



BEYOND PESTICIDES

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October 11, 2016

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Re. LS: Ivermectin

These comments to the National Organic Standards Board (NOSB) on its Fall 2016 agenda are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

In reviewing this substance, the NOSB must apply the criteria in the Organic Foods Production Act (OFPA), that its use—

- (i) would not be harmful to human health or the environment;
- (ii) is necessary to the production or handling of the agricultural product because of the unavailability of wholly natural substitute products; and
- (iii) is consistent with organic farming and handling.¹

We support the LS proposal to remove ivermectin from the National List because it does not meet OFPA criteria of absence of harm to human health and the environment, essentiality, or compatibility with organic production. The reasons were covered quite well in the LS proposal.

Ivermectin is not essential.

As the LS has shown based on the Technical Review, natural and available synthetic alternatives to ivermectin exist. One of the synthetic alternatives –fenbendazole– was recommended to the National List by the NOSB with the intention that ivermectin –and possibly moxidectin– would be removed from the list. In addition, Beyond Pesticides does not support the resistance management justification for listing synthetic materials. When alternative practices and nonsynthetic materials are available, the use of any synthetic material should be only a last

¹ OFPA §6517(c)(1)(A). Further details at OFPA §6518(m).

resort. The presence of a sizeable percentage of resistant pests would be an indication that a pesticide had been in use on more than a rare occasion.

Ivermectin harms the environment.

As documented in the LS proposal, ivermectin is toxic in the environment –most ivermectin is excreted in the feces, where it remains toxic, especially to larval insects. It has a negative impact on dung beetles, which are crucial to good organic pasture management and prevention of manure-breeding fly problems. Dung beetles are so important that they have been imported to places that lacked them.²

Ivermectin is not compatible with organic production.

The regulations at §205.238 require livestock producers to take measures to prevent disease. The regulations at §205.240 require pasture management to minimize and prevent the spread of diseases. NOSB Guidance on Compatibility calls for giving weight to a positive impact on biodiversity. NOSB Principles of Organic Production and Handling call for “Avoiding the routine use of chemical allopathic veterinary drugs, including antibiotics.” All of these statements of organic principles, taken together with the findings expressed in the LS proposal, indicate that use of ivermectin is not compatible with organic production.

Thank you for your consideration of these comments.

Sincerely,



Terry Shistar, Ph.D.
Board of Directors

² Nichols, E., S. Spector, J. Louzada, T. Larsen, S. Amezcuita, M. E. Favila, and The Scarabaeinae Research Network. "Ecological functions and ecosystem services provided by Scarabaeinae dung beetles." *Biological conservation* 141, no. 6 (2008): 1461-1474. Bomemissza, G. F. "The Australian dung beetle research unit in Pretoria." *South African Journal of Science* 75 (1979): 257-260.