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Sent: Monday, July 17, 2017 2:34 PM
To: AMS - GMO Labeling
Subject: QR co

1. What terms should AMS consider interchangeable with 'bioengineering'? (Sec. 291(1))

Use the definition "Genetically engineered" as that's what it is. Please stop trying to make it look like it's something else with euphemisms.

2. Which breeding techniques should AMS consider as conventional breeding? (Sec. 291(1)(B))

They should NOT consider anything that falls outside the defintions used in Codex Alimentarius.

3. Which modifications should AMS consider to be found in nature? (Sec. 291(1)(B))

If the DNA is different than the DNA found in nature, ie if it's been genetically engineered in any lab and is patented as such, it's *obviously* not found in nature therefore should not be considered to be found in nature.

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))

Yes. Just because our technology cannot yet detect the protein levels it does not mean that technology won't be able to in the future. We are light years away from understanding what we are doing in the labs. For instance, until a few years ago, most of the DNA was considered "Junk" DNA. It's only recently that we find that science was too young in this field and that, in fact, it plays a vital role. Likewise, we now know that at least one published peer review study shows that there were over 1500 unanticipated mutations in off target sites on the genome of a CRISPR event. We don't know what we don't know yet, so until that day, we need labels so that citizens can decide if they want to be included in this experiment can decide if they want to participate in it or not.

5. Although the Law states that the definition of bioengineering shall not affect any other definition, program, rule, or regulation of the Federal government, could there be potential areas of confusion between the definition of bioengineering as used in the Law and other similar terms used by the Federal government? If so, what are the potential remedies that could be added to this regulation to alleviate any confusion between this definition and others by the Federal government? (Sec. 292(b))

If you use the definitions that Codex uses in all government then all will be in accordance not only within the government but with our trade partners. Farmers and citizen tax payers will continue to bear the burden while large corporations continue on unscathed. It's time to link our

country with the rest of the world not continue trying to force these unwanted products into other countries. We need a real capitalist market, not the current corporate socialized one. Unbelievable that this law requires taxpayers to do marketing campaigns for biotech via the FDA.

6. Meat, poultry, and egg products are only subject to a bioengineered disclosure if the most predominant ingredient, or the second most predominant ingredient if the first is broth, stock, water, or similar solution, is subject to the labeling requirements under the Federal Food, Drug, and Cosmetic Act. How will AMS determine the predominance of ingredients? (Sec. 292(c))

If an animal or its byproduct (egg, milk, broth, etc that come from a GE animal...clearly in the future as the only GE animal now approved is salmon) has been genetically engineered, it needs to be labeled. These exemptions are clearly ridiculous.

7. How should AMS craft language in the regulations acknowledging that the Law prohibits animal products from being considered bioengineered solely because the animal consumed feed products from, containing, or consisting of a bioengineered substance? (Sec. 293(b)(2)(A))

Unfortunately, most labeling worldwide does not acknowledge animals that have been fed GE feed. Until we, as a world, start to define animals (and other living organisms like humans) are genetically engineered just because we eat GE food, then we, unfortunately cannot expect more than our trade partners do. Just use the same language as the EU does.

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))

In keeping with our main trade partners, no more than .9%.

9. Should AMS consider more than one disclosure category? (Sec. 293(b)(2)(D))

No. This is ridiculous. Make is simple for farmers, producers, manufacturers and MOSTLY citizens who eat this stuff. Use the Codex definition and label all of it. Anything else will make this sham of a law even more confusing.

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

It should also include all synthetic biology products, too. By this I mean if a bacteria or algae is genetically engineered to produce vanilla or oil or any product, it's genetically engineered, just as mentioned above if a GE chicken is made, it needs to be labeled as well as its eggs.

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

All foods need labeling. No exemptions.

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))

"Produced with Genetic Engineering" they should be required, it should not be a choice.

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

A symbol with "GMO" or "GE" clearly on package

14. If a manufacturer chooses to use an electronic or digital link to disclose a bioengineered food, what requirements should AMS implement for an electronic or digital link disclosure? (Sec. 293(b)(2)(D))

QR codes are a joke, they are discriminatory and put the burden on the citizen not the manufacturer to tell the truth about their product. They can use a QR code for folks who want more info but they should be required to also have text or a symbol clearly on package.

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))

See #14. No QR codes only. It's dishonest, a sham, and unfair to citizens.

16. What kind of text, symbol, or electronic or digital disclosure should AMS require for bioengineered food that is not purchased from a grocery store shelf, such as food for sale in bulk (such as fresh produce in a bin or fresh seafood at a fish counter), in a vending machine, or online? (Sec. 293(b)(2)(D))

Same as on package. See #s 12 and 13. Keep it consitent, fair and logical.

17. The Law offers special provisions for disclosure on very small or small packages. How should AMS define very small or small packages? (Sec. 293(b)(2)(E))

Very few foods can be packaged in something that's smaller than 1" squared. "GE" symbol can fit even on that.

I don't have time to answer more but I think I've been pretty clear. We need clear, on package labels with text or symbol. We need a .9$ threshold. We need no exemptions. We need the same definitions as our trade partners: that from Codex. We need NO QR codes.

I don't trust this agency to do what's right. Please prove me wrong.

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