



March 30, 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-16-0100

RE: Livestock Subcommittee – Clarifying “emergency” for use of synthetic parasiticides in organic livestock production (Discussion Document)

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Livestock Subcommittee’s discussion document: 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.

OTA agrees that additional clarity is needed around the appropriate use of synthetic parasiticides in organic livestock production. With NOSB’s vote to remove ivermectin and modify withholding times for organic animals that are treated, additional scrutiny may be placed on judicious use of these important livestock production tools. When considering this issue, it is important for producers to have flexibility in what constitutes an “emergency” to accommodate animal welfare concerns. Similarly, there must be clarity around the definition of “routine use” of parasiticides, a practice that is prohibited under the current standards.

Since an “emergency” will likely manifest itself differently on each individual organic dairy operation, attempting to define this term in a way that can be recognized and documented by operators, inspectors, and certifiers may pose an insurmountable challenge. Instead, the Livestock Subcommittee could consider developing a recommendation to USDA that would inform guidance around what types of practices constitute “routine use of parasiticides.” By further clarifying what “the regular, planned, or periodic use of parasiticides” looks like on the ground at an organic livestock operation, inspectors will not have to judge whether a farmer had actually treated an “emergency” through documents and records.

OTA encourages the Livestock Subcommittee to approach this issue by developing guidance recommendations to further clarify the current prohibition on the routine use of synthetic parasiticides rather than defining a new term, “emergency.”

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,



Nathaniel Lewis
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association