



May 7, 2021
Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

RE: USDA on Regulation of the Movement of Animals Modified or Developed by Genetic Engineering

Introduction

Established in 1986, the National Family Farm Coalition (NFFC) is an alliance of 30 grassroots organizations representing the rights and interests of family farmers, ranchers, and fishermen across 42 states. On behalf of our members, we thank USDA for the opportunity to comment on the December 28, 2020, Federal Register (85 FR 84269-84275, Docket No. APHIS-2020-0079) proposed rulemaking (ANPR) on establishing regulations for the movement of certain animals modified or developed by genetic engineering.

Background

One of former Secretary of Agriculture (USDA) Sonny Perdue's final acts was signing the agreement to shift oversight of gene-edited livestock from the Food and Drug Administration (FDA) to the United States Department of Agriculture (USDA). At the time, the FDA Commissioner rejected the agreement "amid concerns about its legality and the potential health repercussions of relaxing oversight of certain genetically altered products"; however, Assistant Secretary for Health and Public Health Services of the Trump Administration, Admiral Brett Giroir, M.D. signed the Memorandum of Understanding (MOU).

The NFFC agrees with the Center for Food Safety's (CFS) objections to this deal, and we echo their letter directed to you on February 26, 2021, that "urges Secretary Vilsack to instruct USDA officials to remove the MoU from the APHIS website and to halt any budgetary, regulatory, organizational or personnel activities, including transfer of current regulatory submission information, to implement the MoU's provisions." (CFS, 2021)

As CFS documented on their letter, the FDA is the best agency to maintain stringent scientific evaluation of any genetically engineered (GE) product for public consumption. Former USDA Secretary Perdue's public declarations after signing the MOU and the language in the agreement reveal weakening food safety evaluation and increased consumer risk. The previous administration's interest in controlling genetically engineered animal production is not out of public safety but corporate gain.

NFFC's mission is to mobilize family farmers, ranchers, and fishermen to achieve fair prices, vibrant communities, and healthy foods free of corporate domination.



Farmers and Ranchers Oppose GE Animal Production

The advantages of GE livestock concern NFFC members for several reasons. First, these technologies are owned and operated by large corporations whose objective is fast capitalization and cheap production. Our members see this as dangerous, unlawful, and unjust competition.

Second, like what has happened with other agricultural products such as corn and soy, the altered genetic material could enter nearby non-GE genetic materials, causing even legal ramifications to any farmers living near these fields (CFS, 2005). Similar concerns exist with the possibility of transgenic pollution on animals as it was already demonstrated in the case of GE salmon (CFS, 2015).

Finally, the MOU does not take into consideration current farmers' and ranchers' traditional production, which often involves years or decades of developing livestock herds and could expand corporate domination over livestock and seafood production.

The NFFC recognizes the importance of developing GE products to prevent and treat some illnesses but rejects the Malthusian arguments that GE technology is necessary to feed a growing population. Ultimately, we remain skeptical of the claims that it is environmentally safe, commercially fair, or ethically sound.

Bibliography

Center for Food Safety, 2005, Monsanto vs. U.S. Farmers, <https://www.centerforfoodsafety.org/files/cfsmonsantovsfarmerreport11305.pdf> Last viewed on 5/7/2021

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Center for Food Safety, 2021, Letter to Secretary Vilsack Opposing Transfer of GE Animals to USDA (Docket No. APHIS–2020–0079) https://www.centerforfoodsafety.org/files/cfs-letter-to-secretary-vilsack-opposing-transfer-of-ge-animals-to-usda-final-feb-26-2021_14988.pdf Last viewed on 5/6/2021

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