Organic = NonGMO
...and a whole lot more

2:00-3:15 P.M.

Moderator: Gwendolyn Wyard  Regulatory Director, Organic Standards & Food Safety, OTA

Courtney Pineau  Associate Director, Non-GMO Project

Johanna Mirenda  Policy Director, PCO

Bethany Davis  Director of Regulatory Affairs, FoodState

All Things Organic Conference presented by Organic Trade Association
Organic = Non-GMO, and a whole lot more!

Gwendolyn Wyard
Regulatory Director
Organic Standards & Food Safety
Today’s Panelists

**Non-GMO Project**
- **Verification:** Helping to Build a Non-GMO Future
  - Courtney Pineau
    - Assistant Director
    - Non-GMO Project

**Pennsylvania Certified Organic**
- **Non-GMO Requirements:** Under the National Organic Program
  - Johanna Mirenda
    - Policy Director
    - Pennsylvania Certified Organic

**MegaFood**
- **Brand Perspective:** on Organic and Non-GMO Seals
  - Bethany Davis MS
    - Regulatory/R&D Project Lead
    - FoodState Inc
Organic fruits and vegetables are grown without synthetic pesticides or fertilizers
- 2010: 39%
- 2011: 31%
- 2013: 30%
- 2014: 30%

Organic foods are produced without the use of antibiotics or synthetic hormones
- 2010: 35%
- 2011: 33%
- 2013: 29%
- 2014: 27%

Foods labeled as “100% organic” and using the “USDA Organic” seal contain all organically produced ingredients
- 2010: 18%
- 2011: 22%
- 2013: 22%
- 2014: 24%

Organic foods are not genetically engineered
- 2010: 17%
- 2011: 22%
- 2013: 22%
- 2014: 22%

Organic food products do not contain artificial ingredients
- 2010: 25%
- 2011: 21%
- 2013: 21%
- 2014: 21%

Animals used in the production of organic foods are treated humanely, fed an organic diet and not raised in confinement
- 2010: 24%
- 2011: 22%
- 2013: 22%
- 2014: 20%

Increasing importance from 2011 to 2014

Increasing importance that OG = Non-GMO

Trend data: 2010 through 2014 for select attributes
Majority (63%) look for “organic” on labels; one-third or less seek GMO-related terminology.
In December 2013, OTA convened a task force to focus on protecting and promoting organic products as a gold standard of non-GMO choices.

Develop comments to FDA on its draft guidance on voluntary claims indicating whether foods have been produced without the use of “bioengineering.”

Ensure that organic certification and corresponding labels remain the gold standard for non-GMO verification.

Comments were submitted to FDA on preferred “non-GMO” terminology and a retailer/consumer education toolkit was created.

OTA’s Board of Directors adopted a position on the Labeling of USDA NOP certified Products.
OTA supports the position that USDA organic certification is sufficient and organic products do not need additional third-party verification to support claims regarding the absence of GMOs.

OTA also recognizes that each company may choose to seek out additional voluntary 3rd party non-GMO verification.

Review of both the Non-GMO Project and NOP standards reveals substantial overlap between the non-GMO requirements. OTA drafted comments with the goal of reducing duplicative efforts.

Request: Non-GMO Project honor the strict requirements of the OG regulations and the rigorous certification process enforced by USDA, build off the work that certified organic companies are already doing, and accept the NOP certificate as supporting documentation for all traceability and segregation requirements.
Thank You!

Gwendolyn Wyard
Regulatory Director, Organic Standards and Food Safety
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HELPING BUILD A
NON-GMO FOOD SUPPLY

Courtney Pineau, Associate Director
OVERVIEW

- Origins of the Non-GMO Project
- Building a Non-GMO Food Supply
- Non-GMO Project Overview
- The Non-GMO Project and Organic
- Developing Collaborative Solutions
Origins of the Non-GMO Project

Proliferation of self-made non-GMO claims—very confusing for shoppers and retailers.

A need for a market-based approach that would drive demand for non-GMO products.

Increasing evidence of GMO contamination in organic products.

