

Our comments on various issues in front of the NOSB and the NOP follow. Respectively submitted by Ed Maltby, NODPA Executive Director

NODPA is a member of the National Organic Coalition (NOC) and a member of their NOSB committee. NODPA has participated in the discussion by NOC of all the guidance and recommendations that the NOP has published for this upcoming meeting of the NOSB. We generally support the comments and recommendation for action within the comments presented by NOC.

GMO Vaccines

We support in general the exhaustive comments by the National Organic Coalition (NOC) which illustrate how deeply the Coalition thought through the subject and tried to deal with the serious issues that these materials present to the organic community and consumers of organic products. The use of GMO vaccines as a preventative measure for organic livestock has been bouncing back and forth between the NOP and NOSB for the last five years, with certifiers and producers interpreting the regulations in many different ways. NOC's comments provide a balance between doing nothing and allowing the status quo of inconsistent implementation, allowing all vaccines regardless of whether they are GMO based and following a simple legal position that effectively bans all GMO derived vaccines.

We hope that when the Board looks at these recommendations they will consider the realities of organic livestock farming which is a very uncertain business with a major dollar investment in livestock, buildings and land. Livestock farming is subject to many difficult problems from weather, economics, outside contamination, excessive paperwork and many state and federal regulations. At this time, the regulations are clear that vaccines derived from GMO's are not allowed. What we don't want coming out of this NOSB meeting is a headline that Jim Riddle has posed "National Organic Board Recommends Allowance of GMO Vaccines for Organic Livestock - GMO-treated meat, milk, and eggs could be sold as "organic." Organic dairy has already had that kind of public exposure from the Office of Inspector General's report on GMO's in organic feed.

We do need vaccines to deal with emergencies, whether they are GMO based or not, and not lose certification. There is already a provision in regulations for emergency treatments that can be further defined for use of non-approved vaccines.

We may not need GMO vaccines for regular production practices that are the key to preventative care for livestock. We don't always know which vaccines are or are not derived from GMO's so in many cases we don't know what choices we have. Labels are confusing and generally do not list if the vaccines are derived from GMO's.

What livestock producers need **is a list of allowed vaccines from which to choose, and consistent implementation of the regulations by inspectors and certifiers.** Farmers will respond to designated emergencies whenever they happen. Those emergencies will not be caused by organic farming or by any direct action of organic farmers. In an emergency we don't want to have to make a choice between losing organic certification or losing livestock and years of breeding, genetic improvement and our livelihood.