



October 7, 2015

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So., Ag Stop 0268  
Washington, DC 20250-0268

**Docket:** AMS-NOP-15-0037

**RE: Materials Subcommittee – Prevention Strategy Guidance for Excluded Methods (Proposal)**

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Materials Subcommittee's Proposal on Prevention Strategy Guidance for Excluded Methods. The use of GMOs is prohibited in organic production and handling, yet organic producers and handlers face significant challenges given the proliferation of GMOs in the environment and the potential for adventitious contact with GMOs. Previously, reported financial losses from GMO contamination of organic crops had largely been anecdotal. However, recent data released from the USDA's National Agricultural Statistics Service (NASS) in its 2014 [Organic Survey](#) provides the first quantitative accounting for losses due to GMO contamination over the last few years.

For the first time ever, the National Survey asked questions about losses to organic operations from contamination by GMOs. The survey indicates that from 2011-2014, 87 organic operations reported total losses of about \$6.1 million in crop losses from GMOs, or about \$70,000 per farm affected. That's up from just nine farms with average losses of about \$7,600 from 2006-2010. The USDA data clearly speaks to the external pressures that organic operations face, a reality that must be carefully considered and addressed as we move forward. It also speaks to the importance of NOSB's work on the topic of GMOs.

### **Summary of OTA's Position**

The Organic Trade Association (OTA<sup>1</sup>) strongly supports the efforts of the Materials Subcommittee on providing recommendations regarding the best management practices for prevention of unintended GMO presence. OTA believes that guidance for GMO avoidance from the U.S. Department of Agriculture's (USDA's) National Organic Program (NOP) will reflect USDA's commitment to enforcing the requirements of the regulation, and provide organic producers and handlers with a useful USDA-recognized tool to further mitigate GMO presence in organic products. OTA supports this proposal, and we urge the full Board to pass the recommendation as written at this fall 2015 meeting.

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<sup>1</sup> OTA is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect the growth of organic trade to benefit the environment, farmers, the public and the economy.

**We offer the following more detailed comments:**

OTA thanks the subcommittee for its continued work on the topic of GMOs and for recognizing the comments OTA submitted for the spring 2015 meeting. We acknowledge and greatly appreciate the revisions made to incorporate the Organic System Plan (OSP) and we're very pleased to see the subcommittee acknowledge that certifiers may need additional guidance from NOP on GMO testing. OTA strongly agrees. Testing is one of the most definite and effective tools ACAs can use to evaluate whether an organic operation has adequate measures in place to prevent commingling with non-organic GMO crops as well as intentional or unintentional contact with GMOs.

As stated in Appendix A of the proposal, although NOP guidance on pesticide residue testing is available and USDA resources for GMO testing in organic feed do exist, further guidance on GMO testing of other crops for human consumption is greatly needed. Consistent with NOP's guidance on pesticide residue testing, it is extremely important that certifiers also have guidance offering clear and consistent sampling and testing protocols for GMO testing. This will greatly assist ACAs efforts to accurately assess the efficacy of an organic operation's system for ensuring that GMOs do not come in contact with organic product. The guidance could also be used by organic producers and handlers to help assist in consistent sampling and testing procedures across the supply chain.

**Conclusion**

NOSB's continued work on the topic of GMOs is paramount. OTA continues to be very supportive of moving recommendations forward to NOP that will improve the practices used to keep GMOs out of organic seed, feed and crops. We believe it is in the best interest of the organic sector for NOP to include guidance in the NOP Handbook helping farmers and handlers prevent GMO contact with organic products, and assisting ACAs assess the efficacy of an organic operation's GMO contact prevention plan.

We are fully in support of the Materials Subcommittee proposal on GMO prevention strategies, and we urge the full Board to approve the proposal as written at this meeting.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,



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Organic Trade Association

cc: Laura Batcha  
Executive Director/CEO  
Organic Trade Association