



October 11, 2017

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2642-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-17-0024

RE: Livestock Subcommittee – Clarifying “Emergency” for Use of Synthetic Parasiticides in Organic Livestock Production

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Livestock Subcommittee’s Proposal on Clarifying “Emergency” for Use of Synthetic Parasiticides in Organic Livestock Production.

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 over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. 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

The Organic Trade Association supports the work of the Livestock Subcommittee (LS) to clarify “emergency” when producers justify the use of synthetic parasiticides on their organic dairy stock. This issue must be clarified in conjunction with the recently passed NOSB proposal reducing the withholding times for fenbendazole and moxidectin and recommendation to remove ivermectin. Certifiers should be applying this restriction consistently to ensure a level playing field for all organic dairy producers. OTA commends LS for approaching this issue through the lens of a step-wise preventive approach which is the guiding principle of pest and disease management in organic crops, livestock and handling. However, OTA also believes that the specific parameters proposed by LS to justify the “emergency” use of a parasiticide are better suited to be included in a guidance document issued by the National Organic Program (NOP) rather than in the regulations themselves. Additionally, as we mentioned in our comments to LS for the Spring 2017 meeting, we would support further work on clarifying the defined term “routine use of parasiticide” in NOP issued guidance.

Better Suited for Guidance

The current organic regulations already have requirements for an organic dairy producer’s preventive health management plan to address parasites including selection of species and types of livestock for resistance to parasites and establishment of housing, pasture conditions, and sanitation practices that minimize occurrence of parasites. OTA believes that the additional language to 7 CFR 205.238(c) proposed by LS is redundant to the current regulations and may be too prescriptive to be included in the

regulations themselves. OTA encourages LS to propose that these specific parameters be developed into NOP guidance rather than rulemaking.

Clarifying “Routine Use”

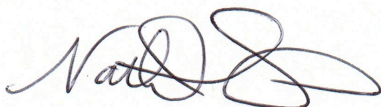
In our comments to LS for the Spring 2017 NOSB meeting, we requested that LS not focus on clarifying or defining the term “emergency,” but rather focus on clarifying the current definition for “routine use of parasiticide.” We appreciate LS’s decision, in this more recent proposal not to propose a definition for “emergency,” but we still see value in developing guidance on how and when Accredited Certifying Agents (ACAs) can consistently identify the “routine use of parasiticide” so that corrective actions can be taken. This clarification should be incorporated into a larger guidance document on appropriate use of synthetic parasiticides in dairy animals.

Conclusion

The Organic Trade Association supports the ongoing work of LS to clarify “emergency” use of parasiticides, particularly in the wake of previous NOSB proposals to reduce milk-withholding times and to remove ivermectin from the National List. However, OTA suggests that the specific descriptions of preventive practices outlined by LS in its proposal be included in a proposal for development of guidance that also addresses how ACAs can identify “routine use of parasiticide” on an organic livestock operation. Guidance that addresses both how producers can justify the “emergency” use of parasiticides as well as how ACAs can consistently identify “routine use of parasiticide” will ensure a level playing field for organic dairy producers and ensure that reductions in milk withholding times proposed by NOSB will not result in a misuse of these materials.

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

Respectfully submitted,



Nathaniel Lewis
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association