



December 6, 2011

Dr. Catherine E. Woteki
Under Secretary, Research, Education and Economics
U. S. Department of Agriculture

Dr. Michael Schechtman, Designated Federal Official,
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Re: Notice of Advisory Committee on Biotechnology and 21st Century Agriculture Meeting, Office of the Under Secretary, Research, Education, and Economics, Agricultural Research Service [Docket No. 2011-30027] 76 FR. November 21, 2011.

Dear Dr. Woteki:

CropLife America (CLA) is pleased to provide comments to the **Advisory Committee on Biotechnology and 21st Century Agriculture (AC21)** of the U.S. Department of Agriculture (USDA), Research Education and Economics (REE) Mission Area on the occasion of the meeting held on December 6, 2011 in which the Committee is addressing agriculture and biotechnology. We laud the objective of the USDA AC21 to advise the Secretary of Agriculture on development of practical recommendations on approaches for bolstering coexistence among different agricultural production methods that form the basis of food production and security for the American people and globally.

CropLife America (CLA) is pleased to present our perspective on the opportunities and benefits of agricultural biotechnology; and to raise priority questions that must be answered within the analysis being done by the AC21. CLA is the premier national association for the crop protection industry. We represent the companies that develop, manufacture, formulate and distribute crop protection chemicals and plant science solutions for agriculture and pest management, including products used as and in conjunction with plant incorporated protectants. CLA's member companies produce, sell and distribute virtually all the crop protection and biotechnology products used by American producers. CLA and its predecessor organizations recently celebrated a 75th anniversary.

The crop protection industry is committed to helping farmers produce an affordable and sustainable supply of food to help feed a hungry world. We cannot take modern agriculture or the research that supports it for granted.

- Modern agriculture includes all methods of production, including use of agricultural biotechnology, conventional agriculture and organic production. Crop protection is essential to modern agriculture. The coexistence of these production methods contributes to the vitality of American agriculture, providing growers and their families with livelihoods founded on stewardship of the land, through best management practices, integrated systems approaches and enhancement of the environment.
- Globally, over 900 million people - one-sixth of the world population - suffer from malnutrition. Agricultural output *has to double in the next 20-30 years* in order to feed the world's population, which the United Nations predicts will grow by 1.7 billion more people by 2030. To meet the global challenges of food production and security, high-yield production of biotech crops using crop protection products will continue as the primary practices that increase total food production.
- The early adoption of crop protection products and the recent rapid adoption of biotech crops have advanced modern agriculture through use of no/reduced tillage production systems and integrated pest management. These approaches provide both economic and environmental benefits including reduced soil erosion and improved soil moisture levels.
- Intensive scientific research and robust investment in technology during the past 50 years helped farmers double food production with out a change in the footprint of total cultivated farmland. Crop protection is one of the most research-intensive industries in existence, with companies investing about 12% of their turnover in research and development (R&D). The top 10 plant science companies invest an estimated \$3.75 billion in R&D per year to discover, conduct tests to ensure safety and develop new products.
- The rigorous science-based regulation of crop protection and agricultural biotechnology serves as the foundation for the safe use of these technologies. These regulatory processes, and subsequent policies, must continue to be grounded in science if we are to advance modern agriculture.

The charge from Secretary Vilsack to the AC21 has highlighted several key issues that should be considered.

- **The priority consideration in the discussion of coexistence should focus on unintended presence of approved GE material in other crop material.**

Without expanding the scope, there should be acknowledgement of other risks that are as, if not more, economically significant, such as invasive species, pest control, quality standards, etc., and for which growers use multiple integrated management strategies to mitigate and avoid.

- **What are the economic losses directly borne by unintended presence of approved GE material in other crop material?** Economic loss should be quantified accurately and equitably. The presence of GE does not equate to economic harm according to the process-based USDA National Organic Program. It is important to note that this is private risk, not human or environmental health or safety. Furthermore, given the recent growth and financial health of the organics industry, as presented by USDA—and its continued success as touted by the industry itself—there appears to be significant evidence of private benefit from bearing the private risk without government intervention.
- **Although it was suggested to avoid legal analysis, what are the legal limitations of the authority of USDA to create a compensation program?** Initial research indicates that neither the Plant Protection Act (PPA), under which biotechnology-derived crops are regulated, nor the Organic Foods Production Act (OFPA), which authorizes the National Organic Program (NOP), authorizes the establishment of a compensation program that would apply to the presence of GE material from commercialized crops. Statutory changes would be needed to impose the Charge's compensation obligations under either of these laws. Furthermore, the OFPA is silent as to the use of biotechnology in organic agriculture, and the NOP does not require the absence of all GE material from organic crops (the NOP's prohibition goes to the use of GE products, not the mere presence).
- **What continued investments in research and training future agricultural experts are needed for future viability of coexistence in modern agriculture?** CLA recognizes that policies developed today must drive investment. Investments in crop protection and agricultural biotechnology research and education, innovative farming methods and new technologies will meet the unique challenges faced by agriculture and consumers worldwide who rely on it.

In conclusion, modern agriculture must advance based on the use of new technologies in agricultural biotechnology and crop protection, that help us meet the grand global food security challenges. Food security through modern agriculture is critical to delivery of human health care, reduction in hunger, and increasing energy supply, all in a sustainable manner with minimal negative impact on the environment.

CLA urges the AC21 to conduct an honest analysis --any solutions must comport with both U.S. and international food security. CLA is proud of the long record of success by the science-based crop protection industry which will continue to allow not only American farmers, but consumers world-wide to share in enhanced quality of life

and health, through more affordable and sustainable supplies of food, feed, fiber, fuel and industrial products -- benefits and new opportunities offered by modern agriculture.

CLA offers our assistance as the AC21 continues to deliberate. We appreciate the opportunity to comment. If there are questions, please do not hesitate to contact me (202-833 4474; bglenn@croplifeamerica.org).

Sincerely,

A handwritten signature in black ink that reads "Barbara P. Glenn". The signature is written in a cursive, flowing style.

Barbara P. Glenn, Ph.D.
Vice President
Science & Regulatory Affairs