



BEYOND PESTICIDES

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March 23, 2018

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 2018 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.

Organic livestock producers who comply with the letter and spirit of organic regulations deserve our respect and support. They follow a difficult set of rules. They must ensure that their animals have outdoor access, they must provide organic feed, and they must treat sick animals –even if the treatment results in denial of organic certification. The NOSB is a major player in ensuring that the rules for organic livestock maintain consumer expectations while safeguarding the livelihood for producers.

When the NOSB drastically reduced the period between emergency treatment with parasiticides and sale of milk from treated animals, it increased the importance of defining “emergency” for such treatments. We support the subcommittee’s proposed definition and the proposed addition to §205.238 (b) that defines the context in terms of the farm’s Organic System Plan.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors