

A Greener World's Certified Non-GMO by AGW Standard Amendment Proposals 2019

Proposed changes are listed below. Please send any comments you have on the proposed revisions to julie@agreenerworld.org no later than December 15, 2019.

1. Introduction

Previous:

Certified Non-GMO by AGW represent the clearest standards for Non-GMO certification. The seal may be applied to raw materials and finished products only once a valid certificate has been issued.

New paragraph:

Certified Non-GMO by AGW represent the most transparent, practical standards for Non-GMO certification. The seal may be applied to raw materials and finished products only once a valid certificate has been issued.

2. Introduction

Previous:

For Category 1 certification the following Certified Non-GMO by AGW program standards must be met.

New:

For Category 1 certification the Certified Non-GMO by AGW program standards below must be met and comprise the entire standards. The standards for Category 1 certification begin at standard 18.1 Inputs for livestock and crop production.

Decision: Swap Category 1 and Category 2 criteria so that Category 1 products are for all animal products and Category 2 are for non-animal products. Specify Category 1 products include all standards and Category 2 has specific exclusions.

3. Introduction

Previous:

On August 19, 2016, FSIS issued Notice 54-16, which approves the use of "Non-GMO" labeling of meat, poultry and egg products verified to be produced without the use of bioengineered ingredients. Upon completion of the Certified Non-GMO by AGW approval process, successful applicants may choose to use the term "Non-GMO" or "Non-GE" under the Certified Non-GMO by AGW module on product labels (see Standard 18.8.1).

New:

On August 19, 2016, FSIS issued Notice 54-16, which approves the use of "Non-GMO" labeling of meat, poultry and egg products verified to be produced without the use of bioengineered ingredients, provided the claim is verified by third party. Upon completion of the Certified Non-GMO by AGW

approval process, certified producers may choose to use the term “Non-GMO” or “Non-GE” under the Certified Non-GMO by AGW module on product labels (see Standard 18.8.1).

4. Introduction

Addition of information to address emerging biotechnology and labeling.

New:

Emerging biotechnology: In addition to genetic modification of organisms, AGW recognizes biotechnology, including (but not limited to) gene editing and gene silencing, pose specific risks to our food system. Due to emerging biotechnology and breeding techniques such as meganucleases and clustered regularly interspaced short palindromic repeats (CRISPR), Transcription activator-like effector nucleases (TALEN), Zinc finger nucleases (ZFN), RNA interference (RNAi)—as well as other techniques—detection of these methods can be difficult. For the purpose of the Certified Non-GMO by AGW standards, all emerging biotechnology will be considered “GMO,” and as such, the Certified Non-GMO by AGW standards apply accordingly.

Ensuring Informative Labeling: While Certified Non-GMO by AGW is designed to differentiate non-GMO products from their GMO counterparts, A Greener World may consider certifying products or ingredients which are not known to be genetically modified under one or more of the following circumstances:

- There is a documented risk of supply chain or processing contamination. Any label use must be accompanied by a phrase indicating that while raw ingredients are not commonly genetically modified, AGW certification ensures no GMO contamination in processing.
- There is a need for consumer education or to provide accurate information about genetic modification in food. Any label use must be accompanied by a phrase indicating that the product in question is not known to be genetically modified.

5. 18.1

Previous Section Title: Inputs for livestock production.

New Section Title: Inputs for livestock and crop production.

6. 18.1.1

Previous Standard:

Certified Non-GMO by AGW products must be produced without the use of Genetically Engineered products (GMOs).

New Standard:

Certified Non-GMO by AGW products must be produced without the use of *Genetically Modified Organisms* (GMOs).

Note: For farms that raise non-GMO animals, but grow GMO crops, there must be documented commitment to transition the farm to a fully non-GMO operation within 3 years. Farmers with complete segregation may be considered for derogation.

7. 18.1.7

Previous Standard:

Veterinary and health care products containing GMOs or their derivatives are prohibited. This includes the use of medicines, vaccines, and parasiticides.

New Standard:

Knowingly using veterinary and health care products containing GMOs or their derivatives are prohibited. This includes the use of medicines, vaccines, and parasiticides.

8. 18.2.1

Previous Standard:

18.2.1 Each operation must have an implemented, written, statistically valid sampling and testing protocol that provides at least 90% confidence in quantifying GMOs to the threshold levels specified in standard 18.4.9.

