



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-16-0049

Re: Livestock Subcommittee: Proposal to Remove Ivermectin (CAS # 70288-86-7) from the National List

October 25, 2016

Dear Ms. Arsenault and NOSB Members,

CCOF (California Certified Organic Farmers) thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the Livestock Subcommittee's proposal to remove ivermectin from the National List.

CCOF is a nonprofit organization founded in 1973 that advances organic agriculture for a healthy world through organic certification, education, advocacy, and promotion. CCOF is based in Santa Cruz, California, and represents more than 3,000 certified organic members in 42 states and three countries.

For the fall 2015 meeting, CCOF submitted comments that explained that livestock producers use ivermectin as a last-resort, emergency treatment only when preventive management has not succeeded in protecting an animal from parasite infestation. The petition notes concern about ivermectin's impact on dung beetle populations, which was a concern also raised at the fall 2015 meeting. However ivermectin is not used routinely; its rare use for emergency situations should not threaten dung beetles.

Thank you for considering our input. Please contact us if you would like further information or clarifications.

Sincerely,

Handwritten signature of Cathy Calfo in black ink.

Cathy Calfo, Executive Director/CEO

Handwritten signature of Jake Lewin in black ink.

Jake Lewin, President, CCOF Certification Services LLC