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PennAg Industries Association

Serving Agribusiness Since 1878

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INDEPENDENT REGULATORY
REVIEW COMMISSION

June 16, 2008

Mr. Joe Garvey
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110

RE: Proposed Rulemaking – Department of Agriculture – 7 Pa. Code Chapters 111; 113 and 115

Dear Mr. Garvey,


On behalf of Pennsylvania's horticultural, agricultural and turf seed industries, I would like to convey the PennAg Seed Council's support of the proposed regulations, as published in the May 17, 2008 issue of the *Pennsylvania Bulletin*, for Seed Testing, Labeling and Standards (7 Pa. Code Chapter 111), General Provisions for Seed Certification (7 Pa. Code Chapter 113) and Standards for Seed Certification (7 Pa. Code Chapter 115).

We appreciate the acknowledgement the Department has given to the PennAg Seed Council in the anticipated regulations. The members of the PennAg Seed Council have been actively involved in and supportive of adopting these changes throughout the development of the updated Seed Law (ACT 164 2004) that had gone unchanged since 1968. Now, with the implementation of the proposed regulations, the process is complete and the seed industry can move forward with the changes they have been expecting for more than three years.

The adoption of the proposed regulations will continue to provide more uniformity within the seed industry, thus benefiting the seed producers and marketers as well as the consumers purchasing and using the products. The language of the provisions in these chapters is part of a national seed industry initiative working toward the adoption of Recommended Uniform State Seed Laws (RUSSEL). States across the nation are implementing RUSSEL components to ensure interstate commerce of seed is consistent and simplified. In addition to RUSSEL, the regulations will allow for compliance and continuity with federal seed regulation, the United States Department of Agriculture's Animal and Plant Health Inspection Service national harmonization program and certification standards of the Association of Official Seed Certifying Agencies. As proposed, the regulations address these issues, thus allowing Pennsylvania's seed industry to remain part of the competitive seed market.

Thank you for the opportunity to provide our support for these regulations and we encourage the Department's continued involvement with the members of the PennAg Seed Council.

Sincerely,



Amy M. Bradford
Assistant Vice President

Cc: Arthur Coccodrilli, Chairman – Independent Regulatory Review Commission
Leading the Way

