



October 8, 2025

Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP

Submitted via [Regulations.gov](https://www.regulations.gov).

RE: Docket #AMS-NOP-25-0034

NOSB Materials Subcommittee Discussion on Induced Mutagenesis

Dear NOSB Members:

Thank you for the opportunity to provide comments on the Fall 2025 Materials Subcommittee Discussion Document on Induced Mutagenesis. MOSA certifies over 1,754 organic operations throughout the United States, including approximately 638 livestock operations, 1,326 crop operations, and 362 handling operations. The vast majority of MOSA certified operations use seed and many could potentially be affected by a change in the allowance of seed varieties produced through induced mutagenesis.

While this discussion document contains many important considerations we would like to focus on the potential impacts of adopting an interpretation of induced mutagenesis that would alter the seed varieties that our certified operations currently have access to. Specifically, we need more concrete information regarding how stakeholders will be expected to identify seed varieties produced through induced mutagenesis in order to more fully assess the impacts of declaring induced mutagenesis an excluded method. There are simply too many practical unknowns in order to consider whether induced mutagenesis should be considered an allowed or prohibited method in the abstract. As the materials subcommittee appropriately notes, "it is difficult to see how farmers and certifiers could readily and accurately determine allowed varieties if IM is an excluded method, because there are no labeling requirements to identify use of IM in seed." Without a clear understanding of how many varieties of seed currently in use by our clients would be affected, and without an ongoing way for MOSA and our clients to identify these varieties, it is impossible for us to fully assess the impact of the various proposals in this discussion document. Additionally, we would note that there are supply chain considerations that may further complicate the identification of prohibited varieties. Seed may pass through various entities (distributors and/or retailers) on its way to a farmer who ultimately plants that seed in an organic field. Absent the above mentioned label, it is hard to see how varieties will be consistently identified as having been produced through induced mutagenesis.

Given the very real difficulty of identifying affected seed varieties, we hope that additional attention will be devoted to solving some of these practical considerations before declaring induced mutagenesis an excluded method. In particular, the discussion document notes, "It

would be challenging to maintain seed lists, and it is not clear who else could host, maintain, or pay for such a list.” Perhaps continued work on the topic of induced mutagenesis could start by solving some of these considerations. A list of affected varieties would allow MOSA to better assess the impact of this decision and furthermore, this list would be central to any future enforcement efforts if induced mutagenesis is determined to be an excluded method.

On the issue of excluded and prohibited methods more generally, we will also note that understanding all forms of induced mutagenesis to be prohibited in seed production will directly contradict with the current understanding of induced mutagenesis which only considers this an excluded and prohibited method when it involves in vitro nucleic acid techniques. Having two different interpretations regarding what types of induced mutagenesis are prohibited will be a source of confusion among stakeholders. And, if the broader definition of prohibited forms of induced mutagenesis were ever considered to apply to areas of organic production outside of seed production this would require us to collect updated documentation for a *huge* number of ingredients and/or inputs in use by our clients. Needless to say, this would be a daunting and time consuming task to undertake, and one that could potentially impact the status of products that organic operations have relied on for many years.

In conclusion, we would like to thank the NOSB for your continued work on this challenging and impactful issue. We look forward to a continued discussion that balances the practical needs of organic operations with the desire to keep excluded and prohibited methods out of the organic industry.

Respectfully submitted,

The MOSA Certification Team