



Idaho Grain Producers Association

821 West State Street
Boise, Idaho 83702-5832

O: (208) 345-0706

F: (208) 345-6760

www.idahograin.org

April 20, 2016

Docket No. APHIS-2014-0054
Regulatory Analysis and Development
Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

RE: Environmental Impact Statement; Introduction of Products of Biotechnology

The Idaho Grain Producers Association (IGPA) is pleased to offer the following comments with regard to Docket ID APHIS-2014-0054, Environmental Impact Statements; Introduction of the Products of Biotechnology. With over 600 wheat and barley farm families as members, IGPA is the key policy advocacy organization working on behalf of Idaho's grain industry with local, state, and federal leaders.

1. We ask APHIS to keep gene editing biotechnology that modifies native DNA in the target host unregulated under 7 CFR Part 340.
2. We request that APHIS allow plants developed using "low risk" techniques, such as gene editing, to be commercialized without further oversight.
3. We urge APHIS to use science-based information to make decisions that update biotechnology regulations.
4. APHIS should consider the environmental and health benefits of plant products developed using "low risk" biotechnology as they develop regulatory rules.
5. APHIS needs to streamline regulations to develop an efficient, clear, low-cost pathway through evaluation and approval for regulated plant products.
6. APHIS should also take into account the views and responsibilities of the Food and Drug Administration and the Environmental Protection Agency in regulating biotech products to ensure ongoing and improved communication.
7. Finally, APHIS must consider the potential impact of changes in its policies on the international as well as the domestic regulatory and commercial environment for biotech products.

IGPA appreciates the opportunity to submit comments on this important issue – if you have questions or require additional information, please do not hesitate to let us know.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stacey Satterlee', is displayed on a light gray background.

Stacey Satterlee
Executive Director
Idaho Grain Producers Association