



October 24, 2016

Docket Clerk
USDA-Food Safety and Inspection Service
Patriots Plaza 3
1400 Independence Avenue, SW
Mailstop 3782, Room 8-163B
Washington, DC 20250-0268

Docket: FSIS-2016-0027

RE: Statements that Bioengineered or Genetically Modified (GM) Ingredients or Animal Feed Were not Used in the Production of Meat, Poultry, or Egg Products

Thank you for this opportunity to provide comment on the USDA Food Safety and Inspection Service's (FSIS) recently released guidance on Statements that Bioengineered or Genetically Modified (GM) Ingredients or Animal Feed not Used in the Production of Meat, Poultry, or Egg Products.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 50 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA appreciates FSIS' swift action in response to recently passed legislation requiring USDA to develop and implement a mandatory national bioengineered food disclosure standard within 2 years. As you know, certified organic products are third-party verified by agents accredited under USDA-Agricultural Marketing Service's National Organic Program. All organic products, including meat, poultry, and egg products, must demonstrate that they were not produced using "excluded methods" (7 CFR 205.2) which includes bioengineering or genetically modification. This revised guidance recognizes that a valid organic certificate, alone, will be sufficient documentation to substantiate a "non-GMO" claim on an FSIS inspected product. The organic industry appreciates FSIS' new approach to this label claim and for granting a streamlined process for approving non-GMO label claims based on organic certification.

On behalf of our members across the supply chain and the country, OTA thanks the Food Safety and Inspection Service for the opportunity to comment.

Respectfully submitted,

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cc: Laura Batcha
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