

Docket No. APHIS-2007-0044
Regulatory Analysis and Development, PPD, APHIS, Station 3A-03.8
4700 River Road Unit 118
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As a natural 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 natural producers who are keenly aware of what our customers expect of not only organic, but also of natural products.

Our customers count on our natural products to be non-GMO. In order to meet their expectations and their 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 to mitigate GMO contamination. 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 natural, non-GMO 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. 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.