



September 29, 2022

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP

**Docket: AMS-NOP-22-0042**

**RE: Livestock Subcommittee – 2024 Sunset Reviews**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board (NOSB) on its 2024 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 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 2024 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 hears 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 2024 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) 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 Council (ota.com/FAC) to help assist in distribution to NOP certified farmers.

**Results of OTA Sunset Surveys**

OTA has received **5 responses** on our 2024 Livestock Sunset Surveys. 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	Summary of Responses	Average rating of Necessity (from 1 to 5, with 1 being “unnecessary” and 5 being “critical /would leave organic without it”)
<b>Chlorhexidine</b>	<p><b>1 Response</b> received from a certified organic operation raising dairy cattle.</p> <p><b>Necessary because:</b></p> <ul style="list-style-type: none"> <li>- It is an effective topical disinfectant and surgical equipment sanitizer that is essential to organic livestock production.</li> <li>- Chlorhexidine is an alternative to iodine, isopropanol and hydrogen peroxide and each are used to minimize and/or eliminate disease-causing microorganisms</li> </ul> <p><b>Frequency of use:</b></p> <ul style="list-style-type: none"> <li>- As needed for sanitizing surgical equipment</li> </ul> <p><b>How often is chlorhexidine used as an aid in controlling bacteria that causes mastitis?</b></p> <ul style="list-style-type: none"> <li>- Never but keep as an option</li> </ul> <p><b>Have you tried using any other substances as an alternative to Chlorhexidine?</b></p> <ul style="list-style-type: none"> <li>- Yes</li> </ul> <p><b>If Chlorhexidine were to be prohibited:</b></p> <ul style="list-style-type: none"> <li>- Removal of chlorhexidine from the National List may create animal health concerns, as the efficacy of this substance is significant.</li> </ul>	<b>4 out of 5</b>

<p><b>Glucose</b></p>	<p><b>1 Response</b> received from a certified organic operation raising dairy cattle.</p> <p><b>Necessary because:</b></p> <ul style="list-style-type: none"> <li>- This substance is administered to cattle for the treatment of metabolic abnormalities, including low energy. Glucose (dextrose) is also a potential ingredient within electrolyte formulations. A critical time in an animal's stage of production is just prior to calving. Rations are adjusted to meet the animal's changing energy demands. Therefore, it is essential to have glucose available in the event it is needed.</li> </ul> <p><b>Frequency of use:</b></p> <ul style="list-style-type: none"> <li>- As needed</li> </ul> <p><b>Is further clarification needed for this substance on the National List?</b></p> <ul style="list-style-type: none"> <li>- No</li> </ul> <p><b>Have you tried using any other substances as an alternative to Glucose?</b></p> <ul style="list-style-type: none"> <li>- Yes</li> </ul> <p><b>Are there any other management practices that would eliminate the need for Glucose?</b></p> <ul style="list-style-type: none"> <li>- No</li> </ul> <p><b>If Glucose were to be prohibited:</b></p> <ul style="list-style-type: none"> <li>- This is an essential material, and its removal may create animal health concerns</li> </ul>	<p>5 out of 5          stars          (Critical/          would leave          organic          without it)</p>
<p><b>Tolazoline</b></p>	<p>No survey responses have been submitted so far.</p>	
<p><b>Copper sulfate</b></p>	<p><b>2 Responses</b> received from certified organic livestock operations raising dairy cattle.</p> <p><b>Necessary because:</b></p> <ul style="list-style-type: none"> <li>- Used as a foot bath to control foot fungus.</li> <li>- Feet Issues</li> </ul> <p><b>Frequency of application:</b></p> <ul style="list-style-type: none"> <li>- Daily, in foot bath cows walk in and put onto infected feet daily under a wrap</li> <li>- As needed</li> </ul> <p><b>Have other foot bath treatments of similar efficacy come on to the market?</b></p> <ul style="list-style-type: none"> <li>- No</li> <li>- No alternatives are effective that I know of.</li> </ul> <p><b>Can the consistent use of foot trimming allow for the elimination of copper sulfate on dairy farms?</b></p> <ul style="list-style-type: none"> <li>- No</li> </ul>	<p>5 out of 5          (Critical /          would leave          organic          without it)</p>

	<p><b>If copper foot baths were to be prohibited:</b></p> <ul style="list-style-type: none"> <li>- What would I use for hoof fungus? I fear I would have a lot more lameness and I would be culling cows much more frequently for a controllable issue.</li> <li>- Huge Negative effects; Decline in Animal Welfare</li> </ul>	
<p><b>Elemental sulfur</b></p>	<p>No survey responses have been submitted so far.</p>	
<p><b>Lidocaine</b></p>	<p><b>1 response</b> received from a certified organic operation raising dairy cattle.</p> <p><b>Necessary because:</b></p> <ul style="list-style-type: none"> <li>- This substance is used as a local anesthetic and is essential for minimizing pain and stress in animals</li> </ul> <p><b>Frequency of use:</b></p> <ul style="list-style-type: none"> <li>- Often</li> </ul> <p><b>Are there alternatives to Lidocaine</b></p> <ul style="list-style-type: none"> <li>- No</li> </ul> <p><b>Are there any other management practices that would eliminate the need for Lidocaine?</b></p> <ul style="list-style-type: none"> <li>- No</li> </ul> <p><b>If Lidocaine were to be prohibited:</b></p> <ul style="list-style-type: none"> <li>- Lidocaine is essential for animal welfare for managing pain especially during de-budding horns</li> </ul>	<p><b>5 out of 5          (Critical /          would leave          organic          without it)</b></p>

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 Mirinda  
 Farm Policy Director  
 Organic Trade Association

cc: Tom Chapman, CEO  
 Organic Trade Association

## Appendix A – Sample Survey for Crop and Livestock Inputs

1. Is your operation certified organic? Yes / No
2. Is [SUBSTANCE] included in your organic system plan? Yes / No
3. Which types of organic crops or livestock products do you use [SUBSTANCE] on/for? (e.g., lettuces, fruit trees, broiler chickens)
4. What function does [SUBSTANCE] provide and why is it necessary? (e.g., to control a specific pest or disease, sanitation, etc.)
5. With what frequency does your operation use [SUBSTANCE]? (e.g., seldom, as needed when a certain condition arises, routinely, etc.)
6. Have you tried using any *other substances* as an alternative to [SUBSTANCE]? (e.g., other substances that are on the National List and/or other natural substances.)  
If yes, please describe which substances you've tried and whether it was effective to fulfill the required function:
7. Are there any other *management practices* that would eliminate the need for [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:
8. How would your organic production be impacted if [SUBSTANCE] was no longer allowed? (describe the agronomic, environmental or human health effects, product quality, economic effects)
9. [If applicable - Insert specific questions from NOSB Subcommittee about the necessity of the substances and the availability of alternatives]
10. On a scale from 1 to 5 stars, rate the overall necessity of [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)

