

From: [Alison Nihart](#)
To: [AMS - GMO Labeling](#)
Subject: GMO Labeling input
Date: Monday, July 17, 2017 10:53:27 AM

To whom it may concern:

I am writing to share my input on the GMO Labeling law. I have ordered my input below based on the numbered questions on this page: <https://www.ams.usda.gov/rules-regulations/gmo-questions>

#4: Yes. Products containing any GE ingredients should be required to be labeled. Many people want to know about GE ingredients in their food because they want to avoid certain production practices, not just the presence of GE in the food itself.

#8: A label should be required if any ingredient is produced with GE, with indication on the label which ingredient(s) were produced with GE.

#9: Multiple disclosures would be beneficial to indicate the likelihood an ingredient was produced with GE:

- for multi-ingredient products, a symbol next to the GE ingredient should indicate so, along with explanatory text associated with that symbol
- same for GE-derived ingredients
- for variation due to seasonality, language could indicate that the ingredient MAY be GE
- additional disclosure categories should be used to indicate which category of GE was used: herbicide resistance, pesticide gene (Bt), drought resistance, etc. (For me, this is the deciding factor on whether or not I am ok purchasing a GE product - I am fine with GE that supports resistance to drought, but not herbicide resistance)

#11: Medical food and dietary supplements should not be excluded, but label should indicate what type of GE was used

#12: I support the use of the Consumer Protection Rule language; however, I would like to see this specific to the relevant ingredient AND additional information provided as to the type of GE used (as indicated above). There should be standard phrases that manufacturers are required to use, and they should be required to use that language next to the ingredients list

#13: Perhaps a DNA helix?

#14: Digital disclosure should not be allowed as the primary indication of whether a product includes GE ingredients. A URL should be provided only for additional details.

#15: Yes. A URL. A QR code should not be allowed. They are already out of fashion.

#18: Yes, a symbol plus a URL.

#24: Text should be sized at the same size as ingredients list and/or nutrition facts.

#25: Do not use a scan reader. Use a URL so any type of device can access it. Scan readers will come in and out of fashion.

#27: Request submission of image of the label, and solicit photographs from multiple geographic locations showing that product with that label on the shelf.

#29: Make a report available on the AMS website.

#30: Imported products should be required to comply with the law.

Thank you very much for considering my input.

Alison Nihart
Middlebury, Vermont