



# BEYOND PESTICIDES

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March 23, 2018

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

**Re. MS: Protecting the Genetic Integrity of Seed Grown on Organic Land, Excluded Methods Terminology  
CS: Strengthening and Clarifying the Requirements for the Use of Organic Seed**

These comments to the National Organic Standards Board (NOSB) on its Spring 2018 agenda are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers, and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

The issue of protecting the genetic integrity of seed grown on organic land is related to two others that are not on the agenda –excluded methods terminology and strengthening and clarifying the requirements for the use of organic seed. **Excluded methods terminology** should be maintained on the NOSB agenda to keep up with a fast-moving biotechnology industry. **Strengthening and clarifying the requirements for the use of organic seed** should remain on the agenda to eliminate inconsistencies in the enforcement of NOP's broad exemption that allows the use of conventionally produced seed in certified organic production.

Addressing these two other issues adequately will help to ensure that the presence of plants growing from genetically engineered (GE) seeds is greatly reduced on organic farms. The issue of protecting the genetic integrity of seed grown on organic land is concerned with those instances when organic producers plant nonorganic seed, so any efforts to strengthen the requirements for organic seed would tend to eliminate the problem.

We also support efforts to quantify the extent of GE contamination and provide transparency in GE content of non-organic seeds that do not further burden organic growers.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.  
Board of Directors