

Going GMO-Free: A Toolkit for Grocers

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Introduction

In the spring of 2013, OCA asked consumers to nominate grocers who are doing a great job of protecting their customers’ health by saying no to GMOs (genetically modified organisms). From those nominations, we chose 12 overall winners of our [Right to Know Grocers Contest](http://oca-orca.org/). <http://oca-orca.org/> We call them the “Diligent Dozen.”

The contest proved to be a great way to single out grocers across the country who are doing a heroic job of educating customers about GMOs, providing truthful labels on products containing GMOs, and working with manufacturers to get GMOs out of popular consumer products, including food, supplements and cosmetics.

But the Right to Know Grocers Contest also proved to be a learning experience for us. From our interviews with more than 50 store staff, owners and managers, we learned what motivates them to educate consumers and provide non-GMO alternatives. We also learned about the challenges they face, and the strategies they’ve developed, in their quest to rid their shelves of foods containing GMOs.

It’s estimated that between 70 -80 percent of all processed foods contain GMOs. GMO ingredients are present in dozens of additives and flavorings, many of which do not include the names of the genetically engineered crops they are derived from. That leaves it up to our grocers to try to pry this information out of their suppliers. And that, they told us, can be challenging.

But the grocers we interviewed also pointed to many positive signs that the tide is turning, in favor of their customers who want GMO-free products.

Products that are non-GMO and certified organic represent the fastest growing (13 percent-per-year) segment of the food industry. And while we may have lost the GMO labeling battles in California (2012) and Washington State (2013), the GMO labeling movement scored a major victory when the nation’s largest organic foods retailer, Whole Foods Market, announced that by 2018, its stores will label all products that may contain GMO ingredients, including livestock feed. The move by Whole Foods has motivated many manufacturers to get their products verified as GMO-free, primarily through the Non-GMO Project.

More and more grocers are taking aggressive steps to remove GMO products from their shelves. And they're telling suppliers they won't purchase any new products that may contain GMOs.

Berkshire Co-Op General Manager Art Ames, who has teamed up with more than a dozen co-ops to reject new products likely to contain GMOs, laid out his cooperative non-GMO strategy in "[Building the GMO Labeling Campaign](http://www.cooperativegrocer.coop/articles/2013-03-11/building-gmo-labeling-campaign)": <http://www.cooperativegrocer.coop/articles/2013-03-11/building-gmo-labeling-campaign>

"It behooves us to continue to look at other ways that we can effect change so that it is in the manufacturers' best financial interest to eliminate GMOs. In fact, it needs to be a great enough reward to counter-balance Monsanto's efforts to the contrary."

Every step taken by a grocer to go GMO-free is another step toward replacing sales of GMO products with organic products, or at least products for which manufacturers secure non-GMO ingredients. Each GMO-free action sends a clear message to manufacturers and natural foods distributors that foods and non-food products containing GMOs are not welcome in these retailers' stores.

We've compiled some of the best policies, strategies and advice from many of the grocers we interviewed. We share them here in the hope they will inspire other retailers to reject GMO products, and ultimately push manufacturers to eliminate GMOs from all of their products.

Part I: Educating staff and customers

I-A. GMO Basics

Transitioning to GMO-free is an ongoing process. Before you even get started, you'll need to educate store staff so they can fully participate. And you'll need to educate customers if you're going to stop carrying some of their favorite brands because they violate your new GMO-free policy.

Here's some basic information to share with staff and customers about what GMOs are, and why you are labeling and/or removing products that contain them. (Source: [The Organic & Non-GMO Report](http://www.non-gmoreport.com/)) <http://www.non-gmoreport.com/>

- [What are genetically modified foods?](http://www.non-gmoreport.com/whatisnon-gmo.php) <http://www.non-gmoreport.com/whatisnon-gmo.php>

In genetic modification (or engineering) of food plants, scientists remove one or more genes from the DNA of another organism, such as a bacterium, virus, or animal, and "recombine" them into the DNA of the plant they want to alter. By adding these new genes, genetic engineers hope the plant will express the traits associated with the genes. For example, genetic engineers have transferred genes from a bacterium known as *Bacillus thuringiensis* or Bt into the DNA of corn. Bt genes express a protein that kills insects, and transferring the genes allows the corn to produce its own pesticide.

- [Genetic modification/engineering is a potentially dangerous technology](http://www.non-gmoreport.com/articles/may09/scientist_concern_gm_food_safety.php) http://www.non-gmoreport.com/articles/may09/scientist_concern_gm_food_safety.php

One of the main problems with genetic engineering is that the process of inserting genes into the DNA of a food plant is random; scientists have no idea where the genes go. This can disrupt the functioning of other genes and create novel proteins that have never been in the food supply and could create toxins and allergens in foods.

- [Genetic modification is a radical technology](http://www.non-gmoreport.com/articles/nov09/scientists_criticizing_gm_foods.php) http://www.non-gmoreport.com/articles/nov09/scientists_criticizing_gm_foods.php

Supporters of genetic modification say that the technology is simply an extension of traditional plant breeding. The reality is that genetic engineering is radically different. Traditional plant breeders work with plants of the same or related species to create new plant varieties. Genetic engineers break down nature's genetic barriers by allowing transfers of genes from bacteria, viruses, and even animals—with unforeseen consequences.

- [Genetic modification is based on an obsolete scientific theory](http://www.non-gmoreport.com/articles/aug07/genetic_engineering.php) http://www.non-gmoreport.com/articles/aug07/genetic_engineering.php

Genetic modification is based on a theory called the Central Dogma, which asserts that one gene will express one protein. However, scientists working with the United States National Human Genome Research Institute discovered that this wasn't true, that genes operate in a complex network in ways that are not fully understood. This finding undermines the entire basis for genetic engineering.

- What genetically modified crops are currently grown?
- The majority of corn, soybeans, cotton, canola, sugar beets grown in the United States are GM. Fifty percent of papaya grown in Hawaii is GM. Small amounts of yellow "crook neck" and zucchini squash are also GM.

