



25 August 2017

Mr. Bruce Summers
Acting Administrator
Agricultural Marketing Service
United States Department of Agriculture
1400 Independence Avenue, SW
Room 3069 South Building
Washington, DC 20250

Submitted via GMOLabeling@ams.usda.gov

RE: Proposed Rule Questions Under Consideration (Posted June 26, 2017)

Dear Mr. Summers:

CropLife America (CLA) appreciates the opportunity to provide comments to the United States Department of Agriculture (USDA) Agricultural Marketing Service (USDA-AMS or 'Agency') regarding the development of a rule implementing the National Bioengineered Food Disclosure Law (Law). We welcome USDA-AMS' recognition of the need to establish permissible approaches to communicating about this important technology that provide truthful and not misleading language options for consistent use in such communications.

Established in 1933, CLA represents the developers, manufacturers, formulators and distributors of plant science solutions for agriculture and pest management in the United States. CLA's member companies produce, sell and distribute virtually all the vital and necessary crop protection and biotechnology products used by American farmers, ranchers and landowners. CLA members will be impacted by decisions made with respect to any disclosure language on packaged food and food ingredients.

As a member of the Coalition for Safe Affordable Food (Coalition), and a signatory to its letter in response to the USDA-AMS request (August 25 2017), CLA has provided perspective on several of the specific questions posed by USDA-AMS, and supports the responses of the food value chain represented by the membership of the Coalition. Further, we strongly support the perspectives and specific comments submitted by the Biotechnology Innovation Organization on August 25 2017. As the largest trade association representing the biotechnology industry, BIO has provided comments specific to the terminology, and the scientific and technical distinctions that must be made with respect to the bioengineering technology, and its potential for use in agricultural improvement. Such accurate representation is essential to clarify which food ingredients and whole foods would be covered under this Law, and to ensure meaningful language informs about the technology used.

Representing the Crop Protection Industry

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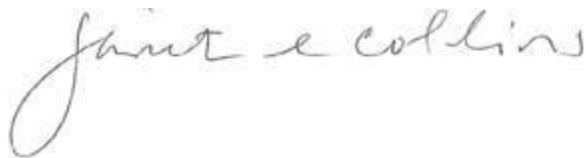
We agree that the language used in defining terms for implementation of the Law will be essential to appropriately establish the accurate use of language without misleading, and without disparaging the technology used to produce food and food ingredients. CLA believes that clear and accurate communication about the safe use of this technology is an important element to innovation in the food system.

We appreciate the opportunity to provide these comments in support of those provided by the Coalition and BIO. We look forward to working with the Agency and affected stakeholders to resolve any differences in approach to conveying information about the positive use of bioengineering technology, and in support of appropriate implementation of the Law.

Should you have any questions or wish to discuss these comments, please contact me directly by email, jcollins@croplifeamerica.org, or telephone, (+1) 202-833-4474.

Thank you for your consideration of these comments.

Respectfully,

A handwritten signature in cursive script that reads "Janet E. Collins". The signature is written in dark ink and is positioned above the typed name and title.

Janet E. Collins, Ph.D., R.D.
Executive Vice President, Science and Regulatory Affairs