Context and Impacts

2025 General Standard Revision

First Public Comment Period

March 3, 2025 - May 1, 2025

Explore the Context and Impacts document for background on key changes, related questions, and proposals for the 2025 General Standard Revision.

For simplicity, The Non-GMO Project Standard Version 16.1 will be called "Version 16.1" or "v16.1." Similarly, Redline Draft 1 – First Public Comment – v16.1 is designated as "Redline Draft 1" and includes proposed changes to v16.1. Please note that not all proposed changes are referenced in the table below; for a complete representation of all modifications, refer to Redline Draft 1.

We encourage all commenters to review all topics and their related Redline Draft 1 references. Each proposed change helps improve the clarity, accessibility, and integrity of the Standard. The topics listed in the table may be especially relevant to certain stakeholder categories, but we know that every business and individual has unique concerns. Your feedback — whether on priority topics or across multiple areas — will help ensure the Standard remains clear, effective, and practical for everyone.

Stakeholder Category	Suggested Priority Topics
Brand Owner	Questions 1 through 9, Probiotics – Refinement of terminology and Revising compliance structure - Separating Product and Participant requirements.
Contract Processor	Questions 1 through 4 and 6 through 9, Probiotics – Refinement of terminology, Clarifying the inspection exemption for contract processors and Clarifying the inspection exemption for contract processors.
Crop or Seed Producer	Questions 1 and 5 through 9.
Distributor	Questions 1, 4 through 9, Probiotics – Refinement of terminology and Revising compliance structure - Separating Product and Participant requirements.
Livestock or Poultry Producer (meat, eggs, dairy)	Questions 1, 5 through 7 and 9.
Processor/Mill	Questions 1 through 9, Probiotics – Refinement of terminology and Revising compliance structure - Separating Product and Participant requirements.
Retailer	Questions 5 through 9 and Revising compliance structure - Separating Product and Participant requirements.
Laboratory	Clarifying the definitions of Testable and Non-Testable

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Important questions and feedback opportunities

Question 1 Reviewing typically unevaluated Inputs for prohibited substances

What challenges or opportunities might arise if Inputs that are typically not evaluated were assessed to confirm they do not contain prohibited substances?

Current state

Inputs and Ingredients used to manufacture Products are treated in three different ways:

- Prohibited – Materials that cannot be used in Verified Products at any amount.
- In scope – Inputs and Ingredients that must be evaluated to ensure they meet the Standard's requirements before use. This evaluation includes confirming they do not contain prohibited substances.
- Out of scope – Inputs and Ingredients that do not require evaluation and have no specific requirements for use in or in the manufacture of Verified Products.

Currently, out of scope materials are exempt from evaluation and may be used without confirming whether they contain prohibited substances. However, some of these materials — such as nutrients used in growing some Microorganisms, probiotics, and some Enzymes — may contribute indirectly to the production of Ingredients used in Products.

What is the potential change?

The Project is exploring whether certain out of scope materials should undergo a limited evaluation to confirm they do not contain prohibited substances. This evaluation would not classify these materials as in scope or subject them to full assessment under the Standard, but it would provide an initial screening before their use in or in the manufacture of Verified Products.

What would this change mean?

If a change were made, certain materials currently out of scope might require a limited evaluation to confirm they do not contain prohibited substances. These may include compost, Processing Aids, some nutrients fed to Microorganisms, and some Inputs to animal feed at specific amounts. This exploration does not propose a full evaluation but rather a focused assessment to ensure compliance before their use in or in the manufacture of Verified Products.

Who may be affected by this change?

The proposed language might impact stakeholder categories including: Brand Owner, Contract Processor, Crop or Seed Producer, Distributor, Livestock or Poultry Producer (meat, eggs, dairy) and Processor/Mill.

References

- v16.1 Section 2.2, Input and Ingredient Evaluation
- Redline Draft 1 Sections 2.2.1 and Further Language Not Yet Proposed

Question 2 Impact of clarifying prohibitions on biological compounds

The Project has proposed language that more clearly prohibits biological compounds naturally produced by humans but synthesized in host organisms using human genetic material. What unintended consequences, if any, could arise from this proposal? Are there other factors the Project should consider to address potential issues?

