

April 4, 2018

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independent Ave., SW  
Room 2648-S, Mail Stop 0268  
Washington, D.C. 20250-0268

***Re: Meeting of the National Organic Standards Board***

*Docket # AMS-NOP-17-0057*

Dear National Organic Standards Board Members:

The following comments are submitted to you on behalf of The Cornucopia Institute, whose mission is to support economic justice for family-scale farming.

### **LIVESTOCK SUBCOMMITTEE**

#### **Proposal: Clarifying Emergency Use of Parasiticides Proposal**

#### **COMMENT**

Parasiticides are substances used in veterinary medicine to kill parasites. In general, organic practices such as pasture rotation, breed selection, and allowed alternative treatments (e.g., essential oils and diatomaceous earth) provide acceptable management of parasites on organic farms. Often, a low-level parasite load is tolerated and not harmful to the livestock or economically disadvantageous. However, sometimes parasite loads cannot be adequately treated through common management practices, and producers must resort to one of the allowed synthetic parasiticides to protect the welfare of the animal(s) or flock affected.

Currently, some parasiticides fall under §205.603 for synthetic substances allowed for use in organic livestock production.

The short wait time between the use of allowed synthetic parasiticides and the sale of organic livestock products indicated in the January 2018 NOP proposed rule (83 FR 2498, January 17, 2018) should *only* be permitted when there is a documented need for an emergency treatment. We believe the Livestock Subcommittee (LS) agrees on this point.

Due to the shortened wait times, it is also essential that the term “emergency” be defined. The Cornucopia Institute is happy to see that the LS has proposed both a definition for emergency and additions to §205.238(b) that confirm management plans must not default to the use of synthetic parasiticides.

***The Cornucopia Institute supports both the LS's proposed definition to be added to § 205.2 and the proposed addition to §205.238(b).*** It is helpful that the §205.238(b) addition defines the context in terms of the farm's Organic System Plan (OSP), as long as the OSP does not default to the use of emergency parasiticides in every circumstance. We feel that the language speaking to "management strategies" in the §205.238(b) addition will also help to prevent the routine use of synthetic parasiticides.

We also support the requirement that OSPs be altered to prevent similar livestock emergencies after an allowed emergency use, as it will require producers to adapt their management strategies to their farm's needs. The philosophy behind the organic label embodies improving the land, and practices, and this requirement speaks to that directly.

We agree with the LS that the organic standards should not encourage "certifier shopping" (i.e., seeking out those certifiers who interpret the rules more loosely than others). Defining "emergency" with respect to the use of parasiticides is an important part of avoiding the creation of grey areas in the rule that might otherwise lead to inconsistencies in enforcement, where some certifiers apply a more liberal standard than others.

Thank you for your consideration of these comments.