

## **Advisory Committee on Biotechnology and 21<sup>st</sup> Century Agriculture (AC21)**

### **AC21 Guidance subgroup meeting**

**January 12, 2016**

#### **Conference Call Summary**

A telephone meeting of the Guidance ad hoc subgroup was held on January 12, 2016. The official members of the subgroup are Mary-Howell Martens, Paul Anderson, Gregory Jaffe, Alan Kemper, Darren Ihnen, Lynn Clarkson, and Angela Olsen. All members participated in the conference call except Mr. Kemper and Mr. Ihnen, and ex officio member Julia Doherty also participated. Michael Schechtman, AC21 Executive Secretary and Designated Federal Official, convened the call.

The first question addressed was whether the proposed charge of the subgroup was appropriate. Participants felt the charge was appropriate for the work. There was discussion about availability of existing guidance documents and whether the intent was guidance to help farmers grow their crops and work with their neighbors or prescriptive practices. The general view was that the intent was guidance. Mr. Kemper indicated that he would check whether any of the farm groups in which he participates has developed any guidance documents for members growing identity-preserved (IP) crops.

Then the question about the scope of discussions in the guidance was raised. There were differing views, with some participants favoring a narrow focus on preventing adventitious presence, others favoring broadening to include all topics relevant to all IP production, and others favoring broadening the discussion to include mitigation topics that would engage all farmers. Some members thought that the effort to incentivize participation of all farmers should be left to another subgroup, but there was no consensus on which that might be. Michael Schechtman indicated that because there was no consensus on scope, the topic should be discussed in the full committee at the next meeting. The subgroup could still work on the framework for guidance and then decide how much additional information is required.

There was considerable discussion of the level of detail to be provided in the guidance. Members acknowledged that there needed to be enough detail to be useful, but most felt that generalizable concepts, rather than locally specific information, should be presented. The question of how much specificity to include in terms of size of buffer rows for particular crops and their configuration was not resolved. It was also felt that the guidance needs to address crops with new functional traits as well as other GE and non-GE crops. One subgroup member, Mr. Clarkson, offered to track down existing publicly-available guidance on IP production from industry, including seed producers and others (e.g., Frito-Lay and Kraft) who contract for tightly controlled IP products. There was a question of whether or not the specific details of the guidance were best fleshed out by this group or left to USDA or academics to fill in. Michael Schechtman offered that the committee could choose to

make a recommendation that USDA collect and organize specified bits of information. One member expressed the view that the guidance ought to explain to farmers what existing standards are and suggest what they might do to meet them. The view was expressed that there is existing guidance available, but in piecemeal form, and that the guidance often lacks enough specificity. For example, one cited guidance document advises IP producers to know what their neighbors are planting, but doesn't explain what to do with that information.

Michael Schechtman observed that, apart from the question of the level of detail on buffer rows for particular crops, there seemed to be little disagreement about what to include in the guidance document to aid IP production, and a decision on that question could be left until later. Members also felt that the guidance should empower local solutions and should contain a framework of considerations and decision trees that could be used by farmers as well as talking points for neighbor-to-neighbor conversations. The document would also need background and context, perhaps including some basic principles, to explain why it was developed and how it might be used. One member felt that the document should also include discussion of methods that have worked and others that have not, and a rationale for why each had the result it did.

In order to begin fleshing out the guidance document, two subgroup members, Angela Olsen and Lynn Clarkson, agreed to separately work on a guidance framework, and to provide it to the subgroup by the last week in January. They would also seek input from the American Seed Trade Association, the American Farm Bureau Federation, and the Association of Official Seed Certifying Agencies. A second, separate track, on conversations with neighbors, will need separate attention. Mr. Clarkson indicated that he would also provide the information he was gathering on industry procedures by that date. The next subgroup conference call will enable identification of shared considerations from all these materials and the start of efforts to construct decision trees.

The question was raised as to whether a researcher on the economics of coexistence, Dr. Nicholas Kalaitzondonakes, who spoke to the AC21 some years back, might also have some relevant information which was previously unpublished. Dr. Schechtman agreed to reach out to him and inquire.

It was agreed that the second part of the charge, talking with neighbors and what to talk to them about, would be another topic for the next conference call. Michael Schechtman indicated that he would try to come up with some questions to help stimulate that discussion.

*Tasks given:*

- Lynn Clarkson to gather industry data on IP procedures by final week of January 2016.

- Lynn Clarkson and Angela Olsen to develop initial draft guidance frameworks, with input if possible from key farming organizations, by final week of January 2016.
- Michael Schechtman to reach out to Dr. Kalaitzandonakes on relevant information he might be willing to provide.
- Next conference call agenda to include guidance discussion and discussion of information for neighbor-to neighbor discussions.