

February 18, 2016

Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

Submitted Electronically via Federal eRulemaking Portal (<http://www.regulations.gov>)

Re: Docket No. APHIS-2014-0054 – Environmental Impact Statement; Introduction of the Products of Biotechnology

Dear Sir or Madam:

We, the undersigned organizations, appreciate the opportunity to provide comment on APHIS' Notice of Intent (NOI) to prepare an environmental impact statement in connection with potential changes to APHIS biotechnology regulations (7 CFR 340). Our member organizations represent a broad cross-section of stakeholders having a significant interest in the future of U.S. agriculture, including farmers, grower groups, handlers, marketers, processors, manufacturers, distributors and exporters of agricultural products, as well as seed companies and technology providers.

Our organizations all have a significant stake in the ability of U.S. growers to have access to products of cutting-edge technologies, in fostering continued public confidence in the U.S. regulatory system and in preserving U.S. access to international markets. Innovative plant and animal breeding techniques, including biotechnology, hold enormous promise for improving the productivity and environmental sustainability of food, feed, fiber, biofuels, and animal production. We are fully committed to engaging constructively with APHIS to help the agency reach its regulatory goals and to develop a successful, broadly-supported system of regulation that provides risk-appropriate oversight that is consistent with the need for growers to have timely, reliable access to the products of innovative breeding techniques while at the same time not disrupting access to markets.

We are supportive of APHIS's efforts to take a hard look at its regulations, to ensure that they are up-to-date with the best-available science and utilize the more than 20 years of experience APHIS has in reviewing the safety of these crops. However, because the options that APHIS is considering include potential major departures from the current regulatory framework, it's critically important that adequate time be given so stakeholders may fully evaluate the NOI and its implications, including whether the regulatory alternatives presented are compatible with regulatory approaches utilized by other competent government authorities particularly those in important U.S. export markets, or, conversely, will pose a risk of trade disruptions.

A thirty-day comment period with regard to the NOI does not allow all interested stakeholders adequate time to formulate robust and constructive comments on the broad and complex issues explored in the NOI.¹

We respectfully submit that a lengthier comment period is needed to allow for adequate public input on the wide-ranging issues described in the February 5 notice, particularly given that the options presented in the NOI include ones that are significantly more complex and a much greater departure from current regulations than the revisions proposed for these same regulations in 2008.

Therefore, the undersigned organizations respectfully request that the agency extend the comment period associated with this notice by an additional 60 days, to May 6, 2016. We look forward to continuing to engage with APHIS in its policy dialogue with a broad array of stakeholders and interests, as we and others seek to consider the agency's proposals and provide constructive feedback for its consideration.

Sincerely,

Agricultural Retailers Association
American Farm Bureau Federation
American Seed Trade Association
American Soybean Association
American Sugar Cane League
AmericanHort
Biotechnology Innovation Organization
Grocery Manufacturers Association
National Association of State Departments of Agriculture
National Association of Wheat Growers
National Corn Growers Association
National Cotton Council
National Council of Farmers Cooperatives
National Grain and Feed Association
National Oilseed Processors Association
National Sorghum Producers
National Sunflower Association
North American Export Grain Association
Produce Marketing Association
Society of American Florists
Sugar Cane Growers Cooperative of Florida
U.S. Canola Association
U.S. Grains Council
United Fresh Produce Association

¹By way of comparison, in 2004, APHIS solicited comment on the NOI associated with what became the 2008 proposed rule for 60 days, and later extended the comment period to a total of 81 days. Public interest in the topic under discussion has likely grown significantly since 2004.