



Dec. 12, 2011

Rebecca Stankiewicz Gabel, Ph.D.
Regulatory Analysis and Development
Plant Protection Division
Animal and Plant Health Inspection Service
United States Department of Agriculture
4700 River Road Unit 147
Riverdale, MD 20737-1236

Re: Docket No. APHIS–2010–0047

Dear Dr. Stankiewicz Gabel:

Please accept the following comments on behalf of the National Association of Wheat Growers (NAWG) on the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) *Draft Environmental Impact Statement-October 2011, Glyphosate Tolerant H7-1 Sugar Beets Request for Nonregulated Status*. **We strongly support APHIS's "Preferred Alternative" (Alternative 2) to fully deregulate H7-1 sugar beets** in the draft Environmental Impact Statement (EIS). Full deregulation of Roundup Ready sugar beets, which has been thoroughly reviewed and determined to be safe, is the appropriate regulatory decision and will demonstrate the U.S. government's commitment to sound science and safety as well as risk-based regulatory principles.

NAWG is a federation of 21 state wheat grower associations that works to represent the needs and interests of wheat producers before Congress and federal agencies. Based in Washington, D.C., NAWG is grower-governed and grower-funded. Wheat produced using biotechnology is not in commercial production anywhere in the world, however wheat growers support the use of biotechnology as a tool to help farmers achieve better yields and improved crop quality while reducing inputs.

The conclusions in the draft EIS reaffirm previous findings in the March 17, 2005 (docket # 04-075-2) Environmental Assessment (EA) and confirm APHIS's commitment to science-based regulation in the interest of agriculture producers, business and consumers. NAWG strongly believes growers should have the choice to plant new and safe agricultural technologies. Biotechnology is one tool that will help us address the future food needs of a rapidly growing population utilizing fewer resources. Reliable regulatory decisions are key to the development and utilization of this technology, which has been safely incorporated into billions of meals globally since 1994.

Farmers, processors and consumers should be able to count on biotech crop approvals issued by the experts in federal agencies. It is important that farmers of other crops not face the regulatory uncertainty that has been experienced by sugar beet growers since Roundup Ready sugar beets were originally deregulated in 2005. We hope that implementing continued improvements to APHIS procedures will assist USDA in constructing defensible permitting and deregulation decisions and provide the certainty that technology developers and growers need.

Thank you for consideration of our comments in support APHIS's "Preferred Alternative" (Alternative 2) to fully deregulate H7-1 sugar beets.

Sincerely,

A handwritten signature in black ink that reads "Dana Peterson". The signature is written in a cursive, flowing style.

Dana J. Peterson
Chief Executive Officer