



Your Link to Organic Agriculture and Sustainable Business

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Ms. Michelle Arsenault
Special Assistant
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, NW
Room 2648-So., Ag Stop 0268
Washington, DC 20250-0268
Reference Docket ID: AMS-NOP-13-0049

Dear Ms Arsenault:

Please find herein our *Public Comment* in support of **Listing Acidified Sodium Chlorite (ASC) Solutions, under the NOP:**

. 205.603 - Synthetic Substances Allowed for Use in Organic Livestock Production

As follows:

. 205.603 (a) (b)

(a) - As disinfectant, sanitizer, and medical treatment as applicable.

(b) - As topical treatment (teat dip), external parasiticide, or local anesthetic as applicable.

With the following:

Annotation - Allowed for use on Organic Livestock as a pre and post teat dip treatment with Lactic Acid (or other GRAS acids).

Although the *NOSB Livestock Sub-Committee* has voted not to list ASC, we would request that they reconsider their vote and vote to **Allow ASC**, for these specific reasons:



. The TAP Review was OK, however, there were several misleading statements within its text that need to be reconsidered based upon the following facts:

. **Essential & Availability:**

First, they list several optional/alternative materials on the NOP Allowed List; most are not effective, unavailable, and/or are restricted in use.

Only Iodine, Hydrogen Peroxide, and Chlorhexidine Gluconate (CHG) are available with some restrictions, however they are not always effective; depending upon the pathogen targets, method of use, and certain climatic conditions, whereas routine use can cause teat skin drying and irritation.

We believe in the long term, ASC is a wise choice for the health and welfare of the animal and the economic benefit of the farmer and consumer.

. **Efficacy and Environmental Concerns:**

The European Food Safety Agency (EFSA) states there is no evidence of pathogen resistance to ASC and/or environmental concerns, when used and handled as labeled.

Further, ASC is not Toxic in any way to either animal, human, or soil microorganisms when used as required.

Therefore we request that the *NOSB Livestock Subcommittee and NOSB* vote to **Approve and List ASC For Use In Organic Livestock Production** as petitioned!

If we can assist in any way, please do not hesitate to contact me. We appreciate and value your special consideration in this important matter.

Thank you and sincerely yours,

AgriSystems International

Thomas B. Harding, Jr. and Alesia A. Bock

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