



October 4, 2018

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-18-0029

RE: Livestock Subcommittee – 2020 Sunset Reviews

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board (NOSB) on its 2020 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.

OTA thanks NOSB for carefully considering each livestock production material scheduled for review as part of the 2020 Sunset Review cycle. Materials placed on 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. 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.

About OTA Sunset Surveys

OTA is submitting results to our Sunset Surveys created for each input under review as part of the 2020 Sunset Review cycle. These electronic surveys include 7-10 questions addressing the **necessity (crop and livestock) or essentiality (handling)** of each input. See Appendix A for a sample survey. Our surveys do not address information regarding the impacts on human health or the environment.

The surveys are open to any NOP certified organic operation. The names of the companies submitting the information are confidential (not disclosed to OTA). To ensure wide distribution of the surveys beyond OTA membership, OTA worked with Accredited Certifying Agencies (ACAs) and the Organic Materials Review Institute (OMRI) to distribute the survey to all of their clients as well as to targeted clients they

know are using the inputs under review. OTA also worked through its Farmers Advisory Council¹ to help assist in distribution to NOP certified farmers.

Results of OTA Sunset Surveys

OTA has received **15** responses on our 2020 Livestock Sunset Surveys. Below is a summary of the feedback received via OTA’s Sunset Surveys to date. New responses received since the spring 2018 meeting are highlighted and marketed as “new.” Because most of the 2020 Sunset materials were recently reviewed under the 2017 Sunset cycle, we have included the comments we received at that time as well.

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

Substance	Survey Information
Alcohols: Ethanol & Isopropanol	<p><u>2020 Sunset (2 responses):</u> Producer Comment: Used for equipment sterilizing. This is a critical material in organic livestock production. Producer Comment: Alcohols – needed for disinfecting and potential sites of cuts, abrasions, or any operable or maintenance of vet procedures. This is a critical material in organic livestock production.</p> <p><u>2017 Sunset:</u> Specific comments describing the use of this substance on organic farms: We use isopropyl 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. Used to disinfect teat ends for taking milk samples, needles/syringes used for vaccines or oral treatments aka garlic. Mostly for disinfecting vaccine bottle tops. We store our IV in a container filled with Isopropyl alcohol. If we are out of iodine, we use it to dip calves navels.</p> <p>Specific comments regarding the availability and efficacy of alternatives: What alternatives? None that I would use</p>
Aspirin	<p><u>2020 Sunset (4 responses):</u> Producer Comment (new): Aspirin is used to relieve pain and decrease inflammation in poultry, which improves the birds’ ability to obtain feed and water and retain mobility. No suitable alternatives have been identified. Despite our best preventive care programs, biosecurity enhancements and vaccine programs, birds continue to be challenged with leg health. Issues such as Reovirus, trembling disease and other genetic factors have no treatment options even in conventional programs.</p>

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 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.

Producer Comment (new): For pain relief for minor injuries. Few items as economically feasible and widely available.

Producer Comment: Used for pain management. This is a critical material in organic livestock production.

Producer Comment: It is the only real-time responsive form for inflammation and fever management available. There are other products but they do not offer the same type of timely response to ensure animal health and well-being. This is also a proven remedy and is critical in organic livestock production.

2017 Sunset:

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

We give this routinely to cows with mastitis. The swelling that often accompanies mastitis blocks the milk flow from the udder, allowing the infection to grow.

Aspirin is very effective at reducing swelling, allowing the udder to clear itself of bacteria-laden milk, thus aiding the cow to heal herself. Aspirin also increases the

comfort level of the cow suffering from mastitis, which is very painful. If she is experiencing less pain, she is more likely to fully let down her milk, which will aid recovery for the same reasons. There is an animal welfare issue here. I don't

like to see my cows in pain. I would hate to think of organic dairy as being more painful for the cows than conventional. I like aspirin a lot because it treats the

symptoms (pain, swelling) and allows the cow to more effectively cure herself. Taking away aspirin would remove the best tool in our anti-mastitis toolbox. I

think it's possible that the SSC's of the organic industry as a whole might rise as a result. Also something like this might push me to consider retiring from farming.

It is necessary to give pain relief, or relief of swelling to our cows. It would be inhumane not to.

Aspirin is occasionally used to give relief to livestock in emergencies. It is effective and simple to administer, and provides humane relief to livestock

Specific comments regarding the availability and efficacy of alternatives:

Not sure what else would easily take its place. Flunixin is currently allowed but we very seldom use it and would need to get it from a vet. I believe its

administration route is intravenous, which we would prefer not to have to do vs. giving aspirin orally. Also, Flunixin requires a holdout period whereas aspirin doesn't. Perhaps we could give white willow bark but don't know its efficacy or

dosage.

There are some alternatives but seem to be harder to source.

None that I am aware of that are currently listed.

