



October 3, 2019

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-19-0038

RE: Livestock Subcommittee – 2021 Sunset Reviews

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board (NOSB) on its 2021 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 2021 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 2021 Sunset Review cycle. These electronic surveys include about 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 17 responses on our 2021 Livestock Sunset Surveys (15 new responses since the spring meeting). Below is a summary of the feedback received via OTA’s Sunset Surveys to date.

§205.603 – Synthetic substances allowed for use in organic livestock production.

Substance	# of responses	Summary of responses	Average rating of Necessity (from 1 to 5, with 1 being “unnecessary” and 5 being “critical /would leave organic without it”)
Atropine	1	The material is necessary because: <ul style="list-style-type: none"> - Used as needed for dairy livestock as an antidote for organophosphate insecticide (and other cholinesterase inhibitor) toxicosis and some gastrointestinal applications (excessive salivation, diarrhea). 	5
Hydrogen Peroxide	2	The material is necessary because: <ul style="list-style-type: none"> - Used to disinfect/sanitize hoof infections - Used to disinfect/sanitize medical equipment for Displaced Abomasum Surgery or other emergency procedures - Used as a pre and post teat dip in dairy livestock as a disinfectant to protect teat from bacterial infection between cows. - A general disinfectant (active against cryptosporidia, an important pathogen of calves, for example). If the material were prohibited: <ul style="list-style-type: none"> - Negative agronomic effects: mastitis, hoof rot - Unsafe working conditions for workers 	5
Iodine	2	The material is necessary because: <ul style="list-style-type: none"> - Used routinely as a teat dip, calf naval dip, and disinfectant for hoof treatment - Used as a general disinfectant 	5
Magnesium sulfate	1	The material is necessary because: <ul style="list-style-type: none"> - Used orally as needed in dairy livestock as a laxative and as a treatment for hypomagnesemic tetany (a life-threatening electrolyte disturbance of grazing cattle). 	5
Fenbendazole	2	The material is necessary because: <ul style="list-style-type: none"> - Needed as a tool for emergencies for dairy animals as a dewormer when preventative measures are not effective. 	4

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.

		<ul style="list-style-type: none"> - Effective as a parasiticide useful in treating both young and adult cattle. Has the benefit of a label for milking cows, and is thus useful for lungworm infestations, which can be problematic in grazing cows. 	
Moxidectin	1	<p>The material is necessary because:</p> <ul style="list-style-type: none"> - Used as needed for dairy cattle as an effective parasiticide that does not harm beneficial dung beetles 	5
Peracetic acid	2	<p>The material is necessary because</p> <ul style="list-style-type: none"> - Used daily/routinely as a food contact surface sanitizer in CIP process per FDA limitations to sanitize raw milk tankers - Surface disinfectant 	5
Xylazine	0		
Methionine	4	<p>Note: In addition to survey responses summarized here, please also see the separate comment submitted by the Organic Trade Association on this material.</p> <p>The material is necessary because:</p> <ul style="list-style-type: none"> - Used to provide an essential amino acid to organic poultry - Used to ensure proper growth and production of organic poultry <p>Alternatives are not sufficient because:</p> <ul style="list-style-type: none"> - No alternatives are commercially available to synthetic methionine - Outdoor access can provide some of the methionine need. Other respondent(s) say that pasture producers almost zero methionine. All respondents report challenge in climates where insects are not naturally occurring year round, when it is not possible get enough methionine into the diet without supplementation. - Cannot get close to a balanced ration without methionine. - Over-feeding protein can lead to too much nitrogen in the manure which contribute to nitrogen runoff challenges - Much higher amounts of protein would need to be fed which in turn would create higher nitrogen loads to hen housing and environment on outdoor grounds <p>If the material were prohibited:</p> <ul style="list-style-type: none"> - Reduced egg production - Decreased broiler growth - Severe deficiencies especially during the growing stages of replacement pullets - Bird health would suffer; Unhealthy/dead chickens - Would leave organic production 	5
Trace minerals	1	<p>The material is necessary because:</p> <ul style="list-style-type: none"> - Essential nutrients included in dairy livestock rations needed for metabolic functions such as growth/development, immunity and reproduction. 	5
Vitamins	1	<p>The material is necessary because:</p> <ul style="list-style-type: none"> - Essential nutrients included in dairy livestock rations needed for proper animal function such as growth/development, immunity and reproduction. 	5

		Alternatives are not sufficient because: - Bioavailability in feedstuffs is highly variable	
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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,



Johanna Mirenda
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association

Appendix A – Sample Survey for Crop and Livestock Inputs

1. Please describe the types of organic products produced or handled on your operation:
2. How many states are your products sold in? Are they exported to other countries?
3. How many years has your operation been certified organic?
4. Which organic products do you use the substance on/for? (e.g., lettuces, fruit trees, broiler chickens)
5. What function does the substance provide and why is it necessary? (e.g., to control a specific pest or disease, sanitation, etc.)
6. With what frequency does your operation use the substance? (e.g., seldom, as needed when a certain condition arises, routinely, etc.)
7. Have you tried using any *natural substances* as an alternative to the substance? (e.g., natural oils instead of synthetic pesticides) If so, please describe the availability and efficacy of the alternative substances:
8. Are there any other *management practices* that would eliminate the need for the substance? (e.g., hand weeding instead of using an herbicide; or using a particular harvesting practice to avoid a disease instead of using a fungicide). If so, please describe the efficacy of the alternative management practices:
9. Describe the effects to your operation if you were to no longer be allowed to use this substance in organic production:
 - Agronomic effects (effects to health of crops or livestock):
 - Environmental effects (effects to environment if the substance was no longer allowed; effects to environment from potential alternatives):
 - Economic effects (effects to economic health of your operation):
10. On a scale from 1 to 5 stars, rate the overall necessity of this substance for your organic operation:

Unnecessary (don't need it at all)	Neutral (nice to have but could live without it)	Critical (would leave organic without it)
★	★	★