

Draft Group Comments on APHIS

August 18, 2021

United States Department of Agriculture
Animal Health and Plant Inspection Service
Docket Clerk
Regulatory Analysis and Development, PPD, APHIS
Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

Submitted via www.regulations.gov

RE: Proposed Rule –Document Number: 86 FR 37988

On behalf of the farmers, ranchers, researchers, processors, developers and cooperatives, represented by the organizations signed below (*will amend this pending final signatories*), we appreciate the opportunity to comment on the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service's (APHIS) proposal to "Exempt Plants with Additional Modifications Produced Using Genetic Engineering That are Otherwise Achievable by Conventional Breeding." Our groups represent a **significant number/the majority** of agricultural interests in the United States, and many of us also provided feedback on the SECURE Rule, which was finalized on May 14, 2020. Our associations and stakeholders support a regulatory system that recognizes the long and safe track record of genetically engineered (GE) plant breeding technologies, fosters innovation, greatly reduces unnecessary regulatory hurdles and will further global acceptance of biotechnology. We applaud APHIS for engaging with stakeholders throughout the regulatory update process and for offering these proposed exemptions from the current regulatory framework. On balance, the current SECURE Rule provides an appropriate amount of regulation based upon risk, and we appreciate APHIS for proposing improvements in the form of additional exemptions, which we support.

Our members are very interested in the potential benefits that new technologies can bring to the environment, our ability to feed the world, and our work efficiencies. In addition, our organizations embrace the use of biotechnology and recognize the many benefits it has brought to American agriculture. We want to specifically highlight the fact that agricultural biotechnology needs to be a part of any climate change discussion. Modern agriculture has achieved notable and well documented environmental benefits, for example through the adoption of biotechnology that has enabled improved tillage practices; this in turn has improved soil health and greatly reduced greenhouse gas (GHG) emissions. We are proud of the accomplishments achieved to date but are even more excited about the potential environmental benefits and climate change mitigation that could be possible through the continued development and adoption of biotechnology tools such as Genetically Modified Organisms (GMOs) and through gene editing.

We support the ongoing development of new breeding methods that have the potential to bring incredible advances to agriculture, environmental protection, and our global food system. In order for U.S. agriculture to succeed, we must have access to every tool available to address future challenges such as catastrophic weather events and rapidly evolving pests and diseases. We must do this while meeting consumer expectations for reductions in the use of crop inputs and new varieties of healthy and affordable food options.

While we appreciate the general direction of the proposed exemptions, we believe that the scope should be broadened to improve grower access to additional technologies. Specifically, the proposal does not adequately address concerns related to the status of gene-edited polyploid crops for which a case-by-case regulatory status review is currently the only option. Broadening the proposed exemptions will allow American agriculture to maintain its position as a world leader on plant breeding issues, reach climate resiliency, and improve food security.

We appreciate your thoughtful consideration of our submission and stand ready to answer further questions or supplement additional details should you request them.

Best,

Agricultural Retailers Association

American Farm Bureau Federation

American Seed Trade Association

American Sugarbeet Growers Association

Biotechnology Innovation Organization

Crop Science Society of America

National Corn Growers Association

National Cotton Council

National Council of Farmer Cooperatives

U.S. Canola Association