Northeast Organic Dairy Producers Alliance

NODPA

October 8, 2015

Ms. Michelle Arsenault, Advisory Committee Specialist,
National Organic Standards Board,
USDA-AMS-NOP,
1400 Independence Ave. SW., Room 2642-So.,
Mail Stop 0268, Washington, DC 20250-0268

Dear Michelle Arsenault

NODPA is the largest organic dairy producer organization in the country with a membership of eight hundred and thirty six organic dairy producers in the Eastern US. NODPA's mission is to "**enable organic dairy family farmers, situated across an extensive area, to have informed discussion about matters critical to the well being of the organic dairy industry as a whole**." NODPA is not aligned with any one processor or cooperative and therefore is able to represent the views and needs of many different farmers.

NODPA is a member of the National Organic Coalition (NOC), comprised of consumer organizations, organic farmers, organic food companies, and organic certifiers. The goal of the coalition is to assure that organic integrity is maintained, that consumers confidence is preserved and that policies are fair, equitable and encourage diversity of participation and access.

NODPA is presenting written comments on Parasiticides, Procaine, Mineral Oil and Lidocaine. NODPA also supports the comments presented by the National Organic Coalition including their position on hydroponic systems, "Until a clear definition and guidelines based on the 2010 NOSB recommendation have been provided by the NOP, certifiers should not be allowed to certify hydroponic systems. Certifiers need to be directed as to which soilless systems may be certified, and which do not meet the criteria and are not eligible for organic certification. NOC urges the NOP to write "NOP Instruction to Certifiers" that leads to Rulemaking. The instruction should include clear criteria that follow the NOSB 2010 recommendation, and adhere to the definition of organic production presented in the Rule."

NODPA's Mission

To enable organic dairy family farmers, situated across an extensive area, to have informed discussion about matters critical to the well-being of the organic dairy industry as a whole.

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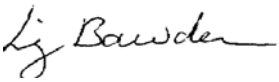
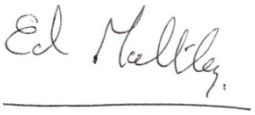
Please contact Ed Maltby if you require any more information.

Sincerely



NODPA Board Chair and New York organic dairy farmer



NODPA Executive Director

Comments on synthetics allowed in organic livestock production

Current Listing: (18) Parasiticides – Prohibited in slaughter stock, **allowed in emergency treatment for dairy and breeder stock when organic system plan-approved preventative management does not prevent infestation.** Milk or milk products from treated animal cannot be labeled as provided for in subpart D of this part for 90 days following treatment. In breeder stock, treatment cannot occur during the last third of gestation if the progeny will be sold as organic and must not be used during the lactation period for breeding stock.

(i) Fenbendazole (CAS #43210-67-9) – only for use by or on the lawful written order of a licensed veterinarian.

(ii) Ivermectin (CAS #70288-86-7).

(iii) Moxidectin (CAS #113507-06-5) – for control of internal parasites only.

NODPA recommends the following changes in bold and strikethrough:

Current Listing: (18) Parasiticides – Prohibited in slaughter stock, allowed in emergency treatment for dairy and breeder stock when organic system plan-approved preventative management does not prevent infestation. Milk or milk products from treated **milking cows** ~~animal~~ cannot be labeled as provided for in subpart D of this part for ~~90~~ **5** days following treatment. In breeder stock, treatment cannot occur during the last third of gestation if the progeny will be sold as organic and must not be used during the lactation period for breeding stock. **The use of any parasiticides should be done under the recommendation and guidance of a veterinarian after obtaining fecal samples**.

(i) Fenbenzadole (CAS #43210-67-9) ~~– only for use by or on the lawful written order of a licensed veterinarian.~~

(ii) ~~**Ivermectin (CAS #70288-86-7).**~~ **Remove Ivermectin**

(iii) Moxidectin (CAS #113507-06-5) – ~~for control of internal parasites only~~.

The current listing allows the use of the parasiticides in animals not for slaughter as an emergency provision only and not as a regular treatment. A healthy animal can resist a worm infestation because their system resources are strong and can fight the worms and the worms cannot get a foothold. It is when the animal is poorly managed, or under some sort of stress (which contributes to illness and disease) that the worms get a foothold and cause an infestation. This is where herbal remedies differ from chemical ones. Herbs work with the body, to build and strengthen system resources, and so the body is strong and can resist and fight disease. Herbal wormers not only expel worms, but they also strengthen the body so that worms cannot get a foothold. The control of worms is part of the whole herd health that organic livestock producers should practice. Certifiers should enforce the use of parasiticides for emergency use only and ensure that the organic system plan is changed to prevent further use in future years.

