INFANT NUTRITION
COUNCIL OF AMERICA

TESTIMONY OF THE INFANT NUTRITION COUNCIL OF AMERICA
BEFORE THE CONNECTICUT JOINT COMMITTEE ON CHILDREN
REGARDING HB 6798 – AN ACT REQUIRING LABELING OF BABY FOOD AND INFANT FORMULA CONTAINING GENETICALLY ENGINEERED ORGANISMS

FEBRUARY 24, 2015

My name is Nick Gardner, and I am the testifying on behalf of the Infant Nutrition Council of America (INCA). The INCA is an association of manufacturers and marketers of infant formula and other formulated nutrition products, and our members produce over 95% of the infant formula purchased in the U.S.* We appreciate the opportunity to testify on House Bill 6798.

The primary focus of the INCA and its member companies is and will always remain the health and welfare of infants and young children. Infant formula is the most highly regulated food in the world and continues to be the only safe, nutritious and recommended alternative to breast milk. To that end, we respectfully oppose House Bill 6798, which would require labeling on all infant formulas containing genetically engineered organisms.

While this bill may be intended to inform consumers, requiring a label on infant formulas that contain genetically-engineered ingredients will actually confuse and mislead consumers and may jeopardize the safety of Connecticut's babies. The proposed labels are unnecessary, provide no public health benefit and may create alarm among caregivers, potentially leading to the use of unsafe infant feeding methods, like homemade formula, that are not recommended by any medical authority and extremely dangerous to infant health.

As is the case with many other foods, some infant formula ingredients can be derived from widely cultivated genetically-engineered crops. An extensive body of rigorous national and international scientific evidence supports the safety of these ingredients for use in foods consumed by adults as well as infants and young children. The U.S. Food and Drug Administration (FDA) has concluded that all genetically-engineered ingredients that are currently permitted for use in foods, including infant formulas, are safe and the same in composition, nutritional value and quality as ingredients not derived through biotechnology. FDA has thus determined that the labeling of foods containing genetically-engineered ingredients is unnecessary, a position supported by numerous regulatory agencies and health organizations, including the American Medical Association.

Consumer interest for information about genetically engineered ingredients is best addressed through voluntary labeling. FDA has issued clear and logical guidance on the use of label statements on foods that have not been developed through genetic engineering. Because federal law requires that labeling must be truthful and not misleading, a manufacturer who claims that a product has not been produced using genetic engineering must be able to substantiate the claim. FDA does require special labeling when the absence of "material" information on a label may pose a special health or environmental risk, or would mislead consumers based on other statements on the label. As the use of biotech ingredients is not "material" to the safety of a food, these requirements do not apply when genetically engineered ingredients are used. On the contrary, misunderstandings, misinformation and unfounded fears of biotechnology, combined with the proposed special labels on infant formula, actually have the potential to mislead consumers and cause harm to infants.

HB 6798 is unnecessary and inappropriate given the law that was already passed in Connecticut. A comprehensive review of the available scientific research on biotech foods indicates no risk to any age group, including infants, from the consumption of biotech foods and ingredients. That means there is no

* INCA members are Abbott Nutrition, Mead Johnson Nutrition, Nestlé Infant Nutrition and Perrigo Nutritionals.

compelling health, safety or nutritional rationale that supports the notion of labels to disclose the presence of genetically engineered ingredients only in foods for infants and young children.

HB 6798 may drive some caregivers to use alternative infant feeding options, such as homemade infant formula, which are not recommended by medical authorities and may be extremely dangerous to infant health. Examples of the use and recommendations to use homemade formula as a means to avoid infant formulas containing biotech ingredients, including numerous online recipes, are evident on social media and other online d boards, and widely available to Connecticut consumers. These recipes have been evaluated and found to be deficient in key nutrients required by federal authorities. They also recommend the use of ingredients and processes that could introduce dangerous pathogens, while lacking the safe handling and preparation instructions or guidance on the safe storage of the formula. The American Academy of Pediatrics, FDA and other health organizations unanimously and strongly recommend against the use of homemade infant formula. The use of homemade infant formula is dangerous to the health of infants, and is a legitimate unintended consequence of this legislation.

