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The Association of Food, Beverage and Consumer Products Companies

February 22, 2012
MEMORANDUM OF OPPOSITION

Connecticut H.B. 5117, AN ACT CONCERNING GENETICALLY-ENGINEERED FOODS

On behalf of the Grocery Manufacturers Association (GMA), I would like to take this opportunity to register our opposition to H.B. 5117, An Act concerning genetically-engineered foods. GMA and its member companies oppose this legislation because the concept labeling of such food products as "genetically engineered" is redundant to federal law and presupposes an issue with food safety, which would only serve to undermine consumer confidence in safe products and discourage investment in science, and technology that could bring about more efficient production and more nutritious foods.

Based in Washington, D.C., the Grocery Manufacturers Association is the voice of more than 300 leading food, beverage and consumer product companies that sustain and enhance the quality of life for hundreds of millions of people in the United States and around the globe.

Founded in 1908, GMA is an active, vocal advocate for its member companies and a trusted source of information about the industry and the products consumers rely on and enjoy every day. The association and its member companies are committed to meeting the needs of consumers through product innovation, responsible business practices and effective public policy solutions developed through a genuine partnership with policymakers and other stakeholders.

In keeping with its founding principles, GMA helps its members produce safe products through a strong and ongoing commitment to scientific research, testing and evaluation and to providing consumers with the products, tools and information they need to achieve a healthy diet and an active lifestyle.

The food, beverage and consumer packaged goods industry in the United States generates sales of $2.1 trillion annually, employs 14 million workers and contributes $1 trillion in added value to the economy every year.

GMA's members hold the safety and integrity of the products they make, and the ingredients used to make them, as most important. GMA supports a rigorous, science-based federal regulatory framework for agricultural biotechnology products. This framework is currently provided through a coordinated structure of government agencies, including U.S. Department of Agriculture, U.S. Environmental Protection Agency (EPA), and the Food and Drug Administration (FDA). GMA agrees with the FDA's position that it has the statutory authority and the responsibility to protect the food/feed supply, except for meat and poultry products. GMA firmly supports the position of the FDA that biotechnology is a process and, as such, does not need to be labeled.

Mandatory labeling of food products containing genetically engineered ingredients is misguided and unnecessary. The United States Food and Drug Administration (FDA) regulates the introduction and labeling of biotech foods for the entire U.S. marketplace. Producers are legally responsible to the FDA for the safety and wholesomeness of any food product placed on the market and all foods, regardless of whether they are produced using biotechnology or not, are regulated for their individual safety, toxicity and the presence of allergens. Furthermore, after decades of scientific review, the FDA determined that genetically enhanced foods are equivalent to foods developed through crossbreeding, and other traditional methods. Thus, compulsory state labeling provides no additional significant or useful information to consumers. In fact, research shows that mandatory labeling of biotechnology products has the negative impact of misleading consumers to believe foods derived from biotechnology are harmful when the best current scientific evidence indicates, they are not.

Simply put, the labeling food derived through biotechnology would lead beyond educating the consumer about food safety inevitably to the requirement of "warning labels" that focus upon the process by which a food was produced. Discussion of warning labels for these products at the state level creates a false impression that there are dangers associated with consumption of such products or that their nutritional value has somehow been diminished. If the issue is simply consumer choice, individuals who make a personal decision not to consume food containing genetically modified ingredients can already easily avoid such products. In New Hampshire and throughout the U.S. consumers can purchase products that are certified as organic under the National Organic Program. They can also buy products that companies have voluntarily labeled as not containing genetically modified ingredients. Current law already allows for voluntary labeling so long as the information is accurate, truthful and avoids misleading consumers about the food.

Finally, it is worth noting that in *INTERNATIONAL DAIRY FOODS ASSN. v. AMESTOY, 92 F.3d 67 (1996)* the court held that food manufacturers could not be compelled to label dairy products as being made with rbST. "Consumer interest alone was insufficient to justify requiring a product's manufacturers to publish the functional equivalent of a warning about a production method that has no discernable impact on a final product.

Thank you for your time and for providing this opportunity to share our thoughts on this legislation. For these reasons, The Grocery Manufacturers Association respectfully opposes the adoption of this legislation. Thank you again and if I can answer any questions, I may be reached at any time at gcosta@gmaonline.org and at 703-967-7175.