Ongoing testing and an industry-wide threshold was recognized as a critical solution.
Our Common Goal: Protecting our Non-GMO Food Supply

- GMO agriculture is having detrimental impacts on farmers
  - Genetically engineered crops were planted on 169 million acres in 2013, about half of U.S. land used for crops
  - As of 2011 5.4 million acres of organic crops were planted
  - 2014 survey from Food and Water Watch showed more than 30 percent of organic farmers have experienced contamination from GMOs
  - In the same survey, 67 percent planned to delay planting corn this year so their crops would pollinate later than their neighbors’ GM corn
- Building demand for both non-GMO and organic products is critical to the well-being of our food system
Non-GMO Project

Voluntary market-based strategy for preserving and building our Non-GMO food supply

- Consensus-based standard focused exclusively on GMO avoidance
- Independent non-GMO verification
- 3rd party non-GMO label
Core Components of the Standard

**TESTING**
All major GMO risk ingredients must be tested prior to use in a Verified product and be compliant with the .9% action threshold.

**SEGREGATION**
Segregation requirements ensure that, once tested, material is protected from contamination throughout the manufacturing process.

**TRACEABILITY**
Traceability measures ensure that all high-risk inputs are tracked through to the final product.
Approach to Testing

- Comprehensive process-based approach that covers GMOs and much more
- GMOs are an excluded method
- Testing may be done as part of the 5% testing requirement, and when contamination is suspected

- Stringent testing-based approach that specifically focuses on GMOs
- “Action” Threshold of 0.9%
- Ongoing, all major risk ingredients must be tested

Building our non-GMO food supply
Commitment to Organic

The Non-GMO Project Standard:

- Is designed to honor the NOP’s excellent guidelines for traceability and segregation and build off of the work that certified organic companies are already doing
- Requires a simplified sampling and testing plan for the feed of organic livestock products (2.7.2.1.)
- Honors organic inspections for organic livestock products (2.7.4)
- Allows for the determination of Non-GMO Project compliant status of micro and minor ingredients based on organic certification (Variance #5)
Commitment to Organic

In external communications and activities:

- The Project has worked with the organic community to ensure that all copy on the Project’s websites and written materials is accurate and supportive of organic.
- The Project is working with an industry working group on tools and resources to ensure that non-GMO can be a stepping stone to organic.
- There is a deep commitment to supporting all meaningful strategies that protect a non-GMO food supply and provide consumers an informed choice about genetically engineered ingredients.
Going Forward

Based on the most recent public comment period we are considering the following suggestions:

- Allowing unverified defining ingredients without testing if they are certified organic and not major ingredients
- Honoring the organic certificate for the segregation and traceability requirements of the Non-GMO Project’s Standard.
QUESTIONS?

Courtney Pineau
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NON-GMO REQUIREMENTS UNDER THE USDA NATIONAL ORGANIC PROGRAM

Johanna Mirenda, Policy Director
Organic regulations prohibit GMOs

7 CFR §205.105

…To be sold or labeled as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)),” the product must be produced and handled without the use of…

(e) Excluded methods…

A variety of methods used to genetically modify organisms or influence their growth and development by means that are not possible under natural conditions or processes and are not considered compatible with organic production. Such methods include cell fusion, microencapsulation and macroencapsulation, and recombinant DNA technology (including gene deletion, gene doubling, introducing a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology). Such methods do not include the use of traditional breeding, conjugation, fermentation, hybridization, in vitro fertilization, or tissue culture. (7 CFR §205.2)
Organic regulations prohibit GMOs

AT EVERY FARM

✓ Never GMO seed
✓ Never GMO feed
✓ Management practices to prevent GMO drift
✓ Physical barriers to prevent contact with GMOs
✓ Segregation and identification
✓ Includes storage and transportation
Organic regulations prohibit GMOs

**IN EVERY INGREDIENT**

- Every permitted non-organic ingredient and processing aid must be non-GMO
- Even minor ingredients (e.g. yeast, vitamins)
- Even “Made with Organic” label category
- Traceability
Organic regulations prohibit GMOs

**USING TESTING AS A TOOL**

- Certifiers must perform periodic residue testing on at least 5% of certified operations annually
- Prohibited residues include GMO and pesticides
- Used as deterrent from prohibited practices
Organic regulations prohibit GMOs

**OR ELSE!**

✓ Every GMO suspicion or detection leads to investigation

✓ Inadequate prevention measures are grounds for non-compliance

✓ Intentional use of GMOs can lead to loss of certification and financial penalties
Organic regulations prohibit GMOs

AND SO MUCH MORE

- Protect natural resources and biodiversity
- Maintain or improve soil and water quality
- Livestock grazing requirements and organic feed
- Never toxic pesticides or fertilizers
- Never livestock antibiotics or growth hormones
- Never artificial preservatives or flavorings
Thank You!

