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*Submitted electronically via Federal eRulemaking Portal*

**RE: Docket No. APHIS-2018-0014; BASF Plant Science, L.P.; Availability of a Draft Plant Pest Risk Assessment and Draft Environmental Assessment for Canola Genetically Engineered for Altered Oil Profile and Resistance to an Imidazolinone Herbicide**

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 by promoting the establishment and maintenance of conditions favorable to growing, marketing, processing and use of U.S. canola.

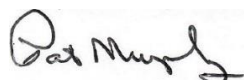
The American Heart Association states that omega-3 fatty acids provide benefits to the hearts of people who are healthy as well as those with cardiovascular disease or are at high risk of cardiovascular disease. The new EPA+DHA LBFLFK canola trait will supply a new canola oil that will provide a renewable, plant-based source of omega-3 fatty acids that is both highly sustainable and easily scalable, creating a wide range of opportunities across the global food and feed markets. Through our conversations with BASF and Cargill, who are partnering to bring this product to the market, we know the initial Omega-3 canola oil production in the U. S. will be used to provide a sustainable source of nutrients to support the aquaculture market. Refined oil from this new canola oil has the potential to be incorporated as an EPA/DHA rich ingredient in both food and beverages. Canola producers look forward to the opportunity to supply this new and needed market in the future.

Further, the USCA has reviewed this latest petition and notes the EPA+DHA LBFLFK canola trait will not be produced, imported or exported in a country until relevant regulatory authorities have verified the safety data and given their approval. Global approvals will also be obtained so that all use of the EPA+DHA LBFLFK canola products are in full compliance with international legal and trade stewardship expectations. Once approved, the production and processing of the EPA+DHA LBFLFK canola 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 as well as the positive health benefits this new EPA+DHA canola oil will provide to consumers, the USCA supports approval of this petition.

Respectfully yours,

A handwritten signature in black ink that reads "Pat Murphy". The signature is written in a cursive style with a large initial "P" and "M".

Pat Murphy  
President, U.S. Canola Association