



THE CENTER FOR FOOD SAFETY

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National Organic Standards Board
ATTN: Ms. Ann Michelle Arsenault, Special Assistant
USDA-AMS-NOP, 1400 Independence Ave. SW
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

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Center for Food Safety Comments to the National Organic Standards Board

The Center for Food Safety (CFS) is a non-profit membership organization that works to protect human health and the environment by curbing the proliferation of harmful food production technologies and by promoting organic and sustainable agriculture. Our list of True Food Network members has rapidly grown to include over two hundred thousand people across the country that support organic food and farming, grow organic food, and regularly purchase organic products.

Our comments address the following issues: GMOs in organic, GMO vaccines, carrageenan, inerts, conflict of interest, animal welfare, and aquaculture.

Ad Hoc GMO Committee—Letter to Secretary on GMOs

The Center for Food Safety is pleased to see the National Organic Standards Board (NOSB) asserting its authority to directly communicate to U.S. Department of Agriculture (USDA) Secretary, Vilsack, with respect to serious public concerns raised to the Board about GMO contamination of organic. We fully support the Board's letter to the Secretary which emphasizes that "the USDA's actions to date on genetically engineered crops have been insufficient to protect the organic industry."

CFS counts itself among the many groups and individuals who have been repeatedly raising concerns about GMO contamination of organic since the institution of the Organic Rule in 2002. While we appreciate the establishment of an NOSB Ad Hoc GMO Committee to help organic producers and handlers avoid contamination across the supply chain, we also strongly believe that GMO technology developers and users must be held accountable to prevent contamination of organic.

No well-established scientific evidence exists to demonstrate that contamination can be prevented when farmers use GMO technology and that 100 percent containment in open air agriculture can be achieved. Yet, scientific evidence does exist that explains how GMOs cannot be recalled once released into the environment.¹ This is troubling news for organic farmers. Without USDA imposed restrictions and limitations on GMOs, organic growers remain largely unprotected from contamination by GMO crops that have been deregulated and commercially grown. This lack of protection ensues even despite the good faith efforts of farmers, and the associated expenses they incur to protect the organic integrity of their crops. Moreover, because USDA has never mandated restrictions on any GMO crop, there is little empirical evidence to demonstrate how best to prevent contamination. Although we also strongly agree with the Committee's assessment that "the responsibility to prevent GMO contamination of organics is shared by those who develop, use, and regulate this technology," we believe that USDA's policy of allowing unrestricted GMO deregulation makes it nearly impossible to prevent GMO contamination of non-GMO crops and seed.

The organic food industry already shoulders a large and unfair burden to prevent contamination from a technology that provides them with no benefits and only costs. It is time for the USDA to step up to the plate and require those who profit from GMOs to demonstrate how contamination prevention is possible, and to require it. This includes instituting a moratorium on the approval and planting of new GMO crops, unless and until GMO contamination is prevented through mandatory regulatory measures. It would help ensure that those who choose to *not* use GMO technology can freely do so without the threat of contamination or suffering market and livelihood losses. For crops already in unrestricted commercial production, it is incumbent upon USDA to assess where contamination occurs, require restrictions, and assign liability to the GMO patent holder. In the interim, USDA should also determine the best management practices to mitigate GMO contamination and the associated economic harms to organic growers. Such efforts would go a long way in assuring organic consumers that the government is receptive to their desire to eat organic food, free from GMO contaminants.

As the Ad Hoc Committee's letter aptly points out, "USDA actions are critical to the integrity of the organic seal and consumer confidence." We urge the NOSB to approve the Committee's letter and send it to the Secretary at the earliest opportunity.

Livestock Committee—GMO Vaccines

CFS does not support the Livestock Committee's draft recommendation as written.

We oppose the use of GMO technology in organic production systems because we believe that the novel and unproven technology is incompatible with organic principles and practices. In the NOP Final Organic Rule, GMO technology is explicitly identified as an

¹ Marvier, Michelle & Rene C. Van Acker. (2005). "Can Transgenes be kept on a Leash?," *Frontiers in Ecology and the Environment*, 3(2): 96-106.; Altieri, Miguel. A. (2005). "The Myth of Coexistence: Why Transgenic Crops are not Compatible with Agroecologically Based Systems of Production," *Bulletin of Science, Technology & Society*, 25(4): 361-371.