



April 4, 2019

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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: Document # AMS-NOP-18-0071

NOSB Materials Subcommittee Excluded Methods Discussion Document - Induced Mutagenesis and Embryo Transfer in Livestock, February, 12, 2019

Dear NOSB members:

Thank you for the opportunity to provide comments on the excluded methods discussion document. MOSA certifies approximately 2150 organic operations throughout the United States, including approximately 870 livestock operations. We would like to comment on embryo transfer.

MOSA allows embryo transfer; with conditions. We have required that the recipient organic animal does not receive hormones or other prohibited inputs to enable the transfer. For dairy animals, in order for the recipient to continue to produce organic milk, she has to be managed organically. Breeder animals, if NOT certified for organic milk production, may use conventional practices and material inputs, so long as organic management is used for the last third of gestation.

Below are our answers to the embryo transfer questions in the discussion document.

1. Should the use of hormones to stimulate egg production be allowed in donor animals?

If prohibited hormones are used, then the donor animals are not considered to be organic. However, in accordance with National Organic Standards section 205.236 (a)(3), we've allowed breeder stock to transition in and out of organic production. If breeder stock are not under organic management, then prohibited inputs can be used. To not allow hormones would be inconsistent with the general allowance for other prohibited materials in breeder stock that are not managed organically.

2. Should the use of hormones to synchronize estrus in animals who will receive the embryo be allowed?

No. Prohibited inputs are NOT allowed for the recipient organic animal. (But again, if the animal were a breeder stock and removed from organic management during the procedure, use of prohibited inputs is outside of our purview.)

3. Are there concerns for the health of the adult animal or their offspring after the use or repeated use of these hormones?

We are uncertain whether this question applies to the donor animal or the recipient animal, or both. For nonorganically-managed breeder stock, we do not assess health concerns related to use of other prohibited inputs. It's a friendly consideration, but does not seem to be within our purview. We are not aware of any health concerns related to hormone use for embryo transfer.

4. Could the approval of this technology have any unintended consequences, such as the narrowing of the gene pool, due to widespread use of embryos from a narrow pool of egg and sperm donors in organic production?

This is a plausible concern, but we're not certain of an answer. We would note that artificial insemination, which is allowed in organic production, may cause similar concerns. An alternative viewpoint could consider that embryo transfer may be a tool to help organic farms to *widen* their gene pool.

5. Is embryo transfer a necessary method for organic livestock production?

We don't have very many certified organic clients that use this practice, so we cannot speak to its necessity.

Thank you for your continued work on the challenges of defining where we draw boundaries on what types of methods should be excluded from organic production systems. Clear excluded methods definitions are helpful to our complex regulatory work.

Respectfully submitted,

The MOSA Certification Team