

MISSOURI FARM BUREAU FEDERATION

P.O. Box 658, 701 South Country Club Drive, Jefferson City, MO 65102 / (573) 893-1400

January 30, 2018

**Review of Existing Regulatory and Information Collection Requirements;
Extension of Comment Period
Docket No. FDA-2017-N-5093-0007**

The following comments are submitted on behalf of Missouri Farm Bureau, the state's largest general farm organization.

We urge the agency to reconsider the regulation of genetically engineered animals specifically as it pertains to genome editing. We believe the draft revised guidance issued in January 2017 effectively imposes unwarranted and excessively onerous regulatory restrictions on genome editing technologies.

Federal oversight of genetic engineering technology has long been based on risk management principles developed by the Office of Science and Technology and explicitly not based on method of modification. Recommendations issued in 2016 by the National Academy of Sciences reaffirmed the scientific validity of this approach.

As researchers discover new ways to harness this technology, gene editing applications are proliferating rapidly. Gene editing has proven to be not only more affordable than older techniques, but safer and speedier. However, regulating every separate genetic alteration of every animal in the manner set forth in the draft guidance threatens to drive the cost of innovation beyond the reach of many researchers.

We recognize and appreciate the agency's oversight authority. Yet the record to date does not warrant the highly prescriptive approach articulated in the draft guidance. At stake is one of the most promising recent advances in biotechnology—one that has the potential to significantly enhance agriculture's ability to confront burgeoning global demand for food through increased productivity.

Thank you for the opportunity to comment.

Sincerely,



Blake Hurst
President