

**November 6, 2018**

**MEMORANDUM TO THE NATIONAL ORGANIC STANDARDS BOARD**

**FROM:** Jennifer Tucker, Ph.D.  
Deputy Administrator  
National Organic Program

**SUBJECT:** Request to Review Use of Vaccines in Organic Livestock Production Made  
Through Excluded Methods

The National Organic Program (NOP) requests that the National Organic Standards Board (NOSB) provide recommendations on the use of vaccines in organic livestock production made through excluded methods.

The NOSB Livestock Subcommittee has requested adding to its work agenda a review of the use of vaccines in organic livestock production made through excluded methods. The subcommittee notes there may be instances when vaccines made from excluded methods are the only available veterinary solution. The USDA organic regulations permit use of vaccines that are produced using excluded methods, provided the vaccines are approved in accordance with § 205.600(a) (see § 205.105(e)). The subcommittee notes there are inconsistencies in the way certifying agents review and/or approve the use of vaccines produced through excluded methods.

We are requesting the Board's feedback about a variety of approaches that could address these inconsistencies, and your consideration of this specific instance of using excluded methods. The NOP can provide technical support, if needed, to assist the NOSB in your review, and looks forward to NOSB recommendation(s) on this topic. The NOP thanks the NOSB for proposing to evaluate this issue and for your continued commitment to supporting organic integrity.