



CCOF

Organic Certification

Education & Outreach

Political Advocacy

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-15-0085; NOP-15-16

Re: Materials/GMO Subcommittee: Excluded Methods Terminology Discussion Document and Proposal

April 13, 2016

Ms. Michelle Arsenault and NOSB:

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the Materials/GMO Subcommittee's Excluded Methods Terminology Discussion Document and Proposal.

CCOF (California Certified Organic Farmers) is a nonprofit organization founded in 1973 that advances organic agriculture for a healthy world through organic certification, education, advocacy, and promotion. CCOF is based in Santa Cruz, California, and represents more than 3,000 certified organic members in 42 states and three countries.

CCOF supports the three motions that will move the guidance forward: to approve the definitions; approve the principles and criteria; and adopt the Terminology Chart.

CCOF commends the Materials/GMO Subcommittee for taking up the difficult task of updating the definition of excluded methods and developing guidance on how to classify new genetic engineering technologies. As these technologies emerge, the organic community's need for updated terminology and guidance becomes more urgent.

Excluded Methods Proposal

Definitions:

The defined terms will further clarify that genetically engineered crops are not allowed in organic production and will also lay the groundwork for assessing related technologies in the future.

Principles and Criteria:

In general, CCOF supports the listed criteria, but has a concern that the word *invasion* in the first bullet point does not have a precise scientific meaning. *Invasion* has a variety of definitions in medicine—mostly related to the action of cancerous cells—and is defined in biology as “the process by which species (or genetically distinct populations), with no historical record in an area, breach biogeographic barriers and extend their range.”¹ A more precise term might be “disruption of genome integrity.”

¹ McGraw-Hill Dictionary of Scientific & Technical Terms, 6E. S.v. "biological invasion." Retrieved April 12 2016 from <http://encyclopedia2.thefreedictionary.com/biological+invasion>



Terminology Chart:

The chart is a useful summary of the technologies in question. It might be worthwhile to specify language about how and when the chart will be updated with new technologies.

Excluded Methods Terminology Third Discussion Document

The fact that genetic manipulation within an organism's genome that cannot be detected is now possible vastly complicates enforcement of regulations prohibiting excluded methods. Maintaining master lists of such crops and products, as well as specifying that items on these lists are excluded from organic production, may be the only practical way to oversee their use in organic production. A challenge might be to identify an official source to house the list, as well as to ensure that the list is updated regularly.

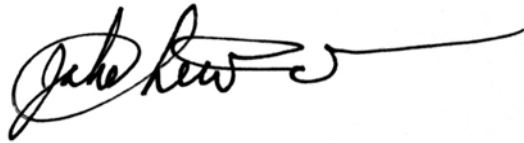
CCOF acknowledges and applauds the great effort made by the Materials/GMO Subcommittee to update these essential concepts in the organic regulations.

Thank you for taking the time to review our information. Please contact us for further information or clarifications.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC

