

**Minutes of NOSB Livestock Committee Conference Call
April 27, 2001**

Members: Eric Sideman (chair), Marvin Hollen, Bill Welsh, Becky Goldberg, George Siemon, Willy Lockeretz, and Dave Carter

NOP representative: Mark Keating

Eric Sideman opened the meeting by noting that the updated TAP review on animal acids as livestock feed additives would be completed by May 15. Members discussed the importance of having TAP reviews reflect the real world decisions that producers face. They also stated that the consideration of alternatives must reflect genuine alternatives that are technically and commercially viable. The Committee as a whole discussed the importance of providing the full NOSB with a comprehensive review of this subject prior to the vote scheduled for the June meeting in La Crosse. A member raised the possibility of inviting expert testimony on this subject to La Crosse but the Committee was unaware if the revised NOSB policy on such testimony had been implemented. The Committee agreed to further develop its position on amino acids after the updated TAP review is completed.

The Committee resumed its discussion of the role of pasture in ruminant production. The Committee discussed the options of using a subjective or objective descriptor in establishing the pasture requirement. The term "significant portion of the feed" was used as an example of a subjective term, while a numerical figure such as "50 percent" was cited as more objective. One member pointed out the difficulty for certifying agents in determining how much forage an animal actually grazes. Regardless of how the feed component provided by pasture is to be calculated, the Committee agreed that supplemental feed will also be necessary. The Committee discussed developing a standard that favored continuous improvement in the producer's pasture management system. The Committee also circulated an expanded discussion of the principles of organic pasture management for further consideration.

The Committee discussed several issues that were included in the draft review of livestock feed additives. Several members of the Committee felt that the allowance for synthetic vitamins was appropriate, but that a preference for natural forms of minerals should exist before synthetic forms could be used. The Committee also discussed how to address agricultural materials such as corn and soy that are used as carriers and fillers in formulated feed products including vitamins, minerals, and probiotics. The Committee discussed whether agricultural materials used as carriers and fillers must be organically produced or whether such a requirement would impose an unnecessary burden on producers trying to source such products. One member stated that some mineral and vitamin formulators were currently making an effort to provide products containing organically produced carriers and fillers. Questions remained surrounding how available such products are, whether the type of carrier or filler used had genuine impact on the production system, and what producers would do if organic carriers and fillers were required but unavailable.

The Committee discussed the framework for allowed feed ingredients in the final rule. Mark Keating explained that the final rule identifies three categories of allowed feed materials: (1) organic agricultural products; (2) nonsynthetic, nonagricultural products; and (3) synthetic materials included on the National List as feed additives and supplements. There are currently no percentage requirements or restrictions associated with use of any category. Eric Sideman discussed a proposal to allow up to 5 percent of the livestock feed from nonorganic natural products, whether agricultural or not. Such an allowance would be significant with regards to fish meal and fish oil. The OFPA defines fish as an agricultural product, therefore requiring that any feed materials that are naturally derived from fish must be organically produced. In the absence of organic production standards for fish, no organically produced sources of these materials are available. Mark Keating stated that the final rule contained a categorical requirement that

agricultural materials in livestock feed be organically produced in response to very strong public comment and that modifying this provision would require substantial justification. The Committee agreed to continue looking at how the current final rule feed ingredient categories would affect livestock producers. The Committee gave consideration to a TAP review for fish meal and fish oil. The Committee also stated that it would consider provisions for other feed ingredients including kelp.

Turning its attention to livestock health care, the Committee discussed vaccines produced with excluded methods or antimicrobials. Mark Keating stated that the NOP is working with the Animal Plant Health and Inspection Service (APHIS) and the Organic Trade Association (OTA) to identify livestock vaccines produced with excluded methods. Such materials are prohibited under the final rule but could be petitioned as allowed synthetics. The NOP is unaware of any vaccine currently used in organic production that is only available through the use of an excluded method. The NOP is committed to having allowed and prohibited vaccines clearly identified when the final rule is fully implemented. The Committee discussed creating an allowance for the use of antimicrobials that are added to vaccines as preservatives. The use of antimicrobials in sperm prepared for artificial insemination was also acknowledged. Mark Keating said that the Committee may wish to consider a broader allowance for the category of FDA approved excipients (minor functional components) used in livestock medications. The Committee agreed to take this issue under consideration.

The final issue on the Committee's agenda was proposed language on the stage of production exemption for temporary confinement of livestock. The Committee discussed the current proposed language for ruminants: dairy stock under the age of six months, bovine slaughter stock no more than the final 120 days. The Committee agreed to consider additional stage of production exemptions for additional species.

The Committee agreed to schedule its next call for May 29 at 10:00 am Eastern time.