From: J. Moreira

Sent: Saturday, August 19, 2017 5:47 PM

To: AMS - GMO Labeling

Subject: Put genetically engineered ingredients on the product label

AMS will be drafting regulations to implement the National Bioengineered Food Disclosure Standard. Genetically engineered (GE) foods pose risks that are not considered by regulators. Consumers have a right to know whether the products they buy contain GE ingredients. This information should be on the product label.

Thank you for soliciting public input into the draft regulations. I hope that you will consider posting comments you receive on the AMS website. In response to your request for input, I believe that the following are important points to incorporate in the regulations.

- The definition of "bioengineering" must include all forms of genetic engineering, including newer forms like CRISPR and RNA interference (RNAi). Definitions should be compatible with those recommended by the National Organic Standards Board.
- Each GE ingredient must be identified, including highly refined GE sugars and oils and processed corn and soy ingredients. Even if they are so highly processed that the GE ingredients are present only at undetectable levels in the final product, they are still GE foods.
- GE ingredients must be identified on product labels, or product shelves in the case of raw foods. All products required to have labels should include identification of GE ingredients on the label.
- There must be no delays in making regulations effective. Manufacturers have already had years' worth of notice and preparation to provide this information, at the state and federal level. Indeed, many major food companies have been labeling for some time.

Thank you for this opportunity to provide input.

Sincerely,

Mr. J. Moreira

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