



# CCOF

Organic Certification

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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-17-0057-0001

Re: Livestock Subcommittee: Clarifying “Emergency” for Use of Synthetic Parasiticides in Organic Livestock Production Proposal

April 4, 2018

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Livestock Subcommittee’s proposal “Clarifying ‘emergency’ for use of synthetic parasiticides in organic livestock production.” CCOF certifies over 200 livestock producers and supports the proposal.

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.

CCOF supports the proposal because it clearly defines “emergency” for livestock treatment of parasites in breeding, dairy, and fiber bearing animals. The definition explicitly gives context so that there are no unintended effects of defining “emergency.”

The proposal provides clear and strong language that is not overly prescriptive to livestock producers. CCOF supported the fall 2017 proposal to clarify “emergency” because it recommended adding necessary language to the organic livestock health care practice standards that limits the use of synthetic parasiticides. The routine use of synthetic parasiticides should not be allowed in organic livestock production. The current proposal sets forth clear preventative practices and accomplishes the same goal with less prescriptive language and a logical definition.

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

Sincerely,

A handwritten signature in black ink that reads 'Kelly Damewood'.

Kelly Damewood  
Director of Policy and Government Affairs

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