



United States  
Department of  
Agriculture

Agricultural  
Marketing  
Service

STOP 0268 – Room 4008-S  
1400 Independence Avenue, SW.  
Washington, D.C. 20250-0200

April 16, 2003

Ms. Wendy Servoss  
Environmental Coordinator  
USDA-APHIS-WS  
6213-E Angus Drive  
Raleigh, North Carolina 27617

Dear Ms. Servoss:

This is in response to your request that the National Organic Program (NOP) rule on whether the U.S. Department of Agriculture's (USDA), Animal and Plant Health Inspection Service, Wildlife Services (APHIS-WS) Oral Rabies Vaccination (ORV) Program will have an adverse affect on organic crop and livestock operations.

We understand the ORV Program to be an emergency disease treatment for the control of rabies. As such the program is addressed under NOP section 205.672, Emergency pest or disease treatment. We further understand that APHIS-WS will typically hand bait in highly populated urban areas and will typically aerially distribute the baits in other areas at the rate of approximately 75 baits per square kilometer.

We have determined that the placement of ORV bait blocks, consisting of a genetically engineered vaccine imbedded in fishmeal bound by a polymer binding agent, on an organic operation will not have an adverse impact on that organic operation. This determination is applicable to ground and aerial distribution of ORV baits. The basis of this determination is that the vaccine is not expected to contact organic crops or to be consumed by organic livestock.

In the unlikely event that a bait block breaks and exposes a plant(s) to the vaccine, the organic producer can remove the affected plant(s) with no adverse effect on the operation's certification. This would comply with section 205.672(a). The organic status of animals feeding on the ORV bait block and not penetrating the vaccine will not be adversely affected. In the unlikely event that an animal consumes the vaccine within the ORV bait block that animal will lose organic status as provided in NOP section 205.672(b).

After reviewing documents provided by APHIS-WS, we believe there is little chance that an organic animal will consume the vaccine within an ORV bait block regardless of whether the baits are hand or aerially distributed. To further reduce the chances of livestock consumption, baits

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distributed by hand should be placed outside of areas containing livestock. When baits are aeriually distributed livestock producers can reduce the chances of livestock consumption by relocating any bait found within an area containing livestock to a point outside of that area.

Thank you for your interest in the NOP. If we can be of further assistance we can be reached at 202-720-3252.

Sincerely,

Richard H. Mathews  
Program Manager  
National Organic Program