



# CCOF

Organic Certification

Education & Outreach

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Promotion

Ms. Michelle Arsenault  
Advisory Committee Specialist  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave. SW.  
Room 2642-So., Mail Stop 0268  
Washington, DC 20250-0268

**Docket: AMS-NOP-15-0037; NOP-15-11**

**Re: Livestock Subcommittee Discussion Document: Annotation Change for Parasiticides; and Sunset 2017 Review of Ivermectin and Moxidectin**

October 7, 2015

Dear Ms. Arsenault and NOSB:

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the agenda items concerning parasiticides. CCOF advances organic agriculture for a healthy world through organic certification, education, advocacy, and promotion. Founded in 1973, CCOF certifies more than 3,000 certified operations in 41 states and three countries, covering 2.1 million acres of productive farmland.

**Discussion Document: Annotation Change for Parasiticides in Livestock Production**

CCOF offers these responses to the questions posed by the Livestock Subcommittee.

1. *Should the milk withholding period be modified for any or all of the parasiticides? If so, how many days for Moxidectin, Fenbenzadole and Ivermectin?*

Yes, the milk withholding period could be modified because the 90-day withholding period is an arbitrary length of time. Use of parasiticide in organic production is already more stringent than use in conventional production because organic standards do not allow for routine use of parasiticides. CCOF rarely sees synthetic parasiticides used in organic dairy production, and when they are used, they are generally used on heifers, not on milking animals.

2. *Should minimal use of parasiticides be allowed in organic slaughter stock such as is permitted under Canadian Organic standards with one treatment for slaughter animals under one year old and two treatments for older animals (requiring more treatments will lose organic status)?*

No. Tracking treatments to the extent described above is not feasible; producers already struggle to track treated animals. However, CCOF supports restricting parasiticide use to only rare occasions because it will encourage development of non-synthetic alternatives.

3. *Should sheep fleece and wool be allowed to be certified organic even if use of parasiticides was necessary at some time in the animal's life?*

Yes. CCOF supports fiber being treated differently than slaughter or milk products.

4. *Should use of moxidectin be changed to allow both internal and external use?*

Yes. CCOF supports amending the annotation to allow both internal and external use. The branded products that contain moxidectin are for both internal and external use. The annotation that states moxidectin is “for control of external parasites only” is confusing to organic producers and sometimes difficult to enforce.

5. *Should use of parasiticides be allowed only under veterinarian advice?*

Overall, CCOF supports an annotation update that requires veterinarian advice because it would clarify how producers should document the emergency necessity for treatment and provide for a clear audit. Currently, parasiticides are “allowed for emergency treatment,” which requires that organic producers describe and provide documentation about how they determined that it was an emergency (fecal tests, animal condition, etc). Notably, although a vet recommendation requirement would be more straightforward to document and audit than the existing annotation, situations also exist when a veterinarian may not be available to assess the situation quickly, such as when animals are in a remote location.

#### **Sunset 2017 Review of Ivermectin and Moxidectin**

Ivermectin and moxidectin are allowed for use by certified organic livestock producers for emergency treatment when preventive management does not prevent parasite infestation. CCOF members do not commonly use these highly restricted materials. However, ivermectin is listed on 53 livestock organic system plans and moxidectin on 25 organic system plans because they are important back-up tools for livestock producers when they need to manage for parasites. CCOF members who produce livestock report that very few natural alternative parasiticides exist. And the few natural alternatives that exist are not effective. Table 10 of the *2015 Technical Evaluation Report for Parasiticides: Fenbendazole, Ivermectin, Moxidectin* lists botanical and alternative de-wormers. However, the list recommendations listed are not yet commercially available to organic livestock producers. CCOF strongly supports development of effective natural parasite treatments and would like to see more research in this area.



Some comments express concern that ivermectin has toxic effects on dung beetle larvae. However, these products are not used on a routine basis and the impact of rare and occasional usage in organic production is low. Moreover, organic livestock producers have management systems in place to prevent parasite infestation such as rotational grazing systems. Producers only use ivermectin or moxidectin when preventive measures are not effective and an animal's health is at risk.

If ivermectin and/or moxidectin are removed from the National List, organic livestock producers will only have fenbendazole when they have a critical need to improve animal health. Fenbendazole is limited in its effectiveness because it treats a few specific types of parasites. Moreover, if organic producers only have one type of parasiticide, such as fenbendazole, then the likelihood of parasites developing resistance to the material greatly increases.

