

ATTACHMENT 8

Jim Coakley, Cattleman, P.O. Box 6, Sterling, Co 80751, I have been involved in raising beef cattle and beef production through out my lifetime.

The beef cattle industry operates on a narrow margin. A small measure of error or a small measure of improvement can go a long way toward success or failure.

USDA Animal and Plant Health Inspection Service (APHIS) in conducting a Beef Cow-Calf Health & Productivity Audit, reported that the two most significant economic impacts to the beef herd is external and internal parasites. Followed by reproductive problems such as open cows and late calves, and the list goes on indicating everything from pink eye to pneumonia.

I think we will all agree the cost of producing organic beef is greater than other production methods. Beyond humane treatment and common sense is the economic impact. I have spent the last ten years involved in the production of natural beef and I can tell you from experience, without chemical crutches you need to do everything possible to let a calf be all that he can be if you expect to have anything left over. Good preventative health care that most importantly includes controlling parasites is a major factor. Cattle that aren't dewormed require more treatments for morbidity. Research reports that I have read also indicate greater death loss on non-treated cattle. The same research showed lower dressing percentage and a lower number of carcasses grading choice. If we are to present a product to the public and expect to receive a premium we will need every possible one to qualify and the quality unsurpassed.

Obviously some parts of the country will have fewer problems with parasites than others, however, no one is exempt from the problem. A research project over a six-year period examined nearly 53000 fecal samples from over 2700 farms. The results showed 92% of calves, 93% of yearlings, and almost 96% of cows tested positive for parasite eggs. Freezing does not kill the eggs and unhatched larvae can survive up to one year in manure patties. Research has been completed that indicates the economic benefit of parasite control on grazing cattle can amount to as much as \$30.00 per head. This does not take into account losses

due to grub damage to the hide as well as damage to the carcass affecting its quality, organic producers have to pass this loss on to consumers it will give the product a price disadvantage.

Proper management can effectively control losses to parasites and improve the health of cattle herds without adversely affecting the environment. It is estimated that horn flies alone may cost the cattle industry \$700.00 million each year. However research completed by Lee Townsend, University of Kentucky extension entomologist will tell you despite these losses, total control of the horn fly is not practical or even necessary. Correct diagnosis and timing are critical aspects for control of internal parasites and flies.

I feel we need a very clear scientific definition of organic. Some products that could possibly be prohibited are produced through fermentation of naturally occurring organic compounds found in the soil. One particular product that is indorsed for use in production of natural beef is eprinomectin. (Ivomec Eprinex) This product currently has no withdrawal time for consumption of beef or dairy products. It is registered for use in 90 countries. A paper that I read recently said that more than 50 million doses have been provided for use in humans and more than 2 billion doses for cattle. This reflects an excellent safety profile. There may be other methods of parasite control out there that is unknown at this time. If there are other methods that will be more cost effective and environmentally friendly they most likely will be discovered and put to practical use. I would hesitate to say if discovery would come over a 5-year or a 20-year period or ever for that matter. In lieu of that my suggestion is to indorse the most environmentally friendly, cost effective products available until something is discovered and proven, that can be used to take its place.