

***AgBiotech Planning Committee
50 F Street, NW, 6th Floor
Washington, DC 20001
(202) 220-0639***

June 13, 2008

Mr. Michael Arny
President
Leonardo Academy
1526 Chandler Street
Madison, WI 53711

Dear Mr. Arny:

Members of the AgBiotech Planning Committee (ABPC)¹ object to Leonardo Academy's decision to reregister the "Sustainable Agriculture Practice Standard for Food, Fiber, and Biofuel Crop Producers and Agricultural Product Handlers and Processors (SCS-001) Draft Standard for Trial Use" with the American National Standards Institute. After receiving comments from affected interests in the agricultural sector, the Leonardo Academy simply republished the original Draft Standard, apparently without taking into account the comments provided.

The Draft Standard is unreasonably broad in scope and restrictively prescriptive in many required actions. The Draft Standard implies that "sustainable" equates solely with "organic," an assertion the ABPC rejects as impractical and unscientific. The ABPC objects strongly to the exclusion of modern biotechnology in any sustainability standard. Agricultural biotechnology has improved crop yields, provides growers with additional crop protection tools and offers significant contributions to soil and water quality.

Biotechnology-derived crops account for substantial crop acreage in the United States: 97 percent of soybeans; 87 percent of cotton; 73 percent of corn; and 50 percent of papaya. Global adoption increases yearly. The research, innovation and technological developments that are occurring in the agriculture industry will result in agriculture production that is more sustainable. The standard proposed by Leonardo Academy would only weaken agricultural research and likely increase pressure on global food supplies.

While many ABPC organizations will comment regarding specific issues in the draft, collectively our groups oppose the proposed standard. In light of the harm this Draft Standard could cause U.S. agriculture, the ABPC requests that the current proposal be immediately withdrawn.

¹ The ABPC is a coalition representing farmers, food processors and manufacturers, merchandisers and biotechnology providers that support the continued availability and marketability of products derived from biotechnology.

Sincerely,

American Farm Bureau Federation
American Seed Trade Association
American Soybean Association
Biotechnology Industry Association
Corn Refiners Association
National Grain and Feed Association
National Association of Wheat Growers
National Corn Growers Association
National Cotton Council
National Oilseed Processors Association
North American Millers' Association
USA Rice Federation
US Grains Council

Cc: Mr. S. Joe Bhatia
President and CEO
The American National Standards Institute
25 West 43rd Street
4th Floor
New York, NY 10036