

December 6, 2011

Office of Science and Technology
Request for Information: Building A 21st Century Bioeconomy
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The undersigned agriculture associations appreciate the opportunity to submit comments as the Office of Science and Technology prioritizes approaches to building the U.S. bioeconomy. America's agricultural producers are taking on new roles. As technology evolves, farming operations do, too. Meeting demand, improving processes, and minimizing environmental impacts are what make modern agriculture a dynamic industry. Each of our organizations has a strong interest in the availability of new technology to enhance the sustainability, productivity, and competitiveness of U.S. agriculture. In developing a blueprint for the bioeconomy, it is imperative that the U.S. agriculture industry continues to lead the way with innovation, product development and acceptance of biotechnology crops.

Within each broad category below, numbers correspond to the specific questions proposed in the Request for Information.

Grand challenges

1. The United Nations estimates that the world population will reach 9.3 billion people by 2050. With only three percent of the Earth's surface suitable for food production, there will be intensified pressure for farmers to feed, fuel and clothe a growing population using the same amount of land with fewer energy and water resources. Biotechnology is imperative to tackling such monumental challenges.

Plant biotechnology has provided numerous benefits to U.S. agriculture including production gains that enhance global food security. Biotechnology crops have improved the ability of producers to meet market demand, both domestic and international, while supporting their rural economies. Furthermore, production efficiencies gained by utilizing biotechnology crops have resulted in higher yields, more efficient use of cropland, reduced labor and reduced crop rotation requirements.

In the words of Dr. Norman Borlaug, "civilization as it is known today could not have evolved, nor can it survive, without an adequate food supply." American agriculture has long been at the forefront of meeting the world's ever-expanding needs for food, feed and fiber. The availability of corn, cotton, soybeans, sugarbeets, canola, alfalfa, and other crops enhanced through biotechnology will continue to assist the U.S. farmer in providing for the world's growing population. The development and adoption of these products, and the promise of new products, make possible the continued availability of agricultural goods to consumers in the U.S. and worldwide.

An example of the future potential for biotechnology is wheat. According to the Food and Agriculture Organization of the United Nations, 20 percent of the calories consumed by the human race are derived from wheat. In recent years, droughts in Russia and Australia made global supplies uncertain, and this year U.S. farmers in some states experienced drought while other states were plagued by flooding. Innovation will be the key to the United States' ability to improve wheat production, keep up with a growing global population and adapt to changing climatic conditions around the world.

Reducing regulatory barriers to the bioeconomy

13. The United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) is refining regulations to assist in constructing defensible permitting and deregulation decisions in anticipation of legal challenges under the National Environmental Policy Act (NEPA) and other non-agricultural statutes. To date, legal challenges to APHIS decisions have been based almost exclusively on procedural grounds. As interveners or parties in many of these cases, our organizations understand that litigation, not based on human health and environmental safety, attempting to reverse APHIS's field trial and deregulation decisions is costly and troubling. Legal costs, including the adverse effects of injunctions, are an unnecessary drain on the resources of the federal government, growers, commodity organizations, and biotechnology companies.

Legal decisions not based on science put the United States at risk of not being able to capitalize on the opportunities and benefits provided by biotechnology. The time and resources expended to litigate needless legal challenges has been debilitating to USDA's efforts to review and approve new products.

14. With more than 20 new plant biotechnology traits awaiting a regulatory decision, it is essential that APHIS continue its scientifically-sound and predictable safety-based regulatory process. We appreciate and support the role of the USDA in regulating plant pest risks under the Coordinated Framework for Regulation of Biotechnology (Coordinated Framework). As part of the National Bioeconomy Blueprint, we urge USDA to strengthen the Coordinated Framework, while maintaining the key principles and scientific rigor that have been the hallmark of the U.S. regulatory process for products of biotechnology since 1986. As APHIS continues revisions to Part 340 regulations that guide permitting and deregulation decisions for products derived from biotechnology, we stress the importance of transparency, public involvement, and rigorous safety oversight. Amended regulations should continue to be based on safety and sound science, as provided by the Plant Protection Act. Reviews should be product-based, not process-based. Marketing decisions should not be a factor in safety assessments of products derived from biotechnology.

All previous permitting and deregulation decisions under the existing Part 340 regulation should be maintained, unless new information becomes available that requires APHIS to revisit a specific decision. We recognize there is a possibility that new information may come to light that provides a scientifically valid basis for regulation of a previously deregulated plant or organism. In such a case, the federal government has the authority to take appropriate action for that organism.

We also support the goal of enhanced recordkeeping requirements to facilitate the agency's compliance and enforcement activities under the Plant Protection Act. Recordkeeping requirements for new permitting applications have improved significantly in the last several years. Going forward, it is important to ensure that all such requirements are justified and correspond with risk. Unnecessarily burdensome recordkeeping requirements can result in needless regulatory delays for categories of products being reviewed for field tests or deregulation.

Additional Information Relevant to the Development of the National Bioeconomy Blueprint

Our organizations have a strong interest in the continued coexistence of different cropping systems to facilitate grower and consumer choice without undermining the exceptional record of innovation,

productivity, and product stewardship in U.S. agriculture. The broader debate over the coexistence of commercialized biotech and non-biotech agricultural products can, and should, remain constructive.

We urge the administration to maintain a perspective on the contribution of production agriculture to the U.S. economy, the history of different agricultural production practices, and the interest in continued access to scientifically sound and safe technologies. In 2010, more than 50 percent of production cropland in the U.S. was planted with seed developed with modern biotechnology. Over the same period that modern biotechnology was commercialized, organic and other identity-preserved, non-biotech markets, though they remain relatively small based on consumer demand, have prospered and enjoyed steady growth. Different agriculture cropping systems have been successfully practiced in close proximity for decades.

Summary

As stakeholders in the development, deregulation and commercialization of biotechnology crops, the actions taken by government agencies on these crops have a direct impact on timely access to future traits now under development. In reviewing stakeholder comments and ultimately crafting the National Bioeconomy Blueprint, we urge the administration to maintain the integrity of the regulatory process with respect to biotechnology crops. We look forward to working with you to ensure commonsense approaches that allow for availability and future development and adoption of these tools to meet the food, fuel and fiber demands of our expanding population.

National Council of Farmer Cooperatives
National Corn Growers Association
American Farm Bureau Federation
National Association of Wheat Growers