

March 2, 2018

Mr. Emmanuel F. Piñol
Department of Agriculture
Elliptical Road, Diliman
Quezon City

Email address: feedingmillions2016@gmail.com

BY EMAIL

Re: Biosafety Permits and Trade

Dear Secretary Piñol:

The undersigned organizations, representing a broad section of the U.S. food and agricultural industries, write to express the importance for regulatory predictability for timely review and approvals of biotechnology-enhanced agricultural products for import into the Philippines for food, feed or for further processing. Our concern is with the slow review and approval of these products, many of which were previously approved and are up for renewal. The Philippines is an important trading partner for the United States. U.S. farmers and supply chain partners value the long-term, mutually beneficial trading relationships we have built.

We have noticed significant and ongoing delays within the renewal and approval process for agricultural biotech products. It appears that the processing of the applications is taking considerably longer than the prescribed timeline under the Joint Departmental Circular (JDC). In fact, our understanding is that more than 30 biotech-enhanced agricultural traits are awaiting action, most of which have been delayed by more than three times longer than the JDC timeline stipulates.

Delays for biosafety renewals or approvals restrict our ability to serve the best interest of the Philippines. The cost efficiency and sustainability of production and trade of products that we supply are reduced by the lack import approvals. These prolonged delays increase the likelihood of unwarranted and costly disruptions in the vital supply chain to the local food and feed industries that rely on timely importation of U.S. agricultural commodities.

To continue to provide the Philippine industry and consumers with access to these safe, high-quality and much-needed products, we strongly encourage the Philippine government to adhere to the JDC timelines for improved timing, predictability and transparency for biotech-enhanced agricultural products.

Thank you very much for your consideration. Please let us know if you wish to discuss this issue in more detail.

Very truly yours,

National Grain and Feed Association (NGFA)
National Oilseed Processors Association (NOPA)
North American Export Grain Association (NAEGA)
U.S. Soybean Export Council (USSEC)

Cc: Dr. Segfredo R. Serrano, Undersecretary, Department of Agriculture

The **U.S. Soybean Export Council (USSEC)** is a dynamic partnership of key stakeholders representing U.S. soybean producers, processors, commodity shippers, merchandisers, allied agribusinesses and agricultural organizations. USSEC implements international market development and market access activities on behalf of the U.S. Soy Family, which is comprised of several other soy organizations such as the American Soybean Association (ASA), the United Soybean Board (USB), Qualified State Soybean Boards (QSSBs) and U.S. industry members.

National Grain and Feed Association (NGFA), established in 1896, consists of more than 1,000 grain, feed, grain processing, export and other grain-related firms that operate more than 7,000 facilities and handle more than 70 percent of the U.S. grain and oilseed crop. NGFA-member companies consist of private and publicly owned companies and farmer-owned cooperatives. Affiliated with NGFA are 34 state and regional grain, feed and agribusiness associations. NGFA also has strategic alliances with NAEGA and the Pet Food Institute.

North American Export Grain Association (NAEGA), a not-for-profit trade association established in 1912, consists of private and publicly owned companies and farmer-owned cooperatives that are involved in and provide services to the bulk grain and oilseed exporting industry. NAEGA's mission is to promote and sustain the development of commercial export of grain and oilseeds and their primary products. Through a reliance on member action and support, NAEGA acts to accomplish its mission from its office in Arlington, VA, and in markets throughout the world.

National Oilseed Processors Association (NOPA), established in 1930, assists the U.S. soybean, canola, flaxseed, sunflower seed and safflower seed processing industries to be the most competitive and efficient in the world by utilizing the combined expertise, knowledge and resources of its members to foster market- and science-based policies. NOPA represents 13 member companies that process over 1.8 billion bushels of oilseeds annually at 65 plants in 21 states.