1st quick submission, April 4, 2026

Comment Submitted by By and For the People (byandforthepeople.org)
Opposition to Reduction in Recordkeeping and Reporting Requirements under 7 CFR Part 340 (OMB Control No. 0579-0085)

By and For the People strongly opposes any reduction, elimination, or weakening of recordkeeping, reporting, and information collection requirements associated with the regulation of genetically engineered organisms under 7 CFR Part 340.

Robust recordkeeping is not a bureaucratic burden—it is a foundational component of transparency, accountability, and public trust in the oversight of biotechnology. Any effort to scale back documentation requirements risks limiting the ability of regulators, independent scientists, and the public to adequately assess environmental and agricultural impacts.

Key concerns with reducing recordkeeping include:

- **Loss of traceability:** Accurate records are essential for tracking the movement, release, and performance of genetically engineered organisms across regions and over time. Reduced documentation impairs the ability to respond to unintended consequences.
- **Weakened oversight and enforcement:** Without comprehensive reporting, regulatory agencies are less equipped to detect noncompliance, evaluate risks, or take corrective action when issues arise.
- **Reduced scientific transparency:** Publicly available data from reporting requirements supports independent research and long-term ecological monitoring. Limiting this information restricts scientific scrutiny and informed decision-making.
- **Cumulative risk blindness:** Individual approvals may appear low-risk, but without consistent data collection, it becomes nearly impossible to evaluate cumulative and landscape-level impacts over time.

While efficiency and modernization of reporting systems are reasonable goals, these should be achieved through improved tools (such as streamlined digital submission), **not by reducing the quantity or quality of required information**.

At a time when multiple federal policy changes have already reduced environmental oversight and increased reliance on developer-provided data, maintaining strong recordkeeping requirements is more important than ever. Weakening these systems further would contribute to a broader erosion of public accountability in biotechnology governance.

Broader Regulatory Context

This proposed reduction in recordkeeping should not be evaluated in isolation. It is part of a broader pattern of recent federal actions that have steadily reduced public oversight and transparency across multiple agencies—and, with current proposals such as the upcoming bill

H.R. 1897 [1], that threaten to further institutionalize these largely non-public, accountability-limiting changes that this request is grounded in.

Recent actions include:

- The Council on Environmental Quality's (CEQ) June 1, 2024 "Phase 2 Rule," which weakens implementation of the National Environmental Policy Act (NEPA) by expanding categorical exclusions. This change allows certain projects—including those involving genetic engineering framed as "restoration"—to bypass meaningful environmental review, including through exemptions tied to incidental take permits (ITPs) and APHIS "NEPA exemption for incidental take permits" - listed here on CEQs webiste, named List of Federal Agency Categorical Exclusions (CE LIST), May 2024 (https://ceq.doe.gov/nepa-practice/categorical-exclusions.html)[2]
- The U.S. Fish and Wildlife Service's November 2025 proposed revisions to Sections 7 and 10, which shift decision-making toward incidental take permitting frameworks while offering "No Surprises" assurances, even in cases where ecological harm may occur.- https://www.federalregister.gov/documents/2025/11/21/2025-20551/endangered-and-threatened-wildlife-and-plants-interagency-cooperation-regulations
- USDA/APHIS actions (November 13, 2024) that exempt broad categories of genetically engineered plants, trees, and certain modified organisms from regulatory oversight.
- The FDA's May 4, 2024, approach to genomic alterations in animals relies heavily on limited transparency and developer-driven safety determinations.
  - https://www.fda.gov/animal-veterinary/biotechnology-products-cvm-animals-and-animal-food/intentional-genomic-alterations-igas-animals

Taken together, these changes represent a clear and concerning trend: a systematic rollback of independent oversight in favor of increased reliance on self-regulation by biotechnology developers with a history of reckless motives.

In this context, reducing recordkeeping requirements would further limit the already diminishing ability of agencies, researchers, and the public to evaluate real-world impacts of these technologies. Rather than weakening documentation standards, federal agencies should be reinforcing transparency and accountability mechanisms.

Our December 23, 2025, by and for the peoples submission regarding the U.S. Fish and Wildlife Service's proposed 'Interagency Cooperation Regulation' provides supporting evidence and a detailed explanation of how these regulatory changes would function in practice.[3] - Use the agency-provided link for all attachments.- https://www.regulations.gov/comment/FWS-HQ-ES-2025-0044-10294

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[1] HR1897 https://www.congress.gov/bill/119th-congress/house-bill/1897/all-actions

[2] List of Federal Agency Categorical Exclusions (CE LIST), May 2024 https://ceq.doe.gov/nepa-practice/categorical-exclusions.html

[3] By and for the peoples response to USFWS Proposed rule attachment, RE Endangered and Threatened Wildlife and Plants Interagency Cooperation Regulation.pdf

Please review the full range of known federal motivations driving these changes. refer to our response to "Endangered and Threatened Wildlife and Plants"[4] posted by the Fish and Wildlife Service on March 18, 2025, https://www.regulations.gov/comment/FWS-R3-ES-2024-0137-70501

Also this response to how this rule from BLM "Rescission of Conservation and Landscape Health Rule " [5]. And how this will effectively help destroy Americans rights to oversee our government actions.- **https://www.regulations.gov/comment/BLM-2025-0001-60996**

Recommendations:

1. Maintain or strengthen existing recordkeeping and reporting requirements.
2. Improve accessibility and transparency of submitted data for public and independent scientific review.
3. Invest in modernized, user-friendly reporting systems rather than reducing requirements.
4. Ensure long-term data retention to support cumulative impact analysis.

By and For the People urges APHIS and OMB to reject any proposal that diminishes recordkeeping requirements and instead reinforces the data infrastructure necessary for responsible oversight.

Strong records are not optional—they are essential to protecting ecosystems, agriculture, and the public trust in how our federal agencies manage regulations that affect the people's ecosystems and finances.

Maintaining strong recordkeeping is essential to ensuring that regulatory decisions remain grounded in evidence, subject to public scrutiny, and protective of long-term ecological and public interests.

APHIS should restore meaningful public engagement and discussion in meetings around policy changes that these rules ultimately shape. Over the past 17 years of regulatory changes, this essential component of transparent governance appears to have been significantly reduced.

More information available on the By and For the peoples website...
https://byandforthepeople.org/

Thank you for your consideration.

4/4/2026 Josh Wilson

[4] Attachment, comment_usfws_plants_and_animals_v2_may_2nd.pdf
[5] Attachment, Re Rescission of Conservation and Landscape Health Rule.pdf