



CCOF

Organic Certification

Education & Outreach

Political Advocacy

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: 2019 Sunset Reviews

March 30, 2017

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the 2019 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 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 emergency 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.

Additionally, in our comments we describe how the substance is used and 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 throughout the nation.

Thank you for your careful review of our comments. Please contact me if you would like further information.

Sincerely,

Kelly Damewood
Director of Policy and Government Affairs

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

CCOF's Comments on the 2019 Sunset Review Livestock Scope Materials

The following comments are based on 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

Chlorine materials – calcium hypochlorite, chlorine dioxide, sodium hypochlorite

The majority of CCOF members use chlorine materials, including bleach and bleach products. Chlorines are widely used in a variety of situations such as to clean areas where animals are kept or to sanitize tools and equipment. Chlorine dioxide is often used by our poultry producers to kill and remove algae buildup in water lines to maintain water quality.

Chlorhexidine

20 CCOF dairies use chlorhexidine. Chlorhexidine has two uses: as a teat dip and as a disinfectant used by veterinarians during surgical procedures. CCOF members primarily use chlorhexidine as a critical backup measure when alternative teat dips, such as iodine, prove to be ineffective.

Glucose

One CCOF member lists a glucose product on their OSP. Glucose is used to treat ketosis or hypoglycemia in animals. While typically CCOF's members' animals do not develop those ailments, access to treatment should be available to those who need it. Natural alternatives such as molasses are available.

Oxytocin

38 CCOF members list oxytocin on their OSPs. Oxytocin is a hormone that has a limited but critical use because it helps animals post-partum. Oxytocin can help the animal clear placenta when it is experiencing uterine issues after giving birth. Oxytocin is a vital tool to assist animals after birth.

Tolazoline

No CCOF member has tolazoline listed on their OSP. Tolazoline has a limited use—it is only allowed in organic production to counteract xylazine. Xylazine is a sedative and anesthetic that is only allowed in emergency treatments by veterinarians. The use of xylazine, and therefore tolazoline, would be rare for CCOF members.

§ 205.603(b) – Synthetics Allowed in Organic Livestock Production

Copper sulfate

38 CCOF members list copper sulfate on their OSP. Copper sulfate is a critical piece of an animal healthcare regime. It is a common topical treatment for animals that are experiencing hoof and foot issues. CCOF has seen no evidence of the use of copper sulfate footbaths and sprays leading to the accumulation of copper in the environment. Notably, livestock producers use copper sulfate as sparingly as possible because copper materials are costly and subject to environmental and water regulations.

Lidocaine, procaine

20 CCOF members list lidocaine on their OSPs and none list procaine. Both lidocaine and procaine are local anesthetics. Lidocaine is a quick acting anesthetic, which is used in a variety of situations where an animal might feel discomfort or pain. For example, our members use lidocaine when castrating animals and for other medical procedures.