July 10, 2025

Ambassador Jamieson Greer
U.S. Trade Representative
Office of the U.S. Trade Representative
600 17th St., NW
Washington, DC 20508

Dear Ambassador Greer,

As groups representing millions of U.S. farmers, seed technology developers, science societies, and exporters, we strongly support the administration prioritizing agricultural biotechnology provisions in ongoing trade negotiations. For decades, biotech crops have been vital tools for improving agricultural productivity and sustainability. However, non-tariff trade barriers imposed by some trading partners continue to restrict and delay the use of these critical tools, which effectively dictate what innovations U.S. farmers can access and undermines American competitiveness in the global market. We urge you to secure durable, and enforceable solutions to these persistent challenges in trade agreements.

For decades, biotech crops have been an important tool for U.S. farmers seeking to enhance the productivity and sustainability for our food, fuel, and fiber production. Biotech crop varieties have improved yields, protected crops from pests, and offered new consumer products, among other benefits. These tools have also better enabled certain soil health practices, such as reduced tillage, which help to reduce erosion, runoff, and other environmental impacts, as well as to grow more food on less land, reducing the conversion of environmentally sensitive lands to agriculture.

While the historical benefits and future opportunities for these technologies are considerable, we are concerned some U.S. trading partners have enacted non-tariff barriers to limit their deployment and use by U.S. farmers. Some trade partners continue to maintain protracted approval processes with redundant, unscientific, or discriminatory requirements that cause years-long delays in bringing new products to market. If a product is commercialized in the United States without approvals by these foreign regulators, a detection of an unapproved crop trait in international commerce can result in U.S. exports of agricultural goods being denied or the market closing entirely to U.S. goods. These practices result in limiting modern technological solutions and market access for American farmers and disincentivizes investment in sustainable technologies. China's biotechnology approval process is uniquely designed to exploit intellectual property protections of applicants. Under existing rules, technology developers must provide genome sequencing information and live seed to conduct in-country studies within China to advance a regulatory application, a system which is ripe for forced technology transfer. In addition, developers within the United States cannot even apply for approval within China until the product has completed evaluation by U.S. regulators. This forced asynchrony within China's application process adds years of delays to the submission process for developers operating within the United States, while developers operating within China continue to advance their own research pipelines. It is vital that the intellectual property of scientists and developers be protected in any foreign approval process and that developers operating within the United States be afforded a level playing field.

Trade negotiations carried out by the U.S. government are vital to secure meaningful solutions to these challenges. Specifically, the United States should continue to urge our trade partners to reform biotech crop approval systems to be science-base, risk proportionate, timely, predictable and transparent. The proven safety record accumulated over three decades of use and the consistent safety findings confirmed by regulatory authorities around the world serve as a strong basis to press U.S. trading partners for regulatory reform for agricultural biotechnology. Negotiations should continue to eliminate unnecessary and duplicative regulatory requirements, particularly by recognizing the equivalency of safety determinations across jurisdictions. Additionally, the administration must also ensure trading partners' regulatory policies do not unnecessarily expose U.S. innovations to potential appropriation of intellectual property. Embedding strong and enforceable intellectual property rights in trade agreements is necessary to incentivize investment in innovation that benefit U.S. farmers.

Looking to the future, plant breeding innovation (PBI) like genome editing has even greater potential to improve crops to benefit farmers and consumers. Examples include enhancing nutritional qualities, decreasing food loss and waste, reducing the need for water or other inputs, and increasing disease resistance. For these products, the administration has an opportunity to align regulatory oversight to avoid complexity and unnecessary trade barriers from the start. We are encouraged that many trading partners have already established, or are developing, policies that recognize certain crops developed using PBI are conventionally equivalent and not subjected to biotech regulatory approvals. This would go far in facilitating greater use of these critical technologies. Additionally, U.S. trading partners should steer clear of establishing separate rules for a third category of genome edited products in addition to rules that already exist for conventional and biotech varieties. We urge the administration to ensure that trade agreements advance the growing global regulatory consensus that conventionally equivalent crop varieties should be subjected to the same and no more laws as conventional crops.

By obtaining these assurances in trade agreements, the administration could better enable American farmers to continue to lead the world in productivity and ensure that the benefits of agricultural innovation continue to provide consumers with sustainable, affordable food, fuel, and fiber for decades to come.

Sincerely,

2Blades
Agricultural Retailers Association
American Farm Bureau Federation
American Seed Trade Association
American Soybean Association
American Sugarbeet Growers Association
Beet Sugar Development Foundation
Crop Science Society of America
Florida Citrus Mutual
Independent Professional Seed Association
International Fresh Produce Association
National Association of State Departments of Agriculture
National Corn Growers Association

National Cotton Council
National Council of Farmer Cooperatives
National Sorghum Producers
Society for In Vitro Biology
Texas Citrus Mutual
U.S. Canola Association
U.S. Wheat Associates