

National Organic Standards Board
Spring 2012 Meeting
Albuquerque, NM

Re. Vaccines from Excluded Methods

Dear Board Members:

These comments are submitted on behalf of Beyond Pesticides. Beyond Pesticides, founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and groups around the world.

We urge the Board to reject the Livestock Committee recommendation to allow use of vaccines from excluded methods without review in “emergencies.”

Of the approximately 73 registered animal vaccines, 13 are produced using excluded methods (GMO vaccines.) Only two vaccines, Bovine and Avian Salmonellosis, appear to be presently available only as GMO. GMO vaccines are not legally allowed in organic production. This recommendation proposes a change which will allow GMO vaccines only in a declared emergency without losing organic status of livestock.

The Livestock Committee does not dispute the fact that the categorical approval of GMO vaccines fails all three criteria—need, impacts on humans and the environment, and compatibility with organic principles. The recommendation would allow unreviewed GMO vaccines to be used in organic production under certain prescribed “emergency” conditions. We are concerned with the possibility for abuse of such an emergency allowance, in part because we have seen how emergency exemptions for pesticide use have been misused, in spite of every effort to tightly define an “emergency.”

If the NOSB is to allow GMO vaccines for emergencies, they still must ensure that OFPA criteria are met.

The Board must address questions having to do with the need for the vaccines.

- Are vaccines needed for illnesses for which GMO vaccines are the only ones available?
- What other means are available for preventing and treating these diseases?
- If the problem is a general one of unavailability of non-GMO vaccines, how does the emergency provision help organic producers comply with general prohibitions on GMO vaccines?
- What types of emergencies might require the use of these vaccines?

The Board must address questions having to do with the materials and their impacts.

- What kinds of genetic modifications will be allowed?
- What are the risks associated with these modifications and their use in vaccines to the treated animals, people who consume the meat, and the ecosystem?

The Board must address issues of compatibility with organic principles.

1. Why should the general prohibition on excluded methods be waived in the case of vaccines?
2. How do inspectors and certifiers verify compliance with the rule?

Finally, the Board must address issues specifically related to a policy of allowing use of an otherwise prohibited substance in an “emergency” situation.

1. What is an emergency? What kind of emergency would require the use of GMO vaccines?
2. How long does the emergency last?
3. Who can declare an emergency?
4. What kind of alternatives would need to be considered before deciding that an emergency justifies use of GMO vaccines?

Since this analysis appears not to have been done, we urge the Board to reject the Livestock Committee’s recommendation.

Sincerely,

Terry Shistar
Board of Directors