

March 4, 2014

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

Re: U.S. Department of Agriculture Docket No. APHIS-2013-0047

Dear Sir or Madam:

We welcome the opportunity to provide comment to the U.S. Department of Agriculture (USDA) regarding their request to identify ways to foster communication and collaboration to further agricultural coexistence. Our organizations have been active participants in the dialogue undertaken by the USDA's Advisory Committee on Biotechnology & 21st Century Agriculture (AC21) since it was reconstituted in 2011. These comments reflect many of the recommendations that were made over the course of the five, face-to-face meetings of the AC21 in 2011 and 2012, as well as written comments submitted by AC21 members to the final report presented to Secretary Vilsack in November 2012. We applaud the USDA's decision to move forward with a key recommendation of the final AC21 report to foster communication and collaboration to strengthen coexistence.

Our organizations strongly believe that coexistence is working. Across the U.S., multiple production and cropping systems are thriving in response to market demands. Coexistence is not a new practice, nor is it unique to biotechnology-derived crops. Individual farmers routinely incorporate multiple production practices within a single operation. Coexistence is not about health or safety; it is about finding ways to improve working relationships when different production systems are used in close proximity. During the AC21 meetings, the AC21 members discussed how coexistence has been accomplished through local and regional farm level practices such as separating crops by distance, utilizing different planting times, contracts, seed quality management systems, minimizing physical seed mixing, and respecting and communicating with neighbors. Further, during the course of the AC21 meetings, no evidence was presented that might indicate that economic harm is routinely being experienced by farmers due to the unintended presence of GE material. So, we agree with USDA's goal to further education efforts to strengthen collaboration between neighbors.

Our organizations are ready to work with USDA and assist in outreach and education efforts around stewardship to foster good neighbor-to-neighbor relations between farmers serving the GE, non-GE, identity preserved (IP) and organic markets. We can disseminate information to our members through our meetings and communications. But, we urge USDA to build on existing education materials and local outreach networks to deliver scientifically-sound information. USDA should partner with state departments of agriculture, universities and local cooperative extensions services on focused education and outreach efforts. Extension agents and crop advisors at the local level have the best expertise to address stewardship recommendations that are appropriate for specific geographic locations and crops. We also suggest that these education programs be tailored to those who are

producing for IP markets because it is the responsibility of the grower seeking to attain a premium from IP crops to implement the necessary practices to preserve identity. In general, we recommend national level education efforts where national standards, such as those implemented by the National Organic Program, must be met. Because coexistence is not something that can effectively be addressed through regulation, APHIS should not be responsible for soliciting and disseminating data associated with coexistence.

USDA requested information in four main areas which broadly can be grouped within information needs and successful communication methods, education tools needed to encourage communication, the role for USDA in disseminating information and recommended meeting formats. The information provided below is in response to the questions posed by USDA.

Current stewardship recommendations are, appropriately, crop and location specific. Farmers use a variety of sources of information to help them address their particular production challenges. It is critical that any information given to farmers related to coexistence be relevant to their own specific operation and be based on sound-science. Farmers already have numerous legal and regulatory requirements under which they must operate. Any recommendations from USDA related to coexistence must be appropriate for the biological systems within which farmers work and must not be in conflict with other legal obligations and rights.

Many organizations are already participating in stewardship education. As an example, seed companies include regulatory information in the agreements that are signed by growers prior to planting. They may also include recommendations in the technology use guides to encourage communication with neighbors on field management practices, like isolation distances, buffers between crops, border rows, planting dates and handling practices designed to maintain product integrity and quality. Seed companies have also partnered with farmer organizations to increase educational awareness and understanding of coexistence.

In addition to their role formulating policy priorities, national farmer organizations also disseminate information to growers related to production practices and stewardship. As an example, the National Corn Growers Association publicizes regular updates on the commercial status of biotech events and includes a guide to biotech approval status of specific varieties in major markets on its website. The American Soybean Association works extensively with seed and technology companies on the stewardship practices required of growers for biotech varieties that aren't fully approved in major export markets. The American Farm Bureau Federation urges its members to understand the terms of any production agreement they sign and to understand what they can and cannot guarantee as an IP farmer.

There are opportunities for USDA to distribute information related to coexistence at national meetings such as Commodity Classic or the American Farm Bureau Federation annual convention, in addition to national meetings of farmers specializing in IP crop production. However, our recommendation is that USDA focus its resources on utilizing existing local

education networks, such as those operated by university extension programs, state departments of agriculture and certified crop advisors.

Almost all land grant institutions and extension programs in the nation focus on strengthening agriculture and developing learning partnerships that help adults and youth enhance their lives and communities. Extension work focuses on citizen engagement and identifies program teams that consist of county, area, and state staff, including researchers that foster coexistence. These programs include, but are not limited to, community, economic development, and leadership; crop management; family economics; farm business management; 4-H youth development; horticulture and forestry; human development and family science; livestock management; natural resources management; and nutrition, food safety, and health. Many state departments of agriculture also have programs in place for outreach and advocacy. Combining these efforts with university extension can offer a quick and effective response system that addresses urgent situations, as well as providing accurate information pertaining to community issues such as best management practices. As stated previously, it is crucial that education and outreach efforts conducted by university extension and state agencies be focused on the local level because these networks understand agricultural challenges based on soils, topography, climate, types of crops grown, production methods, equipment, and practices used to produce food and feed for conventional and IP markets.

USDA can also look at currently existing government programs to continue promoting awareness of coexistence. Beginning farmer and rancher programs, the Natural Resources Conservation Service Environmental Quality Incentives Program, the Sustainable Agriculture Research and Education Program, the National Institute of Food and Agriculture, the National Agriculture Library's education and outreach apparatus, and the National Organic Program are several tools that USDA has available to help it disseminate local, crop-specific, and science-based information about coexistence, in coordination with university extension and state agriculture departments.

Joint stewardship plans are practical primarily to address issues that can have significant economic impact on a broad geographical area such as those related to pests and diseases. As an example, a Citrus Health Response Area was created in Florida to manage regional programs to address citrus canker and other diseases. However, neighboring farmers can come together to jointly develop specific production plans, on a voluntary basis, so that they may take advantage of market opportunities together.

In conclusion, we respectfully note that for decades, a hallmark of US agriculture has been the ability of farmers to pursue diverse cropping systems and respond to consumer demand for high-value IP and specialty crops. The diversity and dynamism of the US agricultural industry would not be possible but for the past and continuing success of coexistence. The idea that there is "war in the countryside" is not borne out by the personal experience of the vast majority of American farmers or the evidence presented at the meetings of the AC21 committee. The food and agriculture industry has developed many effective tools and methods that prevent commingling of crops, and that foster crop diversity and farmer

choice. To be most effective, any education and outreach initiative should be guided by the following priorities:

- **Grower leadership and expertise.** These efforts should be led by farmers and educators that have expertise in crop production and have an interest in identifying and promoting effective local solutions.
- **Local solutions.** A key objective of efforts to promote coexistence should be to identify and disseminate information so farmers can adopt effective solutions at a local level. Therefore, any program should be flexible and take into account the local and regional diversity in agriculture and needs related to coexistence.
- **Crop specific.** Because of biological differences, any program should be designed to be flexible and responsive to the specific agronomic and coexistence needs of individual crops and cropping systems.

Sincerely,

Agricultural Retailers Association
American Farm Bureau Federation
American Seed Trade Association
American Sugarbeet Growers Association
American Soybean Association
Biotechnology Industry Organization
CropLife America
National Association of Wheat Growers
National Corn Growers Association
National Cotton Council
National Council of Farmer Cooperatives
Western Growers