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**Comments of the Organic Materials Review Institute
Spring 2012 National Organic Standards Board Meeting
Albuquerque, New Mexico May 22-25, 2012**

The Organic Materials Review Institute (OMRI) thanks the National Organic Standards Board (NOSB) for the opportunity to comment on items in this meeting's agenda [Docket No. AMS–NOP-12-0017]. OMRI is an independent non-profit institute that provides professional, independent and transparent review of materials and processes to determine their suitability for producing, processing, and handling organic food and fiber. OMRI was started in 1997 by a partnership of certifiers, the industry, and organizations that have an interest in organic farming.

GMO Vaccines

OMRI has no opinion on the recommendation. However, we would like to note that the Technical Review and subsequent recommendation should provide detail as to how they calculated the number of GMO vaccines on the market. In OMRI's research of GMO vaccines, APHIS requires that GMO vaccines be licensed and identified by an "R" in the product code in the Catalogue of Veterinary Biologics. However, in our understanding the APHIS definition for GMO vaccine that must be labeled with an "R" may not entirely coincide with the NOP regulations definition for 'excluded methods.' The Technical Report failed to detail whether the definition from APHIS for GMO vaccines was equivalent to the NOP regulations. Thus, OMRI suggests the committee table this discussion until an accurate picture of the vaccine market that meets the definition of 'excluded methods' according to 7 CFR Part 205.2 can be obtained.

A handwritten signature in black ink that reads "Peggy Miars". The signature is written in a cursive, flowing style.

Peggy Miars
Executive Director/CEO

A handwritten signature in black ink that reads "Lindsay Fernandez-Salvador". The signature is written in a cursive, flowing style.

Lindsay Fernandez-Salvador
Program Director