

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