In summary, mandatory labeling on infant formula products containing genetically-engineered ingredients is unnecessary, does not provide any benefit to the health or welfare of consumers, and may result in a number of unintended consequences that threaten infant health. The legality of mandatory labeling requirements of genetically engineered foods is also questionable, as evidenced by the pending litigation in Vermont, and should give this body pause when considering additional biotech labeling legislation. Further, organic certifications provide consumers with the option to avoid genetically engineered if desired. For these reasons, INCA strongly opposes House Bill 6798.

Key Excerpt from United States House of Representatives
Committee on Energy and Commerce Subcommittee on Health
"EXAMINING FDA'S ROLE IN THE REGULATION OF GENETICALLY MODIFIED FOOD INGREDIENTS"

December 10, 2014

Lines 458-471

Mr. {Landa.} *Good morning, Chairman Pitts, Ranking Member Pallone, and members of the subcommittee. I am Michael M. Landa, Director of the Center for Food Safety and Applied Nutrition at the Food and Drug Administration. Thank you for the opportunity to be here today to discuss FDA's regulatory program for genetically engineered, or GE, foods.*

Over the last 20 years, FDA has reviewed data and information on more than 150 plant-derived GE foods. These range from herbicide-tolerant soybeans to canola oil with a modified fatty acid profile. Based on our evaluations, we are confident that the GE foods in the U.S. marketplace today are as safe as their conventionally-bred counterparts. The section and genetic improvement of plants for agricultural use has been going on for thousands of years.

Lines 3229-3244

Earlier today, we had FDA a witness testify, a very senior FDA official testify [Mr. Mike Landa]. *He said that GE foods in the U.S. marketplace today are safe as their conventional 3232 counterparts. We will start on my left, your right, and tell me if you agree, yes or no, with that statement.*

Ms. {Van Eenennaam.} *Yes.*
Mr. {Faber.} *I believe so.*
Mr. {Pompeo.} *That is a yes, for the record.*
Ms. {Webb.} *Yes.*
Mr. {Pompeo.} *Just yes, yeah.*
Ms. {Forshee.} *Yes.*
Mr. {Dempsey.} *Yes.*

Mr. {Pompeo.} *Yes. We have total unanimity. That is fantastic. That is one of the first times in this committee we have had that in my 4 years here, so that is all good news.*

DEPARTMENT OF HEALTH AND HUMAN SERVICES | Public Health Service

Food and Drug Administration
Silver Spring, MD 20993

STATEMENT OF

MICHAEL M. LANDA, J.D.

DIRECTOR

CENTER FOR FOOD SAFETY AND APPLIED NUTRITION

FOOD AND DRUG ADMINISTRATION

DEPARTMENT OF HEALTH AND HUMAN SERVICES

BEFORE THE

SUBCOMMITTEE ON HEALTH

COMMITTEE ON ENERGY AND COMMERCE

U.S. HOUSE OF REPRESENTATIVES

December 10, 2014

FOR RELEASE ONLY UPON DELIVERY

Good morning, Chairman Pitts, Ranking Member Pallone, and Members of the Subcommittee. I am Michael M. Landa, Director of the Center for Food Safety and Applied Nutrition at the Food and Drug Administration (FDA or the Agency), which is part of the Department of Health and Human Services (HHS). Thank you for the opportunity to be here today to discuss FDA's regulatory program for genetically engineered (GE) food.[1]

Over the last 20 years, FDA has reviewed and evaluated data and information on more than 150 GE plant-derived foods, ranging from herbicide-tolerant soybeans to canola oil with a modified fatty acid profile. In a 1992 policy statement on foods derived from new plant varieties (including GE plant varieties), FDA stated that the Agency was not aware of any information showing that foods derived by these methods (i.e., genetic engineering) differ from other foods in any meaningful or uniform way or that, as a class, foods developed by the new techniques present any different or greater safety concern than foods developed by traditional plant breeding. This 1992 statement and its scientific underpinnings still reflect FDA's current thinking about foods derived from GE plants and, based on our evaluations, we are confident that the GE foods in the U.S. marketplace today are as safe as their conventional counterparts.

