

September 5, 2025

The Honorable Brooke Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

CC: Deputy Secretary Stephen Vaden

Re: Secretary Memorandum: SM 1078-015, Department of Agriculture Reorganization Plan

Dear Secretary Rollins,

Thank you for your leadership in proposing the Department of Agriculture Reorganization Plan and for your willingness to consider and incorporate adjustments based on comments from the USDA stakeholder community as details of the reorganization and relocation plan are finalized.

We, the undersigned organizations, represent scientists and non-profit organizations who regularly interface with USDA Biotechnology Regulatory Services (BRS); and we are writing to **ask that BRS remain in the National Capital Region (NCR).**

As you know, BRS regulates the importation, interstate movement, and environmental release of certain crops, insects, and microbes developed using modern genetic techniques. Its workforce reflects a highly specialized expertise that cannot easily be replaced. As scientists and developers use cutting-edge biotechnologies to provide the U.S. agricultural sector with new and improved crops, microbes, and insects, we require BRS oversight and guidance. Without BRS's professional expertise in scientific and regulatory matters, our nation's product developers and farmers will be placed at an international disadvantage as other countries' regulatory processes proceed with greater speed and efficiency.

BRS Should Remain in the National Capital Region to Protect U.S. Biotechnology Leadership Through Federal Agency Coordination & Service to Stakeholders

BRS has long been a reliable, knowledgeable, and accessible partner for stakeholders developing each new generation of agricultural innovation. Commitment to collaboration is evident; even as the Covid pandemic shuttered offices and ended in-person meetings in 2020, BRS staff were among the first USDA workers back in the office resuming in-person operations, recognizing the critical importance of face-to face engagement to discuss

highly technical concerns. BRS continues to engage with stakeholders either one-on-one or through larger meetings, in which hundreds have participated over the last several years.

Just as vital as stakeholder engagement is coordination across federal agencies, which avoids duplication of effort and ensures efficiency. Although other USDA programs may benefit from newly co-located USDA offices, BRS benefits its stakeholders – and the nation – most by coordinating with its federal regulatory counterparts in the Food and Drug Administration (FDA) and the Environmental Protection Agency (EPA). These agencies, alongside BRS, comprise the Coordinated Framework for the Regulation of Biotechnology. In-person interagency meetings cannot be replaced virtually without sacrificing speed, clarity, and the informal but essential coordination that comes from proximity.

Your memorandum cites relocation of USDA staff as necessary for recruitment, and we recognize that the NCR does have a high cost of living. However, BRS has not had challenges recruiting staff, and it was fully staffed before the Deferred Resignation Program (DRP) and hiring freeze. Fully staffed, BRS was able to host in-person meetings, ramp up expedient permitting, and execute a quick regulatory pivot following the vacatur of the SECURE rule last fall.

The country depends on BRS to thoroughly and expediently move new innovations through the regulatory process. With the BRS NCR staff at only 67 F.T.E.s, as requested in the President's FY 2026 Budget Request, and with a significant proportion of that staff working as inspectors already dispersed throughout the country, any attrition of core NCR-based staff through relocation will inevitably result in significant delays for approvals, putting our agricultural industry directly in the crosshairs of global competitors.

Maintaining BRS in the NCR is not just a matter of convivence, it is a strategic imperative for the nation and its farmers. The United States cannot afford to weaken BRS at a time when global competition in agricultural biotechnology is intensifying. We respectfully urge USDA to preserve BRS's current location and ensure the nation's continued leadership in agriculture biotechnology.

Sincerely,

American Phytopathological Society

American Society for Microbiology

American Society of Agronomy

American Society of Plant Biologists

California Life Sciences

Crop Science Society of America

Entomological Society of America

Georgia Life Sciences
Montana Biosciences Organization
NC Life Sciences Organization
Oregon Bioscience Association
Soil Science Society of America
Weed Science Society of America