



November 2, 2012

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

The Honorable Collin Peterson  
Ranking Member  
House Committee on Agriculture  
1301 Longworth House Office Building  
Washington, DC 20515

Dear Chairman Lucas and Ranking Member Peterson:

The Center for Science in the Public Interest (“CSPI”)<sup>1</sup> opposes proposed changes (Section 10011-10014 of the Federal Agricultural Reform and Risk Management Act of 2012 [the “Farm Bill”]) to the oversight of genetically engineered (“GE”) crops. While the current federal regulation of GE crops needs significant improvement, the changes would severely limit the environmental analysis conducted on those crops, risking harmful impacts that might otherwise be eliminated or managed.

CSPI has stated that the current engineered crops grown in the United States are safe to eat and that with effective oversight their environmental impacts can be managed safely. We have supported the benefits that farmers, both those growing and those not growing GE crops, receive as well as the benefits that accrue to the environment. However, we have criticized the inadequate regulation of those crops by the U.S. Department of Agriculture, the Food and Drug Administration, and the Environmental Protection Agency, as well as biotechnology crop developers’ attempts to eliminate or minimize any independent government oversight of their products’ safety.

The current regulatory process at USDA is too slow and does not necessarily focus on the most important potential risks. USDA’s regulation is based on the premise that engineered crops could become potential “plant pests,” but no reputable scientist believes adding one new gene to a corn variety could turn that crop into a plant pest. The solution is not to limit USDA’s current review process primarily to its assessment of the crop’s “plant pest” potential, which could be the impact of the proposed amendments. Instead, Congress should write legislation that would give USDA explicit authority to regulate GE crops and the potential risks they could pose, such as the

---

<sup>1</sup> CSPI is a nonprofit education and advocacy organization that focuses on improving the safety and nutritional quality of our food supply. CSPI seeks to promote health through educating the public about nutrition; it represents citizens’ interests before legislative, regulatory, and judicial bodies; and it works to ensure advances in science are used for the public good. CSPI is supported by the 850,000 member-subscribers to its Nutrition Action Healthletter and by foundation grants. CSPI receives no funding from industry or the federal government.



development of resistant populations of weeds and insects or the impact of gene flow to weedy relatives.

The proposed amendments specifically stop USDA or any other agency from conducting a thorough environmental assessment or environmental impact statement as required under the National Environmental Policy Act or any other existing legislation that was passed by Congress to safeguard our environment. In addition, the proposed amendments would set deadlines that could allow the commercialization of numerous GE crops before USDA completed its environmental analysis or had the opportunity to obtain, review, and respond to comments from the public about a crop's potential impacts. With a technology that is controversial among not only the general public but within the agricultural community, USDA and other regulatory agencies must conduct efficient and thorough safety evaluations for all issues, including environmental impacts, and consider all public comments before finalizing any regulatory decisions.

We urge you and your colleagues in the House of Representatives to eliminate those provisions from the current Farm Bill. Instead, the Agriculture Committee should work with all interested stakeholders to develop stand-alone legislation that addressed the full range of issues that would improve the federal government's regulation of GE crops.

If you have any questions about these comments or would like additional information about CSPI's Biotechnology Project, I can be reached at 202-777-8369.

Sincerely,



Gregory Jaffe

Director, Biotechnology Project

cc: Members, House of Representatives