I-B. Finer Points: The Difference between Open Pollinated Seeds, Hybrids and GMOs

Biotech companies do a great job of misleading consumers about the difference between a genetically engineered seed or crop, and hybrid crops and seeds created either through open pollination or intentional cross-breeding. Here are some great resources to share with consumers who want to know the difference between a genetically engineered or hybrid seed or crop.

- *The Difference between Open Pollinated Seeds, Hybrids and GMOs*, Small Footprint Family

<http://www.smallfootprintfamily.com/hybrid-seeds-vs-gmos>

- *What's the Difference Between Genetically Modified, Heirloom, Hybrid, Non-Hybrid, and Open Pollinated Seeds?*, Urban, Organic Gardener

<http://www.urbanorganicgardener.com/2012/03/whats-the-difference-between-genetically-modified-heirloom-hybrid-non-hybrid-and-open-pollinated-seeds/>

- *Hybrid Seeds vs. GMOs*, Mother Earth News

<http://www.motherearthnews.com/real-food/hybrid-seeds-vs-gmos-zb0z1301zsr.aspx>

Part II: Auditing Store Inventory

Once you get staff up to speed and customers on board, it's time to audit your inventory. The first step in going GMO-free is to identify which products in your store definitely contain GMOs, and which ones are likely to contain GMOs, based on the fact that 80 – 90 percent of certain ingredients, such as soy, corn, cotton, canola and beets, are genetically engineered. Retailers tell us that this process can take anywhere from three months to two years. Some grocers said they start with departments least likely to contain GMO ingredients and then proceed to the more difficult products, such as nutritional supplements, body care products, gluten-free products and cereals.

II-A. Ruling out GMO-contaminated products by USDA Organic and Non-GMO Project Labels

The easiest way to identify GMO-free products is to look for the USDA 100% certified organic or the Non-GMO Project verification labels.

- **USDA Organic Label**

Buying 100% Organic, Certified Organic, and USDA Organic-labeled products is the easiest way to identify and avoid genetically modified ingredients. There are several classifications under the USDA organic label:

1. 100% Organic: Must contain 100 percent organically produced ingredients (excluding water and salt). This is the only label that certifies a completely organic product and completely GMO-free ingredients.
2. Certified Organic / USDA Organic: At least 95 percent of content is organic by weight (excluding water and salt). The <5% remaining ingredients must consist of approved substances on the USDA's National List. *GMOs are not on this list, (see clarifying language below)
<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5090396> so USDA Organic products are also *usually* GMO-free. For verification, consult the following sources:

The USDA's National Organic Program [overview page](#)

<http://www.ams.usda.gov/AMSV1.0/ams.fetchTemplateData.do?template=TemplateA&navID=NationalOrganicProgram&leftNav=NationalOrganicProgram&page=NOPNationalOrganicProgramHome&acct=AMSPW>

The USDA's National [List of Allowed and Prohibited Substances](#) <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=9874504b6f1025eb0e6b67cadf9d3b40&rgn=div6&view=text&node=7.3.1.1.9.32.7&idno=7>

The USDA's [Organic 101 blog](#) <http://blogs.usda.gov/2013/05/17/organic-101-can-gmos-be-used-in-organic-products/>

A 2011 USDA [policy memo](#) <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5090396> in response to confusion over GMOs in organics

The National Organic Standards Board Policy and Procedures Manual

<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELDEV3013893%20-%20page=48>

Current USDA regulations allow food products that contain 95%-100% certified organic ingredients to use the USDA Organic seal. These regulations:

- a. Prohibit the use of chemical fertilizers, various synthetic substances, irradiation, sewage sludge, or genetically modified organisms (GMOs) in organic production.
- b. Prohibit antibiotic and synthetic hormone use in organic meat and poultry.
- c. Require 100% organic feed for organic livestock.

Note: Genetic engineering is an "excluded method" in organic farming and processing, according to the National Organic Program (NOP). The NOP states that when the product is labeled "100% organic," "organic," or just "made with organic ingredients," then even the non-organic ingredients cannot be produced from GMOs. For example, products labeled as "made with organic ingredients" only require 70% of the ingredients to be organic, but 100% must be non-GMO. (From The Non-GMO Project).

- **Non-GMO Project Label**

The Non-GMO Project started in Berkeley, at The Natural Grocery Co., which is a small neighborhood natural grocery store. In 2003, in response to letters from customers who were concerned about a GM soy lecithin that the store was carrying, a group of employees initiated the "People Want to Know Campaign." This effort rallied 161 grocery stores and co-ops throughout the United States in a letter-writing campaign to manufacturers of natural food products and supplements in the U.S. The goal was to discover the GMO status of products, so that the stores' consumers could be offered an informed choice. The results of this campaign were mixed, with a central problem being the lack of a consistent, industry-wide standard for what non-GMO was.

II-B. Ruling out GMO-contaminated products by ingredients

Two of the grocers we talked to—Berkshire Organics <http://oca-orca.org/store/berkshire-organics-market-deli-dalton-ma/> and North Coast Co-Ops—provided the lists they use as a guideline for auditing their products.

- **Berkshire Organics: Ingredients Watch**

GMO Crops: These ingredients, if not specifically labeled "Certified Organic" or "Non-GMO" are almost assuredly genetically modified:

Soy (Possible Soy Derivatives: bulking agent, carob, emulsifier, Glutamic Acid, Glycine, guar gum, gum Arabic, hydrolyzed vegetable protein (HVP), lecithin, natural flavors, Phospholipids, protein, protein extender, stabilizer, starch, textured vegetable protein (TVP), thickener, Tocopherols, vegetable broth, vegetable gum, vegetable starch)

