

*AgBiotech Planning Committee
225 Reinekers Lane
Suite 650
Alexandria, VA 22314*

May 29, 2009

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, D.C. 20250

Dear Mr. Secretary:

The AgBiotech Planning Committee (ABPC) supports the United States Department of Agriculture (USDA)'s plan to develop and implement a comprehensive agricultural commodity export strategy. ABPC is a coalition representing farmers, food processor and manufacturers, merchandisers and biotechnology providers that support the continued availability and marketability of products derived from biotechnology.

USDA has an important, legitimate and necessary role to play in coordinating its many activities and responding to trade barriers affecting commodities derived from biotechnology. With 92 percent of U.S. soybean production, 80 percent of U.S. corn production and 86 percent of U.S. cotton production containing biotechnology traits, any commodity export strategy should address trade barriers to products derived from agricultural biotechnology.

ABPC members respectfully submit the following recommendations for consideration as the Department's develops a response to the Office of Inspector General (OIG) report "United States Department of Agriculture's (USDA) Role in the Export of Genetically Engineered Agricultural Commodities."

- USDA support for and promotion of science- and risk-based regulations and policies around the world that affect the development, approval and use of agricultural products derived through biotechnology is critical. The U.S. Government's Coordinated Framework should continue to be the basis for regulation and oversight of agricultural biotechnology products;
- Policies for the export of U.S. agricultural products should encourage and facilitate trade flow. Engagement with U.S. trading partners, and capacity building efforts with current and potential trading partners, should focus on transparent and science-based policies and functioning regulatory systems.
- Leadership from USDA should ensure that the European Union, and other countries that have instituted bans and policies not based on science that negatively affect market access for and the labeling of biotech products, adhere to obligations under the World Trade Organization;
- USDA support for longstanding U.S. government food labeling policy that requires food labeling for products produced through biotechnology only when such products have been significantly changed nutritionally or the allergenicity, toxicity, or its composition have been

altered. The U.S. government should advocate for labeling policies that are based on science, such as the U.S. policy.

- USDA and other U.S. agencies should provide leadership in international discussions regarding the adoption of the *Codex Annex on Food Safety Assessment in Situations of Low-Level Presence of Recombinant-DNA Plant Material in Food* by importing countries. The U.S. Government should remain actively engaged in fora such as the Cartagena Protocol for Biosafety.
- The framework should incorporate the important relationship between regulatory policy and an export strategy. Input from key USDA agencies that deal with the export of biotechnology crops is critical. It is ABPC's view that Foreign Agriculture Service and the Animal and Plant Health Inspection Service should play a leadership role in developing the strategy. Both agencies have important roles in maintaining and developing agricultural export markets.
- The framework should include a mechanism for coordination of all relevant U.S. government agencies with regulatory and trade responsibilities. USDA should provide leadership in developing an interagency strategy.
- The Biotechnology Risk Assessment Research program was amended in the 2002 Farm Bill to focus the goals of the program. It is appropriate that the goals of the program include challenges related to exporting U.S. commodities produced through biotechnology.

Sincerely,

American Farm Bureau Federation
American Seed Trade Association
American Soybean Association
Biotechnology Industry Organization
Corn Refiners Association
National Association of Wheat Growers
National Corn Growers Association
National Cotton Council
National Grain and Feed Association
National Oilseed Processors Association
North American Millers Association
U.S. Grains Council
USA Rice Federation

Cc: Max Holtzman, Senior Advisor to Secretary Vilsack
Jim Miller, Under Secretary for Farm and Foreign Agricultural Services
Cindy Smith, Acting Deputy Under Secretary for Marketing and Regulatory Programs
Michael Michener, Administrator, Foreign Agricultural Service