



July 3, 2018

United States Department of Agriculture  
Agricultural Marketing Service  
Docket Clerk  
1400 Independence Avenue, SW  
Room 4543 - South  
Washington, DC 20250

*Submitted via [www.regulations.gov](http://www.regulations.gov)*

RE Proposed Rule – National Bioengineered Food Disclosure Standard – Doc. No. AMS-TM-17-0050 (83 Fed. Reg. 19860 (May 4, 2018))

Dear Sir/Madam:

The National Corn Growers Association appreciates the opportunity to comment on the USDA Agricultural Marketing Service's ("AMS") proposed rule to implement the National Bioengineered Food Disclosure Standard, Pub. L. 114-216, (the "NBFDS" or "Act").

Founded in 1957, NCGA represents approximately 40,000 dues-paying corn growers and the interests of more than 300,000 farmers who contribute through corn checkoff programs in their states. NCGA and its 49 affiliated state associations and checkoff organizations work together to help protect and advance corn growers' interests.

Corn growers are striving to increase transparency in corn production and are engaged on several fronts defining our continuous improvements in sustainability. Many of these gains over the last 20 years are due to technology advancements including seeds derived from transgenic biotechnology that offer improved water and nutrient use efficiency by better protecting crops while decreasing pesticide use. While this technology has no impact on the safety or nutritional content, we do recognize that there is a demand by the public to understand when this technology is used and is present in final food products. We support honest, accurate and unbiased labeling and as members of the Coalition for Safe Affordable Food, we support many of the Coalition's comments and recommendations on the NBFDS.

However, as referenced in the Coalition's comments, the members of the Coalition have diverging views on mandatory disclosure of refined ingredients, the BE food list, voluntary disclosure, and thresholds. In separate comments, with other national agricultural groups and their state affiliates, we explained our unified and strongly held position on each of those issues.

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**NATIONAL  
CORN GROWERS  
ASSOCIATION**

We applaud AMS for attempting to address stakeholders' competing views on the scope of the NBFDS by setting forth a number of options for the final rule. Our overriding concern, however, is that some of the options being considered, if adopted, have the potential to harm U.S. agriculture and stifle American farming innovation by presuming or implying that refined ingredients like sugars and oils, derived from a BE crop, contain genetic material when sound science shows they do not. Above all else, AMS must ensure that the NBFDS is a marketing standard, not a health, safety, or nutritional standard. Congress expressly recognized that "the comprehensive federal review process has determined that foods produced using bioengineering are safe and not materially different in any way from those made using other methods."<sup>1</sup>

We appreciate your thoughtful consideration of our submissions and stand ready to answer further questions or supplement additional details should you request them.

Respectfully submitted,

National Corn Growers Association

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<sup>1</sup> S. Rep. No 114-403 (2016) at 2.

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