



**Connecticut Farm Bureau Association**  
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**Testimony in Opposition of: House Bill No. 6519 AN ACT CONCERNING THE LABELING OF GENETICALLY ENGINEERED FOOD.**

Submitted by: Henry N. Talmage, Executive Director, Connecticut Farm Bureau Association

*The following testimony is submitted on behalf of the Connecticut Farm Bureau, a statewide nonprofit membership organization of over 5,000 families dedicated to farming and the future of Connecticut agriculture.*

Senator Gerratana, Representative Johnson, members of the Committee,

The Connecticut Farm Bureau opposes House Bill No. 6519 because our members have adopted policy in Connecticut that states "We believe that any mandatory labeling requirements that are developed for food products should be national in scope and consistent with the science-based labeling policies of the FDA."

We are concerned that food labeling that is specific to Connecticut will put our farmers at a competitive disadvantage and may make it difficult to sell our products out of state without entirely different packaging and labeling. The bill compels farmers to label their products definitively that they were "produced with genetic engineering" even if they only MAY have been. That does not seem fair. In addition we feel that the provisions of HB 6519 would be complex and costly for many farmers to comply with and frankly unnecessary.

The Connecticut Farm Bureau is supportive of farmers choosing whatever production techniques and marketing channels they choose to promote and grow their businesses. If farmers wish to produce certified organic or certified "GMO Free" we support and encourage them to do so. In fact we recognize that doing so for some farmers might help them meet an apparent growing segment of the market. We feel that consumers seeking "GMO Free" products can today and will increasingly be able to in the future find products that meet their objectives through the existing system of certified voluntary labeling.

Our members have been engaged for years in supplying CT Grown products to our residents while continually diversifying their operations to take advantage of growing consumer demand. As a result more and more Connecticut farmers are engaged in value-added agriculture which often includes processing, packaging and selling their farm products directly to consumers. We are especially concerned about the impact this bill will have on this group of farmers. We believe that the bill has major flaws that would place undue burdens on all producers regardless of whether they produce products containing genetically engineered ingredients or not.

Section 3 of the bill outlines that any food, seed or food stock offered or intended for retail sale in this state that is, or may have been, entirely or partially genetically engineered and contained in a package shall be labeled "Produced with Genetic Engineering." The definition of "retailer" contained in the bill on line 214 "means a person or entity that engages in the sale of food to a consumer." We take that to read farmers

selling at farmer's markets or farm stands as well as restaurants that sell food in packages, grocery and convenience stores, school cafeterias and even Girl Scouts selling cookies. All must meet the mandatory labeling requirements. The bill goes on to require that any raw agricultural commodity sold in packages or in bins that is, or may have been, entirely or partially genetically engineered also be labeled "Produced with Genetic Engineering."

It seems Department of Consumer Protection will be straddled with enforcement of this bill which will require them to monitor and investigate thousands of "retail" locations to ensure compliance. The absence of the label could mean either the product was not produced with genetic engineering OR it was produced with genetic engineering and not labeled correctly. Consumers and inspectors would not be able to differentiate between the two. This is a major flaw of the bill and an area of great concern to Connecticut Farm Bureau. Consumer Protection could spend huge amounts of money to test every possible violation or they could require retailers (including farmers selling to the public) to provide proof that the unlabeled product was not produced with genetic engineering. We fear that in order to enforce the law they could require that all products be definitively labeled either "produced with genetic engineering" or "not produced with genetic engineering" so that they could then identify products with no label as clear violations. This would put the burden of labeling and proof of compliance on all farmers engaged in selling directly to consumers.

The Connecticut Farm Bureau feels this bill is both unworkable and unenforceable. We encourage you to allow the market to work with voluntary labeling and not mandate the unnecessary additional burdens on our farmers contained in HB 6519.