

The Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

January 10, 2020

RE: Proposed Rule –Doc. No. APHIS–2018–0034 (84 Fed. Reg. 26514) (June 6, 2019)

On behalf of the farmers, ranchers, cooperatives, technology developers, scientists and seed companies represented by the organizations signed below, we appreciate the opportunity to provide our input to the Office of Management and Budget on the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service's (APHIS) proposed "Movement of Certain Genetically Engineered Organisms" or "SECURE" rule, Docket Number, APHIS-2018-0034. Our groups represent a significant amount of agriculture interests in the United States. Our associations and stakeholders strongly support the intent of APHIS to create a system which fosters innovation and recognizes the long and safe track record of genetically engineered (GE) plant breeding technologies. We applaud APHIS for engaging with stakeholders to develop a rule that can be responsive to the ongoing development of new technologies which have the potential to bring incredible advances in plant breeding.

During the comment period, many of the signatories of this letter submitted separate comments that detailed specific recommendations as they pertained to individual stakeholder needs. The purpose of this letter is to express our unified support on two key areas. First, we support USDA's intention to publish a final rule in the first quarter of 2020. It is our hope that the swift completion of a final rule, as intended by APHIS, will continue to advance the position of the United States as the global leader in the development of biotechnology. Second, our associations believe that providing legal certainty through interagency coordination between USDA, the Environmental Protection Agency and the Food and Drug Administration will encourage the continued domestic and global adoption of new GE traits, provide transparency in domestic and international markets, enhance harmonization of global trait approvals and facilitate certainty in the development of new gene edited plant varieties.

Sincerely,

American Farm Bureau Federation  
American Seed Trade Association  
American Soybean Association  
American Sugarbeet Growers Association  
Biotechnology Innovation Organization  
Crop Science Society of America  
National Association of State Departments of Agriculture  
National Corn Growers Association  
National Cotton Council  
National Council of Farmer Cooperatives  
National Sorghum Producers  
U.S. Beet Sugar Association