

From: [ICAAS Inbox](#)
To: [AMS - GMO Labeling](#)
Subject: ICAAS Comments on the National Bioengineered Food Disclosure Standard
Date: Monday, July 17, 2017 8:22:54 AM
Importance: High

International Council on Amino Acid Sciences (ICAAS) is an international scientific NGO and a CODEX observer organization. ICAAS focuses on scientific issues related to the safety and quality of amino acids used in foods and dietary supplements world-wide (www.icaas.org.com).

ICAAS appreciates the opportunity to provide an input in Developing a Proposed Bioengineered Food Disclosure Rule. We are commenting below on points 4, 7, 10 and 11; which are relevant to ICAAS members' expertise:

4. Will AMS require disclosure for food that contains highly refined products, such as oils or sugars derived from bioengineered crops? (Sec. 291(1)(A))

ICAAS strongly supports the concept of not disclosing purified products manufactured in containment by the means of modern white-biotechnology (fermentation) from all requirements of the National Bioengineering Food Disclosure Standard, because they are undetectable as bioengineered. Such a non-disclosure would facilitate international trade and reduce the costs of traceability measures without compromising safety of the final consumers.

7. How should AMS craft language in the regulations acknowledging that animals consuming bioengineered feed are exempt from the disclosure requirements as bioengineered solely because they fed on bioengineered feed? (Sec. 293(b)(2)(A))

Not exempting animals consuming bioengineered feed from the disclosure would result in not enforceable and uncontrollable labelling of a very wide range of food products, including meat and all milk-based foods, and by extension also products like honey from bees. Thus, it would preempt the key purposes of the AMS since a significant majority of animal-derived products would require AMS disclosure.

10. What other factors or conditions should AMS consider under which a food is considered a bioengineered food? (Sec. 293(b)(2)(C))

Although the Federal USDA FSIS inspection regulations do not define "processing aid," the US Food and Drug Administration's (FDA) definition of this term (21 CFR 101.100(a)(3)) is applicable for the purposes of The National Bioengineered Food Disclosure Standard. ICAAS proposes that "processing aids" as defined in 21 CFR 101.100(a)(3) should be exempted from all requirements of the National Bioengineering Food Disclosure Standard.

11. Could AMS consider whether a type of food is considered a bioengineered food under the determination process? (Sec. 293(b)(2)(C))

ICAAS supports that all food/medicinal products intended to treat a disease or mitigate nutritional/health conditions in which amino acids are frequently used (e.g., medical food and dietary supplements), are exempted from all requirements of the National Bioengineering Food Disclosure Standard