U.S. WHEAT ASSOCIATES

National Association of Wheat Growers

WHEAT INDUSTRY PRINCIPLES FOR BIOTECHNOLOGY COMMERCIALIZATION

The U.S. wheat industry recognizes the benefits and value which could be created within the wheat chain through the prudent application of modern biotechnology. U.S. wheat producers will support commercialization of transgenic wheat traits after thorough review and development of a commercialization plan that facilitates commercialization with minimal market disruption. We support the ability of our customers to make purchases based on their preferences for specific traits, classes, qualities, and characteristics. We will work diligently to assure that commercially achievable customer preferences are met.

The U.S. wheat industry will support commercialization of transgenic wheat traits when:

1. The technology provider initiates an informative dialogue with the USW/NAWG Wheat Breeding Innovation Committee (WBIC) prior to submitting for regulatory approvals in the U.S. This dialogue will allow our organizations to initiate education and outreach activities to both domestic and international customers, and to provide the technology provider with practical information intended to facilitate commercialization with minimal or no market disruption.

2. Regulatory approvals for food and feed use must be secured in major wheat export markets that will be affected where a functioning regulatory system exists. Major export markets are defined as those which represent at least five percent of the normal export volume of U.S. wheat, based on a five year moving average at the time a provider begins the regulatory process in the United States. In countries where there is no viable regulatory approval system, technology providers will make regulatory submissions promptly when those systems become functional.

3. Commercialization of the trait must not impair the ability of non-transgenic wheat to meet commercially recognized thresholds for the low-level presence of transgenic traits. Appropriate international tolerances for transgenic wheat in non-transgenic shipments must be established and accepted in major export markets.

4. An accurate, economical and timely trait detection test must be provided by the trait developer prior to commercialization.

5. The primary responsibility for education and outreach for new traits will remain with the technology provider. USW and NAWG will actively help seek buyer acceptance and will provide guidance, assistance and resources.

6. The technology provider must demonstrate stewardship of the technology, including education and outreach to growers to assure compliance with agronomic and grower stewardship practices specific to the trait.

7. We have examined both certified seed and point-of-delivery value capture models. While there are advantages and disadvantages of either approach, we believe the certified seed model will be most acceptable to the value chain and is the preferred approach. Investment in agricultural technology by private parties requires a return on that investment. We support the protection of intellectual property, including education about the importance of complying with seed and stewardship contract provisions and enforcement of those provisions when necessary. Technology traits should be encouraged for adaption into public wheat varieties.

Adopted November 2008, Revised January 2015, November 2018