



CCOF

Advancing organic agriculture through certification, education, advocacy, and promotion.

Ms. Michelle Arsenault
Advisory Committee Specialist
National Organic Standards Board, USDA-AMS-NOP
1400 Independence Ave. SW., Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-19-0038-0001

Re: Livestock Subcommittee Proposal: Use of Excluded Methods Vaccines in Organic Livestock Production

October 3, 2019

Dear Ms. Arsenault and NOSB:

Thank you for the opportunity to comment on the Livestock Subcommittee's discussion document "Use of excluded method vaccines in organic livestock production."

CCOF is a nonprofit organization governed by the people who grow and make our food. Founded in California more than 40 years ago, today our roots span the breadth of North America. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

126 CCOF members list vaccines and other biologics in their Organic System Plan (OSP). CCOF requires producers to list all livestock healthcare products in their OSP, and producers are required to retain livestock vaccination records for at least five years.

Vaccines play an important role in maintaining animal health and are used by CCOF members to protect their animals from a myriad of pathogens, including tetanus, pinkeye, *E. coli*, coccidiosis, Marek's disease, salmonella, leptospirosis, clostridial diseases, and others. The use of vaccines can differ between operations. Some operations are at a lower risk of disease due to factors such as herd or flock size, management practices, or farm location, and may choose to vaccinate less or not at all. Despite variability in animal healthcare practices, all livestock producers must have access to vaccination as a tool that can ensure the health of their animals in the face of unexpected outbreaks or disease spread from neighboring operations.

California is currently experiencing an outbreak of Virulent Newcastle Disease (VND), a contagious and fatal viral disease that affects the respiratory, nervous, and digestive systems of birds and poultry. Southern Californian poultry producers are currently under quarantine in an attempt to stop the spread of the disease. Poultry operations must vaccinate their animals or risk fines, total loss of their

flocks to VND, or euthanasia of their flocks by authorities to stop the diseases spread. Left unvaccinated against diseases like VND, organic poultry operations could be quickly eliminated with lasting effects on the organic marketplace.

While CCOF does not support the use of excluded methods in organic production, many organic livestock producers rely on vaccines that might be made with excluded methods to ensure the health of their livestock. In order to ensure animal health and farm viability, the use of vaccines in organic livestock may be essential. Therefore, of the three options proposed by NOSB in the spring, CCOF supports the proposal to add commercial availability to § 205.105(e).

CCOF recommends NOSB work with NOP to develop updated resources for organic producers and certifiers to evaluate vaccines and determine whether they have been made using excluded methods. The complex responsibility of determining whether vaccines were produced with excluded methods should not fall on producers when their animals are at risk from a nearby outbreak or when they are experiencing an outbreak. An updated, unified list of vaccines produced without the use of excluded methods would be a useful and important resource to ensure producers and certifiers can quickly identify vaccines at times of risk. Further clarification is also needed on whether commercial availability applies to state or federally mandated vaccinations.

Thank you for your review of our comments. Please do not hesitate to contact me for further information.

Sincerely,



Peter Nell
Government Affairs Manager

cc: Kelly Damewood, CEO, CCOF, Inc.
April Crittenden, Chief Certification Officer, CCOF Certification Services, LLC
Rebekah Weber, Policy Director, CCOF, Inc.