

TAP Reviews of Livestock Materials
Recommendation for Clarification of Information from TAP
Contractors
NOSB Livestock Committee

Introduction

OFPA 6518(m) lists seven areas of information to be addressed during the evaluation of materials for possible inclusion on the National List. The wording of these seven areas is inadequate when evaluating materials for livestock use. By clarifying OFPA 6518(m), TAP contractors will be able to focus their research on appropriate information, thereby producing a report for the NOSB that will allow it to make a well-informed decision regarding livestock materials. We are suggesting questions be appended to five of the seven areas of information addressed in OFPA 6518(m). Following the information in italics is verbatim from OFPA 6518(m). The questions following the italicized sections provide focus for a review when addressing a livestock material.

Recommendation

The NOSB recommends that TAP contractors address the following seven areas of information when preparing a TAP review for a livestock material in place of the areas of information listed in OFPA 6518(m).

(1) The potential of such substances for detrimental chemical interactions with other materials used in organic farming systems;

(2) The toxicity and mode of action of the substance and of its breakdown products or any contaminants, and their persistence and areas of concentration in the environment. What proportion of the chemical is excreted unchanged from the animal? What are the metabolites? Are there differences in toxicity, mode of action, etc. due to the route of entry? Do residues remain in animal tissue? Where? Discuss quantity, type, and persistence of residues.

(3) The probability of environmental contamination during manufacture, use, misuse or disposal of such substance. Discuss both the parent compound and its metabolites. Discuss use, misuse and disposal on farm. Discuss disposal of materials created during manufacture.

(4) The effect of the substance on human health. What are the impacts of human exposure due to the parent compound and the metabolites? What is the likelihood of human exposure via consumption of animal products

(e.g. eggs, milk, etc.) or animal meat? What is the present regulatory status of this material for livestock and human use?

(5) The effects of the substance on biological and chemical interactions in the agroecosystem, including the physiological effects of the substance on soil organisms (including the salt index and solubility of the soil), crops and livestock. Are the metabolites or the parent compound found in the feces? Urine? Will the parent substance or its metabolites adversely impact non-target organisms found in feces, soil, or water? Is the parent substance or its metabolites taken up by plants?

(6) The alternatives to using the substance in terms of practices or other available materials. What are the current practices for maintaining animal health within an organic system? In addition to suitable natural alternatives, are there other synthetic substances that are potentially more suitable?

(7) Its compatibility with a system of sustainable agriculture.