

November 1, 2013

Ambassador Michael Froman  
United States Trade  
Representative  
600 17th Street, N.W.  
Washington, D.C. 20508

The Honorable Penny Pritzker  
Secretary of Commerce  
1401 Constitution Avenue, NW  
Washington, D.C. 20230

The Honorable Tom Vilsack  
Secretary of Agriculture  
1400 Independence Avenue, SW  
Washington, D.C. 20250

Dear Ambassador Froman and Secretaries Pritzker and Vilsack:

As you prepare for the Joint Commission on Commerce and Trade (JCCT) meeting with China scheduled for this December, the undersigned organizations are writing on behalf of U.S. farmers who depend on the approval and ability to export new biotech crops to China. We are concerned by ongoing delays, lack of transparency, and arbitrary decisions in China's biotech approval process.

Your efforts have done much to establish beneficial trade in agriculture products. China is now the largest export market for U.S. agricultural goods valued at over \$32 billion in 2012. However, in spite of our growing successful trade relationship, China's biotech approval process has gone from being slow but predictable to being even slower, unpredictable and nontransparent. Because of China's position as a major buyer of U.S. commodities, the current arbitrary Chinese approval system is effectively preventing U.S. farmers from adopting the new technologies we depend upon to increase yields, fight pests and weeds, enhance quality, and improve environmental performance. Unless the Administration and like-minded exporting countries are able to correct this situation, the Chinese government will control which seed technologies growers can access and which ones they cannot.

As of June of this year, it had been 19 months since a new soybean, corn, cotton, or canola biotech trait had been approved for import and use in China, and there were 19 soybean, corn, cotton, and canola traits waiting for final safety certificates or for approval for required local studies to be initiated. When China finally acted on this backlog of biotech approvals, it issued approvals for only 11 or 58% of the applications, while rejecting the others.

There are currently 15 biotech applications pending approval at China's Ministry of Agriculture. As detailed in the attached list, 3 of the 15 applications are for final safety certificates for new events, 7 are for approval for required local studies to be initiated on new events, and 5 are for renewals of previously approved events. The final safety certificates for new events are important so that these new technologies – some of which have been waiting for Chinese approval for years – can finally be commercialized and to prevent trade disruption. The approvals for local study are needed so that the next step in the Chinese approval process can get underway. And the renewals are important so that trade in previously authorized biotech crops can continue without abeyance. If China's Ministry of Agriculture fails to issue Biosafety Certificates and GMO Material Import Permits by December of this year, the commercialization

of seed technologies that would have benefitted U.S. farmers will be delayed by at least another year, and the opportunity to conduct local studies in the 2014 growing year will be lost.

United States and other world farmers want to help meet China's food security needs and our organizations have been working in partnership with the Chinese food, feed, livestock, and textile industries for decades. However, the ability to efficiently and consistently produce and increase production of our crops depends on commercializing new biotech traits that can increase yields, improve quality, and ultimately provide Chinese consumers with more affordable and healthy food and fiber. Ongoing delays by China in approving these new seed technologies will weaken not only Chinese food security, but that of the world as well.

As you and your staff prepare for the JCCT meeting, we urge you to make clear to your Chinese counterparts the importance of positive action on the pending approvals. We also urge that discussions on the implementation of a more timely and transparent biotech process be a top priority on the JCCT agenda.

Thank you again for your ongoing work in seeking to open new markets for U.S. agricultural products and in assuring fair and open access to existing markets. We look forward to your response and working with you on this issue.

Sincerely yours,

American Farm Bureau Federation  
American Soybean Association  
National Corn Growers Association  
U.S. Canola Association

Attachment

cc. Ambassador Isi Siddiqui, USTR  
Sharon Bomer Lauritsen, USTR  
Honorable Michael Scuse, USDA  
Honorable Darci Vetter, USDA