

**Formal Recommendation by the  
National Organic Standards Board (NOSB)  
to the National Organic Program (NOP)**

**Date:** May 22, 2012

**Subject:** GMO Letter to the Secretary

**Chair:** Barry Flamm

**The NOSB hereby recommends to the NOP the following:**

Rulemaking Action \_\_\_\_\_  
Guidance Statement \_\_\_\_\_  
Other  X

**Statement of the Recommendation (Including Recount of Vote):**

Send a letter to Secretary Vilsack about GMOs and Organics

**Rationale Supporting Recommendation (including consistency with OFPA and NOP):**

Advice to the Secretary as per our NOSB mandate to keep excluded methods out of organic

**Committee Vote:**

**Moved:** Colehour Bondera

**Second:** Mac Stone

**Yes:** 15

**No:** 0

**Abstain:** 0

**Absent:** 0

**Recusal:** 0

**National Organic Standards Board  
Ad hoc GMO Committee  
Proposal  
Letter to the Secretary on GMOs**

**May 22, 2012**

May 22, 2012

The Honorable Tom Vilsack  
Secretary of Agriculture  
US Department of Agriculture  
Washington, DC 20250

Dear Honorable Secretary Vilsack:

The National Organic Standards Board (NOSB) members appreciate the opportunity to carry out our authority under the Organic Foods Production Act (OFPA) to provide advice on the development of organic standards and to determine substances for the National List.

The NOSB accepts responsibility for making recommendations that pertain to "excluded methods" to ensure that GMOs (genetically modified organisms) are prohibited in organic production and handling. To do this we have established an Ad Hoc Committee on GMOs. The NOSB, speaking for the organic community, believes the USDA's actions on genetically engineered crops have been insufficient to protect the organic industry.

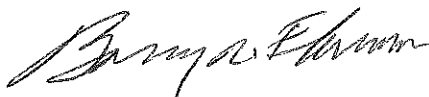
Unsolicited public comments at many NOSB meetings since the rule came out in 2002 have illustrated the extreme concern about the impact that continued deregulation of new genetically engineered crops has had on our community of organic farmers, handlers and consumers.

The NOSB ad hoc GMO committee will examine all the areas where GMO contamination poses a threat to organics and will provide leadership in clarifying what excluded methods actually are, and how compliance to the provisions of the rule can be monitored. We see the potential of contamination by genetically engineered crops as a critical issue for organic agricultural producers and the consumers of their products. There are significant costs to organic producers and handlers associated with preventing this contamination and market loss arising from it.

Organic farmers must no longer be held solely responsible to prevent contamination from practices outside their control. We feel the developers of the GMO technology should share the burden that organic farmers now assume in mitigating the gene flow between farms and should compensate organic farmers for genetic drift.

We intend to keep you informed of our recommendations on this and other GMO issues. We would like to open the door to continued dialogue with the USDA so that the responsibility to prevent GMO contamination of organics is shared by those who develop, use, and regulate this technology. USDA actions are critical to the integrity of the organic seal and consumer confidence.

Sincerely,



Barry Flamm  
Chair of the National Organic Standards Board  
c/o NOP office

Moved: Colehour Bondera	Second	Zea Sonnabend		
Yes 15	No 0	Abstain 0	Absent 0	Recuse 0