



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 – 2017 Sunset Summaries for 206.603 and 205.604

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board on its 2017 Sunset Review process and the summaries posted for the spring 2015 meeting.

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 carefully considering each livestock production input scheduled to sunset in 2017. It's critical that NOSB hear from certified farmers on whether these inputs are consistent with and necessary for organic production, or whether there are other effective natural or organic alternatives available.

To help facilitate a robust comment and review process, OTA created an electronic survey for each input under review for 2016 and 2017. The surveys are user-friendly, available to **every NOP certificate holder**, and include 7-10 questions addressing the necessity of the National List input under review. The name of the companies submitting the information is confidential (not disclosed to OTA). The goal is to collect information for NOSB to consider at the first stage of the two-step process to shape their recommendation, and again prior to the vote at the second meeting.

To ensure wide distribution of the surveys beyond OTA membership, OTA worked with Accredited Certifying Agencies (ACAs) to distribute the survey links to all of their certified clients as well as to targeted clients they know are using the inputs under review. We also worked through our Farmers Advisory Council (FAC¹) to help assist us with distribution to NOP certified farmers. We hope these efforts will help NOSB in its review process.

¹ OTA's Farmers Advisory Council was established in 2013 to formalize two-way communication between OTA and member producers as well as regional organic producer organizations across the United States. Through dialog

Given the short comment period, OTA left the surveys open beyond the comment deadline and we are still in the process of collecting information from certified farmers. We intend to deliver additional information in person at the meeting in La Jolla, CA.

National List Criteria

Materials that have been placed onto the National List for use in organic livestock production should remain on the National List if: 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 in 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). Furthermore decisions must be transparent, non-arbitrary, and based on the best current information and in the interest of the organic sector and public at-large.

Below is a summary of the feedback received via OTA’s sunset surveys to date. Please note that our surveys focus on the necessity of the essentiality of a National List input. We are not aware of or reporting on any new information regarding adverse impacts on humans and on the environment.

Synthetic Substances Allowed for Use in Organic Livestock Production (§ 205.603)

Substance	Survey Information
Alcohols: Ethanol & Isopropanol	<p>Specific comments describing the use of this substance on organic farms: We use isopropol alcohol to disinfect teat end prior to taking a milk sample for culturing and prior to using Phytomast to treat mastitis. We also use it to wipe the top of vaccine and other biologics and bottled vitamins and health aids prior to putting a needle in the bottle to extract a product into a syringe.</p> <p>Specific comments regarding the availability and efficacy of alternatives: No responses received</p>
Aspirin	<p>Specific comments describing the use of this substance on organic farms: We use aspirin to occasionally treat a cow with an inflammatory condition, such as a joint injury. We use Aspirin to reduce inflammation and pain. We need something to help our animals be comfortable as their bodies work to heal. Aspirin is used to aid in treatment for fever or discomfort from an injury. As a pain and fever reducer. Some producers use it for treatment of mastitis. We have not tried this but are considering it. Helps with pain relief which keeps cows eating during times of injury</p> <p>Specific comments regarding the availability and efficacy of alternatives: Not sure what else would easily take it's place. Flunixin is currently allowed but we very seldom use it and would need to get it from a vet and I believe it's administration route is intravenous which we would prefer not to have to do via</p>

and input, FAC gives organic farmers a voice to directly influence OTA’s policy and provides an avenue for OTA to share information and advocacy work with this stakeholder group.

	<p>giving aspirin orally, as well as flunixin requires a holdout period whereas aspirin doesn't. Perhaps we could give white willow bark but don't know it efficacy or dosage.</p> <p>There are some alternatives but seem to be harder to source.</p> <p>None that I am aware of that are currently listed.</p> <p>Aspirin is widely available and relatively safe and easy to dose. One advantage is that can be administered orally (does not need to be injected). We find that our animals generally respond well to it.</p> <p>There are other pain relief items out there, but aspirin is more effective</p>
Atropine	No responses received
Biologics—Vaccines	<p>Specific comments describing the use of this substance on organic farms:</p> <p>We use specific vaccinations for health conditions that have occurred with our livestock. We currently are routinely using 5 types of biologics--an e-coli vaccination on the milking herd to reduce the incidence and severity of case of e-coli mastitis, a clostridium vaccination on the youngstock after we had some cases of blackleg appear suddenly out of seemingly nowhere that quickly killed several youngstock several years ago, a different e-coli vaccination given to dry cows to increase the immunity their colostrum will carry to the calves to reduce the incidence and severity of e-coli scours, a biologic given to newborn calves to give immunity against e-coli and other bacteria, and a general use biologic given to cows or youngstock that are being hit by an active case of something in order to help stimulate their immune system.</p> <p>With antibiotics forbidden, vaccines are the only to prevent diseases. No one should sell sick critters.</p> <p>We use vaccines for all stages of animal productions (baby calves, yearlings and brood cows. Our area is very wet and the animals need protection from leptospirosis, blackleg and other Clostridial diseases. We also need protection for Tetanus and IBR, BVD and BRVD. The use of these vaccines make it so we do NOT need to use antibiotics for treatment; prevention is always best!</p> <p>Vaccines are critical to the promoting wellness and preventing illness. In the absence of a comprehensive vaccination protocol outbreaks of black leg (clostridium perfringens) and also scours (E. coli, rotavirus and coronavirus) leading to substantial death loss of young and yearling calves.</p> <p>Specific comments regarding the availability and efficacy of alternatives:</p> <p>These are readily available vaccines and very efficacious. Without the e-coli mastitis vaccine, cows will often die when hit with e-coli mastitis as it is often very acute and toxic to the cow. Before using the e-coli biologics for calf scours, we lost some calves to acute scours. By routine use of these products, the incidence of occurrence and severity of both e-coli mastitis and e-coli scours in newborn calves are both greatly reduced.</p> <p>I know of no alternative to vaccines.</p> <p>I don't know of any alternatives that are effective for the diseases I listed above.</p> <p>Vaccines are widely available without a prescription and we have found them to be a cost effective way to keep cattle healthy.</p>

