



A GREENER WORLD
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**Certified Non-GMO by AGW (CNGMO) Standards Amendment Proposals
July 2020**

Proposed changes to 2020 standards are listed below. Please send any comments you have on the proposed revisions to julie@agreenerworld.org no later than August 22, 2020.

1. New introductory paragraph

Proposed paragraph:

The standards may be applied to the following: Products for human consumption such as crops, meat, eggs, and dairy; ingredients used in the production of food products such as processing aids, livestock feeds, and silage inoculants; ingredients intended for human use such as cosmetics and clothing.

For the purpose of these standards, gene editing and gene silencing are considered genetic modification and are prohibited.

2. Add note to Categories

Current:

Certified Non-GMO can be applied to two categories:

Category 1: Products that contain any animal product. (All standards apply)

Category 2: Products that contain no animal products. (The following standards do not apply: 18.01, 18.02, 18.03, 18.04, 18.1.3, 18.1.7, 18.1.8)

Proposed:

Certified Non-GMO can be applied to two categories:

Category 1: Products that contain any animal product. (All standards apply)

Category 2: Products that contain no animal products. (The following standards do not apply: 18.01, 18.02, 18.03, 18.04, 18.1.3, 18.1.7, 18.1.8)

Note: AGW reserves the right not to certify products that do not meet the overall aims of all the AGW programs.

3. Amend 18.1 Inputs for livestock and crop production

Current:

18.1 Inputs for livestock and crop production.

Proposed:

18.1 Inputs for livestock, crop production and processing.

4. Amend 18.1.4 Use of fertilizers

Current:

18.1.4 The use of fertilizers containing GMOs or their derivatives must not be used on crops or range/pasture land used for feeding and raising livestock that will produce **Certified Non-GMO by AGW** meat, milk or eggs.

Proposed:

18.1.4 The use of fertilizers containing GMOs or their derivatives must not be used on crops or range/pasture land used for feeding and raising livestock that will produce **Certified Non-GMO by AGW** meat, milk or eggs or on land that will produce crops used in a Certified Non-GMO by AGW product.

5. 18.1.5 Add crops used in further processed products

Current:

18.1.5 The use of pesticides containing GMOs or their derivatives must not be used on crops or range/pasture land used for feeding and raising livestock that will produce **Certified Non-GMO by AGW** meat, milk or eggs.

Proposed:

18.1.5 The use of pesticides containing GMOs or their derivatives must not be used on crops or range/pasture land used for feeding and raising livestock that will produce **Certified Non-GMO by AGW** meat, milk or eggs or on land that will produce crops used in a Certified Non-GMO by AGW product.

6. 18.1.6 Clarify standard on inoculants

Current:

18.1.6 The use of inoculants containing GMOs or their derivatives is prohibited for any crops or feedstuffs for livestock that will produce **Certified Non-GMO by AGW** meat, milk or eggs.

Proposed:

18.1.6 The use of inoculants containing GMOs or their derivatives is prohibited for any **input used in the production of Certified Non-GMO by AGW products (e.g. milk, eggs or meat cannot be produced from livestock fed a GMO-inoculated crop).**

7. New Standard Testing Protocols

Proposed Standard:

18.2.3 The protocol must detail the process that is followed when these thresholds are exceeded.

8. Clarify Note 18.3 Types of Testing

Current:

Note: the type of testing protocol must be matched to the potential risk.

Proposed:

Note: the type of testing must be matched to the potential risk.

9. Clarify 18.4.7 Testing

Current:

18.4.7 If high-risk products are imported onto the farm, whether as individual products or as part of a blend, a Non-GMO declaration must be provided by the supplier.

Proposed:

18.4.7 If high-risk products are imported onto the farm **or into a facility**, whether as individual products or as part of a blend, a Non-GMO declaration **or a valid Non-GMO certificate** must be provided by the supplier.

10. New Standard on Testing

Proposed:

18.4.11 The Certified Non-GMO by AGW program must be notified of any test result exceeding the action threshold(s) and the corrective actions taken. (See Standard 18.4.9)

11. 18.6.2 Amend Avoidance of Contamination

Current:

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.

Proposed:

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 **including the quantity of product required for bleed or purge runs if appropriate** between use for GMO or potential GMO inputs and use for Certified Non-GMO by AGW products. A record of cleaning must be kept.

12. New standard Further Processed Products

Proposed:

18.7.3 **Ingredients purchased must either be accompanied by a Non-GMO declaration from the supplier or carry a Non-GMO certification from a program at least equivalent with the requirements of the Certified Non-GMO by AGW program.**

13. Clarify 18.7.3 Further Processed Products

Current:

18.7.3 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.

Proposed:

18.7.4 There must be records for each lot or batch of Certified Non-GMO by AGW further processed products to **enable full traceability of each ingredient** covering **quantities, lot or batch numbers, sources, dates received** and **their** Non-GMO status.

14. New standard Further Processed Products

Proposed:

18.7.8 The record keeping system must demonstrate the facility has bought or received sufficient Non-GMO ingredients for the quantity sold or dispatched of Certified Non-GMO by AGW labeled products.

15. Addition to Appendix 1 high, moderate and low risk products; Amendment to remove “wheat” from moderate risk products

Current:

Appendix 1 – High, Moderate and Low Risk Products

Moderate risk products include the following:

- *Camelina (false flax)*
- *Mustard*
- *Flax*
- *Wheat*
- *Beta vulgaris, (e.g., chard, table beets)*
- *Brassica napa (e.g., rutabaga, Siberian kale)*
- *Brassica rapa (e.g., bok choy, mizuna, Chinese cabbage, turnip, rapini, tatsoi)*
- *Curcubita pepo (e.g., acorn squash, delicata squash, patty pan squash, pumpkin, and spaghetti squash)*

Proposed addition:

Products otherwise listed as low or moderate risk will be considered high-risk if imported from the following countries:

- China
- Egypt
- Kazakhstan
- Moldova
- Russian Federation
- Turkey
- Ukraine

Proposed edit (remove wheat):

Moderate risk products include the following:

- *Camelina (false flax)*
- *Flax*
- *Beta vulgaris, (e.g., chard, table beets)*

- *Brassica napa* (e.g., rutabaga, Siberian kale)
- *Brassica rapa* (e.g., bok choy, mizuna, Chinese cabbage, turnip, rapini, tatsoi)
- *Curcubita pepo* (e.g., acorn squash, delicata squash, patty pan squash, pumpkin, and spaghetti squash)

16. New standard Sustainability of fish sources

Proposed:

- 16.1.4** If a Certified Non-GMO by AGW product contains fish as an ingredient, the fish must come from fisheries with a valid certificate of sustainability or from byproducts of fish or aquatic species intended for human consumption.