

July 6, 2012

The Honorable Frank Lucas
Chairman
House Committee on Agriculture
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Collin C. Peterson
Ranking Member
House Committee on Agriculture
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Lucas and Ranking Member Peterson:

Our members are engaged in the development, use and future utilization of agricultural products derived through modern biotechnology, and support comprehensive and efficient regulation of these products. We are writing to express our strong support for the provisions of the *Federal Agriculture Reform and Risk Management Act of 2012*, which would reduce unnecessary regulatory duplication by clarifying the roles of the regulatory agencies with respect to health, safety and environmental reviews, ensure that agency resources are focused on the highest priority tasks, provide concerned parties with a prompt opportunity to challenge deregulation determinations, and reinforce the overarching principle of sound science in agency decision-making.

Regulatory oversight of agricultural biotechnology has been provided by the federal government since 1986, well before the first products were commercialized more than 15 years ago. The *Coordinated Framework for the Regulation of Biotechnology* assigns specific regulatory responsibilities to USDA's Animal and Plant Health Inspection Service, the U.S. Food and Drug Administration, and the U.S. Environmental Protection Agency and ensures that crops developed through biotechnology are as safe to grow and eat as conventional crops.

The use of biotechnology in agriculture has yielded significant economic and environmental benefits, lowering the cost and environmental impact of farming in the United States and 21 other nations. The success of the technology can be attributed, in part, to the U.S. government's thorough scientific reviews, which ensure the safety of products to the environment and consumers. With more than 25 years of regulatory experience and not a single documented incident of actual harm to human health or the environment, it is an opportune time to reduce regulatory burdens where appropriate, redirect agency resources, and clarify regulatory roles and responsibilities.

Regrettably, inefficiencies and duplication within the regulatory structure, in addition to a stream of lawsuits that are filed against the U.S. government's science-based deregulation determinations for agricultural biotechnology, slow down the regulatory process for emerging products and create uncertainty for growers and for academic researchers and innovators eager to introduce valuable new technologies into the agricultural marketplace. These challenges led to extensive, ongoing oversight activities carried out by your committee spanning the last two years and reaching out to a diverse cross-section of the agricultural sector that represented every aspect of the food chain.

In testimony last year before the House Agriculture Subcommittee on Rural Development, Research, Biotechnology, and Foreign Agriculture, an esteemed academic expert testified that "new inventions developed through genetic engineering that have a good likelihood of success" are abandoned or delayed getting to the market because of regulatory processes that are "ill-defined or unpredictable, sometimes irrational, and always costly," which is of significant concern to investors and entrepreneurs. This uncertainty has negatively impacted U.S. leadership and competitiveness in global agriculture, as other governments have moved to prioritize technology and streamline regulatory processes. The provisions in this legislation will restore U.S. leadership in the effective and timely regulation of biotechnology, and come at a time critical to U.S. agriculture maintaining its global competitiveness. It is essential that your committee move forward with this legislation as expeditiously as possible.

Agricultural biotechnology is embraced by a vast majority of American producers, as roughly 90 percent of corn, soybeans, and cotton grown in the U.S. are a biotech variety. There are new commodity products in the pipeline. There is, therefore, a great deal of support by farmers and seed companies for working with Congress and the administration to improve the current regulatory system. Regulatory efficiency will ensure agricultural producers have the tools necessary to provide an abundant and economical food supply for American consumers and to grow more food, feed, fiber, and forestry in an environmentally sound and sustainable manner. Experts say that a rapidly growing global population will require farmers to produce as much food in the next 50 years as has been produced over all previous recorded history. A firm commitment to efficient science-based regulation will be essential to enabling U.S. producers to feed the people of our country and our global neighbors.

Regulatory improvements for agricultural biotechnology will also grow a modern 21st Century bioeconomy. According to the *National Bioeconomy Blueprint*, which was completed by the administration in April 2012, technological innovation is a significant driver of economic growth, and agriculture, one of the nation's largest industries, is heavily based on advances in biological research. USDA statistics show, for example, that U.S. revenues from crops improved through modern biotechnology were approximately \$76 billion in 2010. Additional data shows that agricultural exports reached record levels of sales in 2011, totaling \$137.4 billion and resulting in a \$42 billion trade surplus. Because crops derived from modern biotechnology are so prevalent in the marketplace, they contribute greatly to American agriculture's trade surplus. The *National Bioeconomy Blueprint* suggests that, to further grow the U.S. bioeconomy, federal agencies must "develop and reform regulations to reduce barriers, increase the speed and predictability of regulatory processes, and reduce costs while protecting human and environmental health."

We support solutions to improve regulatory efficiency for agricultural biotechnology products. As the House Agriculture Committee considers the *Federal Agriculture Reform and Risk Management Act of 2012*, we urge the retention of language that would improve the U.S. government's regulatory system for these innovative products and look forward to working with you and your colleagues to ensure this language is retained in a final work product.

Sincerely,

Agricultural Retailers Association
American Seed Trade Association
American Sugarbeet Growers Association
National Association of Wheat Growers

American Farm Bureau Federation
American Soybean Association
Biotechnology Industry Organization
National Corn Growers Association