



WESTERN ORGANIC DAIRY PRODUCERS
ALLIANCE

October 8, 2025

National Organic Standards Board

USDA-AMS

1400 Independence Avenue, SW

Washington, DC 20250-0268

RE: AMS- NOP-24-0034 - Livestock Comments

WODPA's Comments to the National Organic Standards Board

Fall 2025

November 4 – 6, 2025

Omaha, Nebraska

Livestock Comments

Dear National Organic Standards Board,

Thank you for this opportunity to comment on substances and discussion considered for the National Organic Standards Board (NOSB) Fall 2025. These comments are submitted on behalf of the Western Organic Dairy Producers Alliance (WODPA). WODPA'S mission is to preserve, protect, and ensure the sustainability and integrity of organic dairy farming. We represent organic dairy farms in the Western United States. WODPA is committed to advocating for organic dairies, their livelihoods and issues impacting the sustainability of the organic dairy industry. We value the opportunity to provide comments on both the sunset materials review as well as the Common OSP.

Please see our comments below:

Sunsets

Flunixin:

WODPA endorses the relisting of flunixin, as it remains one of the few approved substances available for effective pain management in livestock, addressing needs ranging from disbudding and lameness treatment to various other ailments. Ensuring continued access to flunixin is essential for our farmers to uphold the highest standards of animal welfare.

Poloxalene:

WODPA supports relisting poloxalene as an essential emergency treatment for bloat in cattle. Although preventive measures exist, farmers need poloxalene available onsite to address sudden cases. As an anti-foaming agent, it reduces surface tension so gases can escape, returning rumen contents to liquid. WODPA recognizes the need for poloxalene as an essential emergency treatment and urges NOSB to relist it as an approved material to ensure poloxalene is readily accessible for prompt use in emergent situations.

Oxytocin:

WODPA continues to advocate for the relisting of oxytocin, accompanied by an annotation that delineates its appropriate use for farmers and herd veterinarians. Historically, oxytocin has been administered to facilitate milk production or expedite milk let-down in animals. WODPA supports an annotation restricting oxytocin use solely to emergency situations related to labor and the immediate postpartum period, specifically not exceeding three days following birth. Nonetheless, it remains crucial for oxytocin to be available as a prescribed option for veterinarians and accessible for farmers when necessary.

Synthetic Compostable Polymers:

WODPA notes agreement with the crops subcommittee's findings regarding the allowance of synthetic compostable polymers as organic compost feedstocks, stating this is not considered compatible with a system of organic agriculture. We would like to reference comments from the National Organic Coalition (NOC) opposing this allowance since the issue was first discussed by the NOSB. The limited scope TR supports the studies and conclusions previously cited in NOC's comments. NOC and WODPA request that the full Board follow the crops subcommittee's recommendation and advise the NOP against permitting these materials as compost feedstocks.

The crops subcommittee identified several points:

- Evidence indicates potential human health risks from contaminants such as PFAS, undisclosed synthetic additives, and microplastics, which may accumulate in soils and enter the food chain.
- There is environmental uncertainty due to the range of materials, proprietary formulations, and variable degradation in real-world composting.
- Regulatory limitations exist within ASTM standards, which are voluntary, periodically revised, and do not include contaminant control measures.
- Existing plant/animal-based feedstocks and currently listed synthetics are deemed sufficient for composting needs without introducing additional risks.
- Composters have reported operational challenges in distinguishing compostable synthetics from prohibited plastics, often leading to removal from feedstock streams.

Additionally, NOC has noted that NOP has not accepted third-party certifications, most recently with respect to marine material restrictions. Third-party certifications can change without public input and are outside NOP's direct oversight, potentially impacting organic production requirements. NOP has also been reluctant to cite external governmental standards, as these may change without involvement from the organic community. For these reasons, WODPA suggests that organic compost standards be maintained within relevant regulatory frameworks rather than being delegated to outside organizations.

Additional Comments

Common Organic Systems Plan (OSP):

WODPA has concerns regarding the creation and implementation of a common Organic Systems Plan (OSP). WODPA supports having a standardized template that is accepted by all certifiers, meets the necessary requirements established by the NOP and is easily accessible and understandable to farmers.

If a common OSP is endorsed by the National Organic Program, we would expect every certifier to accept it. Ideally, it would be available as a free resource to our farmers. We ask that this become a transparent process whereas farmers, farmer advocates and stakeholders are all involved in the creation and implementation of a common OSP as opposed to the current process whereas it is being driven by private entities.

There are multiple questions still outstanding that we would need answers to in order to support the implementation of the currently created common OSP.

1. Who will own each farmer's OSP if they are using this template?
2. Will certifiers be able to require farmers and handlers use the common OSP?

3. OSPs are usually updated annually to ensure compliance is being met prior to an onsite inspection. How will these updates happen? Will farmers be charged for each update?
4. Will the NOP continue to review the common OSP annually to ensure criteria is being met?
5. Will all certifiers have access to farmer's OSPs at all times or only for a set amount of time at annual inspections?

WODPA supports the creation of an easily understandable and accessible Organic Systems Plan. Above are just a handful of outstanding questions on what is currently being developed. We still continue to advocate for the availability of common templates available to be downloaded, printable and/or electronically saved from the National Organic Program. While we understand that this incurs cost to create, we also see immense value in these resources being available to farmers moving forward as new regulations and program updates are implemented.

Chlorine:

WODPA acknowledges the necessity for clear guidelines regarding the use of chlorine in the direct treatment of livestock. However, farmers often rely on multiple water sources across their operations for reasons of efficiency, sustainability, and availability. Given this diversity of sources, WODPA considers it impractical and potentially financially burdensome for farmers to conduct regular testing of every water source for chlorine content.

New World Screwworm:

The New World screwworm fly (*Cochliomyia hominivorax*), found in Cuba, Haiti, the Dominican Republic, and much of South America, burrows its larvae into living tissue, affecting livestock, wildlife, pets, and humans. After eradication from the U.S. and Mexico in the late 20th century, the insect has reemerged, recently detected near the Texas border. Mexican authorities now require ivermectin treatment for cattle before transport, recording over 6,700 cases since November 2024. Livestock movement from Mexico to the U.S. is paused, while the U.S. works to ramp up sterile fly production and develop a vaccine. Texas, home to many organic dairy animals and a major exporter, remains vulnerable to disease spread. Treatments include pour-on Ivermectin and Dectomax-CA1, an FDA-approved injectable protecting against infestation for 21 days. Ivermectin and likely Dectomax are not currently listed as approved treatments. We strongly encourage the NOSB and certifiers to be proactive in allowing treatments to be available to producers for the New World Screwworm Fly.

Rulemaking on Meloxicam

WODPA extends its appreciation to the NOSB for recommending the inclusion of Meloxicam on the National List. We respectfully request that the NOP initiate the Notice of Proposed Rulemaking and publish the proposed rule promptly, enabling progress toward adding this material to the approved materials list with species-specific withdrawal restrictions. The introduction of an additional pain mitigation option would represent a significant advancement in animal welfare within the organic dairy sector.

Summary

WODPA thanks the National Organic Standards Board for the opportunity to comment. We thank you for your commitment to organic agriculture and for ensuring the integrity of the organic seal.

Respectfully submitted,



Lia Sieler

Executive Director, Western Organic Dairy Producers Alliance

Lia.wodpa@outlook.com • (209)712-9470