

Note: Committee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)  
GMO ad-hoc Committee  
Wednesday, February 29, 2012, 3 pm ET**

**Attending:** Zea Sonnabend (Chairperson), Jay Feldman, Jennifer Taylor, Colehour Bondera and Joe Dickson

**Absent:** Mac Stone and Calvin Walker

**NOP Staff:** Lorraine Coke and Miles McEvoy

Project	Point Person	Status	Target Meeting
Letter for other FACA boards	Zea	Discussion document?	spring 2012
Get feedback from other committees on framework document topics	All committee members	In progress	Spring 2012?

**Agenda:**

- get organized – determine call schedule, select vice chair (?), previous/outstanding issues, etc.
- review/discuss documents
- create timeline and work plan
- assign tasks to committee members

**Discussion:**

Possible work plan for May meeting

- give a short presentation at the spring 2012 meeting to explain to public that they are meeting on it
- write letters to other FACA committees relating to this (AC21 Committee and Genetic Resources Advisory Committee)

Have committee members (representing other committees) take information on framework back to their individual

Suggestion to create charter or mission statement for group to help guide/focus

- important to understand perspective and why Board is spending time on this
- agreement on focus/mission among committee members

Is there resistance on this among the committee/Board?

- a more comprehensive and strategic approach may help this process

Any additions to the framework?

- under CACC, how GMO testing fits into the residue testing protocol, follow-up action, “tolerance levels” or the meaning of the results (i.e. how certifiers utilize GMO testing to verify compliance with the NOP regulations)
- Board proposal about communicating directly with Secretary of Agriculture (maybe under section regarding letters to other FACA Boards and the public) – was not put on here before because it didn’t go anywhere, the Secretary is aware of the NOP/NOSB work → have to think

about what the best avenue is to get the message heard

-recent news about APHIS trying to approve GMO varieties in a more expedient manner (could be another topic for a letter)

-both sides must be able to articulate their views and present them in a way that is constructive

Process question:

-how to draft a letter and receive public comment – list on agenda, develop proposal, open for public comments, vote (just like the process for any other proposal)

-difference between “sense of the Board” and letter asking for policy change?

Ask for time slot on EC call to get agenda spot and present proposal(s) during spring 2012 meeting

Meeting schedule:

Wednesday – 1pm EST (March 7)

Wednesday – 3pm EST (March 21)

**Next Calls:**

March 7, 2012 – present draft of mission statement for committee

March 21, 2012 –

<b>Milestone</b>	<b>Deadline</b>
Spring 2012 Agenda Finalized	Friday, March 23, 2012
Committee Proposals Due	Monday, April 2, 2012
Spring 2012 NOSB Meeting	May 21 – 24, 2012

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**National Organic Standards Board (NOSB)  
GMO ad-hoc Committee  
Wednesday, March 7, 2012, 1 pm ET**

**Attending:** Zea Sonnabend (Chairperson), Jay Feldman, and Colehour Bondera

**Absent:** Mac Stone, Joe Dickson, Jennifer Taylor and Calvin Walker

**NOP Staff:** Lorraine Coke and Miles McEvoy

Project	Point Person	Status	Target Meeting
Letter; to other FACA boards, AC21, or Secretary Vilsack	Zea	Discussion document?	spring 2012
Get feedback from other committees on framework document topics	All committee members	In progress	Spring 2012?

**Agenda:**

- Approve minutes from last call
- Mission Statement: since we agreed to discuss this I am proposing the following paragraph for consideration:  
 "The National Organic Standards Board believes that genetically modified organisms (GMOs) must be kept out of organic food and accepts responsibility for making recommendations on policies that can strengthen the rule's approach to "excluded methods". The NOSB ad hoc GMO committee will undertake examination of all the areas where GMO contamination poses a threat to organics and will attempt to provide leadership in clarifying what excluded methods actually are, and how compliance to the provisions of the rule can be monitored".
- "Sense of the Board" letter - Colehour (already circulated)
- AC 21 letter/proposal - Zea (I have been communicating with several organic reps to this board and they will send me some language tonight that I will try to circulate as soon as I can)
- Planning for presentation at next meeting and longer-term work.

**Discussion:**

- Review of draft mission statement
  - use of the word "strengthen" could be edited, maybe to a more neutral word
  - use of "strengthen" gives the assumption that you are starting from a position that it needs to be strengthened. This word could be replaced with "pertains"
  - question about what "GMO contamination" means and how it is measured/defined
  - a little long for a purpose/mission statement, but it is very inclusive
  - could stop after "excluded methods" in the 2<sup>nd</sup> sentence, but some committee members like the 2<sup>nd</sup> sentence
  - maybe some outside factors, which are outside a producers' control,
  - belief that 1<sup>st</sup> statement/sentence is important too

→new draft as discussed:

The National Organic Standards Board believes that genetically modified organisms (GMOs) must be kept out of organic food. We accept responsibility for making recommendations on policies that pertain to the rule's approach to "excluded methods". The NOSB ad hoc GMO committee will undertake examination of all the areas where GMO contamination poses a threat to organics and will attempt to provide leadership in clarifying excluded methods, with a focus on implementation.

-some reservations on the use of the word "contamination" – how does this include the "use" of GMO products/methods? How do you keep GMOs out of organic production?