BACKGROUND

The selection and genetic improvement of plants for agricultural use has been going on for thousands of years, although plant breeding as a science only began in the late 1800s. Typically,

[1] Genetically engineered foods are also referred to as biotech, bioengineered, and genetically modified (GM) foods. Because from a scientific perspective, the term "genetic modification" means the alteration of the genotype of an organism using any technique, new or traditional, and therefore also encompasses plants altered through methods such as conventional breeding and selection, FDA uses the term "genetically engineered," or "GE," to distinguish organisms that have been modified using genetic engineering (also known as modern biotechnology) from those modified through traditional breeding.

plant breeding has involved crossbreeding and hybridization, in which two related plants are cross-fertilized, and the resulting offspring have characteristics of both parent plants. In the breeding process, however, many undesirable traits often can appear in addition to the desirable ones. Some of those undesirable traits can be eliminated through additional breeding, which is time-consuming. Breeders can then further select and reproduce the offspring that have the desired traits. Many of the foods that are already common in our diet are obtained from plant varieties that were developed using conventional genetic techniques of breeding and selection. Hybrid corn, nectarines (which could be considered genetically altered peaches), and tangelos (a genetic hybrid of a tangerine and grapefruit) are all examples of such breeding and selection.

Today, by inserting one or more specific genes into a plant, scientists are able to produce a plant with new characteristics. These techniques give scientists the ability to isolate specific genes of interest and introduce them and their corresponding traits into plants without simultaneously introducing undesirable genes and traits. This is an improvement over traditional plant breeding because it can reduce the time-consuming process of breeding out undesired genes and traits when developing a new variety. Genetic engineering also expands the range of new proteins and other substances that can be introduced into plants.

Any genetic modification technique, including both traditional methods and genetic engineering, could change the composition of a food in a manner relevant to food safety. However, FDA has well-established scientific procedures for evaluating the safety of such new substances, and our guidelines help developers identify these issues and address such concerns prior to marketing. It is important to note that the kinds of testing typically conducted by developers of a GE food

crop to ensure that their foods meet applicable requirements of the Federal Food, Drug, and Cosmetic Act (FD&C Act) also address food safety concerns. In the event that something unexpected does occur, this testing provides a way to detect such changes at the developmental stage and defer marketing until any concerns are resolved. FDA expects developers of GE foods to analyze the composition of the foods from their new crop varieties to ensure that any changes compared to the food's conventionally derived counterpart are appropriately considered and addressed before marketing such foods.

As part of our review and analysis, we consider whether any newly introduced protein is likely to be allergenic or toxic and whether levels of important nutrients or anti-nutrients have been changed in a way that is important to food safety or nutrition. We also consider whether any newly introduced protein requires premarket approval as a food additive. Later in my testimony, I will describe the Agency's rigorous premarket consultation process and discuss in more detail how it helps us ensure the safety of foods derived from GE plants.

LEGAL AND REGULATORY FRAMEWORK

FDA regulates the safety of foods, including foods derived from GE plants, under the FD&C Act and other applicable laws and regulations. Under the FD&C Act, FDA is also responsible for enforcement with respect to unlawful pesticide chemical residues in foods. Foods, such as fruits, vegetables, grains, and their byproducts, derived from plant varieties developed through genetic engineering, are subject to the same safety and labeling requirements as foods derived from non-GE plants. The Agency has broad authority to initiate regulatory action if a product fails to meet the requirements of the FD&C Act, as discussed in more detail below.

FDA regulates foods from GE crops in conjunction with the U.S. Department of Agriculture (USDA) and the Environmental Protection Agency (EPA) under the Coordinated Framework for the Regulation of Biotechnology, adopted by the agencies in 1986.[2] Pesticides, including those genetically engineered into food crops, are regulated by EPA, which reviews the safety of pesticides and sets tolerances for pesticides (or establishes exemptions from the requirement of a tolerance). USDA's Animal and Plant Health Inspection Service oversees the agricultural, plant health, and environmental safety of planting and field testing of GE plants.

FDA relies primarily on two sections of the FD&C Act to ensure the safety of foods and food ingredients, including those that are produced using genetic engineering:

The adulteration provisions of section 402(a)(1) [21 U.S.C. 342(a)(1)]. Under this post-market authority, FDA has the power to remove a food from the market (or sanction those marketing the food) if the food poses a risk to public health. It is important to note that the FD&C Act places a legal duty on developers, manufacturers, and distributors to ensure that the foods they market to consumers are safe and comply with all legal requirements.

The food additive provisions of section 409 [21 U.S.C. 348]. Under this section, a substance that is intentionally added to food is a food additive, unless the substance is generally recognized as safe (GRAS) or is otherwise excluded (e.g., a pesticide, the safety of which is overseen by EPA). The FD&C Act requires premarket approval of any food additive, regardless of the

[2] 51 FR 23302, June 26, 1986

technique used to add it to food. Use of an unapproved food additive renders the food unsafe and subject to the adulteration provisions in 402(a)(2)(C) of the FD&C Act.

