



August 11, 2017

The Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave. S.W.
Washington, DC 20250

RE: Proposed Rule Questions Under Consideration for GMO Disclosure and Labeling

CROPP Cooperative (CROPP) respectfully submits the following comments in response to the questions put forth by the USDA to inform proposed rule-making for the labeling of genetically engineered products or ingredients. CROPP is the nation's largest certified organic, independent and farmer-owned cooperative. Organized in 1988, it currently represents 2,000+ certified organic farmers in 36 states and three foreign countries, achieving over \$1 billion in sales during 2017. Focused on its founding mission of saving & supporting family farms through organic farming, CROPP produces a variety of organic foods sold nationwide under several brands. With its regional model, products are produced, processed and distributed right in the regions where they are farmed to ensure fewer miles from farm to table and to support our local economies.

CROPP produces only certified organic products certified by the USDA's National Organic Program (NOP). The organic regulations clearly state that the use of genetically modified organisms throughout the entire supply chain is an excluded method. Certified organic products must be recognized and allowed to label certified organic products as non-GMO in the USDA's proposed rule for labeling products produced with the use of bioengineering. Consumers have clearly expressed their right to know what is in the food they purchase with a high degree of transparency on the part of food manufacturers.

Following are responses to some of the questions put forth by the USDA:

What terms should AMS consider interchangeable with 'bioengineering'? The AMS should consider terms such as "Non-GMO" or other similar phrase to inform consumers the product was produced without any method of bioengineering. This is a common term well understood by consumers.

Will AMS require disclosure for food that contains highly refined products, such as oil or sugars derived from bioengineering? AMS must require disclosure for food that contains highly refined products, such as oils or sugars derived from bioengineered crops. The absence of testable proteins does not exclude a product from transparent labeling. Anything less will not meet consumer expectations.

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 others 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? The proposed rule must not require any changes or modifications to the USDA National Organic Program final rule.

How should AMS craft language in the regulations acknowledging that animals consuming bioengineered feed are exempt from the disclosure requirements as bioengineered solely because they fed on bioengineered feed? AMS should provide clarity that exempt products may not make an absence claim on any product from livestock that was fed bioengineered feed.

What is the amount of a bioengineered substance present in a food that should make it be considered bioengineered? Many products are bound for export to countries that have specific thresholds for bioengineered (GE) contamination. Consistency is necessary to allow for the flow of products to other countries. The threshold worldwide for human consumed foods should be 0.9%.

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? Text disclosure is the preferred method of disclosure. Many consumers do not have the technology to use QR codes or other opaque methods of disclosure. If electronic methods of disclosure are used it is essential to have in store or point of purchase technology available to the consumer.

CROPP Cooperative and our members appreciate the opportunity to comment on some of the questions put forth in consideration of a proposed rule for labeling products produced with genetic engineering.

Sincerely,

Beth Unger
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CROPP Cooperative