



April 3, 2020

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National Organic Standards Board
USDA-AMS-NOP
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Submitted via [Regulations.gov](https://www.regulations.gov).

RE: Docket # AMS-NOP-19-0095

NOSB Livestock Subcommittee [Discussion Document: Fenbendazole](#)

Dear NOSB members:

Thank you for the opportunity to provide comments on the Discussion Document for the addition of Fenbendazole to the National List. MOSA certifies approximately 2,155 organic operations throughout the United States, including approximately 825 livestock operations, about 200 of those with laying chickens.

We appreciate the discussion surrounding the petitioned use of fenbendazole in poultry production as parasiticide for laying hens and pullets. This addition would allow for the use of fenbendazole in laying hens and pullets without a withdrawal period for eggs. MOSA's responses to three of the Livestock Subcommittees questions are below:

1. Is fenbendazole needed by organic poultry producers? If so, why?

We have only had a *very few* requests in the past several years from producers for the use of a synthetic parasiticide in their poultry production. We'd expect that the requests received came at a time of emergency. The request for use of a synthetic parasiticide has not been common among MOSA certified organic poultry producers. In addition to our comments based on our experience, we checked in with a few stakeholders and received different messages. One stated that a parasiticide would be nice to have in the toolbox in the case of an emergency when preventative measures had failed. And, another poultry group manager felt that fenbendazole should not be added to the National List, stating that a synthetic should not be added as a rescue for poor management. We encourage you to continue solicitation of comments from producers and handlers until you've received substantial feedback from them.

In any case, a withhold time would discourage any use of a parasiticide on the flock and ensure its use in only extreme cases. Anecdotally, one day of lost egg production could be manageable, but two to three would be too big of a burden for most farmers to bear.

2. Do currently allowed alternatives work to control internal parasites? At what level of effectiveness?

We did talk to MOSA certified egg producers and handlers who all noted that preventative measures are imperative for effective organic poultry management. Typical preventative measures include pasture management and rotation, DE dusting, and DE in feed. Flocks known to have parasites look unthrifty, so if the preventative measures are not effective, it's apparent. One client noted, "worms aren't a big issue until they are." Right now, if farmers' preventative measures are not effective and parasites become a problem, then there are not any avenues other than to continue production with the infected flock, potentially creating an animal welfare issue, loss of income and a host of other issues. Preventative management is the key takeaway message we heard from our clients.

3. What would be some of the "emergency" events that would trigger use of this product? And how would producers determine those events?

We agreed with the NOSB's 2018 spring proposal for clarifying "emergency" for use of synthetic parasiticides in organic livestock, which included a definition for emergency and some additional insight into thinking around this question. We think scenarios of emergent situations for all livestock would be helpful. If fenbendazole is recommended for addition, this definition will need to include poultry.

"Emergency (treatment for parasite control in breeding, dairy and fiber bearing animals). An urgent, nonroutine situation in which the organic system plan's preventive measures and veterinary biologics are proven, by laboratory analysis or visual inspection, to be inadequate to prevent life-threatening illness or to alleviate pain and suffering."

We understand that emergencies are urgent, nonroutine, and exist when all other measures have been exhausted. In livestock, use of any input can be administered on an individual basis, but for poultry, most treatments are administered to the entire flock. We request guidance on situations that would lead up to the need for whole flock treatment. In our 2018 comments, we requested the same guidance for other species of livestock. Certifiers appreciate examples as a part of guidance.

With this suggestion and with other recent changes the use of parasiticides will need to be closely monitored on organic operations. Parasite control plans and management strategies will need to be reviewed and approved, and each emergency situation reviewed and approved. With little or no withholding period for milk, meat, or eggs, we expect to continue to see the use of parasiticides increase. Additional guidance would be helpful, and we thank the NOSB for their previous work on this topic. We encourage the NOP to move forward with their action on the 2018 NOSB recommendation.

Thank you for your work on this topic. We are available to answer any questions you may have.

Respectfully submitted,

The MOSA Certification Team