

December 23, 2022

Office of Science and Technology Policy  
U.S. Environmental Protection Agency (EPA)  
Food and Drug Administration (FDA)  
U.S. Department of Agriculture (USDA)

Re: Docket No. APHIS-2022-0076 and RFI Response: Biotechnology and Biomanufacturing Initiative

Submitted Via Email: [biotech-regulation@ostp.eop.gov](mailto:biotech-regulation@ostp.eop.gov); [Mendelsohn.Mike@epa.gov](mailto:Mendelsohn.Mike@epa.gov); [Eric.Flamm@fda.hhs.gov](mailto:Eric.Flamm@fda.hhs.gov); [Alan.Pearson@usda.gov](mailto:Alan.Pearson@usda.gov); [biotech@ostp.eop.gov](mailto:biotech@ostp.eop.gov)

To whom it may concern:

The farmers, cooperatives, researchers, retailers, seed producers, scientists, technology developers, and biotechnology users represented by the organizations below welcome the National Biotechnology and Biomanufacturing Initiative (NBBI) in advancing biotechnology in the development of cross-sector solutions to address challenges facing today's food and agriculture systems. In addition, we share the goals specified in Section 8 of Executive Order 14081 to further clarify and streamline regulatory policies in a science-based, risk-proportionate manner.

Our organizations embrace the use of biotechnology in plant, animal, and microbial applications and recognize the many benefits biotechnology has enabled American agriculture to achieve. The full potential of innovation in the U.S. agriculture sector and global food security can only be realized when the policy environment, including regulatory approaches, support equity in access for small- and medium- sized public and private entities. Therefore, it is important that OSTP and the regulatory agencies maximize opportunities for these entities to provide comments.

The publication of the RFIs immediately prior to the holiday season makes compiling comments from the stakeholder community challenging, as many organizations are closed for several weeks in December and January. Additionally, the window of time to provide comments is shorter than the traditional 60-day comment period normally used in Federal Register notices, which could potentially limit stakeholders' ability to provide adequate feedback. The reports resulting from these RFIs are likely to influence the work of several federal agencies for many years into the future. An extension of the comment period of at least the full 60 days would help encourage feedback from a broader stakeholder community in a more inclusive manner.

Thank you for your consideration of this request. We look forward to submitting comments to assist Federal agencies in meeting the goals and objectives of the Executive Order.

Sincerely,

American Seed Trade Association

American Soybean Association

American Society of Plant Biologists

Biotechnology Innovation Organization

Corn Refiners Association

Crop Science Society of America

Institute of Shortening and Edible Oils

International Fresh Produce Association

North American Millers' Association

National Corn Growers Association

National Cotton Council

National Council of Farmer Cooperatives