

November 17, 2017

Dockets Management Staff
(HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: Notice, Docket No. FDA-2017-N-5991, Agricultural Biotechnology Education and Outreach Initiative; Public Meetings; Request for Comments

To Whom It May Concern:

The North American Meat Institute (NAMI or Meat Institute) is the leading voice for the meat and poultry industry. The Meat Institute has a rich, century-long history and provides essential member services including legislative, regulatory, scientific, international, and public affairs representation. Together, the Meat Institute's members produce the vast majority of U.S. beef, pork, lamb, and poultry, in addition to the equipment, ingredients, and services needed to produce the safest and highest quality products.

The Meat Institute and its members often field questions about the use of biotechnology in food products. A better understanding of biotechnology and its use in plant and animal agriculture is needed and appropriating funds to provide consumer outreach and education is a critical first step in educating consumers. Coordination among the Food and Drug Administration (FDA), the United States Department of Agriculture (USDA), and the Environmental Protection Agency (EPA) is important in developing this initiative because each agency has significant scientific information to contribute. The collaboration between FDA and USDA is especially important because rulemaking for the National Bioengineered Food Disclosure Law (Disclosure Law) will soon begin.¹ As USDA navigates this rulemaking process the Meat Institute urges the agencies to build their education and outreach programs to complement the changes that will come with implementation of the rule. Additionally, the Meat Institute submits these comments in response to the questions posed in FDA's above-referenced notice (Notice).

¹ United States Department of Agriculture Agricultural Marketing Services: GMO Disclosure & Labeling. <https://www.ams.usda.gov/rules-regulations/gmo>. Accessed 16 November, 2017.

Responses to the Questions Posed in the *Federal Register* Notice

1. What are the specific topics, questions, or other information that consumers would find most useful, and why?

The most important information the agencies should share with consumers is the meaning of terms currently used to describe biotechnology. Phrases such as “genetically modified,” “gene-editing,” and “bioengineering” are not common in the vocabulary of most consumers today, and consumers would likely appreciate a straightforward approach to defining such terms. Research shows that, while most United States consumers are unfamiliar with genetically modified foods, a majority hold negative perceptions of those foods.² Therefore, information on the safety and benefits of biotechnology may help mitigate some of the perceived risks of its use in food production. Such information can be shared throughout the rulemaking process for the Disclosure Law to 1) provide transparency in the process and 2) inform consumers.

2. Currently, how and from where do consumers most often receive information on the subject?

Research shows that consumers most often receive information on genetically modified organisms (GMOs) from the internet, the media (television and newspapers), and people they know.³

3. How can FDA (in coordination with USDA) best reach consumers with science-based educational information on this subject?

Using established platforms of information-sharing is best for reaching consumers. Because consumers most often receive information on GMOs and other biotechnologies from the internet, the media, and people around them, the agencies should use these platforms that are already accessed by consumers. All three agencies have established social media pages on multiple sites and the agencies frequently field media requests. In addition, agency employees have their own “circles” of friends, relatives, and others with whom they can share this information—agency employee buy-in is as important as the message the agency shares. The agencies’ scientists must translate the hard scientific information into an easily-read and understood message for consumers, and the agencies must try to

² Hallman, WK, CL Cuite, and XK Morin. 2013. Public perceptions of labeling genetically modified foods. Rutgers School of Environmental and Biological Sciences. http://humeco.rutgers.edu/documents_PDF/news/GMlabelingperceptions.pdf. Accessed 16 November, 2017.

³ Wunderlich S and KA Gatto. 2015. Consumer perception of genetically modified organisms and sources of information. *Adv. Nutr.* 6: 842-851.

distribute such messages through the aforementioned avenues. Additionally, these efforts can be aligned with the implementation of the Disclosure Law, which will require the distribution of information and clarification on bioengineered food products. The agencies already have information-sharing platforms in place. They must use these to their advantage, to ensure that a truthful and detailed message on biotechnology is passed along to consumers.

The Meat Institute Supports the Distribution of a Truthful, Meaningful Message on the Use of Biotechnology in Food Production.

Consumer trust is of the utmost importance to Meat Institute members. The efforts by FDA, USDA, and EPA to increase consumer education and outreach are very important to the future of the food-production landscape. Shedding a positive light on biotechnology, alleviating consumer concerns, and implementing a transparent and detailed rulemaking process for the Disclosure Law should help the public better understand the importance of, and the science behind, the use of biotechnology in agriculture.

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I would be happy to discuss these comments, the Meat Institute's position regarding the Request, or answer questions.

Respectfully submitted,



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North American Meat Institute

cc: Barry Carpenter
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Susan Backus