



BEYOND PESTICIDES

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April 6, 2015

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: Copper sulfate

These comments to the National Organic Standards Board (NOSB) on its Spring 2015 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 groups around the world.

Current listing:

§205.603(b) As topical treatment, external parasiticide or local anesthetic as applicable.
(1) Copper sulfate.

Walk-through footbaths containing copper sulfate solution are used to help control and prevent hoof-related diseases in dairy cattle. One solution is considered effective for 150 to 300 animal passes. Spent solution is mixed with manure waste and ultimately disposed by land application.

Copper sulfate footbaths have a relatively low cost per footbath and appear to effectively control the infectious hoof diseases. The major concern is disposal of the copper sulfate solution, which is ultimately spread on the land with manure. It is possible that maximum soil copper loading rates may be exceeded in a relatively short time.¹

The technical review (TR) says there are no natural (non-synthetic) products available that can be used as a management strategy to treat hoof related diseases and lameness in dairy cattle and sheep operations.² Several management tools available can help reduce the cost of treatment and prevent hoof related diseases. These include the use additional dietary supplements (i.e., feeding of iodine, feeding of zinc methionine), free stall (cubicle) design, limit

¹ TR lines 119-127.

² The TR includes sheep, though the petition for zinc sulfate says sheep do not tolerate copper.

contact with gravel or rocky surfaces, and hoof trimming practices.³ Zinc sulfate has been petitioned for the use.

We suggest an annotation, **“Substance must be used and disposed of in a manner that minimizes accumulation of zinc in the soil, as shown by routine soil testing.”** This is comparable to the annotation for copper sulfate in crops.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a prominent initial "T".

Terry Shistar, Ph.D.
Board of Directors

³ TR lines 578-579.