



# CALIFORNIA FARM BUREAU FEDERATION

NATIONAL AFFAIRS & RESEARCH DIVISION

2300 RIVER PLAZA DRIVE, SACRAMENTO, CA 95833-3293 · PHONE (916) 561-5610 · FAX (916) 561-5693

May 3, 2012

Via- Federal Registry.gov

**Re: Document Number AMS–NOP–12–0017; NOP–12–06  
NOSB Livestock Committee – proposal on GMP Vaccines**

Dear NOSB:

California Farm Bureau Federation (CFBF) is writing the Board regarding the proposal for the approval and use of vaccines derived from excluded methods, or GMO Vaccines, on animals. Vaccines, GMO or non GMO, are an important tool to ensure animal health. The determination of whether or not a GMO Vaccine is approved for use should be based on a number of factors including animal health and welfare, geography, climate, history, or human health.

Requiring the State or Federal Government to declare an “emergency” is not practical, or practiced for all animal health pests and diseases. For example, the State and the Federal Government have not declared an emergency for Salmonella in laying hens; however vaccines are used as a best management practice for reducing salmonella in flocks. In order for the State of California to declare an emergency, the Secretary of Agriculture must provide a justification to the Governor that a “State of Emergency” is critical to California’s safety. Many times States are reluctant to declare a pest or animal disease emergency because it can trigger a myriad of questions and concerns. A declaration gives the State additional authorities not otherwise allowed, may unnecessarily alarm the public, impact trade relations, and allow for Federal resources to assist the state. The public could become saturated with “emergency” declarations, so when there is one of major concern they may take little notice.

Emergency declarations should be reserved for truly emergency situations, as California experienced with the Exotic Newcastle disease outbreak in poultry in 2002. The National Organic Program (NOP) should provide for another way to approve the use of GMO vaccines based on the health and welfare of the animal, climate, geography, history, or the general public. The NOP could rely on the State Veterinarian, or the producer’s veterinarian, recommended use of a GMO vaccine when allowing the use in organic production.

For the reasons stated, we have concerns with the recommendations proposed by the Livestock committee regarding approval of the use of vaccines derived from excluded methods. It is not practical or generally practiced to declare a Federal or State of emergency for animal pests and diseases in order to allow the use of a vaccine from excluded methods. We ask that the NOSB look at other practical ways to approve the use of GMO vaccines on livestock.

Sincerely,

A handwritten signature in black ink, appearing to read 'R Pegg'.

Rayne Pegg  
Manager