

be used to achieve a workable outcome. OGC agrees with this perspective and therefore, does not support the addition of gibberellic acid to the National list for postharvest use on bananas.

Furthermore, OGC shares the Handling Committee's concerns about the damage caused by gibberellic acid post-harvest to the nutritive quality of citrus and therefore agree with the Committee that the material is not appropriate for postharvest use on citrus. OGC also agrees that the petition does not make a convincing argument that gibberellic acid is needed for shipment of organic pineapples, and our own experience with handling this fruit confirms that gibberellic acid is not needed for this use.

## **GMO LETTER & GMO AD-HOC COMMITTEE**

Organically Grown Company (OGC) supports the NOSB's intent to communicate directly with the US Department of Agriculture (USDA) Secretary, Vilsack, about the serious public concerns brought before the Board regarding potential for contamination of organic systems by GMOs. Timely action by the USDA to implement policies that protect organic farmers and the organic supply chain are critical to the integrity of the organic seal and consumer confidence.

We fully support the Ad Hoc GMO Committee's letter on March 28, 2012 which asserts that "the USDA's actions to date on genetically engineered crops have been insufficient to protect the organic industry" We also strongly agree with the Committee's judgment that "the responsibility to prevent GMO contamination of organics is shared by those who develop, use, and regulate this technology."

We urge the NOSB to approve the letter and send it to the Secretary at the earliest opportunity.

OGC is pleased to see the establishment of an NOSB Ad Hoc Committee on GMOs to help organic producers and handlers avoid contamination across the supply chain, we also believe strongly that the developers and users of GMO technology must be held *primarily* accountable for preventing contamination of organic. OGC believes that current methods of regulating GMOs result in the organic food industry carrying an unfair burden to prevent contamination, which in turn, places organic producers and all businesses that purchase, handle, process and sell organic products under constant threat of market and livelihood losses.

Thank you for your consideration of our comments.

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