

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, January 10 2013, 2:00pm EDT**

Attending: Jennifer Taylor (JT) (Chairperson), Zea Sonnabend (ZS) (Vice- Chairperson), Colehour Bondera (CoB), Jay Feldman (JFe)

Absent: Jean Richardson (JR)

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
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	Discussion doc	Joint w/Crops		Spring 2013
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc			Beyond 2013
Tracing GMOs in Input/Ingredient Chain		Discussion doc			Fall 2013
Residue Testing (GM materials)			NOP feels there are no issues for the GMO ad hoc to work on at this time		N/A

Agenda:

- Discussion of workplan (seed purity)
- Terminology for Excluded Methods (formerly Plant Breeding)
- Prevention Strategy Guidance for Excluded Methods in Crops and Handling (Jay, Colehour)
- Other issues: Research priorities list, Experts

Discussion:

- Seed Purity The lead person would like to solicit feedback and help from the rest of the group and discuss this on a future call. JFe and CBo will collaborate on this workplan item. Members noted that this will be an ongoing project, so the short term goal is to choose smaller pieces to discuss at the spring 2013 meeting. ML noted that there seemed like there wasn't a lot of data

from the seed companies and asked if the docket from the fall 2012 meeting was still open and available for public comments. It was verified that the docket is closed and people can no longer comment, but once the document is revised and posted for the spring 2013 meeting the public can comment. ZS and ML noted that they will be attending the Organicology conference in Portland, OR in February and will report back to the Subcommittee. ML also offered to resend the AC21 findings to the group for reference, which was done just after the meeting ended.

- The Chair will ask the NOSB Chair on the ES call tomorrow about adding additional members to this Subcommittee.
- Terminology for Excluded Methods (formerly Plant Breeding) - ZS is interested in members' thoughts, and what questions should be posed for public comment, and whether or not this should be put forth for a rule change or just guidance. The group made minor edits to the text in the document and discussed the neutrality of some of the questions. They also discussed ideas for soliciting public comment and gathering the types of data that would be useful to move this document forward. NOP added that the vaccine working group has some overlapping issues on this topic and that it may share a draft document with this and the Livestock subcommittee at a future date. A member offered some comments about various components of the document, and noted that this topic seems broader and more complex. The general consensus was that the guiding principles behind the document are not very clear and need to be elucidated, which is a sentiment that was echoed by ML. ZS asked the group to send her additional questions to include, as well as a list of suggested experts (names and email addresses) to which they can send the document for feedback. ZS will then resend the document with the edits in track changes so the group can review it.
- Prevention Strategy Guidance for Excluded Methods in Crops and Handling – members had some initial discussions about what this topic would address - best practices versus policy changes. The NOP would need additional information to understand what the Subcommittee would work on with respect to this guidance. The motivation for keeping this item on their list was to keep GMO topics visible at each meeting. The group then discussed putting this particular topic on hold for now and will talk further on future calls. A member suggested adding this topic to the research priorities.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm Eastern, 11am Pacific:

January 10, 2013

January 24, 2013

Continue discussion of Terminology for Excluded Methods (formerly Plant Breeding)

February 14, 2013

February 28, 2013

March 14, 2013

March 28, 2013

Spring 2013 Milestones	Target date
NOP – Complete tentative agenda	February 8, 2013
Spring 2013 proposals due to NOP	February 12, 2013
NOP - Post proposals, Publish FRN, Open public comment	February 19, 2013
Subcommittees submit tentative workplans to NOP	March 1, 2013
Discuss workplans on ES call	March 8, 2013
NOP provides written comments on workplans to NOSB	March 11, 2013
Public comment closes	March 19, 2013
NOP - Send compiled public comments to NOSB	March 25, 2013
Workplans finalized on ES call	March 29, 2013
Spring 2013 NOSB Meeting – Portland, OR	April 8-11, 2013

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**National Organic Standards Board (NOSB)
GMO ad-hoc Subcommittee Meeting Notes
Thursday, January 24 2013, 2:00pm EDT**

Attending: Jennifer Taylor (JT) (Chairperson), Colehour Bondera (CoB), Jay Feldman (JFe), Jean Richardson (JR), Calvin Walker (CW), Francis Thicke (FT)

Absent: Zea Sonnabend (ZS) (Vice- Chairperson), Mark Lipson (ML) (USDA-OSEC), Melissa Bailey (MB) (NOP staff)

NOP Staff: Michelle Arsenault (MA), Emily Brown Rosen (EBR)

Work Plan

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

Agenda:

- Approve notes from January 10th call
- Seed Purity Document and next steps
- Review Terminology for Excluded Methods (formerly Plant Breeding)
- Prevention Strategy Guidance for Excluded Methods in Crops and Handling (JFe, CBo)
- GMO ad hoc issues: Research priorities list, Experts
- Additional items?

Discussion:

- Notes from January 10th call deferred to the next call for approval

- Seed Purity Document: JFe and CBo are currently working on the document and JFe noted that there are a couple of upcoming conferences where this will be a topic of discussion. He added that he has spoken to various stakeholders and it seems there isn't a consensus, but the group feels they should pursue this but not move forward yet with a testing standard. The GMO ad hoc Subcommittee would like to define issues as they understand them and identify a process before moving forward. A member noted the need for the knowledge of contamination levels before proceeding. Members and the NOP discussed the options for this document, which included an update at the spring meeting, re-posting it as a discussion document to elicit more comments, or waiting to put forth a proposal with more definitive suggestions. One member noted that proposals with specific changes are more likely to generate comments than a general discussion document. Members discussed setting a process to stay engaged in this issue, with the notion that if they don't, others will fill the void and dictate the standards by which "contamination" is classified. The members feel strongly that the NOSB should stay engaged and not be silent on this issue. One member noted that the discussion about the GMO definition will definitely impact this policy as well, and also expressed concern about the impact of a seed testing requirement on those who save seeds. The Chair suggested the possibility of asking someone from the Organic Seed Alliance to participate in a call, but another member didn't think this would be the right time, as they are in the data collection phase. The group will continue crafting the document and will determine on the next call whether or not it will be an update, discussion document or a proposal.
- Review Terminology for Excluded Methods (formerly Plant Breeding) –the Chair circulated the last version of the document (ExcludedMethodsDiscussionDoc-draft1), which does not contain edits made during the Jan. 10 call. One member noted the technical nature of the document and was not certain how this impacted the overall interpretation of excluded methods. Another strongly supported the clarification of terms based on current science, and noted the importance of comparing the excluded methods vaccines document and the excluded methods definition document, and urged the two Subcommittees (GMO ad hoc and Livestock) to work together so when these two items are presented at the spring meeting they are in sync. JFe asked about a comment in the document about the NOP clarifying a statement about cell fusion. The Chair asked that the members send any thoughts and comments to ZS. Additionally, members noted that the date is missing from the document. A member suggested perhaps getting reviews from molecular biologists.
- Prevention Strategy Guidance for Excluded Methods in Crops and Handling (JFe, CBo) - delayed until next call for lack of time
- GMO ad hoc issues: Research priorities list, Experts - delayed until next call for lack of time

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm Eastern, 11am Pacific:

January 24, 2013

Continue discussion/vote of Terminology for Excluded Methods (formerly Plant Breeding)

January 31, 2013 2:00pm EST– Additional call to discuss/vote on Terminology for Excluded Methods (formerly Plant Breeding)

February 6, 2013 1:00pm EST– Additional call

February 14, 2013

February 28, 2013

March 14, 2013

March 28, 2013

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NOP – Complete tentative agenda	February 8, 2013
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Subcommittees submit tentative workplans to NOP	March 1, 2013
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Public comment closes	March 19, 2013
NOP - Send compiled public comments to NOSB	March 25, 2013
Workplans finalized on ES call	March 29, 2013
Spring 2013 NOSB Meeting – Portland, OR	April 8-11, 2013

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**National Organic Standards Board (NOSB)
GMO ad-hoc Subcommittee Meeting Notes
Thursday, January 31 2013, 2:00pm EDT**

Attending: Jennifer Taylor (JT) (Chairperson), Zea Sonnabend (ZS) (Vice-Chairperson), Colehour Bondera (CoB), Jay Feldman (JFe), Francis Thicke (FT)

Absent: Melissa Bailey (MB) (NOP staff), Jean Richardson (JR), Calvin Walker (CW)

NOP Staff: Michelle Arsenault (MA), Emily Brown Rosen (EBR), Mark Lipson (ML) (USDA-OSEC)