-some may argue that "Contamination" has an acceptable level

-original mission statement tried to include "contamination" and "leadership" to try to address these concerns from the public

→another possible draft:

The National Organic Standards Board believes that genetically modified organisms (GMOs) must be kept out of organic food. We accept responsibility for making recommendations that pertain to "excluded methods" to ensure that GMOs are prohibited in organic production and handling and don't contaminate organic agricultural products. 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.

- "Sense of the Board" letter:

- this committee should be communicating/advising the secretary of agriculture on these issues – one committee member expressed that this is important and could be done fairly easily

- the longer letter, which was sent by email, is similar to shorter letter(?) – either one could be used, depending on what the committee decides

- if committee were to decide that one is preferable to the other, then could go with revising/editing only that draft

- first issue, should we have a letter (if yes, who should it go to?)? second issue - what should it say?

- the first letter seemed to have come out as a "reaction" to the deregulation of sugar beets, interest in broadening the letter

- sending this letter to AC21 may be the best approach because they are dealing with some of these issues

- feeling from several committee members that a letter is the most feasible product to present at the spring meeting, some members also suggested a discussion document

- suggestion to create a separate letter to the secretary – this may be best to propose to the group

- consider the fact that the letter will be published on the NOP website

- moving forward – starting with a short letter (to the secretary?), including mission statement, rewording to make the letter more focused, need to convey the importance of the public comments (this meeting was unique – number of comments and types of comments)

- AC 21 letter/proposal:

- AC21 had meeting on March 6

- concern from some members – a primary concern/topic is seed purity (this could be

- appropriate for Crops committee – maybe a discussion document for spring 2012?)
- general feeling that the organic interests group is a minority on this committee
  - specific issues include contamination, fairness, indemnification, and representation
  - if writing a letter to the AC21, then need to focus on the important issues (like indemnification)
  - concern that a compensation program doesn't focus on preventative practices
  - this "involuntary exposure" or "pollution" of GMOs to organic producers should be responsibility of manufacturer? Producers who use it? Combination? Others?
  - how will the GMO committee support this effort and/or select a topic to write this letter?
  - the issue of seed purity is a serious concern, especially in areas where soy and corn are widely grown/produced
  - establishing a threshold on "background" vs. "contamination" – have to be clear about how we define these
  - would be helpful to have more data on levels of contamination – this could be addressed in a discussion document
- Next steps:
- take bullet points/discussion and shape them into a letter, have draft ready for review on next call

**Future Calls:**

March 21, 2012 (3pm EST) – finish/finalize mission statement, review/edit drafts of letters, prepare items for agenda for spring meeting

March 28, 2012 (2pm EST) -

Milestone	Deadline
Spring 2012 Agenda Finalized	Friday, March 23, 2012
Committee Proposals Due	Monday, April 2, 2012
Spring 2012 NOSB Meeting	May 21 – 24, 2012

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**National Organic Standards Board (NOSB)  
GMO ad-hoc Committee  
Wednesday, March 21, 2012, 3:00pm ET**

**Attending:** Zea Sonnabend (Chairperson), Jay Feldman, and Colehour Bondera, Jennifer Taylor, Mark Lipson, Mac Stone, Calvin Walker

**Absent:** Joe Dickson

**NOP Staff:** Lorraine Coke, Michelle Arsenault, and Miles McEvoy

Workplan

Project	Point Person	Status	Target Meeting
Letter; to other FACA boards, AC21, or Secretary Vilsack	Zea	Discussion document?	spring 2012
Get feedback from other committees on framework document topics	All committee members	In progress	Spring 2012?

**Agenda:**

- Finish/finalize mission statement
- Review/edit drafts of letters to Secretary Vilsack and USDA, Letter in support of AC 21
- Discussion paper on seed purity standard
- Prepare items for agenda for spring meeting

**Discussion:**

Minutes from March 7- Approved

- Finish/finalize mission statement  
Mission Statement: Chair proposes the following paragraph for consideration:  
The National Organic Standards Board believes that genetically modified organisms (GMOs) must be kept out of organic food. We accept responsibility for making recommendations that pertain to "excluded methods" to ensure that GMOs are prohibited in organic production and handling and don't contaminate organic agricultural products. 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.

Suggestion: Eliminate first sentence, start paragraph with second sentence, and keep the rest.

Chair will send out revision with minutes for review by the members.

- Review/edit drafts of letter to Secretary Vilsack (USDA)  
Draft Letter to encourage USDA to strengthen their role in preventing contamination from GMOs was sent around. The first sentence of the letter needs to be revised based on the conversation about the mission statement.

Question as to whether or not this letter should be sent as open letter to Secretary Vilsack

Letter should include intended outcomes. Right now it is not clear what the goal is, and what action the secretary should take. Members will include suggested language to make the letter stronger and include a way to open the door for further discussion. One member suggested softening the language about “the rest of the USDA...”, and changing the language in the sentence pertaining to stakeholders “conferring since 2011”. A question arose about the difference between GE and GMO. Members agreed there should be more consistency in language and to use one or the other. Change second sentence of last paragraph to read, organic farmers must no longer be held “solely” responsible. Draft letter will be posted for public comment prior to the Spring Meeting.

