

## Livestock Committee

### *GMO Vaccines*

Avoiding genetically modified organisms is one of the major reasons consumers look to organic food, and this motivation is driving more consumers to organic as the debate grows over new approvals of GM crops and the lack of GMO labeling.

Finding out that there is a loophole in the organic standards that would allow the use of GMO vaccines will be hard for organic consumers to accept, when many of them have been looking to organic as a way to avoid GMOs. In the final rule, GMO technology is explicitly identified as an excluded method - a position that we support, with no exceptions or possible loopholes. The committee recommendation to allow the use of GMO vaccines that do not appear on the National List in certain poorly defined circumstances could quickly become a loophole and cause enormous credibility problems for the entire organic label. Therefore, we oppose this recommendation.

## GMO Ad-Hoc Committee

### *Letter to Secretary Vilsack*

Food & Water Watch supports the letter drafted by the Ad Hoc GMO committee to Secretary Vilsack. It addresses the critical concern of the organic community on issues of GMO contamination, sets a course for the Board to deal with clarifying issues around excluded methods, and asks the Secretary to acknowledge that the responsibility to prevent GMO contamination of organics should not be borne by organic, but by those who develop, use, and regulate this technology.

It is very clear that organic farmers bear the burden of trying to prevent contamination from GMOs, a technology that they are not permitted to use. It is long past time for the USDA to require that the patent holders and owners of the technology take responsibility for contamination. A letter from the Board to the Secretary of Agriculture expressing the critical nature of this issue for the organic community is absolutely appropriate and long overdue.

## Policy Development Committee

### *Conflict of Interest*

Food & Water Watch supports the Policy Development Committee's efforts to enhance the Board's existing conflict of Interest policy. Adding clarity to both the definitions and to the procedures for the Board not only guarantees consistency for this current Board, but adds guidance for all future Boards. We also support the recommendation of the Center for Food Safety in recommending conflict of interest statements from contractors or consultants who write Technical Reviews or perform other work for the Board.

## *Public Comment*

Food & Water Watch also generally agrees with the proposed public comment procedures, but objects to the adoption of the 3-minute comment period. We would prefer to see a standard 5-minute comment period that is adjusted downward (i.e., first to 4, and only to 3 minutes if absolutely necessary) as needed to accommodate all speaking requests.

The 3-minute limit on public comments is a very challenging for organizations that can only send one person to a Board meeting, given the large number of topics that many groups want to cover. This gives an advantage to those who can afford to bring multiple people to the meetings to use more public comment slots.

## Materials Committee

### *Aquaculture Petition Update*

Because there was no public document for this topic, we do not have specific comments to offer. But as the committee continues to discuss the appropriate criteria for evaluating materials that may eventually be petitioned for aquaculture operations, once aquaculture standards exist, we urge the committee to keep in mind several critical issues:

- the difference between open and closed systems when materials are being considered;
- the role of feed in aquaculture systems, especially open net pen systems, in impacting the surrounding environment;
- the potential for material inputs to serve as a crutch for poorly designed or operated systems or to compensate for overcrowded systems.

The following is the detailed comment we submitted at the November 2011 Board meeting on the discussion piece on materials for aquaculture operations. These issues are still relevant in a discussion of materials for aquaculture.

### *Comment on the National Organic Standards Board Materials Committee Proposed Discussion Document "Aquaculture Materials Review Update"*

In response to the National Organic Standards Board Materials Committee's proposed discussion document "Aquaculture Materials Review Update," please accept these comments on behalf of Food & Water Watch, a national non-profit consumer advocacy organization. Our members and supporters support organic agriculture and are very concerned with the integrity of any organic standards that are developed for seafood. Additionally, Food & Water Watch has worked for many years on fisheries management issues, including the impact of large-scale aquaculture on the environment, fishing communities, and aquatic ecosystems.

Food & Water Watch believes that not all types of aquaculture are suited for the organic