Butorphanol	No responses received
Chlorhexidine	<p>Specific comments describing the use of this substance on organic farms: We have used a chlorhexidine teat dip in the past when the iodine teat dip we were using didn't seem effective in the winter to prevent the occasional occurrence of herpes mammilitis on a few heifer teats during very cold weather.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Our veterinarian said that chlorhexidine teat dip was the best solution available for herpes mammilitis.</p>
Chlorine Materials	<p>Specific comments describing the use of this substance on organic farms: Chlorine products are required by the Federal Government via the Pasturized Milk Ordinance (PMO) that govern the cleaning of milkhous equipment on dairy farms shipping milk. To sanitize and sterilize both calf feeding and milking equipment (bottles, nipples, buckets, milking pipeline, receiver jar, bulk tank, etc.)</p> <p>Specific comments regarding the availability and efficacy of alternatives: The PMO does not allow alternatives for some uses. I do not know of other effective sanitizers that are available, allowed, and would be acceptable to the State and Federal dairy inspection programs.</p>
Electrolytes—without antibiotics	<p>Specific comments describing the use of this substance on organic farms: We use electrolytes to treat milk fever that occurs occasionally in recently parturient cows. We also use electrolytes to treat dehydration in scouring calves. We use them to treat calves that get diarrhea, or may not be getting enough milk from the mother and are looking a bit droopy.</p> <p>Specific comments regarding the availability and efficacy of alternatives: No known alternatives to calcium electrolyte intravenous therapy for cows that are literally down (they are so low in blood calcium that their muscles are failing to work so they can no longer rise and it will start to shut down body functions) with milk fever. Most farm stores carry non medicated electrolytes; usually quite effective.</p>
Flunixin	<p>Specific comments describing the use of this substance on organic farms: On rare occasions, prescribed by a vet for an acute situation with one of our cows.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Most potent anti-inflammatory available for organic livestock. Don't know of any other available as powerful.</p>
Furosemide	No responses received
Glucose	<p>Specific comments describing the use of this substance on organic farms: Used in treating ketosis, which doesn't happen very often. But without treatment, the cow will continue to go downhill and become more ketotic.</p> <p>Specific comments regarding the availability and efficacy of alternatives:</p>

	Dextrose is the sugar normally used in treatment of dairy cattle for ketosis but that isn't specifically on the National List.
Glycerin	<p>Specific comments describing the use of this substance on organic farms: It is an ingredient in a teat dip that is used at each of 2 daily milkings on each milking cow. It provides an emollient to the teat dip to keep cow's teats from chapping and getting irritated. This is especially important in the winter.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Don't know of any alternative.</p>
Hydrogen Peroxide	<p>Specific comments describing the use of this substance on organic farms: We use hydrogen peroxide as a sanitizer in the twice daily washing of the individual wash cloths used to prep the cows for milking. Also used for sanitizing of calf pails and bottles, etc.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Chlorine dioxide may be an effective alternative. I recently read an article in a farm magazine that reported that chlorine dioxide is the most effective disinfectant for use with calf feeding equipment, but we haven't tried it yet.</p>
Magnesium Hydroxide	<p>Specific comments describing the use of this substance on organic farms: Will use for the extremely occasional cow with bowel function problems.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Not sure as it is an issue we don't often have so haven't researched the alternatives.</p>
Magnesium Sulfate	<p>Specific comments describing the use of this substance on organic farms: We use epsom salts to occasionally soak sore or infected feet on cows.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Although regular salt could be used as a foot soak, not sure that it would be quite as effective as magnesium sulfate.</p>
Oxytocin	<p>Specific comments describing the use of this substance on organic farms: We have never found it needed since we have been producing organic milk these last 17 years To help fresh cows give their milk down so they have complete milk out to prevent illness. Used on a selective basis but vital when we need it.</p> <p>Specific comments regarding the availability and efficacy of alternatives: To help drop placenta: giving the cow warm water, milking her, giving oral calcium Let down of milk: gentle treatment and stroking of the udder. There are few, if any, alternatives that are as effective.</p>
Parasiticides— Fenbendazole, Ivermectin, & Moxidectin	No responses received
Peroxyacetic/Peracetic Acid	<p>Specific comments describing the use of this substance on organic farms: It is the sanitizer that we use twice a day in our milking system wash regime and</p>

