
From: [REDACTED] on behalf of Nicholas Jankowski [REDACTED]
Sent: Friday, August 25, 2017 9:46 PM
To: AMS - GMO Labeling
Subject: Question submitted via Webpage

I just read the policy memo on consistency between the organic and bioengineered labeling rules. I want to add to my previously emailed comments an additional comment about that requirement.

The Organic certification rules have a arbitrary, unscientific definition of what it means to be a GMO or genetically modified food. This ruleset being proposed now is intended to clarify bioengineered food labeling and correct any misconceptions in the definition. The organic definitions and arbitrary exceptions are inconsistent with sound decisions on labeling bioengineered foods.

I strongly urge the rule making body to revisit the topic of bringing the organic and bioengineered food labeling to a consistent set of definitions that are clear, scientifically accurate, and unambiguous. I suspect that this will be most achievable if some ability to refine the organic definition is provided in the event of a conflict. It seems that that memo was put in place to avoid causing disruption. This whole process is a disruption. It is unacceptable to expect the bioengineered food label rules to make inconsistent rules to avoid "stepping on toes" of the organic ruleset.

The rulemaking committee should challenge that policy memo if it determines that accurate definitions and accurate labeling would require changes be made. Specific topics of concern are the inclusion of mutagenesis in the included definition of genetically modified foods, and specific arbitrary exceptions, for example rennet in making cheeses. Rules need to be consistent or the label will be meaningless.