

NEAL P. DUNN, MD
2ND DISTRICT, FLORIDA

COMMITTEE ON AGRICULTURE
COMMITTEE ON VETERANS' AFFAIRS
COMMITTEE ON SCIENCE,
SPACE, AND TECHNOLOGY

Congress of the United States
House of Representatives
Washington, DC 20515-0902

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October 17, 2017

Secretary Sonny Perdue
Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20004

Commissioner Scott Gottlieb
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Secretary Perdue, Administrator Pruitt, and Commissioner Gottlieb,

Advances in agricultural biotechnology provide enormous potential to address some of society's most difficult challenges. Biotechnology and emerging technologies such as gene editing can enhance environmental stewardship, help manage pests and diseases like Zika and citrus greening, and aid in the reduction of hunger, food waste, and nutritional insufficiencies. It is vital, however, that these tools have a consistent, science-based, risk-proportionate regulatory system, and that we remove any unnecessary burdens that would inhibit the use of these innovative solutions.

As your agencies continue to engage in the Interagency Taskforce on Agriculture and Rural Prosperity and explore other regulatory improvement opportunities, we believe there are several recent biotechnology regulatory efforts that warrant your attention. On January 19, 2017, the U.S. Department of Agriculture's (USDA) Animal Plant and Health Inspection Service (APHIS) published a draft revision to its Part 340 biotechnology regulations. The U.S. Food and Drug Administration (FDA) proposed expanding the scope of its guidance for industry (GFI) #187 to regulate any animal intentionally altered using gene editing techniques as a new animal drug. While we appreciate the thoughtful, science-based direction USDA offers on products of biotechnology and gene editing that APHIS has ample experience regulating, we are concerned that these drafts offer deeply conflicting regulatory approaches. Moreover, we do not believe they provide the consistent, appropriate system needed to promote the development of these innovative tools.

These contradictory proposals have sent inconsistent signals to our trade partners, who are in the midst of determining their own approaches to these technologies. We are concerned that if the Administration does not quickly develop a uniform position on biotechnology in agriculture, including gene editing, we will see an unworkable patchwork of international regulations emerge that will effectively further suppress American innovation and the solutions that come with it.

We urge you to coordinate with each other and stakeholders to improve these regulatory proposals in ways that are consistent and foster innovation. We also request that you increase engagement with our trading partners to promote a harmonized, science-based international regulatory system for these products. Finally, as you consider ways to engage with the public to discuss the continued advancement of biotechnology in agriculture, recall that Congress provided \$3 million in FY17 for FDA and USDA for these purposes, which would aid engagement efforts.

We appreciate your work and attention to this critical issue, and stand ready to assist you in efforts to improve the regulatory climate so that our economy and society may benefit from these promising technologies.

Sincerely,



Neal P. Dunn, M.D.



Jimmy Panetta



K. Michael Conaway



Collin C. Peterson



Glenn 'GT' Thompson



Bob Goodlatte



Frank D. Lucas



Steve King



Mike Rogers



Bob Gibbs



Austin Scott



Rick Crawford



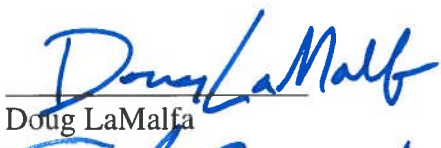
Scott DesJarlais



Vicky Hartzler



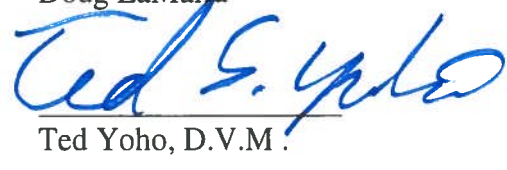
Jeff Denham



Doug LaMalfa



Rodney Davis



Ted Yoho, D.V.M.



Rick Allen



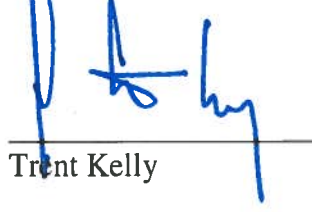
Mike Bost



David Rouzer



Ralph Abraham



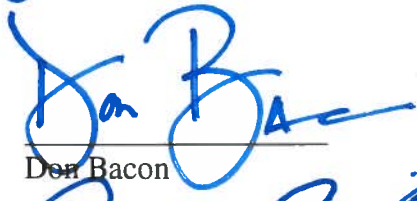
Trent Kelly



James Comer



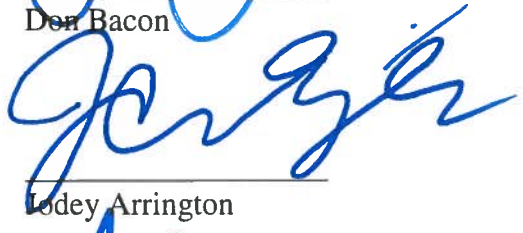
Roger Marshall, M.D.



