From: Indivisible Ukiah
To: AMS - GMO Labeling
Subject: The National Bioengineered Food Disclosure Standard
Date: Sunday, July 16, 2017 6:29:28 PM

Hi,

I am a concerned citizen that is really wanting to know what I am eating.

1. What terms should AMS consider interchangeable with 'bioengineering'? (Sec. 291(1))

Call it GMO.

2. Which breeding techniques should AMS consider as conventional breeding? (Sec. 291(1)(B))

Natural breeding. Adding and removing genes artificially is not conventional.

3. Which modifications should AMS consider to be found in nature? (Sec. 291(1)(B))

None. You don't find them in nature.

4. Will AMS require disclosure for food that contains highly refined products, such as oils or sugars derived from bioengineered crops? (Sec. 291(1)(A))

Of course! These are the products that will be eaten by most people and will have the biggest impact on peoples health. This shouldn't even be a question.

5. 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 other 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? (Sec. 292(b))

If you are serious about creating a law that will protect consumers, you will make this law cover other agencies and their terms for GMO or bioengineering. This is not a big headache. However, if this law is to protect big corporations, then you have a problem.

6. Meat, poultry, and egg products are only subject to a bioengineered disclosure if the most predominant ingredient, or the second most predominant ingredient if the first is broth, stock, water, or similar solution, is subject to the labeling requirements under the Federal Food, Drug, and Cosmetic Act. How will AMS determine the predominance of ingredients? (Sec. 292(c))

You label the product with what is in the product! This is not rocket science. What it contains, is what is on the label. For me as a consumer, I want to know what I am eating.

7. How should AMS craft language in the regulations acknowledging that the Law prohibits animal products from being considered bioengineered solely because the animal consumed feed products from, containing, or consisting of a bioengineered

substance? (Sec. 293(b)(2)(A))

If an animal have been raised on GMO products, then I would REQUIRE that to be on the label. The food is not just going through the animal without leaving toxins in the body.

8. What is the amount of a bioengineered substance present in a food that should make it be considered bioengineered? (Sec. 293(b)(2)(B))

Any amount! Tell in clear language how much of it is GMO and how toxic it is.

9. Should AMS consider more than one disclosure category? (Sec. 293(b)(2)(D))

Tell people what it is in plain and clear language and have them make the decision on whether to buy it or not.

10. What other factors or conditions should AMS consider under which a food is considered a bioengineered food? (Sec. 293(b)(2)(C))

All content should be easily read on the package. If more information is needed about something, add a link on the package. However, I want to go to the store and hold up the package and know what is in there. I would not buy a product where I have to go to a web site in order to find out that whether it contains GMO or not.

Who are the stakeholders? You where created to protect consumers in the U.S. Anyone else is supposed to follow your directions.

11. Could AMS consider whether a type of food is considered a bioengineered food under the determination process? (Sec. 293(b)(2)(C))

No. Everything is disclosed on all products.

12. If a manufacturer chooses to use text to disclose a bioengineered food, what text should AMS require for a text disclosure? (Sec. 293(b)(2)(D))

I support the wording from the State of Vermont. It is clear and concise. Standardize and make it the same for everyone.

Currently, some food manufacturers use language compliant with the Consumer Protection Rule 121 from the State of Vermont to identify their food products as bioengineered ("Produced with Genetic Engineering," "Partially Produced with Genetic Engineering," or "May be Produced with Genetic Engineering"). AMS is considering whether to allow manufacturers to continue using these disclosures under the new national bioengineered disclosure standard and if their language is appropriate. Further, AMS is considering what phrases could be used as a text disclosure for bioengineered food that consumers would find informative, truthful, and not misleading.

AMS is also considering whether there should be one standard text disclosure language, or whether manufacturers should be allowed flexibility to choose from more than one acceptable phrase and where the bioengineered food disclosure should be placed on food packages.

