



Advancing the ethical development and stewardship of seed

Comments in Response to the NOSB GMO Subcommittee Discussion Document on Excluded Methods

At this time we do not believe the definition of “excluded methods” should be revised. Following data collection, the NOSB and NOP should instead consider clarification through guidance documents and policy statements. Data collection should include surveying companies that supply the organic sector to better understand the breeding methodologies currently in use. Additionally, data should be collected to gauge which varieties developed through methodologies in question are heavily relied upon by organic farmers and whether sufficient alternatives exist. Lastly, guidance documents (or other actions) should prioritize methodologies for which there remains questions or disagreement that potentially impact the credibility of the organic seal.

Organic Seed Alliance has reviewed the GMO subcommittee’s discussion document on excluded methods. We believe that before any decisions can be made, or guidance is provided, OSA and other organic community members need to understand the extent these methodologies are used and the potential implications any definition changes may have on farmers and their access to appropriate seed. This discussion document also raises the important and bigger question of which principles and ethics should govern organic plant breeding. Organic plant breeding has yet to be clearly defined.

Getting quality feedback from diverse stakeholders is difficult yet imperative to understanding the issues and impacts of policy decisions. The discussion document as written is daunting, and likely intimidates those in the organic community who lack the expertise for responding in a meaningful way. We offer the following questions and suggestions for moving this discussion forward.

For starters, some of the methodologies described in the discussion document are more contentious than others. It’s important to first identify and prioritize discussion around definitions for which there are pressing questions and conflicting opinion. This would simplify the process and likely encourage broader participation. This process should also include looking at international standards and discussions on these topics, both to learn from their experiences as well as identify opportunities for consistency.

Second, it is important to understand the extent these methodologies are currently used for producing seed planted in certified organic systems. Examining data on crop varieties called into question due to this excluded methods discussion is necessary for answering the questions outlined in the document. Equally as important is data on whether alternatives exist in sufficient quantities.

We recommend surveying seed companies that supply the organic sector to gauge (1) breeding methodologies used, and (2) which varieties in catalogues and in their pipeline are developed using methodologies in question. In other words, we need to understand the lay of the land: How would definition changes affect the seed supply? What problems do seed developers foresee? How easy would it be to shift current breeding approaches



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and under what timeline? Seed developers may view this information as sensitive. The data could be collected anonymously.

Third, the organic community needs to understand how the state of seed availability as described above overlaps with farmers' reliance on varieties in question. If the organic community decides to "pull the plug" on certain methodologies currently used in organic seed development, we need to have a reasonable timeline for phasing out these methods in the organic seed sector to avoid economic hardships for organic farmers.

The overarching question remains: What are the principles that guide organic plant breeding? And where do we as an organic community draw the line? Beyond creating biological standards, we must remain committed as an organic community to fostering seed systems that respond to organic farmers' needs, encourage organic farming practices, and minimize risks from certain technologies. This discussion is bigger than biological frameworks, and should include a meaningful dialogue on principles and ethics guiding organic seed development.

Lastly, we recommend that this topic include a discussion on appropriate intellectual property models for governing products of organic plant breeding. For example, we view utility patents on genetics as inconsistent with the principles and spirit of organic, since they interfere with efforts to improve crops for organic agriculture, including on-farm innovation. The NOSB should examine what measures can be taken to encourage appropriate intellectual property practices that foster fair access to genetics.