

July 5, 2012

The Honorable Frank Lucas
Chairman
House Committee on Agriculture
1301 Longworth House Office Building
Washington, DC 20515

The Honorable Collin Peterson
Ranking Member
House Committee on Agriculture
1305 Longworth House Office Building
Washington, DC 20515

Dear Chairman Lucas and Ranking Member Peterson:

As organizations whose member companies represent the vast majority of the food and feed value chain with deep interest in the production of safe and healthful agricultural commodities, we strongly support agricultural biotechnology and other scientific and technological innovations that contribute to agricultural production efficiencies. These advances are crucial to enabling our country to meet the demand for a safe, abundant and high-quality food, feed and fiber supply for U.S. and world consumers.

We have become aware of the planned inclusion of biotech-related provisions in the Chairman's Mark of the House Agriculture Committee's version of the 2012 farm bill. It is our understanding that such legislative proposals are designed to expedite regulatory review of biotechnology-enhanced traits by the U.S. Department of Agriculture's Animal and Plant Health Inspection Service, while attempting to mitigate the plethora of litigation that has surrounded the deregulation of such traits by the agency.

While we empathize with the problem this initiative is attempting to address, we are deeply concerned about the scope and timing of legislating on these matters. Accordingly, we write to express our strong opposition to what we understand to be the current draft of this legislation, and urge that it not be included in the Chairman's Mark for the following reasons:

1. It is ill-timed, bringing biotechnology regulation reforms forward when an adverse legal climate, failed consumer acceptance and market consequences may prevail.
2. The effort will further limit U.S. agriculture's ability to take full advantage of the technology's capacity to meet the growing demand for a safe, abundant and high-quality food, feed, fiber and energy supply for U.S. and world consumers by facilitating the introduction of more and new technology in the absence of necessary and parallel improvements in the U.S. global regulatory environment.
3. There are a host of significant issues that should be addressed in conjunction with the kind of regulatory changes proposed in the current committee draft. For example:
 - The scope of the language does not go far enough to improve transparency and allocate risk responsibilities in a manner that is appropriate and fair to all significant stakeholders in the technology development and distribution marketplace; and

- The current language does not address absolutely necessary improvements concerning how crop biotechnology is managed to avoid the costly and far-reaching disruption of the integrity of the domestic and export supply chain if biotech-enhanced events are commingled with their traditional plant or plant product counterparts in instances where: 1) such biotech events have not been approved or authorized in export markets; and/or 2) express unique functional characteristics that make their presence in either the domestic or export supply chains inappropriate above specified threshold levels.

Resolution of these issues will require a comprehensive and thoughtful review that likely will take some time. As you work toward development of the farm bill in the coming weeks and months, we urge you to omit biotechnology legislative language from the Chairman's Mark, and instead work toward a more comprehensive and equitable solution to the challenges confronting all sectors of the biotech value chain.

Sincerely,

Value Added Biotech Coalition

Corn Refiners Association
Grocery Manufacturers' Association
National Grain and Feed Association
National Oilseed Processors Association
North American Export Grain Association
North American Millers Association
Snack Food Association