Work Plan

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

Agenda:

- Review and approve January 10 & 24 notes
- Discuss seed purity docs
- Discuss Excluded Methods Document
- Workplan Focus Research Priorities Items
- Discuss potential experts for call and meeting
- Additional Issues

Discussion:

- Notes from January 10 call approved with no changes

- Notes from January 24 call approved with no changes
- Seed purity: The discussion began with the question about how to proceed with this document, in light of the fact that it is still under discussion in the larger community. A member noted that there are ongoing conversations, many of which will occur at various upcoming meetings, such as Organicology in February 2013. The consensus among the members is that it useful and desirable for the NOSB to invite dialogue about this issue, and would like to impress upon people that the NOSB is considering this issue. ZS indicated that she would like to have time on the spring agenda for an update about the current status. Another option would be to repost the past discussion document to elicit more feedback, and to outreach to the community to ensure the NOSB receives feedback. ZS is compiling a list of experts to notify when the docket is open for comment, and welcomed input from others. The group agreed the best option would be to re-issue it as a discussion document, with a preamble note indicating more comments are welcome (change was made to table above).
- Excluded Methods Document – ZS made some edits based on feedback received from the other members and the NOP. EBR suggested a couple of additional questions including whether or not the NOSB should work on standards for organic plant breeding. Members discussed the questions contained in the document and how to better phrase them, as well as the inclusion of other questions that they may ask. ZS asked for feedback by Monday Feb 4. The group also discussed the coordination of the Excluded Methods document with that of the GM vaccines Working Group document being considered in the Livestock Subcommittee, but the NOP feels that because they are very different discussions, that may be difficult. The members will continue the discussion about this on next call after reading the GM vaccine document more closely, with the goal of making the docs more parallel. A member added that he felt the documents are quite similar, and that the goal of both is to define Excluded Method for two different audiences (Agriculture and Medicine). The group will continue to edit various parts of the document and distribute it prior to the next call in preparation for voting.
- The Chair asked that members keep future workplan items in their sights
- The members discussed inviting experts, such as plant breeders and molecular biologists, to sit in on calls, but thought that the spring 2013 meeting would be too soon. ML offered to send ZS some references for experts in molecular biology/plant breeding.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm Eastern, 11am Pacific:

January 31, 2013 2:00pm EST - Additional call

Discuss/vote on Terminology for Excluded Methods (formerly Plant Breeding)

February 6, 2013 1:00pm EST– Additional call

Continue discussion/vote on seed purity document

Continue discussion/vote on Excluded Methods document

February 14, 2013

February 28, 2013

March 14, 2013

March 28, 2013

Spring 2013 Milestones	Target date
NOP – Complete tentative agenda	February 8, 2013
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**National Organic Standards Board (NOSB)
GMO ad-hoc Subcommittee Meeting Notes
Thursday, February 6, 2013, 1:00pm EDT**

Attending: Jennifer Taylor (JT) (Chairperson), Colehour Bondera (CoB), Jay Feldman (JFe), Francis Thicke (FT), Jean Richardson (JR), Calvin Walker (CW), Mac Stone (MS), Zea Sonnabend (ZS) (Vice-Chairperson)

Absent: none

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

Work Plan

Project	Point Person	Status	Notes	Vote	Target Meeting
Seed Purity	ZS	Discussion doc	Joint w/Crops. GMO is lead. Original vote 08 17 12	02 06 13	Spr 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	Discussion doc	Joint w/Crops. GMO is lead.	02 06 13	Spr 2013
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc			Beyond 2013
Tracing GMOs in Input/Ingredient Chain		Discussion doc			Fall 2013
Residue Testing (GM materials)			NOP feels there are no issues for the GMO ad hoc to work on at this time		N/A

Agenda:

- Review and approve January 31 notes
- Continue discussion/vote on seed purity document
- Continue discussion/vote on Excluded Methods document
- Additional Issues
- Workplan
- Research Priorities Items
- Experts- consider experts for call and meeting

Discussion:

- Approval of the notes from January 31 call postponed until next call.
- Seed purity document – The group made some minor grammatical changes and proceeded to vote. FT noted that he also had some minor edits and would send those to the group via email after the call.

Motion to adopt the discussion document “GMOs and Seed Purity”:

Motion by: CBo

Seconded by: JT

Additional discussion: none

Yes: 7 No: 0 Absent: 0 Abstain: 0 Recuse: 0 (ZS was not present on call for this vote. Her vote was cast via email and added to final vote count above-ma)

- Terminology on Excluded Methods. The group feels that the document is ready to be voted on but a member asked that the vote be held via email so ZS could also vote. The members discussed some language in the document and made some edits to various sections. ML suggested adding some language to Question # 5 (page 10) about breeding lines. “How far back into development...of substance, for the lineage of a breeding line, should the excluded methods prohibitions apply”. JFe had some minor changes to the 3rd sentence of the first paragraph in the document. A member and the NOP suggested adding some references and citations, which MB will add. ML asked if this was intended to be an update or a discussion document, and the group consensus is that the intent is as a discussion doc. ML asked if the group discussed potential consequences of the fact that the NOSB is raising questions about excluded methods, and noted that he just sent a document to the members via email regarding a new EU paper on emerging breeding technologies. Members agreed that this paper is interesting and informative, but if they were to review it and perhaps incorporate information from it, they would have to withdraw the discussion document to do so. MB will make all the edits on her copy of the document and will then send it to the group.

Motion to adopt Excluded Methods discussion document as edited today:

Motion by: JR

Seconded by: CBo

Additional discussion: CBo reiterated what JR said about the EU paper.

Yes: 7 No: 0 Absent: 0 Abstain: 0 Recuse: 0 (ZS joined call in time to vote)

A member asked that the edited doc get sent to ZS so she can submit any further edits.

- Additional items - ML gave the group an update about a new USDA Advisory Committee called the National Germ-plasm Resources Advisory Committee, which will advise the Secretary on management of germ-plasm and seed breeding resources. The first meeting is scheduled for March 5 – 6, 2013.
- The February 14th meeting was cancelled since two extra calls were added prior to the proposal submission deadline.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm Eastern, 11am Pacific:

January 31, 2013 2:00pm EST - Additional call

Discuss/vote on Terminology for Excluded Methods (formerly Plant Breeding)

February 6, 2013 1:00pm EST– Additional call

Continue discussion/vote on seed purity document - done

Continue discussion/vote on Excluded Methods document - done

February 14, 2013 - cancelled

February 28, 2013

March 14, 2013

March 28, 2013

Spring 2013 Milestones	Target date
NOP – Complete tentative agenda	February 8, 2013
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**National Organic Standards Board (NOSB)
GMO ad-hoc Subcommittee Meeting Notes
Thursday, February 28, 2013, 1:00pm ET**

Attending: Jennifer Taylor (JT) (Chairperson), Colehour Bondera (CoB), Jay Feldman (JFe), Francis Thicke (FT), Zea Sonnabend (ZS) (Vice-Chairperson)

Absent: Jean Richardson (JR), Calvin Walker (CW), Mac Stone (MS), Mark Lipson (ML) (USDA-OSEC)

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

Work Plan

Project	Point Person	Status	Notes	Vote	Target Meeting
Seed Purity	JFe/CBo	Discussion doc	Joint w/Crops. GMO is lead. Original vote 08 17 12	02 06 13	Spr 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	Discussion doc	Joint w/Crops. GMO is lead.	02 06 13	Spr 2013
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc			Beyond 2013
Tracing GMOs in Input/Ingredient Chain	ZS	Discussion doc			TBD
Residue Testing (GM materials)			NOP feels there are no issues for the GMO ad hoc to work on at this time		N/A

Agenda:

- Review and approve notes for January 31, 2013 and February 06, 2013
- Work Plan Topics and Development
- Research Priorities
- Public comments
- Additional issues

Discussion:

- Notes from January 31, 2013 call approved with no changes
- Notes from February 6, 2013 call approved with no changes