Corn (Possible Corn Derivatives): Acetic acid, Alcohol - Found in extracts (like vanilla extract), Alpha tocopherol, Baking powder (usually contains corn starch), Calcium citrate, Calcium fumarate, Calcium gluconate, Calcium lactate, Calcium magnesium acetate (CMA), Calcium stearate, Calcium stearoyl lactylate, Caramel and caramel color, Carbonmethylcellulose sodium, Cellulose in any form, Cetearyl glucoside, Choline chloride, Citric acid, Citrus cloud emulsion (CCS), Coco glycerides (cocoglycerides), Crosscarmellose sodium, DATUM (a dough conditioner), Decyl glucoside, Decyl polyglucose, Dextrin, Dextrose, d-Gluconic acid, Distilled white vinegar, Drying agent, ethanoic acid - also known as Acetic acid, Erythorbic acid , Erythritol, Ethanol, Ethocel 20, Ethylcellulose, Ethylene, Ethyl acetate, Ethyl alcohol, Ethyl lactate, Ethyl maltol, Fibersol-2, Flavorings, Food starch, Fructose, Fumaric acid, Germ/germ meal, Gluconate, Gluconic acid, Glucono delta-lactone, Gluconolactone, Glucosamine, Glucose in any form, Glutamate, Gluten, Glycerides, Glycerin, Glycerol, Golden syrup, Hydrolyzed vegetable protein (HVP), (HPMCP), Inositol, Invert syrup or sugar, Lactate, Lactic acid, Lauryl glucoside, Lecithin, Linoleic acid, Lysine, Magnesium fumarate, Malic acid, Malonic acid, Malt, Maltitol, Maltodextrin, Maltol, Maltose, Mannitol, Methyl gluceth, MSG, Natural flavorings, Polylactic acid (PLA), Polysorbates, Polyvinyl acetate, Potassium compounds, Propionic acid, Propylene compounds, Semolina (unless from wheat), Simethicone, Sodium compounds, Sorbic acid, Sorbitan, Sorbitol, Starch, Stearic acid, Stearoyls, Sucrose, Sugar, Threonine, Tocopherol (vitamin E), Treacle, Triethyl citrate, Vanilla (the alcohol can be corn alcohol), Vinegar, distilled white, Vitamins, Xanthan gum, Xylitol, Zein)

Additional GMO Crops: These ingredients, if not specifically labeled “Certified Organic” or “Non-GMO” are almost assuredly GMO Cottonseed (used in vegetable cooking oils), canola (canola oil), sugar from sugar beets, hawaiian papaya; some varieties of zucchini, crookneck squash

<http://oca-orca.org/wp-content/uploads/ingredients-watch-berkshire.pdf>

- **North Coast Co-Ops**

List of non-organic ingredients derived from crops at high risk for being GMO include:

Amino acids, artificial flavoring, ascorbic acid, aspartame, citric acid, corn starch, ethanol, high-fructose corn syrup, hydrolyzed vegetable protein, lactic acid, maltodextrin, molasses, monosodium glutamate, natural flavoring, natural spices, sodium ascorbate, sodium citrate, soy lecithin, speices, texturized vegetable protein TVP), vitamin C, vitamin capsules, xantham gum, yeast products

*Animals at high risk for being genetically engineered include, but are not limited to:

Salmon (pending legislation)

** This policy does not apply to animals that are fed GMO feed, only animals that are genetically engineered.*

Non-organic crops at high risk for being GMO include but are not limited to:

Canola (rapeseed), corn, cotton, soy, sugar beets, papaya (from Hawaii), zucchini, yellow summer squash, apples (pending USDA approval)

<http://oca-orca.org/wp-content/uploads/ingredients-watch-north-coast.pdf>

II-C. Retailer Feedback: Identifying and eliminating the “Traitor Brands”

Some of the grocers nominated for the Right to Know distinction added another step to their auditing process: eliminating brands whose parent companies opposed GMO labeling initiatives in California (Proposition 37) and Washington State (I-522). We refer to these brands as the “Traitor Brands,”

http://www.organicconsumers.org/articles/article_26621.cfm listed here. <http://organicconsumers.org/label/gmo-boycott-poster.pdf>

Here are some comments and suggestions from retailers who are discontinuing brands owned by companies that do not support consumers’ right to know about GMOs.

Example #1: Downtown Farm Stand Muncie, IN We don’t carry organic products that don’t meet our values. That includes discontinuing brands owned by parent companies that contributed to defeat California’s Proposition 37.

Example #2: Gary Null’s Uptown Whole Foods, New York, NY We don’t buy organic products from companies owned by agribusiness giants. Our staff is continually searching for high integrity small companies to replace the products of organic companies as they are bought up by multinational brands.

Example #3. Chautauqua Natural Foods, Garberville, CA We carefully screen all products we bring into the store and select only those that meet our health and wellness quality standards, with organic and non-GMO being the store’s primary purchasing priorities. We also scrutinize products for good corporate citizenship. As giant multi-brand corporations have increasingly purchased independent providers, often their actions and investments do not support the store’s organic principles. When we find this to be true, we remove those products.

Example #4: Neighbors Market, Vancouver, WA We carry very few GMO products. We’ve stopped carrying The store Back to Nature, Knudsen’s and other brands whose parent companies funded opposition to Prop 37, California’s GMO labeling initiative.

Example #5: Sundance Natural Foods, Eugene, OR It’s our policy to investigate the business practices of parent companies. If a line of organics is owned by a multinational or national brand identified as a “traitor brand,” we do a practices and policy analysis of the subsidiary company in relation to the practices of the parent company. If we feel that the parent company exerts undue influence on the practices of the organic line, we phase out that brand. Some companies, like Green & Black Organic chocolates, maintain enough independence in their promotion of organics, fair trade and labor practices that we choose to endorse them in an attempt to pressure the parent company to change their overall practices. Sometimes a company is simply a member of the larger corporation’s portfolio. It is a very nuanced approach to brand selection that attempts to mediate our larger concerns and appreciate the big picture issues concerning national and global food issues.

Example #6: Choices Natural Market, Venice, FL We have eliminated Horizon, Silk, and Santa Cruz from our inventory in an effort to boycott the manufacturers who have donated money to fight consumers' right to know. We have a little ways to go with this before we eliminate all of the brands who are fighting the labeling efforts, but we are doing our best to balance our business with our morals and beliefs, and are educating our customers as to our manufacturers' business practices. We're working to get customers to switch to brands that support our right to know and trying to educate every customer who comes through our doors.

Example #7: Sunseed Food Co-Op, Cape Canaveral, FL We're actively removing products (including organic) of numerous brands owned by multinational parent companies and replacing them with brands owned by smaller companies that the store prefers to support.