FDA's *Statement of Policy: Foods Derived from New Plant Varieties*[3] explains how existing legal requirements apply to plant-derived food products developed using the tools of biotechnology. The policy was designed to answer questions about these products and to assist developers, prior to marketing, to meet their legal duty to provide safe and wholesome foods to consumers. The basic principle of the policy is that the traits and characteristics of the foods should be the focus of safety assessment for all new varieties of food crops, no matter which techniques are used to develop them.

Under FDA policy, a substance that would be a food additive if it were added during traditional food manufacturing is also treated as a food additive if it is introduced into food through genetic engineering of a food crop. Section 409 requires premarket approval of any food additive and, thus, requires premarket approval of any substance intentionally introduced via genetic engineering that is not GRAS.

Examples of substances intentionally introduced into food that would not be considered GRAS and, therefore, would be reviewed as food additives include those that have unusual chemical functions, have unknown toxicity, or would be new major dietary components of the food. In general, substances intentionally added to or modified in food via genetic engineering to date have been proteins and fats that are, with respect to safety, similar to other proteins and fats that

[3] 57 FR 22984, May 29, 1992, accessible at *http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Biotechnology/ucm096095.htm*

are commonly and safely consumed in the diet. Therefore, these substances have not been subject to the food additive approval process. In our experience with GE foods to date, we have approved only one substance as a food additive for human consumption—an enzyme produced by an antibiotic resistance gene (kanamycin). We are currently reviewing several substances under the food additive approval process for use in animal food.

VOLUNTARY PREMARKET CONSULTATION PROCESS

Food growers, manufacturers, and distributors are responsible for taking the steps necessary to ensure that their food products marketed in the United States are safe. To help developers of food derived from GE plants comply with their obligations under the FD&C Act and FDA regulations, the Agency encourages them to participate in a voluntary consultation process with FDA prior to commercial distribution. The goal of the voluntary premarket consultation process is to ensure that any safety or other regulatory issues associated with food from the new plant variety are resolved *prior* to commercial distribution. Although the premarket consultation is voluntary, in our experience, most developers utilize this pathway. FDA also retains the authority to regulate and ensure the safety of foods derived from new plant varieties under existing adulteration and misbranding provisions of the FD&C Act.

The results of FDA's consultations are public information and are available on the Agency's website. Since the consultation process was created, developers of GE plants (which include private companies, academic institutions, and government agencies) have completed the process more than 100 times as they sought to introduce plants representing more than 150 different crop varieties into the U.S. market. These evaluations have included varieties of soybean, corn,

cotton, canola, papaya, alfalfa, creeping bent grass, plum, potato, sugar beet, wheat, rice, cantaloupe, flax, squash, and radicchio with traits such as herbicide tolerance, insect resistance, virus resistance, altered ripening, altered nutritional profiles, altered plant fertility, and altered plant growth properties. Where the traits are pesticidal, FDA directs developers to work with EPA, which evaluates the safety of pesticides under section 408 of the FD&C Act.

Typically, the consultation begins early in the product development stage, well before it is ready for market. Developers meet with FDA scientists to describe the product they are developing. In response, the Agency advises the company on what tests would be appropriate for the developer to assess the safety of the new food.

After the studies are completed, a summary of the data and information on the safety and nutritional assessment are provided to FDA for review. The Agency evaluates the information for all relevant food safety hazards, including potential unintended effects on plant composition and nutritional properties, since plants may undergo changes other than those intended by the developers. For example, FDA scientists evaluate data and information to assure that the newly expressed compounds are safe for food consumption and that there are no allergens new to the food, no increased levels of natural toxicants or anti-nutrients, and no reduction of important nutrients.

The safety assessment approach FDA applies during its evaluation of consultation submissions is consistent with the approach laid out in the Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants (CAC/GL 45-2003), established

by the Codex Alimentarius Commission, a food standard-setting body established by the Food and Agriculture Organization of the United Nations (FAO) and the World Health Organization (WHO).