- Work Plans
 - Seed Purity - Future work will be based on the outcome at spring meeting
 - Terminology for Excluded Methods - Future work will be based on the outcome at spring meeting, and the group thought it likely that they would issue a second discussion document for the fall 2013 meeting.
 - Members briefly discussed the report that ML circulated entitled EU report from the New Techniques Working Group about bio techniques
 - Tracing GMOs in input/ingredient chain. ZS will take lead and welcomed others to help. Noting that the Terminology for Excluded Methods project needs to be further along before they can begin this project. The NOP supports this plan. The workplan table above was edited to reflect these changes.
 - Prevention Strategy Guidance for Excluded Methods in Crops and Handling. NOP asked for clarity about what the problem is and what would be addressed, and asked that a member outline this information for the next ES call
- Follow up on existing item: Terminology for Excluded Methods. ZS is collecting names for the list of people to send the Excluded Methods Terminology. She indicated that she already sent the document to several people with instructions about submitting written comments, and asked for suggestions from other members for additional recipients.
- A member added that they thought the role of the GMO ad hoc Subcommittee was to interact with the other Subcommittees, since GMOs is an overarching topic. So, rather than take on new workplan items, perhaps it would be better to concentrate on the current items and engaging the other Subcommittees.
- Research priorities-
 - Potential workplan item: Addressing the lack of knowledge about how much GMO contamination there is.
 - Chair asked about writing a potential document supporting the choice to grow or purchase non-GMO products. The group discussed what this would address, how it would be presented, and what aspects would be needed for such a document, for example independent research. ZS asked that the Chair incorporate comments from the members into a one-page document for the rest to read, in order to determine if this should be added to the workplan.
 - A member asked if the AC21 group will be continuing to work. MA will ask ML about the mandate and the meeting schedule. Note: ML indicated the AC21 was re-chartered, but they do not yet have a mandate nor have any meetings been scheduled.
 - Emily Brown Rosen (NOP staff) will substitute for Melissa on the March 14th call. MA will make sure she receives the agenda.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

February 14, 2013 - cancelled

February 28, 2013 2:00pm ET

Workplans

March 14, 2013 2:00pm ET

March 28, 2013 2:00pm ET

Spring 2013 Milestones	Target date
NOP – Complete tentative agenda	February 8, 2013
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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, March 14, 2013, 1:00pm ET**

Attending: Jennifer Taylor (JT) (Chairperson), Colehour Bondera (CoB), Jay Feldman (JFe), Francis Thicke (FT), Zea Sonnabend (ZS) (Vice-Chairperson), Jean Richardson (JR)

Absent: Calvin Walker (CW), Mac Stone (MS), Mark Lipson (ML) (USDA-OSEC), Melissa Bailey (MB) (NOP staff)

NOP Staff: Michelle Arsenault (MA), Emily Brown Rosen (EBR) (NOP staff)

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Tracing GMOs in Input/Ingredient Chain	ZS	Discussion doc			Fall 2013
Residue Testing (GM materials)			NOP feels there are no issues for the GMO ad hoc to work on at this time		N/A

Agenda:

- Review and approve notes for February 28, 2013
- Work Plan Topics
- Public comments and presentations
- Additional issues
- Meeting Adjourned

Discussion:

- Notes from the February 28, 2013 call were approved with one minor change to the table above: the addition of JFe/CBo to the Seed Purity workplan item.
- There was no additional discussion of workplan items
- Public comments and presentations - the group discussed the public comments received, noting that there haven't been any comments specific to the discussion documents yet. The Chair asked that the members presenting the discussion documents let MA know on the Monday prior to the meeting the format that will be projected at the 2013 Spring meeting (i.e. Powerpoint, Word doc, etc)
- The group briefly discussed the public comment schedule noting the number of people that have signed up so far (~100)
- The meeting was adjourned

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

February 28, 2013 2:00pm ET
Workplans

March 14, 2013 2:00pm ET
March 28, 2013 2:00pm ET

Spring 2013 Milestones	Target date
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GMO ad hoc Subcommittee Meeting Notes
Thursday, March 28, 2013, 1:00pm ET**

Attending: Jennifer Taylor (JT) (Chairperson), Colehour Bondera (CoB), Francis Thicke (FT), Zea Sonnabend (ZS) (Vice-Chairperson), Calvin Walker (CW), Mac Stone (MS), Jean Richardson (JR), Jay Feldman (JFe)

Absent: none

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

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Residue Testing (GM materials)			NOP feels there are no issues for the GMO ad hoc to work on at this time		N/A

Agenda:

- Review and approve notes for March 14, 2013
- Seed Purity Discussion Document
- Public comments/presentation for Seed Purity document (CBo, JFe)
- Public comments/presentation for Terminology for Excluded Methods Discussion Document (ZS)
- General Public Comments
- New Items
- Michelle- please provide any updates
- Additional Discussion
- Meeting Adjourned

Discussion:

- Notes from the March 14, 2013, call were approved with no changes
- Public comments/presentation for Terminology for Excluded Methods Discussion Document (ZS). The NOSB received lots of comments about excluded methods including information about what other countries are doing. The group feels that this will be a great candidate for an open docket if the Board passes the public communications proposal.
- The group discussed the receipt of many general comments that pertain to GMOs, and would perhaps like to summarize those and address it at the meeting.
- Seed purity - ZS noted that there were several significant comments that will help to inform the progress going forward.
- Group would like to keep the two discussion documents (Seed Purity and Terminology for Excluded Methods) on the workplan without necessarily specifying if they are discussion documents or proposals, as they are unsure at this point what form they will take.
- ML noted that the AC 21 recommendation included seed purity and indicated that the timing is difficult because the intention was to complete this before the end of the fiscal year.
- MB noted that she keeps the Agricultural Marketing Service abreast of what the NOSB is doing, and also the AC21 group, so it is a coordinated effort.
- MA will send the results from the AC21 to the members, once ML sends it to her.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

March 14, 2013 2:00pm ET

March 28, 2013 2:00pm ET

Spring 2013 Milestones	Target date
NOP – Complete tentative agenda	February 8, 2013
Spring 2013 proposals due to NOP	February 12, 2013
NOP - Post proposals, Publish FRN, Open public comment	February 19, 2013
Subcommittees submit tentative workplans to NOP	March 1, 2013
Discuss workplans on ES call	March 8, 2013
NOP provides written comments on workplans to NOSB	March 11, 2013
Public comment closes	March 19, 2013
NOP - Send compiled public comments to NOSB	March 25, 2013
Workplans finalized on ES call	March 29, 2013
Spring 2013 NOSB Meeting – Portland, OR	April 8-11, 2013

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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, May 9, 2013, 2:00pm ET**

Attending: Jennifer Taylor (JT) (Chairperson), Jay Feldman (JFe), Colehour Bondera (CoB), Zea Sonnabend (ZS) (Vice-Chairperson), Francis Thicke (FT), Calvin Walker (CW), Mac Stone (MS), Jean Richardson (JR)

Absent: Mark Lipson (ML) (USDA-OSEC)

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

Work Plan

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO is lead. Proposal Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO is lead. Proposal Joint w/Crops.		Fall 2013
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Review/approve notes from March 28, 2013
- Discuss spring meeting *Comments/issues that should be brought to the attention of subcommittee.
- Work Plan proposed topics, impact of public comments, direction for fall 2013:
 - Excluded methods terminology discussion document (ZS)
 - Seed purity discussion document (CBo and JFe)
 - Other items on Work Plan
 - Research Priorities Development- items from spring meeting?
- Public Comments
- Comments from Michelle (please include update public communication docket system)
- Comments from NOP

- Discussion
- Meeting Adjourned

Discussion:

- Notes from the March 28, 2013 call approved with no changes
- Spring meeting feedback. The members didn't have any specific comments or feedback from the spring meeting regarding the GMO ad hoc Subcommittee.
- Work plan proposed topics, impact of public comments, direction for fall 2013:
 - Excluded methods terminology discussion document (ZS). The group discussed the next steps in light of the comments received at the spring meeting. The comments were varied and members felt that some of the commenters misinterpreted some aspects of the document so the GMO ad hoc Subcommittee would like to wait until the NOSB has a comment period open in order to solicit additional comments. A member asked about specific items within this document that might be completed as top priority. Vaccines was discussed as an important issue needing resolution. The lead reviewer is targeting mid-July and will be coordinating with the Vaccines Made with Excluded Methods VMWEM Working Group who will also have an update at approximately the same time.
 - Seed purity discussion document (CB and JFe). The group discussed the notion that the marketplace seems to be getting ahead of the policy, and how the NOSB could and would participate in that process. Members suggested a couple of ways in which the NOSB may weigh in. The NOP will talk with ML about the potential for an ERS (Economic Research Service) survey that could provide data to advance this discussion, and will report back on next call. To address the concerns of GMO contamination of breeding parent lines, the Subcommittee might want to interface with the FACA Board on protecting germplasm (USDA National Genetic Resource Advisory Council (NGRAC)
 - Research Priorities Development - Members discussed adding gene flow and genetic drift to the research priorities list as a priority topic. JFe offered to write up a document with a meta-analysis/survey of the literature currently available as a baseline to discuss the next steps. The members enthusiastically supported JFe taking on this project.
- Public Comments – there was no additional discussion of public comments
- Public communication docket system update - The NOP is discussing various tools for the Public Docket Management system, but doesn't have any new information at this time.
- Meeting Adjourned

