



April 4, 2023

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

Docket: #AMS-NOP-22-0071
Livestock Substances 205.603 & 205.604
Livestock Subcommittee: 2023 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, 2023. 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, §205.604 follows:

Ethanol Alcohol (sanitizer): WODPA agrees with the Livestock subcommittee's review of this material as being aligned with the OFPA. We urge this material to remain an approved material for organic livestock farm use.

Isopropanol Alcohol (sanitizer and/or disinfectant): WODPA agrees with the Livestock subcommittee's review of this material as being aligned with the OFPA. This material is used

frequently in organic operations we represent. Therefore, we urge the review board to continue listing Isopropanol Alcohol as an approved material for organic livestock farms.

Aspirin (inflammation control): WODPA agrees with the Livestock subcommittee's review of this material as being aligned with the OFPA. This material is used frequently in organic operations we represent. This is especially vital in pain mitigation efforts as a component of good animal welfare on farms. Therefore, we urge the review board to continue listing Aspirin as an approved material for organic livestock farms.

Vaccines (preventative health): WODPA urges the inclusion of this material as an approved material for use in organic livestock operations. The use of vaccines is critical to the success of organic livestock farms just as it was agreed by multiple stakeholders during the 2018 sunset review of its inclusion. WODPA agrees with the rewording suggested by NOSB that states "(e) Excluded methods, except for vaccines: Provided that, **vaccines produced through excluded methods may be used when an equivalent vaccine not produced through excluded methods is not commercially available.**" Therefore, we urge the review board to continue listing hydrated lime as an approved material for organic livestock farms.

Electrolytes: WODPA agrees with the Livestock subcommittee's review of this material as being aligned with the OFPA. This material is used frequently in organic operations we represent and is an essential material for the success of our farms and health of the animals. Therefore, we urge the review board to continue listing Electrolytes as an approved material for organic livestock farms.

Glycerin (teat dip): WODPA urges the inclusion of this material as an approved material for use in organic livestock operations. We agree with the public comments from 2018 in support of listing glycerin as a livestock teat dip. Although there are alternatives to using glycerin, this material is an added tool in the organic toolkit that should be available for organic farmers to use in controlling mastitis. Therefore, we urge the review board to continue listing Glycerin as an approved material for organic livestock farms.

Phosphoric Acid (equipment cleaner): WODPA urges the inclusion of this material as an approved material for use in organic livestock operations. Phosphoric acid is used in multiple operations in the West due to the nature of the minerals found in the ground water used for cleaning milk lines and bulk milk tanks. This specific type of acid is usually only used a few times during the month to ensure the buildup of these minerals and the bacteria buildup in the equipment does not affect the quality of the raw milk being shipped for processing. After use, the lines are purged with water (a rinse cycle) to ensure the milk going through those milk lines is not contaminated. The goal of our farms is to provide a safe, quality, organic product for

consumers to enjoy. Without the use of Phosphoric acid, we will have a hard time ensuring the cleanest and safest product reaches consumers. Therefore, we urge the review board to continue listing Phosphoric Acid as an approved material for organic livestock farms.

Hydrated Lime (disease control): WODPA urges the inclusion of this material as an approved material for use in organic livestock operations. Hydrated Lime is regularly used to control the spread of environmental disease and for parasitic control on organic farms. Currently, our farms are not familiar with an adequate and comparable alternative. Therefore, we urge the review board to continue listing hydrated lime as an approved material for organic livestock farms.

Mineral Oil (topical use & lubricant): WODPA urges the inclusion of this material as an approved material for use in organic livestock operations. Mineral oil is specifically used on farms we are associated with as a topical remedy for parasite control. Farmers require labeling when purchasing mineral oil that clearly states “100% mineral oil”. That label is to remain on the bottle as long as the mineral oil is in use. Mineral oil is essential for livestock parasite control. Therefore, we urge the review board to continue listing Mineral Oil as an approved material for organic livestock farms.

2023 Research Priorities Discussion Document: Spring 2023

WODPA would also like to convey our support for the research priorities under “Livestock”, specifically calling out our support for items 5 and six written below:

“5. Develop a dairy program to address climate change mitigation strategies where production capabilities are not hindered, and effective forage rotations are maximized. 6. Develop balanced organic livestock rations that incorporate high percentages of diverse, regionally adapted grain crops to reduce the reliance on corn and soybeans and allow farmers to realize more marketing opportunities for a robust crop rotation.”

Climate change mitigation is a topic on everyone’s radar, especially in the dairy industry. As sustainable farmers are constantly trying to be the best stewards of their land, more programs, ideas and research is crucial to the improvement of their stewardship. In addition, research that can provide our farmers with better alternatives to include in their rations is necessary to better gain a foothold on the best efficiency and allow for better marketing strategies.

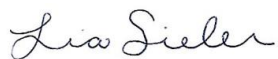
In addition, we want to convey our support for the “Crop” items also listed under research suggestions, specifically calling out number seven, written below:

“7. Strategies for the prevention, management, and control of problem insects and weeds.”

As organic farmers, it is very difficult to maintain and sustain your crops while fighting insects and weeds efficiently and effectively to provide the yields necessary per acre. Any research that can focus on ways to allow farmers to better tend to their land, the more beneficial they can be!

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