



Submitted via Federal eRulemaking Portal

December 13, 2015

Dr. Michael Schechtman
Designated Federal Official
U.S. Department of Agriculture
1400 Independence Ave, SW
Washington, DC 20250

Re: **Federal Register Notice: USDA-2015-29540** (*Notice of the Advisory Committee on Biotechnology and 21st Century Agriculture*)

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to submit the following comments to the U.S. Department of Agriculture (USDA) Agricultural Research Service (ARS) Advisory Committee on Biotechnology and 21st Century Agriculture (AC21). NASDA further appreciates the participation and leadership of Commissioner Doug Goehring (North Dakota Department of Agriculture) and Secretary Russell Redding (Pennsylvania Department of Agriculture) on the AC21 Advisory Committee.

I. About NASDA

NASDA represents the Commissioners, Secretaries, and Directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs including food safety, combating the spread of disease, and fostering the economic vitality of our rural communities.

In forty-three states and Puerto Rico, the state department of agriculture is the lead state agency responsible for the regulation of pesticide use under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and in forty-seven states the Seed Control official resides within the state department of agriculture.

II. General Comments

Whether food is grown conventionally, organically, or is the product of genetic engineering, NASDA members advocate for farmers and ranchers across the full scope of agriculture, and NASDA members strive to develop, foster, and assist market channels where producers can market their commodities irrespective of production methods.

Every production method provides key market opportunities for U.S. farmers and are critical to the long-term viability of our rural communities. Not only does NASDA support efforts to increase the economic growth of the organic industry, but we also understand the significant quality of life enhancements that genetically engineered products, both medicinal and food-based, can provide.

Earlier this year, NASDA submitted three documents to the Stakeholder Workshop on Coexistence for consideration by workshop attendees. These documents were established as part of three stakeholder workshops held in 2005 and 2006 on peaceful coexistence by NASDA and the Pew Initiative on Food and Biotechnology:

1. Peaceful Coexistence among Growers of: Genetically Engineered, Conventional, and Organic Crops (2006). *Pew Initiative on Food and Biotechnology, Washington, DC.*
2. Opportunities and Challenges: State & Federal Coordinated Framework Governing Agricultural Biotechnology (2006). *Pew Initiative on Food and Biotechnology, Washington, DC.*
3. Agricultural Biotechnology Information Disclosure: Accommodating Conflicting Interests within Public Access Norm (2006). *Pew Initiative on Food and Biotechnology, Washington, DC.*

NASDA is pleased to provide additional information and background on these documents to USDA and the AC21 Advisory Committee upon request.

III. State Managed Pollinator Protection Plans are Proven Models for Success

We recommend USDA and the AC21 Advisory Committee consider the state Managed Pollinator Protection Plans (MP3) model as a vehicle to address the various challenges around coexistence issues and to ensure informed and workable solutions are developed and implemented through public-private partnerships at the state level to achieve sound policy initiatives.

NASDA members, individually and collectively, have been actively engaged in leading various initiatives to address the numerous and complex issues impacting honey bee health through the development and implementation of state MP3s.

The complexity in evaluating and addressing the multitude of these factors does not lend itself to a single, uniform solution that will successfully address all of these variables across the diverse and robust agricultural community in all fifty states and four territories. Alternatively, a state-by-state approach utilizing the state departments of agriculture as the vehicle to unify, discuss, and develop best management plans has resulted in a productive and synergetic relationship between beekeepers, growers, applicators, and other agricultural stakeholders.

MP3s are built on robust communication efforts, Best Management Plans (BMP), and Integrated Pest Management (IPM) programs specifically crafted to serve and support local agricultural practices and

producers, and this model is already a proven formula in a number of states (California¹, Colorado², Florida³, Mississippi⁴, and North Dakota⁵).

In the *National Strategy to Promote the Health of Honey Bees and Other Pollinators*⁶ the White House identified the MP3 model as a successful, non-regulatory vehicle to achieve risk mitigation and enhanced collaboration across the agricultural stakeholder community, and NASDA sees great value and potential in this model to addressing the various issues and challenges within the coexistence framework.

IV. Conclusion

NASDA members have been developing partnerships on the state level to bring forward solutions to a broad range of issues and challenges, and the MP3 model has proven especially effective in ensuring beekeepers, growers, applicators, and other agricultural stakeholders are able to continue to produce our nation's food, fiber, and fuel in a collaborative and productive manner.

We recommend USDA collaborate with the state departments of agriculture and the agricultural stakeholder community to incorporate the MP3 model as a vehicle to address the various challenges around coexistence issues, cultivate public-private partnerships, and drive informed science-based solutions. NASDA stands ready to continue to work with the AC21 and our federal partners in this effort.

Thank you for your consideration, and we appreciate this opportunity for comment. Please let us know if you have any questions or would like any additional information.

Sincerely,



Barbara P. Glenn, Ph.D.
Chief Executive Officer
NASDA

¹ California Department of Food and Agriculture. 2014. Bee and Beehive Information. <http://www.cdfa.ca.gov/plant/pollinators/index.html>

² Colorado Environmental Pesticide Education Program. Pollinator Protection 2013. <http://www.cepep.colostate.edu/Pollinator%20Protection/index.html>

³ Florida Department of Agriculture and Consumer Services. 2014. Florida Bee Protection. <http://www.freshfromflorida.com/Divisions-Offices/Agricultural-Environmental-Services/Consumer-Resources/Florida-Bee-Protection>

⁴ Mississippi Honeybee Stewardship Program. 2014. http://www.msfb.org/public_policy/Resource%20pdfs/Bee%20Brochure.pdf

⁵ North Dakota Department of Agriculture. 2014. North Dakota Pollinator Plan. A North Dakota Department of Agriculture Publication. <http://www.nd.gov/ndda/files/resource/NorthDakotaPollinatorPlan2014.pdf>

⁶ White House. (2015). National Strategy to Promote the Health of Honey Bees and Other Pollinators. Retrieved from: <https://www.whitehouse.gov/sites/default/files/microsites/ostp/Pollinator%20Health%20Strategy%202015.pdf>