In sum, continued use of ivermectin and moxidectin is necessary in organic livestock production until natural alternatives become commercially available. Organic livestock producers need access to a range of effective healthcare tools to ensure the health and wellbeing of their animals.

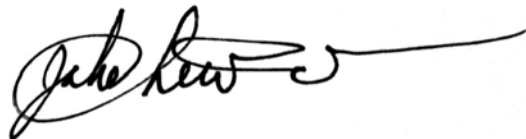
For reference, attached is the comment on livestock materials that CCOF submitted for the spring 2015 NOSB meeting, which includes CCOF's input on other materials undergoing sunset review for 2017.

Thank you for taking the time to review this material. Please contact us for further information or clarifications.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC





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**Docket: AMS-NOP-15-0002**

**Re: NOSB Livestock Subcommittee, Sunset 2017 Review Summary**

April 7, 2015

Dear Ms. Arsenault and NOSB:

Thank you for the opportunity to comment on the sunset 2017 livestock materials. CCOF has no specific recommendations to remove sunset 2017 livestock materials from the National List. CCOF recommends that the materials listed below remain on the National List. We provide additional information on certain materials to the best of our ability as requested by the subcommittee:

**Isopropanol** CCOF members often use a generic version of this product. It is most commonly used for antiseptic purposes and is integral for preventing infection (e.g. cleaning wounds).

**Aspirin** This mild anti-inflammatory and painkiller is a useful tool for maintaining livestock health.

**Chlorhexidine** This material is a back-up for cases when iodine teat dips have become ineffective. It is more commonly listed on an organic system plan than it is actually used.

**Flunixin** This material is commonly used for pain relief. Few equivalent non-synthetic alternatives exist. Aspirin may or may not be sufficient to manage pain as effectively.

**Hydrogen peroxide** Most CCOF-certified livestock producers use a generic version of hydrogen peroxide as a disinfectant in livestock healthcare (primarily dairies). Soap and water diluted iodine can be used as an alternative.

**Iodine** This is a very common ingredient in teat dips and is often used for general healthcare practices when something needs to be disinfected (e.g. navel after calf is born). CCOF members who have livestock operations rely upon this material for the health and well-being of their animals.



**Oxytocin** This material is used for post-parturition milk letdown and uterine issues in organic dairy production.

**Parasiticides: Ivermectin and Moxidectin** It is very important to control both internal and external parasites because jeopardize the overall animal health. Viable alternatives to these synthetic options are not readily available and can be difficult to acquire. The use of fenbendazole is much less common. Ivermectin is quite common in organic production; however, its effectiveness may prevent livestock producers from seeking non-synthetic alternatives. Ideally, pasture management can prevent most parasite infestations, but having these emergency use options is helpful when the parasite load is too high to control.

**Copper sulfate** This material is used most frequently as a topical application to control and prevent foot rot issues. Copper sulfate is a common industry practice and seems to be effective. Hydrogen peroxide and magnesium sulfate are also used for this purpose but as often. There are concerns (as noted in zinc sulfate proposal) that copper sulfate footbaths can lead to accumulation of copper in the environment; however, we have not seen evidence of this. If zinc sulfate is approved there is also risk that it will lead to an accumulation of zinc in the environment. The proposal to add zinc sulfate notes that copper sulfate can be toxic to sheep but hoof rot is generally not a problem for our members who raise sheep; rather, hoof rot tends to be a dairy or beef cattle issue. If zinc sulfate is added, we would not anticipate a change in products.

**Excipients** The present annotation is not clear. It allows for almost anything to be allowed as an excipient, but materials reviewers have to research using multiple databases (CFR Code of federal regulations title 21, GRAS database, EAFUS database, etc.) to gather that information. A clear annotation should state which specific excipients, if any, would not be allowed. Synthetic excipients are in almost every livestock healthcare product. Information on them is very difficult to obtain from manufacturers in certain cases like teat dips.

**Trace minerals** These are found in many feed supplements and are important in maintaining animal health.

**Vitamins** Vitamins are most commonly used in mineral supplements. Non-synthetic versions seem to be difficult to obtain. Providing vitamin and mineral supplements to livestock are an integral part of a preventative healthcare management system.

CCOF thanks you for the opportunity to comment on these materials and for the subcommittee's work to maintain organic integrity. We are available to answer any questions and provide further clarification.



Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, Certification Services LLC

*CCOF is a nonprofit organization founded in 1973. CCOF serves as a trade association for more than 2,900 certified organic producers in 42 of the United States and three countries.*

