

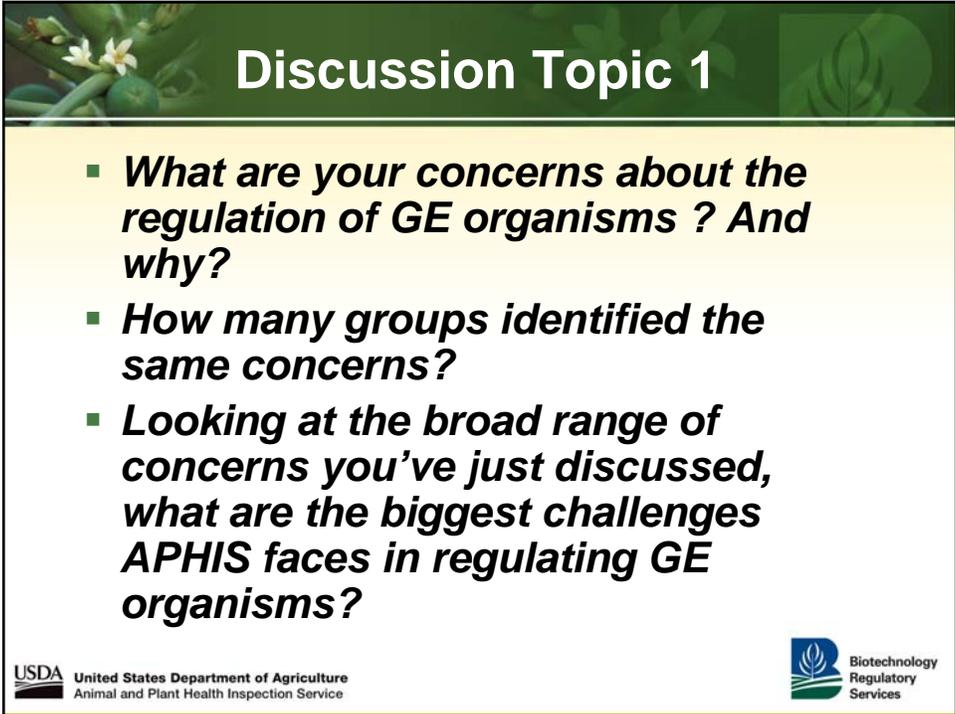


Discussion Questions

BRS April 340 Proposed Rule Meeting

 **United States Department of Agriculture**
Animal and Plant Health Inspection Service

 **Biotechnology
Regulatory
Services**



Discussion Topic 1

- ***What are your concerns about the regulation of GE organisms ? And why?***
- ***How many groups identified the same concerns?***
- ***Looking at the broad range of concerns you've just discussed, what are the biggest challenges APHIS faces in regulating GE organisms?***

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Discussion Topic 2

- ***Considering the authority under the PPA, are there any organisms, or characteristics of organisms, that you think pose risk and therefore should be covered by the regulation? If so, what organisms and what risks do you think they pose?***

Discussion Topic 2 Cont.

- ***Considering the authority of the PPA, are there any organisms you consider to be so safe that they can be excluded? If so, what organisms and why do you consider them to be so safe?***

Discussion Topic 3

- ***Given the breadth of the definition of noxious weeds in the PPA, what do you think are the practical constraints in regulating GE plants using the noxious weed provision?***

Discussion Topic 4

- ***Do these criteria adequately describe which GE organisms should be included and excluded from the regulatory process?***
- ***If not, what should APHIS do to further clarify the criteria so they can be consistently and uniformly understood?***

Discussion Topic 4 Cont.

- ***What other concerns do you have about the proposed scope?***
- ***What other approach might work better to determine what should be regulated?***

Discussion Topic 5

- ***What are your concerns about the harms/risks of pharma/industrial GE crops?***

Homework

- *What was the most enlightening moment for you yesterday?*
- *What are you still challenged by?*

Discussion Topic 5 Cont.

- *Given the authorities of the PPA, are there ways to mitigate these risks?*
- *Are there other mechanisms or processes outside of these authorities that merit discussion, and in what appropriate venues should that discussion take place?*

Discussion Topic 6

- ***What are the potential impacts of the proposed permitting procedures?***

Discussion Topic 6 Cont.

- ***What is important to you with respect to any procedures BRS puts in place to authorize environmental releases, imports, and interstate movement of GE organisms?***
- ***What approaches might work better to achieve the goals these procedures were intended to achieve?***

Discussion Topic 7

- ***Should the LLP policy be incorporated into the regulation? Why? Why not?***
- ***How can the criteria be revised to better accomplish APHIS' goal of deciding when to require remedial measures for LLP incidents?***

Discussion Topic 8

- ***What additional opportunities would you like to see the public have to participate in the development of this rule?***
- ***What opportunities would you like to see the public have in the execution of the regulation itself?***

Recap

- ***What new ideas or topics did you learn about during this meeting?***
- ***What issue do you have a new understanding or appreciation for?***
- ***What would you like to see happen next?***