Group recommends that we add the letter to the Spring agenda

- Letter in support of AC 21  
Members of AC21 suggested the letter, and the chair would like to put it on the agenda for the Spring Meeting. One member didn't think it was ready, but the AC21 only has a one year charge so if the committee delays it will not get to them before they disband. An alternative could be to copy the AC21 on the letter that will be addressed to the Secretary of USDA. Potentially the AC21 could be extended. A question arose as to the committee makeup: 23 members, mixed with regard to organic and non-organic supporters. Farmers, industry, agribusiness, academics. Heavier on production industry (seeds and crops). Does not include processors.
- Discussion paper on seed purity standard  
AC21 Members prepared this initial doc and the Chair of GMO committee edited it. Will start discussion for future efforts regarding GMOs. Mmbrs need to agree whether or not this should be on the agenda for the Spring meeting, and we can edit the questions on the next call. Not sure that this fits with the mission of the NOSB. There is confusion between process standards and outcome standards. Would like feedback about genetic drift
- Prepare items for agenda for spring meeting

**Future Calls:**

March 28, 2012 (2pm EST) -

Milestone	Deadline
Spring 2012 Agenda Finalized	Friday, March 23, 2012
Committee Proposals Due	Monday, April 2, 2012
Spring 2012 NOSB Meeting	May 21 – 24, 2012

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**National Organic Standards Board (NOSB)**  
**GMO ad-hoc Committee Meeting Notes**  
**Wednesday, March 28, 2012, 2:00pm ET**

**Attending:** Zea Sonnabend (ZS) (Chairperson), Jay Feldman (JFe), and Colehour Bondera (CoB), Mac Stone (MS), Calvin Walker (CW), Joe Dickson (JD), Mark Bradley (NOP), Mark Lipson (OSEC)

**Absent:** Jennifer Taylor (JT)

**NOP Staff:** Michelle Arsenault (MA)

**Work Plan**

Project	Point Person	Status	Target Meeting
Letter; to other FACA boards, Secretary Vilsac	ZS	Discussion document	spring 2012
Get feedback from other committees on framework document topics	All committee members	In progress	spring 2012?

**Agenda:**

- Approve minutes
- Vote on Mission Statement. From last meeting:

The National Organic Standards Board accepts responsibility for making recommendations that pertain to "excluded methods" to ensure that Genetically Modified Organisms (GMOs) are prohibited in organic production and handling and don't contaminate organic agricultural products. 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.

- Vote on revised Sense of the Board letter.
- Brief discussion of content of committee's presentation at the spring NOSB meeting
- Schedule another call to continue to discuss #4.

**Discussion:**

- Minutes from March 21- Approved
- Vote on Mission Statement:  
 "The National Organic Standards Board accepts responsibility for making recommendations that pertain to "excluded methods" to ensure that GMOs are prohibited in organic production and handling and don't contaminate organic agricultural products. 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.” Motion to approve statement: CoB, seconded by JFe. Yes: 5 No: 0  
Abstain: 0 Absent: 2 Recuse: 0

- Revised “Sense of the Board letter”

Chair made some edits to document, and opened floor for discussion. Committee did some editing with regard to introductory sentence, closing sentence, the uniform use of the terms GMO vs GE, etc. “Equal burden” is bothersome terminology and some members would like to alter it. Perhaps “share the burden” is better? CoB made motion to accept this letter as a recommendation to be sent to Secretary Vilsak. Seconded by MS. Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0 ZS will rename letter-“Proposed NOSB letter to Secretary Vilsack regarding GMOs” and send via email to NOP office. MA will add return address, and NOP will forward letter to Secretary.

- Presentation Content at the spring NOSB meeting

What should be in presentation? Perhaps inputs from GMO material. Committee should look at Organic Materials Review Institute OMRI decision tree to use for information. ZS may use some of the questions from the decision tree during presentation. A member stressed that each of the standing committees should be updating and coordinating with each other, to eliminate redundancy at the Spring meeting.

Organic dairy with GMOs is something the group agreed it would like to take up in future.

**Future Calls:**

April 11 (2:00pm EDT): Continue discussion about NOSB Spring meeting presentation.

May 2 (2:00pm EDT)

Milestone	Deadline
Public Comment Period	April 9 - May 3, 2012
Spring 2012 NOSB Meeting	May 21 – 24, 2012

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**National Organic Standards Board (NOSB)  
GMO Ad-hoc Committee Meeting Notes  
Wednesday, April 25, 2012, 2:00pm ET**

**Attending:** Zea Sonnabend (ZS) (Chairperson), Jay Feldman (JFe), Colehour Bondera (CoB), Barry Flamm (BF)

**Absent:** Mac Stone (MS), Mark Lipson (OSEC), Calvin Walker (CW), Joe Dickson (JD), Jennifer Taylor (JT), Miles McEvoy (MM)

**NOP Staff:** Michelle Arsenault (MA), Mark Bradley (NOP)

**Work Plan**

Project	Point Person	Status	Target Meeting
Letter to Secretary Vilsack	ZS	Discussion document	spring 2012
Get feedback from other committees on framework document topics	All committee members	In progress	spring 2012?

