
From: Marty Mesh <Marty@foginfo.org>
Sent: Friday, August 25, 2017 8:58 PM
To: AMS - GMO Labeling
Subject: comments on GMO labeling

Consistent with the statute and the related USDA Policy released since the labeling law was signed, Florida Certified Organic Growers and Consumers, Inc DBA Florida Organic Growers (FOG) appreciates the opportunity to provide input on GMO labeling. FOG requests a final rule that will put into action the following key organic provisions:

- USDA shall consider organic certification sufficient to make a claim regarding the absence of bioengineering in the food, such as “not bioengineered,” “non-GMO,” or another similar claim;
- The final rule should clearly state that products exempt from mandatory disclosure as bioengineered foods, such as milk from cows fed genetically modified feed, must not by default qualify for an absence claim solely because the food is not required to bear a disclosure;
- No proposed rules for bioengineered food disclosure will require that modifications be made to the USDA organic regulations; and
- No certified organic products will require disclosure as bioengineered.

We also strongly urge USDA to:

- Recognize “non-GMO” or other similar phrases as acceptable shorthand term for “not produced using genetic engineering/bioengineering”
- Use its authority and broadly interpret the definition of “bioengineering” to include highly refined products such as oils or sugars derived from bioengineered crops, and
- Establish a clear mechanism for public comment on any future determinations regarding whether genetic modification techniques will require labeling.

These common sense, forthright and truthful suggestions and requests are in line with the Congressional intent to provide consumers with truthful label claims so individuals who desire may choose to have a better understanding as to what organic and other labels mean.

Thank you for the opportunity to comment,

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