



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-18-0029-0001

Re: Materials Subcommittee: Genetic integrity transparency of seed grown on organic land proposal

October 4, 2018

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Materials Subcommittee's proposal "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 NOSB's continued work on the genetic integrity of seed in organic production. Overall, CCOF supports the initial focus on field corn seed and not requiring specific types of testing or labs for testing of genetic contamination of seed. CCOF also supports the requirement that organic farmers retain seed samples; however, seed samples should be retained for 18 months instead of 12 months because it would allow for additional time to investigate and test seeds for contamination.

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
Policy Specialist

cc: Cathy Calfo, Executive Director/CEO
Kelly Damewood, Director of Policy and Government Affairs
Jake Lewin, President, CCOF Certification Services, LLC

CCOF's Comments on Genetic Integrity Transparency of Seed Grown on Organic Land

The following comments are based on CCOF's member input, our experience offering organic certification for more than 40 years, and our certification of over 2,300 organic farms throughout North America. CCOF provides the following comments on the proposed items.

6. The level of purity must be included on the seed tag, or for bulk shipments, on the invoice or other sales document.

CCOF supports the inclusion of purity level on seed tags, sales document, or a seed datasheet. Seed labels or seed datasheets with purity labeling would protect producers from inadvertently using contaminated seed and ensure that producers have records to demonstrate their compliance with the prohibition of GMOs in organic production.

15. The certifier will keep track of this information and send this information to a central database, without the farmer or seed supplier information. This information would help the organic community gain a better understanding of the levels of seed purity from GE contamination used on organic land, as well as regional differences in seed production.

CCOF supports the creation of a central database to track seed purity and transparency in seed purity levels. Certifiers could include seed purity information in their data reporting to the National Organic Program to save expenses in the development and implementation of a central seed purity database.

17. Organic farmers should retain samples of each lot of seed they planted for at least one year after their crop grown from this seed has been sold.

CCOF supports requiring organic farmers to retain a sample of seed used for crops at risk of GMO contamination 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.

Seed samples should be retained for at least 18 months instead of a year. Expanding the seed retention period will allow for additional time to investigate and test seeds for contamination. If certifiers, NOP, or the California State Organic Program find a positive GMO trait in an organic product, an investigation is conducted to trace back through the supply chain to understand where the contamination occurred.