**Agenda:**

- Approve minutes from March 28, 2012 call
- Report progress from other committees re: GMO issues to work on.
- Presentation outline for NOSB meeting.
- Discuss public comments

**Discussion:**

- Minutes from March 28, 2012 not yet approved. Made minor edits
- Report progress from other committees re: GMO issues to work on.
  - Crops Committee (CC) will have heavy workload with seed purity. Topic is complicated
  - Policy Development Committee (PDC). PDC felt that the general public comments re: GMOs would fall under their purview but aren't sure how they would address them. ZS felt that they would fall under the GMO ad hoc committee. Perhaps after spring meeting we can find guidance about joint committees. As for GMO ad hoc committee, the language was included 2 years ago.
  - Handling committee is discussing this
  - Materials Committee will discuss at next meeting
  - Livestock Committee is discussing this
- Presentation outline for NOSB meeting.
  - 10 minute-long presentation for NOSB Spring Meeting, composed of 5 or 6 slides.
  - 4 examples for presentation:

- Seed purity (CC)
  - Dairy feed (LC and CACC)
  - Plant breeding (CC, MC)
  - GMO affidavit: (CACC, HC)
- (JFe) With regard to # 3 on ZSs outline. (plant breeding?). Public views organic as no GMOS and JFe wants to be receptive to that. Seems public comment is more concerned with general GMO use so keeping it more general seems like a good idea. JFe feels we should make it clear that even though we are looking at specific issues, we are generally talking about GMO
- ZS will change language to include general content about keeping GMOs out of... (UREC?)
- Fear that the public will interpret gene contamination as something that is unavoidable and acceptable. Committee agreed that “acceptable and tolerable” will not be words used in conjunction with GMOs. Statement by NOP: GMOs are excluded by process
- Public comments
  - No discussion at this point as there aren’t many comments yet.
  - CoB will lead discussion at the NOSB spring meeting about the letter to Secretary Vilsack.

**Future Calls:**

May 2 (2:00pm EDT) - same agenda.

Milestone	Deadline
Public Comment Period	April 9 - May 3, 2012
Spring 2012 NOSB Meeting	May 21 – 24, 2012

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**National Organic Standards Board (NOSB)  
GMO ad-hoc Subcommittee Meeting Notes  
Wednesday, May 1 2012, 2:00pm ET**

**Attending:** Zea Sonnabend (ZS) (Chairperson), Jay Feldman (JFe), Colehour Bondera (CoB), Barry Flamm (BF), Joe Dickson (JD), Jennifer Taylor (JT)

**Absent:** Mac Stone (MS), Calvin Walker (CW),

**NOP Staff:** Michelle Arsenault (MA), Miles McEvoy (MM)

**Work Plan**

Project	Point Person	Status	Target Meeting
Letter; to other FACA boards, Secretary Vilsack	ZS	Discussion document	spring 2012
Get feedback from other Subcommittees on framework document topics	All Subcommittee members	In progress	spring 2012?

**Agenda:**

- Approve minutes from March 28, 2012
- Approve minutes from April 25, 2012
- Report about GMO issues.
- Presentation outline for NOSB meeting
- Discuss comments received about our letter to the Secretary.
- Workplan

**Discussion:**

- Minutes from March 28, 2012 approved
- Minutes from April 25, 2012 approved
- Report from other subcommittees about GMO issues.
  - The Livestock Subcommittee has identified several potential GMO issues: GMO vaccines, feed, biotech animals (currently aren't any, but there is the eventuality that there might be - for example bees.), cloning could potentially be an issue.
  - CACC: JD will put together a few bullets in place of MS.
  - CC: discussed two issues - seed purity and plant breeding, which could be put forth as either discussion documents or proposals. Also discussed process to solicit public input.
- Presentation outline for NOSB meeting: Ties together with workplan, but illustrates a longer, 5-year plan. Subcommittee made minor edits and chair will create Powerpoint slides
- Public comments received so far have not addressed the letter to the Secretary Vilsack specifically.

- Workplan –
  - NOP would like NOSB input for OIG report regarding the analysis of GE testing on organic feed and forage. NOP will report back to NOSB about the plan, perhaps at Albuquerque meeting. Chair asked if this item should be on the Subcommittee workplan and what the deadline was. NOP indicated that the target date would be the fall meeting.
  - A member asked whether this should be a joint recommendation from GMO, LC, and CACC. GMO ad hoc Subcommittee should be the umbrella Subcommittee and serve as POC.
  - JT suggested the Subcommittee review the public comments about GMOs and compile them into a discussion document and add it as a place holder on workplan. NOP asked for clarification about this discussion document and its purpose. Public comments so far have been general, but a discussion document would be a way to clarify the complex nature of the terminology of “excluded methods” and “GMO”. Chair offered to flesh out idea a bit more.

**Future Calls:**

Will reevaluate time and date to eliminate scheduling conflicts.  
 ZS will speak with JT, and MA will poll members based on JT’s availability

Milestone	Deadline
Public Comment Period	April 9 - May 3, 2012
Spring 2012 NOSB Meeting	May 21 – 24, 2012

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**National Organic Standards Board (NOSB)  
GMO ad-hoc Subcommittee Meeting Notes  
Thursday, June 14 2012, 2:00pm ET**

**Attending:** Zea Sonnabend (ZS) (Chairperson), Jay Feldman (JFe), Colehour Bondera (CoB)

**Absent:** Joe Dickson (JD), Jennifer Taylor (JT), Mac Stone (MS), Calvin Walker (CW)

**NOP Staff:** Michelle Arsenault (MA), Melissa Bailey (MB)

**OSEC Staff:** Mark Lipson (ML)

**Work Plan**

Project	Point Person	Status	Notes	Target Meeting
Seed Purity		Discussion doc	Joint w/Crops	fall 2012
Residue Testing (GM materials)		Discussion doc	Joint w/CACS?	fall 2012?
Plant Breeding		Discussion doc	Joint w/Crops	fall 2012

