

April 29, 2024

Erin Morris
Associate Administrator
Agricultural Marketing Service
US Department of Agriculture

Via Regulations.gov: AMS-FTPP-22-0080

Dear Ms. Morris,

Thank you for the opportunity to provide information in response to AMS' request for information regarding crops to be listed on AMS' Bioengineered Labeling Disclosure Rule. This submission is being made by the American Bakers Association, North American Millers Association, National Association of Wheat Growers and U.S. Wheat Associates. Contact information for the point of contact at each organization is included at the end of this submission.

To date the only BE trait in global wheat production is commonly referred to as 'HB4' which has been approved for cultivation in two countries. Argentina, where we understand that approximately 120,000 acres are grown in a closed loop system for the company which developed the trait – Bioceres Crop Solutions, and in Brazil, where although cultivation has been approved, current production doesn't extend beyond variety development and seed increase plots. As part of the closed loop system, it is our understanding that flour milled from this wheat is not exported to the U.S. Neither country is a significant supplier of wheat or wheat flour to the U.S. at this time. According to Trade Data Monitor data: Argentina supplied 103 tons of wheat flour to the US in 2023 (.03% of US market), while Brazil supplied 17 tons of wheat flour (.01% of US market). In raw wheat, Argentina supplied 15,483 tons (.63% of US market), with Brazil supplying 2 tons. Argentina wheat is most commonly imported into the US as feed wheat for poultry or swine operations in the US Southeast, rather than for human consumption.

In the U.S., as we understand, FDA has completed its review of HB4, but it is not approved by USDA for cultivation. Our organizations are concerned about the premature regulatory burden on the wheat value chain if wheat is included in the List of Bioengineered Foods given the current scenario of cultivation in a closed loop system outside the US with countries where the US has historically imported miniscule amounts of flour or wheat from. We believe it is highly unlikely that any bioengineered wheat could make it to the U.S. food supply under the current scenario. As production increases in the future, wheat should be considered for inclusion in the List of Bioengineered Foods.

We look forward to further engagement with you through this process. Should you have additional questions for any of our underlying organizations, please find points of contact below.

Sincerely,

American Bakers Association:

Rasma Zvaners, VP of Governmental Relations, RZvaners@americanbakers.org

North American Millers Association:

Molly Miller, VP of Regulatory and Technical Affairs, mmiller@namamillers.org

National Association of Wheat Growers:

Jake Westlin, VP of Policy and Communications, jwestlin@wheatworld.org

U.S. Wheat Associates:

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