Some examples of the information evaluated by FDA include:

- The name of the food and the crop from which it is derived;
- The uses of the food, including both human food and animal feed uses;
- The sources, identities, and functions of introduced genetic material and its stability in the plant;
- The purpose or intended technical effect of the modification and its expected effect on the composition and characteristic properties of the food or feed;
- The identity and function of any new substances introduced by the genetic material, including an estimate of its concentration;
- A comparison of the composition and/or characteristics of the GE food to that of food derived from the parental variety or other commonly consumed varieties with special emphasis on important nutrients, anti-nutrients, and toxicants that occur naturally in the food;
- Information on whether the genetic modification altered the potential for the GE food to induce an allergic response; and
- Other information relevant to the safety and nutritional assessment of the GE food.

These examples are not meant to be exhaustive, but are sufficiently broad so as to provide FDA with an indication of any safety or other regulatory issues that may require additional

investigation. This flexibility allows FDA's consultation program to ask the necessary questions to understand any uncertainties that may exist concerning safety or other attributes of the food in order to ensure the safety and lawfulness of food from a new plant variety.

If FDA scientists have questions about the safety data, the developer may, for example, provide more detailed answers or conduct additional studies. The fact that participation in the process is voluntary should not mislead individuals to believe that the process does not provide for a rigorous food safety evaluation. It is not uncommon for FDA to request additional data and information or clarification about the data and information submitted by the developer. This iterative process makes for a rigorous safety evaluation. FDA considers a consultation to be complete only after all safety and other legal issues have been resolved. The premarket consultation process is working well and protects public health by helping FDA ensure that firms are making market-entry decisions in compliance with the law.

LABELING OF GE FOODS

FDA also regulates the labeling of food under the FD&C Act. Section 403 of the Act [21 U.S.C. 343] sets labeling requirements for foods subject to the FD&C Act. In general, all foods, whether derived from genetic engineering or not, are subject to these labeling requirements. Section 403(a)(1) establishes that a food is misbranded if its labeling is false or misleading in any particular. Section 201(n) provides, in relevant part, that labeling is misleading if, among other things, it fails to reveal facts that are material in light of representations made or suggested in the labeling, or material with respect to consequences that may result from the use of the food

under the conditions of use prescribed in the labeling, or under such conditions of use as are customary or usual.

In its 1992 Policy Statement, FDA explained that it found no basis to conclude that foods derived from new plant varieties using genetic engineering techniques, as a class, differ from other foods in any meaningful or uniform way or pose any different or greater safety concern than foods developed by traditional plant breeding. Therefore, the use of genetic engineering in the development of a food is normally not, by itself, material information within the meaning of section 201(n) of the FD&C Act. Scientific studies, information, and data FDA has reviewed since then, including data and information evaluated through the voluntary premarket biotechnology consultation process, reflects the same conclusion.

Federal courts have held that, absent a material fact or difference in a food derived from a GE source, sections 403(a)(1) and 201(n) of the FD&C Act do not require labeling indicating that the food has been developed through genetic engineering. Further, courts have held that consumer desire to know such information is not, by itself, sufficient to require such labeling. FDA may require special labeling for a GE food, just as we would for a non-GE food that has been genetically modified through traditional methods, when the genetic change results in a material difference in the food, such as a difference in nutritional content of the food (e.g., altered fatty acid profile) or a difference in functional characteristics of the food (e.g., suitability for frying). We note that the Agency has received two Citizen Petitions regarding the labeling of genetically engineered foods. We are currently reviewing those petitions and considering the issues presented.

We recognize and appreciate that many consumers are interested in knowing whether their food is produced using genetic engineering. Currently, food manufacturers may indicate through voluntary labeling whether foods have or have not been developed through genetic engineering, provided that such labeling is truthful and not misleading. The Agency is supportive of such voluntary labeling and, in 2001, issued draft guidance to industry to help food manufacturers who wish to voluntarily provide such information in food labeling to help ensure that such labeling is truthful and not misleading. FDA received more than 155,000 comments on the draft guidance. The Agency has considered the comments we received and is currently revising the draft guidance with the goal of publishing a final guidance document to assist food manufacturers who want to provide such labeling statements.

GE ANIMALS

FDA regulates GE animals under the new animal drug provisions of the FD&C Act and the Agency's implementing regulations. When the genetic material, or recombinant DNA (rDNA) construct, used to engineer the animal is intended to affect the structure or function of that animal, the rDNA construct meets the definition of a drug in the FD&C Act. The new animal drug approval process provides a rigorous review for such products.

