Memorandum

To: Shawn Clausen, President

Andrew Eddie, Vice President

From: Rebecca Hull, Member

Date: July 29, 2019

Re: Proposal to Mandate Certification of Non-Genetically Enhanced Alfalfa for Export

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As a member of Washington State Hay Growers Association, I am proposing a change in regulation that will require testing and certification of non-genetically enhanced (GE), also known as organic, alfalfa for export.

In 2014 the USDA loosened regulation on the export of Roundup Ready® alfalfa (RRA) but sensitivity in the overseas market continues to grow, increasing demand for organic alfalfa. This has many of our growers coexisting between conventional, GE, and organic alfalfa seed and hay productions (Cornish, 2015).

WSHGA has always taken the stance that we believe in a science-based stewardship that allows the coexistence of different markets and methodologies of production. This requires collaboration between growers to improve methods.

The Problem

As a certified organic alfalfa producer that exports to overseas markets, our operation relies on practices that prevent cross-contamination with non-organic crops. Our neighboring non-organic producers do their due diligence to help us maintain our organic certification. We test seeds prior to planting, our plants during maturation, and yields after first cutting for

any GE traits. We are positive our product is organic before export (DePeters, 2008).

The problem lies on the receiving end. Our contracts with overseas buyers stop short of requiring them to keep a purchased product. Even with our organic certification, if an importer tests the product and it is determined to have a GE trait, they can return the product at extreme costs to the exporter and producer.

This happens because of cross contamination during shipment. Certified organic alfalfa is frequently stored next to non-certified organic alfalfa (Van Deynze, 2008).

Our importer's argument is that while a producer may be certified organic by a federal agency, there is no uniform certification among all non-GE producers. They simply cannot trust the individual producer.

The Solution

I am proposing we as alfalfa producers, vote to have the National Alfalfa & Forage Alliance (NAFA) test seeds, crops, and yields for GE traits. This will range from $3 to $7 per acre. Certification of organic status would come from the USDA, costing $1200 every three years or whenever crops are rotated (USDA, 2019).

This solution may feel like a loss of autonomy or a risk of added costs. This is not the case. Individual producers can choose to grow conventional, organic, or GE crops. They can even rotate them through their own operations. Under this regulation, rotation would require recertification of organic status, or the producer has the choice to rotate in non-organic alfalfa when the three-year certification expires (USDA, 2019).

These parameters will provide some stabilization in the organic alfalfa market. Federal testing and certification requirements would hold all organic alfalfa producers to the same standard.

Cross-contamination during shipment wouldn't be a risk because your product is stored next to other tested and certified product (WSU, 2008).

A higher standard of production through federal testing and certification, would allow producers and exporters to rewrite contracts with overseas buyers, allowing forced receipt of product. The argument being, if an importer tests the product and reveals a GE trait, there is a malfunction on the receiving end. This move alone could save hundreds of thousands of dollars a year in potential return shipping costs.

Benefits

- Stabilization within organic alfalfa market.
- Same standards of production among organic operations.
- Lowest risk of cross-contamination during production and shipment.
- Allows producers/exporters to force receipt of product.
- No risk of extreme return shipment costs to producers/exporters.

The Columbia Basin's organic alfalfa producers are not held to a uniform standard. Voting in this regulation will level the playing field, help stabilize the market, and provide security for our growers. Please consider your fellow alfalfa producers and the Columbia Basin economy when making your decision. Thank you.

References

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