



Biotechnology Innovation Organization
1201 New York Ave., NW
Suite 1300
Washington, DC, 20005
202-962-9200

May 4, 2022

The Honorable Jeff Merkley
Chair
Subcommittee on the Interior,
Environment, & Related Agencies
Committee on Appropriations
U.S. Senate
Room S-128, The Capitol
Washington, DC 20510

The Honorable Lisa Murkowski
Ranking Member
Subcommittee on Interior,
Environment, & Related Agencies
Committee on Appropriations
U.S. Senate
Room S-128, The Capitol
Washington, DC 20510

Dear Chair Merkley and Ranking Member Murkowski,

BIO represents 1,000 members in a biotech ecosystem with a central mission – to advance public policy that supports a wide range of companies and academic research centers that are working to apply biology and technology in the energy, agriculture, manufacturing, and health sectors to improve the lives of people and the health of the planet. BIO is committed to speaking up for the millions of families around the globe who depend upon our success. We will drive a revolution that aims to cure patients, protect our climate, and nourish humanity.

The value of science and agricultural innovation cannot be understated. The adoption of biotechnology in agriculture and the development of biobased technologies contribute to food security, sustainability, and climate change solutions. Over the past 25 years, it enabled shifts in agronomic practices that led to significant and widespread environmental benefits.

BIO supports public policies centered on innovation to incentivize the adoption of cutting-edge technologies and practices and benefit rural economies. Further, it is crucial that the government establishes risk-proportionate, transparent regulations in a timely manner to maintain America's global leadership in the life sciences while protecting health and the environment.



Plant-incorporated protectants (PIPs) are an agricultural innovation delivering multiple benefits. PIPs, which are substances produced in a plant to help the plant fend off pests and diseases, contribute to the sustainability of agricultural production; enhance food security; conserve biodiversity; reduce greenhouse gas emissions; and foster resilience to threats posed by climate change. Some plants naturally produce a wide range of substances that help defend against pests and diseases. Newer gene editing tools enable technology developers to create PIPs through precise genetic alterations, resulting in plants similar to those that could be created via conventional breeding techniques.

In September 2020, the U.S. Environmental Protection Agency (EPA) issued a proposed rule titled “Pesticides; Exemptions of Certain Plant-Incorporated Protectants (PIPs) Derived from Newer Technologies.” In it, EPA proposed revisions that would extend an exemption for PIPs introduced into a plant using conventional breeding from certain requirements of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the Federal Food, Drug, and Cosmetic Act (FFDCA) to certain PIPs created through biotechnology, including some applications of gene editing.

Given the importance of predictable and science-based regulatory pathways, BIO requests that the Committee include language in its Fiscal Year 2023 Interior, Environment, and Related Agencies Appropriations Act to direct EPA to issue its final PIPs rule with 60 days of enactment.

Thank you for your consideration of this request. Should you have any questions or comments regarding these requests, please contact Erick Lutt, Senior Director of Federal Government Relations, at elutt@bio.org. We look forward to working with you throughout the appropriations process.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Michelle McMurry-Heath". The signature is fluid and cursive, with a long horizontal line extending to the right.

Michelle McMurry-Heath, MD, PhD