

Docket No. APHIS-2007-0044
Regulatory Analysis and Development, PPD, APHIS, Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

As an organic food producer, I am deeply troubled by the claims in USDA's Environmental Impact Statement (Docket No. APHIS-2007-0044) on genetically modified alfalfa. Specifically, USDA claims that there is no evidence that consumers care about contamination to organic alfalfa and alfalfa-derived foods from Monsanto's GMO Roundup Ready alfalfa. This strongly contradicts our experience as organic producers who are keenly aware of what our customers expect of our products.

Exclusion of genetic modification (GM) is a fundamental tenet of the Organic Standard, and polls show that more than 75% of consumers believe that they are purchasing products without GM ingredients when they buy organic. In order to meet that expectation and retain our customers' trust, we must work to keep GMOs out of our products, which carries burden and expense. As cultivation of GM corn, soy, canola, sugar beets and cotton has become increasingly widespread, we have had to adopt new quality control measures and implement testing programs to identify GM. This protection of our products, and of our brand's reputation, comes at a cost to our company. The threat of GMO contamination, and the subsequent loss of consumer trust in our brand, has become so severe that we are now enrolled in the Non-GMO Project. This program helps us mitigate contamination but is not a substitute for government regulation and protection. The deregulation of GM alfalfa, an insect pollinated perennial crop carrying high risk of seed and forage contamination, would further add to our economic and testing burden and, contamination could eventually make it impossible to produce non-GMO organic animal products..

Although the USDA claims that consumers will not reject GM contamination of organic alfalfa if the contamination is unintentional or if the transgenic material is not transmitted to the end milk or meat product, our experience, based on knowledge of our customers' expectations, contradicts this. The Organic Standard requires that livestock feed for animals used for meat, milk, eggs, and other animal products is 100 percent organic. As the Court found in the lawsuit that required this EIS, to "farmers and consumers organic means not genetically engineered, even if the farmer did not intend for his [or her] crop to be so engineered." In addition, although current technology for GM testing is limited to identification of proteins and, therefore, does not identify GM from feed in end animal products, there is no scientific proof that the contamination does not pass through. In order to protect our business, and our industry, a conservative approach is required. The USDA must not deregulate GM alfalfa.