

July 13, 2015

Congressman Mike Conaway, Chairman
House Committee on Agriculture
1301 Longworth House Office Building
Washington, DC 20515

Congressman Collin Peterson, Ranking Member

House Committee on Agriculture
1301 Longworth House Office Building
Washington, DC 20515

Chairman Conaway and Ranking Member Peterson:

As the largest organic dairy producer processor in the U.S., Aurora Organic Dairy would like to express its support for the amended version of H.R. 1599, dated July 12, 2015. Aurora Organic strongly believes that consumers have the right to know if genetically modified organisms (GMOs) are present in the products that they buy. As such, the labeling of products that indicate whether or not GMOs were used in production should be consistent across regulatory programs to avoid consumer confusion. Further, the regulations for use of such labels should have standards which do not cause conflict or competitive disadvantages. If passed, the amendment to H.R. 1599 in the nature of a substitute would address consumer confusion and unjust competitive disadvantages in the production of certified organic products from livestock. Aurora Organic urges the Committee to ensure the same result for all labeling of all certified organic products.

The substitute amendment to page 16 of the bill prohibits the use of genetic engineering in a cow or other livestock producing a product for human consumption bearing a non-GMO label. This prohibition includes feed, feed ingredients and feed additives that were produced with the support of GMOs as well as the use of biological products and other livestock pharmaceuticals developed from genetic modification. The only exceptions to this provision should be approved substances on the National List established under section 2118 of the Organic Foods Production Act of 1990 (OFPA). We believe these changes are necessary to eliminate an unfair competitive advantage allowed under the original bill language, which enabled a "non-GMO" label with lesser meaning and investment than the non-GMO requirements of OFPA.

Additionally, the substitute amendment on page 29 of the bill aligns the proposed labeling program with the Agricultural Marketing Act of 1946 and the National Organic Program. This change would make the "non-GMO" claim consistent to the greatest practicable extent with the current organic regulations, and ensures that product labeling will have the same standards across all voluntary labeling programs. Likewise, a new section added to Title II of the bill allows USDA certified organic food products to be automatically certified as non-GMO under the new USDA certification program.

We appreciate the Committee's consideration of these implications of H.R. 1599 on the organic food industry and urge Members to pass it as amended. Furthermore, we urge the Committee to maintain the intent described herein and reject any changes to the legislative language referenced above. If you have any questions, please do not hesitate to contact me.

Sincerely,



Scott McGinty
President
Aurora Organic Dairy