



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

September 19, 2025

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

Docket ID # AMS-NOP-25-0034

Re. LS: Oxytocin annotation

These comments to the National Organic Standards Board (NOSB) on its Fall 2025 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 eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

Oxytocin is a hormone and, even if rarely used, it leaves organic dairy farmers open to valid criticism that they can still use hormones. Oxytocin may be a good treatment for prolapsed uterus, but alternative treatments are also available. Paul Dettloff's *Alternative Treatments for Ruminant Animals* lays out a procedure that uses some organically approved treatments and does not require oxytocin for a successful outcome. He uses a mixture of warm water and aloe vera with a tincture to induce uterine contractions. He says, "They usually breed back and won't prolapse the next time."

Prolapse should be a rare occurrence. Past comments have shown the annotation to be vague and that it was misused, to help cows let down their milk. Cows can become dependent on it for let-down. There are alternatives. It is a hormone and, even though its use is intended to be limited, it constitutes a use of hormone in organic dairy, which is contrary to consumer expectations. If oxytocin is relisted, it should have an annotation that is clear and universally implemented. The annotation should restrict its use to emergency situations and not for preventive routine use. The annotation should restrict oxytocin to treat conditions related to labor and to an animal's postpartum survival in emergency situations and severe complications in the immediate postpartum (following birth of young) period. This should be specified to be no more than three days postpartum, to state that it may not be administered to increase an

animal's milk production (volume) or for milk letdown. Federal law restricts this drug to use by or on the order of a licensed veterinarian (21 CFR 522.1680(c)(3)). We support the annotation proposed by the Livestock Subcommittee if oxytocin remains on the National List.

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 long horizontal stroke at the end.

Terry Shistar, Ph.D.
Board of Directors