



October 26, 2016

Ms. Michelle Arsenault  
Advisory Committee Specialist  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave. SW  
Room 2642-S, Mail Stop 0268  
Washington, DC 20250-0268  
Docket: AMS-NOP-16-0049

Re: Notice of Meeting of the National Organic Standards Board

Dear Ms. Michelle Arsenault and members of the National Organic Standards Board:

Founded in 1883, the American Seed Trade Association (ASTA) represents over 700 member companies involved in seed production and distribution, plant breeding, seed treatment and related industries in North America. ASTA's mission is to enhance the development and movement of quality seed worldwide. Our members produce seed for row crops, vegetables, grasses, and cover crops, and for conventional, GE, and organic seed markets. ASTA has actively participated in the seed purity discussion at the NOSB and as part of the USDA's co-existence efforts. Once again, we welcome the opportunity to submit comments on behalf of the US seed industry for your review.

In April, the NOSB created a seed purity task force. This group has identified several research topics to investigate. ASTA applauds the task force's focus as it investigates seed purity further. The crop-by-crop approach taken by the NOSB is the best use of their resources. This allows NOSB to address self-identified at-risk crops, without spending NOSB resources on crops where seed purity is not a concern.

The NOSB's task force has identified two topics of importance to the US seed industry: the integrity of breeding lines, and methods to maintain genetic purity. ASTA continues to encourage the NOSB to urge the USDA and Congress to increase financial support for the National Plant Germplasm System (NPGS). Like plant breeders striving to produce new, improved varieties for all production types, breeders continually access varieties from the NPGS to produce seed favorable to organic production. It is critical for the NPGS to have the resources to maintain collections and to ensure trueness to type for all of accessions. In addition, the NPGS is expertly trained to maintain genetic purity among its vast collection, including its 70,000 corn samples.

Many of the prevention strategies proposed by the NOSB could have a positive impact on maintaining genetic purity. ASTA supports the task force's efforts to investigate how many buffer rows provide optimal protection from genetic drift without adding unnecessary burdens to producers. Similarly, educating farmers on how to cleanout farm implements and then quantitatively determining the amount of off-type reduction experienced is critical. GMOs in organic agriculture can happen at many



different places in the production and supply chain. Efforts to determine and mitigate risk at the highest risk points are critical for organic agriculture moving forward.

ASTA continues to support the task force's efforts, and we welcome the opportunity to provide necessary background information as needed by the NOSB.

Sincerely,

Andrew W. LaVigne

President & CEO