



July 17, 2017

Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave. SW  
Washington, DC 20250

Submitted electronically via: [GMOLabeling@ams.usda.gov](mailto:GMOLabeling@ams.usda.gov)

**Re: Comments on National Bioengineered Food Disclosure Standard Proposed Rule Questions Under Consideration**

Dear Docket Clerk:

The American Feed Industry Association appreciates the opportunity to comment on the U.S. Department of Agriculture's Agricultural Marketing Service questions under consideration for the proposed rule related to the National Bioengineered Food Disclosure Standard.

Based in Arlington, Virginia, AFIA is the world's largest organization devoted exclusively to representing the business, legislative and regulatory interests of the U.S. animal feed industry and its suppliers. Founded in 1909, the organization membership is comprised of the total feed industry—from commercial and integrated feed manufacturers, to ingredient suppliers, pet food manufacturers, pharmaceutical companies, industry support and equipment manufacturers. AFIA is also the recognized leader on international industry developments and holds membership in the International Feed Industry Federation.

Members include more than 650 domestic and international companies. More than 75 percent of the feed and 70 percent of the non-grain ingredients including soybean meal, distillers co-products, vitamins, minerals, amino acids, yeast products and other miscellaneous/specialty ingredients in the U.S. are manufactured by AFIA members.

Our members strongly support the application of science to agricultural production, including the use of biotechnology, which has consistently proven to be safe over the course of decades of rigorous scientific research. Consistent with the National Bioengineered Food Disclosure Standard Act, we oppose deeming food derived from animals as “bioengineered” solely on the basis the animal consumed bioengineered food.

In Question 7, the agency asked how specific language should be crafted to acknowledge the prohibition in Sec. 293(b)(2)(A). AFIA believes the agency can simply use the language provided in the law to convey this message. To strengthen the language and to provide clarity in definitions, AFIA suggests the following language:

“Edible products derived from animals that consumed animal food (as defined in 21 C.F.R. § 507.3) that is deemed bioengineered are exempt from disclosure in subpart XX as ‘bioengineered’ unless there is a basis for disclosure that is unrelated to the source animal’s ration.”

This would clearly provide a definition of animal feed by tying it to the definition of animal food as regulated by the U.S. Food and Drug Administration.

Thank you for allowing AFIA the opportunity to comment on this issue now as the agency is working on text for the proposed rule. Thank you for considering our suggested language.

Sincerely,

A handwritten signature in cursive script that reads "Leah Wilkinson". The signature is written in black ink and is positioned below the word "Sincerely,".

Leah Wilkinson  
Vice President, Legislative, Regulatory and State Affairs