

NCGA Position

Title: Biotechnology
Position Number: I-A-1

Date: 7/07
Expires: 3/09

Background: The development of biotechnology offers great promise for society. Biotechnology offers corn growers improved efficiencies and potential profits when managed wisely and with regulatory oversight based on sound science. The proliferation of biotech corn is redefining current systems of price discovery, consumer information, health regulation and trade management. Worldwide consumer acceptance of biotechnology will increase with the dissemination of science-based information. Responsible and accountable management by biotechnology providers, producers, suppliers, and grain merchandisers is imperative. We must address our customers' concerns and protect our traditional markets.

Resolution/position:

1. Demand technology providers to fully engage all regulatory options and stewardship practices for biotech events.
2. Support trade negotiations including the specific objective of regulatory synchronization and mutual acceptance of biotech agricultural products.
3. Support the development of internationally accepted, science-based and consistent Adventitious Presence policy.
4. Support the commercial release of biotech corn events or combination of events subsequent to consultation with and approval by the NCGA Biotech Working Group. These events must also receive full approval by the relevant U.S. and Japanese regulatory agencies and the product registrant must be aggressively pursuing approval in every country or bloc that requires approval prior to importation of corn, corn products, or food containing corn ingredients.
5. NCGA respects Japan's regulatory approval process regarding new traits. Realizing the importance of world trade, NCGA expects industry to be sensitive and adhere to all aspects of the regulatory approval process.

BWG will monitor and review each company's product development and distribution plan for seed prior to commercial release.

In the United States, distribution of seed to producers for planting is legally permissible when the product has received full U.S. regulatory approval, yet has not received full approval in Japan. In order to make traits available to growers, the technology providers will be expected to work with the BWG under this policy to minimize risk to corn export markets.

The following are requirements of our policy:

- Full Japanese approval must be expected by May 1, of the year seed is released.
- Each technology provider will report to the NCGA Biotech Working Group, by December 1, their unapproved events that could receive full U.S. regulatory approval and result in planting for the upcoming season in the United States.
- Product release in prohibited market areas must be avoided.
- The technology provider must have a valid plan, reviewed by the BWG, which includes multiple layers of oversight to prevent accidental release into prohibited markets.

- The technology provider must have a valid plan to identify, locate, and recover accidentally released product and repair financial damages caused by the release.
 - Producer/Growers must be held contractually immune from liability related of non-approved technology if they have fulfilled requirements for growing the product as determined by the provider.
6. Recognizing the importance of every customer of U.S. corn and corn products, NCGA will insist that every product registrant conducts due diligence in bringing products to market in a manner that does not disrupt domestic or international trade. Every product registrant will initiate discussions with biotech providers and end users to develop a certified marketing system that assures all events and products will reach appropriate markets.
 7. Encourage the mediation and resolution of biotech issues in a manner, which limits disruption of domestic and international corn marketing.
 8. Support the release of biotech corn that is intended for a specific end use and that has limited regulatory approval only through closed marketing systems or carefully conceived identity preservation systems that secure our ability to market corn and corn products worldwide.
 9. Request that biotechnology providers assure the availability of accurate, affordable, timely tests to detect the presence of each biotech event. Tests must be available prior to the marketing of new biotech events.
 10. Marketing of new biotech events by the seed industry that does not have worldwide approval must be focused in areas that do not jeopardize the export of commodity corn and commodity products.
 - Encourage improvement of existing grain channeling systems, including training.
 11. Support widespread promulgation by seed retailers of event specific export approval status and management guidelines to enable growers to immediately determine which events are currently approved and how to channel those which have export restrictions.
 12. Require the seed industry to clearly label and identify the approval status of all events and to augment this effort with an aggressive communications program targeting grower customers (including advertising and sales of corn seed).
 13. Encourage the Environmental Protection Agency (EPA), registrants and the research community to work closely with producers to develop resistance management strategies that are workable for producers.
 14. We support continued compliance with the current refuge requirement for raising Bt corn in non-cotton producing areas. We support a scientific review of current refuge requirements including a possible reduction. Corn Grower members should encourage our neighbors and seed corn dealers to observe this requirement.
 15. Require the seed industry to aggressively promote Insect Resistance Management (IRM) in their seed sales strategy.
 16. Support Grain Inspection, Packers and Stockyards Administration (GIPSA) efforts to develop merchandising and process verification standards for goods that do not contain biotech corn.

17. Support Food and Drug Administration's efforts to provide guidance for voluntary labeling that indicates whether foods have or have not been developed using bioengineering to identify attributes that are important to consumers in a manner that is truthful and not misleading.
18. Promote the positive contributions of biotechnology as it relates to human and animal health, the environment, grain quality, and production benefits.
19. Support public funding of land grant institutions to disseminate information, science, etc. about biotech.
20. Encourage biotech providers to avoid the use of antibiotic resistant markers.
21. Request seed companies make available at no charge, upon request, the percent of transgenic purity of seed.
22. Insist that all corn seed has been tested for the presence of Cry9C.
23. Support establishing a science-based threshold for commingled StarLink corn.
24. Technology agreements should indemnify producers from liability once they follow regulations and guidelines provided by the biotech provider and seed companies.
25. The strict enforcement of science-based isolation and containment requirements for the research, production, and processing of all crops that are not approved for food and feed use in the United States in order to protect the commercial grain industry and food supply is imperative.
26. For approved biotech events, the seed industry must maintain regulatory approvals for use until the trait is reasonably out of the commercial corn supply or is universally accepted with generally regarded as safe (GRAS) status.
27. Support lowering refuge requirements for Bt corn grown in cotton producing areas to that of corn grown in non-cotton producing areas.
28. Work with federal agencies to develop an educational package to ensure producers are educated in proper biotech stewardship.
29. We support a science-based analysis and continued research of Genetic Use Restriction Technologies in corn.
30. NCGA should encourage uniform seed regulation legislation.

NCGA Position

Title: Plant Derived Biologics (PDBs)
Position Number: I-A-2

Date: 7/07
Expires: 3/09

Background: We believe that there is long-term opportunity for farmers to grow value-added products derived from biotechnology and extracted from plants. Pursuit of this new technology platform holds great promise for society. NCGA will continue to work responsibly to position growers to capture value from these new products while ensuring the safety of the food supply.

Some biotechnology products require extensive management. Trained and certified growers must have the skills and ability necessary to produce these crops with proper audits. Containment and isolation of PDBs are critical issues that must be resolved in order to protect traditional markets, and realize the promise of this technology.

Supports the following:

1. Federal policy should allow the opportunity to develop and grow these new products based upon scientific risk assessment(s).
2. Each class of compounds should be grown and handled based on the scientific risk assessment.
3. Each class of compounds should have specific requirements for regulatory approval.
4. We agree the following requirements should be followed when growing PDBs:
 - a) Isolation from commodity corn through the use of:
 - i. Non-transgenic pollen or male sterile corn;
 - ii. Dedicated production systems;
 - iii. Third party verification;
 - iv. A process that ensures plants containing an unapproved trait be 100% detasseled;
 - v. A fallow system where appropriate;
 - vi. Temporal separation by using growing degree-days; and
 - vii. The development of technology protection systems in all pharmaceutical and industrial enzyme corn.
 - b) A grower training, testing and auditing program to implement standard operating procedures.
5. Recommend a review of the following procedures used by the PDB industry for:
 - a) Seed production and handling;
 - b) Grain production and handling; and
 - c) Utilization and handling of by products.