



# 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-18-0029-0001

Re: Livestock Subcommittee: 2020 Sunset Reviews

October 4, 2018

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the 2020 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,

A handwritten signature in black ink, appearing to read "Peter Nell".

Peter Nell  
Policy Specialist

cc: Cathy Calfo, Executive Director/CEO  
Kelly Damewood, Director of Policy and Government Affairs  
Jake Lewin, President, CCOF Certification Services, LLC

## CCOF's Comments on the 2020 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) – Synthetics Allowed in Organic Livestock Production

#### *Alcohols – ethanol, isopropanol*

24 CCOF members list isopropanol alcohol on their OSP. Alcohols are commonly used for antiseptic purposes and are integral for preventing infection and the spread of pathogens while cleaning wounds. Currently, no CCOF member lists ethanol on their OSP.

#### *Aspirin*

43 CCOF members list aspirin on their OSP. Aspirin is a mild anti-inflammatory and painkiller used to maintain livestock health.

#### *Biologics – vaccines*

140 CCOF members list vaccines on their OSP. Vaccines are the most commonly used preventative healthcare tool for protecting animals from bacterial and viral infections.

#### *Electrolytes*

97 CCOF members list electrolytes on their OSP. Electrolytes are used when animals are already in poor health, such as correcting imbalances in chicks and young animals. Dairies also use electrolytes to treat milk fever, a serious condition which can lead to trembling, listlessness, and death if left untreated.

#### *Glycerin*

38 CCOF members list glycerin on their OSP. Glycerin is an ingredient in teat dips to prevent skin conditions and as a topical skin treatment. CCOF members often list multiple teat dip substances on their OSP as backup measures when alternatives are ineffective.

#### *Phosphoric acid*

4 CCOF members list phosphoric acid on their OSP. Phosphoric acid is used by dairy operations to clean and flush buildup in milking systems and dairy pipelines. The substance is only allowed as equipment cleaner and cannot have direct contact with organic livestock. CCOF is not aware of new natural alternatives to phosphoric acid.

#### *Lime, hydrated*

11 CCOF members list hydrated lime on their OSP. Hydrated lime is used as an external pest control to manage lice, mites, and other pests. Organic producers are prohibited from using hydrated lime for deodorizing animal waste. External pest control substances are important tools to protect animals and prevent the spread of pests among herds. CCOF is not aware of natural alternatives to hydrated lime.

#### *Mineral oil*

20 CCOF members list mineral oil on their OSP. Mineral oil is used as a lubricant and can also be used topically as an external parasiticide.