



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 – Parasiticides**

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 associated with the three synthetic parasiticides listed at 205.603(a) of the National List.

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 whole of the subcommittee's proposal to modify the annotations and expand use of synthetic parasiticides in organic livestock production. The proposal includes well-justified reasoning for the proposed annotation changes, and OTA supports the clarity and transparency with which the Livestock Subcommittee approached this issue and developed its recommendations. Adjustments to withholding times, more sensible requirements around which types of parasites justify use, and acknowledging that veterinarian orders are not necessary for ensuring judicious use of these products show the subcommittee's commitment to making these tools available to producers for emergency situations only.

We are particularly pleased to see the recommendation would allow the use of parasiticides on wool-bearing sheep, as we have heard from our membership the lack of a domestic organic wool market is due, in large part, to the occasional need to treat ewes with parasiticides, which currently renders their wool ineligible for organic labeling.

OTA also acknowledges that reduction of withholding times will, invariably, eliminate a disincentive for the use of these materials. Therefore, we suggest that producers and Accredited Certifying Agents (ACAs) take steps to ensure that the emergency situation that prompted the use of parasiticides be thoroughly documented in organic systems plans and inspection reports.

We offer the following, more detailed, comments:

### **Withholding Times & Use Restrictions**

We agree with the subcommittee's revisions to the withholding times and use restrictions for Fenbendazole and Moxidectin. These substances are preferred parasiticides to Ivermectin, and unnecessarily long withholding times reduced the likelihood that a producer would choose these options when faced with an emergency situation. Similarly, the use restrictions associated with these parasiticides are not clear (Moxidectin – for control of internal parasites only) and are not necessary (Fenbendazole – only for use by or on the lawful written order of a licensed veterinarian). These use restrictions further discourage producers from choosing these options when treating livestock on an emergency basis. These barriers have discouraged the use of Moxidectin and Fenbendazole, and, as a result, producers are not yet confident in their efficacy in managing for parasites. By eliminating the unclear and unnecessary use pattern restrictions and reducing withholding times, producers may now look to these options which are less harmful to the environment, and which may set the stage for the removal of Ivermectin in the future.

### **Fiber-bearing Animals**

Organic lamb and wool production in the U.S. have failed to keep up with the demand for these products. There are a number of production obstacles responsible for this including the price organic sheep farmers are able to get for their flocks' wool. By expanding the allowance for parasiticides to be used in emergency situations on fiber-bearing animals (with a 90-day withholding timeline), producers can treat their sick ewes without jeopardizing the organic status of the animals' wool. This will have beneficial effects on the industry in two ways:

1. Maintaining comingling prevention between the wool shorn from organic ewes that have and have not been treated with parasiticides poses a significant-enough barrier to deter many sheep producers from developing an organic wool market outlet. Eliminating this barrier will enable producers to have a steadier, predictable supply of wool to satisfy their customers.
2. Developing an organic wool market will further incentivize the conversion of sheep flocks to organic production because there will now be a market for both sheep products typically produced by shepherds: meat and wool. There is already a market hungry for additional organic lamb supplies, and enabling producers to access an organic wool market will greatly bolster the bottom line of these operations.

### **Ensuring Continued Judicious Use**

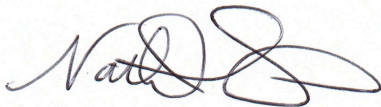
Despite the well-documented and supported reasoning behind the annotation changes and expansion to fiber-bearing animals for synthetic parasiticides, we do recognize that by reducing the withholding times, producers will have less of a disincentive to use these substances on their flocks and herds when faced with an emergency situation. The strength of the restriction on parasiticides lies with this requirement that they are only used in emergency situations, and we want to ensure that restriction remains strong. Therefore, we encourage NOSB to consider additional guidelines they can provide to operators and ACAs to properly identify and document emergency situations, so that the changes to annotations and use of parasiticides proposed by the Livestock Subcommittee do not result in routine use of these substances.

**Conclusion**

In summary, OTA supports the work and recommendation of the Livestock Subcommittee and urges the full Board to pass this recommendation. The changes to annotations and expansion to fiber-bearing animals will benefit producers, their livestock, and the organic industry at large. We appreciate the transparency and deliberate nature of the Livestock Subcommittee's recommendation, so that stakeholders can be sure that the thought process of the subcommittee was in line with organic principles and acknowledged real production concerns that organic producers face. We are particularly supportive of the expansion in use of parasiticides to fiber-bearing animals, and anticipate that the organic lamb and wool market will expand as a result of this change without reducing organic consumers' trust and confidence in the organic label. Lastly, we encourage thoughtful discussion around ensuring that producers and ACAs remain steadfast in their evaluation and documentation of the emergency situations that justify the use of these substances.

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