

From: [Margaret Kenny](#)
To: [AMS - GMO Labeling](#)
Subject: Rule making for Genetically Engineered Foods
Date: Saturday, July 15, 2017 2:20:09 AM

Here are answers to some of your questions:

First, and very importantly, assure that labeling happens in a timely fashion!

8. What is the amount of a bioengineered substance present in a food that should make it be considered bioengineered? (Sec. 293(b)(2)(B))

No more than a .9% threshold in keeping with our major trade partners. Not 5%. Not 10% or more.
Clear definition of genetic engineering for plants and animals that includes the new technologies. Another way to put it would be to have the Codex definition at minimum so our definitions match our trade partners

12. If a manufacturer chooses to use text to disclose a bioengineered food, what text should AMS require for a text disclosure? (Sec. 293(b)(2)(D))

Use the text from the Vermont law.

15. Should AMS specify in the regulations the type of electronic or digital disclosure manufacturers, e.g. QR code, can use to disclose bioengineered food? What steps should AMS take if an electronic or digital disclosure method becomes obsolete? (Sec. 293(b)(2)(D))

23. Is there other equivalent on-package language that AMS should consider to accompany an electronic or digital disclosure besides “Scan here for more food information”? (Sec. 293(d)(1)(A))

Use Clear, specific, on-package labeling, such as “produced with genetically engineered ingredients” or a symbol that says “GMO” or “GE”. Do NOT use QR codes; QR codes are discriminatory against the elderly and low-income populations. Requiring scans of QR codes is overly burdensome for all consumers. It pushes disclosure on them, not the manufacturers.

20. For disclosures by small food manufacturers, what is the appropriate language indicating that a phone number provides access to additional information? (Sec. 293(b)(2)(F)(ii)(I))

Require all manufacturers/producers to label- no exemptions. Food is food, no matter the size of the entity that makes it.

**Thank you,
Peggy Kenny**