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## OTCO GMO SAMPLING INSTRUCTIONS

### Sampling Seed Cotton For GOTS

The following instructions provide guidance in how to collect samples of seed cotton at GOTS certified gins. The end test results will be used to support Transaction Certificate (TC) issuance for GOTS, as well as our required data tracking to GOTS.

#### **Testing Laboratories**

You will need to use a lab that is approved to conduct tests according to the IWA32:2019 protocol. This list of approved labs is found here: [https://global-standard.org/images/220217\\_Global\\_ISO\\_IWA\\_32\\_2019\\_Proficiency\\_Test\\_Initiative\\_Labs\\_2021.pdf](https://global-standard.org/images/220217_Global_ISO_IWA_32_2019_Proficiency_Test_Initiative_Labs_2021.pdf)

OTCO has worked with OMIC USA with much success and has developed a good working relationship with them. The OMIC staff are very knowledgeable regarding cotton.

OMIC's GMO Analysis Sample Submission form is available from this link:

[https://i13e4e.p3cdn1.secureserver.net/wp-content/uploads/sample\\_submission\\_forms/OMIC-USA-GMO-Analysis-Request-Form.pdf](https://i13e4e.p3cdn1.secureserver.net/wp-content/uploads/sample_submission_forms/OMIC-USA-GMO-Analysis-Request-Form.pdf)

#### **Preparing for Sampling**

The sample event must be performed when there are organic seed cotton modules awaiting ginning because seed cotton is preferred and does not require opening already-compressed bales.

#### **Tools Needed for Sampling**

- New, 1-Gallon Ziploc (or any heavy-duty, resealable) bags
- Sample submission worksheet from OMIC Labs (or another accredited lab to IWA 32:2019)
- Disposable gloves for sampling

#### **Sample Size**

Select one organic seed cotton module per farmer for sampling. Each sample must be composed of 100 sub-samples (referred to as "tufts") collected throughout the layers of the seed cotton module. Each sample should weigh between 25g-50g.

#### **Collecting the Sample**

- Wear disposable gloves while collecting samples.
- Beginning at the top of the module, push aside any soiled cotton (dirt) from one side of the module. Then catch a tuft of cotton and remove from the module to extract the tuft. Add to a new, clean Ziploc 1-gallon bag.
- Repeat, selecting sampling spots randomly, across and down the end of the module until 100 tufts have been collected from across the entire side. Figure out what a "tuft" looks like and then find a way to take 5 tufts at a time to save time. Be sure to take tufts from throughout the whole bale.



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- Label the sample bag with the farmer's name and module number, along with the Farm Scope Certificate ID number also used on TC requests (= CLIENT ID).

### Completing the Paperwork:

These instructions are based on the included and highlighted OMIC GMO Analysis Sample Submission Request form. If you choose to use a different accredited lab, please discuss the necessary paperwork with them.

- Please review the form prior to taking a sample. There is space for 4 samples on each copy of the form. Consider filling in the form and labeling your bags before heading into the yard to collect samples.
- CLIENT ID = Farm Scope Certificate ID number used in TC requests
- MATRIX = IWA32:2019
- This is NOT for the Non-GMO Project

### Packaging the Sample:

- Samples should be in well-labeled and properly sealed Ziploc bags with accompanying paperwork included with the samples in the box. **SEND THE SAMPLE TO THE LAB AS SOON AS POSSIBLE.**

### What to do when you receive Results:

- Review results and note which samples contain "detect" and which contain "non-detect".
  - **NOTE:** the FIRST line item will always be the Cotton Gene which WILL be a "detect". This means that it IS cotton.
- If the rest of the gene markers on the list say "non-detect", then you may consider that lot of cotton to have a "clean test." The bales from that lot may be released for sale and to have TC Request written. For every farm with bales included on a TC a GMO test must be submitted.
- If you receive a test that has "detect" within the gene markers, please contact the lab you used and ask them to run a QUANTITATIVE TEST on the most likely marker to cause the high number, then have them run that test. NOTIFY OTCO of any GMO DETECTS.
- When you receive the QUANTITATIVE RESULTS, proceed by reaching out to OTCO for support.

**ANY GMO "detects" must be reported to OTCO** and the bales from that farmer's harvest **must be held** until OTCO is able to investigate the exposure and release the bales if able. We will work as quickly as possible to complete investigations.

### PLEASE NOTE:

- **NO cotton may be sold or represented by a TC unless it has a "Non-Detect" Test and has been released by OTCO or a "Detect" test has been investigated and released by OTCO. Please do not make TC Requests until sample results are received.**
- **Once you have non-detect tests you may begin to request TC Requests for those bales.**
- **Once you have received a letter of release regarding any detect tests, you may begin to request TC Requests for those bales.**
- **Remember: Copies of these test results must accompany every TC Request.**