



October 21, 2016

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-16-0049

RE: Livestock Subcommittee – Proposal to remove Ivermectin from the National List

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Livestock Subcommittee's (LS) proposal to remove Ivermectin from the National List.

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 organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

Summary of OTA's Position

OTA *supports* the removal of Ivermectin from the National List. We agree that Ivermectin is no longer necessary in organic production, as alternative materials are effective to control parasites in dairy cattle in emergency situations. However, for these alternative materials to become available, NOP rulemaking should occur on NOSB's parasiticide recommendation from the Spring 2016 meeting prior to removing Ivermectin.

We offer the following more detailed comments:

The LS cites a number of evaluation criteria outlined in the Organic Foods Production Act to justify its proposal to remove Ivermectin. OTA members indicate that the alternative substances, Fenbendazole and Moxidectin, are effective in controlling parasites in emergency situations, and Ivermectin is no longer necessary in organic production.

NOSB's parasiticide recommendation at the Spring 2016 meeting recommended amending annotations for Fenbendazole and Moxidectin, with the removal of arbitrary use restrictions and the inclusion of appropriate and consistent withholding times. These changes will allow producers to respond to emergency parasite situations in their livestock appropriately. Because the availability of Fenbendazole and Moxidectin hinge on finalization of this recommendation, we believe that the removal of Ivermectin should only occur once the formal rulemaking process to implement NOSB's recommendation on parasiticides is complete. Should Ivermectin be removed prior to the change to annotations for



Fenbendazole and Moxidectin, producers may not be able to respond quickly enough to emergency parasite situations with effective treatments. NOSB may want to consider including a mechanism in its recommendation that ensures producers do not lose access to Ivermectin before the restrictions on Fenbendazole and Moxidectin are amended through rulemaking.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nathaniel Lewis", is written over a light gray circular watermark that contains the text "Nathaniel Lewis".

Nathaniel Lewis
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association