Current state

Version 16.1 already prohibits certain Inputs and Ingredients, including genetically modified animals, substances made using synthetic biology, and controlled substances. While v16.1 also prohibits substances naturally made by the human body when they are obtained instead from Genetically Modified organisms such as yeast or bacteria (a process known as "heterologous expression"), Redline Draft 1 includes proposed language intended to make this prohibition clearer.

What is the potential change?

The updated language is intended to make it explicit that all substances normally made by the human body — but produced in other organisms using human genetic material — are not allowed.

The proposed language does not change the intent of the requirement but ensures a clearer understanding and consistent application of the Standard.

What would this change mean?

Synthetic biology allows one organism to produce a substance that is normally made by another. This process is used in food, personal care and textiles. Examples include:

- Human Milk Oligosaccharides (HMOs) – HMOs are complex sugars found in human breast milk that support gut health and the immune system. They can be made in bacteria for use in infant formula and other nutrition products. Another way to describe this process is "Heterologous Expression of Human Milk Oligosaccharides in Microbial Hosts for Carbohydrate Production."

- Human-identical collagen – Collagen, a protein found in human and animal connective tissues, can be made in yeast or bacteria for skincare, cosmetics, and personal care. Another way to describe this process is "Heterologous Expression of Human Collagen in Microbial Hosts for Protein Production."

The proposed language clarifies that substances naturally made by humans, like HMOs and human-identical collagen, but produced in other organisms using human genetic material, are not allowed under the Standard.

Who may be affected?

The proposed language is intended to clarify an existing requirement and is not expected to impact any stakeholder categories. However, stakeholders are encouraged to review the proposed language to ensure they understand it. Stakeholder categories who may want to take a closer look include: Brand Owner, Contract Processor and Processor/Mill.

References

- v16.1 Section 2.2.3.e
- Redline Draft 1 Section 2.2.1.e

Question 3 Expanding clarity on prohibited biological compounds

The Project has proposed language that more clearly prohibits biological compounds naturally produced by humans but synthesized in host organisms using human genetic material. Could the proposed language, specifically application of the term "heterologous expression" which currently applies only to human biological compounds, be expanded to include other compounds, such as animal-free dairy proteins and vanillin? How practical and effective would this approach be for broader applications?

Current state

Version 16.1 already prohibits certain animal-derived compounds and microbially produced compounds created through heterologous expression — a process where genes from one species are inserted into another to produce a compound it would not naturally create. Redline Draft 1 currently includes proposed language intended to more clearly prohibit biological compounds that are naturally produced by humans but synthesized in host organisms using human genetic material. However, this restriction is embedded within the prohibition on synthetic biology.

Examples of prohibited biological compounds include animal-free dairy proteins, such as whey and casein produced in yeast or bacteria, and vanillin, a key component of vanilla flavoring that can be produced through precision fermentation. The proposed language in Redline Draft 1 aims to clarify these restrictions and demystify aspects of synthetic biology.

What is the potential change?

The Project is exploring whether the proposed language that explicitly prohibits human biological compounds produced in host organisms should be expanded to explicitly prohibit certain animal-derived and microbially produced compounds created through heterologous expression. Key considerations for this potential refinement include:

- Scope consistency – Should the Standard apply the same terminology to animal-derived and microbially produced compounds as the Project is proposing for human biological compounds?
- Practicality – How feasible is it to expand the use of the term "heterologous expression" without creating unintended consequences?

What would this change mean?

Heterologous expression is widely used in food, personal care, and textiles. Examples include:

- Animal-free dairy proteins – Whey and casein, normally derived from cows, can be produced in yeast or bacteria using precision fermentation.
- Vanillin – The primary flavor component in vanilla, which can be synthesized in microbial hosts instead of extracted from vanilla beans.
- Egg white proteins – Ovalbumin, the main protein in egg whites, can be produced using microbial fermentation instead of being sourced from eggs.
- Molecular farming for blood proteins – Hemoglobin and other blood-derived proteins can be produced in plants or microbes rather than sourced from animals.
- Animal-free gelatin – Gelatin, traditionally derived from collagen in animal tissues, can be produced through precision fermentation.
- Spider silk proteins – Used in textiles and biomaterials, these proteins can be produced in yeast or bacteria rather than harvested from spiders.

