CCOF
Advancing organic agriculture through certification, education, advocacy, and promotion.

Ms. Michelle Arsenault
Advisory Committee Specialist
National Organic Standards Board, USDA-AMS-NOP
1400 Independence Ave. SW., Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-18-0071-0001

Re: Livestock Subcommittee: 2021 Sunset Reviews

April 4, 2019

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the 2021 Sunset Review of livestock substances on the National List of Allowed and Prohibited Substances.

CCOF is a nonprofit organization governed by the people who grow and make our food. Founded in California more than 40 years ago, today our roots span the breadth of North America. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

In the attached comments, we include the number of CCOF members who list the substance on their Organic System Plan (OSP) because it demonstrates the importance of the substance to organic production. Producers may routinely use all or some substances listed on their OSP, or they may only occasionally use listed substances for specific situations. Some substances are commonly used by organic producers while others are only listed by a few producers who rely on the substance for their site-specific conditions. Therefore, the NOSB should carefully consider the impacts of removing a substance that has been listed on an OSP because producers need a variety of tools available to them.

Our comments also describe how the substance is used by our members and, when possible, whether viable alternatives exist. This information is based upon our experience as a certifier and upon feedback from our members. Although we strongly encourage our members to comment, they do not always have the capacity to directly submit their own comments. Our goal is to relay valuable information about our members' materials and practices to help NOSB maintain a clear, consistent regulatory environment for organic producers of all scales and types.

Thank you for your review of our comments. Please do not hesitate to contact me for further information.

Sincerely,

Peter Nell
Government Affairs Manager

cc: Kelly Damewood, CEO
Jody Biergiel Colclough, Interim Chief Certification Officer, CCOF Certification Services, LLC

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CCOF's Comments on the 2021 Sunset Review
Livestock Scope Materials

The following comments are based on CCOF member input and CCOF's experience offering livestock certification for over 20 years and from certifying over 200 livestock operations. Our members produce a wide array of livestock including dairy, beef, poultry, and pork.

§ 205.603(a) – as disinfectants, sanitizer, and medical treatments as applicable

Atropine
No CCOF member lists atropine on their OSP.

Hydrogen peroxide
Many CCOF members use hydrogen peroxide. Hydrogen peroxide is readily available to organic producers and provides a cost-effective disinfectant and medical treatment with low risk to human and environmental health.

Magnesium sulfate
22 CCOF members list magnesium sulfate on their OSP. Magnesium sulfate can be used in a variety of livestock health situations.

Parasiticides, Fenbendazole; Parasiticides, Moxidectin
5 CCOF members list fenbendazole on their OSP. 20 CCOF members list moxidectin on their OSP. While good pasture management, selection of parasite-resistant stock, and other preventative practices are essential for managing parasites, emergency treatment options are still vital for organic producers. Even with good pasture management, high parasite loads can occur when other health issues compromise an animal or when new animals are brought on farm from an operation with different conditions.

With the removal of ivermectin from the National List, it is necessary to keep at least two parasiticide options available to limit parasite resistance from repeated use of a single parasiticide.

Peroxyacetic/peracetic acid
2 CCOF members list peroxyacetic/peracetic acid on their OSP. Peroxyacetic/peracetic acid is used for sanitizing facilities and processing equipment.

Xylazine
1 CCOF member lists xylazine on their OSP. Xylazine is a sedative and anesthetic that is only allowed in emergency treatments by veterinarians. The use of xylazine, and tolazoline to reverse its effects, is rare among CCOF members.

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§ 205.603(a) – as disinfectants, sanitizer, and medical treatments as applicable & § 205.603(b) – as topical treatment, external parasiticide or local anesthetic as applicable

Iodine
111 CCOF members list iodine or products including iodine on their OSP. Iodine is a very common ingredient in teat dips and is often used as a general disinfectant.

It appears that viable substitutes to toxic surfactants are available. Many manufacturers of teat dips are beginning to offer nonphenol polyethylene glycol ether (NPE)-free versions of their products and their use has increased amongst our membership in recent years. If NPE surfactants were prohibited in teat dips, it appears alternative options would be readily available.

§ 205.603(d) – as feed additives

DL-Methionine
The majority of poultry-raising CCOF members list methionine on their OSP. Methionine is an essential amino acid used in organic poultry production to assist with the development of chicks, metabolic processes, and for feathering. Methionine is also commonly included in pre-mixed feeds used by many poultry producers.

Trace minerals
Many CCOF members use products that include trace minerals. Trace minerals are included in many feed supplements and are critical in maintaining animal health through adequate nutrition.

Vitamins
Many CCOF members use products that include vitamins. Vitamins are the most commonly used mineral supplements. Providing animals with vitamin and mineral supplements is an integral component of preventative healthcare management systems. CCOF requires vitamin manufacturers to complete an affidavit verifying that the vitamins have been produced without genetic modification.

Ruminants receiving a significant portion of their diet from well-managed pasture may have a reduced need for vitamin supplementation. However, the quality and quantity of pasture available to producers may not always be sufficient to meet the nutritional demands of an animal. Additionally, an animal may also require increased supplementation during various stages of its life.

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