



National Organic Coalition

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January 7, 2011

The Honorable Tom Vilsack
Secretary, US Department of Agriculture
1400 Independence Ave. SW
Washington, DC 20585
agsec@usda.gov

Dear Secretary Vilsack:

Thank you for reaching out to the organic community during this most challenging of times. We are sincere in our commitment to “roll-up” our sleeves and seek workable solutions by strongly urging the development of a comprehensive framework for moving forward on this critical issue of GMO contamination prevention. As you know, a robust agricultural sector is one that consistently supplies more than enough food to feed a nation, can respond with nimbleness to crises, protects the environment, excites competition and the spirit of innovation and provides sustainable economic opportunities up and down the supply chain. We recommend enactment of a comprehensive plan that will provide the appropriate opportunities and protections to US agriculture to preserve its unique competitive advantage in international commerce.

NOC wants to ensure that this plan: a) meets USDA's statutory responsibility for full and adequate environmental impact review as it affects both conventional and organic growers who choose not to plant a genetically engineered crop; and, b) is not being driven by any short-term business pressures of any sectors of agriculture but is protective of the long-term rights of American agriculture and consumers. We are advocating that this complex and controversial plan protects these rights and is ultimately based on real world conditions and science.

We agree with your statement that “the rapid adoption of GE crops has clashed with the rapid demand for organic and other non-GE products.” But, sound science has not always underpinned government decisions to approve a range of GMO crops. In particular, we are extremely concerned about the absence of any longitudinal, scientifically rigorous health studies on the impacts of eating genetically altered foods by humans and animals alike. There has been recent research regarding other GMO crops which indicates the possibility of

unintended consequences. For instance: Indiana showing that Bt corn toxins remain active in aquatic ecosystems and are toxic to caddisfly larva; that non-approved varieties of GMO canola have established wild populations in North Dakota; that numerous weeds have developed herbicide resistance since the introduction of GMO crops; and that pesticide compounds from GMO crops are being found in non-GMO crops and products. Where independent research has not been done, our decisions must be towards precaution.

Because GMO foods remain unlabeled, consumers continue to eat GMO foods that have not been adequately tested for their health impacts, without their knowledge or consent. This goes against the will of the majority of the American people who, when surveyed, repeatedly express their desire to have GMO foods labeled and to be given a choice about whether to eat GMO foods.

The development of a workable and comprehensive USDA *GMO Contamination Prevention Plan* should specifically include, at least the following Seven Point Plan:

1. Establishment of a fully distinct and separate USDA public cultivar and breeds Institute to ensure that farmers have elite public cultivar and breeding choices that are not genetically modified and that germplasm collections are free of GMO contamination.
2. Creation of a *Contamination Compensation Fund* in FSA or RMA funded by GMO patent holders and based upon their strict liability. This would provide immediate assistance to all farmers and other supply chain participants contaminated by GMOs, pending further necessary remedies of law and equity. Such a Fund would establish costs associated with the prevention of GMO commingling and contamination from seed to table and would include both perpetual type costs as well as identity preserved price differential costs for organic and other non-GMO.
3. Ongoing GM crop regulation, including the complete elimination of deregulated GM crop status; including prior deregulations and on-going oversight and public evaluations of compliance and enforcement.
4. Comprehensive, independent, longitudinal studies on the health impacts of eating GMOs and on the environmental and socio-economic impacts of release prior to GM crop approvals.
5. Prohibition on the growing of GM crops that are deemed too promiscuous to prevent GMO Contamination.
6. Mitigation of food security risks associated with the concentration of any sector of our food system in the hands of a few companies or with the use of one food production technology or patented seeds or genotypes to the near exclusion of all others.
7. Institution of an immediate labeling protocol for all GM crops, products, and ingredients in close collaboration with other agencies as required.

We strongly believe the above seven-point *GMO Contamination Prevention Plan* would create very meaningful steps toward restoring a rational marketplace and meeting USDA obligations to ensure fairness and choice for all farmers. We are fully prepared to aid in this development. We ask that you exercise USDA's clear authority to protect all segments of U.S. Agriculture.

Sincerely yours,

A handwritten signature in cursive script that reads "Liana Hoodes".

Liana Hoodes,
Director

Cc: Kathleen Merrigan, Deputy Secretary