While the Standard already prohibits animal-derived and microbially produced compounds created through synthetic biology, the proposed language in Redline Draft 1 would provide clearer expectations to ensure consistent interpretation and application.

Who may be affected?

Stakeholder categories who may want to consider potential impacts include: Brand Owner, Contract Processor and Processor/Mill.

References

- v16.1 Sections 2.2.1.e, 2.2.3.e
- Redline Draft 1 Section 2.2.1.e

Question 4 Reviewing Enzymes named in text on the Principal Display Panel

How might removing the Micro Exemption for Enzymes named in text on the Principal Display Panel and simultaneously listed on the Ingredient Panel affect compliance with the Standard? What challenges or opportunities could this create for stakeholders, like manufacturers or processors?

Current state

Some Ingredients used in a very small proportion of the total Product weight, called Micro Ingredients, can be included in Products without needing proof that they are Non-GMO; this is called a Micro Exemption. Only some Micro Ingredients qualify for Micro Exemptions, and all Micro-Exempted Ingredients combined cannot exceed 0.9% of the Product's total weight. This means that even if a Product contains many Micro Ingredients that qualify for Micro Exemption, only a limited amount may be included without requiring proof that they are Non-GMO.

Under v16.1, Enzymes are eligible for Micro Exemption even if they are listed on the Ingredient Panel and named in text on the Principal Display Panel (PDP). The PDP is the part of a Product's packaging that is most visible to shoppers on a store shelf. It typically includes the Product name, branding, and key claims, such as "gluten-free" or "contains probiotics."

What is the potential change?

The Project is considering a change to one Micro Exemption allowance for Enzymes, making them ineligible if they are named on both the PDP and Ingredient Panel of a Product.

What would this change mean?

If this change is made, Non-GMO Enzymes will be required when listed on both the PDP and Ingredient Panel. This better aligns the evaluation of Enzymes with other Micro Ingredients, clarifies labeling requirements, and may require compliance adjustments and additional documentation. Since most Ingredients advertised on the PDP and listed on the Ingredient Panel already require Non-GMO sourcing, this change ensures consistency in verification.

Who may be affected?

This proposed language might impact stakeholder categories including: Brand Owner, Contract Processor, Processor/Mill and Distributor.

References

- v16.1 Sections 3.1.3, 10.2.4, 10.2.5
- Redline Draft 1 Sections 3.1.3, 10.2.3, 10.2.4

Question 5 Strengthening access to Certificates of Verification

Which potential changes would be most effective in improving access to Certificates of Verification (COV) for businesses and stakeholders? Please rank all three options in order of importance, with 1 being the most important and 3 being the least important. If "I choose not to answer" is ranked as 1, the question will remain unanswered.

- I choose not to answer.
- Automated digital access to COVs
- Extending the validity of a COV beyond the 30-day grace period
- Empowering Participants to request copies of COVs directly from the Project

Current state

As the scheme owner, the Project owns and operates the Product Verification Program (PVP), while Technical Administrators (TAs) evaluate Products for compliance with the Standard. When a Product meets all PVP requirements, a TA may issue a Certificate of Verification (COV).

The COV supports brands that display the Non-GMO Project Verification Mark on packaging, helping strengthen consumer trust and marketability. It also serves as proof of compliance for retailers and distributors that require third-party verification while supporting supply chain transparency and marketing efforts.

What is the potential change?

The Project is asking stakeholders to rank the following three options for improving access to COVs:

- Automated digital access to COVs
- Extending the validity of a COV beyond the 30-day grace period
- Empowering Participants to request copies of COVs directly from the Project

What would this change mean?

On average, the Project receives 20 COV requests per month through the TA confirmation process. The intent of each of these options is to make it easier for Participants to access COVs thereby increasing transparency and efficiency, and to streamline a process that can be challenging for Participants.

Who may be affected?

Stakeholder categories that might be affected include: Brand Owners, Manufacturers, Distributors, Crop or Seed Producers, Livestock or Poultry Producers, Processors/Mills, Contractors, Copackers and Retailers.

Question 6 Assessing value, access, and use of Verified Ingredients

What specific changes to the Standard could help overcome existing challenges while improving the value, usability, or accessibility of Verified Ingredients for businesses and other stakeholders?

