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Submitted electronically via Federal eRulemaking Portal

RE: Public Comment on Availability of Petition for Determinations of Nonregulated Status of Canola Genetically Engineered for Altered Oil Profile and Resistance to an Imidazolinone Herbicide: BASF Plant Science, LP; EPA+DHA Canola Event LBFLFK; Docket ID APHIS-2018-0014

On behalf of the US Canola Association (USCA), I write to submit comments on Docket No. APHIS-2018-0014 regarding BASF Plant Science, L.P.'s Petition for Determinations of Nonregulated Status of Canola Genetically Engineered for Altered Oil Profile and Resistance to an Imidazolinone Herbicide. The USCA is a non-profit commodity organization whose mission is to increase domestic canola production to meet a growing demand for healthy oil. It promotes the establishment and maintenance of conditions favorable to growing, marketing, processing and use of U.S. canola.

The USCA has reviewed the petition and notes that the production and processing of EPA+DHA LBFLFK canola trait will take place in an Identity Preservation System (IDP) to ensure that production does not cross-pollinate or contaminate existing commercial canola production in the United States. The USCA believes the parameters of the IDP outlined in the petition should ensure physical separation of the trait from different canola lines, restricted seed sales that are not sold on the open market, commercial production under contract with delivery to the processor for crushing and refining separately from other canola products, and segregated sales to the final customer.

Given the care taken to segregate the production of this trait through an IDP system by the petitioner, the USCA supports approval of this petition.

Respectfully yours,

Robert Rynning
President, U.S. Canola Association