

July 3, 2018

The Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Re: AMS-TM-17-005-0004

Dear Secretary Perdue,

The undersigned 42,671 supporters, along with Just Label It, call on the USDA to implement a clear, consumer-friendly final GMO disclosure rule.

Specifically, the final rule implementing the national, mandatory GMO disclosure law should:

- 1) **Disclose all GMOs:** All GMO foods – including foods with GMO ingredients like refined sugars and oils, and foods with ingredients derived from all forms of genetic engineering like CRISPR and RNAi – must carry GMO disclosures. The draft rule leaves it open for the USDA to decide whether or not to include ALL GMOs, but that should not be up for debate. Additionally, the final rule must adopt a 0.9 percent threshold so that the U.S. GMO disclosure rule is consistent with international standards.
- 2) **Use terms that consumers understand:** The proposed rule uses the term “bioengineered” (BE), instead of “genetically modified” (GMO) or “genetically engineered” (GE) – the most common terms for genetically altered foods. The USDA should use the words consumers already know and those consistent with the disclosure standards established by other countries.
- 3) **Include strong rules for digital disclosures:** The proposed rule has limited guidelines for regulating digital or electronic disclosures. If companies decide to use a digital disclosure, there should be **STRONG** rules for size, color and material requirements to ensure success every time a product is scanned.
- 4) **Provide comparable options:** Twenty million Americans live without adequate cell service, but the proposed rule does not provide comparable options for these consumers as required by the law. Retailers must provide scanners in every aisle of stores for consumers who do not have smartphones or who lack reliable cell service.

We are counting on USDA to correct the issues mentioned above, and ensure that American consumers get the information they need about GMOs in the simplest way possible.

Yours sincerely,