

Public Comment to the NOPB GMO ad-hoc subcommittee

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I am providing comment on behalf of Forage Genetics International, LLC (FGI), an alfalfa seed company involved in the breeding, seed production and sales of seed of proprietary alfalfa varieties.

Our company develops, produces and sells alfalfa seed products to a wide variety of customers and market segments. We routinely test every lot of conventional (non-GE) seed produced by our seed growers for Adventitious Presence of GE traits (i.e. Roundup Ready). A significant portion of the alfalfa seed produced in the U.S. is exported out of the country. With the exception of Canada, these export countries have not deregulated Roundup Ready alfalfa. We carefully monitor for a detectable presence of GE traits in any alfalfa seed that may be destined for export and we will only export seed lots that meet a stringent non-detect standard. We are meeting the non-detect demands of the export market segment today, and are very confident of being able to do so in the long term. FGI is interested in providing seed products to organic forage producers that may demand a similar seed quality metric .

The GMO ad-hoc subcommittee is seeking response from the organic community to several questions regarding seed purity as follow:

Is there a need to establish a seed purity standard or protocol to ensure that planting seed meets the requirements of the NOP rule? *We do this today on a customer by customer basis and a unified standard would simplify the process and avoid grower confusion.*

What is currently known about the level of GMO contamination of seed used by organic farmers and any associated testing of seed on the farm or in the supply chain? Comments from farmers, seed companies, or buyers describing the following would be relevant:

- the scope of testing (e.g. frequency, methods, costs); *FGI samples/tests every lot of conventional seed, using our own lab and/or one of many third party labs conducting such tests. The associated costs are modest.*
- the threshold used for rejection; *FGI uses the 0/3,000 seed AP threshold described in your document (point #7). This is the current alfalfa industry standard used for export markets.*
- the outcome of seeds that are rejected. *Seed not meeting the non-detect standard is sold in a market where low level AP is acceptable.*

What testing methods are appropriate to use in order to determine and label for seed purity and to verify compliance to a seed purity standard? *We would support a statement on the seed tag that simply states that the seed lot has been tested and meets a specific seed quality requirement determined by NOP or some other recognized organic organization.*

How would an example, such as proposed in Discussion point #7 above, affect your farm or business? *Since this is consistent with the current industry standard for determining non-detect for export markets – it would be very easy to implement. This standard has been in place for over five years and has proven to be achievable, cost effective and has met market needs. The sampling (six samples of 500 seed, 0 detect in all samples), and testing (primarily protein-based test strips) methods are standard and can be conducted by one of several third party labs.*

What training, guidance, or resources do certifiers need to verify compliance to a seed purity standard? *We believe it should be sufficient to simply have a statement on the seed tag that certifies the seed has been tested and meets specific organic seed purity standards. Documentation on such testing should be maintained by the seed company for a standard period of time.*