

February 26, 2014

Re: Letter in response to Monsanto's proposed wheat research facility near Great Falls, MT

The Montana Organic Association would like to make a public comment regarding the efforts of the Monsanto Corporation to locate a wheat research facility near Great Falls.

While we realize that decisions about the re-zoning of the property to locate the lab in Great Falls must be left to Cascade County residents, we feel everyone should be aware that the location of Monsanto's research lab in Cascade County may have future consequences to both organic and non-organic farmers in Montana.

The Monsanto Corporation is one of the world leaders in developing, promoting and marketing genetically-modified seed. Even though the Monsanto Corporation has stated its current plan is to carry out traditional wheat-breeding experiments in the central Montana region, there is nothing to prevent Monsanto from carrying out whatever research it desires, now or in the future. The Monsanto Corporation's stated goal is to continue to develop and eventually introduce and sell genetically-modified varieties of wheat into the food chain. What better place to do that than in Montana?

Over the last year, a discovery of genetically-modified wheat plants in Oregon proved that Monsanto cannot contain its GMO genetic material or products, even in a research setting. Pacific Northwest farmers quickly discovered how US wheat customers abroad felt about the potential of GMO wheat in their food supply. Sales of PNW wheat were immediately suspended by our biggest customers, Japan and the Republic of South Korea. Four months of rigorous testing finally convinced the Asian markets that US wheat being offered for sale did not contain more GMO wheat.

But that was just one field, one location and one farmer. How will Montana protect thousands of acres, farmers and fields from GMO wheat? And if our wheat can as easily be contaminated, where will we sell the wheat? Could it even be sold at feed prices? That may be the choice many will be facing if GMO wheat production is not paired with transparent, 3<sup>rd</sup> party auditing and controls, that will regulate protocols, procedures, and testing.

The bottom line is there is a considerable risk to all farmers and their ability to market their wheat if GMO wheat development continues. The risk is even greater for Montana's wheat farmers as our keystone wheat markets overseas do not accept GMO grains and likely never will, and why would they? There are three other countries perfectly able and willing to export non-GMO wheat to our markets.

From the organic standpoint, Montana is the largest organic wheat producing state in the nation, and the USDA's National Organic Program mandates the exclusion of GMOs in organic production. GMO contamination of organic production, through cross-pollination or physical mixing, renders the product unacceptable to organic consumers and increases costs for organic producers. These costs include testing for GMO material and sometimes losing a premium price for these products, to name a few.

What about the United State's own consumers? An ABC News poll has found that two-thirds of the United States' consumers feel that genetically-modified food is unsafe and that most of them would not buy the food if they knew it contained GMO ingredients. Nationwide efforts to create GMO food labeling laws have proven that consumers are concerned. Both California and Washington tallied at least 45% of their population in favor of GMO labeling of food. Though these legislative efforts did not pass under majority rule, both showed that consumers want to know, and if not for the 4-to-1 monetary campaign by GMO supporters to defeat the initiatives, GMO labeling could very well already be in effect.

We hope that both the governing bodies and residents of Cascade County, and the State of Montana, carefully consider these points of view as decisions are made that affect the future of this region. The Montana Organic Association believes producers of both non-organic and organic production need to find ways to successfully coexist and grow in the future, but preventative measures must be put in place when it comes to how one's activities can affect another, and these controls cannot remain voluntary and left up to the private companies.

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