for the NOSB and NOP. Should off-label uses –that are not supported by regulation based on accepted scientific research– be allowed in organic production? If they are allowed, how is the public supposed to interpret that allowance as protecting organic integrity? If such uses are not allowed, does it put animals at risk? Since FDA does not force testing as entry to the marketplace, how can the NOSB and NOP ensure that animal drugs allowed under AMDUCA meet safety standards for drug use and the more stringent standards of OFPA? These questions do not necessarily need to be answered during this sunset review, but they should be acknowledged by the LS as valid concerns and put on the subcommittee's agenda as a discussion document.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors