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To: [AMS - GMO Labeling](#)
Cc: [Mark Mammen](#); [Dave Allibone](#)
Subject: Comment on Sec. 291 (1)(A)
Date: Monday, July 17, 2017 6:14:23 PM

4. Will AMS require disclosure for food that contains highly refined products, such as oils or sugars derived from bioengineered crops? (Sec. 291(1)(A))

Honey is highly refined, not by man, but the honey bee (*Apis mellifera*).

The honey bee may visit bioengineered crops but de-selects proteins in favor of carbohydrates (nectar) produced by the flower.

The beekeeper cannot certify that, in the course of this foraging, that the bees have not visited GM crops to gather nectar.

Due to the honeybee's selective foraging, honey is naturally low in protein and genetic material. Protein levels average below 0.3% by weight, well below the 'Action Threshold' of 0.9% by weight cited in some non-GMO standards.

Furthermore, in *filtered* honey products, the proteins and genetic material comprising the pollen grains that are incidentally found in honey are subsequently removed by the conventional filtration used to remove foreign material from liquid honey.

The Honeybee has not been genetically engineered and, therefore, does not contain any engineered genetic material or proteins.

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