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

RE: DOCKET: AMS-NOP-14-0006

**COMMENTS TO THE MATERIALS SUB-COMMITTEE REGARDING
“Materials/GMO ad hoc Subcommittee Report, Seed Purity from
GMOs,” (Feb 014**

Founded in 1971, the Northeast Organic Farming Association (NOFA) is one of the oldest grassroots organic farming groups in the US. NOFA is a federation of seven independent state NOFA chapter organizations: NOFA-VT, NOFA-NH, NOFA-NY, CT-NOFA, NOFA/MASS, NOFA-RI and NOFA-NJ that meet regularly to work together on an interstate basis on regional, national and international initiatives.

NOFA also works closely with other sustainable agriculture and organic groups and coalitions – participating in policy initiatives in Washington, D.C. and in meetings around the country. NOFA is a founding member of the National Organic Coalition (NOC), the National Sustainable Agriculture Coalition (NSAC), the Domestic Fair Trade Association (DFTA) and Call to Farms. Regional partners include the Northeast Sustainable Agriculture Working Group (NESAWG) and the Maine Organic Farmers and Gardeners Association (MOFGA). Internationally, NOFA is also a member of the International Federation of Organic Agriculture

Movements (IFOAM) and its farmer network. These docket comments are prepared by the Policy Coordinator for the NOFA Interstate Council.

I. Support for National Organic Coalition (NOC) comments:

NOFA is a grassroots co-founder of NOC and works closely with coalition members to advocate for organic integrity in the USDA/NOP/NOSB process.

For the upcoming NOSB meeting in San Antonio NOFA fully supports all of the comments submitted by NOC, with a special emphasis on NOC's comments on USDA's unilateral changes to Sunset Policy.

NOFA is deeply concerned that these top-down changes from USDA serve to perpetuate materials on the National List by not subjecting them to the full, automatic review called for by the Organic Foods Production Act (OFPA) and thereby weakens organic integrity in the marketplace.

NOFA requests the NOSB to work vigorously with USDA/NOP to reinstate a bona fide sunset policy that is fully compliant with OFPA.

II. Comments on Preventing GMO Contamination of Organic

NOFA wishes to underscore the importance of the NOSB Materials sub-committee focus on the threat of GMO contamination to organic seed purity and integrity of markets.

Part of USDA's mission is to ensure fairness for all agriculture. However, NOFA is concerned with USDA's focus on a "co-existence" policy that relies on building farmer neighborliness and requiring farmers in jeopardy of tainted crops to purchase crop insurance to remedy GMO crop contamination. In reality this approach does nothing to prevent GMO contamination – which requires strict legal recourse that holds the patent holder liable for social and economic damages.

NOFA requests the NOSB, under its GMO issues purview, to actively pursue these contamination issues with the NOP and USDA and advocate for valid GMO contamination prevention measures that are necessary to ensure organic integrity and consumer choice in the marketplace.

Thank you,

Sincerely,
Steve Gilman
NOFA-IC Policy Coordinator