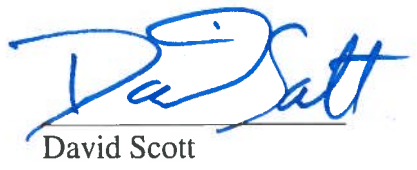
Don Bacon



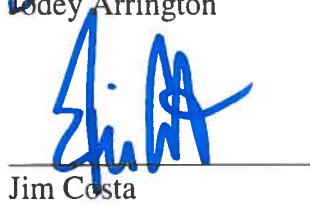
John Faso



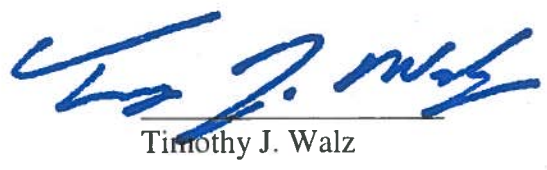
Lodey Arrington



David Scott



Jim Costa



Timothy J. Walz



Filemon Vela

Michelle Lujan Grisham

Michelle Lujan Grisham

Ann Kuster

Ann Kuster

Rick Nolan

Rick Nolan

Cheri Bustos

Cheri Bustos

Alma Adams

Alma Adams

Dwight Evans

Dwight Evans

Al Lawson, Jr.

Al Lawson, Jr.

Tom O'Halleran

Tom O'Halleran

Darren Soto

Darren Soto

Lisa Blunt Rochester

Lisa Blunt Rochester

Rod Blum

Rod Blum

Susan W. Brooks

Susan W. Brooks

Julia Brownley

Julia Brownley

Bradley Byrne

Bradley Byrne

Matt Cartwright

Matt Cartwright

Kevin Cramer

Kevin Cramer

Charlie Crist

Charlie Crist

Ron Estes

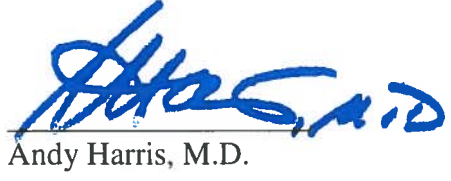
Ron Estes


John Garamendi



Vicente Gonzalez



Paul Gosar, D.D.S.

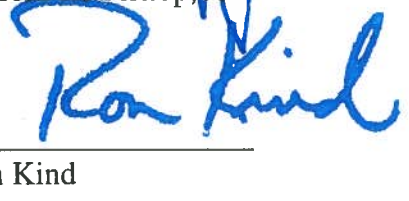

H. Morgan Griffith


Andy Harris, M.D.

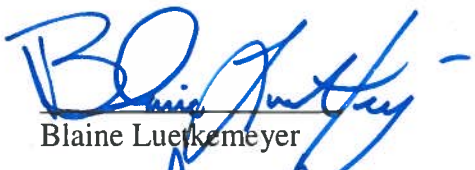

George Holding

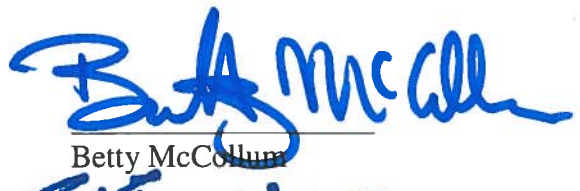

Sanford D. Bishop, Jr.

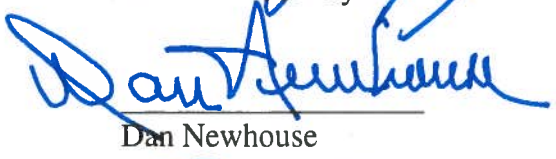

Lynn Jenkins

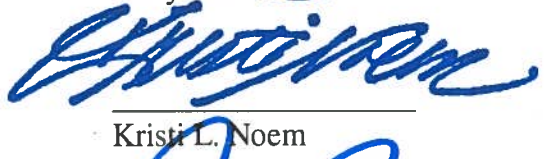

Ron Kind

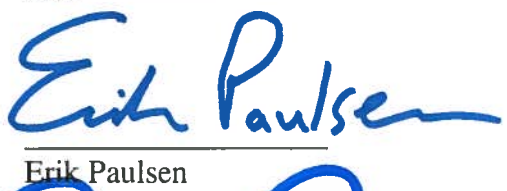

Mia B. Love

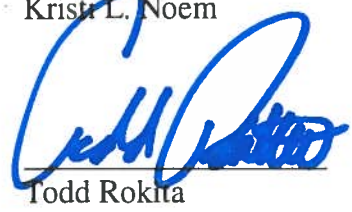

Blaine Luetkemeyer

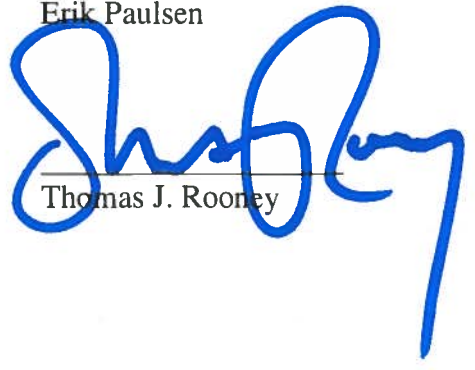

Betty McCollum


Dan Newhouse


Kristi L. Noem


Erik Paulsen


Todd Rokita


Thomas J. Rooney


Kurt Schrader

Dave Loeb sack

Dave Loeb sack

Kyrsten Sinema

Kyrsten Sinema

Adrian Smith

Adrian Smith

Ann Wagner

Ann Wagner

David Young

David Young

Sean Patrick Maloney

Sean Patrick Maloney

Tom Emmer

Tom Emmer

Terri Sewell

Terri A. Sewell

David G. Valadao

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Kevin Yoder

Kevin Yoder

Michael K. Simpson

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