

# GE Alfalfa Background

In 2006, the Center for Food Safety (CFS) sued USDA for its illegal approval of Monsanto's genetically engineered (GE) Roundup Ready alfalfa. USDA failed to conduct an environmental impact statement (EIS) before deregulating the crop, as required by law. An EIS is a rigorous analysis of the potential environmental, health, and economic impacts of a federal decision, mandated under the National Environmental Policy Act. The federal courts sided with CFS and banned GE alfalfa until the USDA fully analyzed the impacts of the GE plant in an EIS.

USDA released its draft EIS in December 2009. USDA has not taken the concerns of non-GE alfalfa farmers, dairies, exporters, retailers or consumers into consideration in its recommendation to approve the commercial sale (deregulation) of GE alfalfa. In fact, the EIS states that consumers don't care if their organic food is GE contaminated and neither do organic farmers, as long as farmers employ the organic practices required under the Organic Law (OFPA). Obviously, this is not true -- we need to push our Congressional representatives to tell USDA to deny the approval of GE alfalfa.

## Contamination is Inevitable and Impact Farmers, Consumers, and the Environment

- USDA claims that Monsanto's seed contracts require measures sufficient to prevent GE contamination. However, the Court found that GE contamination had already occurred in the fields of several Western states with these same business-as-usual practices in place!
- The EIS acknowledges that GE contamination may happen and includes studies that honey bees can cross-pollinate at distances over 6 miles, much further than any distances under Monsanto's "best practices."
- In general, where other GE crops were approved without restriction, contamination of organic and conventional seeds and crops is widespread and has been documented around the world. A recent report documented 39 cases in 2007 and more than 200 in the last decade. The 2006 Liberty Link Rice episode, where unapproved GE rice contaminated export rice stocks, alone caused over \$1 billion in damages.

## Consumers Do Care About GE Contamination of Organic Crops and Food

- Prohibition of GE is a fundamental tenet of Organic. In fact, USDA's failure to exclude GE crops from the first version of the organic rule was one of the main reasons that 275,000 people filed public comments in 1997—one of the largest outpourings of public participation in USDA history
- The Organic Standard requires that livestock feed for animals is 100 percent organic. Protecting organic alfalfa, the main source of feed for the organic dairy industry, is crucial to the health of that important sector of U.S. agriculture. More than 75% of consumers believe that they are purchasing products without GE ingredients when they buy organic.

## Consumers Will Reject GE Contaminated Alfalfa and Alfalfa-Derived Foods

➤ As the Court found to "farmers and consumers organic means not genetically engineered, even if the farmer did not intend for his crop to be so engineered." Whether or not the end product is impacted is not the issue. Farmers' fundamental right to sow the crop of their choice is eliminated when it is contaminated with transgenes, and so is the public's ability to support meaningful organic food and feed production. The public's trust in the integrity of the organic label is essential to the continued vitality of the organic foods industry.

## Harm to Small and Organic Farmers is Significant

➤ Small, family farmers are the backbone and future of American agriculture and must be protected. The continued vitality of the non-GE and organic sector is imperiled by the complete absence of protections from GE contamination and subsequent environmental, consumer, and economic losses. The from GE contamination are many and include: lost markets, lost sales, lower prices, negative publicity, withdrawal of organic certification, expensive testing and prevention measures, and product recalls.

## GE Alfalfa Would Significantly Increase Pesticide Use --Harming Human Health and the Environment

- USDA assumes that all conventional alfalfa growers regularly use large quantities of herbicides. However, the agency's own studies show that the great majority of alfalfa is currently grown without the use of any herbicides at all. This means that Roundup Ready (RR) alfalfa will increase Roundup use without significantly displacing other herbicides. USDA also admits that RR alfalfa will require more toxic herbicides like 2,4-D and dicamba for taking out old stands.
- The widespread introduction of RR crops in general has vastly increased Roundup use and fostered an epidemic of Roundup-resistant weeds. Over the past 13 years, RR crops in have significantly increased overall herbicide use on corn, soybeans and cotton - by 383 million pounds - GE alfalfa will only make matters worse.

## Economic Impacts

- Contamination will result in significant economic harm to alfalfa seed and forage export markets.
- The U.S. exported \$159 million in alfalfa forage and seed to GE-sensitive markets in Japan, Korea and Taiwan, and Saudi Arabia. It has been calculated by agricultural economists that alfalfa producers would lose \$197 million annually in alfalfa seed and forage exports as a result of RR alfalfa deregulation.
- Contamination will result in significant economic harm to the organic dairy industry. It has been calculated that milk producers would lose \$225 million annually as a result of the deregulation of RR alfalfa. George Siemens, CROPP Cooperative CEO - which processes and markets "Organic Valley" dairy and meat, says GE contamination of certified organic alfalfa stands or seed stock will devastate the organic farmers who market their milk through the CROPP Cooperative, which in 2007 alone had annual sales of \$333 million and a growth rate of 38% between 2005-2007.