



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: Materials Subcommittee Discussion Document: Genetic Integrity Transparency of Seed Grown on Organic Land

April 4, 2019

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Materials Subcommittee's discussion document "Genetic integrity transparency of seed grown on organic land."

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.

CCOF provides the attached comments in support of the Materials Subcommittee's continued work on genetic integrity of seed. The Materials Subcommittee should further refine and clarify its goal and recommendations for the discussion document. The discussion document does not clarify a goal (a recommended change to guidance, regulations, or instruction), summarize the previous discussion document to which this version responds, or clearly articulate how the discussion document might address genetic contamination of field corn. Therefore, NOSB should continue to refine the discussion document by establishing a clear goal and recommending steps to achieve said goal.

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

Sincerely,

A handwritten signature in black ink that reads "Peter Nell".

Peter Nell
Government Affairs Manager

cc: Kelly Damewood, CEO
Jody Biergiel Colclough, Interim Chief Certification Officer, CCOF Certification Services, LLC

CCOF's Comments on the Materials Subcommittee Discussion Document Genetic Integrity Transparency of Seed Grown on Organic Land

The following comments are based on CCOF member input, our experience offering organic certification for more than 40 years, and our certification of over 2,500 organic farms throughout North America.

1. NOSB should continue to recommend the formation of a Seed Purity Task Force.

The organic community widely commented in favor of convening a Seed Purity Task Force to examine the topic of GMO contamination. The task force could be selected from experts in the areas of organic crop production, the seed industry, organic certifiers, and other stakeholders representing all interested parties. The discussion documents and proposals on organic seed should continue to recommend the formation of a task force to assist NOSB.

2. Organic farmers should be required to retain seed samples for each lot of at-risk seed they plant.

The discussion document does not address the recommendation that organic farmers retain a sample of seed used for crops at risk of GMO contamination. CCOF supports requiring farmers to retain samples for at least 18 months as part of basic recordkeeping, contamination avoidance, and due diligence. Requiring producers to retain a sample of seed for crops at risk of GMO contamination is a simple, cost-effective tool for certifiers to verify compliance with the standards at a low cost to organic farmers. A seed sample requirement is principally the same as other recordkeeping and best practices requirements. Therefore, it could be quickly adopted and implemented through the certification process.

3. A testing program could limit the available varieties in the short term but could increase organic seed varieties and usage over time.

A testing program could limit the varieties of seed available to organic producers but in the long term could lead to increased organic seed varieties and usage. If enough lead time is given and robust support is given, organic seed usage may increase if the total number of varieties available is limited. The Seed Purity Task Force could assist NOSB in determining the available germplasm, breeding programs and priorities, and the impact genetic testing would have to organic producers.