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April 4, 2019

Ms. Michelle Arsenault, Special Assistant
National Organic Standard Board
USDA–AMS–NOP 1400 Independence Ave. SW.,
Room 2648-So., Mail Stop 0268
Washington, DC 20250–0268

Re: Docket Number: AMS-NOP-18-0071
Livestock Subcommittee Discussion Document: Use of excluded method vaccines in organic livestock production

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Livestock Subcommittee Discussion Document on use of vaccines made from Excluded Methods. The Accredited Certifiers Association (ACA) is a nonprofit educational organization, and our membership includes 58 certification agencies that are accredited by the USDA or in the process of becoming accredited.

We appreciate the time the Livestock Subcommittee has put into this topic. However, we cannot fully support any of the three possible regulatory solutions under consideration at this time. Option 1 is not ideal because of the amount of time that would pass as specific vaccines are added to the National List and the bind it would create for livestock producers in the meanwhile. Option 2 (while it is basically in line with most certifier processes currently) is not ideal either due to its broad allowance of excluded methods. Option 3, which would include a commercial availability provision for the use of excluded method vaccines, would seem to be an agreeable middle ground if the industry has come to a place where certifiers can clearly determine whether or not vaccines are made with excluded methods. This has been a struggle in the past.

Many certifiers are aware of the list of vaccines found at the following link:

https://www.aphis.usda.gov/animal_health/vet_biologics/publications/CurrentProdCodeBook.pdf

We have heard it suggested that the six-digit codes assigned to the product listings can provide clarity as to whether vaccines are produced with excluded methods. However, we were recently advised by USDA-APHIS that relying on the coded information would lead to incorrect characterizations.

Historically, certifiers have experienced difficulty obtaining the relevant information directly from vaccine manufacturers. Vermont Organic Farmers (VOF) has reported successful attempts communicating with vaccine manufacturers in order to obtain the necessary information, and a group of other certifiers are currently reviving their own attempts based on the VOF communication model. We hope that, by the time the NOSB puts forth a proposal on this topic, we will have a clearer picture regarding the overall availability of information needed by certifiers to enforce a commercial availability requirement.

We appreciate the NOSB's work on this topic and look forward to future dialog.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jennifer Cruse".

Jennifer Cruse
ACA Executive Director