	<p>every other day for our bulk tank washing.</p> <p>Specific comments regarding the availability and efficacy of alternatives: It has a longer kill time than chlorine as well as the acetic acid in it functions as a mineral remover to keep milkstone from building up no equipment.</p>
Phosphoric Acid	No responses received
Poloxalene	<p>Specific comments describing the use of this substance on organic farms: We have never had a case of pasture bloat but I would also like to have poloxalene on the list in case we started having problems with it.</p> <p>Specific comments regarding the availability and efficacy of alternatives: No responses received</p>
Tolazoline	No responses received
Xylazine	<p>Specific comments describing the use of this substance on organic farms: It is used by the vet when an animal needs to be sedated for a procedure, such as a displaced abomasum roll and tack, removal of a horn, or treating a broken bone.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Not sure, that is the vet's expertise. Xylazine is their preference over lidocaine so must be it is more effective for the particular need.</p>
Copper Sulfate	<p>Specific comments describing the use of this substance on organic farms: It is not used as foot bath ingredient. Copper is toxic to sheep and permanently stains wool. Foot issues</p> <p>Specific comments regarding the availability and efficacy of alternatives: There are none. Zinc Sulfate works very well for sheep. Zinc sulfate is currently in a petition process.</p> <p>If Zinc Sulfate becomes allowed as hoof treatment in organic livestock production, will you continue to use Copper Sulfate to treat organic animals? No. Zinc Sulfate should be allowed if only for sheep only. Not sure because I don't know how its effectiveness compares.</p>
Formic Acid	No responses received
Iodine	<p>Specific comments describing the use of this substance on organic farms: For the sanitation of using any treatments on cattle that need attention We use iodine teat dips at every milking on every lactating cow to clean and sanitize the cows prior to milking and to provide residual anti-bacterial effect post milking. We use iodine teat dip daily both as a pre-dip to cleanse and prepare the cows for milking and a post-dip to provide residual bacteriacidal action post milking. It helps us achieve and maintain a low bacteria and somatic cell count in our milk shipped as well as reduces the likelihood of mastitis. It is used in our dairy operation as a teat dip to prevent mastitis We routinely use iodine to disinfect the navels of newborn calves; sometimes it is used as a wound dressing.</p>

	<p>It is used in teat dip daily and all newborn calves have navels dipped in it. It is used to disinfect wounds as needed.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Not sure that others are as effective against as wide a spectrum of bacteria and have as long a residual effect. Iodine is the best all round teat dip currently available in organic production. I am not aware of anything listed organic that is economical and effective in the uses listed above. In teat dips there is no viable alternative. We have tried using several different dips in winter and the only one we have found to prevent damage from cold is iodine based. We also use a barrier dip that contains iodine in wet weather. In normal conditions we use a 3rd type of dip which also has iodine in it.</p>
Lidocaine	<p>Specific comments describing the use of this substance on organic farms: For the rare surgical procedure by the vet.</p> <p>Specific comments regarding the availability and efficacy of alternatives: No responses received.</p>
Lime, Hydrated	No responses received
Mineral Oil	No responses received
Procaine	No responses received
Sucrose Octanoate Esters	No responses received
Trace Minerals & Vitamins	<p>Specific comments describing the use of this substance on organic farms: Free choice. Very important as the cattle need their vitamins so to speak. Health of preg cows, calves and bulls. Part of the mineral package our cows eat daily. Trace minerals are vital to our dairy animals for health and well being. We use organic (redmond brand) trace minerals with selenium; Our area is a selenium deficient and it is necessary as an additive to maintain animal health and a good breeding program.</p> <p>Specific comments regarding the availability and efficacy of alternatives: Nothing can take the place of needed vitamins and trace minerals needed in the diet for healthy, productive livestock. There are no alternatives We do not have very many choices for organic trace minerals with selenium; Availability is sporadic (trying to buy ahead when possible) There is a redmond salt block with selenium that we can not use because of the binder in the block...such a minute item makes our choices even more limited.</p>
EPA Inert Ingredients (List 4)	No responses received
Excipients, for use in the manufacture of livestock drugs	<p>Specific comments describing the use of this substance on organic farms: They likely in fluid vitamins, biologics, or other liquid health care products that we occasionally use.</p>

	Specific comments regarding the availability and efficacy of alternatives: No responses received.
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In closing, we thank the Board for its time and commitment. OTA is committed to collecting information from our broad membership and beyond in order to assist NOSB in determining whether or not a substance on the National List remains necessary in organic livestock production.

Again, 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,



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Organic Trade Association

cc: Laura Batcha
Executive Director / CEO
Organic Trade Association