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

May 9, 2013 2:00 ET

May 23, 2013 2:00pm ET (ZS will not be on call)

June 13, 2013 2:00pm ET

MM and ML to potentially talk about National Genetic Resource Advisory Council (NGRAC) FACA Board and ERS (Economic Research Service) survey of seed data

June 27, 2013 2:00pm ET

July 11, 2013 2:00pm ET

GMO vaccines update (ZS)

July 25, 2013 2:00pm ET

August 15, 2013 2:00pm ET

August 29, 2013 2:00pm ET

September 12, 2013 2:00pm ET

September 26, 2013 2:00pm ET

October 10, 2013 2:00pm ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	
Discuss workplans on ES call	
NOP provides written comments on workplans to NOSB	
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 21-24, 2013

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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, May 23, 2013, 2:00pm ET**

Attending: Jennifer Taylor (JT) (Chairperson), Jay Feldman (JFe), Colehour Bondera (CoB), Francis Thicke (FT), Calvin Walker (CW), Mac Stone (MS), Jean Richardson (JR)

Guests: Holli Cederholm, General Manager, Organic Seed Growers & Trade Assn. and Bryce Stephens

Absent: Zea Sonnabend (ZS) (Vice-Chairperson),

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

Work Plan

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO is lead. Proposal Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO is lead. Proposal Joint w/Crops.		Fall 2013
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Review/approve notes from May 9, 2013
- New Issues for agenda
- Review Seed Purity Document, comments, concerns/Colehour and Jay
- Guest speakers: Holli Cederholm, General Manager, Organic Seed Growers & Trade Assn. and Bryce Stephens that will address several issues including Seed, Seed Purity Document, etc.
- Discussions
- Research Priorities List of topics/concerns
- Meeting Adjourned

Discussion:

- Notes from the May 9, 2013 call approved with no changes.
- New Issues for agenda – update from Mark Lipson about USDA plant breeding working group. Group is scheduling a public listening session for August 15 and Mark will forward any information as he gets it. ML also updated the group about the seed survey by ERS, which was a recommendation from the AC21. Will also forward any additional info.
- Review Seed Purity Document, comments, concerns (CBo, JFe)
 - The Subcommittee undertook a survey of the scientific peer-reviewed literature on seed purity, and noted that it's a difficult topic that they may need help with.
 - Guest speakers: Holli Cederholm, General Manager, Organic Seed Growers & Trade Assn. and Bryce Stephens who will address several issues including Seed, Seed Purity Document, etc. Mr. Stephens is certified organic and has a long history in the organic arena. He raises wheat, clover, alfalfa, and livestock, and has chosen to not grow corn or soybeans because of contamination worries. He discussed the history of his farm and problems they've encountered with GMOs along the way, including the fact that he grew a test plot with organic corn seed, testing before and after, and found contamination. A member asked about Puramaize and indicated that he would be growing it as an experiment and testing it for contamination. Ms. Cederholm, who works for Organic Seed Growers & Trade Association (OSGTA), is working on a manual for seed companies and growers about avoiding GMO contamination and protocols, and noted that they are cognizant of the burden to small farmers when writing protocols. OSGTA supports requiring biotech companies to bear the responsibility for the costs associated with testing for contamination. JFe asked what the guests thought the role for the NOSB should be. Both guests thought that the issue should be a priority for the NOSB, and if given the opportunity, would tell Secretary Vilsack to protect organic, regardless of the fact that OFPA and the regulations were written before there were such things as GMOs. Ms. Cedarholm commended the Board for looking at this topic and encouraged them to not allow any tolerances, adding that the standards for seed integrity need to be strict and the allowance needs to be as low as possibly detectable. Both stressed a need to continue to work with growers, and to keep in mind that variables due to scale, region, etc, need to be taken into account. The group discussed the current knowledge about contamination levels, and that contamination is increasing geometrically, which is based on documentation from geneticists. The Union of Concerned Scientists (UCS) published a study 10 years ago indicating already high contamination levels. ML asked what other crops besides corn and canola presented challenges for OSGTA members. Other problematic crops include sugar beets, soy, alfalfa, papaya, squash and cotton, although some of these crops don't cross pollinate so aren't necessarily an issue. The Chair asked if the guests would be willing to participate on a future call if the group had follow up questions.
- The meeting was adjourned following the discussion on Seed Purity.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

May 23, 2013 2:00pm ET (ZS will not be on call)

June 13, 2013 2:00pm ET

MB and ML to potentially talk about National Genetic Resource Advisory Council (NGRAC) FACA Board and ERS (Economic Research Service) survey of seed data

June 27, 2013 2:00pm ET

July 11, 2013 2:00pm ET

GMO vaccines update (ZS)

July 25, 2013 2:00pm ET

August 15, 2013 2:00pm ET

August 29, 2013 2:00pm ET

September 12, 2013 2:00pm ET

September 26, 2013 2:00pm ET

October 10, 2013 2:00pm ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
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NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	
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NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 21-24, 2013

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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, June 13, 2013, 2:00pm ET**

Attending: Jennifer Taylor (JT) (Chairperson), Colehour Bondera (CoB), Francis Thicke (FT), Zea Sonnabend (ZS) (Vice-Chairperson)

Absent: Jean Richardson (JR), Calvin Walker (CW), Mac Stone (MS), Jay Feldman (JFe)

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

Work Plan

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO is lead. Proposal Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO is lead. Proposal Joint w/Crops.		Fall 2013
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Review/approve notes from May 23, 2013
- Discuss Study Conducted on Transgene Flow (JFe)
- Meeting Adjourned

Discussion:

- Notes from the May 23, 2013 call approved with no changes.
- Members had a follow up discussion about the two guests that were on the last call, who spoke about seed purity.

- The group briefly discussed Study on Transgene Flow, but deferred further conversation to the next call until JFe could participate.
- ML updated the group about various USDA entities who are looking at issues around seed purity. The survey of seed companies and unintended gene presence in the seed supply, for which the Economic Research Service (ERS) has done preliminary work, was a recommendation from the AC21 asking that the USDA collect quantitative data about seed contamination. The charge for the National Genetic Resource Advisory Council (NGRAC) FACA Board is to produce a recommendation regarding USDA germplasm and breeding lines to insure diversity and high quality seed for all users. There is also an internal USDA plant breeding working group as well, who are preparing to hold a stakeholder listening session regarding the USDA's objectives for plant breeding, possibly in August. A member asked what agencies are involved in the WG. NOP noted that it included ARS, NIFA, ERS, NAS, and
- The chair asked if the NOSB/Committee has ever conducted a survey. There is no indication that a survey had been done.
- The Chair asked if the NOSB had ever received a response about the GM letter that was sent to the secretary in May 2012. There was no specific response as there was none requested, but the NOSB did request that the USDA take action, which was incorporated into the charge of the AC21.
- Meeting Adjourned

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

June 13, 2013 2:00pm ET

MB and ML to potentially talk about National Genetic Resource Advisory Council (NGRAC) FACA Board and ERS (Economic Research Service) survey of seed data

June 27, 2013 2:00pm ET

July 11, 2013 2:00pm ET

GMO vaccines update (ZS)

July 25, 2013 2:00pm ET

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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, June 27, 2013, 2:00pm ET**

Attending: Jennifer Taylor (JT) (Chairperson), Colehour Bondera (CoB), Francis Thicke (FT), Zea Sonnabend (ZS) (Vice-Chairperson), Jean Richardson (JR), Calvin Walker (CW), Jay Feldman (JFe)
Guests: Jim Gerritsen, farmer, President Organic Seed Growers and Trade Association, Holli Cederholm, general manager OSGATA, Bryce Stephens, farmer
Absent: Melissa Bailey (MB) (NOP staff), Mark Lipson (ML) (USDA-OSEC), Mac Stone (MS)
NOP Staff: Michelle Arsenault (MA)

