From: Dan Norris

Sent: Saturday, August 05, 2017 11:59 AM

To: AMS - GMO Labeling **Subject:** RE: GMO Labeling

Answers to your 30 questions:

1. Terminology should be clear and consistent. Terms like genetic engineering or genetic modification are widely understood.

2

AMS should utilize the following definition recommended by the National Organic Standards Board .

2

Classical/Traditional plant breeding

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Classical (also known as traditional) plant breeding relies on phenotypic selection, field based testing and statistical methods for developing varieties or identifying superior individuals from a population, rather than on techniques of modern biotechno logy. The steps to conduct breeding include:

generation of genetic variability in plant populations for traits of interest through controlled crossing (or starting with genetically diverse populations), phenotypic selection among genetically distinct individuals for traits of interest, and stabilization of selected individuals to form a unique and recognizable cultivar. Classical plant breeding does not exclude the use of genetic or genomic information to more accurately assess phenotypes, however the emphasis must be on whole plant selection.

3.