Example #8: Goodwin's Organic Foods & Drinks, Riverside, CA

We're always looking for small organic companies to support. As multinational corporations purchase organic businesses, we discontinue those brands.

Example #9: Natural Grocery Company, El Cerrito & Berkeley, CA

We've discontinued many of the brands owned by multinational corporations and are considering a future policy that would require removing all non-organic foods from the store.

II-D. Retailer Feedback: Auditing suggestions and comments

We asked retailers to tell us about their individual experiences around conducting audits. Here are some of their comments and suggestions.

Example #1: Sundance Natural Foods, Eugene Oregon

Three years ago Sundance completed its first audit of GMO products in our store. We continued many products as a result. But we also discovered a few "wolves in sheep's clothing." This is an issue we take very seriously, not just as a retailer attempting to provide the cleanest, healthiest, most sustainable and responsible food we can to our clients, but also as citizens who demand the right to know what is in our food. Sundance practices and promotes the ethos of "Gatekeeping," believing that we hold a moral and practical duty to educate our community about all issues surrounding the responsible production and sustenance of local, national and global food markets and agriculture, and to protect our food supply from those who would compromise and destroy it for profit.

Example #2: Berkshire Organics, Dalton, MA

Not only do we not bring in new products that may have GMO ingredients, but we have gone through our entire market and found better, cleaner alternatives for many items that have conventional dirty-dozen and/or GMO ingredients. We've eliminated many popular items because we were able to find organic alternatives. We also discontinued many organic brands owned by large corporations such as Knudsen, Santa Cruz, Muir Glen and Cascadian Farms, to name a few. We have some large organic corporate brands still on our shelves because we haven't been able to find a smaller, independent company that offers an alternative. As soon as one does become available, we mark the large corporate brand on sale to move it out and bring in the better alternative.

Example #3: Central: Sunspot Market, Kokomo, IN

We did a store audit four years ago and removed any products that contained GMOs. Supplements containing suspect GMO ingredients are discontinued. Store staff continually monitor potential GMO ingredients by department to make sure suspect products are not stocked by the store.

Example #4: Jimbo's...Naturally! San Diego, CA

We are weeding out products that were grandfathered in, and replacing them, department by department. We expect to complete this process in 6-12 months. Sometimes we immediately drop products, or continue them only until we find a readily available replacement.

Example #5: People's Food Co-Op Ann Arbor, MI Over the past two years, we've audited the products in our store, and discontinued many that contained suspect ingredients. Once in a while, a staff member will still come across a product that contains unlabeled suspect ingredients—for example, Newman's Own salad dressing contains corn oil, which may be GMO. When we discover a product like this, we remove it.

Example #6: Briar Patch Co-Op, Grass Valley, CA We are performing a full grocery audit, going through store shelves one 4-foot section at a time and removing products suspected of containing GMOs. We tell vendors and manufacturers selling products that contain suspect ingredients that we will discontinue their products unless they replace the ingredients. This sometimes involves negotiating replacement deadlines.

Part III: Retailer Feedback: After the Audit—Labeling GMOs in Retail Stores

Once audits are complete, some retailers choose to remove or phase out all GMO products. Others have chosen to continue to sell some GMO products, but clearly label them so consumers can choose to avoid them if they prefer. Here are a few comments and suggestions from retailers who label GMOs in their stores.

Example #1: Terra Organica, Bellingham, WA

As a result of our efforts to label products with likely GMO ingredients, we have seen some unintended positive consequences. One of them is that it has persuaded about 15-20 of our suppliers manufacturers to expedite their non-GMO certification as a direct result of our labeling. This is largely a result of social media. When we, or one of our customers, posts a photo of a product with our GMO Alert tags the photos are shared—and that creates a headache for the manufacturer. The reason for this is simple: social media.

For example, the first time we posted a photo of our GMO Alert tag on Facebook, it went viral and was viewed by over 200,000 people. We deleted the photo at the request of the product's manufacturer, because we are not trying to punish companies, just inform our customers.

Several manufacturers that ship direct have pulled their products from our store because of the labeling. They don't want their products to be associated with GMOs on our shelves or in social media. However, almost all the products we have labeled come to us via a distributor so the manufacturer can't refuse to sell to us unless they pull the product out of distribution.

Example #2: Natural Grocery Company, El Cerrito and Berkeley, CA

We began our process of flagging items at risk of containing GMOs after the defeat of Prop 37. We marked items that are verified non-GMO with green shelf tags and highlighted items at risk for GMOs with red shelf tags. We explained the colored shelf tags with notes at each register and around the store. Along with an explanation of our shelf tags, we printed the contact information of several manufacturers, so that our customers could contact companies to encourage them to switch to non-GMO ingredients. We are proud to make this information available to our customers, but unfortunately we have not yet seen a significant change in the buying habits of our customers. One shortcoming we have identified is that customers must learn our color-coding system. We want to improve our signage to make it more clear whether an item may contain GMOs. We also highlight Non-GMO items and producers throughout Non-GMO Month with promotions, sampling and educational materials on GMOs and producer practices.

Example #3: The Good Tern Co-Op, Rockland, ME We label products that may contain GMOs, but have been conditionally accepted. We notify customers about products that may contain GMOs via shelf signage, website/Facebook postings and/or access to folders documenting manufacturers' foods that may contain GMOs.

Example #4: People's Food Co-Op Ann Arbor, MI We use a color-coded system to label any products that we suspect may contain GMOs, including those from manufacturers we want to support. We also label foods that are potential allergens.

Example #5: Alfalfa's Market, Boulder, CO:

Alfalfa's carries only a handful of products that may contain GMOs, mainly grocery items that are unique and very popular with customers. We use handmade signs to notify customers these items may contain genetically engineered ingredients. The store also posts GMO product shelf tags.

Example #6: To Your Health Market, Merrill, WI We use shelf talkers to identify GMO products and other allergens.

Example #7: Terra Organica, Bellingham, WA We use homemade tags to identify products likely to contain GMOs. The tags include the product name, brand name and suspect ingredients.

