Accredited Certifiers Association
PO Box 332 Port Richey, FL 34668
(844) 783-7974
www.accreditedcertifiers.org

October 3, 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-19-0038
Livestock Subcommittee Proposal: 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 Proposal on the use of vaccines made from Excluded Methods. The Accredited Certifiers Association (ACA) is a nonprofit educational organization, and our membership includes 60 certification agencies that are accredited by the USDA or in the process of becoming accredited. In fact, all USDA accredited certifiers based in the USA are represented by the ACA.

We appreciate the time the Livestock Subcommittee has put into this topic. The subcommittee identified some resources for determining whether vaccines are produced using excluded methods. However, the ACA is concerned that these resources may not have the same definition of excluded methods. The NOSB has put forth several proposals clarifying what technologies are and are not excluded methods under the National Organic Program definition, but these may not be considered excluded methods in the resources that were identified. Therefore, using these resources to identify GE vaccines may unintentionally allow for vaccines created using excluded methods identified by the NOSB. Most likely, certifiers would have to confirm directly with manufacturers that these vaccines are not genetically engineered.

In addition, the ACA requests that the subcommittee further flesh out the proposed commercial availability provision for the use of excluded method vaccines. While some certifiers have reported successful attempts in communicating with vaccine manufacturers in order to obtain the necessary excluded method information, there are concerns about the ability of the producer to determine equivalency. The apparent lack of resources available to

Accredited Certifiers Association
PO Box 332 Port Richey, FL 34668
(844) 783-7974
www.accreditedcertifiers.org

the producer to determine whether any equivalent vaccine is available is a question of concern. For example, it may be difficult for producers to determine what other vaccines that prevent the same disease are available and whether they are genetically engineered. Moreover, many organic livestock producers may not have access to modern technologies to aid them in the search of equivalent vaccines. We request that the subcommittee address the following questions: Where can the producer inquire about equivalent vaccines? Does the producer have the resources and technical knowledge to determine what is an equivalent vaccine and whether any equivalent vaccines are not produced through excluded methods?

Another potential concern is the placement of the commercial availability clause in section 205.105 instead of on the national list section 205.603 This could set a precedence for commercial availability for things listed in section 205.105.

We would propose that the NOSB deliberate more on commercial availability and consider any resources for producers to determine equivalency and 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,

Meagan Collins
ACA Coordinator