



BEYOND PESTICIDES

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March 29, 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 Spring 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 suggest the following definition, which is an edited form of the definition suggested by NODPA:

A livestock emergency is an urgent, non-routine situation in which the organic system plan’s preventive measures and veterinary biologics are proven, by laboratory analysis and visual inspection, to be inadequate to prevent life-threatening illness or to alleviate pain and suffering. In such cases, a producer must administer the emergency treatment (§205.238(c)(7)). Organic certification will be retained provided, that, such treatments are allowed under § 205.603 and the organic system plan is changed to prevent a similar livestock emergency in individual animals or the whole herd/flock in future years as required under §205.238(a).

This definition contains elements establishing that a livestock emergency is urgent and non-routine, and defines these terms. The situation is urgent because it involves life-threatening illness or pain and suffering. It is non-routine because it is not preventable by the

producer's organic system plan's preventive measures and veterinary biologics. It is enforceable because it requires validation by laboratory analysis and visual inspection.

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, flowing style.

Terry Shistar, Ph.D.
Board of Directors