



CCOF

Organic Certification

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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-16-0100-0001

Re: Livestock Subcommittee Discussion Document: Clarifying “emergency” for use of synthetic parasiticides in organic livestock production

March 30, 2017

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Livestock Subcommittee’s discussion document “Clarifying ‘emergency’ for use of synthetic parasiticides in organic livestock production.”

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.

CCOF would support NOSB issuing a proposal to solicit feedback on specific language to include in guidance. The proposal should include specific methods and practices as well as define “emergency” use to ensure consistency among producers and certifiers. CCOF supports the limitation of synthetic pesticide use and recommends producers revisit their preventative practice plans to determine areas of improvement after use of synthetic parasiticides.

CCOF certifies over 200 livestock producers and provides the attached comments on the questions proposed in the discussion document. Please do not hesitate to contact me for further information.

Sincerely,

A handwritten signature in black ink that reads "Kelly Damewood".

Kelly Damewood
Director of Policy and Government Affairs

cc: Cathy Calfo, Executive Director/CEO
Jake Lewin, President, CCOF Certification Services, LLC

CCOF Comments on Livestock Subcommittee's Discussion Document: Clarifying "emergency" for use of synthetic parasiticides in organic livestock production

1. *Does the term "emergency" need to be defined?*

The term "emergency" should be defined.

2. *If so, how should the term "emergency" be defined?*

"Emergency" should be defined as a situation that significantly jeopardizes the well-being of the animal treated and/or threatens to undermine the overall preventative practices protecting the rest of the herd or operation. An emergency should be demonstrated by a recommendation from a veterinarian, fecal tests, or other specific, measurable methods to ensure consistent enforcement.

If an emergency were to arise, producers should then be required to revisit their preventative practice plan and determine areas of improvement to prevent future infestations and emergencies. Repeated use of synthetic parasiticides would be limited if the producer is required to examine and improve their preventative practice plan after each use.

3. *Should there be more specific guidelines, such as specific tests for parasite levels as part of the producer's parasite prevention plan, before it is determined that emergency treatment with an approved parasiticides might be needed?*

Yes, currently there are a wide variety of methods allowed to justify the use of parasiticides. Producers use fecal tests, veterinarian recommendations, FAMACHA systems, and more to determine whether their animals have parasites. Guidance on specific tests or methods would help ensure consistency among certifiers and producers. Accepted justifications might vary between certifiers

4. *What are the challenges for producers, inspectors, and certifiers in verifying the documentation and implementation of a parasite management plan in organic operations, and how might these be addressed?*

Implementing the suggested requirements would potentially require producers to maintain extra documentation and create more in-depth plans for preventative strategies that inspectors must verify and certifiers must then review. The increase in documentation would likely not be overly burdensome for producers, inspectors, or certifiers.