**Agenda:**

- Approve minutes from May 1, 2012
- Review workplan and discuss working on some topics with other committees
- Select a vice-chair

**Discussion:**

- Approval of minutes from May 1, 2012 deferred due to lack of quorum
- Workplan discussion
  - Seed purity - Chair would like to flesh out draft "Discussion Document" and discuss it in more depth on next call (July 12<sup>th</sup>). [Chair's??] Goal is to narrow the number of questions. Comments from members included a possible need for the document to address critical differences between NOP policy and what's happening in marketplace. For example, with regard to question # 4; would a seed purity standard increase, decrease, or have no impact on the impact of testing on farmers? If anonymity can be preserved, perhaps more seed companies would contribute information. A member inquired whether or not there was a government entity that could help with this. ML indicated that there is a well-established protocol for USDA's Economic Research Service (ERS) to collect proprietary data, so that part of the problem can be solved. However, funding for this would probably be an obstacle. Chair asked if it was possible to get these data by the deadline for the fall 2012 meeting (August 20). ML indicated that this process could take a year, due to work plan lead-times. Subcommittee asked if the Organic Seed Alliance (OSA) could send out the questions, and ensure anonymity and collect the data, then forward it to NOSB. MB raised the issue that data collection on behalf of the NOSB could be considered a survey and could be subject to

OMB information collection requirements – this is referenced in the NOSB PPM. MB will check into this further prior to next call.

- CBo asked who within the organic community could frame this to come up with answers. Feels this is outside NOSB's scope. AC21 was told they should frame their questions about seed purity for the new National Germplasm Resources Advisory Council (NGRAC). ZS in discussions with AC21 rep about collaborating, and will coordinate with NGRAC as well. A member suggested rewording Q # 6 for next meeting: Should a seed purity standard apply to both organic and non-organic seed?
- CBo asked for clarification about question # 8: "What testing methods are appropriate to use in order to determine and label for seed purity and to verify compliance to a seed purity standard?" He suggested that this question seemed to get at the establishment of tolerances but that leads to many more questions such as who would set these tolerances and define them, and how does this relate to labeling. The chair indicated that this discussion doc was just a way to get the conversation started. The goal is to post it for comment for the fall 2012 meeting. Subcommittee feels that the organic community is very interested in this issue. JFe indicated that we might think about tolerance levels and ask the community about this up front before diving into this topic too deeply.
- ZS has been working with AC 21, and would like to engage OMRI and OSA as well. JFe cautioned the use of outside groups prior to publishing, and that keeping questions general would be wise. Crops is working on this jointly with GMO. Will be collaborating over next few calls to get this done by fall 2012 deadline (August 20). CBo added that the process of testing needs clarification, and he would like to see a reference in the questions to how different sized seed companies and producers might be impacted. Chair asked that CBo work on language to that affect.
- Periodic Residue Testing: Chair asked about status of Final Rule on Periodic Residue Testing. MB indicated that publication of Final Guidance is approaching and she will provide an update by July 12.
- Plant breeding discussion doc: Subcommittee asked NOP status of plant breeding issues they are working on. MB indicated that NOP is working on issue of cell fusion, and was going to submit a memo to NOSB for targeted input, but NOP is now considering issuing information directly to certifiers. MB will inform the subcommittee if assistance from them on this topic becomes necessary.

OMRI decision tree policy – Ad hoc committee needs to address the question, "how far back in food chain do we look (for source of unintended GMO presence)?" OMRI has done work on this topic, and subcommittee could use this to inform process. Would like to see if other groups such as Soil Association have similar docs. MB will follow up and report back to Subcommittee.

- MB asked how GMO ad hoc subcommittee was coordinating with Livestock subcommittee on GMO vaccines. Chair noted that there are several reps from LS on the GMO ad hoc (JD, CW and CBo). CBo will discuss with others about how best to strategize. MB will coordinate

with Scott Updike (LS) to keep flow of communication between both subcommittees up to date.

- Select a vice-chair – CBo volunteered to serve as Vice Chair if no one else comes forward. No committee vote is necessary.

**Upcoming meetings and agenda items:**

2<sup>nd</sup> and 4th Thursdays at 2pm Eastern, 11am Pacific:

Note: no call June 28, 2012

July 12, 2012. Feedback from subcommittee on seed purity draft and NOP Update.

