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Docket No. APHIS–2013–0042

My understanding is that the consideration the USDA focuses upon when deregulating genetically engineered seeds and crops, centers on the concern that the plant themselves do not become plant pests. However, many of these crops are herbicide resistant, and the use of the “partner herbicides” and their effects must also be considered. These seeds and the herbicides used on the subsequent crop are a package deal and therefore not only the effect of the biotech crop should be considered, but also the effect the herbicides used on those crops.

These new crops being considered now are being introduced due to the appearance of “super weeds” that have become resistant to Glyphosate (Round-Up). Basic biology tells us that the approval of this new GMO crop and the subsequent pervasive use of 2,4-D, will result in even more types of “super weeds”, wreaking havoc in our fields, along our roadsides, and in critical areas such as irrigation ditches and stream banks.

The approval of these new GMO corn and soybean crops must not be approved, in order to prevent an explosion of noxious weeds across the United States, and the subsequent widespread environmental damage they will cause by choking out crops, obstructing waterways and destroying biodiversity.

1. GMO corn of any type, sows its pollen through the wind, and spreads its genetic material throughout a large region. NonGMO farmers will lose access to markets due to genetic contamination from this proposed new GMO corn, as well as suffer diminished crop quality through loss of genetic purity that they feed their livestock or save for their own seed. I am not arguing a health and safety issue, although I wish there were a platform for this discussion. Instead, I believe we must address the importance of protecting our seed germplasm, and how essential it is to provide the choice to growers and consumers to not have unwanted genes in the crops they grow and consume.

Both proposed GMO corn and soybean crops are pests to other plants, because they lower the value and genetic purity of nonGMO crops grown both nearby and for miles around.

2. These crops will greatly increase the use of 2,4-D in the United States. It is a known fact that this herbicide easily drifts, and is especially dangerous because it volatilizes and travels in fog or humid air over great distances in comparison to Glyphosate. 2,4-D is a highly toxic herbicide and many fruits, vegetables and especially grapes, are highly sensitive to damage and death. I have personal experience with a neighbor who had damage to their crops by the long distance drift of 2,4-D. They were unable to obtain any compensation for the damage, since it was impossible to assign blame. The directly adjoining landowner had not applied the 2,4-D and the State of Wisconsin did not wish to search out the party who had applied the herbicide. The approval and wide spread use of 2,4-D will result in many victims of herbicide damage suffering losses that could result in the loss of their livelihoods or even their farms, since they will not be able to harvest their crops, nor get compensation for that loss.

The USDA has stated that all types of farming are encouraged in the United States. The expansion of our local foods movement will be halted in its tracks and greatly diminished, due to the losses suffered by the greatly expanded use of 2,4-D. The USDA should not allow this new generation of 2,4-D resistant crops to be deregulated.

These two proposed 2,4-D herbicide resistant plants are plant pests, because they will encourage the expanded use of 2,4-D which will damage or kill both annual and perennial specialty crop plantings in a wide area surrounding its use.

3. The property rights of the nonGMO farmer are violated every time a spec of GMO pollen cross pollinates with their nonGMO crop. While nonGMO farmers are in the minority, their rights are no less important than those of the majority. No farmer should suffer the loss of a crop they have worked hard to grow and market by an herbicide that cannot be traced back to a source due to its volatility.

The USDA must protect the nonGMO farmer's minority right to grow, feed, sell and consume nonGMO crops and not approve the planting of 2,4-D herbicide resistant GMO corn and soybeans.

It is also important to note the known detrimental human health effects of 2,4-D, a major component of "Agent Orange" used in the Vietnam War. Human exposure to 2,4-D may result in birth defects, Parkinson's disease, non-Hodgkin lymphoma and a host of other serious diseases.

The USDA must NOT APPROVE this new generation of GMO crops.

The Midwest Organic and Sustainable Education Service (MOSES) is an education-outreach organization working to promote sustainable and organic agriculture. MOSES serves farmers striving to produce high-quality, healthful food using organic and sustainable techniques. These farmers produce more than just food; they support thriving ecosystems and vibrant rural communities.

Sincerely,



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