



March 30, 2017

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National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW.,
Room 2642-S., Mail Stop 0268
Washington, DC 20250-0268

Submitted via www.regulations.gov

RE: Docket: AMS-NOP-16-0100 NOP-16-11

NOSB Livestock Subcommittee Discussion Document: Clarifying “emergency” for use of synthetic parasiticides in organic livestock production

Dear NOSB members:

Thank you for the opportunity to provide comments on the Discussion Document: Clarifying “emergency” for use of synthetic parasiticides in organic livestock production. MOSA certifies approximately 2000 organic operations throughout the United States, including almost 900 livestock operations. Parasite prevention and treatment plans are in place on all operations we certify. While the use of parasiticides is not prevalent, we do deal with farmers needing to use materials in the event of parasite outbreaks. We would benefit from a definition of “emergency”.

We do not support rule changes in Section 205.238 of the National Organic Standards as pertaining to parasite prevention plans and use of approved synthetic parasiticides. We feel the new Organic Livestock and Poultry Practices final rule adequately revised 205.238, by adding, *“(d) Organic livestock operations must have comprehensive plans to minimize internal parasite problems in livestock. The plan will include preventive measures such as pasture management, fecal monitoring, and emergency measures in the event of a parasite outbreak. Parasite control plans shall be approved by the certifying agent.”* However, we would support a new definition defining *emergency*. Routine use of parasiticides is defined and it’s logical that *emergency* would also have a definition. The term *emergency* is used in the National List related to three different materials: Parasiticides, Poloxalene, and Xylazine.

The NOSB asked for input on four questions and our brief answers are below. We would appreciate additional time to further consider this topic.

1. Does the term “emergency” need to be defined?

We believe that a definition, with examples, would be helpful.

2. If so, how should the term “emergency” be defined?

Routine use of parasiticide is defined as, *“The regular, planned, or periodic use of parasiticides.”* Emergency use could be defined as, *“A sudden, irregular or unexpected situation that requires urgent attention.”* The definition should not specifically refer to parasiticide use, since the term is used in annotations for the use of other materials also. In

addition to a definition, examples related to organic livestock management would be helpful. What types of situations qualify as an emergency?

3. Should there be more specific guidelines, such as specific tests for parasite levels as part of the producer's parasite prevention plan, before it is determined that emergency treatment with an approved parasiticide might be needed?

It is clear that the NOP intended additional attention be given to emergency plans for parasite control as noted in recent revisions to the livestock standards. We are revising our organic system plan to better capture the parasite prevention plans and the emergency measures in place in the event of an outbreak. We are also inquiring *why* such an outbreak may occur on the operation. Our intention is to better assess the plans for prevention already in place, why emergency situations may arise, and to verify active compliance with restrictions on inputs. A better understanding of situations that would constitute an emergency would help with verification, but regardless, with the new livestock rule, certifiers should have a better handle overall on parasite prevention and treatment on the farm. The NOSB asked if there should be more specific guidelines such as parasite level tests. We believe that the new NOS 205.238(d) gives attention to that need. Measures such as pasture management and fecal monitoring should be in place as preventative strategies. It would seem overly restrictive, and harmful to animals' well being, to go so far as to require specific parasite loads prior to treatment.

We also hear the general concern regarding any parasiticide use. With the reduced withholding periods also proposed, we could potentially see increased parasiticide use. Holding milk from sale for 90 days is a significant decision on farms, but the two days proposed for Moxidectin and Fenbendazole use would not impose such an inconvenience. Defining emergency and providing examples would help certifier consistency.

4. What are the challenges for producers, inspectors and certifiers in verifying the documentation and implementation of a parasite management plan in organic operations, and how might these be addressed?

With the new livestock rule, we believe better attention will be given to parasite prevention plans.

In closing, the NOSB stated: *"This discussion document is intended to seek public comment from a broad cross section of stakeholders to determine if any changes should be made to Section 205.238, Livestock Healthcare Practice Standard as it pertains to parasite prevention plans and use of approved synthetic parasiticides, and if clarification of the term "emergency" is needed."* Due to the short timeframe for public comments, we encourage continuing the discussion at the Fall meeting to allow for adequate time for consideration. Thank you for your work on this challenging and perhaps precedent-setting issue.

Respectfully submitted,

The MOSA Certification Team