Work Plan

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO ad hoc is lead. Report/update Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO ad hoc is lead. Proposal Joint w/Crops.		Fall 2013
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Review/approve notes from June 13, 2013
- New Issues
- Seed Purity Document (CBo, JFe)
- Guest speakers, Jim Gerritsen, farmer, President Organic Seed Growers and Trade Association, Holli Cederholm, general manager OSGATA, and Bryce Stephens, farmer, will communicate several issues/concerns including Seed and contamination by GMO agricultural practices:
- Discussion
- Meeting Adjourned

Discussion:

- Notes from the June 13, 2013 call were approved with no changes.
- Members discussed the Transgene flow document that was circulated, and how to proceed. Key words are identified for each of the 5 studies and the NOP will use these to conduct a literature search for the NOSB. A member noted that the data demonstrate that transgene flow occurs and assembling that data in one place will help to inform future decisions. Another member applauded the effort, and noted that the document was a great start. Also noted, was that some of the key words might be too broad, so perhaps more specific key words or doing a citation search would yield better results. For example transgene is broad while mitigation gene is much more specific and would narrow the results.
- Seed Purity Document (CBo, JFe) – The group discussed the goal and next steps for this document and decided to put forth a report or update instead of a proposal, for the fall 2013 NOSB meeting. Included in this update, will be a map of the path forward.
- CBO introduced the guests who, on the last call, shared extensive info and generated some more questions. Jim Gerritsen summarized the current OSGATA lawsuit against Monsanto and seed contamination. Members had several questions about the specifics of the case and discussed the next steps. A member noted that the NOSB is in a unique position to work on this, and that they are in agreement with OSGATA, however, it's complicated by several factors like the language in the regulations, and are considering with how best to proceed. Members discussed OSGATA's GMO avoidance protocol standard, which they noted is basic and doesn't have a very high degree of detail. In comparison, the NOSBs seed purity document (April 2013) included a detection level of 0% in 3000 kernels, and was more specific, and a member noted that a general statement like OSGATA's might encourage people to simply choose not to test. The same member asked if it was a good idea to include specific detection levels or not. OSGATAs scale defines a 0% allowance in 10,000 kernels for small, med, or large farmers. Additionally, OSGATA noted that they support PCR testing over the other methods, which they feel are less rigorous. The group discussed testing costs and who should bear the burden of those costs. All were in overwhelming agreement that the parties responsible for the contamination (i.e. the GE technology) should be responsible. Although not placing the financial burden on the farmers is the mutual goal, relaying this to the USDA and having it implemented seem to be a hindrance. A member added that it was important to speak with clarity and redundancy about the cost to the organic market and community from GMOs. The NOSB feels that the letter that they sent to Secretary Vilsack laid the ground work, but moving forward they needed to put forth a proposal that the department will then have to act on. Members also discussed making their arguments more specific and focused, including such things as the issue of testing without shifting the cost burden to the farmer, setting allowance levels, recurrence intervals for testing, and an enforcement mechanism. Members thanked the guests and asked if they would be willing to participate at a later date, as they continue to work on this document.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

June 27, 2013 2:00pm ET

July 11, 2013 2:00pm ET

GMO vaccines update (ZS)

July 25, 2013 2:00pm ET

August 15, 2013 2:00pm ET

August 29, 2013 2:00pm ET

September 12, 2013 2:00pm ET

September 26, 2013 2:00pm ET

October 10, 2013 2:00pm ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	
Discuss workplans on ES call	
NOP provides written comments on workplans to NOSB	
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 21-24, 2013

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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, July 11, 2013, 2:00pm ET**

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

Absent: Francis Thicke (FT), Jean Richardson (JR)

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

Work Plan

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO ad hoc is lead. Report/update Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO ad hoc is lead. Proposal Joint w/Crops.		Spring 2014
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Review/approve notes from June 27, 2013
- New Issues?
- Discuss comments from last meetings expert speakers
- Preparation for fall meeting and public comments
- Review of studies conducted on Transgene Flow document (JFe)
- Seed Purity document (CBo, JFe)
- GMO Vaccines update (JR)
- Action points for ground work
- Discussions

- Admin updates- bios, etc. (MA)
- Adjourn

Discussion:

- June 27, 2013 notes were approved with no changes.
- New Issues – no new issues were identified
- Discuss comments from the expert speakers who participated on the last call. A member felt that the views of the experts from the Seed Alliance and others are not being heard at the USDA at large and emphasized how important it was that the NOSB be a vehicle by which they can relay that information directly and frequently. MB offered to forward the literature to various entities within the USDA that the experts provided. The group discussed whether or not they should combine the documents in the Seed Purity document or keep them separate, but either way would like to solicit input from the public.
- Review of studies conducted on Transgene Flow document (JFe). The USDA library is running a search on keywords that came from the gene flow document and the group is waiting for results. The library anticipates finishing the literature search by ~July 23. Members discussed options for moving ahead and whether or not they should incorporate the research information or put forth an informational document indicating what the Subcommittee/NOSBs intentions are. They also discussed soliciting information about the state of the research. MB suggested possibly putting it forth as a gap analysis, and asking for comments about the areas that are lacking.
- Seed Purity document (CBo, JFe) – Since this document has already been submitted twice for comment the members discussed the next steps. The consensus among the community is that they want seed purity standards but do not want the farmers to bear the burden of testing costs. The group feels they should move ahead with a standard and be declarative about who will not bear the burden of costs in an effort to make very clear the NOSB's position. The goal is to maintain visibility with regard to this issue, and get it to the community so they can begin discussing the details. The group discussed various aspects to include in the document, such as exemptions for organic growers. ZS will share key points she compiled from the public comments with JFe and CBo, and asked that they emphasize the majority opinion. The members also discussed the inclusion of a mechanism for how fees would be assessed and collected. It was noted that the group didn't necessarily have to identify a specific mechanism but could just include language about who will be responsible and the mechanism could be determined later. The AC21 discussed a crop insurance funding mechanism but in the context of organic farmers having to pay the cost. The group had a general discussion about how best to make this recommendation and what authority the NOP has for implementation.
- GMO Vaccines update (JR) - There was no update on GMO vaccines because the Vaccines Made with Excluded Methods Working Group (VMWEM) has not had any conference calls in the recent past. The working group has a call scheduled for, July 18, and MB offered to send an update. Members discussed an outstanding question about what actually constitutes a GM vaccine. They felt this was a fundamental question that needs to be addressed and clarified.
- Action points for ground work - The Chair asked that the members think about and identify ways to work with the community and/or other agencies to bring into focus the GMO issue or other issues that they feel need to be addressed. ZS offered the following as a focus: prevention strategies for keeping GMOs out of organic, which is supported by the public. JFe noted a paper about GMO best practices, prevention, etc.

- ML informed the group about the August 15 listening session on plant breeding. He circulated a document with the specific information and let the group know that the comment period is open until August 22 and they are seeking answers and input on very specific questions. ML suggested that the reference documents the Subcommittee is working on could be offered for the record with some context relevant to the goals of the listening session. And also noted that this could be a possible topic for next call.
- The meeting was adjourned

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

- July 11, 2013 2:00pm ET
GMO vaccines update (JR)
- July 25, 2013 2:00pm ET
- August 15, 2013 2:00pm ET
- August 29, 2013 2:00pm ET
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Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 22-24, 2013

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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, July 25, 2013, 2:00pm ET**

Attending: Jennifer Taylor (JT) (Chairperson), Zea Sonnabend (ZS) (Vice-Chairperson), Colehour Bondera (CoB), Calvin Walker (CW)

Absent: Melissa Bailey (MB) (NOP staff), Francis Thicke (FT), Jay Feldman (JFe), Mac Stone (MS), Jean Richardson (JR)

Guest Speaker: Isaura Andaluz, (New Mexican grower, beekeeper and economic development consultant of Cuatro Puertas

NOP Staff: Michelle Arsenault (MA), Mark Lipson (ML) (USDA-OSEC)

Work Plan

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO ad hoc is lead. Report/update Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO ad hoc is lead. Proposal Joint w/Crops.		Spring 2014
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Review/approve notes from July 11, 2013
- New Issues
- Guest speaker

Discussion:

