



National Alfalfa & Forage Alliance

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FOR IMMEDIATE RELEASE

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PRODUCERS ENCOURAGED TO COMMENT ON ROUNDUP READY® ALFALFA

Beginning December 18, 2009 – February 16, 2010

The long-awaited decision on the de-regulation of glyphosate-tolerant (GT) alfalfa (Roundup Ready or RR Alfalfa) has been made. There is plenty of time to make your comments before February 16, 2010.

USDA-APHIS, which regulates biotechnology traits, has completed a Draft Environmental Impact Statement (EIS) and has made it available at http://www.aphis.usda.gov/biotechnology/downloads/alfalfa/gealfalfa_deis.pdf. This was required by a legal decision in March of 2007 due to a lawsuit brought by Center for Food Safety.

APHIS' decision is as follows: "APHIS has made a preliminary determination that action should be taken, and that action will be to grant nonregulated status to GT alfalfa lines J101 and J163, in whole. The introduction of these GT alfalfa lines has no significant impact on the environment. These GT alfalfa plants, lines J101 and J163, are not plant pests and are unlikely to pose plant pest risks."

Now begins the long-awaited time for alfalfa producers to weigh in and provide comments to APHIS on its preliminary decision – should they be supported in this decision to allow commercialization of this trait (non-regulation) or should it continue to be regulated (not allow commercialization)? Has it addressed the important issues?

There are a range of issues associated with this technology, primarily:

- The claim that this trait causes excessive gene-flow to organic or conventional alfalfa fields which will prevent organic or conventional growers from farming as they wish, and will lead to eventual contamination of all alfalfa fields.
- The claim that the introduction of this trait causes much larger development of roundup-resistant weeds which will have an impact on the environment.

These were the two most critical issues in the lawsuit and the important issues that APHIS needed to address, along with market impacts.

Those who disagree with these claims argue that:

- Gene flow is primarily an issue with seed production (<1% of the acreage), and can be (and is) managed with isolation requirements in seed production. In hay crops, gene flow is largely prevented, since hay is mostly harvested before significant bloom. Techniques such as managing feral alfalfa and testing products using a simple test strip can assure customers of the non-GE status of hay or seed.
- Weed resistance to herbicides is an old problem with agriculture and not unique to RR alfalfa, and can be managed through diverse weed management strategies that have been developed over many years by weed scientists. If it occurs it will primarily have an impact on the effectiveness of Roundup, not the environment.

There are detailed publications on both of these issues, i.e., gene flow and on weed resistance (see links below).

APHIS has extensive documentation of its study of these issues, plus related market issues in the EIS statement. Please see their website The EIS alone is 1476 pages long, with documentation, but the critical issues can be easily found.

Keep in mind that this decision will impact the use of all genetically-engineered crops for alfalfa in the future (not just RR alfalfa) and perhaps for other crops as well.

TO SEE A LISTING OF EXISTING COMMENTS TO APHIS (scroll to the end to see the most recent):

<http://www.regulations.gov/search/Regs/home.html#docketDetail?R=APHIS-2007-0044>

To SUBMIT COMMENTS TO USDA-APHIS, SEE

<http://www.regulations.gov/search/Regs/home.html#submitComment?R=0900006480a6b7a1>

A link to the APHIS EIS document is there.

You may review the APHIS documents by starting here: <http://www.aphis.usda.gov/biotechnology/alfalfa.shtml>

The **National Alfalfa & Forage Alliance** documents on coexistence and seed stewardship, which came out of workshops over the past 3 years can be found at: <http://www.alfalfa.org/CSCoexistenceDocs.html>

Several **University of California** Documents related to biotechnology, coexistence of alfalfa types, and weed resistance can be seen at:

<http://alfalfa.ucdavis.edu/+producing/index.aspx?cat=Biotechnology%20and%20Roundup%20Ready%20Alfalfa>

To obtain a free copy of ***Gene Flow in Alfalfa: Biology, Mitigation, and Potential Impact on Production***, please visit: <http://alfalfa.org/publications.html>.

To see an **APHIS Frequently Asked Questions** brochure, please click the following link:

http://www.aphis.usda.gov/publications/biotechnology/content/printable_version/faq_alfalfa.pdf.