



July 21, 2017

United States Department of Agriculture  
Agricultural Marketing Service  
Room 2532, South Agriculture Building, Stop 0273  
1400 Independence Ave. SW  
Washington, D.C. 20250  
Re: National Bioengineered Food Disclosure Standard

Dear Madam or Sir:

The International Food Information Council (IFIC) Foundation appreciates the opportunity to submit comments on the National Bioengineered Food Disclosure Standard labeling of human food products as requested by the United States Department of Agriculture, Agricultural Marketing Service (AMS).

The IFIC Foundation (<http://www.foodinsight.org>) is a §501(c)(3) nonprofit, educational organization with a mission to effectively communicate science-based information about health, nutrition, and food safety for the public good. One of the objectives at the IFIC Foundation is understanding public perceptions by conducting consumer research. The Foundation has been exploring Americans' attitudes toward food safety and nutrition for more than three decades. We have conducted our signature research project, the annual *Food and Health Survey*, for the past 12 years.

The Foundation believes that consumer research is a pertinent first step in determining Americans' understanding of food labeling information and examining how consumer knowledge, perceptions, and attitudes may impact behavior. The IFIC Foundation's *Food and Health Survey* is an online survey of more than 1,000 Americans ages 18 to 80, weighted to ensure that the results are reflective of the American population, as seen in the 2016 Current Population Survey. Specifically, the results are weighed by age, education, gender, race/ethnicity, and regions. The *Food and Health Survey* is conducted by an external research firm.

Comprehensive review of scientific research, as performed by the National Academy of Sciences (NAS), has found that GMO foods are just as nutritionally beneficial as their non-GMO counterparts, and there are no potential adverse health effects in GMO foods as compared to non-GMOs.<sup>1</sup> Various preeminent scientific and technical organizations have reviewed the safety data on GMO foods and have found GMOs to be safe: the American Medical Association, the World Health Organization, the National Academy of Sciences (US), the Royal Society of Medicine (UK), the American Association for the Advancement of Science, the European Commission, the Union of German Academics of Sciences and

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<sup>1</sup> National Academies of Sciences, Engineering, and Medicine; Division on Earth and Life Studies; Board on Agriculture and Natural Resources; Genetically Engineered Crops: Experiences and Prospects (2016), <https://www.nap.edu/catalog/23395/genetically-engineered-crops-experiences-and-prospects>

Humanities, the French Academy of Science, and Food Standards Australia and New Zealand.<sup>23</sup> Still, many consumers lack an understanding about the use of biotechnology in food production. As a result, there is a widespread knowledge gap about this key aspect of the food supply chain and the safety of biotechnology and GMOs.

IFIC Foundation research shows that consumers have an interest in where their food comes from and how their food is made, and they want simple ways to evaluate these production factors. We see, in general, that while some consumers want more information about GMOs and biotechnology as it relates to food production, many also feel they don't have enough information about GMOs while making food/beverage purchases.

The 2016 and 2017 editions of the IFIC Foundation *Food and Health Survey* include several relevant data points for consideration. Below is a summary of these findings.

### **2016/2017 Food and Health Survey Key Findings**

**Food Safety Considerations:** Americans are confident in the safety of our food supply (more than 60 percent). In addition, when given a list of potential food safety concerns, our research found that Americans have moderate concerns about GMOs; however, GMOs rank considerably behind foodborne illnesses from bacteria (the primary concern, with almost 60 percent of consumers ranking this choice as number one), followed in descending order by carcinogens or cancer-causing chemicals in food, pesticides, chemicals in food, and food additives and ingredients. (Table 1)

The 2016 survey also found that, when given a list of food ingredients that consumers may aim to avoid, 32 percent are trying to limit or avoid GMOs in their diet—compared to 61 percent limiting or avoiding added sugars and 53 percent limiting or avoiding salt/sodium. (Table 2)

