



**WESTERN ORGANIC DAIRY PRODUCERS**  
**ALLIANCE**

To: Jared Clark, Assistant Director, Standards Division  
National Organic Program  
USDA-AMS-NOP  
1400 Independence Ave. SW  
Room 2642-South, Stop 0268  
Washington, DC 20250-0268

*Docket number: AMS-NOP-22-0029*  
*Regulatory Information Number (RIN): 0581-AE25*

Submitted electronically on May 21, 2026

Dear Mr. Clark,

The mission of the Western Organic Dairy Producers Alliance (WODPA) is to preserve, protect, and sustain the integrity of organic dairy farming across the West. WODPA represents producers at the local, state, and national levels and advocates on the issues that most directly affect organic dairy operations. We are writing in strong support of *section C. Meloxicam (Livestock)* of the proposed rule and urge USDA to add meloxicam to the National List [7 CFR 205.603\(a\)](#) as an allowed synthetic substance for use in organic livestock production. This action would give organic producers an important, practical tool to manage pain and inflammation while continuing to meet the high animal welfare standards expected under organic certification.

We also recommend clarifying the proposed annotation as follows:

(20) Meloxicam (CAS #71125-38-7)—Federal law restricts this drug to use by or on the lawful written or oral order of a licensed veterinarian, in full compliance with the AMDUCA and [21 CFR part 530](#) of the Food and Drug Administration regulations. Also, for use under [7 CFR part 205](#), the NOP requires:

- (i) Use by or on the lawful written order of a licensed veterinarian; and
- (ii) A withdrawal period of at least two times that specified by a licensed veterinarian.

We oppose adding further restrictions to the annotation, such as a minimum withdrawal period for bovines or limiting non-bovine use to disbudding and dehorning. Additional restrictions are unnecessary because licensed veterinarians are already responsible for prescribing lawful use under AMDUCA and applicable FDA regulations. Imposing extra limits in the National List would unnecessarily constrain veterinary judgment, reduce producers' ability to respond promptly to animal pain and inflammation, and undermine the practical value of this important tool.

Organic dairy producers operate under rigorous animal welfare expectations, and those expectations continue to grow through both certification requirements and marketplace demands from buyers and brokers. In practice, many handlers now expect separate animal welfare certifications in addition to compliance with the already stringent organic standards. Producers need effective, practical tools that help them meet these expectations while maintaining the integrity of organic production.

Consumers increasingly understand that organic certification reflects high production standards, including strong animal welfare expectations, and survey data show they value independent third-party verification. The NOSB's support for allowing meloxicam in organic livestock appropriately recognizes its role in responsible pain management under organic certification. For organic dairy producers, meloxicam would be a meaningful addition to a limited set of approved tools because it can provide longer-lasting pain relief during stressful events and is practical to administer in real-world farm conditions.

Because NOP animal welfare requirements are extensive, adding meloxicam to the National List would directly support producers in meeting and maintaining those standards. WODPA strongly urges USDA to move this petition forward without delay and finalize approval of meloxicam so organic livestock producers can use this valuable option to improve animal care on their farms.

We also urge USDA to maintain timely progress in this rulemaking and to communicate clearly about its status and next steps. Greater transparency and momentum in the process will help organic farmers plan responsibly and continue delivering the high standard of animal care that consumers expect from the organic label.

Thank you for the opportunity to provide comment on this proposed rulemaking. We appreciate USDA's consideration of this important issue and strongly support a final rule that adds meloxicam to the National List.

Sincerely,



Lia Sieler, Executive Director

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