Example #8: Chautauqua Natural Foods, Garberville, CA

We have several large signs in the store, informing customers about how GMO's are created, how to avoid them and the foods that have been modified. The sign also describes our GMO

Policy. We place non-GMO signs on non-organic products that are also non-GMO. We gave up the "may contain GMO's" signs last year because we eliminated those products.

Example #9: Cliff's Country Market, Caldwell, ID

After getting educated on the reality of GMOs in our food supply several, we decided to eliminate all the GMOs we could from our inventory and to label all of our products for their GMO status.

Much of what we sell are products we buy in bulk and repackage under our own label. Of these, products that don't contain ingredients that could be from a genetically engineered source we label as "Naturally Non-GMO."

For those products purchased in bulk that contain ingredients that could be genetically modified (corn, soy, sugar, oils, etc.), we contact our suppliers to verify that they supply only Non-GMO-sourced products, and then we label them with "Contains 100% Non-GMO Sourced Ingredients."

We have some bulk-purchased products for which we haven't yet found a suitable 100% Non-GMO source. We label them with a label that identifies the ingredients that could be GMO.

For products we buy from other manufacturers, we don't feel we have the right to put a GMO status label on their package, so we are in the process of putting a shelf tag on all of those products, similar to the labels we use on our in-store packaged products. We have eliminated most GMO-containing processed foods from our inventory, and are committed to having a label or shelf tag on everything we sell. This is an ongoing process that we started just a few months ago and have not fully completed. But letting our customers know the GMO status of what we sell is our most important commitment.

Part IV: Working with Manufacturers/Suppliers

IV-A. Retailer Feedback: Telling manufacturers 'No more GMOs'

How do you inform manufacturers and suppliers that you're no longer going to carry their products if they contain GMOs? Retailers shared their ideas and, in some cases, the statements they provide to manufacturers.

Example #1: Jimbo's...*Naturally!*, five stores in San Diego area

Statement to manufacturers: "We do not claim to be GMO-free, we are moving in that direction. Going forward, we will do our best to limit any products that contain GMOs. In that vein, we prohibit ingredients that are most likely to contain GMOs.

"Specifically, at this time and to the best of our ability, we will not accept any new items with non-organic corn, soy, canola, sugar beets, alfalfa, or Hawaiian papaya unless the Non-GMO Project certifies that item as GMO-free. This includes ingredients such as fructose that are produced using corn or soy. We strongly encourage any manufacturer that is making a non-GMO claim to verify that claim with the Non-GMO Project and to label their products accordingly.

"Furthermore, to the best of our ability, Jimbo's...*Naturally!* will not promote any item that contains an ingredient that is at risk for GMO contamination unless that product is certified organic (95% or more organic ingredients), verified as non-GMO by the Non-GMO Project, or the at-risk ingredient itself is certified organic."

Example #2: North Coast Co-op (Arcata and Eureka, CA)

Statement to manufacturers: "(Effective June 1, 2013) Due to the introduction of genetically modified crops into our food system, and the lack of mandatory labeling regulations, it has become difficult to know for certain if foods are truly free of Genetically Modified Organisms (GMOs). We recognize that our members are concerned about the potential negative health and environmental effects of GMOs. They expect to be able to find products that are free of GMOs at our stores and we are endeavoring to meet that expectation to the best of our ability. In addition, we feel we can strongly influence vendors and regulatory agencies to label GMOs if we band together with other co-ops.

"In order to influence the regulation of GMO labeling, we are no longer knowingly accepting NEW non-organic products that include GMO high-risk items in their ingredient list, unless they are:

- (1) verified by The Non-GMO Project
- (2) or can provide to us a detailed description of the measures they have taken to avoid GMO contamination. With the exception of WIC items
- (3) this new policy applies to all ingestible items

"In addition to basic purchasing, we will do the following to further pressure vendors to label GMO products:

- We will no longer promote products that are at high risk for containing GMOs on end caps or in stacks; this applies to all products, not just new products, and includes promotional programs such as Speed-to-Market.
- We will work to ensure that all Co-op private label products—not just new products—are free from ingredients that are at high risk for containing GMOs.
- We will work to ensure that all products—not just new products—used in our Bakery and Deli recipes are free from high risk-GMO ingredients.
- We will not include products that are at high risk for containing GMO ingredients in our Co-op Basics program; this applies to all products, not just new products.
- We will not carry products that are themselves, nor contain ingredients made from genetically engineered animals; this applies to all products, not just new products.

“We realize that in two stores with thousands of products, an ever-changing landscape in organic practices, and the introduction of new GMO products regularly, we will need to make our GMO policy a living document that changes over time with each new development. We intend to enlist the help of our membership to aid in identifying high-risk GMO ingredients in order to maintain educational materials for use in employee training and member education.

“At some point, if a vendor decides to voluntarily label their non-organic, non-Non-GMO Project verified product as containing GMOs, we will allow that product on our shelves. Our goal with this policy is to influence labeling; if vendors voluntarily label GMO ingredients, then we have met our objective of providing transparency for our shoppers. The Co-op strives to provide education and information allowing the customer to make an informed decision. The exception, however, is in our Prepared Food (deli and bakery) and Meat departments, in which we are working to ensure recipes are free from ingredients at high risk for containing GMOs, whether they are labeled GMO or not. At which time vendors begin to voluntarily label their ingredients as GMO, or a government mandate is set, we will reassess the need for this policy.”

<http://oca-orca.org/wp-content/uploads/ingredients-watch-north-coast.pdf>

Example #3: Central: Durango Natural Foods Co-op, Durango, CO

GMO Purchasing Policy:

- We will not bring any new items into the store that contain GMO ingredients.
- We will inform our customers by labeling all our non-GMO verified products and by posting this policy in the store, on our website and social media.
- We will encourage vendors and manufacturers we work with to source non-GMO ingredients and inform them of our policy on new items.
- Products we currently carry with GMO ingredients will be moved out of prime spots on the shelf. The quantity of them will be reduced according to sales numbers. Eventually these items will be phased out in favor of non-GMO products.

