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National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave. S.W.  
Room 2648-S, Mail Stop 0268  
Washington, DC 20250-0268

Docket: AMS-NOP-12-0017; NOP-12-06

**RE: NOSB Materials Committee Agenda Item - Research Priorities Framework**

Dear Ms. Arsenault:

We applaud your recommendation to establish a Research Priorities Framework for prioritization of research on many topics related to the organic industry. Midwest Organic Services Association certifies over 1,400 producers and processors, and we recognize the complexity inherent in successful organic production and verification.

The National Organic Standards Board faces significant challenges in evaluating materials for inclusion on the National List. As technology advances, the number of uncertainties continues to rise. We support the committee's goals of prioritizing research needs and communicating related information to primary research funding organizations for the development of tools that can be used in organic production and for the sake of increasing knowledge that will result in sound, informed decision making. In fact, we support this evaluation framework not only for assessing the suitability of products for inclusion on the National List, but for development of the National Organic Standards as a whole.

This is especially important due to the development of biotechnology. In a growing number of cases, questions arise in relation to GMO presence or absence in the final product. At present, certifiers do not have the technical knowledge to evaluate all potential uses of GM technology and look to the National Organic Program for guidance. Currently, when questions about new GM technology applications arise, there is not reliable or clear research readily available to help certifiers make informed decisions. For example, cell fusion is used to develop male sterility for the production of hybrid seed. With this new technology, there is confusion among the organic community regarding whether there is a GMO presence in the final hybrid seed, whose parents were developed with GM technology.

Similar questions exist regarding use of GMO Vaccines. Because the GMO vaccine issue is especially timely in the context of recent NOSB discussion, we would like to focus on this concept as a topic for consideration within the proposed Research Evaluation Framework.

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Influencing the direction of research dollars and increasing the amount of research related to organic agriculture will create options for improving animal welfare on organic farms. Although non-GMO vaccines are preferred over GMO versions, non-GMO options do not exist in every case where pathogen prevention is needed. Steering research in the direction of developing viable non-GMO vaccines will help provide producers with the options they need while guaranteeing food safety within the organic production chain. A similar argument could be made regarding livestock health treatment products in general. Research related to pharmaceutical development does not occur without significant funding. Availability of research dollars, coupled with increasing demand for organic-compliant products, could change the course of materials development, resulting in a wider and more effective toolbox of allowed products that producers and veterinarians can use to care for livestock.

With regard to controversial National List Substances, primary research could prove invaluable in order to make an informed decision regarding petitioned materials. For example, if GMO vaccines were categorically disallowed, but individual vaccines could be petitioned, more primary research regarding the safety and efficacy of the product will allow for a more informed decision. Also, research could also allow for accuracy in evaluating whether the GMO vaccine in question was truly "incompatible with organic agriculture" based on the way it behaves in nature, the treated animal, and the finished product. Coming to solid decisions based on scientific research will provide ground for consensus within the organic community.

The GMO vaccine issue can be seen as crucial when evaluated using the proposed criteria for evaluating research topics.

1) The topic is persistent and chronic. Bacterial and viral infection will always occur, not on all organic farms, but on enough to understand that prevention is necessary to ensure food safety. Furthermore, new strains of microorganisms may continue to develop, requiring ongoing research. If GMO vaccines are disallowed, producers *need* non-GMO options, and these are not currently available in every case.

2) Significant challenges exist with regard to evaluation of materials in this sphere, partly because biotechnology is a new and complicated science, and partly because most producers of pharmaceutical products do not develop products with organic producers in mind. While market demand for organic products (and, in turn, NOS-compliant inputs) is growing, it is still woefully small when compared to conventional market demand. We need greater understanding in this challenging, developing area.

3) The topic is clearly controversial. The Organic Food Production Act, what we might see as the bedrock of the National Organic Program, describes GMOs in general as "not compatible with organic agriculture." However, it is not clear whether risks applicable to GMO plants and animals apply to GMO vaccines. Research can provide the answers to these questions. Producers are concerned that disallowing non-GMO vaccines will hinder their attempts to prevent illness and produce safe food. Again, research and development could produce acceptable alternatives.

4) The topic is nebulous in the sense that it may be difficult to determine where to start. Should attention be given to research and development of non-GMO vaccines, or should evaluation of the environmental effects of GMO vaccines be given priority?

5) Primary research is lacking. If individual GMO vaccines can be petitioned for inclusion on the National List, each of those will need to be evaluated using the criteria in OFPA for the review of materials.

6) The issue is clearly relevant to assessing the need for alternative cultural, biological, and mechanical methods to materials on the National List. We see the importance of assessing the need for other control methods to pathogens in lieu of using vaccines for prevention of pathogens. Also, vaccine research is relevant to the need for alternatives in the situation where only GMO vaccines are now available.

In closing, we believe the proposal for a Research Priorities Framework within the National Organic Program is a sound idea, and that it should not be limited to evaluation of National List materials. We reiterate our opinion that GMO vaccines should be given priority for evaluation within that framework.

We thank you for your work in this area and look forward to further discussion on the topic.

Sincerely,

Midwest Organic Services Association  
Certification Department