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Submitted electronically via Federal eRulemaking Portal

RE: Comment on 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's Petition for Determinations 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 as well as promote the establishment and maintenance of conditions favorable to growing, marketing, processing and use of U.S. canola.

The petition, as revised on February 26, 2018, states the production and processing of DHA canola will take place in an Identity Preservation System (IDP), as outlined in the supporting documentation titled "Nuseed DHA Canola Supply Chain & Stewardship", to ensure that production does not cross-pollinate or contaminate existing commercial canola production in the United States. Nuseed has also joined Excellence Through Stewardship® and is building its stewardship capacity as it approaches commercialization.

The USCA believes the parameters of the IDP and the stewardship practices Nuseed has undertaken will ensure (1) physical separation of the trait from different canola lines, (2) restricted seed sales that are not sold on the open market, (3) commercial production under contract with delivery to the processor for crushing and refining separately from other canola products, and (4) segregated sales to the final customer.

The revised petition and supporting documents have alleviated our previous concerns regarding the segregation of this trait's production through an IDP system, and therefore the USCA supports approval of this petition.

Respectfully yours,

Robert Rynning
President, U.S. Canola Association