The dairy industry does need some tools to deal with a heavy infestation of parasites and does need different options for a variety of environments and resistance to different chemicals, for example if a whole herd was infected with lung worm that approved products were not able to remove, the ability to use a parasiticides in an emergency to save the herd should be available. Within the organic dairy industry the use of parasiticides is very rare because of preventative measures and grazing management. Young livestock are the biggest challenge when it comes to controlling stomach worms but good grazing management and attention to appropriate rations for the stage of growth reduce the incidence of any infestation. The control of stomach worms in milking goats and sheep is more difficult and does present continuous challenges in prevention and treatment with management of grazing, rations, housing and use of approved products. None of these three parasiticides are recommended for use on dairy goats and sheep and as such there are no approved withdrawal times. Any use would be under the control of a licensed veterinarian as an extra label use.

The original intent of the NOSB when they allowed Fenbendazole to be used was to replace Ivermectin which is clearly shown in the transcripts of that meeting. Ivermectin can be toxic to dung beetles, which are an integral part of pastureland ecology. Removing Ivermectin honors the intent of previous NOSB recommendations while still allowing producers the option of using two parasiticides. Producers do have the option of using other parasiticides but must remove the dairy animals from organic production.

Moxidectin can be used to destroy heavy infestations of lice, horn flies, cattle grubs and mange mites whereas as Fenbendazole does not. Ivermectin is used to control these external parasites so

in order to give producers the tools to control external parasites without being able to use Ivermectin, we recommend that the restriction for using it only for internal parasites be removed.

Neither Fenbendazole nor Moxidectin have withdrawal times for their use in lactating dairy cows. NODPA's recommended withdrawal time of 5 days has no scientific basis as all the science investigations support no withdrawal time so 5 days is precautionary and an indication that the use of parasiticides is an emergency measure.

Lidocaine

NODPA supports the relisting of Lidocaine and the reduction of the withdrawal time.

Lidocaine is very important for animal pain suppression and is a true local anesthetic. To ensure complete compliance with Section 205.238 Livestock healthcare standards farmers should be encouraged to use Lidocaine as a topical treatment.

Lidocaine is rapidly metabolized after absorption, with half-lives of 0.6 to 1 hour in most species. To satisfy the Animal Medicinal Drug Use Clarification Act (AMDUCA) requirement that an extended withdrawal interval (WDI) be used after extra label use of drugs, Food Animal Residue Avoidance Databank (FARAD) recommends that a 24-hour milk and meat WDI when lidocaine (with or without epinephrine) is used for local anesthesia in food animals. NOSB policy has been to double the withdrawal period, which would be 48 hours. Assuming the longer half-life, of 1 hour, the residue would be 3.6 x 10-15 times the original dose --far from detectable. (3.6 x 10-15 is (1/2)48.)

Procaine

NODPA supports the relisting of procaine and the reduction of the withdrawal time. Procaine is very similar to Lidocaine and should be an important and essential tool for farmers in animal welfare protocols because it is very important for animal pain suppression. It is a true local anesthetic and only numbs the area to be worked on. The withholding time should be the same as that recommended for Lidocaine, 48 hours.

Mineral Oil

NODPA supports NOC's comments "that the allowed use of mineral oil be clarified as being for topical use and as a lubricant, but not acceptable as a treatment for omasal impaction. To that end, we reference the 2015 Technical Review:

> Following the technical advisory panel review, the NOSB recommended inclusion of mineral oil for use as a veterinary treatment for omasal impaction in organic livestock production (USDA, 2003). However, based on consultations with the US Food and Drug Administration (FDA), the NOP was informed that mineral oil has not received approval through the FDA drug approval process to be authorized as a medical treatment in cattle, and the substance would not qualify for extra-label use by a licensed veterinarian (USDA,

2006). The US Environmental Protection Agency (US EPA) deferred to FDA as the appropriate regulatory body for the use of the substances. Accordingly, the NOP was unable to accept the NOSB recommendation to allow the use of mineral oil as a livestock medication under 7 CFR 205.603 (USDA, 2007). Mineral oil remains prohibited for use in organic livestock production as an orally administered treatment of constipation in cattle and other ruminants."