From: Robin Asher [redacted]
Sent: Friday, July 21, 2017 1:27 AM
To: AMS - GMO Labeling
Subject: GMO Labeling requests

#1. What terms should AMS consider interchangeable with 'bioengineering'? (Sec. 291(1))

"modern biotechnology," "genetic engineering," "GE," "genetic modification," "genetically modified organism," and "GMO"

#2. Which breeding techniques should AMS consider as conventional breeding? (Sec. 291(1)(B)) **none**

#3. Which modifications should AMS consider to be found in nature? (Sec. 291(1)(B)) Products of bioengineering or modern biotechnology, as defined by the FDA, the National Organic Standards Board and others, should not be considered "modifications found in nature." Because **the genetic sequences** that create bioengineered food (genetically-engineered food) are made in a laboratory, are unique and **are not found in nature.** This means that all food produced using gene-editing techniques, such as CRISPR-Cas9, must be subject to labeling.

#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)) YES, and there is no such thing as undetectable, given more advanced detection techniques. In any case, all ingredients go into the body, whether a detectable by an instrument or not!

#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)) See question #1. Include all synonyms.

#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)) However this is done, it should benefit the consumer, not the producer, since that is the intent of the labeling.

#11. Could AMS consider whether a type of food is considered a bioengineered food under the determination process? (Sec. 293(b)(2)(C)) Please do not exclude dietary supplements.

#30. What should the requirements for imports into the United States of products covered by the Law/regulation be? (Sec. 294(a)) Full disclosure would be ideal.

Thanks!

Robin Asher
