



CCOF

Organic Certification

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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-17-0057-0001

Re: Materials Subcommittee: Protecting the Genetic Integrity of Seed Grown on Organic Land Discussion Document

April 4, 2018

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Material Subcommittee's discussion document "Protecting the Genetic Integrity 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 responses and recommendations on the genetic integrity of seeds. Most importantly, certifiers should require producers to retain a sample of seed used for crops at risk of GMO contamination for at least 18 months as part of basic record keeping, contamination avoidance, and due diligence. If certifiers, NOP, or the California State Organic Program (SOP) find a positive GMO trait in an organic product, then certifiers need to trace back through the supply chain to understand where the contamination occurs and ensure that producers mitigate for future issues. If producers do not retain a sample of seed, then certifiers cannot determine if the contamination occurred at the seed level.

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. A basic seed sample requirement is principally the same as other record keeping and best practice requirements. Therefore, it could be quickly adopted and implemented through the certification process.

Thank you for your careful review of our comments. Please contact me if you would like further information.

Sincerely,

Kelly Damewood
Director of Policy and Government Affairs

cc: Cathy Calfo, Executive Director/CEO
Jake Lewin, President, CCOF Certification Services, LLC

CCOF's Comments on the "Protecting the Genetic Integrity of Seed 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.

- a. Should we move to quantify the extent of GMO contamination in order to better understand the scope of the problem? How could this be accomplished?

The organic community widely commented in favor of convening a Seed Purity Task Force to examine the topic of GMO contamination. NOP should initiate the task force to discuss ideas such as adding additional questions to the USDA Census of Agriculture and surveying seed users through the Organic Seed Alliance's State of the Seed report.

NOSB should also be aware that the California SOP is doing some GMO testing; while the testing program has yet to demonstrate the scope of the problem, its test results could be informative in the future.

- b. Should a requirement be in place establishing a seed purity threshold for purchased seed (either organic or nonorganic, or both) planted on organic land? If so, what should the threshold be? How will that threshold vary with crop?

NOSB should consider a seed purity standard in the future. NOSB's top priority should be ensuring that certifiers can trace issues through the supply chain by recommending that producers retain a seed sample of at-risk crops for at least 18 months.

- c. Should there be an approved list of tests, and/or testing laboratories, for tracking the presence of GMO in seed and/or crops?

A prescriptive list could lead to inefficiencies in the system because methodologies and laboratories evolve over time. Seed suppliers, producers, product buyers, and certifiers should routinely test so that stakeholders can track the source of GMO contamination events down the supply chain. Routine testing will also establish baseline data. Testing methods should be disclosed with results available to stakeholders.

- d. Should there be an approved method of sampling for GMO traits? How much of a seed or crop should be tested to provide confidence that the entire lot is likely to be GMO free?

CCOF strongly recommends that producers retain a seed sample for at least 18 months. This would allow certifiers to more readily trace contamination issues back through the supply chain. Requiring producers to retain seed samples could be implemented without significant rule change. In most cases, the testing of seed samples would be performed by the certifier and at the certifier's expense. NOSB could recommend a protocol that addresses details such as how much seed to retain for which crops or it could allow certifiers to develop workable protocols based on consultation with reputable labs. Requiring producers to retain seed samples is a low-cost practice that would allow stakeholders to effectively gather data and investigate contamination issues.

- e. Would a seed label statement indicating the percentage of GMO traits detected by an approved testing regime, be sufficient in providing the information needed by the purchaser of the seed? No detectable level of GMO traits, .1% or other levels are examples that could be provided.

Yes, seed labels should indicate the percentage of GMO traits because it would ensure that producers do not inadvertently plant contaminated seed. It would also ensure that producers have records, e.g. seed packets, to demonstrate compliance with the standards.