- Approve of notes from July 11, 2013 was deferred to the next call
- There were no new issues
- Guest speaker Isaura Andaluz. Isaura is a native New Mexican, a grower, beekeeper and economic development consultant in the agricultural sector, and works with a non-profit group called Cuatro Puertas (CP) that works to connect urban economies with rural agricultural economies by building on local assets and biodiversity. CP was established to rescue and reintroduce native, heirloom and forgotten crops, and is New Mexico's largest seed bank. Isaura works with Native American and Hispanic small farmers about contamination issues from GMO agricultural practices and strategies, and relayed some of those issues to the Subcommittee. She noted that some farmers don't grow corn anymore and instead are growing things like potatoes that are non-GMO. She recently sat on the AC21 Committee that looked at coexistence and contamination issues from genetically engineered seeds and feels it is imperative that we find solutions to help organic farmers. Several members asked questions of the guest, including suggestions about what the NOSB can do, and how to maintain a balance between keeping the seeds pure while still promoting biodiversity. IS felt that maintaining clean seeds will promote biodiversity and they were not in opposition. She also spoke about testing the current seed supply as a starting point for building a seed bank with clean seed lines. Isaura welcomed follow up questions via email. ML commented on various aspects of the seed purity discussion, and will follow up with the members regarding comments that the guest made about crop insurance, as he was not familiar with that.
- Seed Purity Document update (CBo, JFe) – CBo indicated that they hadn't had a chance to coordinate schedules to work on a document yet but should have something ready for the August 8 call
- Transgene Flow Document. Discussion was deferred to August 8.
- Farmer's Choice (JT). The Chair sought input from the group about this document and indicated that the goal would be to produce a letter to Secretary Vilsack to keep the issue at the forefront. A member said that the draft document that was circulated didn't contain any specific action so it was unclear as to how to proceed. The Chair noted that she will add action items to the document and recirculate it. A member felt that any potential actions items were already on the workplan and didn't feel that this was something that needed to be on the workplan. JT asked others to contribute ideas for the document and CW volunteered to help write it. The group will discuss the next draft on the August 8 call.
- August 15 listening session on plant breeding (ML). In addition to Isaura, who was the guest speaker on the call today, there are a number of people from the Organic seed community signed up to speak during the listening session. Written comments will be accepted until August 22. The ultimate goal of the listening session is the creation and distribution of a white paper that will include the goals of the USDA plant breeding efforts and options for going forward. ML also noted that the plant breeding working group is planning a call soon.
- ZS suggested two speakers for future calls and will provide contact information to the chair. She noted that in the interest of time, it would be better to schedule these guests after the proposal deadline of August 27.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

July 25, 2013 2:00pm ET

August 8, 2013 2:00pm ET

Seed Purity Document (CBo, JFe) - discussion

Transgene Flow Document - discussion

Farmer's Choice (JT) - discussion

August 22, 2013 2:00pm ET

Seed Purity Document (CBo, JFe) - vote

September 12, 2013 2:00pm ET

September 26, 2013 2:00pm ET

October 10, 2013 2:00pm ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 22-24, 2013

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, August 8, 2013, 2:00pm ET**

Attending: Zea Sonnabend (ZS) (Vice-Chairperson), Colehour Bondera (CoB), Francis Thicke (FT), Jay Feldman (JFe)

Absent: Jennifer Taylor (JT) (Chairperson), Mac Stone (MS), Calvin Walker (CW), Jean Richardson (JR)

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

Work Plan

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO ad hoc is lead. Proposal Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO ad hoc is lead. Proposal Joint w/Crops.		Spring 2014
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Review/approve notes from July 11 and 25, 2013
- Transgene Flow Document (JFe). NOP library search results.
- Seed Purity Document Update (CBo, JFe)
- Superfund-like Protection from Gene Drift to Organic (JFe)
- Identify research priorities for GMO Ad-hoc Subcommittee (All)
- Additional issues
- Meeting Adjourned

Discussion:

- Notes from July 11 and 25, 2013 were approved with minor changes to a date in the July 11 notes.

- GMO Vaccines update. MB did not participate on the Vaccines Made with Excluded Methods Working Group (VMWEM) call but relayed some information that she had. The VMWEM summarized the public comment received during the last comment period and discussed the draft document they are working on. JR could potentially give a more comprehensive update on next call.
- Transgene Flow Document (JFe) – The USDA library is almost finished with the results of the search, which resulted in a very large data set. It will be sent to the Subcommittee by early next week.
- Seed Purity Document Update (CBo, JFe) – The group discussed the idea of including in the Seed Purity proposal a component to address protection from gene drift to organic. Although more discussion is needed about this approach, several members were supportive and would like to explore the idea. JFe noted that it is already written as a proposal, and although it's broader than just seed purity, it could be included in the Seed Purity document for the fall meeting, Members discussed some of the language in the draft document, including how such a mechanism would be implemented and whether or not it was feasible to complete this in time for the proposal deadline. MB and ML commented that it would take Congressional action to authorize a taxation scheme for seed; NOP would not be able to address an NOSB recommendation on this. They would like to move it forward in an effort to collect public comment. JFe will work on the document and the group will discuss it further on a call on August 15th, (which was added to the call schedule) and vote on the August 22 call.
- Identify research priorities for GMO Ad-hoc Subcommittee (All) –One member put forth the idea of looking at GMOs in compost, and the group was supportive of this.
- Additional issues – none were discussed
- Meeting Adjourned

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

- August 8, 2013 2:00pm ET
 - Seed Purity Document (CBo, JFe) - discussion
 - Transgene Flow Document - discussion
 - Farmer's Choice (JT) - discussion
- August 15, 2013 2:00pm ET (additional call)
 - Discuss Seed Purity Document (CBo, JFe)
- August 22, 2013 2:00pm ET
 - Seed Purity Document (CBo, JFe) - vote
- September 12, 2013 2:00pm ET
- September 26, 2013 2:00pm ET
- October 10, 2013 2:00pm ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013

NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 22-24, 2013

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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, August 15, 2013, 2:00pm ET**

Attending: Zea Sonnabend (ZS) (Vice-Chairperson), Colehour Bondera (CoB), Francis Thicke (FT), Jay Feldman (JFe), Jennifer Taylor (JT) (Chairperson),

Absent: Jean Richardson (JR), Mac Stone (MS), Calvin Walker (CW)

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

Work Plan

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO ad hoc is lead. Proposal Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO ad hoc is lead. Proposal Joint w/Crops.		Spring 2014
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Review/approve notes from August 8, 2013
- Seed Purity Proposal, next steps
- Meeting Adjourned

Discussion:

- Notes from August 8, 2013 approved without changes
- Seed Purity Proposal - The members have been revising and editing the document since the last call and discussed the various changes. The section regarding compensation was intentionally left general in an effort to collect public comment. Members discussed how to cite public comments, and decided that the organization and the date of the pertinent NOSB meeting would be adequate. MA will add the hyperlink to the AC21 doc and the public comment on

regs.gov. ZS captured the changes and will incorporate them and recirculate the document before the next call so the group can vote on it.

- Research Priorities. The MS Subcommittee will compile the Research Priorities and has two from the GMO ad hoc Subcommittee thus far. Members discussed additional priorities or topics that may be viable. A member suggested research on GMO farming strategies that could reduce or eliminate impact on neighboring farms or environments.
- The meeting was adjourned

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

August 8, 2013 2:00pm ET

Seed Purity Document (CBo, JFe) - discussion

Transgene Flow Document - discussion

Farmer’s Choice (JT) - discussion

August 15, 2013 2:00pm ET (additional call)

Discuss Seed Purity Document (CBo, JFe)

August 22, 2013 2:00pm ET

Seed Purity Document (CBo, JFe) - vote

September 12, 2013 2:00pm ET

September 26, 2013 2:00pm ET

October 10, 2013 2:00pm ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 22-24, 2013

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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, August 22, 2013, 2:00pm ET**

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

Absent: Jean Richardson (JR)

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

Work Plan

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO ad hoc is lead. Proposal Joint w/Crops.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO ad hoc is lead. Proposal Joint w/Crops.		Spring 2014
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Review/approve notes from August 15, 2013
- Seed Purity Proposal (ZS)
- Transgene Flow Document (JFe)
- Superfund-like Protection from Gene Drift to Organic(JFe)
- Research priorities (All)
- Additional issues
- Meeting Adjourned

Discussion:

