



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-18-0071-0001

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

April 4, 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.

125 CCOF members list vaccines and other biologics on their OSP. CCOF requires producers to list all livestock healthcare products in their Organic System Plan, 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 more.

The discussion document proposes three options on excluded methods vaccines. The individual review of each vaccine before their addition to the National List, option 1, will be an arduous process for NOSB. Individual reviews would delay producers giving their livestock important healthcare tools. Option 2, to allow excluded method vaccines as a class or type of vaccines, could have unintended consequences and open the possibility for more use of excluded methods in organic production.

Allowing vaccines produced through excluded methods if there are no commercially available options to organic producers, option 3, is the middle ground offered in the discussion document. However, it is not a perfect solution. Vaccine manufacturers may not always be responsive when asked to share information about their products.

NOSB should carefully consider the impact of each option on organic livestock producers with state-mandated livestock vaccinations. For example, the California Department of Food and Agriculture requires cattle entering the state to have brucellosis vaccinations. Dairy cattle 4 months or older must have brucellosis vaccination records to enter the state. Female beef cattle 12 months and older are also required to be vaccinated against brucellosis. If a state-mandated vaccination was produced using excluded methods, organic producers could be limited in their ability to purchase out-of-state cattle and to move cattle in and out of California. Other states may also have specific state-mandated vaccination requirements.

Producers in states with mandated vaccination requirements would also be put at a disadvantage compared to other producers. Additionally, even if an organic producer was able to find a vaccine produced without excluded methods to satisfy state-mandated vaccination requirements, their state agency may not allow its use.

While CCOF does not support the use of excluded methods in organic production, many organic livestock producers rely on vaccines to ensure the health of their livestock. In order to have a safe food system, the use of vaccines in organic livestock may be essential. Therefore, NOSB should invite organic livestock producers, vaccine manufacturers, and other stakeholders to present further information on the topic at the next NOSB meeting.

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
Jody Biergiel Colclough, Interim Chief Certification Officer, CCOF Certification Services, LLC