From: Max Goldberg [redacted]
Sent: Monday, July 17, 2017 10:16 PM
To: AMS - GMO Labeling
Subject: Proposed Rule Questions Under Consideration - Feedback

Hello,

This is feedback related to the 30 questions that the USDA posed.

1) The USDA must define the term "bioengineering" and recognize that the terms “modern biotechnology,” “genetic engineering,” “GE,” “genetic modification,” “genetically modified organism,” and “GMO” should be interchangeable with “bioengineering.”

2) The USDA must acknowledge that products of bioengineering or modern biotechnology, as defined by the FDA, the National Organic Standards Board and others, **should not** be considered “modifications found in nature.”

Why?

Because the genetic sequences that create bioengineered food (genetically-engineered food) are made in a laboratory, are unique and are not found in nature.

This means that all food produced using gene-editing techniques, such as CRISPR-Cas9, must be subject to labeling.

3) Detection should not be an essential when determining if a food product should be labeled or not.
Just because today’s technology cannot detect genetic material in a highly processed food (GE-soy oil, for example) does not mean that it doesn't exist. It just means that today's technology cannot detect it. Technology that comes out in the next few years could very well detect it.

As a result, highly refined GE-products (oils, sugars, etc.) should be labeled. It was also the clear intent of Congress to cover highly refined products.

4) Consistent with the European Union and many countries throughout the world, the threshold for the amount of genetically-engineered material in a food should be 0.9%.

Using this globally accepted threshold will facilitate international trade.

5) The USDA must not exclude dietary supplements from labeling requirements since dietary supplements are generally considered foods by the FDA, are widely consumed and may be bioengineered.

Thank you so much for receiving my feedback.

Sincerely,
Max Goldberg
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