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July 23, 2020

Ms. Francie Tolle, Director
Product Administration and Standards Division
Risk Management Agency, USDA
PO Box 419205
Kansas City, MO 64133-6205
Submitted via: www.regulations.gov

RE: Docket ID FCIC-19-0007
Common Crop Insurance Regulations; Canola and Rapeseed Crop Insurance Provisions

Dear Director Tolle,

On behalf of the U.S. Canola Association (USCA) I want to express our support for the Canola and Rapeseed Crop Insurance Provisions that were published and effective May 28, 2020 for the 2021 and succeeding crop years. The USCA supports the intended effect of this action to clarify policy provisions and provide consistency with other crop provisions that offer coverage on both fall and spring-planted acreage of the crop.

Specifically, the USCA supports the revision of the definition of “harvest” to include “pushed” such that canola that is swathed or pushed prior to combining is not considered harvested. USCA also supports the change specifying the final planting date for counties that have only spring canola, only fall canola, or both. USCA supports the clarifications made to the cancellation and termination dates for counties with and without fall-planted types. USCA also supports the clarifications made regarding prevented planting production guarantee based on approved yield for spring-planted canola that is consistent with other crops that have both fall and spring planted acreage.

We appreciate the opportunity to provide input on these changes that affect U.S. canola growers.

Respectfully yours,

Pat Murphy
President