
From: Citizen Consumer [REDACTED]
Sent: Friday, August 25, 2017 3:52 PM
To: AMS - GMO Labeling
Subject: National Bioengineered Food Disclosure Standard

To whom this may concern at AMS:

Thank you for allowing for feedback regarding in the questionnaire format as you have, for the National Bioengineered Food Disclosure Standard.

I apologize in advance that my remarks will not be as thorough as they should be, but in the event there is another extension of the timeframe for allowing remarks, I will submit a more detailed set of answers, but for now, at the brink of the deadline, here goes:

Question 1. What terms should AMS consider interchangeable with 'bioengineering'?

The word 'bioengineering' to me indicates the large umbrella term that covers any subset technology term - from what is commonly called a GMO to the implementation of some sort of engineering construction or landscape project requiring machinery and earth moving (such as building a dam or buffer).

So it appears that further narrowing and clarification of the definition of the bioengineering is required, but also additional expansion of the definition under Section 291 (1)(A) is also required.

I have in my notes about 5 more pages worth of expansion and explanation on this topic, but due to my own personal time limit today, I will just say that when defining what the new standard resulting from this statute should be applied to, I would include for purposes of this statute that "bioengineering" includes any food related breeding terminology that has already been applied in any government, or quasi-government publications that relate to what the general public refers to as genetically engineered organisms.

This would include wording from state or federal statutes that have been proposed or enacted, National Academy of Sciences publications, case law reports, terminology in use in other countries grappling or more decisive with this issue, scholarly science articles and textbooks.

To me, as a mere consumer, this would mean some of the following technologies that relate to this term should apply:

- Genetic Modification
- Genetic Mutatation
- Genetically Engineered
- Transgenetically Engineered
- Cisgenetically Engineered
- Synthetic Biologically Engineered
- Chimeric Engineering
- Synthetic Clone Engineering
- Crispr CAS-9 Engineering

Plus, the definition must include the offspring/downline/future generations of such.

There are quite a few other terms I would write on here, but that would require a couple of days, perhaps even a week or so, of research to get these correct.

2. What breeding techniques should AMS consider as conventional breeding?

A committee or subcommittee of conventional farmers should determine this definition. They should meet with groups of citizens who care about the food system and the genetics related to the food system to receive months and months of input, so they can make good, thorough decisions with the maximum amount of input.

3. What modifications should AMS consider to be found in nature?

Need more time to answer this.

4. Will AMS require disclosure for food that contains highly refined products, such as oils or sugars derived from bioengineered crops?

My mere consumer opinion answers "yes", please require disclosure of such.

5. Although the Law states that the definition of bioengineering shall not affect any other definition, program, role, or regulation of the Federal government, could there be potential areas of confusion between the definition of bioengineering as used in the Law and other similar terms used by the Federal government? If so, what are the potential remedies that could be added to this regulation to alleviate any confusion between this definition and other by the Federal government?

Yes, there could be potential areas of confusion. This law could be amended to be more specific. Answering this question could take more time (at least a month) to research.

6. Meat, poultry, and egg products are only subject to a bioengineered disclosure if the most predominant ingredient, or the second most predominant ingredient if the first is broth, stock, water or similar solution, is subject to the labeling requirements under the FFDC&C Act. How will AMS determine the predominance of ingredients?

Why not full disclosure regardless of predominance? I would have to spend time understanding the downside of full disclosure.

7. How should AMS craft language in the regulations acknowledging that the law prohibits animal products from being considered bioengineered solely because the animal consumed feed products from, containing, or consisting of a bioengineered substance?

As a consumer I do care what the animals that I ingest have eaten. It is just important to me, so I would have to understand more about the standard to learn why anyone would not want to label such.

8. What is the amount of a bioengineered substance present in a food that should make it be considered bioengineered?

I think the integrity of our nation's food system is at stake if we as a country start splitting hairs and trying to create percentage loopholes. On the flipside that integrity might have already been breached by planting and breeding, but I would still like to see our government get a grip on this and label any amount of seed or animal that has been planted or bred as bioengineered. And the offspring/downline/future generations of such.

9. Should AMS consider more than one disclosure category?

Need more time to think about this question and research some. I have been trying to think this through for the past few days, but do not have an answer yet.

10. What other factors or conditions should AMS consider under which a food is considered a bioengineered food?

Need more time to consider and answer this. But, at this point, make sure included in the definition are any future generations of the initially engineered life form.

11. Could AMS consider whether a type food is considered a bioengineered food under the determination process?

I do not know what "medical food" is, but understand the AMA would want to say no on this, and would have to do more research on this issue.

However, with dietary supplements, I would say absolutely consider supplements under the determination process. Lest we forget tryptophan.

12. If a manufacturer chooses to use text to disclose a bioengineered food, what text should AMS require for a text disclosure?

Today, most consumers - here and in other English-speaking countries - are familiar with the term GMO. Why not use that term? Vermont's labeling seems fine, as well. AMS should allow the states who currently use certain wording to continue to do so, if they so choose. Running out of time...

13. If a manufacturer chooses to use a symbol to disclose a bioengineered food, what symbol should AMS require for disclosure?

No answer on this yet.

14. If a manufacturer chooses to use an electronic or digital link to disclose a bioengineered food, what requirements should AMS implement for an electronic or digital link disclosure?

No answer on this yet, other than perhaps give an indication in the bar code.

Questions 15 - 30

This standard is extremely important to me as a consumer, and I fear I have failed to submit my responses in a timely manner. I am late for a work appointment, and will not be back near a computer (unless something changes) for the rest of today. I would also need to take some greater amount of time to formulate the answers to all of these, but hope that some of this provides insight into at least a few consumers hopes.

Thank you very much for working on this issue!

Signed an interested consumer.