Example #4: Nature’s Food Patch , Clearwater, FL

Statement to manufacturers: “Nature’s Food Patch Is Committed To:

1. Promoting the sale of Organic Foods and/or Non-GMO foods. Signage is used to indicate Non- GMO Project Verified products making it easier for you, our customers to locate them.
2. Reducing the number of products that could potentially contain GMOs.
3. Limiting and controlling the introduction of any new products that may contain GMOs. The new products that we bring in must have:
 - a. Organic certification,
 - b. The Non-GMO Project Verified seal, or
 - c. Written certification from the manufacturer or producer that the product is GMO free
4. Encouraging all suppliers of existing products that may contain GMOs to strive to become GMO free and to seek Non-GMO Project Verification
5. Making our deli virtually GMO-free
6. Continually educating our team members and customers on the dangers of GMOs and on their right to know what is in their food.” Read more:

<http://www.livingnaturally.com/PDFDocs/5/51f6e926d2124692b44379d027358b46.PDF>

Example #5: Sundance Natural Foods, Eugene, OR (Statement to vendors): “No product that is known to contain GMOs will ever be introduced in our store as a new item. Products which are currently on our shelves and contain suspect ingredients are thoroughly evaluated, and to the best of our ability we pursue verification from manufacturers about the nature of their products, and we remove products unless verification of non-GMO status is obtainable. We have and always will support and give preference to Organics.”

Example #6: MOM’s Organic Market, Baltimore, MD & Washington, DC Area

Statement to vendors: “MOM’s Organic Market is dedicated to supporting organic agriculture. When we review new products, higher priority is given to items that are made with organic ingredients. When organic products are

not available, MOM's will give preference to products madewithout genetically modified organisms (GMO's). This especially applies to products thatcontain ingredients, sub-ingredients, or additives that are sourced or derived (wholly or inpart) from common high-risk GMO crops.

“At all times, efforts will be made to increase MOM's selection of organic and/or non-GMO products, especially during regularly scheduled category reviews. This may resultin non-organic items being discontinued in favor of certified organic or verified GMO-freeproducts.

Common high-risk GMO crops include: Beets (sugar), Soy, Cotton, Corn, Canola

Ingredients derived from common high-risk GMO crops include (but are not limited to): Amino Acids, Ascorbic Acid, Sodium Ascorbate, Vitamin C, Citric Acid, Sodium Citrate, Cellulose, Natural Flavorings, Corn Syrup, Hydrolyzed Vegetable Protein, Lactic Acid, Maltodextrins, Methylcellulose, Molasses, Textured Vegetable Protein (TVP), Xanthan Gum, Vitamins, Yeast Products.

Note: MOM's expects all GMO-free claims to be stated on packaging and verified by athird-party (such as The Non-GMO Project).”

<http://oca-orca.org/wp-content/uploads/moms-vendor-statement.pdf>

Example #7: Central: Green Grocer Chicago, IL and Dallas, TX

Green Grocer Standards and Expectations for Products

Statement to vendors: “At Green Grocer, we are committed to supporting and furthering a sustainable, organic and regionally based food system. We are constantly looking to improve the products that we carry and we continue to push our product selection to reflect our mission of local, organic and delicious foods. Although some foods are not available always locally grown/produced or organically produced, that will always be our ideal and we will continue to work with our vendor-partners to align their products more with our mission, not because it is only good for us personally but also good for all those who eat food (and well, that is all of us). We expect our potential vendors to approach us knowing about our mission. We would love to work with all small food producers but we need to make sure that they are using ingredients that align with our mission. This, at its most basic level, means no genetically modified ingredients (we will need written verification on any non-organic corn, soy or canola ingredients), no artificial preservatives, no careless ingredients (we want to know WHY you use a certain ingredient and we will hope you have a better reply than “it’s cheap”). If your product doesn’t currently fit in with our mission, we are always happy to partner with vendors to help them access better ingredients. That’s right, we take our own time to help you find better quality so that perhaps we can be a good fit! We also will sell vendors the ingredients they require at our cost (must pay with cash or check at time of pick up) so that they can get a wholesale price on an ingredient.

“We believe in thoughtful sourcing and we are most interested in working with vendors who feel the same way. If you believe you are making a yummy product but are not necessarily fitting into our guidelines yet, please let us know how we can help you. We feel that a world with less chemicals, less artificial ingredients, less pesticides, less genetically modified organisms and generally just higher quality food is good for all of us!” Cassie Green, Gary Stephens and the entire GG team.

<http://oca-orca.org/wp-content/uploads/green-grocer-standards.pdf>

IV-B. Retailer Feedback: Informed Buying: Requiring GMO-Free Documentation from Manufacturers

Many retailers have progressed to the point where they require documentation from manufacturers and suppliers to prove GMO-free status. Here are a few examples of stores that require documentation, and some samples of what they require.

Example #1: Berkshire Organics, Dalton, MA

Request for verification of GMO status: "Hello, We carry your products in our store but we and our customers are becoming increasingly concerned about genetically modified ingredients in the products we carry. It is very important to us that we provide the cleanest safest products possible to our growing customer base.

Example #2: Terra Organic, Bellingham, WA

Company statement: "Terra Organica has created a new standard requiring at least one of the following: 1) USDA organic certification; 2) third-party non-GMO certification by either the Non GMO Project or the National Food Certifiers (NFC); or 3) a signed Declaration of Non-GMO status from the manufacturer."

Example #3: Ocean Beach People's Organic Food Co-Op, San Diego, CA

We inform manufacturers that all products purchased by the co-op need to be either organic or have an affidavit certifying that products are GMO-free. We accept the substantiated claims of the manufacturer (either a written document or label designation) and any certification from the non-GMO project. Our GE policy states:

"Under current conditions no product can be guaranteed to be GE free. While organic growers cannot control random pollination, they do begin with non-GE seed. We believe planting organic seeds is the best practice for healthy people and a healthy planet. When soy, corn, or canola is a primary ingredient in a new product, it must be organic. Non-organic soy, corn, canola or sugar beets in any product must be certified as non-genetically engineered."

