



NON GM Seed Forum  
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## Comments on a Proposed Bioengineered Food Disclosure Rule

NON GM Seed Forum is a citizens' group, comprised of twenty-one groups, such as co-op and citizens' group, and one-hundred fifty members.

We engage in educational activities on foods, agriculture, genetic modification and genome editing and call for reform of law on labeling system of genetically modified foods.

Regarding the 30 questions for consideration by interested stakeholders on the proposed rule on GMO labeling, I am sending you our comments on the questions which are of strong interest to Japanese consumers.

Japan is one of your major export markets, as we import a great deal of food in the form of farm products from the United States. The trend of GM labeling in the United States will have a huge impact on Japanese consumers and manufacturers as well. That is why I decided to send my comments on this occasion.

### Comments

1. GMO labeling must be clear and on the package, using text and not a QR code. (Questions 14, 15, 16)

While the National Bioengineered Food Disclosure Law includes potential options other than on-package labeling, such as QR codes and websites, only on-package labeling provides easy access to all consumers. It is reported in Japan that 78% people between the ages of 15-49 have a smartphone, and only 40% of seniors (age 60-79) own a smartphone. Even those who do own smartphones are not guaranteed consistent access to the internet. At the end of the day, a substantial number of consumers would be deprived of their right to know if GMO labeling were to be carried out through QR codes. In order to ensure information disclosure for consumers in a fair manner, GMO labeling must be on the package, using text and not a QR code.

2. All GMOs must be labelled. (Questions 2, 3, 4, 10)

The labeling law should ensure that ALL foods produced through genetic engineering are labeled based on traceability, including highly refined GE sugars and oils as well as processed corn and soy ingredients, even if they are so highly processed that the altered gene and proteins thereof are not detectable in the final product.



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3. GMOs must be labelled in a timely fashion.

We strongly request that USDA will meet its deadline of proposed and then final rules by July 29, 2018. Many major food companies are already labeling GMOs at a voluntary level. We sincerely hope that USDA will require GMO labelling as initially planned without delay.

Thank you.

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Co-chairperson