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April 15, 2009

Chief Standards Development and Review Branch
National Organic Program
Transportation and Marketing Programs
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW
Room 4008 South, Ag Stop 0268
Washington, DC 20250

Re: Docket Number AMS-TM-09-0014 : Injectable Vitamins and Minerals

Oregon Tilth Certified Organic (OTCO) is a nonprofit research and education membership organization dedicated to biologically sound and socially equitable agriculture. Oregon Tilth offers educational events throughout the state of Oregon and provides organic certification services to organic growers, processors, and handlers internationally. An NOP accredited certifier since 2002, OTCO currently certifies 660 farms and ranches in over 35 states, affording us a broad perspective of current practices and challenges faced by organic producers, as well as the effect that the anticipated successes and challenges of this discussion topic will have upon them.

OTCO has reviewed the discussion document regarding the use of injectable vitamins and minerals in organic livestock production. Oregon Tilth is supportive of the use of these materials in treatment and prevention of livestock illnesses and ailments. Many Producers currently utilize these products and with effective results. It has been our experience that these treatments are used judiciously and only as needed. Oregon Tilth encourages the continued discussion of regulation changes to allow these materials for organic livestock production.