

ASTA Supports Science-Based Policies and Regulations



The American Seed Trade Association supports policies that are based on sound science and certainty in regulations so that the industry can make long-term investments in new tools and technologies to benefit farmers and consumers.

Need for a Functional US Regulatory System for Biotech Traits

The goal for our seed companies is to get the best solutions possible into the hands of farmers when they need them. Over the years, the impressive performance and safety record of biotech crops has grown and farmers around the world have adopted this new technology rapidly. A recent report by the International Service for the Acquisition of Agri-Biotech Applications says a record 18 million farmers in 27 countries are growing biotech crops on 433 million acres. In addition, biotechnology has a 20-year record of safety and almost 2,500 independent, global scientific reviews and approvals of GMO crops.

From 1992 to 2000, the United States Department of Agriculture made decisions to deregulate biotech crops in the legally required time frame of 180 days on a regular basis. In spite of instituting process improvements in November 2011, the average time from submission to deregulation in 2013 was 890 days. The regulatory system is no longer risk-proportionate. As evidence of the safety of biotech crops has mounted, the data requirements have increased significantly rather than decreased.

USDA has been the subject of extensive litigation that is unrelated to the safety of biotech crops which has led to unnecessary delays in product approvals and escalating information requirements to gain those approvals, in spite of a well-established history of safe use.

As the U.S. regulatory system has slowed, the systems in other exporting countries have become increasingly efficient, creating a threat to U.S. agricultural competitiveness. For example, the ISAAA noted in its recent report, for the fifth consecutive year, Brazil increased its hectareage of biotech crops more than any other country in the world – a record 3.7 million hectare increase, equivalent to a year-over-year increase of 10 percent.

Farm Bill Imported Seed Fix Helps Reduce Delays

Language was included in the farm bill to clarify the requirements of USDA and EPA on imported seed. ASTA appreciates that the language was introduced on a bi-partisan basis and that members of the House and Senate recognized the importance of getting seed to farmers in time without unnecessary bureaucratic hurdles.

ASTA Supports Federal Biotech Labeling Policy

The labeling of foods that utilize ingredients derived from GM technology has been elevated to a national discussion. Last year there were labeling challenges in states across the country spearheaded by organizations that do not support the use of biotechnology. A patchwork of GMO labeling

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laws would mislead consumers, raise the price of groceries for American families and do nothing to advance food safety.

People have a right to know about their food, but we want to ensure that this information is science based, transparent and consistent across the country. Labels should be reserved for important safety, health and nutrition information. Every credible U.S. and international food safety authority that has studied GM crops has found that they are safe and that there are no health effects associated with their use.

ASTA supports current FDA labeling policies and is committed to consumer outreach and education through resources like *GMOanswers.com*. Organizations across the food value chain are seeking federal legislation to further establish FDA as the authority on the safety review of new traits and labeling of foods containing ingredients derived from biotechnology.

ASTA Does Not Support Reducing the Renewable Fuel Standard

The seed industry backs the existing requirements in the Renewable Fuel Standard because they support innovation. The significant reduction that has been proposed by EPA will undermine the growth of the vital renewable fuels sector creating a harmful trickledown effect.

The seed industry is developing new varieties and feedstocks which will benefit a range of fuels from conventional ethanol to advanced biofuels. This technology, in part, is being developed due to the certainty provided by the RFS. Innovative new technologies will allow by-products such as wheat straw and corn stover to be processed into ethanol.

Rural employment and income have risen as ethanol production has expanded under the RFS. In 2013 alone, over 87,000 American jobs were directly tied to the production of ethanol. Many of these are in local ethanol plants in rural America. Furthermore, American ethanol added more than \$43 billion to the national Gross Domestic Product in the past year.

If adopted, the proposed change would permanently alter the RFS and set a dangerous precedent for future Renewable Volume Obligations rulemakings. Farmers will begin planting shortly. Reducing the RFS will create uncertainty for farmers, commodity markets and seed companies in 2015 and beyond.