The protocol must cover high and moderate risk feeds and other inputs and must include:

18.2.1.1 The feeds and other inputs used by the farm in the production of Certified Non-GMO by AGW meat, milk and eggs and their source.

18.2.1.2 The types of testing used by the farm (i.e. qualitative or quantitative, strip tests, PCR tests) and which tests are used for which products and why.

18.2.1.3 The frequency of testing.

18.2.1.4 The tolerances for detection of GMOs and the action taken when samples exceed these.

Note: Farms that only have low risk feeds and inputs – for example farms that only have pasture or rangeland and only have Certified Grassfed by AGW livestock - do not need to have a testing protocol.

New Standard:

18.2.1 Each operation must have an implemented, written, statistically valid sampling and testing protocol that provides at least 90% confidence in quantifying GMOs to the threshold levels specified in standard 18.4.9.

The protocol must cover high risk feeds and inputs and must include:

18.2.1.1 A risk analysis of all feeds and other inputs and implemented procedures to mitigate risk (See Appendix 3 to determine risk).

18.2.1.2 The feeds and other inputs used by the farm or facility in the production of Certified Non-GMO by AGW products.

18.2.1.3 The types of testing used by the farm or facility (i.e. qualitative or quantitative, strip tests, PCR tests) and which tests are used for which products and why.

18.2.1.4 The frequency of testing.

18.2.1.5 The tolerances for detection of GMOs and the action taken when samples exceed these.

18.2.1.6 The volume and use of high risk products.

Note: Farms or facilities that only have low risk feeds and inputs – for example farms that only have pasture or rangeland and only have Certified Grassfed by AGW livestock - do not need to have a testing protocol.

9. 18.3.1

Previous Standard:

Lateral flow strip tests can only be used as the sole test for products deemed to be low risk.

Note: An example of a low risk product would be crops grown by a neighbor with no surrounding GMO crops of the same species or any other risk of contamination with GMO crops.

New Standard:

Lateral flow strip tests can be used as the sole test for products deemed to be moderate or high risk only if a quantitative PCR analysis is performed, at minimum, annually.

Note: An example of a low risk product would be crops grown by a neighbor with no surrounding GMO crops of the same species or any other risk of contamination with GMO crops that could result in a GMO event.

10. 18.3.5

Previous Standard:

18.3.5 Quantitative PCR testing must be used for products deemed to be high risk that are grown, fed or otherwise used for the production of Certified Non-GMO by AGW meat, milk or eggs.

New Standard:

18.3.5 Quantitative PCR testing must be used for products deemed to be high risk that are grown, fed or otherwise used for the production of Certified Non-GMO by AGW products.

11. 18.4.1

Previous Standard:

If there is a risk that products used to produce Certified Non-GMO by AGW products are GMO or are contaminated by GMO material, samples must be tested.

Note: This could include products that are otherwise classed as “low risk” that have (for example) come from sources with previous contamination incidences.

If a viable commercial test is not available, other forms of validation may be considered on a case by case basis.

New Standard:

If there is a risk that products used to produce Certified Non-GMO by AGW livestock products are GMO or are contaminated by GMO material, samples must be tested.

Note: This could include products that are otherwise classed as “low risk” that have (for example) come from sources with previous contamination incidences.

If a viable commercial test is not available, other forms of validation may be considered on a case by case basis.

AGW recognizes testing of finished product may not effectively identify all cross-contamination events. AGW may accept valid documentation in lieu of testing samples on a case by case basis.

12. 18.4.2

Previous Standard:

Testing of high-risk inputs, or products containing high-risk inputs when those are accompanied by valid Non-GMO documentation must occur at least quarterly.

New Standard:

Testing of high-risk inputs, or products containing high-risk inputs when those are accompanied by valid Non-GMO documentation must occur at least quarterly. (See Standard 18.2.1.6)

13. 18.4.5

Previous Standard:

Anyone carrying out testing must be trained and tested in the particular method of testing in use.

New Standard:

Anyone carrying out testing must be trained and demonstrate proficiency in the particular method of testing by a qualified expert.

14. 18.4.10

New Standard:

Documentation of disposition of non-compliant product must be kept.

15. 18.5.4

Previous Standard:

Certified Animal Welfare Approved by AGW must be informed if the farmer is aware of any GMO crops of the same species as their Non-GMO crops being grown on neighboring land.

Note: The wind and bees may carry GMO pollen that can cross-contaminate Non-GMO crops.

