

May 8, 2013

We write to convey strong opposition to legislation recently introduced that would require special labels for food and beverages that contain ingredients derived from biotechnology or genetically engineered plants.

There is no scientific basis to justify mandatory labeling solely on the basis of genetic engineering. Regardless of the intent of the bill's proponents, this label would likely confuse and unnecessarily alarm consumers, provide no health or safety benefits, and have significant negative effects on agricultural productivity, resource use efficiency, weather risk management, farmer profitability, and the environmental protection gains made possible by the adoption of biotechnology.

In the United States, we have almost 20 years of experience in the safe use of biotechnology-derived crops for human and animal food. Current law provides for a rigorous, science-based regulatory framework for agricultural biotechnology products coordinated by government agencies, including the U.S. Department of Agriculture (USDA), the U.S. Environmental Protection Agency (EPA), and the U.S. Food and Drug Administration (FDA).

The FDA, the federal agency with primary responsibility for ensuring the safety of our food, has declared these ingredients to be of no material difference to conventional ingredients and, therefore, does not require special labeling. In fact, FDA has stated that the labeling of products to indicate the presence of ingredients derived from genetically engineered plants would be "inherently misleading" to consumers.

Other entities, such as the World Health Organization (WHO), the Food and Agriculture Organization of the United Nations (FAO), and other independent scientific bodies have evaluated the safety of products of modern biotechnology, including ingredients derived from them, and have concluded that they are as safe as their conventional counterparts.

The labeling of products conveys to consumers important information concerning ingredients, nutrition parameters, allergens and safe use of the product. Special labeling for the presence of ingredients derived from genetically engineered plants does not provide consumers with any significant or useful information. In addition, and contrary to FDA guidance and scientific evidence, these special labels may mislead consumers into believing that products are somehow materially different or even dangerous.

Current FDA guidance provides the ability for food companies to market products that do not contain genetically engineered plants in response to specific consumer preferences. A vibrant, growing market exists today for products with the USDA Organic seal or other clearly visible, truthful, and not misleading labels stating the product was not produced with or does not contain ingredients derived from genetically engineered plants.

Food and beverage manufacturers are committed to providing consumers with the information they need to make safe and healthy choices for them and their families. The limited space on the food label is the most effective tool for delivering that information. A special mandatory label for food and beverages that may contain ingredients derived from genetically engineered plants will almost certainly mislead consumers, while providing no corresponding health or environmental benefits. Moreover, amending our nation's food laws should be an exercise based upon credible scientific evidence, and there is none that supports the labeling requirement outlined in the legislation recently introduced in Congress.

For these reasons, we urge you to oppose legislation that would require mandatory labeling of foods and beverages that may contain ingredients derived from genetically engineered plants.

AACC International  
Agricultural Retailers Association  
American Bakers Association  
American Beverage Association  
American Farm Bureau Federation  
American Feed Industry Association  
American Frozen Food Institute  
American Meat Institute  
American Phytopathological Society  
American Seed Trade Association  
American Soybean Association  
American Sugarbeet Growers Association  
American Veterinary Medical Association  
Biotechnology Industry Organization  
Global Cold Chain Alliance  
Grocery Manufacturers Association  
Institute of Shortening and Edible Oils  
International Association of Refrigerated Warehouses  
International Dairy Foods Association  
International Formula Council  
National Association of Manufacturers  
North American Meat Association  
North American Millers' Association  
National Association of Wheat Growers  
National Confectioners Association  
National Corn Growers Association  
National Corn Refiners Association  
National Cotton Council  
National Council of Farmer Cooperatives  
National Fisheries Institute  
National Grain and Feed Association  
National Milk Producers Federation

National Oilseed Processors Association  
Snack Food Association  
U.S. Beet Sugar Association  
U.S. Chamber of Commerce