



April 14, 2016

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-15-0085

RE: Livestock Subcommittee – Lidocaine and Procaine

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board (NOSB) on its recommendations to modify the annotations and withholding times associated with Lidocaine and Procaine listed on the National List at § 205.603(a).

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 organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA supports the subcommittee's proposal to reduce the withholding times for Lidocaine and Procaine and support the subcommittee's reasoning for arriving at these recommendations. The proposal suggests reducing the withholding time from 90 days to 8 days for slaughter animals and from 7 days to 6 days for dairy animals. These are reasonable recommendations (2x the FDA recommended withholding times) supported by public comment and will ensure that producers are not performing physical alterations or other necessary surgeries without the aid of these important local anesthetics. Animal welfare on organic farms is of utmost importance, and we also recognize that consumers do not want organic products to be contaminated with livestock drugs.

Mandating a withholding time that is double the FDA recommendation should satisfy consumer expectations. Reducing withholding times from seemingly arbitrary and excessively long time periods will ensure that animal welfare is maintained when physical alterations and surgery are necessary.

We applaud NOSB for taking this bold step in balancing the needs of producers, with the welfare of organic livestock and expectations of organic consumers. The recommendation strikes this balance and we encourage the full Board to approve these changes.

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,



Nathaniel Lewis
Senior Crops and Livestock Specialist
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association