
From: Richard and Caroline [REDACTED]
Sent: Thursday, August 03, 2017 7:48 PM
To: AMS - GMO Labeling
Subject: The National Bioengineered Food Disclosure Standard

Hello,

I'd like to give input to your 30 questions. Several were outside my area of knowledge but I did my best to give input where I could.

- 1) Bioengineering is good, especially if you decided to include CRISPR derived products in the label. If not then you could also use genetically engineered.
- 2) If I had my way Conventional Breeding would only include cross breeding and hybridization. Realistically picking arbitrary cut off might be best. Techniques to manipulate plant genes developed before 1980 are considered conventional breeding.
- 3) Tough one. There are examples of naturally occurring GE plants like the Sweet Potato. This argues against having a label at all. I think all breeding techniques can have natural analogs, perhaps not as sophisticated but the basic premise

If you must, I would keep it to cross breeding and hybridization done by pollinators other than humans.

- 4) No. Don't do it. The label is pointless from nutrition and safety standpoint, at least keep it credible to foods that may have the transgene. Refined sugars and oils don't have enough DNA to credibly constitute any kind of gene let alone the possibility of the transgene.
- 5) Well if you define the term within the regulation it should be clear what you mean in this context. Bioengineering = derived from genetic engineering. See my answer to question 1.
- 6) If the most predominant ingredient is say Corn (actual corn not syrup see Q4), then a label may be needed. Currently we don't have any GE meat or poultry so there is no need to label those products. Someday we may have GE meat or poultry in which case the label would apply.
- 7) Good idea. How about: Bioengineered refers to the actual crop or animal, inputs such as feeds, vitamins, or other nourishment may have bioengineered components but they do not transfer bioengineered status. Bioengineered only refers to the animal, plant, or microbe that was engineered.
- 8) How about if the collective ingredients are more than 50% bioengineered then it must be labeled. By that if more than 50% of the product has been bioengineered it should be labeled.
- 9) I wouldn't do it. Keep it simple. If the main ingredient or aggregate of ingredients is over 50% label it as bioengineered. Derived from is too far removed. Only actually bioengineered ingredients should count.
- 10) See my answers to questions: 2,3,6 and 9.
- 11) Food is food. If you eat it the label should apply. Again, only if the food itself is bioengineered.

- 12) As long as AMS defines bioengineered as genetically engineered such language would work, as long as it is consistent with the law. See question 10.
- 13) I agree the image should be positive or neutral and under no circumstances should it convey a warning. Perhaps a green leaf. Two hands holding a seedling. A smiley face with the DNA double helix for the smile.
- 14) I think a simple statement and the website or QR code. For bioengineering information see:
- 15) Always leave it open ended. Something like may use a QR code or equivalent electronic/digital method.
- 16) On vending machines and displays direct consumers to a QR code for more information.
- 17) Seems logical. If the FDA already has a method, use it.
- 18) I like the phone number or web address. Keep is direct.
- 19) This is outside my experience. Following the FDA's lead seems reasonable.
- 20) Keep it simple. For additional information call X.
- 21) I don't know.
- 22) See question 19
- 23) Scan works for me.
- 24) I would prefer a small QR code located under the ingredient list. If not there then on the back lower right of the package.
- 25) See 24.
- 26) Something electronic at the place business seems best to me.
- 27) I would suggest requiring documentation from each supplier, perhaps as part of Q26, be provided to USDA show compliance with Q10.
- 28) I don't know
- 29) I would look to the FDA for examples on make public disclosures on the website.
- 30) Imports that meet the requirements of Q10 should be labeled.

This label gives no information on safety, or nutrition. There is no scientific basis for the label, it was driven purely by politics. But it is the law so it should be applied consistently, even if it makes no sense.

Thank you,
Richard Green