Current state

In the supply chain, a Verified Product — such as Non-GMO Project Verified cornstarch — becomes a Verified Ingredient when purchased by another business and incorporated into a different Product's recipe.

What is the potential change?

Currently, there is no proposed change in Redline Draft 1 to language that directly impacts the accessibility to Verified Ingredients. A proposed change discussed under Question 7 may be interpreted by some stakeholders as impactful to value and use.

The Project is seeking comment on Verified Ingredients to better understand stakeholder perspectives. Feedback is welcome on any aspects of v16.1 that may impact their value, usability, or accessibility, including potential improvements to verification processes, market accessibility, or supply chain transparency.

What would this change mean?

There is no change proposed currently.

Feedback from stakeholders can help determine if any updates to Verified Ingredients or their role in supply chains should be considered in the future.

Who may be affected?

Changes to Standard language if proposed in future Redline Drafts might impact stakeholder categories including: Brand Owners, Contract Processors, Crop or Seed Producers, Distributors, Livestock or Poultry Producers (meat, eggs, dairy), Processors/Mills or Retailers.

References

- Redline Draft 1 Table 3-2
- Redline Draft 1 Sections 4.1, 5.1, 10.1.2

Question 7 Assessing inspection requirements for Verified Ingredients

How should the Standard address inspection requirements and compliance criteria to ensure they are both meaningful and achievable for businesses sourcing Verified Ingredients for their Products seeking Non-GMO Project Verification?

Current state

Under v16.1, facilities engaged in Parallel Processing of both Verified and un-Verified single-Ingredient materials are not explicitly required to undergo onsite inspections. For example, a facility processing both Verified and conventional single-Ingredient cornstarch

may not need an inspection if the Verified cornstarch is sourced as a Verified Ingredient from a supplier.

What is the potential change?

The Project is considering reclassifying "Verified-Status" from a Risk Status to a compliance pathway. If implemented, this change may require onsite inspections for facilities processing both Verified and conventional Ingredients to help ensure verification integrity across the supply chain.

What would this change mean?

Adding annual inspection requirements for Verified Ingredients comprising a single Ingredient derived from a High-Risk crop would standardize inspection protocols for facilities handling both Verified and conventional Ingredients. This change could help ensure that compliance criteria are both meaningful and achievable by:

- Increasing the rigor of compliance requirements for operations conducting Parallel Processing.
- Reducing the risk of cross-contamination between Verified and conventional Ingredients.

Who may be affected?

The proposed language might impact stakeholder categories including: Brand Owner, Contract Processor, Processor/Mill, Distributor, Retailer, Crop or Seed Producer and Livestock or Poultry Producer (meat, eggs, dairy).

References

- v16.1 Section 5.1
- Redline Draft 1 Section 5.1

Question 8 Assessing the risk of GM cane sugar in the Non-GMO supply chain

What additional data, evidence, or supply chain practices should the Project consider regarding the risk of GM cane sugar entering the Non-GMO supply chain? How does this information support or oppose adding sugarcane to the High-Risk List and requiring an Affidavit to confirm Non-GMO sourcing?

Current state

Sugarcane is not classified as a High-Risk crop for GMO contamination under v16.1. However, publicly available data from the 2023/2024 planting season in Brazil indicates that GM sugarcane cultivation — while still low — has increased. According to USDA GAIN Reports, GM sugarcane accounted for 0.45% of the 9.5 million hectares (approximately 23.5

million acres) planted in Brazil, totaling approximately 42,750 hectares (about 105,600 acres).

What is the potential change?

The Project is evaluating whether sugarcane should be classified as a High-Risk crop. Stakeholders are invited to provide input on:

- The need for High-Risk classification and its impact on verification.
- The role of Affidavits in ensuring Non-GMO sourcing.

What would this change mean?

If sugarcane were classified as a High-Risk crop, additional compliance measures would be required to verify Non-GMO sourcing when cane sugar is used as an Ingredient in Products.

Who may be affected?

The proposed language might impact stakeholder categories including: Brand Owner, Contract Processor, Processor/Mill, Distributor, Retailer and Crop or Seed Producer.

