

November 21, 2014

The Honorable Tom Vilsack
Secretary
United States Department of Agriculture
14th and Independence Ave, SW
Washington, DC 20250

Dear Mr. Secretary:

We respectfully request that you convey to the Japanese government your confidence that the genetically engineered wheat event discovered last year in Oregon was an isolated event with no impact on commercial channels and that Japan's requirement to test every shipment of U.S. wheat is no longer necessary.

The thorough investigation and report published by the Animal and Plant Health Inspection Service (APHIS) confirmed that commercial channels were not affected, even though it was unable to determine the source of the unapproved event. Additionally, Japanese and Korean testing confirms the APHIS finding by not reporting a single unapproved event in over a year of testing wheat imported from the United States.

Since Japan is the largest market for U.S wheat exports so far in MY 2014-15 and operates the largest testing program for the unapproved event, it is especially important that it bring its testing requirements into line with appropriate risk-based standards. Over 4.0 million metric tons (MMT) of U.S. wheat has been imported by Japan alone since the discovery with no findings of the trait.

Clearly, the evidence indicates that there is no reason for importers to continue testing U.S. shipments, which puts U.S. exporters at a competitive disadvantage due to increased costs and undermines efficient trade. Testing for this unapproved event – though the FDA determined it to be safe for food and feed – is therefore no longer necessary and risks becoming a trade barrier if it is not ended immediately or phased out quickly.

We thank you and APHIS for this thorough and diligent investigation. And while we wish that there had been a conclusion to the mystery of this unapproved event, we appreciate that APHIS exhausted all leads and are glad that it was an isolated incident that did not enter commercial channels.

We respectfully request that you convey to Japan your confidence that this was an isolated incident with no impact on commercial channels, and that there is no longer any real purpose to continuing these tests on all shipments. Please encourage your counterpart in Japan to consider removing the testing as soon as it is practical to do so.

Sincerely,
North American Export Grain Association
National Association of Wheat Growers
National Grain and Feed Association
U.S. Wheat Associates

cc: Under Secretary Michael Scuse
Administrator Phil Karsting