**
- **Subcommittee questions:**
 1. In what circumstances is Butorphanol commonly used on organic livestock operations?
 2. Is the pain relief material toolbox for managing pain in surgical applications sufficient?

Flunixin | §205.603 (CAS #-38677-85-9)—in accordance with approved labeling; except that for use under 7 CFR part 205, the NOP requires a withdrawal period of at least two-times that required by the FDA

- **Uses in organic livestock production:** Used to treat inflammation and pyrexia.
- **OTA Position:** Flunixin currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic livestock production.
- **Subcommittee justification and vote:** The Subcommittee finds flunixin compliant with the Organic Foods Production Act (OFPA) and/or 7 CFR 205.600 and is not proposing removal. **Unanimous vote to renew**
- **Subcommittee questions:** None

Magnesium hydroxide | §205.603 (CAS #-1309-42-8)—federal law restricts this drug to use by or on the lawful written or oral order of a licensed veterinarian, in full compliance with the AMDUCA and 21 CFR part 530 of the Food and Drug Administration regulations. Also, for use under 7 CFR part 205, the NOP requires use by or on the lawful written order of a licensed veterinarian.

- **Uses in organic livestock production:** Used as an antacid and laxative.
- **OTA Position:** Magnesium hydroxide currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic livestock production.
- **Subcommittee justification and vote:** The Subcommittee finds magnesium hydroxide compliant with the Organic Foods Production Act (OFPA) and/or 7 CFR 205.600 and is not proposing removal. **Unanimous vote to renew**
- **Subcommittee questions:** None

Oxytocin | §205.603 use in post parturition therapeutic applications

- **Uses in organic livestock production:** In nonorganic production, it can be used regularly to help nonorganic dairy cows relax and “let down their milk.” In organic production, it is used “in post parturition therapeutic applications,” an annotation that some find ambiguous.
- **OTA Position:** Given the Board’s recommendation to remove this listing in its last review, based in part on two members with a large presence in the organic dairy sector, OTA is interested in hearing from members regarding the necessity of this substance and its consistency with organic production.
- **Subcommittee justification and vote:** The Subcommittee finds oxytocin compliant with the Organic Foods Production Act (OFPA) and/or 7 CFR 205.600 and is not proposing removal. **Unanimous vote to renew**
- **Subcommittee questions:** None

Poloxalene | §205.603 (CAS #-9003-11-6)—for use under 7 CFR part 205, the NOP requires that poloxalene only be used for the emergency treatment of bloat.

- **Uses in organic livestock production:** Used as an emergency bloat treatment.
- **OTA Position:** Poloxalene currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic livestock production.
- **Subcommittee justification and vote:** The Subcommittee finds poloxalene compliant with the Organic Foods Production Act (OFPA) and/or 7 CFR 205.600 and is not proposing removal. **Unanimous vote to renew**
- **Subcommittee questions:**
 1. Are there any non-synthetic, approved, and effective bloat remedies for ruminants that are commercially available to ranchers?

Formic acid | §205.603 (CAS # 64-18-6)—for use as a pesticide solely within honeybee hives.

- **Uses in organic livestock production:** Used to control varroa mites in honeybees.
- **OTA Position:** Formic acid currently meets the criteria for continued listing: it does not appear to be harmful to human health or the environment, is necessary for organic production, there are no viable alternatives, and is consistent with organic livestock production.
- **Subcommittee justification and vote:** The Subcommittee finds formic acid compliant with the Organic Foods Production Act (OFPA) and/or 7 CFR 205.600 and is not proposing removal. **Unanimous vote to renew**
- **Subcommittee questions:**
 1. Are the options for controlling Varroa mites in beehives sufficient or redundant?
 2. Are there natural ways to combat mites that could reduce the dependency on parasiticides?

Sucrose octanoate esters | §205.603 (CAS #s-42922-74-7; 58064-47-4)—in accordance with approved labeling

- **Uses in organic livestock production:** Used to control varroa mites in honeybees.
- **OTA Position:** Given the Board's recommendation to remove this listing in its last review, OTA is interested in hearing from members if there is a need for this substance, and whether the EPA-registered products containing this substance are in use by organic producers.
- **Subcommittee justification and vote:** The Subcommittee finds sucrose octanoate esters (SOEs) compliant with the Organic Foods Production Act (OFPA) and/or 7 CFR 205.600 and is not proposing removal. **Unanimous vote to renew**
- **Subcommittee questions:**
 1. Is there current information on the use of SOE formulations by farmers? Is there a large demand for SOE formulations by livestock producers?

EPA List 4 Inerts | §205.603 As synthetic inert ingredients as classified by the Environmental Protection Agency (EPA), for use with nonsynthetic substances or synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances. (1) EPA List 4—Inerts of Minimal Concern.

- **Uses in organic livestock production:** Used as inactive ingredients formulated with allowed pesticide active ingredients.
- **OTA Position:** OTA has commented extensively on this listing, which references a list no longer maintained by EPA. OTA recognizes the need to determine a solution that allows inert ingredients in pest control products that are vital to organic operations, meet OFPA criteria, and allow for the development of new products to meet the needs of organic operations. OTA generally supports the recommended rulemaking options voted on at the October 2024 NOSB meeting and looks forward to further work on this from the NOP. Until there is an alternative to this listing, OTA supports the continued listing to ensure organic operations have the tools essential to their success.

- **Subcommittee justification and vote:** The Subcommittee finds EPA List 4 Inerts compliant with the Organic Foods Production Act (OFPA) and/or 7 CFR 205.600 and is not proposing removal. **Unanimous vote to renew**
- **Subcommittee questions:** None

Excipients | §205.603 only for use in the manufacture of drugs and biologics used to treat organic livestock when the excipient is:

- (1) Identified by the FDA as Generally Recognized As Safe;
- (2) Approved by the FDA as a food additive;
- (3) Included in the FDA review and approval of a New Animal Drug Application or New Drug Application; or
- (4) Approved by APHIS for use in veterinary biologics.

- **Uses in organic livestock production:** Used as inactive ingredients formulated with allowed active medical treatment ingredients.
- **OTA Position:** Excipients currently meet the criteria for continued listing: they do not appear to be harmful to human health or the environment, they are necessary for organic production, there are no viable alternatives, and they are consistent with organic livestock production.
- **Subcommittee justification and vote:** The Subcommittee finds excipients compliant with the Organic Foods Production Act (OFPA) and/or 7 CFR 205.600 and is not proposing removal. **Unanimous vote to renew**
- **Subcommittee questions:** None

Strychnine | §205.604

- **Uses in organic livestock production:** Prohibited for use in organic production. Strychnine is a toxic alkaloid allowed in conventional agriculture for below-ground use to control pocket gophers.
- **OTA Position:** OTA supports the continued prohibition of strychnine in organic production.
- **Subcommittee justification and vote:** The Subcommittee finds the prohibition of strychnine at §205.604 compliant with the Organic Foods Production Act (OFPA) and/or 7 CFR 205.600 and is not proposing removal. **Unanimous vote to renew**
- **Subcommittee questions:** None