References

- Redline Draft 1 Appendix B.1.1

Question 9 Assessing chain of custody requirements

What changes to the Standard could enhance, refine, or streamline the current Chain of Custody requirements?

Current State

Version 16.1 includes Chain of Custody (CoC) requirements to ensure Non-GMO materials stay separate, traceable and documented throughout the supply chain. A Product's evaluation is based on its Ingredients and Inputs, which are classified by Weight Percentage, Risk Status and Testability—showing how much they contribute to the Product, whether they may come from GMOs and if they can be tested.

These requirements apply to both supply chain roles and Ingredient attributes to ensure compliance through segregation, cleaning, traceability and quality assurance.

What is the potential change?

Currently, there is no proposed change in Redline Draft 1 to language impacting CoC requirements.

The Project is seeking feedback on ways to refine CoC requirements. Public comments are welcome on documentation, segregation, traceability and compliance. Stakeholder input

can help identify updates that better fit supply chain practices and Ingredient attributes (Weight Percentage, Risk Status and Testability).

What would this change mean?

Currently, there is no proposed change in Redline Draft 1 to language impacting CoC requirements.

Stakeholder feedback can help inform/determine if updates could improve clarity, consistency or usability of CoC. Key considerations include how Ingredient attributes affect compliance and whether updates support implementation across supply chains.

Who may be affected?

A change to CoC requirements might impact stakeholder categories including: Brand Owner, Contract Processor, Processor/Mill, Distributor, Retailer, Crop or Seed Producer and Livestock or Poultry Producer (meat, eggs, dairy).

References

- v16.1 Section 4, Chain of Custody

Other proposed changes

Clarifying the use of "shall" instead of "must" in the Standard

Current state

Version 16.1 uses "must" to indicate requirements that Participants are required to follow. For example: "The Ingredient must be accompanied by documentation showing compliance." In this context, "must" confirms that documentation is mandatory.

Clarification of proposed language

The Project is proposing to replace 'must' with 'shall' throughout Redline Draft 1 to improve clarity and align with industry standards. This change is not intended to alter any requirements but aims to:

- Match other standards – Many certification programs and guidelines use "shall" for required actions.
- Clarify compliance requirements – "Shall" clearly indicates that something is mandatory, not just a suggestion.
- Avoid confusion – Some standards distinguish between "shall" for requirements, "should" for recommendations, and "may" for optional steps. This update ensures consistency.

If adopted, replacing "must" with "shall" would not change any requirements—it would simply make them clearer. For example:

- Current: "The Ingredient must be accompanied by documentation showing compliance."
- Updated: "The Ingredient shall be accompanied by documentation showing compliance."

The requirement remains the same, but "shall" replaces “must.”

Who may be affected?

The proposed language does not introduce new compliance requirements and is not expected to impact any stakeholder categories.

References

- Redline Draft 1 reflecting updates throughout to replace “must” with “shall.”

Probiotics – Refinement of terminology

Current state

Version 16.1 states that probiotic Microorganisms and Ingredients made from them must be evaluated and meet compliance requirements, no matter how much is used in a Product. Whether they make up a large part of the Product or are included in small amounts, probiotics remain within the scope of evaluation. Additionally, the Growth Media fed to these probiotic Microorganisms remains temporarily outside the scope of evaluation. This section notes that the exemption is subject to reconsideration in a future Standard revision.

Clarification of proposed language

The Project is proposing updates in Redline Draft 1 that introduce three key changes:

- Definition of probiotics – "Probiotics" is now formally defined in Appendix A as: “Live Microorganisms that, when administered in adequate amounts, confer a health benefit on the host.” As a result, Probiotics is now a capitalized and a defined term within this section.
- Removal of the exemption review statement – The reference to revisiting the availability of the Growth Media exemption in a future Standard revision has been removed for consistency; all Standard sections are subject to review during Standard revisions.
- Clarification of "Product" in relation to Ingredients and Inputs – The proposed language removes "Product" in some places and keeps only "Ingredient" and "Input" for clarity. Since a Product consists of Ingredients, listing "Product" separately was unnecessary. For more details, see "Clarifying the Use of 'Product' in Relation to Ingredients and Inputs."

These updates are intended to improve clarity, consistency and accuracy in how the Standard describes Probiotics, Growth Media exemptions, and the use of "Product" in relation to Ingredients and Inputs.

