FORMAL RECOMMENDATION BY THE
NATIONAL ORGANIC STANDARDS BOARD (NOSB)
TO THE NATIONAL ORGANIC PROGRAM (NOP)

Date: **April 29, 2010**

Subject: **Sunset Review of National List substances used in livestock production**

Chair: **Daniel G. Giacomini**

Recommendation

The NOSB hereby recommends to the NOP the following:
        Rulemaking Action: ___X___
        Guidance Statement: _____
        Other: ____ ___

Summary Statement of the Recommendation (including Recount of Vote)**:** The NOSB voted to renew one (1) substance on 205.604, with none deferred.

NOSB Vote: Motion: Jeff Moyer   Second: Jennifer Hall

Board vote: Yes - 14   No - 0   Abstain - 0   Absent - 1

Summary Rationale Supporting Recommendation (including consistency with OFPA and NOP)**:** Statements from the Livestock Committee explaining the rationale, supported through NOSB action, precedes the recommendation presented below.

Response by the NOP:

NOSB Livestock Committee – Sunset Recommendation – 2012

I.   List: 205.604 Nonsynthetic substances prohibited for use in organic livestock production

II.   Category Use
(a) Strychnine

III.   Committee Summary

Some commentors specifically mentioned that strychnine should remain as a prohibited substance on the National List. The Livestock Committee agrees with the commentors that strychnine should remain as a prohibited substance on the National List because its use negatively impacts humans and the environment, is not considered essential for organic production and is not compatible with organic production practices. While the committee did receive some comments that some forms of strychnine may be beneficial as animal health care products, the committee did not agree that this reason justified removal of strychnine from §205.604. Interested parties should proceed with the petition process for amending annotations to allow specific uses of strychnine.

IV.   Committee Recommendation(s):

The Livestock Committee recommends the renewal of the following substances in this use category:
        (a) Strychnine.

Moved: Dan Giacomini   Second: Wendy Fulwider

Committee vote: 5 -- yes; 0 -- no; 3 -- absent; 0 -- abstain