
From: Bill [REDACTED]
Sent: Monday, August 07, 2017 6:17 PM
To: AMS - GMO Labeling
Subject: GMO labeling

GMO labeling should be clear and readable on food products. Any labeling requiring smart phone scanning is unacceptable as many consumers do not own smart phones and for those that do, scanning and reading the information for each product would be too time-consuming. Furthermore:

- The Agricultural Marketing Service (AMS) should recognize a limited number of alternative terms—namely “modern biotechnology,” “genetic engineering,” “GE,” “genetic modification,” “genetically modified organism,” and “GMO”—to be interchangeable with “bioengineering.” The first three are terms recognized by the Food and Drug Administration (FDA), and the latter two by the Food Safety and Inspection Service (FSIS).
- Products of bioengineering, or modern biotechnology, as defined by the Food and Drug Administration (FDA), Codex Alimentarius, the National Organic Standards Board (NOSB) and others, including gene-edited products, should not be considered “modifications found in nature” under Section 291(1)(B) of the law, and should be subject to the law’s disclosure requirements because the genetic sequences that create bioengineered foods are made in a laboratory and are unique.
- AMS should require disclosure for food that contains highly refined ingredients from bioengineered crops such as soy and corn regardless of whether the bioengineered genetic material can be detected using current methodology, because the fact that genetic material cannot be detected using current methods does not mean it is not there. It was also the clear intent of Congress to cover highly refined products.
- AMS should set the threshold for the amount of genetically engineered material in a food or food ingredient, above which the ingredient would be considered to be bioengineered and therefore required to be disclosed, at 0.9% of each ingredient in a food, since this is the threshold used in the European Union and many other countries. Using this globally accepted threshold will facilitate international trade.
- AMS should not exclude dietary supplements from the disclosure requirements under P.L. 114-216 since dietary supplements are generally considered foods by the FDA, are widely consumed and may be bioengineered.

Thank you.

William Roberson

[REDACTED]
Brooklyn, NY [REDACTED]