The FD&C Act generally requires sponsors to demonstrate the safety and effectiveness of a new animal drug for the proposed conditions of its use prior to marketing. For new animal drugs that are intended for use in food-producing animals, FDA's evaluation of safety includes not only an evaluation of target animal safety, but also an evaluation of food safety. In addition, FDA is

required to comply with the National Environmental Policy Act prior to taking any major actions, such as approval of an application.

In January 2009, FDA issued a final guidance for industry on the regulation of GE animals. The guidance explains the process by which FDA is regulating GE animals and provides a set of recommendations to producers of GE animals to help them meet their obligations and responsibilities under the law.

As the company has publicly noted, FDA is currently reviewing a new animal drug application related to AquAdvantage Salmon, an Atlantic salmon developed by AquaBounty Technologies, Inc. which is genetically engineered to grow more quickly than its conventional counterpart. In December 2012, the Agency made its draft environmental assessment (EA) and a preliminary finding of no significant impact (FONSI) available for public comment. The draft EA and preliminary FONSI are the Agency's initial assessment of the potential impacts of the proposed product on the environment of the United States under the specific conditions of use proposed by the sponsor, and they are one part of the evaluation of the new animal drug application. FDA received over 35,000 comments on the draft EA and preliminary FONSI. We are reviewing these comments in order to determine whether any changes in the draft EA are warranted or if there is any new information that would cause the Agency to change its preliminary findings related to the environmental assessment.

On September 19-20, 2010, the Agency held a public meeting of its Veterinary Medicine Advisory Committee (VMAC), a body comprised of independent outside experts who advised

FDA on scientific, technical, and policy matters, to discuss AquAdvantage Salmon. The presentations made by Agency experts, the transcript of that meeting, the Chair's report, and VMAC documents containing detailed information on the review process are all posted on FDA's website for public review. At the public meeting, the Agency did not indicate any preliminary views or determination on the product application. It did, on the safety question, provide a preliminary indication noting that based on the data and information available at that time, food from AquAdvantage Salmon appears to be as safe to eat as farmed, conventionally bred Atlantic salmon. FDA will make a final food safety determination before reaching any final decision on whether to approve the new animal drug application for AquAdvantage Salmon. We also note that at that time, the Agency will provide information to the public regarding any labeling of AquAdvantage Salmon, in the event that the new animal drug application for this product is approved.

CONCLUSION

FDA's consultation process for foods derived from GE plants provides for a rigorous food safety evaluation of GE foods. As a result of these premarket consultations, we are confident that GE foods in the U.S. marketplace today are as safe as their conventional counterparts. The Agency, in cooperation with EPA and USDA, will continue its oversight of new and emerging GE food products and will be vigilant in ensuring the safety and integrity of the food supply.

Thank you for the opportunity to discuss FDA's regulation of GE foods. I am happy to answer any questions you may have.

This is a preliminary transcript of a Committee hearing. It has not yet been subject to a review process to ensure that the statements within are appropriately attributed to the witness or member of Congress who made them, to determine whether there are any inconsistencies between the statement within and what was actually said at the proceeding, or to make any other corrections to ensure the accuracy of the record.

{York Stenographic Services, Inc.}

RPTS EDWARDS

HIF344.140

EXAMINING FDA'S ROLE IN THE REGULATION OF GENETICALLY MODIFIED FOOD INGREDIENTS

WEDNESDAY, DECEMBER 10, 2014

House of Representatives,

Subcommittee on Health

Committee on Energy and Commerce

Washington, D.C.

The subcommittee met, pursuant to call, at 10:16 a.m., in Room 2123 of the Rayburn House Office Building, Hon. Joe Pitts [Chairman of the Subcommittee] presiding.

Members present: Representatives Pitts, Burgess, Shimkus, Murphy, Blackburn, Lance, Guthrie, Griffith, Bilirakis, Ellmers, Pallone, Engel, Capps, Schakowsky, Matheson, Green, Butterfield, Barrow, Castor, Sarbanes, and Waxman (ex officio).

Also present: Representative Pompeo.

