

Update to the Coordinated Framework

Matt Enrico Baur <mebaur@ucanr.edu>

Fri 2/17/2023 2:52 PM

To: Bodnar, Anastasia - OCE-OPMP, Washington, DC <Anastasia.Bodnar@usda.gov>;biotech-regulation@ostp.eop.gov <biotech-regulation@ostp.eop.gov>

Cc: Arnold, Elyssa - OCE, Washington, DC <Elyssa.Arnold@usda.gov>

Anastasia,

Thanks very much for presenting yesterday and getting me up-to-speed on this. I have been focused on other regulatory issues and I lost sight of this one.

Although the deadline for submitting comments was Feb 1, 2023, I am hoping you might consider my comments below. My comments are focused mostly on Questions 1 & 7 in the FR notice.

To Question 1: The U.S. Regulatory system governing biotechnology products focused on agriculture and especially pest management products like PIPs and transgenic plants expressing bacterial proteins that confer resistance to insects or plant incorporated traits that confer herbicide resistance is fairly predictable and not a source of tremendous uncertainty in the industry. The level of certainty in the U.S. regulatory system allows regulatory managers in the private sector to predict product timelines with a high degree of confidence. Where the real uncertainties lie are in the foreign regulatory systems and processes. The regulatory environment in Europe and Asia are often greater sources of uncertainty and these uncertainties affect the ability to predict timelines.

To Question 7: We, at the Center believe, a priority issue should be the re-establishment of trust between the regulated and the regulator. Public trust in government regulatory agencies has eroded significantly, in part through the active demonization of these agencies by regulated entities and also by political interests. For these agencies to effectively perform their important functions, the public needs to be reminded of the critical role they play in protecting the health of our citizens and lands. But how to do this? The center funds working groups that actively support dialogue to develop strong relationships between groups often with differing views on how to solve a problem. We would welcome the opportunity to support working groups that bring together parties with widely differing views on the use of biotechnology in Agriculture for pest management to discuss the issue and what steps we need to take to assure confidence in the safety of these products.

Thank you for considering these comments and please don't hesitate to reach out with questions-

Matt

Matthew Baur
Director - Western Integrated Pest Management Center
Coordinator – Office of Pesticide Information and Coordination
2801 Second Street
Davis, CA 95618
(O) 530-750-1271
(C) 530-746-1072
mebaur@ucanr.edu