

Jan. 5, 2011

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20585
agsec@usda.gov

Dear Secretary Vilsack:

The Organic Trade Association (OTA) applauds the U.S. Department of Agriculture's recent actions to consider the broad economic consequence of unrestricted deregulation of Round-up Ready (RR) Alfalfa, including the impact to organic agriculture and products in the United States. OTA and its members embrace the opportunity to join in the discussion among all agricultural stakeholders to develop a framework for co-existence. As a result, we have taken steps following the Dec. 20 stakeholder meeting to move this important dialog forward. Co-existence, however, is not something one party can move forward independently; all sides must choose to co-exist in order for it to be at all meaningful.

The organic sector is an important part of a diverse U.S. agricultural economy—a 26.6-billion-dollar-a-year industry that employs tens of thousands around the country, and helps keep at least 14,540 family farms operating in our rural countryside. Except for 2009, the organic industry has experienced double digit growth—often over 20% every year—for over a decade. Organic farms, according to The 2008 Organic Production Survey conducted as a follow-on to the 2007 Census of Agriculture, showed an average profit of \$45,697, versus \$25,448 for non-organic farms. Organic operations are entrepreneurial, and play a role in revitalizing American's rural economy, an issue that we know is a high priority for you. As our country has been dramatically impacted by the worst economic downturn in 80 years, the organic industry has remained in positive growth territory and has come out of the recession hiring, adding farmers and increasing revenue.

The continued health and growth of the organic industry require that our supply chain not be compromised. Contamination by the increased unrestricted planting of GMO crops presents a grave threat to our ability to meet growing consumer demand. GE-contaminated organic crops and products lose their market value, and the costs to prevent contamination and testing to verify that crops and products are free of such contamination are all currently borne solely by the organic industry. Contamination has real economic consequences to organic farms and product manufacturers. Export markets, critical to the future growth of our industry, are put at real risk as numerous countries restrict the import of crops containing GE events. Our consumers simply will not accept GE-contaminated products. That is, in fact, one of the major reasons that they buy USDA certified organic products.

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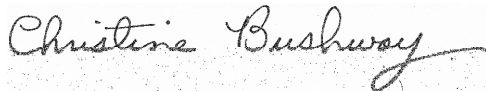
OTA's membership, including the full organic supply chain from single operator growers to *Fortune* 250 companies, has opposed unconditional deregulation, insisting that policy decisions regarding GE regulation should:

- Shift the costs associated with enabling meaningful co-existence from the organic and non-GE sectors to the patent holders of the GE crops,
- Protect organic seed crops, and
- Assure good implementation through public oversight of requirements to avoid contamination in the first place.

USDA's recent action does show a shift in USDA policy regarding GE deregulation in that one option under consideration includes mandated agricultural practices, isolation distances and geographic restrictions to reduce the likelihood of contaminations to protect all producers from market losses due to unrestricted deregulation of GE crops and products. We truly appreciate this recognition of the threat to our industry, and appreciate all you have done to put this concern on the table.

Throughout January, OTA will focus its efforts on this issue by supporting our members' involvement in industry-led working groups related to USDA's proposals in the RR Alfalfa EIS and providing specific comment and constructive input to USDA on the EIS and regulatory alternatives by the January 24 deadline. OTA thanks the department again for considering the impact of GE regulatory decisions on the future health of our industry as well as other identity-preserved sectors of U.S. agriculture. We look forward to working with you to protect a diverse, vibrant and profitable U.S. agricultural economy.

Sincerely,



Christine Bushway
CEO and Executive Director
Organic Trade Association

Cc: Kathleen Merrigan, Deputy Secretary