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Sent: Wednesday, July 19, 2017 6:12 AM
To: AMS - GMO Labeling
Subject: COMMENTS on GE labeling

To Agricultural Marketing Service, USDA,

Thank you for soliciting public input into the draft regulations.

Sierra Club, the country's oldest and largest conservation organization in the United States, urges the following to be incorporated in the regulations:

- 1) All forms of genetic engineering (GE) must be included in the definition of bioengineering. This includes CRISPR and RNA interference (RNAi).
- 2) Definitions should be compatible with the National Organic Standards Board.
- 3) Each GE ingredient must be identified, including highly refined GE oils and sugars and processed corn and soy ingredients - even if these GE ingredients are only present at undetectable levels in the final product.
- 4) GE ingredients must be clearly identified on the product labels.
Using labeling systems which require the use of a smartphone or computer is discriminatory and therefore not acceptable.
- 5) Manufacturers have had years worth of notice. Therefore, there should not be delays in making regulations effective.

We appreciate the opportunity to provide input on our democratic right-to-know.

Sincerely,

Laurel Hopwood, Chair
Sierra Club Genetic Engineering Team