



# BEYOND PESTICIDES

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September 23, 2017

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

## **Re. LS: Defining Emergency Use of Parasiticides**

These comments to the National Organic Standards Board (NOSB) on its Fall 2017 agenda are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

Beyond Pesticides did not support the relisting of ivermectin and moxidectin in the 2015 sunset discussions, and we realize that all parasiticides have the potential for adverse environmental impacts. We support the annotation that prohibits the use of parasiticides except in emergency situations, and we agree with the commenters cited by the Livestock Subcommittee (LS) that “emergency situation” needs to be defined.

We also support the approach taken by the LS –to embed the pest management hierarchy in the livestock health care practice standard at §205.238. The proposal incorporates the pest management hierarchy of using management methods first, natural materials second, and approved synthetics as a last resort. However, the proposal results in a long addition to the regulations that spells out one example of a general rule. A similar section could be added for other materials on §205.603 –for example, describing when copper sulfate can be used for foot rot. Given that much of the proposed language is suggestive rather than prescriptive, it is not clear that it belongs in the regulations.

It also does not describe “emergency” conditions requested by commenters –unless the NOSB proposes that all use of a synthetic material in organic livestock should be in an emergency.

We suggest that the general rule be spelled out for livestock in §205.238(b), that the LS decide whether to propose “emergency” conditions for the use of parasiticides, and if so, that criteria for such emergency use be specified in §205.238(c)(4).

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is written in a cursive style with a large initial 'T' and a long, sweeping underline.

Terry Shistar, Ph.D.  
Board of Directors