RESPONSE to Government Public Opinion Period. Regarding the **New GMO Regulations,**

- Deb Martin and Larry Witzleben, Fort Myers, FL concerned citizens and natural medicine practitioners.

From website address: https://www.ams.usda.gov/rules-regulations/gmo-questions

Sent to GMOlabeling@ams.usda.gov

Date Due and Date Sent: 7-17-17

Question 1. None. GMO is GMO.

2. Splicing and hybridizing, as has been done for hundreds of years. Anything else is GMO.

3. If it's modified other than via hybridizing, it should be specified by what method it is changed.

4. Should be required.

5.Yes, this will cause confusion. Government-speak can inherently invite confusion. It's deliberate. The solution? See #12. Be few in allowable words; be succinct and strict in definitions.

6. That's dishonest and starts from a policy that hides what consumers should know. The formula the AMS will use will serve the industry it's meant to regulate.

7. That's dishonest, too.

8. Any amount.

9. Artificial additives (to include synthetic even if they meet some arbitrary government definition of "natural.")

10. Out of my expertise to know. Our thought is that if anything is bioengineered, it should be listed as such.

11. No. If it's Bioengineered, it should be disclosed. There's nothing else to be "determined". It is, or it isn't, in some part, GMO.

12. One standard text with the label "GMO" is our strong preference. Choice invites dishonesty. There's legal, then there's truly honest.

Fully* bioengineered, ***partially*** bioengineered, ***may be*** bioengineered. A little bit pregnant. And if it's ***may be***, we know that that gives manufacturers the latitude and (legal) cover to hide what they do. Fox guarding henhouse. The use of *these phrases should be discontinued in the interest of disclosure.

Even saying "full disclosure" or "partial disclosure" is gaming the consumer. Now we have to define "acceptable" percentage of watering-down to fit definition. Where does it end?

13. One that strict organic-food constructionists agree upon.

14. Too many hoops to jump through to get the needed information. (See #13.)

15. See #13. Grandfather in the old and mandate adherence to the new technology moving forward. This is a Catch-22, for you want the consumer to have (access to) the latest data. A link that is an old but still working technology and a link that no longer links are two different things. We don't want to leave the consumer with a link that no longer links. But we also don't want to hastily decree an old labeling not shelf-worthy, for that is to lock in an expensive recall practice that will further drive up the cost to the consumer and perhaps leave product off the shelf for too long. The transition must be carefully thought out, something for which bureaucracies are not famous. See #25.

16. This is getting out of hand and unwieldy.

17 and 18. This should be driven by what is a reasonably small-enough font and the ability to have fold-over labels to disclose more. See #25.

18. See #13.

19. Use existing federal guidelines.

20. See #14.

21. Use the "Reasonable man" legal concept.

22. Use existing Federal definitions.

23. This is becoming cumbersome and silly. Before long, the cost of products will be driven by the size of containers required for all the labeling. Use simple, straightforward wording intentionally chosen for willing, full disclosure. See #25.

24. Require reasonably (#21) "consistent, conspicuous" placement. A label is only so big, and a concerned consumer will look over the whole label, inside and out. See #25.

25. Work with graphics and IT people committed to full, consumer-friendly disclosure.