

April 3, 2024

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

Docket: AMS-NOP-23-0075

RE: Livestock Subcommittee – 2026 Sunset Reviews

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board (NOSB) on its 2026 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. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, and others. OTA's mission is to grow 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 crop production material scheduled for review as part of the 2026 Sunset Review cycle. Materials placed on the National List for use in organic crop 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 (OPPA 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 and stakeholders in the organic community 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 2026 Sunset Review cycle. These online surveys include questions addressing the **necessity (crop and livestock)** or **essentiality (handling)** of each input, as well as any questions posed by the Board. 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 remain confidential and are not disclosed to OTA unless there is interest in providing contact details for follow up information.

Results of OTA Sunset Surveys

Below is a summary of the feedback OTA has received to date on our livestock materials sunset surveys. OTA will open these surveys again when the comment period opens for the fall meeting and share any further comment received at that time.

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

Substance	Summary of Responses
Hydrogen peroxide	<p>Responses received from certified organic livestock operations raising poultry</p> <p>Use</p> <ul style="list-style-type: none"> - As a sanitizer for prevention and treatment if necessary <p>Have you tried alternative substances or management practices?</p> <ul style="list-style-type: none"> - Yes, but it is important to have different modes of action, to allow for a rotation of products, keeping efficacy high. <p>How necessary is this substance to your operation?</p> <ul style="list-style-type: none"> - Essential
Magnesium sulfate	<p>Responses received from certified organic livestock operations</p> <p>Use</p> <ul style="list-style-type: none"> - As disinfectants, sanitizer, and medical treatments as applicable <p>Have you tried alternative substances or management practices?</p> <ul style="list-style-type: none"> - No, there are no non-synthetic alternatives for this.
Fenbendazole	<p>Responses received from certified organic livestock operations raising cattle</p> <p>Use</p> <ul style="list-style-type: none"> - As a parasiticide <p>Have you tried alternative substances or management practices?</p> <ul style="list-style-type: none"> - No alternatives in a rescue situation. There are natural alternatives used preventatively. <p>How necessary is this substance to your operation?</p> <ul style="list-style-type: none"> - Essential <p>NOSB questions to stakeholders</p> <ol style="list-style-type: none"> 1. How do certifiers mitigate consistent repeat use of parasiticides? Unsure how certifiers mitigate this, but we recommend certifiers not giving this approval without a veterinarian's professional recommendation. From our perspective, we see primarily rescue treatments on severely parasitized animals. There are no organic alternatives in a rescue situation. The removal of treated animals from the organic meat market is a strong incentive to not overuse. 2. Are there suggestions to improve the annotation? Proof of a need for treatment could include written documentation, fecal test, and/or recommendation from a vet for emergency treatment. We want to be cautious on requiring this of producers as to not add additional burdens that could lend itself to poor welfare. If treatment is required, certifiers could request an update to their plan to reduce the need for this in the future. Maybe we could provide guidance to certifiers on how to evaluate this. 3. Which age/class of animal do certifiers see their clients requesting approval for emergency parasiticide use?

