

GMO Vaccines

EXECUTIVE SUMMARY

- Vaccines for which no non-GMO version exists can be petitioned individually and added to the National List.
- The Livestock Committee's proposal states that "information in the TR and information received from other sources in the field did not indicate that GMO vaccines were essential to organic production at this time."
- GMO vaccines should be allowed only in *bona fide* emergencies, and only when no conventional alternative is available. Language in the proposed rule should be further strengthened to ensure strong safeguards are in place to prevent misuse.

GMO Vaccines

According to the USDA General Counsel, GMO vaccines are not allowed in organic production unless they are specifically added to the **National List. Vaccines for which no non-GMO version exists can be petitioned individually and added to the National List.**

We urge the NOSB to fine tune the Livestock Committee's proposal in a way that will prevent GMO vaccines from being used in all but the most critical and legitimate emergency situations, and with adequate restrictions to prevent abuse.

According to the Livestock Committee, as stated in the proposal, "The TR does not point to a single or narrow group of problem diseases in organic livestock that are creating hardship and urgently need to be addressed with GMO vaccines," and, "A review the USDA's APHIS list of Livestock Vaccines, regulated by the Center for Veterinary Biologics, suggest that there are non-GMO vaccines available for virtually all common potential livestock sicknesses."

The only two vaccines for which no non-GMO vaccines are available are avian and bovine salmonellosis. We would like to see a more thorough discussion and analysis of these particular vaccines and the conditions they prevent. If organic producers need these vaccinations and they are indeed only available in GMO form, they could be petitioned for addition to the National List (with a comprehensive annotation limiting their use). A thorough and unbiased Technical Review should be completed for each one, rather than relying on the current TR, which deals with the whole class of GMO vaccines rather than individual materials.

In terms of other GMO vaccines, we would like to see more discussion of possible impending emergencies for which GMO vaccines would be required. Has such a

scenario occurred in the past, where farmers were forced to use a GMO vaccine? How likely is it that a much-needed vaccine will be available only in GMO form?

The Livestock Committee's proposal states that "information in the TR and information received from other sources in the field **did not indicate that GMO vaccines were essential to organic production at this time.**"

We support the comments submitted by former NOSB Chair Jim Riddle, who suggested that the NOSB should recommend that the NOP engage in an information campaign to empower producers, inspectors and certifiers with the knowledge and tools they need to prevent the use of GMO vaccines in organic livestock production. We believe this should be achieved primarily by creating environments and management techniques that discourage communicable disease.

Yet we also understand that GMO vaccines may be necessary in the future, for legitimate reasons, and believe organic farmers should be able to use them without losing their organic certification – but strong safeguards must be put in place to prevent misuse.

GMO vaccines should be allowed only in *bona fide* emergencies, and only when no conventional alternative is available. Safeguards must be set up to ensure that emergency declarations are legitimate and will protect family-scale farmers. We could imagine a situation where family-scale farmers would not need a certain GMO vaccine, but industrial-scale livestock facilities may need it to solve problems caused by the model of livestock production.

As an example, an industrial-scale dairy may need a certain vaccine because they are continually purchasing animals, rather than operating with a closed herd. "Closed herds," in dairy production, are virtually synonymous with the word "organic," and certain diseases may impact only those who do not manage closed herds. In such a case, we would not want to see a loose definition of an emergency, opening up the use of GMO vaccines, when it would benefit only industrial-scale producers and allow them to keep their organic certification while turning to common industrial practices that are not compatible with organics.

However, legitimate emergencies that would negatively impact livestock operations of all sizes, including family-scale farms, may arise in the future, for which the only option could be a GMO vaccine. We share the concerns that there may not be a big enough market for the development of non-GMO vaccines, as organic alternatives, in such emergencies, which would put organic producers at a severe disadvantage.

Livestock Committee should fine tune the language related to the emergency, to answer questions such as who can declare the emergency, and how long can the emergency last.

The NOSB should remember that unintended consequences may exist from the use of GMO vaccines. Their use should be very restricted, and rule language should ensure this.

In conclusion, we would recommend that the NOSB table the approval of GMO vaccines as a class encouraging petitions to approve the two vaccines that are currently on the market and said not to have non-GMO alternatives. And in the meantime, the Livestock Committee should clarify and strengthen the language restricting the use of GMO vaccines.