Example #4: Green PolkaDot Box, American Fork, UT Online Grocer

Our Vendor Acquisition Manager requires organic certification or GMO-free verification letters from manufacturers before purchasing products

Example #5: Berkshire Organics, Dalton, MA

We're not certain we can trust products that we're told are GMO-free, but that don't have the non-GMO project verification. For example, the Kind Bars have been an item we have not brought into our store, even though they say non-GMO on the wrapper. When you look them up on the Non-GMO Project website <http://www.nongmoproject.org/> you see that only their clusters are listed. The bars are not. When we met with a sales rep from the company he did not know much about GMOs. We explained our concerns about conventional soy lecithin and natural flavors being listed in almost every bar. He said they were in the process of getting them verified. But he never got back to us with proof or a certificate. So we remain uncertain about this item. We'd like to see some stricter policing somehow. OCA does a great job of calling companies out and doing undercover work so perhaps this is something they could assist with as well.

IV-C. Retailer Feedback: Working with Manufacturers to Remove GMO Ingredients

Many retailers are working closely with manufacturers to convince them to go GMO-free, and help them locate sources for non-GMO ingredients.

Example #1: Jimbo's...*Naturally!*, five stores in the San Diego area.

Our buyers have persuaded several manufacturers, including Endangered Species, Angie's Kettlecorn, Popcorn Indiana, Turtle Island (Tofurkey) and Sunfood Superfoods to switch out suspect ingredients for GMO-free ingredients, and whenever possible, organic ingredients. We believe in working cooperatively with manufacturers to go GMO-free. But we also let manufacturers know that we will eventually replace their products with GMO-free alternatives if they do not have a plan for removing GMO ingredients. Our buyers meet with manufacturers and brokers, who now understand our position and don't offer GMO foods. Our stance on GMOs has led several manufacturers to enroll in the Non-GMO Project in order to keep us as a customer.

Example #2: MOM's Organic Market, 10 stores in Washington, DC and Baltimore ME area.

Most of our success has been with local vendors. Ester's Granola, for example, was using canola oil in the granola. When we explained that we wouldn't accept it with the non-organic, GMO-risk canola they began testing coconut oil and have now transitioned the entire line into coconut oil. When they switched, we began to carry the brand. Our Regional Grocery Coordinator is currently working with a chip vendor to change from canola/corn oil to sunflower/safflower oil. It's still in the works. With larger companies it's been tougher to effect change. But by standing firm in demanding organic or third-party certification we are voting with our dollars.

Example #3: Berkshire Organics, Dalton, MA When we did an overhaul of all the items we carry, and looked at all the ingredient lists for every product, we realized we would need to contact many local food makers with our concerns about GMOs. Several of them were confused and did not know about GMOs. There were several, however, who did take action. One local granola maker from Bola Granola switched the canola oil she was using. Since then she has added other products to her line and is marketing them as non-GMO.

Example #4: Natural Grocery Company, El Cerrito and Berkeley, CA

We are often able to work with local vendors on replacing ingredients that do not meet our standards. Through the Non-GMO Project, we have also been able to advocate for the removal of GMOs with larger manufacturers. We helped fund the launch of The Non-GMO Project and served on the Board of Directors until earlier this year. When we come across ingredients that do not meet our GMO standards, we contact the producers to explain why we would like to, but cannot carry their products. For example, we worked with Natural Choice, a mid-sized local distributor, to improve ingredients in a new line of salads. They were able to make the changes within months and the salads are popular with our customers and staff."

Example #5: Good Tern Natural Co-op, Rockland, ME

We ask manufacturers who cannot verify that their products are GMO-free to use GMO-free ingredients and, whenever possible, to substitute organic ingredients. Products are discontinued if the manufacturer doesn't respond. The co-op prioritizes local and organic foods and will work with local suppliers to attain GMO-free status.

IV-D. Manufacturers and Distributors Saying No to GMOs

Some manufacturers and distributors are making it easier for retailers to go GMO-free. Here are a few that the retailers we interviewed told us about.

Example #1: Clif Bar & Company, Emeryville, CA

Company statement: "Clif Bar is committed to sourcing ingredients that are not genetically engineered in all of our products. We have stringent protocols for GMOs, which include requiring affidavits from ingredient suppliers demonstrating they can meet our non-GMO requirements.

"Many Clif ingredients are organic which by Certified Organic Standards in the U.S. means that ingredients are sourced from non-GMO. These ingredients are accompanied by an organic certification. Any conventional ingredient also is shipped to us with an affidavit to ensure the ingredient meets our non-GMO requirements. Read more: http://www.clifbar.com/food/did_you_know/

Example # 2: Lundberg Family Farms, Richvale, CA

Company statement: "Lundberg Family Farms recognizes the importance of a natural environment, purity of the foods we eat and sustainability in agriculture. We recognize the consumer's interest in knowing how their food was produced and what ingredients are present. Lundberg Family Farms' goal is to be able to market its rice in all countries worldwide in accordance with those countries' GMO acceptance levels. We will promote a non-GMO philosophy as a way of doing business.

"We proudly use non-GMO ingredients in our food. Just as the use of non-GMO ingredients has not raised the price of our foods, the addition of non-GMO labeling to our packaging has not, and will not, increase the cost of our products.

Lundberg Family Farms opposes the creation and propagation of genetically modified food and fiber for the following reasons:

- They may cause adverse health conditions in humans
- They may have adverse environmental and ecological impacts, as well as reduce the biodiversity of crop varieties
- They have the potential to cross over to conventional, non-modified types
- They are not generally accepted in world trade
- They have an adverse impact on organic agriculture
- They can cause a proliferation of chemical use, negatively affecting agricultural sustainability of soils and water
- They create dependence on chemical suppliers
- They create dependence on proprietary seed corporations
- Oversight of development is ineffective and once released, GMO's may be uncontrollable
- There are not clear liability protections for farmers whose crops become contaminated with GMOs Read more: <http://www.lundberg.com/Commitment/Gmos.aspx>

Example # 3: Bob's Red Mill, Milwaukie, OR

Company statement: by Cassidy Stockton February 27th, 2013 in [Featured Articles](#), [Health](#), [Whole Grains 101](#):
"With all of the attention swirling around genetically modified organisms (GMOs), we've been getting a heap of questions about our products and GMOs. Rest assured, at Bob's Red Mill, we are committed to providing identity-preserved products exclusively.