	<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> <p>The only thing I can think of is banamine. I've got to think aspirin is a better alternative.</p>
<p>Biologics—Vaccines</p>	<p>2020 Sunset (3 responses):</p> <p>Producer comment (new): Used for disease prevention. Healthy animals are essential especially when antibiotics cant be used.</p> <p>Producer Comment: Used for disease prevention. There are no alternatives, and the material is critical for organic livestock production.</p> <p>Producer Comment: Used as a preventative, functions as a means to boost the immune system to aid animals in naturally fighting off ailments. There are no alternatives, and the material is critical for organic livestock production.</p> <p>2017 Sunset:</p> <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 five types of biologics--an <i>e-coli</i> vaccination on the milking herd to reduce the incidence and severity of case of <i>e-coli</i> mastitis, a clostridium vaccination on the young stock after we had some cases of blackleg appear suddenly out of seemingly nowhere that quickly killed several young stock several years ago, a different <i>e-coli</i> vaccination given to dry cows to increase the immunity their colostrum will carry to the calves to reduce the incidence and severity of <i>e-coli</i> scours, a biologic given to newborn calves to give immunity against <i>e-coli</i> and other bacteria, and a general use biologic given to cows or young stock hit by an active case of something to help stimulate their immune system.</p> <p>With antibiotics forbidden, vaccines are the only way 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 lepto, blackleg and other Clostridial diseases. We also need protection for Tetanus and IBR, BVD and BRVD. The use of these vaccines makes 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 (<i>E. coli</i>, roto and corona viruses) leading to substantial death loss of young and yearling calves.</p> <p>We vaccinate for a number of diseases. Since we are limited in the treatment allowed for organic production, the best thing is to not get a disease that needs to be treated. More cows would have to be diverted from organic production without vaccines.</p> <p>Prevention of disease control of existing disease</p> <p>Specific comments regarding the availability and efficacy of alternatives:</p>

	<p>These are readily available vaccines and very efficacious. Without the <i>e-coli</i> mastitis vaccine, cows will often die when hit with <i>e-coli</i> mastitis as it is often very acute and toxic to the cow. Before using the <i>e-coli</i> 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 <i>e-coli</i> 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. Vaccines are widely available without a prescription and we have found them to be a cost-effective way to keep cattle healthy.</p> <p>Unknown</p>
<p>Electrolytes—without antibiotics</p>	<p><u>2020 Sunset (2 responses):</u></p> <p>Producer Comment: Used for rehydration of cows, and it is a critical material in organic livestock production.</p> <p>Producer Comment: Used as an aid in ensuring that animals can fight off ailments with supportatives; and it is a critical material in organic livestock production.</p> <p><u>2017 Sunset:</u></p> <p>Specific comments describing the use of this substance on organic farms:</p> <p>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>Improving dehydration in animals sick for any reason</p> <p>It is necessary if a cow becomes dehydrated</p> <p>It is used for shipping stress and heat stress and in general for hydration of poultry. When chicks are sent by mail, they risk exposure to either heat or cold - electrolytes are recommended by hatcheries upon arrival to help get the chicks settled and eating. During times of severe heat in pasture, the electrolytes help keep hens in production and hydrated.</p> <p>Specific comments regarding the availability and efficacy of alternatives:</p> <p>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.</p> <p>Most farm stores carry non-medicated electrolytes, usually quite effective.</p> <p>I don't know of anything other than prayer</p>
<p>Glycerin</p>	<p><u>2020 Sunset (1 response):</u></p> <p>Producer Comment: Ensures that teat dips adhere to teat ends and provide maximum protection to teat end and skin conditioning to prevent chapping. There are no alternatives and properly functioning teat tips are essential to organic dairy.</p> <p><u>2017 Sunset:</u></p> <p>Specific comments describing the use of this substance on organic farms:</p>

	<p>It is an ingredient in a teat dip that is used at each of two 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>
Hydrated Lime	<p><u>2020 Sunset (1 response):</u> Producer Comment: Used as a parasiticide for external parasites. It is critical on our organic dairy.</p>
Mineral Oil	<p><u>2020 Sunset (2 comments):</u> Producer Comment: It is used as a lubricant or other medicinal aid, and it is a critical material. Producer Comment: It is used topically for a variety of issues, and it is a critical material.</p> <p><u>2017 Sunset:</u> Specific comments describing the use of this substance on organic farms: Used for lubrication for AI breeding. We have never used mineral oil at the current farm that I am at as the herd manager, but I have used mineral in the past on cattle and find that it is an effective method to control flies when used as delivery method for parasiticides. We support the use of mineral oil as a delivery method to apply organic certified fly controls. Water as a delivery is economically not viable as its nature to evaporate almost instantly. Mineral oil is used in conjunction with Crystal Creek fly product as a pour on. The mineral oil keeps the treatment working longer.</p> <p>Specific comments regarding the availability and efficacy of alternatives: None. Some fly treatments have coconut oil but there are some folks with sensitivity to that substance. One farmer reported that this year no more than one cup of mineral oil was used per cow</p>
Phosphoric Acid	No Comments Received
Sucrose octanoate esters	No Comments Received

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,



Johanna Miranda
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association

Appendix A – Survey Questions (Example: Glycerin)

1. Please describe the type(s) of livestock raised on your operation:

2. How many acres do you have under certified organic management?

3. Where is your organic livestock production located (state, region, country, etc):

4. With what frequency does your operation use glycerin?

Never

Seldom

Occasionally

Routinely

5. Describe how glycerin is used in your operation and why it is necessary:

6. Describe the availability and efficacy of allowed alternatives for glycerin:

7. Describe the effects to your operation should you no longer be allowed to use glycerin:

Agronomic effects (effects to health of livestock):

Environmental effects (effects to environment if the substance was no longer allowed AND effects to environment from potential alternatives):

Economic effects (effects to economic health of your operation):

8. Based on your answers to the four questions above, rate the necessity of glycerin (i.e. how necessary is this substance to the continued success of your organic livestock operation?):

1 Less Necessary	2	3	4	5 More Necessary	6	7	8	9	10 Critical
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9. Does your company intend on submitting comments directly to NOSB regarding the sunset review of glycerin?

- Yes
- No

If you would like assistance or guidance in submitting comments to NOSB, please provide your email address, and OTA staff will contact you directly: