

WESTERN ORGANIC DAIRY PRODUCERS
ALLIANCE

May 4, 2026

National Organic Standards Board

USDA-AMS

1400 Independence Avenue, SW

Washington, DC 20250-0268

RE: AMS- NOP-25-0914-0001 - Livestock Comments

WODPA's Comments to the National Organic Standards Board

Spring 2026

May 12 – 14, 2026

Omaha, Nebraska

Livestock Comments

Dear National Organic Standards Board,

Thank you for providing us with the valuable opportunity to submit our comments and perspectives regarding the various substances and topics currently under consideration by the National Organic Standards Board (NOSB) for the Spring 2026 session. These remarks are respectfully submitted on behalf of the Western Organic Dairy Producers Alliance (WODPA), an organization dedicated to representing the collective voice and interests of organic dairy farmers located throughout the Western United States. As an alliance, we are deeply committed to advocating for the well-being and ongoing viability of organic dairies, safeguarding the livelihoods of those who work within the industry, and addressing the wide range of issues that affect the sustainability and future growth of organic dairy production. We greatly appreciate this forum to share our insights, especially with respect to the Sunset Materials review, and we value the NOSB's dedication to maintaining high standards and transparency within the organic sector.

Sunsets

WODPA supports relisting all materials up for sunset review for Livestock.

- **Activated Charcoal**
 - WODPA supports the ongoing approval of this synthetic substance for livestock care. It is utilized sparingly and in limited quantities, with minimal environmental impact. Moreover, its application contributes to reducing or preventing distress and mortality among livestock.
- **Calcium borogluconate & Calcium Propionate:**
 - WODPA supports the inclusion of calcium borogluconate & calcium propionate among the three primary forms of calcium available in supplements for the management of milk fever. Calcium borogluconate is recognized as an effective option for promoting swift recovery from bovine illnesses.
- **Chlorine Materials:**
 - Calcium Hypochlorite
 - Chlorine Dioxide
 - Hypochlorous Acid – generates from electrolyzed water
 - Sodium Hypochlorite
- **Kaolin Pectin:**
 - WODPA supports relisting kaolin pectin as an essential, as-needed treatment for livestock gastrointestinal issues.
- **Mineral Oil:**
 - Although mineral oil is not used often, it is regarded as vital. A lack of mineral oil can lead to significant negative effects on animal welfare.
- **Nutritive Supplements (injectable trace minerals, vitamins and electrolytes):**
 - During periods of stress, some animals require rapid delivery of vitamins and minerals directly to target tissues. If animals are not eating, oral supplements are ineffective, so injections may be necessary. With antibiotics prohibited in certified organic livestock, farmers and veterinarians rely on available tools to maintain animal health. Injectable vitamins and minerals, permitted strictly when needed, support immune function and overall welfare.
- **Propylene Glycol:**
 - WODPA regards propylene glycol as a medical treatment for ketosis with restricted application and suggests it should be relisted.
- **Sodium Chlorite, acidified**
- **Zinc Sulfate:**
 - WODPA advocates for the relisting of Zinc Sulfate, primarily for footbath use to control foot rot. Maintaining access to this material is essential to reduce reliance on alternative products with greater environmental impact.

WODPA supports relisting all materials up for sunset review for Crops.

Chlorine Materials Proposal:

Motion to amend chlorine at 7 CFR 205.603(a)(10) as follows:

(10) Chlorine materials—disinfecting and sanitizing facilities, equipment, and livestock drinking water. Residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.

WODPA recognizes the importance of clarifying how chlorine is used and measured in the drinking water provided to organic livestock and aims to ensure certifiers are consistent when chlorine is added on farms. A key point to note is that only water with added chlorine needs to be tested and comply with the requirements of the Safe Drinking Water Act—not all drinking water. Chlorine can enter livestock water from various sources, such as municipal supplies or wells treated for bacterial contamination. Simply adding "livestock drinking water" to the chlorine guidelines overlooks the issue's complexity. Without clearer instructions, WODPA worries that certifiers might begin requiring tests on all livestock drinking water to meet Safe Drinking Water Act standards. WODPA respectfully requests that the proposal be returned to the subcommittee for additional research and refinement of its language.

Third Party technical reviews (TR):

WODPA welcomes adding this to the Policy and Procedures Manual, formalizing what has long been Board practice. Petitions should be reviewed transparently, with thorough third-party verification available to all community members. The TR serves as a reference in the petitioned substances database, helping future Boards understand the reasons for listing a material. Requiring a TR helps ensure integrity in decision-making.

Additional Comments

New World Screwworm:

New World Screwworm (NWS, *Cochliomyia hominivorax*) is an exceptionally destructive pest. NWS fly larvae, commonly referred to as maggots, invade living animal tissue, causing severe and often fatal injuries. This species can infest warm-blooded hosts, including livestock, pets, wildlife, humans, and birds.

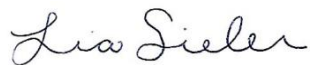
The designation "screwworm" stems from the larvae's distinctive feeding behavior, whereby they burrow into wounds in a manner similar to a screw entering wood. Maggots cause extensive tissue damage with their sharp mouth hooks; as additional larvae hatch, the wound may enlarge and deepen due to continued feeding on viable tissue. The consequences of NWS infestations are considerable, frequently resulting in life-threatening conditions for affected animals. Adult screwworm flies are similar in size to houseflies, or slightly larger, and are identified by orange eyes, metallic blue or green bodies, and three prominent dark stripes along their backs.

A significant challenge has arisen in that the USDA currently provides conventional treatment options for farmers but has not prioritized the development of organically approved alternatives. At present, PyGanic Specialty appears to be the sole OMRI-approved organic treatment available. Although its efficacy against larvae is unconfirmed, it may offer some potential. There remains a need for a suitable wound treatment option, and the optimal solution has yet to be determined. While PyGanic is not listed as a treatment option on the USDA website, it belongs to the same class as most of the listed products ([Pesticides for Control of New World Screwworm](#)). It is critical that the NOSB and certifiers take proactive measures to ensure that effective treatments are accessible to producers managing New World Screwworm infestations.

Summary

WODPA appreciates the opportunity to provide comments to the National Organic Standards Board. We commend your dedication to organic agriculture and your efforts in maintaining the integrity of the organic seal.

Respectfully submitted,



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