In 2017, the survey specifically asked about food safety concerns that alter food choices. Data gathered show that 43 percent of consumers changed their eating habits based on food safety. Consumers did not highly rate GMOs as a safety concern that would alter their habits (less than 5 percent of consumers). GMOs trailed considerably behind foodborne illnesses from bacteria and carcinogens/cancer-causing chemicals as a safety concern. (Table 3)

**Food Labeling Terms and Advertisements:** IFIC Foundation data consistently indicates that while consumers are paying attention to specific labeling terms, "Non-GMO" is not among the terms consumers most frequently seek. In 2016, when asked specifically about certain keywords and terms consumers look for on food packages and in restaurants, "Non-GMO" (the specific nomenclature we asked about for the first time in 2016) ranked behind "Natural," "No added hormones or steroids," "Locally-sourced," "Organic," "Raised without antibiotics," and "Pesticide-free." Only 21 percent of

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<sup>2</sup> National Research Council; Institute of Medicine; Division on Earth and Life Studies; Food and Nutrition Board; Board on Agriculture and Natural Resources; Board on Life Sciences; Committee on Identifying and Assessing Unintended Effects of Genetically Engineered Foods on Human Health (2004), <https://www.nap.edu/catalog/10977/safety-of-genetically-engineered-foods-approaches-to-assessing-unintended-health>

<sup>3</sup> American Association for the Advancement of Science, Statement by the AAAS Board of Directors On Labeling of Genetically Modified Foods (2012), [https://www.aaas.org/sites/default/files/AAAS\\_GM\\_statement.pdf](https://www.aaas.org/sites/default/files/AAAS_GM_statement.pdf)

consumers were looking for “Non-GMO” labeling in stores and only 14 percent in restaurants. This compared to 35 percent looking for “Natural” labeling in stores and 23 percent in restaurants. (Table 4)

Comparable results appeared in 2017 with respect to labeling for food/beverage purchases in stores and choices at restaurants. Twenty-six percent of consumers were seeking “Non-GMO” labeling when making food and beverage choices, and only 16 percent look for “Non-GMO” options at restaurants. (Table 5)

Of note, while the “Non-GMO” label is not highly sought out, this does not necessarily mean consumers are uninterested in having more labeling disclosures with respect to GMOs. In 2016, the IFIC Foundation explained to consumers that current U.S. Food and Drug Administration (FDA) policy required special labeling for foods produced with biotechnology (“GMOs”) only when such foods were substantially different from their non-GMO counterparts (e.g., if the food has different nutritional content). The survey then asked if consumers supported or opposed that FDA policy. Forty-two percent of consumers supported FDA’s labeling policy but also wanted more labeling information about GMO content. Twenty-nine percent were unsure whether they supported or opposed the policy. (Table 6)

**Impression of the Use of GMOs:** The IFIC Foundation sought to measure consumer favorability about the use of biotechnology/GMOs by asking, “What is your overall impression of using biotechnology (“GMO”) to produce food products?” More than 50 percent of consumers were somewhat neutral on this issue (26 percent were neither favorable nor unfavorable, and almost the same percentage noted that they didn’t have enough information). (Table 7) This likely indicates that GMO labeling efforts should be combined with a comprehensive effort to educate consumers about bioengineered foods.

**Conclusion:** Overall, IFIC Foundation’s data indicate that while 25 percent of consumers have some safety concerns about the use of biotechnology/GMOs in food, a similar number simply are unsure. Additionally, when it comes to labels, looking for “Non-GMO” is not a top priority for consumers: Only about one in four Americans regularly buy food that is labeled as “Non-GMO.” Nevertheless, there is a desire for expanded labeling notices about GMOs in food.

The large percentage of consumers who are uncertain about GMOs underscores the need for future labeling efforts that could help reduce doubt, while also educating Americans about the safety of GMOs.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Clayton". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke at the end.

Joseph Clayton  
President, IFIC Foundation