

OTA Position on the Labeling of USDA NOP Certified Products and “Non-GMO” Claims

Adopted by the Organic Trade Association Board of Directors Tuesday, May 20, 2014

OTA believes that the optimal solution for U.S. agriculture is organic production, including all attributes of organic – biodiversity, resilience, environmental stewardship, non-toxic pesticides, and non-GMO production.

OTA believes that third-party certification under the USDA National Organic Program (NOP) is all that is needed to demonstrate non-GMO production. OTA prefers the use of the USDA Organic seal and “certified organic by....” as the primary and sole messaging on organic products regarding the absence of GMOs, bioengineering, or other excluded methods associated with genetic engineering.

Consumers are looking for a variety of attributes associated with organic production, and the use of multiple seals may confuse the consumer. Ensuring that USDA NOP certification clearly represents all attributes, including non-GMO practices, is critical to the future of organic agriculture.

- As a public and transparent certification system, OTA believes that the USDA National Organic Program provides the best assurance of enforcement, conflict-free verification, and public participation.

OTA believes that third-party certification under USDA NOP as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food groups)” is sufficient to substantiate a claim that a product is non-GMO. OTA supports the position that organic products do not need additional third-party verification to support claims regarding the absence of GMOs. However, OTA also recognizes that each company may need to respond to competitive pressures and consumer needs, therefore OTA does not oppose the decision to voluntarily seek out additional third-party non-GMO verification.

- OTA believes that the labeling term “GMO-free” can be potentially inaccurate. The term that has come to be associated with the USDA organic label *process* claim is “non-GMO” because the organic regulations require that no GMOs may be used in the production of organic agricultural products. Therefore, OTA recommends that the term “non-GMO” or other similar terms be used. Examples of similar phrases include, but are not limited to, “produced without GMO ingredients,” “made without the use of GMOs,” and “contains non-GMO ingredients only.”
- To avoid consumer confusion, OTA does not support claims declaring “non – GMO” where there is no comparable GMO product in the marketplace. However, OTA recognizes that each company may need to respond to competitive pressures and consumer needs.

Currently the burden of avoiding contamination falls solely on organic producers and handlers. OTA supports ongoing development of protections to prevent contamination of organic products, prevent economic loss to organic farmers, and strict regulation of genetically engineered crops and animals.

From OTA's existing GMO Policy:

- OTA shall advocate for policies that assign the cost of contamination prevention and market loss to the developers of GMO technology.
- OTA shall bolster organic as the gold standard by advocating for continuous improvement of the organic practice standard.
- OTA shall adopt policy positions that strengthen the organic standards to minimize GMO contamination and increase enforcement on the prohibition of the use of GMO crop varieties while minimizing the negative impact to farmers.
- OTA recognizes the critical role of seed in the supply chain, and shall advocate for policies that secure a seed supply to the organic sector that is free of GMOs. To that end:
 - OTA shall advocate for a seed purity standard
 - OTA shall advocate for more robust germplasm repositories for non-GMO seed
 - OTA shall advocate for re-emphasis of classical plant breeding.

[OTA's Complete Position on GMOs](#)