

# WILLAMETTE VALLEY SPECIALTY SEED ASSOCIATION

## Stewardship Policy for Products of Biotechnology

**OBJECTIVE:** Anticipate the release of traits from biotechnology (biotech) with a proactive set of policies designed to support coexistence, defined by the USDA AC 21 (Advisory Committee 21<sup>st</sup> Century Agriculture) to be the concurrent cultivation of conventional, organic, identify preserved (IP), and genetically engineered (GE) crops consistent with underlying consumer preferences and farmer choices.

### Goal #1

**Maintain a vibrant Stewardship Committee that is proactive to biotech changes in Oregon agriculture.**

- The Stewardship Committee must represent expertise from the development of a product to the end of its lifecycle.
- Regularly update a definition of the terms of biotechnology so that members are clear about what is included.

### Goal #2

**Develop a reasonable threshold of tolerance for each biotech trait so that a zero tolerance is not forced upon the industry.**

- Although global acceptance of genetically modified (GM) or GE crops and the adventitious presence of one or more biotech traits is not yet universal, WVSSA members agree to be leaders in developing solutions to this complex issue.
- Tolerances are a proactive method of limiting non-scientific input into WVSSA crop management, such as that of unqualified legislators, regulators unfamiliar with markets, or citizen activists.
- The threshold is likely to vary by species.
- Requires a literature review of pollen flow, at least in the most common WVSSA crops.
- Anticipates that research will be required 1) to establish functional thresholds that support coexistence, and 2) production methods to achieve compliance with thresholds. Assumes research on pollen travel, pollen viability, and effectiveness of pollen clouds within a field.
- Tests to support measurement of thresholds need to be detailed by 1) method, 2) testing agent, and 3) cost.

### Goal #3

#### **Engage trait owners in stewardship that complies with and supports WVSSA policy.**

- Secure the following conditions prior to the commercialization of WVSSA seed crops.
  - The technology provider must initiate an informative dialogue with the WVSSA prior to commercialization.
  - Commercialization of one or more traits should be preceded with thorough mutual considerations of coexistence with non-biotech crops.
  - Production standards that support the low-level presence of biotech traits should be defined.
  - The technology provider must demonstrate stewardship of the technology, including education and outreach to growers to assure compliance with stewardship practices.
- Bring additional trait providers into membership of the WVSSA. Build relationships with key companies driving national and international policy on the stewardship of traits based on ownership.
- Secure a knowledge of the insights and paths to stewardship that are common to trait providers. Learn to partner in mutual goals. Target strategies to coexist and reduce conflicts.
- Encourage trait owners to share common guidelines to protect ownership of valuable traits across pollination mechanisms.
- Develop definitions of coexistence with trait owners. Identify mechanisms that will be employed to allow coexistence, such as 1) genetic sterility, 2) geographic isolations or zones, and 3) production practices.
- Support the Biotechnology Industry Organization directly and through trait providers:
  - <http://www.bio.org/articles/about-bio/>
  - The Biotechnology Industry Organization (BIO) is the world's largest biotechnology trade association. BIO is a 501(c)(6) non-profit organization headquartered in Washington, D.C.
  - Provides advocacy, business development, and communications services for more than 1,100 members worldwide.
  - Mission is to be the champion of biotechnology and the advocate for member organizations - both large and small.
  - Food and Agriculture: Creates and advances industry policies on all food and agriculture biotechnology issues related to international affairs, government relations, science and regulatory affairs, and media and public affairs. Works for a safe and clean supply of healthy food for a growing global population.
- Connect to the Excellence Through Stewardship (ETS) industry program:
  - <http://excellencethroughstewardship.org/>
  - Excellence Through Stewardship Components:
    1. Principles and management practices for the responsible global management (for example, handling, governance, and oversight) of biotechnology-derived plant products. ETS provides training and technical resources to assist in the implementation of stewardship programs and quality management systems.
    2. Guides to Understanding and Implementing Stewardship Programs and Quality Management Systems. Guides are available on Stewardship, Product

Launch Stewardship, Maintaining Plant Product Integrity, Incident Response Management and Product Discontinuation.

3. A Global Stewardship Audit Process that involves members contracting for independent third-party audits of their operations to verify that stewardship programs and quality-management systems are in place.
- ETS Guides
    1. Guide for Stewardship of Biotechnology-Derived Plant Products.
    2. Guide for Product Launch Stewardship of Biotechnology-Derived Plant Products.
    3. Guide for Maintaining Plant Product Integrity of Biotechnology-Derived Plant Products.
    4. Guide for Incident-Response Management of Biotechnology-Derived Plant Products.
    5. Guide for Product Discontinuation of Biotechnology-Derived Plant Products.
    6. The BIO Handbook for Understanding and Implementing the Containment Analysis and Critical Control Point Plan for the Production of Plant-Made Pharmaceuticals and Plant-Made Industrial Products.
    7. CropLife International Compliance Management of Confined Field Trials for Biotech-derived Plants.