July 26, 2012

Aug 9, 2012

Aug. 23, 2012

Sept 13, 2012

Sept 27, 2012

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 13, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012
Fall 2012 NOSB Meeting – Providence, RI	October 15-18, 2012



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**National Organic Standards Board (NOSB)  
GMO ad-hoc Subcommittee Meeting Notes  
Thursday, July 12 2012, 2:00pm ET**

**Attending:** Zea Sonnabend (ZS) (Chairperson), Colehour Bondera (CoB), Jennifer Taylor (JT), Calvin Walker (CW), Joe Dickson (JD)

**Absent:** Mac Stone (MS), Jay Feldman (JFe)

**NOP Staff:** Michelle Arsenault (MA), Melissa Bailey (MB)

**OSEC Staff:** Mark Lipson (ML)

**Work Plan**

Project	Point Person	Status	Notes	Target Meeting
Seed Purity	ZS	Discussion doc	Joint w/Crops	fall 2012
Residue Testing (GM materials)		Discussion doc	Joint w/CACS?	fall 2012?
Plant Breeding	ZS	Discussion doc	Joint w/Crops	fall 2012

**Agenda:**

- Approve minutes from May 1 and June 14
- Reports from other committees on GMO issues discussed (such as GMO vaccines for livestock, seed purity for crops....)
- Seed Purity Discussion Doc - Please see Mark Lipson's revisions (attached) and summary (below) and we can discuss the points he raises.
- Begin discussion of how to proceed with Decision Tree and other evaluation method comparison towards tracing GMO back in the input/ingredient chain. Refer to OMRI decision tree sent last time (June 14) and Melissa Bailey's recent email on international standards.

**Discussion:**

- Minutes from May 1 and June 14 approved with no changes
- Reports from other committees on GMO issues
  - Crops-no update as JFe was not present.
  - Livestock - CW. MB indicated that she is in the process of creating a GM-vaccines working group (WG), which will include APHIS, as well as two NOSB members (NM and JR). The WG will hold a teleconference this month. The intention is to have an update at fall NOSB meeting
  - JT (Materials) – Interested in working with GMO ad hoc to consider excluded methods. JT will write an initial draft for the group to look at. MB stated that this is not currently on the workplan and NOP would need additional details.
  - CACS – Waiting for NOP guidance on the workplan item for residue testing - may not be on fall agenda, likely pushed to 2013.

- Seed Purity Discussion Doc
  - The group discussed suggestions from ML. ML explained his suggestion for reframing the discussion document in the context of compliance with NOP rules (i.e. excluded methods) rather than in the context of consumer expectations that the organic label is equivalent to a “GMO-free” claim. A member agreed that the comments by ML were appropriate, and would also like to see the language simplified and clarified. ZS will look at doc again, and discuss conceptually how the group might move forward. MB noted that the doc would be much more accessible if each issue was tied directly to pertinent sections of the USDA organic regulations. Currently, some of the discussion in the document involves an implied level of background knowledge. ZS would like to work with ML as she edits this doc to try to unify the two ideas. ZS’ thought is to put forth both contexts (NOP regs and consumer expectations) as drivers for the discussion. . CBo indicated that he would like to see an outline or short description to give more clarity about how a different approach would work. He noted concern that if the group takes a different approach they may run out of time to have this ready for the fall meeting. The chair noted that there is a new FACA committee (Genetic resources) and thought it would be useful for the GMO ad hoc to interface with them. MB sent doc with guidance about what the NOSB could or couldn’t ask for when attempting to collect info on testing seeds: cannot be official survey without going through OMB process. Question # 2 was discussed and MB will revise language and send it back to group. The GMO ad hoc will prepare doc and present it to the Crops Subcommittee before it is finalized. At fall meeting, GMO will take lead in presenting the discussion document.
- Decision Tree and other evaluation method comparisons towards tracing GMO back in the input/ingredient chain.
  - Issues –composting, plant breeding chain, etc. ZS is collecting info to begin what will be a long term process. MB provided the group with an international perspective although she indicated she could not find actual decision trees. MB will look for information from other entities such as KRAV (Sweden) and BioGro and forward it to the group. ZS will continue to work on this for now, but would like someone to take over. Feels that this is a long term project. OMRI indicated that there are many items in their decision tree doc that needs to be updated.
- Group requested an update from NOP on plant breeding. MB does not have any request for the GMO ad hoc to work on this issue at this time – will inform the GMO ad hoc if this changes.

**Upcoming meetings and agenda items:**

2<sup>nd</sup> and 4th Thursdays at 2:00pm Eastern, 11am Pacific:

July 26, 2012

Aug 9, 2012

Aug. 23, 2012

Sept 13, 2012

Sept 27, 2012

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 13, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012
Fall 2012 NOSB Meeting – Providence, RI	October 15-18, 2012

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**National Organic Standards Board (NOSB)  
GMO ad-hoc Subcommittee Meeting Notes  
Thursday, July 26 2012, 2:00pm EDT**

**Attending:** Zea Sonnabend (ZS) (Chairperson), Colehour Bondera (CoB), Calvin Walker (CW), Joe Dickson (JD), Mac Stone (MS), Jay Feldman (JFe), Jennifer Taylor (JT)

**Absent:**

**NOP Staff:** Michelle Arsenault (MA), Melissa Bailey (MB)

**OSEC Staff:** Mark Lipson (ML)

**Work Plan**

Project	Point Person	Status	Notes	Vote	Target Meeting
Seed Purity	ZS	Discussion doc	Joint w/Crops		Fall 2012
Residue Testing (GM materials)		Discussion doc	Joint w/CACS?		Fall 2012?
Plant Breeding	ZS	Discussion doc	Joint w/Crops		Fall 2012

**Agenda:**

- Approve minutes from July 12
- Draft 2 of the Seed Purity Discussion Document
- Future workplan item: GM prevention strategies.

