



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: Discussion Document on Next Steps for Improving Seed Quality

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 Discussion Document on Next Steps for Improving Seed Quality.

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 joins the Subcommittee in urging NOSB to continue developing policies that will ensure organic farmers have access to a consistent supply of high-quality seed free of transgenic contamination.

Organic is non-GMO and more. Organic is the only system that can offer a seed-to-table process that excludes GMOs. Organic standards prohibit the use of GMOs. In addition, the organic certification process ensures that organic producers prevent inadvertent contamination. CCOF has been performing a growing number of GMO tests under the mandated residue testing requirements for ACAs. If a test result raises cause for concern, then the organic certification process requires a certifier to investigate the supply chain and trace the cause of contamination. The investigation may look as far down the supply chain as the seed used on the farm. Other food labels that are intended to communicate the non-GMO characteristic of foods do not provide as thorough monitoring as the organic requirements.

GMO technology continues to rapidly evolve and expand—essentially unchecked and poorly regulated. Therefore, the organic certification process must evolve to ensure it has every tool available to exclude GMOs in organic production and prevent inadvertent contamination.

The most critical advancement for organic certification related to GMOs is the development of a seed purity standard because the greatest risk of contamination likely exists in the seed. If a contaminated seed is used, then the presence of GMOs could be found at various levels of the supply chain. Therefore, testing seed is necessary to ensure that, from the start, organic producers are not at risk for inadvertent contamination and meet the consumer expectation that foods labeled organic are non-GMO. Each of the suggestions A-D made by the Subcommittee present an important task that will move the effort forward. CCOF recommends that suggestion B, establish a USDA Seed Purity Advisory Task Force,



be implemented first. CCOF also recommends that the USDA Seed Purity Advisory Task Force be assigned to develop processes to implement all of the suggestions, including:

1. Consider phasing in a requirement that certifiers require verification that at-risk seed (seed of crops with GMO counterparts) is non-GMO.
2. Gather data on the incidence of GMO presence in nonorganic seed used in organic production. Additionally, it would be helpful to gather data on all possible sources of contamination (seed, pollen transfer in field, or commingling during harvest, transport, and packaging) to better inform prevention strategies.
3. Design a feasibility study on establishing a threshold for GMO presence in nonorganic seed used for organic production.
4. Strengthen implementation of the organic seed requirement in the federal standards. CCOF is identifying baseline levels of organic seed use for all of its growers and plans to use the information to increase organic seed use.
5. Initiate a pilot soybean testing program.


CCOF commends the Subcommittee for moving these issues forward and looks forward to reviewing a seed purity proposal in upcoming NOSB meetings.

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

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC

