

From: Pooler, Bob
Sent: Monday, April 28, 2003 11:06 AM
To: Rose Koenig ; Ann Cooper; David Carter; Dennis Holbrooke; Nancy Ostiguy; Owusu Bandele; Rebecca Goldberg; George Siemon; James Riddle; Michael Lacy; Rebecca Goldberg; T. Mark King; Goldie Caughlin; Kevin O'Rell; Kim Burton
Cc: Benham, Katherine
Subject: FW: Amendment to petition (moxidectin)

Additional information on Moxidectin, the original petition is being mailed to you.

-----Original Message-----

From: Deborah Chaleff [mailto:CHALEFD@pt.fdah.com]
Sent: Wednesday, March 12, 2003 2:34 PM
To: Pooler, Bob
Subject: Amendment to petition (moxidectin)

Dear Mr. Pooler,

In correspondence dated November 22, 2002, Fort Dodge Animal Health submitted a petition for the evaluation of moxidectin for inclusion on the national list of substances allowed in organic production and handling. Some new information that is relevant to this petition has been subsequently obtained. This information is briefly summarized below. Fort Dodge would like to know if it is possible to submit this information as an addition to the original filing in the interests of full disclosure. Also, would providing this additional information in any way delay the review process?

The National Trust is a conservation body that owns and manages over 625,000 acres of land in England, Wales and Northern Ireland. Over 80% of this land is farmed, much of which is grazed by cattle and sheep. The Trust owns land "for the purposes of promoting permanent preservation for the benefit of the nation", and their grazing policies are designed to maintain the diverse pasture habitats for flowers, dung beetles, insect feeding birds, etc. As part of its environmental policy, the Trust prepared a guidance paper for its land agents and estate managers on the use of anti-parasitic drugs on trust-owned land in 1996. This guideline recommends that the use of avermectins (such as ivermectin and doramectin) on Trust-owned land be avoided, and that greater use be made of environmentally safer alternatives (e.g., moxidectin). The Trust has recently upheld this recommendation in a revised guideline. The decision support chart provided in this guidance document specifically bans the use of ivermectin in organic systems under their control, and approves their replacement with moxidectin. Fort Dodge would like to include this guidance document as additional supporting evidence for inclusion of moxidectin on the National List, as part of the review by the National Organic Standards Board.

Your guidance in this matter is greatly appreciated.

Sincerely,

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