

OSA Field Day Topic Areas of Discussion:

1) Organic Seed Rule

- a. *Must use organic seed & planting stock when commercially available*
 - i. *Commercial Availability: Obtain an input in appropriate form, quality & quantity*
 - ii. *Can plant conventional, untreated seed if not commercially available (3 sources)*
 - b. *Non-organic seed cannot be treated with any prohibited substances*
 - c. *Seed cannot be product of genetic engineering or a genetically modified organism*
- 2) Many individuals and organizations involved in the organic industry, including the National Organic Standards Board, have requested that certification inspectors and certifying agents enforce § 205.204, as this would close the loophole and establish a strong and more predictable market for organic seed. The reasoning is that the demand would then stimulate production, which would increase the varietal availability and quality of organic seed.
- 3) Nov. 2017: NOSB took up seed policy proposal from crops subcommittee. Designed to:
- a. update the organic seed regulation
 - b. strengthen the National Organic Program's (NOP) organic seed policy guidance document for certifiers. The NOSB voted to send the proposal back to the Crops Subcommittee for additional tweaking

The proposal recommends an update to the organic seed rule by requiring farmers to demonstrate annual improvements in organic seed sourcing until they reach full compliance; also source from 5 sources if they use conv. Non-gmo seed of at-risk crops. The recommendation allows certifiers flexibility in working with operations to meet this goal, including how best to measure improvement. The proposal also provides detailed recommendations for improving the NOP's 2013 guidance document on organic seed and planting stock ([NOP 5029](#))

This proposal is slated to be brought up at the Minneapolis NOSB meeting but even if the NOSB passes the proposal and recommends that the NOP make these changes that is no guarantee it will be adopted.

Ways to set-up variety trial that will support Organic Seed Rule

Can be a great way to determine equivalence & quality of other organic varieties to your preferred variety but the test must be properly set up so you know what you're measuring.

Suggestion is to add variety trialing not under record keeping but under production practices.

On-farm variety trials of organic seed may be used by producers to evaluate equivalency and quality of varieties that are available as organic seed. Trials are encouraged and records should be kept of results to show inspectors but are not mandatory.

Main thing is to document specific characteristics in your variety trial.

What steps will a certifier make you take to document 'equivalency'.

Yes, "commercial availability" would not be a variety, but the characteristics that a particular seed claims to make available in a finished product, including the ones you mentioned in your e-mail query. The organic client should become clear about what qualities they are looking for, then search for those qualities from at least three companies that offer organic options for that seed, and then document which qualities were not available from whom, when, and be prepared to verify that at their inspection, if they found those qualities to be unavailable, and chose to use a non-organic, untreated, non-genetically modified version of that seed type.

Qualities:

- 1) Yield
- 2) Earliness
- 3) Disease Resistance
- 4) Height, Standability, Plant characteristics
- 5) Quality
- 6) Etc.

FROM MOSA:

*We encourage our clients to conduct trials of new **organic** varieties on their farm as a means for increasing the overall percentage of organic varieties used on their farm over time.*

We do support the use of saved seed - They don't have to prove that their saved seed is "better" than commercially available organic seed - we just need to be able to ensure that its production was compliant. And if they're trying to save an endangered variety from another local operation, they'd need to do a search, and then provide an untreated attestation from the grower.

Question: What Crops suffer from a lack of available organic varieties?