



# National Organic Coalition

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## NOC MEMBERS

*Beyond Pesticides*

*Center for Food Safety*

*Equal Exchange*

*Food & Water Watch*

*Maine Organic Farmers and Gardeners Association*

*Midwest Organic and Sustainable Education Services*

*National Cooperative Grocers Association*

*Northeast Organic Dairy Producers Alliance*

*Northeast Organic Farming Association - Interstate Council*

*Organic Seed Alliance*

*Organically Grown Company*

*Rural Advancement Foundation International -USA*

*Union of Concerned Scientists*

September 28, 2011

National Organic Standards Board  
USDA National Organic Program  
1400 Independence Ave. SW  
Room 2646 – South Stop 0268  
Washington, DC 20250

Via Email: [Lorraine.Coke@ams.usda.gov](mailto:Lorraine.Coke@ams.usda.gov)  
and NOSB members

Dear Members of the National Organic Standards Board:

At the last NOSB meeting in Seattle, the Board received over ninety comments in writing and in public testimony by people expressing their concern about the potential contamination of organic by genetically engineered organisms (GE). Again, at the NOP Listening Session in Washington, DC, on September 20<sup>th</sup>, many public commenters addressed this topic as well as the need for the NOP to be more proactive in preventing contamination from GE organisms. These comments demonstrate the public's belief that the NOSB and the National Organic Program (NOP) need to do more to ensure that GE-contaminated organic ingredients do not make their way into the certified organic foods.

The National Organic Coalition (NOC) commends NOSB member, Jennifer Taylor, for taking the initiative to draft a "Sense of the Board Statement on Genetically Engineered Crops,"<sup>1</sup> as the Board's response to significant public comment on the issue. As we understand it, the purpose of a "Sense of the Board Statement" is to relay to the Secretary of Agriculture an issue(s) of overwhelming concern to the organic community that the public asked to be considered by the Board's at its bi-annual public meeting. Indeed, as a Federal Advisory Committee and statutory Board constituted under OFPA, one of the NOSB's significant and appropriate roles is to report directly to the Secretary and to give advice regarding all matters relating to organic farming and food production. As stated in the law:

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<sup>1</sup> "Sense of the Board Statement on Genetically Engineered Crops," (April 2010). National Organic Standards Board Meeting.

The Secretary shall establish a National Organic Standards Board (in accordance with the Federal Advisory Committee Act (5 U.S.C. app. 2 et seq.) (hereafter referred to in this section as the "Board") to assist in the development of standards for substances to be used in organic production and to advise the Secretary on any other aspects of the implementation of this chapter. (OFPA)

The "Sense of the Board" statement is neither a policy document nor intended to outline solutions to the problem, but it is intended to be sent to the Secretary in a timely manner.

NOC remains hopeful that the NOSB will submit a "Sense of the Board Statement on Genetically Engineered Crops," to the Secretary, prior to its next Board meeting in November. We believe that the statement presented on the last day of the meeting accurately reflects public sentiment about the need for USDA and the NOP to collaborate in the development and institution of GE contamination prevention measures. NOC further believes that it is both desirable and appropriate for the NOSB to acknowledge on behalf of the organic community that:

USDA's actions on genetically engineered crops have been insufficient to protect the organic industry. Organic agriculture continues to be at risk of contamination by genetically engineered crops... [The NOSB] "urge[s] the Secretary of Agriculture to take immediate and aggressive action to prevent GE contamination of organic."<sup>2</sup>

Although we understand this statement is a small first step to take, we believe that the adoption of a strong policy of shared responsibility between the USDA and NOP is the only way to prevent GE contamination and to preserve all agriculture markets for U.S. farmers -- organic, non-GE conventional, and GE.

Regarding the exact wording of the statement, although "zero tolerance" of GE is a goal desired by many in the organic community, the issue requires a much wider public policy debate, which extends well beyond the scope of the current "Sense of the Board Statement on Genetically Engineered Crops." Therefore, NOC supports striking the "zero tolerance" language from the last sentence of the statement and retaining the rest of the language verbatim, as written below.

In conclusion, NOC urges the NOSB to immediately adopt the "Sense of the Board Statement on Genetically Engineered Crops" and send it to Secretary Vilsack. This will go a long way in reassuring the public that the NOSB is responsive to its critical issues of concern and that the NOSB and NOP will not turn a blind eye on GE contamination of organic. We have attached our suggested amended version of the text.

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<sup>2</sup> Ibid.

Thank you for your consideration of this important issue that threatens organic integrity. We would certainly welcome further conversation on GE contamination of organic, but such a dialogue is not needed prior to sending the statement to the Secretary.

Sincerely,



Liana Hoodes  
Executive Director  
National Organic Coalition



Lisa J. Bunin, Ph.D.  
Organic Policy Coordinator  
Center for Food Safety

## National Organic Standards Board<sup>3</sup>

### Sense of the Board Statement on Genetically Engineered Crops

The significant number of unsolicited public comments at the April 2011 NOSB meeting have illustrated the extreme concern the impact that continued approvals by USDA of new genetically engineered crops has had on our community of organic farmers, consumers, and handlers.

The NOSB, speaking for the organic community, believe that the USDA's actions on genetically engineered crops have been insufficient to protect the organic industry. Organic agriculture continues to be at risk of contamination by genetically engineered crops.

This threat is a critical issue for organic agriculture producers and consumers of their products.

We urge the Secretary of Agriculture to take immediate and aggressive action to prevent GE contamination of organic: ~~We urge the Secretary of Agriculture to urge zero tolerance to GE contamination of organic agriculture.~~

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<sup>3</sup> Presented at NOSB meeting, April 29, 2011.