Johanna Mirenda
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Brand Perspective on Organic and Non-GMO Seals

Bethany Davis M.S.
Director of Regulatory Affairs
MegaFood
The FoodState Mission

We are in the business of improving lives by staying true to the intention of food. We do that by supporting two great brands.

MegaFood®

Fresh From Farm To Tablet™

INNATE®

[Restoring Deeper Connections]

FoodState

Mastering the art of whole food supplements since 1973.
Third Party Seal Value

• Communicates core values to consumers
• Marker of quality
• Evidence of adherence to federal regulations
• Simple, easy way for consumers to make buying choices
USDA Organic

• Rich history, revolutionized the ingredient industry. Greatly reduced demand and prevalence of:
  – Petroleum-derived Ingredients
  – Harsh Solvents
  – Undesirable Additives

• Consumer awareness of the concept that Organic = Quality or “Healthier”. Public lacked (and still lacks) a deeper understanding of the National Organic Standard.

• Confusion over whether Organic speaks to the GMO issue
Organic Seal

• Non-GMO
• Soil Health
• Environmental Stewardship
• Public Health
• Animal welfare standards
• Transparent Labels
• Complete traceability of products without the use of toxic fertilizers or pesticides
• Species diversity
• Absence of artificial ingredients (colors, flavors, preservatives)
Non-GMO Project Verification

• Newcomer to the space (~5 years)
• Extremely effective marketing strategies
• Raising much needed awareness on a complex issue
• Drawing even more awareness of quality and interest in food production among consumers
Brand Considerations

• Both seals require significant consideration in product formulation, costing, positioning etc.
• Both seals represent a boost in value and price point.
• Surprisingly, some ingredients are incompatible with both programs.
• Some brands are being forced to choose between seals (Why? Because consumers are demanding it).
• Poses a concern for industry – a concern FoodState wanted to become involved with solutions around.
Industry-Led Working Group

• Non-GMO Dietary Supplement Working Group
• Looking at trends – Non-GMO is seen as a more important issue than “Natural” or “Local”
• Working to facilitate brands in acquiring and obtaining ingredients compatible with both programs.
OTA Task Force

• “Organic = Non-GMO and So Much More” Communications Sub-Committee.
  – Created Facts Sheet – breaks down the basics of the Non-GMO issue for OTA members, so you can inform your consumers.
  – FAQ Document – Clears up confusion around NOP GMO testing, verification and claims
  – Infographic
#OrganicFestival

NON-GMO AND SO MUCH MORE

**Organic = Non-GMO**

1. GMOs are **prohibited** during the production (farming) AND handling (processing) of certified organic products.

2. Certified organic farmers **must not use genetically modified seed**, and they must have procedures in place that prevent GMO drift from adjacent farms.

3. Certified handlers (processors) must have practices in place to separate organic ingredients and products from non-organic (potentially GMO) forms during receiving, processing, storage and shipping.

...and ORGANIC also means so much more:

Organic food and farming supports the health of people and our planet in so many meaningful ways. Choose organic to avoid toxic pesticides and other harmful chemicals and to steer clear of artificial colors, flavors, and preservatives. Organic farming practices support animal health and welfare with practices like cage-free living and antibiotic avoidance.
How Can These Materials Be Used?

• Reference material for marketing and customer service
• Build content into sales decks
• Repurpose content to help communicate product value
• Push out on social media – a tool to tell your brand’s story and engage consumers!
• Educate retailers in the aisle, via email/webinar/etc.
What is Needed?

- Brands – Tell your story!
- Deep retailer understanding of the two seals and how they can work synergistically
- Consumer education on the benefits and true meanings of each seal
- Continued cooperation and support between The Project and the OTA
- Continued efforts by industry to share resources and work together to create products with integrity
- Innovation of ingredients that will become solutions for those who want to attain products with both seals
OTA Non-GMO Toolkit Will Help!

- Fact Sheet non-GMO verification under NOP
- Q & A on non-GMO verification under NOP
- Quick Tips: Organic is non-GMO and more!
- OG=Non-GMO Infographic

No other label offers more in terms of benefits and assurance that foods are grown and produced with such care!

To learn more about the benefits of buying organic products, checkout:

ota.com/organic/gmos.html
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Questions?

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