- Notes from August 15, 2013 approved with no changes

- Seed Purity Proposal - The group discussed the email from the NOP indicating that portions of the draft seed purity document pertaining to compensation aspects cannot be implemented by the USDA, and the NOP will not be able to post this proposal as currently drafted. MB and ML discussed various options, such as withdrawing the proposal or removing parts of it. The group emphasized the need for the Board to state their views on the public record, as well as those of the entire organic community, and to exercise their mandate of communicating those views to the Secretary of Agriculture. Members discussed how to proceed, including replacing the recommendation with a resolution. A resolution, much like the one that was incorporated into the Streptomycin recommendations, would represent the will of the Board without binding the NOP to implement recommendations they cannot. In place of language indicating who should bear the burden for testing and contamination, a member suggested alternate language; "It is the position of the NOSB that the costs of seed testing and the costs resulting from detected contamination of the seed supply should not be borne by producers of organic seeds." ML feels that this is a symbolic statement but is not constructive. He urged the group to decouple this part of the document from the actual seed purity standard part. The members also discussed reformatting the document as a discussion document instead of a proposal and including questions for the public asking how to attain the goal of determining who should bear the cost burden for contamination and testing. The group discussed other strategies and asked that the NOP provide more specific feedback so the document will be approved for posting. MB noted that the NOP would like to see a more tailored report as opposed to a discussion document or proposal for the NOSB fall meeting outlining the challenges and setting the seed purity standard without proposing a solution.
- Transgene Flow Document (JFe) – One member had trouble accessing the site and MA let the NOP know that they may need assistance gaining access. The USDA librarian offered to pare down the list of results as it was quite large.
- The group added an additional call for Monday, August 26 to present the revised document and to potentially vote.
- The meeting was adjourned due to time constraints, and the remainder of the agenda items were not addressed.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

August 15, 2013 2:00pm ET (additional call)
Discuss Seed Purity Document (CBo, JFe)

August 22, 2013 2:00pm ET
Seed Purity Document (CBo, JFe) - vote

August 26, 2013 1:00 ET - Additional call

September 12, 2013 2:00pm ET
Discuss workplan

September 26, 2013 2:00pm ET

October 10, 2013 2:00pm ET

Fall 2013 Milestones	Target date
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NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 22-24, 2013

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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, August 26, 2013, 1:00pm ET**

Attending: Jennifer Taylor (JT) (Chairperson), Zea Sonnabend (ZS) (Vice-Chairperson), Colehour Bondera (CoB), Francis Thicke (FT), Jay Feldman (JFe), Mac Stone (MS)

Absent: Calvin Walker (CW), Jean Richardson (JR)

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

Work Plan

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO ad hoc is lead. Update.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO ad hoc is lead. Proposal Joint w/Crops.		Spring 2014
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Discuss and vote on Seed Purity Proposal (ZS)
- Meeting Adjourned

Discussion:

- Seed Purity. The NOP feels strongly that the draft document needs more work and as is, is not effective or germane. The NOP is also not able to be supportive of the ideas as presented, as USDA does not have authority to implement some of the suggestions. A member asked if the NOP would feel more comfortable if the document didn't contain any language about cost burden for polluters. MB added that it would be more helpful for the NOP to have a longer lead time to work on the document with the group, and urged the Subcommittee to delay this document to the spring 2014 meeting. NOP will not be able to post this proposal as currently drafted. This would allow all involved to work collaboratively on the document to make it as

robust as possible. The Board Chair added that he would like to make this document a priority on the workplan immediately after the fall 2013 meeting so it does not drop off and the group does not lose momentum. ML agreed and committed to working with members on it. Members also discussed having a face-to-face discussion at the fall meeting. The group chose to maintain time on the fall 2013 agenda for a discussion about this document, which they will now consider an update. The workplan table above was changed to reflect this.

- ML summarized a recent town hall meeting between various seed organizations and Secretary Vilsack. As a follow up to this listening session, the Secretary has assigned groups within the USDA to provide reports on current wheat field trials, which will be combined into a response from the USDA to the community. A member suggested that the NOSB write a letter to the Secretary indicating information the Board has collected from the community. The Chair emphasized the Boards desire and interest in providing advice to the Secretary, as they are mandated to do.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

- August 22, 2013 2:00pm ET
Seed Purity Document (CBo, JFe) - vote
- August 26, 2013 1:00pm ET
- September 12, 2013 2:00pm ET
Discuss workplan
- September 26, 2013 2:00pm ET
- October 10, 2013 2:00pm ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 22-24, 2013

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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, September 12, 2013, 2:00pm ET**

Attending: Jennifer Taylor (JT) (Chairperson), Colehour Bondera (CoB), Francis Thicke (FT), Mac Stone (MS), Calvin Walker (CW)

Absent: Jean Richardson (JR), Zea Sonnabend (ZS) (Vice-Chairperson), Jay Feldman (JFe)

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

Work Plan

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO ad hoc is lead. Joint w/Crops. Update.		Fall 2013
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO ad hoc is lead. Discussion Doc Joint w/Crops.		Spring 2014
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Approve notes from August 22 and August 26
- Overview of issues
- Seed purity document, next steps,
- Transgene flow document, next steps
- Work Plans
- Fall Meeting presentations, public comments
- Discussion Updates/Michelle
- Adjourned

Discussion:

- Notes from August 22 and August 26 were both approved with minor changes.
- Seed purity document – MB and ML will talk with ZS about strategies for some changes in the document. The NOP asked that the GMO ad hoc Subcommittee continue to talk about the Seed Purity document on the conference calls, and let the NOP know what content will be covered at the fall meeting.
- Terminology for Excluded Methods – The Subcommittee talked about the need to discuss with ZS and the Livestock Subcommittee how/whether this will intersect with the work that the GM Vaccine Group will be passing to the Livestock Subcommittee. We will discuss on next call with ZS and JR.
- Transgene flow document, next steps. This document is being worked on by JFe and the group will discuss it during the next call. MB stated that the subcommittee should present what the document/workplan item would address at the Executive Subcommittee call. Currently, the document is a scoping of the available research on this topic and NOP provided additional citations for subcommittee to look at.
- Work Plans (WP). The group discussed keeping the “Terminology for Excluded Methods” on the workplan for spring 2014. The Chair suggested adding an item, potentially a report, about GMOs and their effects on the organic community. Another member felt that this could overlap with the “Farmers Choice” document that is already on the workplan. ML asked that the group write a short summary so the NOP can review it to determine the scope and boundaries of this document. The group discussed the criteria that need to be addressed in such a summary document which is unclear and is something that the NOP is going to provide to the Board. There are several questions that are basic and should be addressed when proposing new workplan items: What problem is the document trying to solve; what’s the goal; and can the NOP implement the recommendation? The Subcommittee may add two items to the WP: transgene flow and the paper/report on an update about GMOs. The NOP suggested not adding new items at this time and instead focusing on the items they currently have on the workplan, as some of the projects are very large and ongoing.
- Fall Meeting presentations– members did not discuss how they will present at the fall meeting but will do so on the next call.
- MA updated the group about the public comments received so far, several of which pertained to GMOs.
- The meeting was adjourned.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

September 12, 2013 2:00pm ET

Discuss workplan

September 26, 2013 2:00pm ET

October 10, 2013 2:00pm ET

October 10, 2013 2:00pm ET

November 14, 2013 2:00 ET

November 28, 2013 2:00 ET
December 12, 2013 2:00 ET
December 28, 2013 2:00 ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
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Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 22-24, 2013

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**National Organic Standards Board (NOSB)
GMO ad hoc Subcommittee Meeting Notes
Thursday, November 14, 2013, 2:00pm ET**

Attending: Jennifer Taylor (JT) (Chairperson), Zea Sonnabend (ZS) (Vice-Chairperson), Colehour Bondera (CoB), Mac Stone (MS), Jean Richardson (JR), Jay Feldman (JFe), Francis Thicke (FT)

Absent: Calvin Walker (CW)

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

Work Plan (Will be replaced with updated version after November Executive Call)

Project	Contact	Notes*	Vote	Meeting
Seed Purity	ZS/JFe/CBo	GMO ad hoc is lead. Joint w/Crops. Update.		Fall 2013 Meeting Cancelled
Terminology for Excluded Methods (formerly Plant Breeding)	ZS	GMO ad hoc is lead. Discussion Doc Joint w/Crops.		Spring 2014
Tracing GMOs in Input/Ingredient Chain		Discussion doc		TBD
Prevention Strategy Guidance for Excluded Methods in Crops and Handling	JFe, CBo	Discussion doc		Beyond 2013
Farmers Choice	JT	Will discuss further in Subcommittee once JT writes a summary document		TBD

Agenda:

- Approve notes from September 12, 2013
- ML update about GE open docket
- Discuss written comments and impact
- Examine work plan topics
- Update on public docket system and progress (MA)
- Adjourned

Discussion:

- Notes from September 12, 2013 approved with no changes. A member asked about the use of names vs. initials. Members are usually referred to by name when it pertains to an action item; otherwise they are referred to generically.
- ML sent an email to the Subcommittee containing links to documents regarding Coexistence among GE and non-GE producers and noted that the comment period closes January 3. The blogpost announcing the publication is here: <http://blogs.usda.gov/2013/11/06/agricultural-coexistence-fostering-collaboration-and-communication/> and the FR Notice and electronic docket for comments are here: <http://www.regulations.gov/#!documentDetail;D=APHIS-2013-0047-0001>. MB will look into the FACA policies about Subcommittees submitting comments*. The USDA official talking points, included below, were also provided. Several members asked questions or provided feedback based on the talking points that ML shared. ML encouraged people to submit comments, as hearing from the different segments of the community is critical going forward.

