

# **Statement of Scott Sinner**

**Partner/Owner, SB& B Foods, Inc.  
Northern Food Grade Soybean Association  
*Reading Version***

Good afternoon Members of the Advisory Committee on Biotechnology & 21<sup>st</sup> Century Agriculture. My name is Scott Sinner. I am a fifth-generation partner in both a family farming business and exporting business located in North Dakota. Thank you for the opportunity to appear before you today to provide my views concerning your Draft Report dated August 17, 2012. I am also here and presenting on behalf of the Northern Food Grade Soybean Association.

Our Association is a regional group of producers, processors and marketers of Identity Preserved, Non-Genetically Modified food grade soybeans that directly supplies food manufacturers worldwide. Our best estimate is that the Company's in our Association handle soybeans from approximately 300,000 acres in the Upper Midwest.

After receiving and reading your draft report last week, let me say that we appreciate the dedication and work of the AC21 Committee members to try and develop workable solutions for the support of coexistence in production agriculture. I must also be honest and express our disappointment of not knowing anything or just now learning about this process that apparently started sometime in 2011. We have a knowledgeable group of experienced producers and exporters that could have provided valuable input.

Our immediate reaction to your suggestions for developing a crop insurance product to protect an IP producer from GM presence was that it is not only not necessary, but actually could create a "change in attitude" for the producer growing the IP grain under contract.

Our members have discussed this idea and the consensus was that less than 1% of all deliveries to our facilities by producers are rejected due to GM presence. Combine this with the fact that our tolerance level is less than 0.2%, you will quickly understand that producers are doing a good job of delivering product that is acceptable to contractual specifications. The concern we have with an insurance product is that it very likely could reduce the incentive for the IP producer to meet contract specifications. Furthermore, what prohibits a producer from signing an IP contract with no intention of delivering an IP product and then collecting on the insurance?

There are many excellent points made in your Report. Your 2<sup>nd</sup> bullet on Page 3 clearly notes that risk mitigation tools have evolved and improved over time and are being used successfully. A good reason for this is education. When producers enter into a contractual agreement for the production of IP crops, they are being well educated by the Companies offering the contracts. In addition, we agree with your first bullet on Page 5 that simply putting in place a compensation mechanism to address economic losses to farmers arising from unintended GM presence would completely eliminate such intended presence. In fact, we would argue that it could actually create higher levels of GM presence. We also like your comments in several areas of the report that relate to strengthening neighbor-to-neighbor relations with neighboring producers and creating incentives for better cooperation and good stewardship. This ultimately is a win-win for all involved and would go a long way to help mitigate most of the co-existence issues. For the same reason, if an insurance program was in fact implemented your Option III under Recommendation I we believe is a more positive approach along with the Recommendation III.

Regarding your seed quality statement on Bullet 1 on Page 19, we do not necessarily agree that there has been unified industry commitment to ensure that quality seed for the IP Non-GM producers contains no or even low levels of GM presence. Regularly, IP Non-GM producers that purchase seed supplies from private seed companies are not allowed to pre-test seed lots for GM presence prior to purchasing. It is important that recommendations be considered to improve the relationship and trust between seed companies and producers to ensure producers are planting a crop that will meet his/her contractual obligations. Your Recommendation V is a good initial step to make this happen.

Finally, let's be candid and agree that currently, the most significant issue related to coexistence is the unintended GM presence in agriculture production. Your final bullet on Page 3 indicates that GE products are legal and have been evaluated by scientific experts and regulators to be determined as safe for humans. Please understand that many consumers and food manufacturers internationally dispute this consistently and argue the validity of the scientific claims. It is important that the agriculture community recognize these global concerns and do everything we can to support co-existence of American agriculture.

Thank you again for the opportunity to present our views. I am happy to respond to any questions.