



December 6, 2010

Docket No. APHIS–2010–0047  
Regulatory Analysis and Development, PPD  
APHIS, Station 3A–03.8,  
4700 River Road Unit 118  
Riverdale, MD 20737–1238

**Re: Comments regarding Docket No. APHIS–2010–0047**

Dear Sir or Madam:

The National Association of Wheat Growers (NAWG) and U.S. Wheat Associates (U.S. Wheat) are pleased to submit these comments on the “Monsanto KWS SAAT AG; Availability of an Environmental Assessment for Supplemental Request for Partial Deregulation of Sugar Beets Genetically Engineered To Be Tolerant to the Herbicide Glyphosate.” *75 Fed. Reg. 679455* (November 4, 2010).

Collectively, NAWG and U.S. Wheat Associates work to represent the needs and interests of wheat producers who farm more than 55 million acres of land annually. We are looking forward to having the opportunity to utilize biotechnology in wheat in the future to address critical needs in the areas of drought tolerance, nitrogen use efficiency and disease management. Maintaining a robust biotech regulatory system has an impact on the future for all growers.

NAWG and U.S. Wheat strongly support interim administrative action by USDA’s Animal and Plant Health Inspection Service (APHIS) to authorize the continued cultivation and processing of Event H7-1 glyphosate-tolerant sugarbeets (also called Roundup Ready™ sugarbeets). **We support --Alternative Three--as the specific regulatory vehicle (Draft EA, Alternatives I-III) used to allow Roundup Ready™ sugarbeets to be grown and processed into sugar during the period in which APHIS conducts an Environmental Impact Statement (EIS).** We understand that the need for APHIS to complete an EIS for Roundup Ready sugar beets is a result of a court decision. As stakeholders in the development, deregulation and commercialization of biotechnology crops, the actions taken by government agencies on these crops have a direct and indirect impact on timely access to future traits now under development for our crop. The legal precedents and administrative determinations being made on sugar beets are very important to all producers and must take into account the unique nature of the sugar beet crop and its processing industry structure.

The development of biotechnology offers great promise for society when managed wisely and with regulatory oversight based on sound science. Most troublesome to our industry are the economic and structural ramifications throughout the value chain of **re-regulating a commodity five years after deregulation. Such action dramatically impacts growers and processors of raw commodities who have made significant financial decisions and legally-binding obligations based on the utilization of new and improved technologies.**

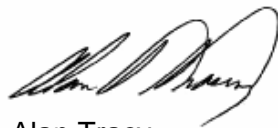
The USDA has now had a long experience with biotech crops that have been grown on 1.4 billion acres over the past 16 years in the U.S. It is estimated that more than 70 percent of the processed food products consumed in the U.S. contain an ingredient derived from plants that utilize biotechnology. The 336-page Environmental Assessment prepared by APHIS is a comprehensive evaluation of the scientific literature and the scientific and socio-economic issues raised by the growing and processing of glyphosate-resistant sugar beets. Discovery in the litigation process demonstrated that no injury has occurred in Roundup Ready sugar beet seed or root crop production or the food market while the adoption of Roundup Ready Sugar beets increased rapidly.

We are greatly concerned that actions taken by USDA may impact the ability for other crops to have access to the benefits of biotechnology in the future. Genetically-engineered, conventional and organic crops do readily coexist under far less strict standards than those that APHIS proposes in this case. We urge APHIS to promptly grant the Monsanto/KWS SAAT AG petition for partial deregulation and set forth an orderly process for cultivation until the EIS is complete. We also urge the USDA to complete the EIS in a timely and responsible manner.

Respectfully submitted,



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