*According to the General Services Administration FACA Secretariat, Subcommittees are not allowed to submit comments on behalf of the Board or Subcommittee, but individual Board members can.

USDA Talking Points regarding the November 4, 2013 Federal Register Notice concerning “agricultural coexistence”:

USDA supports all forms of agriculture—GE, conventional, and organic—to help meet the agricultural challenges and consumer needs of the 21st century.

- *USDA supports all forms of agriculture—genetically engineered (GE), conventional, and organic. We need all three to meet our collective needs for food security, energy production, carbon offsets, and the economic sustainability of rural communities.*
- *At the end of the day, we want to promote as diverse an agricultural economy as possible, where farmers can engage in whatever type of agriculture they’re interested in.*
- *We are striving to forge a new paradigm of coexistence supported by strengthened cooperation and science-based stewardship practices.*
- *In January, 2011, Secretary Vilsack announced the reactivation of the AC21, a Committee designed to examine the long-term impacts of biotechnology on the U.S. food and agriculture system and provide guidance to USDA on pressing individual issues related to the application of biotechnology in agriculture.*
- *The AC21 is a diverse group whose members represent a wide range of production systems, technologies, and fields of study. The committee worked diligently to identify areas of common ground within a complex set of issues.*
- *In November 2012, the Committee gave to the Secretary a set of concrete recommendations, with 22 out of the 23 members in agreement.*
- *At this year’s AgOutlook Forum, the Secretary committed to acting on their hard work by taking steps now into the next year to implement many of their recommendations.*

- *The Secretary committed to communicating openly with the public and stakeholders and asking for their input through a Federal Register notice, and hosting a stakeholder workshop.*
- *The Federal Register notice we're announcing today is the first step to meeting this commitment and keeping the dialogue going regarding coexistence. We're asking all stakeholders with a vested interest in coexistence to provide information and insights about the ways in which USDA can foster communication and collaboration to strengthen coexistence.*
- *We want to hear more about the collaboration that's already occurring in rural America, and what, if anything, USDA can do to help make collaboration and coexistence work for everyone involved. We are looking to learn more about local voluntary solutions to coexistence challenges; examples of effective coexistence practices; and how these kinds of information and resources could be used in the development of voluntary joint coexistence plans that could be used to support coexistence and identity-preserved production.*
- *We also want to better understand stakeholders' needs and challenges when it comes to communicating and collaborating about coexistence. As the complexity and diversity of U.S. agriculture continues to grow, so does the importance of discussing and actively managing issues that affect agricultural coexistence—things like seed purity, gene flow, post-harvest mixing, identity testing and market requirements.*
- *We are looking to find out what's working well – or not – in these areas and what communication practices and tools currently exist. Where gaps exist, we seek to learn how USDA, working in partnership with others, might address them to support coexistence and American agriculture.*
- *The Federal Register notice also asks for stakeholders to identify needs they may have regarding informational resources and other related tools that would help them achieve their production and marketing goals while also supporting coexistence.*
- *For instance, we are asking for thoughts on what could comprise toolkits that producers would find useful and informative. We see these kits providing resources that encourage communication, planning, and crop-specific practices to achieve coexistence. They could help start dialogue – and keep it going – regarding coexistence.*
- *The Notice includes several questions regarding possible toolkits and other issues related to coexistence, including:*
 - *What tools and educational services or information that might comprise a toolkit are available? What would be helpful to you in a toolkit – written materials, videos, a list of information sources, training programs?*
 - *Could USDA help farmers to better understand the contracts they enter into and their commitments with respect to coexistence?*
 - *Would pinning maps and other geographic information be helpful to you in understanding the location of crops that are planted and grown using different*

types of agricultural systems in your vicinity? How can USDA support and encourage these locally based and voluntary efforts?

- *Would decision support systems – such as a computer program that considers different information and helps farmers achieve coexistence goals – be useful to you? If so, what data would be needed for the system to be effective given your specific situation?*
- *What could a joint coexistence plan, developed between neighboring farmers, look like? What kind of information does it include – cropping plans, temporal and physical separation distances between some crops, agreed-upon harvesting techniques? What else could it contain that would support identity-preserved production?*
- *Coexistence is one of the most important challenges facing U.S. agriculture today. We want to hear from as many commenters as possible. Once the comment period closes, we will very carefully review all of the information and feedback that we receive. We will use the information to plan an open workshop meeting in the near future to spend more time discussing and understanding the feedback we receive and what the next steps might be.*
- A member noted that Animal and Plant Health Inspection Service (APHIS) has a comment period open regarding a new non-browning apple. The comment period is open until December 9, and ZS offered to provide information about how and where to comment. MS asked about sending Organic Insider Notices about the two comment periods and ML concurred that this was a good idea. ML and MB will follow up.
- Fall 2013 written comments: members indicated that the comments received didn't warrant revision of the fall 2013 documents. A member noted that a summary of the comments on seed purity was already provided in a draft version of the proposal.
- Work plan topics. Seed Purity and Terminology for Excluded Methods docs are still on the workplan. The chair asked if the members had an interest in writing briefing papers on any of the items that the NOP did not include on the workplan: (Tracing GMOs in Input/Ingredient Chain, Prevention Strategy Guidance for Excluded Methods in Crops and Handling, and Farmers Choice) to move them forward. ZS offered to write a briefing paper on Tracing GMOs in Input/Ingredient Chain but not immediately, as she has two other documents in progress. This workplan item was originally added as a long term project but the NOP envisions the workplan table as a list of items currently being worked on, and not as a place holder. A member noted that writing a briefing paper without feedback from the NOP about what they think should be in the briefing paper is a catch-22, and would like some clarification from the program. A member asked for clarification about the Seed Purity document, and what needed to be done to move it forward. ZS has version control of this document and will be meeting with ML to discuss the path forward. The NOP agreed that clarity is important, and noted that the criteria they used to determine which proposals would go forth was sent to the Board when the workplan was sent (October 18, 2013). The group discussed the bulleted list. Some felt that more specificity of the criteria was needed and some felt that what was provided was not considered criteria. NOP suggested that it would be more appropriate to have discussion about workplan criteria on a Policy Development call. Members discussed the role of NOSB in advising the Secretary versus the role of NOP to implement their recommendations. ZS will rewrite the Prevention Strategies document and submit it.

- The meeting was adjourned
- Additional Items added by MA post-conference call:
 - In response to a question by the GMO ad hoc Chair about the public docket system and progress – The NOP is still weighing options at this time. A near-term solution of posting incoming communication on the NOP website was identified but as we considered the details, it became clear that the maintenance and organization would quickly become unmanageable. We are now seeking longer-term solution so we don't "platform switch" mid-stream, while also finding a solution and governance approach that won't require significant staff time, given that we do not have resources available at this time to support the review of content, which would be required for posting. The NOP will keep the Board informed through the PDS, since that is the group that initiated the recommendation. The Chair asked if it was possible to accept comments via email and simply forward them to the Board members without posting them. MA will explore this.
 - The workplan table has been updated with the 2014 workplan items and will replace the one above in the next set of notes. Additionally, a 2014 milestone timeline has been added below and will replace the fall 2013 milestones.

Upcoming meetings and agenda items:

2nd and 4th Thursdays at 2:00pm ET, 11am PT:

October 10, 2013 2:00pm ET (CANCELLED)

November 14, 2013 2:00 ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	CANCELLED
Fall 2013 NOSB Meeting – Louisville, KY	CANCELLED

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Fall 2013 proposals due to NOP	Feb 26, 2014
NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014