New Standard:

Certified Non-GMO by AGW must be informed if the farmer is aware of any GMO crops of the same species as their Non-GMO crops being grown on neighboring land.

Note: The wind and bees may carry GMO pollen that can cross-contaminate Non-GMO crops of the same species (See Appendix 1).

16. 18.6.1

Previous Standard:

Dedicated Non-GMO equipment and facilities for harvest, cleaning, storage and transport must be used when available.

New Standard:

Dedicated Non-GMO equipment and facilities for harvest, cleaning, receiving, production, processing, manufacturing, storage and transport must be used when available.

17. 18.6.2

Previous Standard:

If dedicated Non-GMO equipment and facilities for harvest, cleaning, storage and transport are not available, there must be documented cleaning procedures between use for GMO or potential GMO crops and use for Certified Non-GMO by AGW products.

New Standard:

18.6.2 If dedicated Non-GMO equipment and facilities for harvest, cleaning, receiving, production, processing, manufacturing, storage and transport are not available, there must be documented cleaning procedures between use for GMO or potential GMO inputs and use for Certified Non-GMO by AGW products. A record of cleaning must be kept.

18.6.2.1 A risk assessment must be carried out to demonstrate lack of contamination (e.g. cleanliness). If contamination is found, action must be taken to mitigate risk.

18. 18.6.3

New Standard:

Segregation measures, including labeling, must be in place during production to keep compliant inputs, work in progress, and finished products separate from all materials that are not compliant with Certified Non-GMO by AGW standards.

19. 18.6.4

Previous Standard:

Corn for use (e.g. as animal feed) for any Certified Non-GMO by AGW product must not be grown alongside any known crops of GMO corn.

Note: The definition of “alongside” for this standard is a field that shares a boundary with any field used to grow GMO corn.

New Standard:

Corn for use (e.g. as animal feed) for any Certified Non-GMO by AGW product must not be grown alongside any known crops of GMO corn.

Note: The definition of “alongside” for this standard is a field that shares a boundary with any field used to grow GMO corn. Planting schedules must be developed to prevent cross-pollination either by distance, planting cycles, or barriers.

(Note: standards previously numbered 18.6.3-18.6.8, have been renumbered to 18.6.4-18.6.9, respectively)

20. 18.6.9

Previous Standard:

When pollinators are rented, Certified Non-GMO by AGW farms must ensure that these have not previously been used in proximity to fields where GMO crops were grown.

New Standard:

When pollinators are rented, Certified Non-GMO by AGW farms should ensure that these have not previously been used in proximity to fields where GMO crops were grown within the past 24 hours.

21. 18.7.3

Previous Standard:

There must be records for each batch of Certified Non-GMO by AGW further processed product covering amount, source and non-GMO status of all ingredients used.

New Standard:

There must be records for each batch of Certified Non-GMO by AGW further processed product covering amount, source and non-GMO status of all ingredients used. Records of products containing the Certified Non-GMO by AGW logo must be able to demonstrate traceability back to the purchase of the individual ingredients produced and purchased.

22. 18.7.4

New Standard:

18.7.4 Exemptions from on-site inspections may be granted in the following circumstances:

18.7.4.1 In facilities where there is no processing of high-risk ingredients.

18.7.4.2 In facilities dedicated to certified organic production.

18.7.4.3 In facilities previously approved for another **Certified Non-GMO by AGW** product.

Note: For 18.7.4, verification of the supply chain must be completed.

23. 18.7.5

New Standard:

18.7.5 Employees must be trained to ensure Certified Non-GMO by AGW product integrity. Records of the training must be kept.

18.7.5.1 At minimum, employees must receive initial and annual refresher training.

24. 18.7.6

New Standard:

Documented records of supplier approval and monitoring process of inputs to be Certified Non-GMO by AGW must be kept.

25. 18.8.4

New Standard:

If there is a need for consumer education or to provide accurate information about genetic modification in food, a phrase indicating that the product in question is not known to be genetically modified must be clearly legible somewhere on the packaging.

26. Appendix 1 – High, Moderate and Low Risk Products

High-risk Products

Addition:

Creeping Bentgrass
Salmon
Eggplant (Aubergine)
Pineapple
Apples
Mushroom
Orange
Sugarcane
Tomato
Spider Silk

Moderate-Risk Products

Addition:

Camelina (false flax)
Mustard

27. Appendix 2

Add International Variations of Standards Compliance