

RESPONSE TO QUESTIONS PERTAINING TO ITEM 3

Intended use of the substance

Petition to Include Acid-Activated Bentonite
on the National List of Allowed Substances
for use in Organic Livestock Production
in consideration of §205.603

Types of Poultry Operations

1. **Is it primarily used as a broiler litter amendment?**
 - a. Yes. The primary use for Poultry Guard is as a litter amendment to control ammonia and lower the pH of the litter in commercial broiler production, but it is also used for this purpose in turkeys, ducks pheasants, quail and other poultry production.
2. **Describe whether the substance is also intended for use in other types of livestock production.**
 - a. Poultry Guard is also intended for use as a litter amendment in all types of commercial poultry production, i.e. turkeys, ducks, pheasants, quail, etc. It is not intended for use in beef, dairy, goat, sheep or swine production or in horse stalls.
3. **If used in other types of livestock production systems, describe how the product is used in these systems.**
 - a. Poultry Guard is intended for use only in commercial poultry production as listed in (a) above. In all types of poultry, the removal of ammonia improves the wellbeing of the bird by allowing it to be raised in a healthy environment.

Product Application

1. **When is the substance applied during the livestock production cycle?**
 - a. Poultry Guard is generally applied at the start of the production cycle.
 - i. For ammonia control Poultry Guard is applied after the removal of caked or crusted litter. Poultry Guard is applied at the rate of 100 lbs. /1000 ft.² evenly on top of the litter. Application should be as close to placement as possible, but no more than 3 days prior to placement. This application procedure applies to all classes of commercial poultry production.
 - ii. For pH reduction of bare ground prior to adding new litter the old litter should be removed, including corners and side wall areas, so as to provide a clean floor to apply Poultry Guard. Poultry Guard is applied at the rate of 100 lbs. /1000 ft.² evenly on the entire floor. New litter can be added immediately after application. This method is also used under slats in breeder operations.
 - iii. For “Deep Litter Treatment” (DLT) to lower the pH and eliminate ammonia in the total litter base, Poultry Guard is applied on top of the litter after crusting

or removing the hard cake or crust at the rate of 200 lbs. /1000 ft.² for every 3 inches of litter depth and then tilled into the litter. This application procedure applies to all classes of commercial poultry production.

- b. Is the substance applied when animals are present?***
 - i. Yes, it can be applied when birds are present, but is normally applied prior to placement.
- c. If substance may be reapplied while animals are present, describe the typical application rates and timing of the applications for the following production systems:***
 - i. Pullet production
 - 1. Apply at the 100 lb. /1000 ft.² rate when ammonia levels exceed 25 ppm. The timing will vary with the ammonia challenge.
 - ii. Laying hen production
 - 1. Apply at the 100 lb. /1000 ft.² rate when ammonia levels exceed 25 ppm. . The timing will vary with the ammonia challenge.
 - iii. Turkey production
 - 1. Apply at the 100 lb. /1000 ft.² rate when ammonia levels exceed 25 ppm. . The timing will vary with the ammonia challenge.
- d. Following the initial application of the substance, how long is it until the substance is reapplied?***
 - i. ***If shorter than 17 weeks, what are the typical application times and rates for a pullet barn, if any?***
 - 1. When applied just prior to placement at the 100 lb. rate, control of ammonia should last for 10-20 days depending on the ammonia challenge. Reapply if ammonia levels exceed 25 ppm.
 - ii. ***If shorter than 60 weeks, what are the typical application times and rates for a laying hen barn, If any?***
 - 1. When applied just prior to placement at the 100 lb. rate, control of ammonia should last for 10-20 days depending on the ammonia challenge. . Reapply if ammonia levels exceed 25 ppm.
 - iii. ***If shorter than 30 weeks, what are the typical application times and rates in a turkey barn, If any?***
 - 1. When applied just prior to placement at the 100 lb. rate, control of ammonia should last for 10-20 days depending on the ammonia challenge. . Reapply if ammonia levels exceed 25 ppm.