



Consumer Federation of America

November 23, 2011

Margaret A. Hamburg
Commissioner
U.S. Food and Drug Administration
10903 New Hampshire Ave.
Silver Spring, MD 20993

RE: Docket # FDA-2011-P-0723-0001/CP

Dear Commissioner Hamburg,

The Consumer Federation of America (CFA) appreciates the opportunity to comment on a petition submitted by the Center for Food Safety petitioning the Food and Drug Administration to require labeling for genetically engineered food (**Docket No. FDA-2011-P-0723-0001/CP**).

CFA is an association of nearly 300 non-profit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy and education. Member organizations include local, state, and national consumer advocacy groups, senior citizen associations, consumer cooperatives, trade unions and food safety organizations. CFA's Food Policy Institute was created in 1999 and engages in research, education and advocacy on food safety, agricultural biotechnology, food and agricultural policy, and nutrition.

CFA supports the mandatory labeling of genetically engineered food and urges the agency to act in favor of the CFS petition. Consumers have a fundamental right to know what is in the food they purchase for themselves and their family. Consumers are provided with and frequently use nutrition and basic ingredient information, information about allergens, information about country of origin for agricultural commodities, and information about whether food meets USDA organic standards. However, under current FDA regulations, consumers are not provided information about genetically engineered (GE) ingredients, despite public interest in making that information available.

Public opinion polls show overwhelming consumer support for labeling of GE foods. A June 2011 ABC News poll found that 93% of the American public wants the federal government to require mandatory labeling of GE foods.¹ An October 2010 Thomson Reuters survey found similar levels of support of GE labeling.² In addition, a Consumers Union poll from November 2008 found that 95% of consumers

¹ ABC News poll, June 2011, 6/11, <http://abcnews.go.com/sections/scitech/DailyNews/poll010619.html>

² Thomson Reuters/NPR poll, October 2011,
http://www.factsforhealthcare.com/pressroom/NPR_report_GeneticEngineeredFood.pdf

believed that GE foods should be labeled.³ As consumers become increasingly interested in what is in their food and where it is coming from, consumers are asking for more information, not less.

Genetically engineered foods are required to be labeled in the 15 European Union nations, Russia, Japan, China, Australia, New Zealand, and many other countries around the world. U.S. consumers should be provided the same basic information about GE foods as consumers in these other countries.

Consumers have a basic right to know what is in their food. Without labeling, consumers are unable to make an informed choice when they are shopping for food for themselves and their family. We urge the FDA to act favorably on the CFS petition and require the labeling of genetically engineered food.

Sincerely,

A handwritten signature in black ink that reads "Chris Waldrop". The signature is written in a cursive, flowing style.

Chris Waldrop
Director, Food Policy Institute

³ Consumers Union, Food Labeling Poll 2008, November 11, 2008,
<http://www.greenerchoices.org/pdf/foodpoll2008.pdf>