13. If a manufacturer chooses to use a symbol to disclose a bioengineered food, what symbol should AMS require for disclosure? (Sec. 293(b)(2)(D))

A big warning sign. GMO would be fine. It can scale up and down and most people will understand it right away. Must be easily readable on the package.

14. 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? (Sec. 293(b)(2)(D))

Compatible with all phones or computers. However, my suggestion would be to mark it GMO on the packaging and then have a link for more information.

15. Should AMS specify in the regulations the type of electronic or digital disclosure manufacturers, e.g. QR code, can use to disclose bioengineered food? What steps should AMS take if an electronic or digital disclosure method becomes obsolete? (Sec. 293(b)(2)(D))

Yes. And it should put in to the regulation that the manufacturers have to use what is the current easy technology for consumers.

16. What kind of text, symbol, or electronic or digital disclosure should AMS require for bioengineered food that is not purchased from a grocery store shelf, such as food for sale in bulk (such as fresh produce in a bin or fresh seafood at a fish counter), in a vending machine, or online? (Sec. 293(b)(2)(D))

GMO. GMO-based. GMO-fed. etc. Doesn't take up much space and can easily be placed anywhere. I am absolutely sure that this can be done.

17. The Law offers special provisions for disclosure on very small or small packages. How should AMS define very small or small packages? (Sec. 293(b)(2)(E))

Even on small packages like these, you can squeeze in a symbol for GMO or just the three letters: GMO.

AMS is considering if it should mirror FDA's treatment of very small and small packages for nutrition labeling.

a. In 21 CFR 101.9(j)(13)(i)(B), FDA defines small packages as those with less than 12 square inches in total surface area available to bear labeling.

b. FDA also has allowances for packages that have less than 40 square inches of total surface are available to bear labeling.

18. What are the reasonable disclosure options AMS should provide for food contained in very small or small packages? (Sec. 293 (b)(2)(E))

a. No. You can always add GMO. Then you can add whatever is necessary.

b. Yes. GMO.

19. How should AMS define small food manufacturers? (Sec. 293(b)(2)(F))

I don't care about small food manufacturers definition. All of manufacturers should disclose

what is in their products.

20. For disclosures by small food manufacturers, what is the appropriate language indicating that a phone number provides access to additional information? (Sec. 293(b)(2)(F)(ii)(I))

More information: 000-000-0000

21. The Law excludes restaurants and similar retail food establishments from disclosure requirements. How should AMS define similar retail food establishment to exclude these establishments from the requirements of the regulation? (Sec. 293(b)(2)(G)(i))

No exclusions.

22. How should AMS define very small food manufacturers to exclude these manufacturers from the requirements of the regulation? (Sec. 293(b)(2)(G)(ii))

You don't exclude anyone.

23. Is there other equivalent on-package language that AMS should consider to accompany an electronic or digital disclosure besides "Scan here for more food information"? (Sec. 293(d)(1)(A))

24. How should AMS ensure that bioengineered food information is located in a consistent and conspicuous manner when consumers use an electronic or digital disclosure? (Sec. 293(d)(2))

At the top of ingredients.

25. How should AMS ensure that an electronic or digital disclosure can be easily and effectively scanned or read by a device? (Sec. 293(d)(5))

26. What types of records should AMS require to be maintained to establish compliance with the regulations? (Sec. 293(g)(2))

All records.

27. How should AMS obtain information related to potential non-compliance with these regulations? Is there information USDA should request prior to conducting an examination of non-compliance? (Sec. 293(g))

Test the food. You can ask first to get all documentation, but they might withhold it if they are using illegal substances.

28. What are the rules of practice for a hearing? (Sec. 293(g)(3)(B))

You should have enough experience to figure that one out.

29. How should AMS make public the summary of any examination, audit, or similar activity? (Sec. 293(g)(3)(C))

You make it available in PDF form, video etc. depending on what material will provide background and evidence of examinations, audits etc.

30. What should the requirements for imports into the United States of products covered by the Law/regulation be? (Sec. 294(a))
Just the same as for U.S. grown products. And for ALL products.

Finn Alden