



JIMMY PARNELL
PRESIDENT

February 29, 2024

Public Comments Processing
Attn: FWS-HQ-NWRS-2022-0106
U.S. Fish and Wildlife Service
5275 Leesburg Pike
MS: PRB (JAO/3W)
Falls Church, VA 22041-3803

RE: FWS-HQ-NWRS-2022-0106

To Whom It May Concern:

The Alabama Farmers Federation is an affiliate of the American Farm Bureau Federation and Alabama's largest farm organization representing over 350,000 members in all 67 Alabama counties. We appreciate the opportunity to comment on the proposed rule and updated policy for "biological integrity, diversity and environmental health" on the National Wildlife Refuge System (NWRS).

Farmers in Alabama have been and continue to participate in cooperative agriculture with NWRS, including Wheeler National Wildlife Refuge. This mutually beneficial relationship provides opportunities for farmers to access good farmland and leave a portion of their crop as feed for wildlife. However, due to policy changes over the last several years, the farmers have been pushed out and then invited back onto the refuge. This current proposal jeopardizes the continued use of genetically engineered crops (GECs) on NWRS lands which are essential to meeting the objectives of the NWRS.

Farmers choose to plant GECs due to their advantages, which include reduced pesticide applications, reduced tillage practices, reduced fuel consumption and greater and more consistent yields. These should be the same goals the NWRS seeks to achieve. Increased and more consistent production with less inputs are good for both the farmer and the ecosystem.

On August 2, 2018, the USFWS issued a policy memorandum withdrawing a July 17, 2014, policy which would have phased out the use of GECs on NWRS lands. At that time, the USFWS stated, "there may be situations, however, where the use of GMO crop seeds is essential to best fulfill the purposes of the refuge and the needs of birds and other wildlife..." We believe this is still the case and encourage the agency reach this same conclusion once again.

Further, genetically modified crops continue to be used widely in agriculture as they have time and time been found to be safe. In fact, the United States Food and Drug Administration (FDA) estimates that more than 95% of animals used for meat and dairy in the United States eat GMO crops. The FDA also states that studies show the health and safety of animals are the same whether they eat GMO or non-GMO foods. The USFWS should adopt this same view. Policies across various agencies at the federal level should not be at odds with one other.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Jimmy Parnell". The signature is fluid and cursive, with a large loop at the end.

Jimmy Parnell
President