Staff present: Nick Abraham, Legislative Clerk; Clay Alspach, Chief Counsel, Health; Gary Andres, Staff Director; Leighton Brown, Press Analyst; Karen Christian, Chief Counsel, Oversight; Noelle Clemente, Press Secretary; Brad Grantz, Policy Coordinator, Oversight and Investigations; Sydne Harwick, Legislative Clerk; Brittany Havens, Legislative Clerk; Peter Kielty, Deputy General Counsel; Carly McWilliams, Professional Staff Member, Health; Tim Pataki, Professional Staff Member; Chris Sarley, Policy Coordinator, Environment and Economy; Macey Sevcik, Press Assistant; Adrianna Simonelli, Clerk; Heidi Stirrup, Health Policy Coordinator; John Stone, Counsel, Health; Tom Wilbur, Digital Media Advisor; Ziky Ababiya, Democratic Staff Assistant; Eric Flamm, Democratic FDA Detailee; Debbie Letter, Democratic Staff Assistant; Karen Lightfoot, Democratic Communications Director and Senior Policy Advisor; Karen Nelson, Democratic Deputy Committee Staff Director for Health; and Rachel Sher, Democratic Senior Counsel.

Mr. {Pitts.} The subcommittee will come to order. Before we begin, I would like to take a moment to address the guests in our audience. First of all, thank you all for coming. We think engaged citizens are a welcome and valuable part of the political process, and I only wish every hearing drew this much interest.

The purpose of this hearing is to examine FDA's role in regulating genetically-modified food ingredients, and it is an opportunity for this committee to ask questions and have a thoughtful discussion on this issue. The number of people in this audience and in the hallway this morning demonstrates the strong interest in this topic, and we welcome that interest and your attendance here today. I do want to remind our guests that the chair is obligated, under the rules of the House and rules of the committee, to maintain order, preserve decorum in the committee room, and I know that we all may not agree on this topic, but I ask that we all abide by these rules and be respectful of our audience members, our viewers and our witnesses, and the chair appreciates the audience's cooperation in maintaining order as we have a full discussion on this important issue this morning.

The chair will now recognize himself for an opening statement.

The genetically-modified organisms, or GMOs, is a term that refers to ingredients sourced from crops that have been genetically engineered to express certain traits or characteristics. A number of people have an instinctive distrust of food that has been genetically modified, and are asking questions about its safety. Others see great promise for better nutrition and the alleviation of hunger around the world.

There are real sensitivities around this issue, and all issues regarding the food we eat and feed our children and our grandchildren. It is our job as policymakers, particularly as it relates to the public health, to establish a factually and scientifically sound foundation prior to taking any action that would impact consumers and our economy, and this hearing provides a great opportunity to put rhetoric aside and do just that.

GMOs have been a part of the U.S. food supply since the mid-1990s. In fact, as much as 90 percent of our corn, sugar beet, and soybean crops are now genetically engineered, and about 70 percent of processed foods contain such ingredients. The U.S. Food and Drug Administration oversees the safety and the labeling of all food products from plant sources, including those from genetically-engineered crops. These products must meet the same safety requirements as foods from

traditionally bred crops. The Food and Drug Administration currently has a consultation process in place in which developers of the underlying technologies address any outstanding safety or other regulatory issues with the agency prior to marketing their products. FDA has completed approximately 100 of such consultations. No products have gone to market until FDA's safety-related questions have been resolved.

According to FDA Commissioner Margaret Hamburg, FDA has ``not seen evidence of safety risks associated with genetically-modified foods.'' Further, FDA has no basis for concluding that bioengineered foods are different from other foods in any meaningful way, and the World Health Organization has stated that ``no effects on human health have been shown as a result of consumption of such foods.'' In fact, they can grow faster, resist diseases and drought, lower reliance on pesticides, cost less and prove more nutritious. Even President Obama has stated that ``advances in the genetic engineering of plants have provided enormous benefits to American farmers'' and that ``investment in enhanced biotechnology is an essential component of the solution to some of our planet's most pressing agricultural problems.''

Nonetheless, there have recently been a number of state

initiatives calling for the mandatory labeling of food products that contain GMOs, and we will hear today from a number of witnesses who can speak to such actions and the impact they would have.

Food labeling is a matter of interstate commerce and is, therefore, clearly a federal issue that rightfully resides with Congress and the FDA. I am concerned that a patchwork of 50 separate state labeling schemes would be impractical and unworkable. Such a system would create confusion among consumers and result in higher prices and fewer options.

Finally, I want to commend Representative Mike Pompeo and Representative Butterfield for their leadership on these issues, and I look forward to learning more about H.R. 4432, the Safe and Accurate Food Labeling Act of 2014, and I would seek unanimous consent of the committee that Mr. Pompeo, who is on the full committee but not on the Health Subcommittee, be able to sit with us today in this hearing.

Without objection, so ordered.