Who may be affected?

The proposed language is not expected to impact any stakeholder categories. However, the following stakeholder categories may find the proposed language relevant: Brand Owner, Contract Processor, Processor/Mill and Distributor.

References

- v16.1 Section 9.4, Probiotics
- Redline Draft 1 Section 9.4 Probiotics, Appendix A - Terms and Definitions: Probiotics

Vitamins and supplements – Removal of language on future exemption review

Current state

Some proteins that help speed up chemical reactions, called Enzymes, are made by feeding nutrients to Microorganisms. These Enzymes can be used as Ingredients in Products. Under v16.1, when Enzymes produced this way are included as Ingredients in vitamin and supplement Products in significant amounts, the Growth Media they are fed remains temporarily outside the scope of evaluation. This section notes that the exemption is subject to reconsideration in a future Standard revision.

Clarification of proposed language

The Project is proposing to remove the reference to revisiting the exemption in a future Standard revision. This does not change the requirements in the section but is intended to ensure consistency in how future Standard revisions are referenced. If adopted, the update would acknowledge that all sections of the Standard are subject to review and possible revision through the General Standard Revision process.

Who may be affected?

The proposed language does not introduce new compliance requirements and is not expected to impact any stakeholder categories.

References

- v16.1 Section 9.6, Vitamins and Supplements
- Redline Draft 1 Section 9.6, Vitamins and Supplements

Clarifying the definitions of Testable and Non-Testable

Current state

DNA is the instruction manual inside living things that tells cells how to grow and function. Genetic Modification changes DNA by adding, removing or altering instructions to change traits, and each change is called an event. Depending on how an organism is Genetically Modified, the event may be found in its DNA or there may be evidence of the event as proteins within the organism. Some tests are able to detect events by checking DNA (molecular tests) or the evidence of events by looking for specific proteins (immunological tests).

Version 16.1 labels Inputs and Ingredients as Testable or Non-Testable based on whether they contain enough intact DNA or protein for reliable molecular or immunological test results.

Testable and Non-Testable Inputs and Ingredients

- Testable – Inputs and Ingredients that have enough DNA or protein at some stage in the supply chain for valid molecular or immunological test results. There must also be commercially available tests for all Genetically Modified (GM) events required by the Project.
- Non-Testable – Inputs and Ingredients that either lack enough intact DNA or protein at any point in the supply chain for reliable testing or do not have a commercially available test for required GM events.

Some organisms and their derivatives may be classified as both Testable and Non-Testable, depending on the kinds of Genetic Modifications made.

How do these tests work?

DNA and GMOs – DNA is the genetic code that makes up all living things, including plants and animals. Genetically modified (GM) crops have changes made to their DNA to give them specific traits, such as resistance to pests or herbicides.

PCR testing – PCR (polymerase chain reaction) is a laboratory method that detects and measures specific DNA sequences from GM crops. It can find even tiny amounts of GM DNA in a sample, making it a highly accurate test.

Immunoassay testing – Instead of looking at DNA, immunological methods (such as immunoassay tests) check for proteins produced by GM crops. This method is useful when the DNA has been broken down (such as in processed foods), but it may not work for all GM crops.

Clarification of proposed language

The Project is proposing to update the definitions of Testable and Non-Testable in Redline Draft 1 to improve clarity, consistency and alignment with real-world testing practices:

- Testable – Inputs with precursors in the supply chain linked to GM events, where at least one molecular testing method can quantify GM contamination and the Project requires testing.
- Non-Testable – Inputs with precursors in the supply chain linked to GM events, where no quantifiable molecular testing method exists to distinguish between Non-GM and GM counterparts, or where the Project does not require testing.

This refined language more clearly links GM events to testability, ensuring that Testable Inputs must have both a testing method and a testing requirement under the Standard.

The proposed language is not intended to change testing requirements but to clarify when and why certain crops, Ingredients and Inputs require testing under the Standard and when they do not.

Who may be affected?

The proposed language does not introduce new compliance requirements and is not expected to impact any stakeholder categories. However, the following stakeholder categories may find the proposed language relevant: Laboratory.

