

From: [Margery Winter](#)
To: [AMS - GMO Labeling](#)
Subject: Bioengineered Food disclosure Proposal: 30 Questions
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- 1. What terms should AMS consider interchangeable with 'bioengineering'? (Sec. 291(1)). A: Genetically engineered, GE, Genetically Modified Organisms, GMO, laboratory created Label each ingredient on the list as 'gmo' or 'GE', whether that technique was recombinant, synthetic biology, cisgenics, RNAi, CRISPR or any other non-natural artificial method of genetic manipulation not possible in nature.**
- 2. Which breeding techniques should AMS consider as conventional breeding? (Sec. 291(1)(B)). A: Any reproduction that could occur in nature, plus grafting and hybridization. Cloning and the above techniques in question 1, or feeding GE, GMO plants or animals to an animal should also require labeling noting that GE/GMO as in question 1 was fed to the animal.**
- 3. Which modifications should AMS consider to be found in nature? (Sec. 291(1)(B)). A: grafting, hybridization and a few interspecies mating such as the donkey and horse, creating a mule.**
- 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)). A: They need to label all bioengineered products.**
- 5. Although the Law states that the definition of bioengineering shall not affect any other definition, program, rule, or regulation of the Federal government, could there be potential areas of confusion between the definition of bioengineering as used in the Law and other similar terms used by the Federal government? If so, what are the potential remedies that could be added to this regulation to alleviate any confusion between this definition and others by the Federal government? (Sec. 292(b)) A: See Question 1. Don't use a bunch of different terms that are merely different techniques of GE or GMO. This will simply confuse the public.**
- 6. Meat, poultry, and egg products are only subject to a bioengineered disclosure if the most predominant ingredient, or the second most predominant ingredient if the first is broth, stock, water, or similar solution, is subject to the labeling requirements under the Federal Food, Drug, and Cosmetic Act. How will AMS determine the predominance of ingredients? (Sec. 292(c)). A: Most breeding, husbandry, and farming businesses which want to avoid producing these foods will seek to avoid feeding any GE food to their animals. It is a health issue to their animals and their customers. The requirement should be no GMO label means that no GMO food was fed to the animal which resulted in the meat.**
- 7. How should AMS craft language in the regulations acknowledging that the Law prohibits animal products from being considered bioengineered solely because the animal consumed feed products from, containing, or consisting of a bioengineered substance? (Sec. 293(b)(2)(A)). A: State that some, or none of the animal feed was GMO.**
- 8. What is the amount of a bioengineered substance present in a food that should make it be considered bioengineered? (Sec. 293(b)(2)(B)). A: One percent, the amount that often is contaminated by cross pollination in open**

fields.

9. Should AMS consider more than one disclosure category? (Sec. 293(b)(2)(D)). A: No. Use simply “GMO”, “GE” or spell out what those abbreviations stand for. Or whether animal products have been fed GE products.

10. What other factors or conditions should AMS consider under which a food is considered a bioengineered food? (Sec. 293(b)(2)(C)) A: None. Obfuscation will be deliberately to confuse the public.

11. Could AMS consider whether a type of food is considered a bioengineered food under the determination process? (Sec. 293(b)(2)(C)) A: No exemptions. One of the first GE supplements caused deaths.

12. If a manufacturer chooses to use text to disclose a bioengineered food, what text should AMS require for a text disclosure? (Sec. 293(b)(2)(D)). A: See question 1. Labels should be small and simple, and right on the product, requiring minimal effort to read. No further research should be required, such as using QR codes or referring to web sites.

13. If a manufacturer chooses to use a symbol to disclose a bioengineered food, what symbol should AMS require for disclosure? (Sec. 293(b)(2)(D)). A: No symbols should be used.

14. If a manufacturer chooses to use an electronic or digital link to disclose a bioengineered food, what requirements should AMS implement for an electronic or digital link disclosure? (Sec. 293(b)(2)(D)), and 15. Should AMS specify in the regulations the type of electronic or digital disclosure manufacturers, e.g. QR code, can use to disclose bioengineered food? What steps should AMS take if an electronic or digital disclosure method becomes obsolete? (Sec. 293(b)(2)(D))

A: Labels should be small and simple, and right on the product, requiring minimal effort to read. No further research should be required, such as using QR codes or referring to web sites. All this stuff are merely efforts to confuse customers.

16. What kind of text, symbol, or electronic or digital disclosure should AMS require for bioengineered food that is not purchased from a grocery store shelf, such as food for sale in bulk (such as fresh produce in a bin or fresh seafood at a fish counter), in a vending machine, or online? (Sec. 293(b)(2)(D)). A: The same GMO or GE label should be clearly present when buying wholesale or in bulk.

17. The Law offers special provisions for disclosure on very small or small packages. How should AMS define very small or small packages? (Sec. 293(b)(2)(E)), and 18. What are the reasonable disclosure options AMS should provide for food contained in very small or small packages? (Sec. 293 (b)(2)(E)). A: That’s plenty of room to make a clear label. Not much room is needed for two or three capital letters: “GMO” or “GE.”

...22. How should AMS define very small food manufacturers to exclude these manufacturers from the requirements of the regulation? (Sec. 293(b)(2)(G)(ii)). Those manufacturers or farm businesses that distribute within a 200 mile area can be exempt, because local businesses tend to be safer when they know the community they serve. Same for restaurants.

23. - 25. regarding requiring the customer to do more research: Again, no

obfuscation should be allowed.

26. What types of records should AMS require to be maintained to establish compliance with the regulations? (Sec. 293(g)(2)). Require two years, including the original chemical company that produced these seeds for crops and the method used to produce. AND ANY HEALTH COMPLAINTS FROM CUSTOMERS OR LIVESTOCK FED THE GE CROPS, OR ESCAPING GE FISH INTO THE ENVIRONMENT AND ANY CONSEQUENCES FROM EITHER OF THIS. ALSO ANY LAWSUITS FROM NON-GE FARMS OR SUING OF NON-GE FARMS AND THE CONSEQUENCES OF THESE LAWSUITS.

27. How should AMS obtain information related to potential non-compliance with these regulations? Is there information USDA should request prior to conducting an examination of non-compliance? (Sec. 293(g)). A: Some of the same methods of obtaining information from certified organic businesses should be used. See 26.

...29. How should AMS make public the summary of any examination, audit, or similar activity? (Sec. 293(g)(3)(C)). A: All information should be sent by request from any member of the public, and also when health or legal consequences are involved.

30. What should the requirements for imports into the United States of products covered by the Law/regulation be? (Sec. 294(a)). Imports should be covered by the same laws and regulations, and should be examined at the dock or border.