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To the National Organic Standards Board.

Re: Docket AMS-NOP-18-0071

Comments Regarding Acceptability of Gene-Deleted Vaccines for Flocks Under the National Organic Program

It is proposed to exclude vaccines developed using any form of genetic modification from the approved list for flocks producing eggs and meat under the USDA Certified Organic Program. All USDA-approved vaccines should be acceptable under the NOP.

A live mutant gene-deleted *Salmonella* Typhimurium vaccine is widely used in the egg and broiler industries to protect immature flocks from intestinal colonization with *Salmonella* serotypes. This includes *S.* Enteritidis transmitted by the transovarial and transoviductal routes through eggs to consumers and to broiler progeny of affected parent flocks. Depriving producers of a unique vaccine for which there is no alternative will create a potential public health hazard especially for organic flocks with mandated outside access. Inevitable cases of salmonellosis traced back to organic flocks will degrade the image of the Certified Organic Seal and run counter to the objectives of the program. Disqualification of this vaccine would have dire consequences to all organic producers irrespective of species.

The only available live attenuated gene-deleted *E.coli* vaccine is outstanding in its protective effect suppressing a range of coliform diseases including airsacculitis, peritonitis and septicemia syndrome both as primary infections and secondary to exposure to viral respiratory pathogens or environmental and climatic stress. Mortality in affected flocks especially with outside access can exceed 30 percent over the lifetime of a flock since there are no options for treatment under the Certified Organic Program. Disqualification of this vaccine would result in financial loss to producers, would be antithetical to sustainability and would represent an obvious welfare issue.

There is no scientific or logical justification to exclude the administration of gene-deleted vaccines. Any decision to this effect would be based on unsubstantiated personal and uninformed opinion in pursuit of some sentimental and non-defined ideal of “organic” status. Depriving producers of these valuable and beneficial vaccines would be deleterious to both farmers and consumers and ultimately will result in negative publicity impacting the image of organic production.

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