

**Formal Recommendation by the
National Organic Standards Board (NOSB)
to the National Organic Program (NOP)**

Date: May 25, 2012

Subject: GMO Vaccine information request

Chair: Barry Flamm

The NOSB hereby recommends to the NOP the following:

Rulemaking Action _____
Guidance Statement _____
Other X

Statement of the Recommendation (Including Recount of Vote):

See attached

**Rationale Supporting Recommendation (including consistency with
OFPA and NOP):**

See attached

Committee Vote:

Moved: Nick Maravell

Second: Wendy Fulwider

Yes: 14

No: 0

Abstain: 1

Absent: 0

Recusal: 0

Resolution of the NOSB to the NOP on GMO Vaccines

The NOSB and its Livestock Subcommittee request additional detailed information from the NOP and other USDA agencies in order to create a meaningful and implementable recommendation regarding the use of GMO vaccines in organic agriculture.

The NOP rule allows for an exemption specifically for use of vaccines produced with “excluded methods” (GMO vaccines) if they have been petitioned and placed on the National List; no such specific vaccines have been petitioned and listed to date.

We have heard in comments leading up to and at our Spring 2012 meeting from consumers, veterinary experts, certifiers, livestock producers and others that they are unclear whether vaccines currently in use are produced with excluded methods. We have also heard that the organic community as a general principle strongly favors organic production that does not use GMO materials or “excluded methods.” Specifically, we have heard that consumers expect organic products to be produced without the use of GMOs.

In order to respond adequately and meaningfully to the NOP’s 2010 request that the NOSB evaluate vaccines produced with excluded methods as a class of materials for potential addition to the National List, the NOSB needs additional information from the USDA. We cannot determine the potential impact of our work unless we have a clear understanding of which specific vaccine products do and do not contain products of biotechnology, and clear information about which alternative vaccines exist for specific diseases.

Therefore we request that:

- NOP, and/or other appropriate USDA agencies, identify which currently available livestock vaccines are non-GMO and which are GMO derived, using the NOP definitions of excluded methods and with reference to specific pathogen strains, so that the NOSB, organic livestock producers, and organic certifiers can make informed decisions and meaningful recommendations.
- NOP, and/or other appropriate USDA agencies, encourage livestock vaccine manufacturers to voluntarily make truthful label claims as to the presence or absence of GMOs using the NOP definitions of excluded methods.
- NOP, and/or other appropriate USDA agencies, establish a real time publicly accessible tracking system to identify non-GMO and GMO vaccines, using the NOP definitions of excluded methods and with reference to specific pathogen strains, when vaccines are registered with USDA.

The NOSB, and the Livestock Subcommittee in particular, welcomes the opportunity to engage cooperatively with the NOP and other USDA agencies as we formulate

recommendations on GMO vaccine policy, and would be available to clarify and discuss this request.

Since this policy is a critical matter, with a Livestock Subcommittee proposal pending, we would like the NOP and/or other USDA agencies to provide information to the NOSB and the public at our next public NOSB meetings in October 2012 and Spring 2013 about any progress made or challenges encountered in responding to this request.

As a result of receiving public written and verbal comment, we will forward some additional questions, based on a draft presented at the public meeting and posted on the NOP website that could also assist in our policy formulation. We would be available to discuss the possibilities for answering these questions.

Committee Vote

Motion: Tracy Favre Second: Colehour Bondera

Yes: 8 No: 0

Absent: 0 Abstain: 0 Recuse: 0