

If accredited certification agencies, like VOF are going to continue to improve our assessments of animal welfare concerns on farms, we are going to have to make judgments about the condition of care on these farms. We agree that highly trained individuals should make these judgments. And that these individuals should be using tools widely accepted as legitimate means of assessing welfare concerns. ACAs and inspectors are going to need tools like the scorecards presented by the NOSB, to make these judgments fair and consistent. These scorecards will help inspectors begin to recognize specific welfare concerns and quantify the prevalence of these problems on the farm. Without specific guidelines that are quantifiable, we are afraid that the recommendations will be too vague and difficult for ACAs to cite farmers for animal welfare non-compliances.

#### Proposal on Vaccines Derived from Excluded Methods

The NOSB recommendation on allowing GMO vaccines only in declared emergencies when no alternative vaccines exist is a practical compromise and one that our organization supports. We also strongly support the recommendation that if these vaccines are used in an emergency, that the organic status of the animal is preserved. The use of vaccines are very much in line with the overall goal of organic livestock producers who strive to prevent disease and illness in their herds and flocks.

We agree with the National Organic Coalition's comments that it may be appropriate to refine the specifics around how emergencies are declared, how long they can last, etc. We are also concerned about better understanding what criteria APHIS uses to determine whether a vaccine is genetically modified. The NOSB's recommendation is based on the assumption that only 2 vaccines are presently available only as GMO. Our support for this recommendation would change for example, if it was determined that in fact more vaccines may be considered genetically modified and that no alternatives exist.

We support the committee's efforts in addressing this issue and for coming up with a reasonable compromise to ensure that organic livestock producers have the vaccines they need should an emergency or disease outbreak occur. In general, we support the recommendation and hope to see the concerns listed above addressed.

### **Materials Committee**

#### Proposal on Research Priorities Framework

We strongly support this proposal. It would enable the NOSB to play a greater role in identifying pressing research needs in organic agriculture and organic food processing, and in widely publicizing research priorities among organizations, businesses and institutions that fund or are engaged in such research.

The NOSB is uniquely positioned to learn directly from producers, manufacturers and processors of the new knowledge, practices and products that they need to successfully run their businesses and to comply with organic standards and principles.