



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 – 2019 Sunset Review: Oxytocin and Procaine

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Livestock Subcommittee's Proposal to remove two substances, Oxytocin and Procaine, as part of its 2019 Materials Sunset Review.

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.

Oxytocin

The Organic Trade Association ultimately supports the Livestock Subcommittee's (LS's) proposal to remove Oxytocin from the National List. We recognize that there are multiple natural alternatives available to address many of the post-parturition complications that can arise in organic dairy cattle. We also recognize that the allowance of Oxytocin prevents some organic producers from claiming that their products are "hormone free" despite the fact that Oxytocin is not a growth hormone.

Removing a livestock medication used for specific and potentially life-threatening medical issues will always require careful consideration. Should NOSB vote to remove Oxytocin, it will result in some producers needing to treat animals for serious conditions and having to ship those treated animals to a conventional operation. Simultaneously, removing Oxytocin will push producers to explore and embrace natural alternatives that have proven to be effective for most of the medical conditions typically treated by Oxytocin. This is a delicate balancing act. However, the Organic Trade Association believes that sufficient advances in natural alternatives have occurred to justify removal of Oxytocin from the National List. We support LS's proposal to remove.

Procaine

Procaine functions as a pain reliever when performing surgery or physical alterations on livestock. Lidocaine also is allowed for this purpose and is generally more widely utilized by veterinarians. Additionally, current formulations of Procaine often include antibiotics, which means these formulations are prohibited in organic livestock production. It is unclear how much antibiotic-free Procaine is used, if

ever, by veterinarians on organic livestock operations. In addition, it appears that producers and veterinarians are indifferent to removing this substance from the National List since they are all accustomed to using Lidocaine. However, we do recognize that organic livestock producers have a limited toolbox, and it is critical that they have access to tools that help to reduce pain and suffering in the animals they raise. Procaine is one of these tools, yet it does appear that producers and veterinarians are not using it, and it is nearly impossible to find formulations that are compliant with organic regulations. Therefore, unless new information is submitted to NOSB in this public comment period that highlights specific conditions that necessitate the use of Procaine, the Organic Trade Association does not take exception to LS's proposal to remove Procaine from the National List.

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