**Discussion:**

- Minutes from July 12 approved with no changes.
- Chair asked that MS, JD and CW (from Livestock Subcommittee) provide an update on GMO Vaccine Task Force at next GMO ad hoc meeting (August 9), and also asked that the Crops Subcommittee review the Seed Purity Discussion Doc.
- Seed Purity Discussion Document: Group edited some language in document and suggested adding a glossary. ZS will incorporate changes and circulate the edited version (draft 3) to the members. Also asked group to reread the document and think about what terms would be useful in the glossary.
- Future workplan item: GM prevention strategies. Chair circulated doc to group about prevention strategies, which she feels is key to a process based system. The group discussed whether or not this document could be expanded to include handling, and chair asked if this was something the GMO ad hoc Subcommittee would like to include on a future workplan. NOP asked how the program would incorporate and use the information, to which ZS responded that it would not be sent forth for rulemaking, but would be intended as guidance.

**Upcoming meetings and agenda items:**

2<sup>nd</sup> and 4th Thursdays at 2:00pm Eastern, 11am Pacific:

Aug 9, 2012

Aug. 23, 2012

Sept 13, 2012

Sept 27, 2012

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 10, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012
Fall 2012 NOSB Meeting – Providence, RI	October 15-18, 2012

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**National Organic Standards Board (NOSB)  
GMO ad-hoc Subcommittee Meeting Notes  
Thursday, August 9 2012, 2:00pm EDT**

**Attending:** Zea Sonnabend (ZS) (Chairperson), Colehour Bondera (CoB), Calvin Walker (CW), Mac Stone (MS), Jay Feldman (JFe), Jennifer Taylor (JT)

**Absent:** Joe Dickson (JD)

**NOP Staff:** Michelle Arsenault (MA), Melissa Bailey (MB)

**OSEC Staff:** Mark Lipson (ML)

**Work Plan**

Project	Point Person	Status	Notes	Vote	Target Meeting
Seed Purity	ZS	Discussion doc	Joint w/Crops		Fall 2012
Residue Testing (GM materials)		Discussion doc	Joint w/CACS?		Spring 2013
Plant Breeding	ZS	Discussion doc	Joint w/Crops		Spring 2013

**Agenda:**

- Approve minutes from July 26
- Draft 3 of the Seed Purity Discussion Document
- Report on the GMO Vaccine Task Force (CBo or CW)

**Discussion:**

- The minutes from the July 26<sup>th</sup> meeting were not approved as yet.
- The Group discussed edits to the current draft of the seed purity discussion document. The chair will make the changes and recirculate the document ahead of the next call.

**Upcoming meetings and agenda items:**

2<sup>nd</sup> and 4th Thursdays at 2:00pm Eastern, 11am Pacific:

Aug. 23, 2012

Sept 13, 2012

Sept 27, 2012

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 10, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012
Fall 2012 NOSB Meeting – Providence, RI	October 15-18, 2012

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**National Organic Standards Board (NOSB)  
GMO ad-hoc Subcommittee Meeting Notes  
Thursday, August 17 2012, 2:00pm EDT**

**Attending:** Zea Sonnabend (ZS) (Chairperson), Colehour Bondera (CoB), Calvin Walker (CW), Jay Feldman (JFe), Jennifer Taylor (JT), Mac Stone (MS)

**Absent:** Joe Dickson (JD)

**NOP Staff:** Michelle Arsenault (MA), Melissa Bailey (MB)

**Work Plan**

Project	Point Person	Status	Notes	Vote	Target Meeting
Seed Purity	ZS	Discussion doc	Joint w/Crops	08 17 12	Fall 2012
Residue Testing (GM materials)		Discussion doc	Joint w/CACS?		Spring 2013
Plant Breeding	ZS	Discussion doc	Joint w/Crops		Spring 2013

**Agenda:**

- Approve minutes from July 26

**Discussion:**

- The minutes from July 26 were not discussed at this meeting.
- The GMO ad hoc group made minor edits to the format of the seed purity document prior to voting.

VOTE: Seed Purity discussion document.

Motion to adopt the seed purity discussion document

Motion by: ZS

Seconded by: CW

Yes: 6 No: 0 Absent: 1 Abstain: Recuse: 0

**Upcoming meetings and agenda items:**

2<sup>nd</sup> and 4th Thursdays at 2:00pm Eastern, 11am Pacific:

Aug. 23, 2012. Cancelled

Sept 13, 2012. Future work plan items

Sept 27, 2012



Milestone	Deadline
NOP - "Finalize" tentative agenda	August 10, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	August 27, 2012
Public comment closes	September 24, 2012
NOP - Send compiled public comments to NOSB	October 1, 2012
Fall 2012 NOSB Meeting – Providence, RI	October 15-18, 2012

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)  
GMO ad-hoc Subcommittee Meeting Notes  
Thursday, September 13 2012, 2:00pm EDT**

**Attending:** Zea Sonnabend (ZS) (Chairperson), Colehour Bondera (CoB), Calvin Walker (CW), Jay Feldman (JFe), Jennifer Taylor (JT), Mac Stone (MS),

**Absent:** Joe Dickson (JD)

**NOP Staff:** Michelle Arsenault (MA), Melissa Bailey (MB)

**Work Plan**

Project	Point Person	Status	Notes	Vote	Target Meeting
Seed Purity	ZS	Proposal	Joint w/Crops	08 17 12	Spring 2013
Residue Testing (GM materials)		Discussion doc	Joint w/CACS?		Fall 2013?
Plant Breeding	ZS	Discussion doc	Joint w/Crops		Spring 2013
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo				TBD
Tracing GMOs in Input/Ingredient Chain		Discussion doc			Fall 2013

