



October 8, 2015

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-15-0037

RE: Livestock Subcommittee (LS) – 2017 Sunset Review

- **Parasiticides (Ivermectin, Moxidectin, and Fenbendazole)**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board on its 2017 Sunset Review process and the subcommittee votes posted for the fall 2015 meeting.

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 the growth of organic trade to benefit the environment, farmers, the public and the economy.

OTA thanks NOSB for carefully considering each livestock production input scheduled to sunset in 2017. 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. We offer the following more detailed comments regarding the sunset recommendations on the continued use of parasiticides in organic livestock production

PARASITICIDES

The Need for More Than One Tool - Outreach to OTA membership indicates consensus that retaining only a single parasiticide on the National List (Fenbendazole), as the LS has voted, is not in the best interest of farmers or their livestock. Livestock producers only are allowed to use these substances for the emergency treatment of their animals—meaning without immediate effective treatment, the animals may die. Only providing a single parasiticide for producers—and one that does not yet have a long-term track record with producers—does not provide adequate treatment options.

Emergency Treatment – Sunset Review of parasiticides must be conducted within the context that these substances are only used for the emergency treatment of dairy animals, as slaughter stock treated with parasiticides cannot be labeled as organic. Producers report rarely, if ever, needing to use these substances since they generally rely on good pasture management, proper nutrition and animal husbandry to prevent

parasites. Understanding this context reveals two important aspects that NOSB should consider in its final decision about parasiticides:

1. The extremely infrequent use of parasiticides on organic farms means the corresponding effects on soil life is similarly small. NOSB must consider each substance on the National List for its potential adverse effects on humans and the environment. We challenge NOSB to consider these potential adverse effects within the context of extremely limited use and the potential consequence of animals unnecessarily suffering should they no longer be allowed.
2. Emergency situations require swift and effective treatments. Due to the myriad of parasites that can afflict animals, regional differences in the availability of livestock treatments, and various levels of experience and confidence among producers around particular parasiticides, it is critical that farmers continue to have a choice in how they can treat their animals when faced with an emergency situation.

A ‘Farmer Friendly’ Update to the National List – The LS has indicated its view that the National List should be updated and both Ivermectin and Moxidectin should be removed. We **do not agree** with this approach, and recommend that Moxidectin remain allowed for emergency treatment of organic dairy animals. The time for Ivermectin to be phased out of production may be here, and OTA would be comfortable with this substance’s removal from the National List. However we continue to acknowledge that removing proven tools used only under emergency situations has the potential for raising significant animal welfare concerns while only providing a limited potential for reducing adverse effects on soil organisms.

Ivermectin – OTA supports LS recommendation to remove

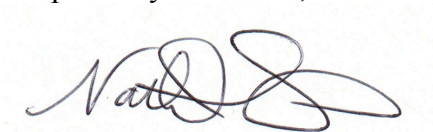
Moxidectin – OTA **does not** support LS recommendation to remove

Fenbendazole – OTA supports LS recommendation to re-list.

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. We challenge NOSB to consider parasiticides within the context of their use in organic systems, which is under emergency situations only. Eliminating treatments used only for emergencies has the potential for raising animal welfare concerns and should not be taken lightly.

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,

A handwritten signature in dark ink, appearing to read "Nathaniel Lewis". The signature is fluid and cursive, with the first name being more prominent than the last.

Nathaniel Lewis
Senior Crops and Livestock Specialist
Organic Trade Association



cc: Laura Batcha
Executive Director/CEO
Organic Trade Association