

Sent: Wednesday, August 09, 2017 5:34 AM
To: AMS - GMO Labeling
Subject: [CAUTION: Suspicious Link]Comments re GMO labeling

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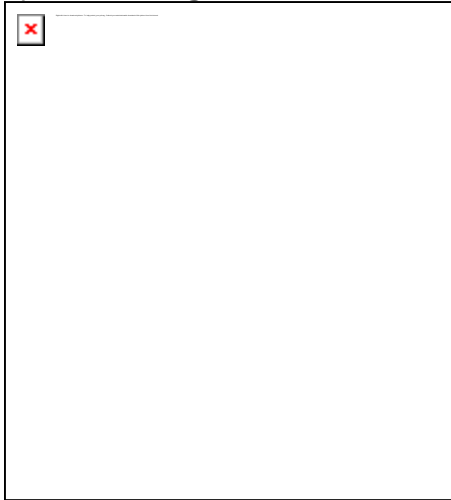
Questions: Spam.Abuse@wdc.usda.gov

I agree with the points made in the following article by Max Goldberg. I have copied and pasted his article to you rather than paraphrase. Thank you for your role in keeping agriculture practices clear and open to the public. We need to know how our food is produced and what we are eating!!
Mary Tolmie from Stockton Village Farm in New Jersey

All Forms of Genetic Engineering Must Require Labels

[Organic Insider by Living Maxwell](#)

by Max Goldberg



(Please note: Even though I have tried to simplify it as much as I could, today's email is more technical than all of my other weekly emails. However, GMO-labeling is an extremely important issue and one that organic food companies have spent tens of millions of dollars on.)

As the USDA prepares to roll out its GMO-labeling law, which goes into effect in 2018, it is seeking input from stakeholders and [has posed 30 questions](#) regarding key issues of this bill.

This input will provide valuable guidance as the agency writes a formal draft of the law, which the public will be able to comment on as well.

Michael Hansen, Ph.D., Senior Scientist at [Consumers Union](#) and arguably the preeminent expert in our industry when it comes to GMOs, genetics and all things labeling, released Consumers Union's official comments on Friday, and I believe its key points below are the ones that organic advocates should focus on when

submitting their own opinions to the USDA.

* **DEFINING THE TERM "BIOENGINEERING"** Last year, on July 29, 2016, Congress passed P.L. 114-216, the National Bioengineered Food Disclosure Standard, which requires disclosure if a food product contains bioengineered (genetically-engineered) materials.

As you can imagine, there was a lot of debate about what "bioengineered" exactly means.

In order to close a possible loophole where a food company could say that its products are not "bioengineered" but "genetically-modified" and, therefore, should not be labeled, the USDA should recognize a limited number of alternative terms that all mean the same thing.

More specifically, “modern biotechnology,” “genetic engineering,” “GE,” “genetic modification,” “genetically modified organism,” and “GMO” should be interchangeable with “bioengineering.” Other governmental agencies already recognize and use these terms.

*** GENETIC ENGINEERING DOES NOT CREATE MODIFICATIONS FOUND IN NATURE** Under Section 291(1)(B) of the law, it references “modifications found in nature.”

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.”

Why?

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.

DETECTION IS NOT ESSENTIAL Some food companies may say that if genetic material from a highly refined, bioengineered product (soy oil, for example) is not detectable, then it is not there and shouldn’t be labeled.

This is flawed, and the courts have agreed.

It just means that today’s technology cannot detect it, and technology that comes out in the next few years could very well detect it.

As a result, these highly refined products should be labeled. It was also the clear intent of Congress to cover highly refined products.

GMO THRESHOLD SHOULD BE 0.9% Consistent with the European Union and many countries throughout the world, the threshold for the amount of genetically–engineered material in a food should be 0.9%.

Using this globally accepted threshold will facilitate international trade.

GMO–SUPPLEMENTS MUST BE LABELED The USDA must not exclude dietary supplements from labeling requirements since dietary supplements are generally considered foods by the FDA, are widely consumed and may be bioengineered. (As a side note, I hear that one of the real problem areas for Whole Foods – in [its plan to label all GMOs by 2018](#) – has been supplements. GMOs are so ubiquitous in supplements that finding Non–GMO sources of ingredients, such as maltodextrin (corn), is a huge issue.)

While there are plenty of other areas to comment on, the ones above, according to Michael Hansen, are the most crucial.

And I agree.

Despite the fact that using QR codes instead of on–packaging labels is discriminatory (not everyone can afford or uses a smartphone), they have been approved by Congress in this GMO–labeling law.

Yet, it is best to discuss how QR codes should be administered once we see a draft of the law and after Deloitte’s digital disclosure study has been submitted to the USDA by July 28th.

What’s important now is to make sure that **the USDA includes all gene–editing technologies** in this labeling law.

Feel free to use any or all of the points above when submitting your comments to the USDA. If you'd like to see Consumers Union's full comments, they are posted [HERE](#).

It is essential that the USDA hears from as many of us as possible because the other side will be working feverishly to slip in as many loopholes as they can.

Comments should be submitted today to: GMOLabeling@ams.usda.gov