References

- v16.1 Section 3.3, Testability
- v16.1 Appendix A - Terms and Definitions: Non-Testable, Testable
- Redline Draft 1 Section 3.3, Testability
- Redline Draft 1 Appendix A - Terms and Definitions: Non-Testable, Testable

Clarifying the inspection exemption for contract processors

Current state

Version 16.1 exempts contract processors, businesses that manufacture or handle products on behalf of another company, from onsite inspection as long as what they are manufacturing happens under a system designed to avoid GMOs. This section notes that the exemption is subject to reconsideration in a future Standard revision.

Clarification of proposed language

The Project is proposing to remove the reference to revisiting this exemption in future revisions. This would not change the exemption itself but is intended to ensure consistency across the Standard by aligning with the principle that all sections of the Standard are subject to review and possible revision during the General Standard Revision process. Under this proposal, contract processors that are not Participants would remain exempt from onsite inspection as long as what they manufacture happens under a system designed to avoid GMOs. This update would not change how contract processors are evaluated but is intended to clarify that the exemption remains in place without being singled out for future reconsideration.

Who may be affected?

The proposed language does not introduce new compliance requirements and is not expected to impact any stakeholder categories. However, the following stakeholder categories may find the proposed language relevant: Contract Processors.

References

- v16.1 Section 5.2
- Redline Draft 1 Section 5.2

Clarifying the use of "Product" in relation to Ingredients and Inputs

Current state

A Product is the final item that a company makes and sells. It has a specific formula and process and is part of the Product Verification Program.

An Ingredient is any material that becomes part of the Product. It can stay the same or change during production, but it remains in the final Product.

An Input is something used to make a Product, but it may not always be in the final Product. For example, animal feed is an Input because it helps produce milk, but the feed itself is not in the milk.

Version 16.1 sometimes refers to all three, Product, Ingredient, and Input, when discussing materials that must meet compliance requirements, including those that come from livestock or poultry.

Clarification of proposed language

The Project is proposing to remove 'Product' in some places and retain only 'Ingredient' and 'Input' to improve clarity. These proposed changes are intended to:

- Eliminate redundancy – Since a Product is made of one or more Ingredients, listing "Product" separately is unnecessary.
- Clarify compliance requirements – Ingredients and Inputs are the relevant terms when evaluating compliance with the Standard.

For example, a chicken breast sold as a packaged food is both a Product and an Ingredient. When listing requirements for the chicken breast, the Standard already accounts for Ingredients and Inputs, so including "Product" separately is not needed.

If adopted, this update would refine how Product, Ingredient, and Input are used in the Standard by:

- Improving clarity by removing extra terms that are not needed.
- Maintaining focus on Ingredients and Inputs, which are the key components for compliance.
- Clarifying compliance requirements without changing them.

This means that livestock- and poultry-derived substances, along with other Inputs and Ingredients, would remain covered—just with clearer wording.

Who may be affected?

The proposed language does not introduce new compliance requirements and is not expected to impact any stakeholder categories.

References

- v16.1 Section 8, Livestock and Poultry, and various sections throughout
- Redline Draft 1 Section 8, Livestock and Poultry, and various sections throughout

Revising compliance structure - Separating Product and Participant requirements

Current state

The Standard is one of four documents that govern the Product Verification Program (PVP). The other Program Documents are The Non-GMO Project Program Rules and Procedures (Program Rules and Procedures), The Non-GMO Project Trademark Use Guide (TMUG) and The Non-GMO Project Trademark License and Program Participation Agreement (LA). The Standard, Program Rules and Procedures and TMUG are publicly available, while the LA is a private agreement between each Participant and the Project.
Version 16.1 outlines requirements for Product specifications, labeling and quality assurance to ensure that Inputs, Ingredients and Products meet Non-GMO compliance expectations. These sections establish:

- Requirements for sourcing Inputs and Ingredients at different amounts in Product manufacturing.
- Labeling guidelines to prevent misleading claims about GMO content.
- Quality assurance steps to ensure compliance, traceability and integrity.

Clarification of proposed language

The Project is proposing updates to how Product compliance and Participant compliance are managed in the PVP. Under this proposed language:

- Product compliance would stay in the Standard, defining verification requirements for Products, Ingredients and Inputs.
- Participant compliance (e.g., documentation, audits, corrective actions) would move to the Program Rules and Procedures, where business compliance processes would be outlined.

