Comment Submitted By: Jim Schweigert, Vice President of Business Development, Gro Alliance, LLC – Cuba City, WI

Gro Alliance, LLC is the nation's largest, independent contract seed corn production company. We produce seed in five states and have seed production locations in Wisconsin, Indiana and Illinois. We are unique in the industry in that the vast majority of our seed production contains GMOs traits, yet we are also certified organic, produce non-GMO seed corn for international markets, produce popcorn seed and alternative endosperm color corn such as white, etc. Our operations are ISO 9001:2008 certified.

Every hybrid we produce has various purity standards in regards to genetic purity, GMO trait purity or non-GMO purity. In each case, we put together a comprehensive plan for crop isolation using a combination of distance, favorable male pollen load and pollination timing to minimize potential exposure from a non-desired corn pollen source. For certain requirements, this isolation is fairly minimal, but in other cases, the isolation practices must be very robust. In either case, with enough lead time to identify the proper fields and farming practices (such as crop rotation or tillage practices) we feel confident that we can meet the standards set for each particular hybrid. Specifically, to the issue at hand, with enough lead time and proper compensation for more aggressive isolation and seed segregation practices, Gro Alliance is confident it can produce organic seed to a none found in 3,000 seed standard. To transition to that standard will take time. The current industry models are designed to allow 1-2 percent non-desirable pollen, so fields with much greater isolation from other corn pollen and potentially a separate, dedicated ear corn drying and conditioning facility will need to be established to ensure the purity of the none found in 3,000 seed sample remains intact from the seed production field to the farmer's bag of organic seed.

In the current industry paradigm, none found in 3,000 is a very hard standard to meet, but with a clear testing protocol, time to make the necessary production practice adjustments and organic buyers willing to compensate organizations for such adjustments, the none found in 3,000 seed standard can be met in seed corn.