#### Goal #4

### **Engage Oregon growers in the requirement for a Stewardship Policy for the Oregon seed industry.**

- Enlist the support of the leaders of grower groups and over time expand the effort to reach out to all growers.
- Educate and build win/win strategies with growers as represented by such groups as the Specialty Seed Growers of Western Oregon (SSGWO), Oregon Seed Council, the Oregon Seed Growers League, and commodity commissions.
- Engage a broader grower base by networking with other commodities, for example, the Oregon Wheat Growers League (OWGL).
- Provide grower training in the implementation of production practices that will support coexistence and meet minimum thresholds. Provide training workshops as often as is required to inform and update growers.
- Solicit input for biotech crop management from grower warehouse owners and operators. Incorporate recommendations into policy where appropriate and add to training exercises.

#### Goal #5

### **Network with other organizations, associations, and agencies that can provide strength, support, and sustainability to WVSSA Stewardship Policy.**

- WVSSA must be sure that association policy is consistent to the extent possible with other state, regional, and national policies and with international (ISF) policy.

- ASTA is a powerful partner in building policy and communicating it to the industry. OSA must utilize the people and purposes of ASTA, specifically soliciting ASTA input and messaging.
- Reach out to partner with state and regional seed associations in order to educate beyond Oregon borders, including groups such as the Idaho-Eastern Oregon Seed Association (IEOSA), the Washington-North Idaho Seed Association (WNISA), the California Seed Association (CSA), and the Pacific Seed Association (PSA).
- Partner with the Oregon Department of Agriculture (ODA) to protect and expand markets, strengthen seed laws to the advantage of seed companies, their customers, and their growers, nurture relationships in state government, and advise on policy.
- Investigate an ODA public/private partnership that consists of mutually understood stewardship that starts with policy making by the WVSSA and considers mechanisms of compliance enforcement by ODA.
- Expand political connections and resources in order to be proactive in the face of competing interests or values. Examples include, but are not limited to, Oregonians for Food and Shelter (OFS), Pac/West, and the Oregon Farm Bureau (OFB).
- Support the U.S. Biotech Crops Alliance (USBCA).
  - Established by several organizations under a memorandum of understanding signed in 2012.
  - The USBCA has been developing and working to “implement consensus positions on key policy issues designed to improve the introduction, stewardship, domestic and international regulatory policy, and distribution in U.S. and export markets of commodities and processed products containing or derived from modern biotechnology.”
  - Broad-based national initiative that currently consists of 11 influential national organizations representing U.S. biotechnology providers: National Corn Growers Association, American Soybean Association, American Seed Trade Association, Biotechnology Industry Organization, National Grain and Feed Association, North American Export Grain Association, American Farm Bureau Federation, Corn Refiners Association, National Oilseed Processors Association, U.S. Grains Council, and U.S. Soybean Export Council.
- Support the USDA AC 21 (Advisory Committee 21<sup>st</sup> Century Agriculture) model as reported November 19, 2012. Conclusions were reported in the areas of 1) Research, 2) Education and Outreach, 3) Stewardship, 4) Seed Quality, and 5) Potential Compensation Mechanisms.
  - Research
    1. Data collection for losses, unintended presence, actuarial soundness, mitigation of gene (pollen) flow, efficacy of best practices.
    2. Encourage coexistence in SARE (Sustainable Agriculture Research and Education program)
    3. Build monitoring procedures on transgenic alfalfa pollen.
    4. Involve the outside scientific community.
    5. Hold a conference for experts on gene (pollen) flow mitigation.
  - Education and Outreach

1. Public input and a workshop to foster and exchange ideas on strengthening coexistence.
  2. Gather case studies to support improvements in competitive coexistence.
  3. Work with the seed industry on stewardship tools.
  4. USDA should provide funding to strengthen the understanding of coexistence among diverse agricultural systems.
- Stewardship
    1. Farmers must be more aware of the implications of a breakdown in coexistence—neighbor to neighbor.
    2. USDA should support industry measures to coexist, such as models of grower contracts or production guidelines.
    3. USDA should support local and national mechanisms to coexist, which could be very crop or market specific.
    4. Voluntary traditions among farmers are strongly supported compared to mandates and regulations.
    5. USDA should design outcome-based strategies for facilitating productions of all crop types.
  - Seed quality
    1. Launch the National Genetic Resources Advisory Council and hold meetings.
    2. Evaluate and strengthen the Organic Seed Finders database.
    3. Review and evaluate current practices for testing, monitoring, and maintaining the purity of publicly held germplasm and improve as needed.
    4. In an age of ever-increasing technical capabilities for testing and detection, it is not realistic to suggest that commercial seed producers can guarantee zero presence of unintended genetics in seed.
  - Potential compensation mechanisms
    1. Any mechanism should be based on a crop insurance model, be preceded by a finite, pilot program, and require joint coexistence activities.
    2. Claims of economic loss in IP crops must be actual.
    3. Build actuarial economic structure for organic crops, including a premium for this crop type.
    4. Begin recognizing some organic prices under the Noninsured Crop Disaster Assistance Program for 2014.
    5. Investigate elimination of crop insurance surcharges for organic crops.
    6. Execute Research and Outreach plans.