Updates to product specifications, labeling and quality assurance would:

- Move participant compliance requirements (e.g., reporting, recordkeeping, corrective actions) to the Program Rules and Procedures, allowing the Standard to focus on Product compliance.
- Update labeling requirements to reference the Program Rules and Procedures and TMUG instead of listing all detailed claims requirements in the Standard.

These changes are not intended to alter existing compliance requirements but aim to improve clarity, consistency and usability by placing requirements in the appropriate Program Documents.

Who may be affected?

The proposed language does not introduce new compliance requirements at this time and is not expected to impact any stakeholder categories. However, the following stakeholder categories may find the proposed language relevant: Brand Owners, Contract Processors, Processors/Mills, Distributors and Retailers.

References

- v16.1 Section 10, Product Specifications and Labeling
- v16.1 Section 11, Quality Assurance
- Redline Draft 1 Section 10, Product Specifications and Labeling
- Redline Draft 1 Section 11, Quality Assurance

Guide to writing comments

Clear and constructive feedback helps improve the Standard. To ensure comments are useful and impactful, consider following this structure:

Select and describe the observation or suggestion
Select the purpose, type of edit, and importance of the comment by choosing the options that best categorize the feedback and following the corresponding prompts to tailor the comment:

What is the purpose of the comment?

- Suggestion for Improvement – Recommend changes to enhance clarity, accuracy, or usability. Specify the section, explain the issue, and propose concrete improvements.
- Proposal for New Content – Suggest adding new material or topics not currently covered. Clearly state what's missing, why it's important, and how it improves the Standard.
- Identification of Errors – Report mistakes, inconsistencies, or inaccuracies. Specify the issue, provide reasoning or evidence, and suggest corrections if possible.
- Request for Clarification – Ask for further details to better understand the content. Identify what's unclear, explain the confusion, and suggest how clarity can be improved.
- General Dissatisfaction – Express concerns about the content. Clearly describe the issue and its impact, and, if possible, suggest ways to address it.
- Praise – Highlight aspects of the content that work well. Explain why they are effective and how they contribute to the Standard's clarity or usability.
- Regulatory/Legal Compliance Concern – Identify potential conflicts with external regulations or policies. Reference specific laws or guidelines, provide context, and explain the compliance risk.
- Request for Exception/Exemption – Seek an exception to a specific requirement. Explain why the exception is needed, how it aligns with the Standard's intent, and any mitigating factors.
- Neutral Observation – Share relevant observations without suggesting changes, criticism, or praise. Provide context on why the observation is important.

What type of edit is being proposed?

- Technical Accuracy – Propose corrections to factual errors, technical inaccuracies, or incorrect details. Clearly identify the issue and suggest accurate revisions based on evidence or expertise.
- Grammar/Formatting – Point out grammatical, punctuation, or formatting issues and recommend improvements to enhance readability and consistency.

- Conceptual Clarity – Suggest edits to improve the presentation of ideas or concepts, making them easier to understand. Identify areas of confusion and propose clearer wording or structure.
- Scope or Applicability – Recommend changes to adjust the content's relevance to its intended audience or context. Explain how to refine the focus or broaden applicability as needed.
- Tone or Language Use – Recommend changes to improve professionalism, consistency, or inclusivity in language. Identify areas where wording may be biased, unclear, or inconsistent with the Standard's tone.
- Reject the Proposed Change – Explain why the proposed change should not be implemented. Provide reasoning to support the position and suggest alternatives if applicable.
- No Edit Proposed – Indicate that the comment does not suggest a specific text change, such as praise, observations, or general feedback. Use this when offering feedback without recommending edits.

How important is this comment?

- Critical, High, Medium or Low?

Specify the concept or section
Specify the concept the comment relates to. Some concepts are best illustrated by one or more parts of the Standard, so if applicable, mention the relevant sections or specific sentences. Identifying all relevant areas helps provide full context.

Explain the importance
Provide a brief explanation of why the comment matters. Will it improve clarity, accuracy, or usability? A short explanation strengthens the impact of the feedback.

Propose a solution (highly encouraged)
If possible, include a suggestion for improvement. While not required, offering a proposed revision can be especially helpful.