"Identity preserved' means that the seeds that were planted to grow our crops came from a non-GMO source. We work constantly with our farmers and suppliers to ensure that the ingredients we procure are non-GMO. In fact, each of our corn, rice, soy and flax suppliers is required to sign a statement which affirms that their ingredients come from non-GMO sources.

"Planting identity preserved seed is just the first step in ensuring that products are non-GMO. That is why we have recently procured state-of-the-art testing equipment that allows us to begin our own in-house testing of our products. Our goal is to implement a testing protocol that is acute and prolific.

"We hope you share our enthusiasm for keeping natural foods natural. If you have any questions, please leave them in the comments section."

Read more: <http://blog.bobsredmill.com/featured-articles/our-policy-regarding-gmos/>

Example #4: Azure Standard, Dufur, OR, that is saying no to GMOs. Here's the company statement:

"We do not knowingly purchase any new items that have GMO's in them. We are diligent in requiring non-GMO statements for all items that are not certified organic. The challenge we face is in the 9000 existing products we carry and supply to our customers. We are going through them piece by piece. When we come across products that contain GMO's, we either work with the vendors to help correct that -asking them to change their ingredients to get rid of the GMO's, or we replace the items with clean products. In some cases, we can and do simply discontinue items. This is a large process- and one that is not static. Sometimes vendors switch their ingredients without making any changes to their labels or notifying us. So, without a lot of digging, one would never know the product went from using non-GMO to GMO. But, we do try very hard to stay on top of this, and always encourage customers to let us know when they have learned of this type of thing, or when they find a product we carry that has GMO's in general.

Read more: <http://www.azurestandard.com/blog/2013/1/31/gmo-statement/>

Part V: You Can Do It! Grocer Testimonials on Going GMO-Free

"Take the high road whenever you can. The trust you gain from your customers is invaluable. Be transparent about the problems we face and people will understand. I believe that people will go out of their way to shop for food from a store they can trust. And it's a great honor to have that trust. We need to constantly strive to deserve it."

Mark Squire, Owner, Good Earth Natural Foods, Fairfax, CA

"We were initially worried that we'd lose customers. But once the decision was made, we found that we were actually building additional customer loyalty. As it turns out, customers have been appreciative of our stance, which has actually led to an increase in sales."

Jimbo Someck, Owner, Jimbo's...Naturally!, five stores in the San Diego area.

"It's a daunting task! We've been able to eliminate non-organic potential GMOs when we have an organic alternative. For instance removing non-organic canola oil in favor of just carrying organic, and also regular milk yogurt. But by no means are we close to eliminating all, and we know of no grocery store in the country that can say any different. Still, overall customer response has been positive, and we see vendors trying to adjust to stay relevant."

Eva Jannotta, Marketing Manager, MOMs Organic Market

"There is a definite need for truth and transparency in our food system in this country. Small, independent businesses like ours can thrive because customers respond to retailers that they perceive as trustworthy. Many people realize that large corporations may not always have the best interest of the consumer in mind. Many times those corporations are driven by profit instead of doing what is best for the public."

Aleisha Gibbons, Owner, Berkshire Organics, Dalton, MA

"Yes, it takes a lot of effort, but it is worth it! That we all vote with our dollar and then our forks. If we put pressure on the manufacturer's to take GMOs out of their foods by saying that we discontinuing them until they do remove them. Make phone calls every day, emails, Facebook posts and to let our elected officials. Know how we want them to vote! Attend rallies, join garden clubs and talk to farmers!"

Joan Johnson, Owner, Sunspot Natural Market, Kokomo and West Lafayette, IN

Part VI. GMO-Free Resources

- **Non-GMO Project Verified Products**

<http://www.nongmoproject.org/find-non-gmo/search-participating-products/>

- **Online Directory of Suppliers of Non-GMO Products:** http://nongmosourcebook.com/non-gmosourcebook/us_suppliers.php?page=1

- **Organic and Non-GMO Report Non-GMO Sourcebook**

<http://www.nongmosourcebook.com/aboutnongmosourcebook.php>. *The Non-GMO Sourcebook* is the world's only "farm to fork" directory of non-genetically modified (non-GMO) food and agricultural products. With growing concerns about health and environmental risks of genetically modified (GM) foods, millions of people worldwide are demanding non-GMO food products. *The Non-GMO Sourcebook* serves this growing trend by providing the most comprehensive list—more than 750 companies—of suppliers of non-GMO products and related services. It lists sources for non-GMO seed, grains, ingredients, feed and food. The Non-GMO Sourcebook website is a companion to the print edition of *The Non-GMO Sourcebook*, <http://www.nongmosourcebook.com/ordernongmosourcebook.php> which has been printed every year since 2002.

- **Non-GMO Shopping Guide and Shopping Tips and Spanish Shopping Guide**

<http://www.nongmoshoppingguide.com/>

Download the Non-GMO Shopping Guide Brochure

http://action.responsibletechnology.org/p/salsa/web/common/public/signup?signup_page_KEY=7042 Read more: <http://www.nongmoshoppingguide.com/>

- **GMO-Free Brands:**

<http://gmo-awareness.com/shopping-list/gmo-free-brands/>

- **Buy Organic Brands That Support Your Right to Know**

<http://www.buycott.com/campaign/674/buy-organic-brands-that-support-your-right-to-know>

- **Articles on GMO Contamination of Organic Foods**

1. *Non-Organic Ingredients Provide Pathway for GMOs in Organic Foods*

http://www.non-gmoreport.com/articles/mar06/non_organic.php

2. *Organic certifiers try to address GMOs in non-organic ingredients* <http://www.non-gmoreport.com/articles/apr06/organic.php>

3. *Non-Organic Ingredients Provide Pathway for GMOs in Organic Foods* http://www.non-gmoreport.com/articles/oct08/vitamins_gmo_challenges_for_organic_industry.php

4. *Most "Natural" Cereals Likely to Contain GMOs*

<http://www.non-gmoreport.com/articles/march2011/naturalcerealscontainingmos.php>