



April 3, 2024

National Organic Standards Board
USDA-AMS
1400 Independence Avenue, SW
Washington, DC 20250-0268

Docket: #AMS-NOP-23-0075
Livestock Substances 205.603
Livestock Subcommittee: Sunset Reviews

Dear National Organic Standards Board,

Thank you for this opportunity to comment on substances and discussion considered for the National Organic Standards Board (NOSB) Spring, 2024. 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, representing approximately 230 organic dairy farm families in the western United States. WODPA is committed to advocating for organic dairies, their livelihoods and issues impacting the sustainability of the organic dairy.

Our comments on the Livestock Subcommittee's Sunset Review of Livestock Substances §205.603 follows:

Atropine: WODPA supports the relisting of atropine due to its essentiality as an organophosphate poisoning treatment. The technical report describes it as a benign treatment without a holistic or natural alternative. We support the requirement for a withdrawal period of at least 56 days after administering to livestock intended for slaughter; and a milk discard period of at least 12 days after administering to dairy animals.

Hydrogen Peroxide: WODPA supports the relisting of hydrogen peroxide as a safer alternative to chlorine- based and other toxic sanitizers. It is useful as an ingredient in pre-dips as well as for cleaning wounds and using in foot baths for dairy animals. It also breaks down quickly to oxygen and water, and therefore does not have a residual effect.

Iodine (a)16 & (b)(4): WODPA supports the relisting of Iodine as a disinfectant, sanitizer and medical treatment. It is important to encourage the use of iodine to ensure milk quality, promote animal health and used as a disinfectant in teat dips and multiple other situations including dipping calf navels, as a pre and post dip, etc. NPEs in the dairy industry have been transitioned out and are no longer included to meet the demand for export requirements. This has been accepted industry wide for multiple years now and plenty of iodine products free from NPEs are available for use.

Magnesium Sulfate: WODPA supports the relisting of magnesium sulfate as it is essential for organic livestock production. It is used as an essential feed additive and in mineral mixes as necessary. It acts as an anticonvulsant, laxative and electrolyte replacement aid and may also be used to treat malignant hypothermia.

Fenbendazole: WODPA supports the relisting of fenbendazole to be used as emergency treatment for dairy and breeder stock when organic system plan- approved preventative management does not prevent infestation.

Moxidectin: WODPA supports the relisting of Moxidectin as an allowed treatment in an emergency for dairy and breeder stock when organic system plan – approved preventative management does not prevent infestation. It is one of the only parasiticides still available to use.

Peroxyacetic/ Peracetic acid: WODPA supports the relisting of peracetic acid as a disinfectant, sanitizer and medical treatment as applicable. In addition, it is a great option for sanitizing processing equipment. It has lower residual activity than chlorine- based disinfectants.

Tolazoline/ Xylazine: WODPA supports the relisting of both tolazoline and xylazine with limit to only use by veterinarians in full compliance with the restrictions set forth.

Trace Minerals/ Vitamins: WODPA supports the relisting of trace minerals and vitamins as a feed additive to enrich or fortify feeds when approved by the FDA. NOP requires livestock ruminants to be pastured but there may be deficiencies in that pasture that need to be

mitigated with the use of supplemental trace minerals and vitamins. The addition of vitamins into livestock rations are essential and regulated by the FDA.

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,

A handwritten signature in cursive script that reads "Lia Sieler".

Lia Sieler
Executive Director
Western Organic Dairy Producers Alliance