

BUTORPHANOL

Motion: Butorphanol should be added to 205.603 synthetic substances allowed for use in organic livestock production with the following restrictions: For emergency medical use by a licensed practitioner. Withhold time shall be double the FDA requirement.

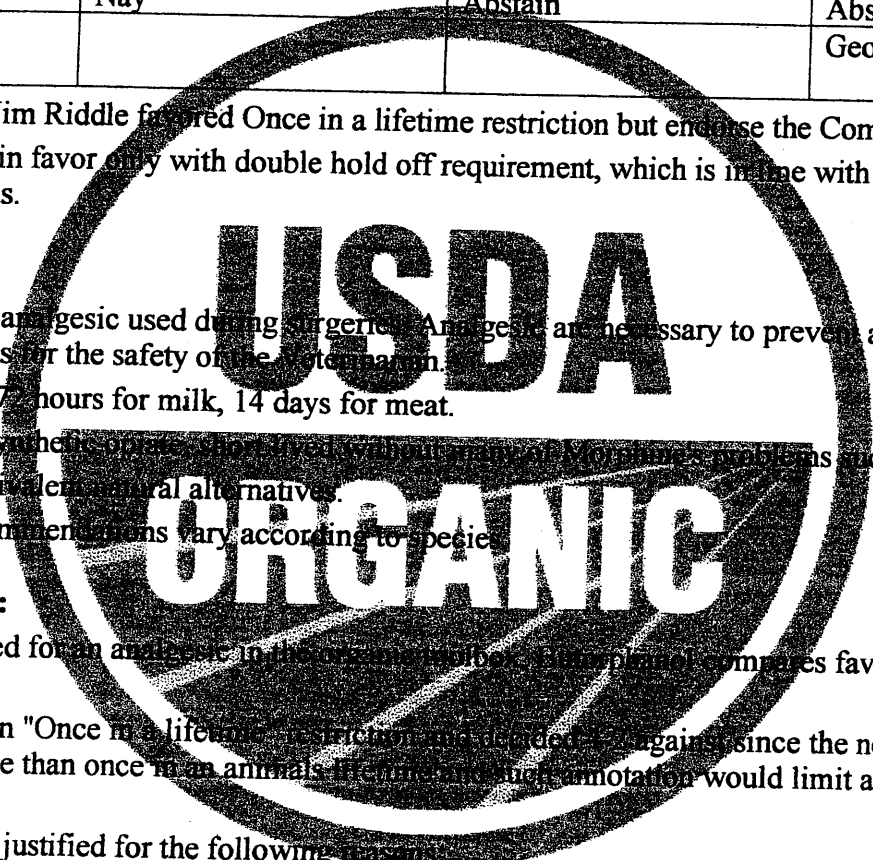
Vote tallies

Yea	Nay	Abstain	Absent
Dave, Michael, Jim Becky			George, Nancy

- Dave Carter and Jim Riddle favored Once in a lifetime restriction but endorse the Committee's decision.
- Jim Riddle voted in favor only with double hold off requirement, which is in line with IFOAM, EU, and CODEX Standards.

Background:

- Butorphanol is an analgesic used during surgeries. Analgesic are necessary to prevent animal pain and suffering as well as for the safety of the veterinarian.
- FDA with hold is 72 hours for milk, 14 days for meat.
- Butorphanol is a synthetic opiate. It is not without many of the opium's problems such as addiction.
- TAP found no equivalent natural alternatives.
- FDA hold off recommendations vary according to species.



Summary of Opinion:

- There is a clear need for an analgesic in the organic livestock. Butorphanol compares favorably against other synthetics.
- Committee voted on "Once in a lifetime" restriction and decided to disagree since the need for a analgesic could come up more than once in an animal's lifetime and such annotation would limit a Veterinarian's Best Judgment.
- Double withhold is justified for the following reasons:
 - 1) Allows use of the material without causing undue hardship on organic producers;
 - 2) Consistent with requirements of European Union and Codex;
 - 3) Consistent with NOP requirement for pesticide residue tolerance of 5% of EPA tolerance;
 - 4) Consistent with stricter standards for use of raw manure for organic production; and
 - 5) Consistent with consumer perceptions of organic products.