



April 7, 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-15-0002

RE: Livestock Subcommittee – Petitioned Materials: Acidified Sodium Chlorite and Zinc Sulfate

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board and the Livestock Subcommittee (CS) on its proposals regarding petitions to add Acidified Sodium Chlorite (ASC), as a teat dip, and Zinc Sulfate, as a hoof bath, to National List of synthetic substances allowed for use 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 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 its exhaustive review of these substances against the criteria for inclusion on the National List: 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 with 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).

We note that the LS are divided in its recommendations to add these two substances to the National List. These materials would be used as alternatives to currently allowed synthetic substances used for the same purposes:

- Iodine (teat dip)
- Chlorhexidine (teat dip only when iodine has lost effectiveness)
- Copper Sulfate (hoof bath)
- Hydrogen peroxide (hoof bath)

The proposals indicate that the LS believes ASC to satisfy all National List evaluation criteria, but the LS does not indicate whether their analysis of the TR and public comment on Zinc Sulfate has allowed them to determine whether it satisfies or fails National List criteria.

Outreach to OTA livestock producer membership indicate a widespread interest in having alternatives available to them provided these substances meet the requirements for inclusion on the National List. Having the ability to switch between treatment options increases the efficacy of these treatments and helps prevent disease resistance to any single treatment method.

Both ASC and Zinc Sulfate are synthetic alternative treatments for which there is no wholly natural alternative (i.e. both of these substances would be used as alternatives for currently allowed synthetics), so the addition of these substances would not necessarily result in the increased use of synthetic substances in organic livestock production. Additionally, the concerns raised by the LS on the potential for Zinc Sulfate used as foot baths to have collateral harmful effects on the operation's soil organisms would be addressed under the organic practice standards which require producers to manage their operations in a manner that prevents contamination of crops, soil, and water.

OTA believes that organic livestock producers should have access to alternative health care treatments, provided these treatments meet National List criteria. Should NOSB determine, through information contained in the TR and through public comment, that ASC and Zinc Sulfate are as equally compatible with organic livestock production as previous boards have determined their alternatives (iodine, chlorhexidine, copper sulfate, and hydrogen peroxide) to be, we feel that these substances *should* be added to the National List. Providing access to equal alternative healthcare treatments will allow additional flexibility for livestock operations to manage the health of their animals and help to support the continued success of the organic livestock sector.

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