



verification@nongmoproject.org
www.nongmoproject.org

GMO Potato Classified as High-Risk | Frequently Asked Questions

GENERAL INFORMATION

Why has the potato been added to the High-Risk list?

The potato has been added to the High-Risk list of the Non-GMO Project Standard because a GMO potato variety is now “widely commercially available” in the United States. The Non-GMO Project considers crops and inputs to be “High-Risk” when there is a high likelihood of GMO contamination in the conventional and non-GMO supply chain.

How does the Non-GMO Project determine that a crop/input is “widely commercially available”?

The Non-GMO Project uses a risk matrix to determine when a crop/input becomes “widely commercially available,” and should, therefore, be on the Standard’s High-Risk list. The risk matrix focuses on key criteria, including the number of acres planted, the presence in the supply chain, and its potential use in human food and/or as animal feed. These and other criteria each have an identified risk value within the matrix. As Monitored GMO crops/inputs become more available, they are entered into the matrix; when their total risk score reaches a predetermined threshold, they are recommended for addition to the High-Risk list. The GMO potato has now met this threshold.

What varieties of GMO potato are known to be in the U.S. marketplace?

On the market since 2015, the GMO potato was developed by J.R. Simplot. Currently, GMO potatoes are being marketed under the Simplot Innate brand, found under the trademark White Russet. This variety features multiple traits, including non-browning and the production of lower levels of acrylamide.

In addition to fresh, whole potatoes, what types of products could be affected?

Frozen potato products (e.g., frozen french fries), prepared food that includes potato as an ingredient (e.g., pot pies), foods that contain potato starch as a thickening agent (e.g., sauces, puddings), and certain gluten-free foods that use potato flour in their formulation may all be affected by the move of the potato to the High-Risk list.

How often do new crops/inputs get added to the Non-GMO Project’s High-Risk list?

To date, changes to the High-Risk list have been rare. Alfalfa was moved to the High-Risk list in 2011 and that is the only time since the first version of the Non-GMO Project Standard was published in 2007 that a new crop has been added to the High-Risk list. That said, new product development in the biotechnology industry is accelerating. At the same time that potato is being moved to the High-Risk list, a new variety of untestable RNAi soy is also being added.

COMPLIANCE REQUIREMENTS

What is the significance of the potato being moved from the Monitored-Risk to the High-Risk list? How does the High-Risk compliance pathway differ?

Inputs on the Monitored-Risk list are those for which GMO versions are in the research and development stage, for which GMO versions have been developed but are not widely commercially available, or for which known genetically modified organism contamination has occurred. Crops on the Monitored-Risk list are evaluated as other Low-Risk inputs and do not require testing. Once a crop has been moved to the High-Risk list, it is subject to testing requirements, or confirmation of compliance by affidavit if the crop is currently not yet testable.

What does the compliance pathway look like for the potato on the High-Risk list?

The GMO potato available in the U.S. today is currently not testable, meaning that no point in the production chain exists at which one can distinguish between a non-GMO potato and a GMO potato using publicly commercially available tests according to the requirements laid out in Section V.B. and Section V.C. of the Non-GMO Project Standard. An affidavit stating that any such non-testable High-Risk input is not the product of genetic modification is required to establish compliance with the Standard. However, the industry is rapidly developing new testing methodologies, and thus compliance pathways for these not-yet-testable crops may change.

What are the affidavit requirements?

Participants will need to provide affidavits confirming the non-GMO status of all potatoes and/or potato derivatives used in Verified Products prior to initial Verification and at each annual renewal thereafter. The affidavit is a standard document created by the Non-GMO Project (available from the Project's Technical Administrators) that will need to be signed at a critical control point(s) by an individual who has sufficient knowledge of the Participant's supply chain and understands the Project's definitions of Biotechnology and Non-GMO. There may be more than one critical control point or individual within a supply chain who will meet these requirements, and the Project's Technical Administrator will evaluate the appropriateness of the signatory selected.

My products are already Verified. How long do I have to come into compliance?

Adding crops to the High-Risk list is considered a Special Revision to the Standard, provisions for which are covered in the Terms of Reference. Verified participants will have six months or until their next product renewal to come into compliance, whichever is longer. For products that are not yet verified, the new requirements are immediate.

How does this impact the status of backstock and product Verified prior to the move of the potato to the High-Risk list?

Finished, Verified products that contain potatoes and/or potato derivatives will remain Verified. Participants may use existing inventory of potatoes and/or potato derivatives for six months, or until their next product renewal, whichever is longer, without providing affidavits. Any inventory of potatoes and/or potato derivatives that have not been used within this transition period, and any potatoes and/or potato derivatives purchased thereafter for use in Verified products, must be proven compliant via affidavit in order to continue to be used in Verified Products.

Will potatoes be eligible for a Country-of-Origin (COO) Downgrade?

Yes. Similar to all other crops on the High-Risk list, the potato will be eligible for COO downgrades dependent on the GMO regulatory framework and cultivation and import practices of each individual country. This compliance pathway is available for high-risk crops that are sourced from countries where genetically engineered versions of that crop are not grown. For more information on applying for a COO downgrade process, please see [this FAQ](#).

INFORMATION FOR RETAILERS**We have a product policy requiring products with GMO risk ingredients to either be Non-GMO Project Verified or certified organic. Do we now need to start screening for all potato products as having GMO Risk?**

Yes, given the current pace of commercialization of the Simplot Innate White Russet, potato inputs should now be treated as high-risk for GMO contamination. Retailers with additional questions about how to apply this in practice may contact our [Verification team](#).

How can I help get the word out so that brands have the information they need to protect against this risk?

The Non-GMO Project is applying a comprehensive communications strategy to alert the industry about this news, including targeted emails, personal follow up communications to leading brands, and engagement with distributors and trade media. Retailers can help by sharing our press release with their vendor lists. Any questions from vendors may be referred to our [Verification team](#); press inquiries may be sent to our [Communications team](#).