

Statement of
Nicholas Maravell, Maryland Organic Farmer
Before the
USDA Advisory Committee on
Biotechnology & 21st Century Agriculture (AC21)
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I am Nick Maravell, an organic farmer for the past 32 years.

Over the last 3 decades, I have been active in establishing organic legislation and regulations, advancing scientific organic research, and increasing awareness of organic methods and improving organic markets. I have worked through such organizations as the Organic Trade Association, the Organic Farming Research Foundation, the Maryland Organic Food and Farming Association, and Future Harvest-Chesapeake Alliance for Sustainable Agriculture. Currently, I serve on the National Organic Standards Board, a federal advisory committee mandated to advise the Secretary on materials and practices for organic agricultural and food production. Today I am commenting as an individual representing no organization.

I own and operate Nick's Organic Farm, located in Montgomery and Frederick Counties, Maryland. We have 170 acres under cultivation. We currently conduct on-farm research in conjunction with USDA's Beltsville Agricultural Research Center, and have previously cooperated with the University of Maryland and the Maryland Department of Agriculture.

We raise grass fed Angus beef, pastured chickens and turkeys, and free range eggs, vegetables, forages, corn, soybeans, barley, rye, and hairy vetch. Additionally, for the last thirty years we have also produced organic seed, including open pollinated corn and food grade soybeans. I

am particularly concerned about co-existence and compensation with regard to organic seed crops and GMO crops.

Right now, we have an unofficial “GMO Free Zone”—land on the urban fringe with miles of separation from conventional agricultural production. While we have rented this public land for 3 decades, it is currently under threat of private development, and so we face the prospect of trying to relocate. Desirable options are slim.

We own our farm in the next county, but GMO crops surround it. This farm is roughly 165 acres in a square configuration, with sides of 2700 feet. Standing dead center on our farm we can never be more than 1350 feet from our borders. Our average field size is 10 to 15 acres, and we constantly move our production as we have an 8 to 12 year rotation to build our soil and reduce our pest and weed pressure.

Under these circumstances, for open pollinated crops, isolation distance ceases to be an effective control measure for open pollinated seed corn production. Planting maturities timed to pollinate outside the window of the surrounding crops is not always possible due to the vagaries of weather and lack of control over your neighbor’s decisions. So we face financial loss of a high value product line and loss of diversity in our production system. Thirty years of accumulated knowledge all of a sudden becomes much less valuable.

So how can our experience spur this committee’s thinking, particularly about ways that USDA leadership can mitigate conflict between GMO and non-GMO production?

First, for seed production, are there models of preserving GMO free zones, i) on public lands, ii) through policy changes to zoning laws (especially in urbanized areas), or iii) through private cooperation in land preservation?

Second, how do you compensate a GMO-free seed producer if only one crop is contaminated, but thirty years of reputation are called into question, affecting all seed crop sales?

Third, producers want choices in the seed germplasm in order to suit their production systems and regional differences. Producers still desire public varieties proven in land grant university trials. Having a robust array of

non-GMO and GMO seed options could lead to less reliance on a single technology or source of germplasm, improving the security of our food supply and perhaps leading to easier co-existence. What can USDA do to give new priority to public plant and animal breeding, including training of the next generation of breeders?

Fourth, producers need accurate and understandable information about GMO content in products and processes. If we are considering compensation for GMO contamination, do we really know the source and how it was introduced? How do non-GMO producers take on the responsibility to avoid possible contamination? What products actually contain GMOs? It is virtually impossible for the producer to know from the label, for example, whether vaccines or seed inoculants contain GMOs or were produced with a GMO derived process. What can USDA do, in cooperation with industry and other agencies, to maintain a database of GMO products and processes used in agricultural and food production?

Finally, on a separate point, can a class of GMO-free producers seek compensation for system-wide damages? For example, organic farmers apply Bt for pest control. Bt is a naturally occurring bacteria that can inhibit insect feeding. Many GMO corn varieties contain Bt. Wide spread and continual plantings of Bt corn are very likely to lead to resistant pests. If organic farmers find they are losing the effectiveness of their Bt formulations and suffering yield loss, should organic farmers of certain commodities be compensated as a class?

I appreciate the difficult challenges this committee faces. In an ideal world, my goal would be to emphasize successful strategies for co-existence and minimize the need for compensation.