	<p>Intestinal parasites are seen almost exclusively in 6–18-month-old cattle. Lungworm is a growing concern and affects both youngstock and mature cattle. Unsure of which age/class of animal certifiers are getting these requests for, but that is our knowledge & experiences of parasites in cattle.</p> <p>4. How often do certifiers request copies of fecal sample test results to confirm the parasite load in a herd prior to allowing an emergency treatment with parasiticides?</p> <p>Unsure of this, but support certifiers confirming the use of parasiticides with these test results or other vet recommendation. We do not support additional barriers for farmers to not treat their animals.</p> <p>Additional comments</p> <ul style="list-style-type: none"> - I am a veterinarian but now work for an organic milk processor so I have worked with organic farms in different relationships. I have found that often producers aren't even aware that they are able to use parasiticides. I do believe that the grazing practices many producers utilize do help prevent excessive parasite burdens but there are always animals that become overwhelmed. I think it is imperative to have compounds available to use when organic treatments and measures do not work.
Moxidectin	<p>Responses received from certified organic livestock operations raising cattle</p> <p>Use</p> <ul style="list-style-type: none"> - As a parasiticide <p>Have you tried alternative substances or management practices?</p> <ul style="list-style-type: none"> - NA <p>How necessary is this substance to your operation?</p> <ul style="list-style-type: none"> - Essential <p>Additional comments</p> <ul style="list-style-type: none"> - I am a veterinarian but now work for an organic milk processor so I have worked with organic farms in different relationships. I have found that often producers aren't even aware that they are able to use parasiticides. I do believe that the grazing practices many producers utilize do help prevent excessive parasite burdens but there are always animals that become overwhelmed. I think it is imperative to have compounds available to use when organic treatments and measures do not work.
Xylazine	<p>Responses received from certified organic livestock operations raising cattle</p> <p>Use</p> <ul style="list-style-type: none"> - As a sedative <p>Have you tried alternative substances or management practices?</p> <ul style="list-style-type: none"> - No <p>How necessary is this substance to your operation?</p> <ul style="list-style-type: none"> - Essential <p>Additional comments</p>

	<ul style="list-style-type: none"> - Xylazine is an essential sedative when working with cattle. It can be used in larger doses to lay an animal down for surgery or other procedure. It can also be used in smaller doses to calm a fractious animal.
DL-methionine	<p>Please see our comments on this substance, submitted separately</p>
Trace minerals	<p>Responses received from certified organic livestock operations</p> <p>Use</p> <ul style="list-style-type: none"> - As feed additives <p>Have you tried alternative substances or management practices?</p> <ul style="list-style-type: none"> - No other replacements and management practices do not change nutrient absorption/enzymatic function in the animal <p>How necessary is this substance to your operation?</p> <ul style="list-style-type: none"> - Essential <p>NOSB questions to stakeholders</p> <ol style="list-style-type: none"> 1. Are there effective non-synthetic alternatives to some or all synthetic trace mineral feed supplements? <ul style="list-style-type: none"> - No <p>Additional comments</p> <ul style="list-style-type: none"> - Trace Minerals are essential for enzymatic functions in the animal. We cannot rely on the trace minerals in the commodities for consistent results.
Vitamins	<p>Responses received from certified organic livestock operations</p> <p>Use</p> <ul style="list-style-type: none"> - As feed additives <p>Have you tried alternative substances or management practices?</p> <ul style="list-style-type: none"> - No other alternatives exist. <p>How necessary is this substance to your operation?</p> <ul style="list-style-type: none"> - Essential <p>NOSB questions to stakeholders</p> <ol style="list-style-type: none"> 1. What are common uses of vitamin B and K feed supplements? Are they necessary for good ruminant health? <ul style="list-style-type: none"> - Vitamin B is essential for poultry health, providing many metabolic pathways in the animal. Deficiency would be common if these were not allowed. - Vitamin K is synthesized in the rumen and is not essential to supplement. Vitamin B is generally incorporated in mineral mixes and is essential as a coadjuvant with A, D, and E. Vitamin B is also used as a treatment for ketosis. Supplementing with synthetic Vitamins B & K is not necessary for ruminant health. <ol style="list-style-type: none"> 2. How common are livestock vitamin products that are produced with excluded methods?

	<ul style="list-style-type: none">- As far as we know, this is not common. There are a series of yeast products that generate vitamins. GMO processes may or may not be involved in this across the board.
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3. Are there methods to detect livestock vitamin products produced using excluded methods?

- Unsure

Additional comments

- The absence of vitamin availability in a poultry ration would lead to animal welfare and deficiency outcomes.

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,



Scott Rice
Regulatory Director
Organic Trade Association

cc: Tom Chapman, co-CEO
Organic Trade Association