**Agenda:**

- Approve minutes for July 26, August 9 and August 17, 2012
- Discuss Workplan for spring 2013 and beyond

Potential Workplan Items:

- Turn the Seed Purity discussion document into a Proposal
- Plant Breeding: Clarifying definitions and practices that are considered a part of excluded methods as opposed to those that are not excluded. (Joint with crops but GMO ad hoc will take lead)
- Residue testing for GM materials (GMO ad hoc input to NOP). (Joint with CACS, who will lead)
- Prevention Strategy Guidance for excluded methods in crops and handling. (mentioned on call of 7/26)

- Tracing GMOs in Input/Ingredient chain with decision trees or other evaluation methods. Work of collecting examples from Material Review Organizations (MROs) and other countries has started, but further work could be done.
- Considering excluded methods in context of sustainability. JT suggested this item and was going to write a first draft for the GMO subcommittee or the Materials subcommittee.
- Interface with GMO Vaccine Task Force as necessary.
- Start discussion of comments received on Seed Purity if there are some.

**Discussion:**

- Minutes from July 26, August 9 and August 17, 2012 approved with no changes.
- Discuss Workplan for Spring 2013 and beyond
  - Potential Workplan Items:
    - The group discussed the Seed Purity discussion document and decided to place it on the workplan as a proposal for spring 2013. Changes noted in table above.
    - Plant Breeding: Clarifying definitions and practices that are considered a part of Excluded methods and those that are not excluded. (Joint with Crops but GMO ad hoc will take lead). ZS asked if NOP's cell fusion memo will be out in time inclusion in this document. MB indicated that the memo is in clearance and should be published in later this year. MB asked that there be more elucidation of the definitions. Item was added for spring 2013 - Changes noted in table above.
    - Residue testing for GM materials (GMO ad hoc input to NOP). (Joint with CACS, who will lead). MB indicated that NOP was working on an audit response, and that this item may not need to be on the spring workplan. Changes noted in table above.
    - Prevention strategy guidance for excluded methods in crops and handling. (Mentioned on July 26 call). A question was asked as to whether or not this seem like an item that can be folded into "other" ingredients, or if it should be an individual item. CBo suggested keeping it as a separate item. MB asked that the group expound on this by putting together bullet points so NOP knows what the intention is. Changes reflected in table above.
    - Tracing GMOs in Input/Ingredient Chain with decision trees or other evaluation methods. Work of collecting examples from MROs and other countries has started, but further work could be done. This is a key question, and the goal is to inform the other Subcommittees when they are doing material reviews. The group also feels that this could be incorporated into NOP policy memo. This could be a discussion document for fall 2013
    - Considering excluded methods in context of sustainability. JT suggested this item and is going to write a first draft for the GMO Subcommittee or the Materials Subcommittee. JT was not available to discuss this issue so group will ask her offline and have an update on Executive Subcommittee call.
    - Interface with GMO Vaccine working group as necessary. Not a workplan item, but group would like to keep it at the forefront.
    - Start discussion of public comments about Seed Purity, when those are received.

**Upcoming meetings and agenda items:**

2<sup>nd</sup> and 4th Thursdays at 2:00pm Eastern, 11am Pacific:

Sept 13, 2012. Future work plan items

Sept 27, 2012

October 11, 2012 place holder

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 10, 2012
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**National Organic Standards Board (NOSB)  
GMO ad-hoc Subcommittee Meeting Notes  
Thursday, September 27 2012, 2:00pm EDT**

**Attending:** Zea Sonnabend (ZS) (Chairperson), Colehour Bondera (CoB), Mac Stone (MS), Joe Dickson (JD)

**Absent:** Jay Feldman (JFe), Calvin Walker (CW), Jennifer Taylor (JT)

**NOP Staff:** Michelle Arsenault (MA), Melissa Bailey (MB), Mark Lipson (ML) (USDA-OSEC)

**Work Plan**

Project	Point Person	Status	Notes	Vote	Target Meeting
Seed Purity	ZS	Proposal	Joint w/Crops	08 17 12	Spring 2013
Residue Testing (GM materials)			NOP feels there are no issues for the GMO ad hoc to work on at this time		
Plant Breeding	ZS	Discussion doc	Joint w/Crops		Spring 2013
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo				Beyond 2013
Tracing GMOs in Input/Ingredient Chain		Discussion doc			Fall 2013

**Agenda:**

- Approve notes from last call (September 13)
- Discuss comments received on Seed Purity
- Set call if necessary

**Discussion:**

- Notes from last call September 13 approved with no changes

- Group discussed briefly the public comments about the Seed Purity discussion document. In general, there was a divergence in opinion among the letters they received.

**Upcoming meetings and agenda items:**

2<sup>nd</sup> and 4th Thursdays at 2:00pm Eastern, 11am Pacific:

Sept 13, 2012. Future work plan items

Sept 27, 2012

October 11, 2012

Milestone	Deadline
NOP - "Finalize" tentative agenda	August 10, 2012
Fall 2012 proposals due to NOP	August 20, 2012
NOP - Post proposals, Publish FRN, Open public comment	August 27, 2012
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Fall 2012 NOSB Meeting – Providence, RI	October 15-18, 2012