

W O R C

Western Organization of Resource Councils

January 24, 2005

Regulatory Analysis and Development, PPD
APHIS, Station 3C71
4700 River Road – Unit 118
Riverdale, MD 20737
<http://www.regulations@aphis.usda.gov>

Re: Comments – Monsanto Roundup Ready Alfalfa
Docket #04-085-1

To Whom It May Concern:

WORC (Western Organization of Resource Councils) appreciates the opportunity to comment on Monsanto's petition for deregulation of herbicide tolerant alfalfa and USDA's accompanying environmental analysis in the docket referenced above.

APHIS should prepare an Environmental Impact Statement on its decision whether to deregulate Monsanto's Roundup Ready alfalfa. The EIS should analyze the potential economic impacts of commercial release of the crop on U.S. alfalfa producers and livestock producers. APHIS should not deregulate these alfalfa events until it has prepared a draft EIS, provided an opportunity for public comment, and responded to comments in a final EIS.

WORC and other organizations previously requested that APHIS prepare an environmental impact statement on the proposed deregulation of Roundup Ready wheat. In our petition¹, we noted the inseparability of the potential economic impacts of deregulation on farmers and the impacts to the human environment. The potential economic and environmental impacts of releasing Roundup Ready alfalfa are similarly connected. Nearly 80 million tons of alfalfa is grown each year on 22 million acres in the U.S., according to USDA statistics. Nearly 90 million tons more is grown and harvested in mixed hay production on 40 million more acres. Feral and volunteer alfalfa is ubiquitous in the West. The potential cost of any unintended adverse agronomic, environmental or economic impacts of release of Roundup Ready alfalfa are large, and are largely unexamined in APHIS' EA.

The EA's only discussion of economic impacts is limited to analysis of Roundup Ready alfalfa and organic alfalfa production, and is deficient. First, it assumes that the responsibility for preventing contamination of organic production falls on the organic producer, rather than on the manufacturer of this alfalfa variety or farmers who grow it. Second, it fails to evaluate whether and to what extent segregation of genetically modified alfalfa from conventional alfalfa is possible. APHIS failed to evaluate, require or describe steps that Monsanto or those who buy and

¹ See *Petition Seeking an Environmental Impact Statement Concerning the Deregulation of Genetically Engineered Wheat Varieties*.

plant its Roundup Ready alfalfa seed could take to minimize or eliminate contamination of neighboring crops or to limit the spread of volunteers. Third, the EA assumes that the only potential problem for organic producers is whether and how they could continue to be certified as organic. APHIS ignores the separate and distinct question, whether alfalfa contaminated with genes from Monsanto's alfalfa could be *marketed* as organic production.²

APHIS has not considered impacts on any agricultural producers other than organic alfalfa seed or sprout producers. Sectors of the agriculture and food industry that could be adversely affected by the introduction and spread of Roundup Ready alfalfa include organic meat and livestock producers; producers of 'natural' beef, lamb, and other meat and livestock marketed with source-verification claims related to feed; and conventional and organic honey producers.

The EA fails to analyze the potential acceleration in the development of Roundup resistant weeds. Widespread adoption of Roundup Ready technology in corn and soybeans has led to increasing problems with Roundup-resistance. Widespread planting of Roundup Ready alfalfa will worsen this problem, especially where alfalfa is used in rotation with other Roundup Ready crops. Increasing Roundup resistance will lead to use of herbicides with relatively greater environmental impacts, and to increased costs for both adapting and non-adapting farmers.

APHIS should prepare an environmental impact statement that considers the potential environmental and economic costs of an increase in Roundup-resistant weeds. The EIS should examine whether, how, and at what cost Roundup Ready alfalfa can be kept separate from conventional, organic, and other alfalfas and hays containing alfalfa. The EIS should analyze the economic costs of contamination to producers of organic, natural, and conventional alfalfa seed, grass, hay, honey, livestock, meat, milk, and other foods.

We note that APHIS is preparing an EIS on Roundup Ready bentgrass, in part because of its potential to spread to public lands and to rights of way, where it could be prohibitively expensive or impossible to eradicate. Roundup Ready alfalfa, similarly, may spread by crossing with feral alfalfa, through the spread of volunteer plants, through wind and water erosion, and by the transport, feeding and digestion of feed. Just as an EIS on bentgrass was warranted, we believe a APHIS should prepare a comprehensive EIS on Roundup Ready alfalfa.

Once again, thank-you for the opportunity to comment.

Sincerely,

John Smillie
Program Director
Western Organization of Resource Councils

² Some or all buyers of organic alfalfa may choose to require testing, may discount any organic alfalfa with transgenic content, or may choose to buy from sources that can be certified as completely GM-free. Any of these economic choices would be costly to organic alfalfa producers, even if they were able to maintain their status as certified organic producers as APHIS presumes in the EA.