



Non-GMO Project Verification Country of Origin Downgrades: Frequently Asked Questions

INTRODUCTION

The Non-GMO Project Standard requires ongoing testing of all major¹, testable, high GMO risk inputs into Non-GMO Project Verified products. However, a different compliance pathway is available for some high-risk crops that are sourced from countries where genetically engineered versions of that crop are not grown and may or may not be imported. This pathway, known as the Country of Origin (COO) downgrade, can be applied for through your Technical Administrator (TA). If approved, the testing requirements for high-risk inputs may be voided or significantly reduced.

COO DOWNGRADES FREQUENTLY ASKED QUESTIONS

What is a COO downgrade?

Major, high-risk, testable inputs can demonstrate compliance with the Standard through testing or, if eligible, through a risk reclassification downgrade (the approval for which is based on the GMO regulations and practices in the country from which that crop is sourced). To be considered for a COO downgrade you must complete an application and submit required documentation through your TA. The downgrade has requirements that include the submission of specific documentation and the potential for annual monitor testing.

Can you give an example of a COO downgrade?

If a product contains cornstarch, for example, that was derived from corn grown in a country where GMO corn is not cultivated or imported (or where it is imported but the country has adequate regulatory controls in place) a COO downgrade may be appropriate. Documented identity preservation (IP) procedures must be in place for the manufacture and transport of the Input. Your TA will determine whether or not the corn from the source country is eligible for a COO downgrade.

What crops are eligible for downgrade?

High-risk crops that are eligible for a downgrade include alfalfa, canola, corn², cotton, papaya, soy, sugar beet, and zucchini and yellow summer squash, as well as their mono-input derivatives. Please see the Standard for the most up-to-date list of GMO risk crops.

Compound ingredients cannot be downgraded, although individual inputs into the compound ingredient are eligible. If other inputs into the compound ingredient cannot comply via a COO downgrade, they will have to comply via a different compliance pathway (such as testing if they are high-risk).

1 A major ingredient is one that represents 5% or more of the finished product or is a defining ingredient.

2 Popcorn is not considered to be a high-risk crop because there is no evidence that popcorn has been genetically modified, and popcorn does not cross-pollinate with other types of corn so there is no contamination issue.

*This document is an informational flyer that seeks to answer some of the most common questions we receive regarding the verification process. It is not a substitute for the Non-GMO Project Standard. **If you have any specific questions regarding how the verification process may affect your product(s), please contact our Client Services team at verification@nongmoproject.org.***

Who determines whether a crop from a specific country is eligible for a COO downgrade?

The Project develops the criteria and makes determinations as to whether an input is eligible for a downgrade. Your TA will approve a COO downgrade if your input meets these criteria and you submit the appropriate documentation. Please note that a COO downgrade will never be granted for a high-risk crop grown in a country in which a genetically modified version of that crop is also grown.

What are the requirements, and what documentation will I need to submit to my TA to receive a COO downgrade?

Your TA will ask you to submit information regarding third-party IP certification or a standard source declaration form attesting to the source and handling of the input. Depending on the crop and country, you may also be required to perform annual monitor testing. The following provides a few more details on each of these requirements:

Third-party IP certification tracing back to geographical source: This certification confirms that systems to protect the non-GMO integrity of that crop and/or Input are in place.

Source Declaration: The source declaration is a standard form created by the Project that must be signed by an individual who has sufficient knowledge of the supply chain to authoritatively make the declaration.

Annual Monitor Testing: When required, PCR testing must be conducted by a laboratory that is ISO-17025 accredited to perform the necessary tests.

How do I apply for a COO downgrade?

Once evaluation has begun, the participant is responsible for requesting a COO downgrade for crops/inputs that may be able to demonstrate compliance through this pathway.

Does the language for declarations matter?

Yes, all compliance documents must be in clear and accurate English. When translations are required, the original native language document must also be provided.

If I have more questions, what section of the Standard can I refer to in regard to COO?

V14.2 Section III.B.1.

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