



*Home of Aunt Patty's & GloryBee Products*

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August 9<sup>th</sup>, 2017

The Honorable Sonny Perdue  
Secretary of Agriculture  
U.S Department of Agriculture  
1400 Independence Ave, S.W  
Washington, DC 20250

**RE: Proposed Rule Questions Under Consideration for GMO Disclosure and Labeling**

<https://www.ams.usda.gov/rules-regulations/gmo-questions>

Dear Secretary Perdue,

GloryBee is an independently owned natural ingredients distributor and manufacturer located in Eugene Oregon. We employ 204 people, and distribute our main products (sweeteners, flours, grains, and oils) to our customer base of bakeries, grocery outlets, restaurants and snack food manufacturers.

GloryBee strongly supports labeling genetically modified foods. As a manufacturer of ingredients and retail items, GloryBee is already well able to label product within USDA and FDA standards. Increasing labeling requirements will not be an undue burden, and is already part of our practices. In 2015, at the behest of a customer, GloryBee became the first US Company to sell non-GMO Project Verified Honey. Non-GMO Project Verified accounts for nearly \$20 million in sales in the last year. Organic product is over 53% of our business and accounts for nearly \$38 million in sales in the last 12 months.

We ask the USDA to take the following actions to help our business meet the demands of our customers, and our own ethical and environmental standards:

- 1) Disclose All GMOs – All GMO foods – including foods with GMO ingredients like refined sugars and oils, and foods with ingredients derived from all forms of genetic engineering like CRISPR and RNAi – must carry GMO disclosures.
- 2) Ingredient-by-Ingredient Disclosures – GMO foods should be labeled on an ingredient-by-ingredient basis so that I know exactly which ingredients are produced with genetic engineering when I am at the grocery store.
- 3) Rules for Digital Options – Some companies may try to hide the presence of GMOs behind QR codes. For these occasions, the USDA must create rules to ensure that codes are easy to scan, work



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every time and must require that retailers provide scanners in every aisle for consumers who do not have smartphones.

4) No More Delays – Americans have waited long enough for GMO disclosures. The USDA should ensure that that they meet the two year deadline and have the rules drafted by July 2018.

At GloryBee we believe in using business to the highest ethical and moral standard possible, and that includes refusing to sell food that we consider bad. We consider GMO's unethical because crops are bad for people, bees, and the environment. As a Christian company built on a belief in God and healthy living, GloryBee is concerned about the social and environmental impact of pesticides used on genetically modified crops. Glyphosate, the main ingredient used in Round Up, is harmful to the people who may come into contact with it, including farm workers and their families. <sup>1</sup>

Clearly defining and labeling genetically modified ingredients will help our business, and our customer's businesses.

Thank you for all you do.

Sincerely,

Alan Turanski, President  
Dick Turanski, Founder

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<sup>1</sup> <http://www.sciencedirect.com/science/article/pii/S0013935100940763>