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*Submitted electronically via Federal eRulemaking Portal*

**RE: Public Comment on Availability of Petition for Determination of Nonregulated Status of Canola Genetically Engineered For Altered Oil Profile; Event B0050-027; Docket ID APHIS-2017-0096**

On behalf of the US Canola Association (USCA), I write to submit comments on Docket No. APHIS-2017-0096 regarding Nuseed Americas Inc. Petition for Determination of Nonregulated Status of Canola Genetically Engineered For Altered Oil Profile. 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.

We wish to provide the following comments:

1. The USCA has serious concerns with the lack of a robust stewardship program surrounding this trait. Commodity canola oil functionality could be negatively affected without robust Product Stewardship. While the petition states that gene flow, plant pest potential and weediness potential would not be a concern, there appears to be a complete lack of product segregation practices in the petition which are needed for an Identity-Preserved Trait.
2. It is also our understanding that the studies performed by the applicant in support of the petition were not done under Good Laboratory Practices (GLP). The USCA has significant concerns with the possibility of trade issues that could negatively impact the entire canola market should this trait inadvertently enter the European market since the dossier will not be allowed in Europe (Europe requires GLP).

History has shown that non-approved traits that end up in non-approved countries can and have had huge negative impacts on growers. Companies that commit to the Excellence Through Stewardship (ETS) standards must conduct studies under GLP to get the global approvals required by the program. It is our understanding that the Petitioner is not a member of ETS.

With approximately 75% of North American canola production exported in the form of seed, oil or meal, adding \$15.4 billion to the North American economy, our industry is highly dependent on uninterrupted flows of product around the world.

The canola industry has a responsibility to maintain a robust science-based regulatory approval process. Without it, there would be severe consequences for the canola industry around the world:

- Key customers would no longer be able to cite the example of science-based regulatory approvals to validate similar systems in their own countries.
- The door would be open for other countries to use non-science-based criteria to control imports.
- Uncertainty would arise regarding the security of trade.
- Investment in canola research would be at risk. In an uncertain regulatory environment, R&D dollars might be diverted into crops that are larger on a global scale.

Therefore, we request that the petitioner be required to address these inadequacies before any approval of the trait is granted.

Thank you for this opportunity to comment during the development of the new rule

Respectfully yours,

A small, rectangular image containing a handwritten signature in black ink. The signature appears to read "Robert Rynning".

Robert Rynning  
President, U.S. Canola Association