



50 lbs Oyster Shells?

June 1, 1999

To the members of the National Organic Standards Board,

On behalf of the livestock committee of the Organic Trade Association (OTA), I am requesting your consideration of several questions and comments which have resulted from our discussions. Some may have easy answers but are not obvious from your recommendations or the Organic Foods Production Act. Others, we believe, will need your discussion in committees and as a full board. We bring these questions and comments to you in the spirit of cooperation and partnership.

In the NOSB recommendation for the National Materials List there is an allowance for the use of mineral oil for topical use and as a lubricant. Does use as a lubricant cover internal use for bloating, colic and other stomach disorders?

The OTA livestock committee recommends the following criteria for review of materials to be used in livestock production:

1. An equivalent substance can not be produced from a natural source and has no substitutes that are organic ingredients.
2. Its manufacture, use and disposal does not contaminate the environment
3. The nutritional quality of food is maintained and the material itself or its breakdown products do not have any adverse effect on human health.
4. It is compatible with the principles of organic production.

Additional considerations:

1. The use of a synthetic material is not a substitute for good organic management practices, such as culling, genetic selection or cleanliness.
2. The substance should not be a product of genetic engineering. An allowance or transition time (3-5 years) should be set for feed additives to give producers the time to find non-GMO sources so that they could come into compliance with a complete prohibition.
3. Feed and feed supplements must be from organic sources but food additives should go through the national list process.
4. A percentage in dry weight should not be set as a standard for supplements and additives because it is too arbitrary. For instance, oyster shells, which are not produced organically, make up at least 4% of feed for chickens so it would be easy for the total or supplements and additives to get over 5%. Prefer to stay with "as is" language.
5. In addition to the criteria for livestock material review, the NOSB should establish a list of criteria for the review of cleaning agents used in livestock and in processing.

The OTA livestock committee would like to submit the following recommendations for parasiticide use for your consideration: The use of parasiticides is:

1. prohibited in organic beef and hog production,
2. allowed for sheep production until 3 months prior to slaughter,

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3. allowed for breeder stock but not during the last third of gestation if progeny is to be sold as organic, and
4. prohibited during milk production if the milk is to be sold as organic or one year prior to lactation.

All other language previously recommended by the NOSB should remain as part of the standard. The recommendation should be reviewed in 2 years after implementation.

These recommendations from the OTA livestock committee are draft recommendations and have not yet been adopted as official positions of the Organic Trade Association.

In addition to these comments from the OTA livestock committee, I have two questions which need your advise:

It has come to my attention that there is some confusion in the organic industry currently about the requirement for certification in relation to private labels. The question is whether a retail company which owns a private label is required to be certified or is the certification of the co-packer sufficient? Can the private label product carry the seal or identification of the co-packer as an indication of certification of the product? The standing NOSB recommendation states that:

“...for the purposes of the OFPA, ‘receive or otherwise acquire’ means to take legal title to the organic product. Handlers who hold legal title to organic products shall be responsible for maintaining the organic integrity of the organic products they handle. ...The activity of individuals or businesses who do not take legal title to organic products but act as agents, licensees, employees, contractors, or subcontractors and who process, package, or store organic agricultural products for certified organic handling operation will be covered by the certification of that organic handling operation. ...examples include co-packers and co-processors.”

I have received requests for information on petitioning the NOSB to review materials in organic production. Has the NOSB established a procedure by which individuals and companies can petition the NOSB to consider materials for the National List of Allowed Synthetics or Prohibited Naturals? In reviewing the OFPA I found that this was one of the mandates given to the NOSB but I could not find in any such procedures in the documents released by the NOSB. Is this a procedure (or is there a form) that has been set up by the USDA National Organic Program staff?

Thank you for your consideration of these comments and questions.

Sincerely,

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Executive Director

cc: Keith Jones, USDA/National Organic Program manager