I would like to welcome all of our witnesses for being here today. I look forward to your testimony.

[The prepared statement of Mr. Pitts follows:]

********** COMMITTEE INSERT **********

Mr. {Pitts.} And at this time, I yield 5 minutes to the ranking member for his opening statement.

Mr. {Pallone.} Thank you, Chairman Pitts.

Today's topic one is the thoughtful consideration of this committee. Many Americans are interested in the regulation and labeling of foods with genetically-modified ingredients, and while it is an emotional issue for many, the facts can lead reasonable people to different conclusions.

For policymakers, there are a number of considerations involved, so I am glad that we are able to convene a panel to share the range of perspectives on the issues, and I hope we can engage in an honest and respectful discussion.

Genetically-modified foods have been in our food supply for decades. In fact, some estimate that over 70 percent of processed foods contain GMOs, however, they are not labeled as such. In the wake of growing concerns from consumers, the Food and Drug Administration issued a policy statement on its regulatory oversight and labeling policies for GM foods in 1992, and in 2001, issued draft guidance on voluntary industry labeling.

I fully understand why consumers want to know what goes on into the--what goes into the food they serve their families. For people to make informed decisions about what

they eat, they need information, and that is why we required food labels to include nutrition facts, and that is why they must use common rather than technical names for ingredients whenever possible so that this information is, in fact, useful. It is also why several states have enacted their own regulations mandating the labeling of these foods. Three states have put new laws on their books, while many more have considered doing so, either through ballot initiative or state legislation. None of the state labeling laws have gone into effect yet.

While such laws give voice to the many who are concerned, I am troubled by the net effect of the inconsistent state standards. America's agricultural production and food distribution chains necessarily cross state lines, and conflicting regulations could cause difficulties, resulting in higher cost for consumers.

Like the advances in medical technology that we deal with as a subcommittee, innovations in biotechnology have a real potential to address current problems and improve the quality of life for people across the globe. And as representatives of the American people, we must also be sure that the application of these technologies does not put consumers at risk, and that information is available to those seeking it out. In the end, the science must remain the

arbiter of any safety concerns, and our regulations must reflect a rigorous evaluation of the evidence.

So again, I am glad that we are having this hearing. I look forward to the panel's testimony. I hope that we can weigh the merits of all recommendations presented, and evaluate just how any regulatory approach would best serve the interests of the American people.

[The prepared statement of Mr. Pallone follows:]

********** COMMITTEE INSERT **********

Mr. {Pallone.} I would like to yield the remainder of my time to the gentleman from North Carolina, Mr. Butterfield.

Mr. {Butterfield.} Thank you, Mr. Pallone, for yielding. Thank you, Mr. Chairman, for your kind words, and thank all of you for coming today.

Mr. Chairman, access to safe and affordable food is very important to every consumer in America. I think at least we can agree on that fact. I begin this conversation by saying that I represent an agricultural district in North Carolina. It is also a low-income district, and so I have a very keen interest in this subject. A large portion of my North Carolina district is agriculture. Farmers all across my state and across my district remind me that North Carolina farmers don't just grow crops for North Carolinians, they grow crops for America. And so the food supply chain is vast. It is interconnected. The work necessary to get an apple or an ear of corn to the produce section at the supermarket is absolutely staggering. From sea, to farmer, to wholesaler, to processor, to packer, to distributor, even to the store shelf itself, it is easy to appreciate the intricate system that feeds America, and I am beginning to learn more and more about this.

But several states have proposed regulations, and that I worry, if enacted, would cause significant disruption to the Nation's food supply. It would cause confusion, it would cause uncertainty among consumers, and ultimately will result in increased costs at the checkout line. Depending on what state regulations mandate, separate supply chains will likely have to be developed, beginning at the farm, and at every state--step, all the way to the supermarket.

The new infrastructure requirements are as daunting as they are costly, and you can bet that all of those costs will be passed on to the consumer, with studies showing that the average cost topping $500 a year. For many of my constituents, that would be impossible.

So I have worked with my friend, Mr. Pompeo, and others to propose what I believe is a measured approach that gives consumers certainly while--certainty while taking into account the delicate balance and sheer size and complexity of the food supply chain that employs many Americans.

The proposal, my friends, is very simple. The FDA, our Nation's foremost food safety authority, should have the authority to require labeling on genetically-modified foods, and establish federal standards so that consumers, regardless of where they live or work, will clearly understand the options.

Finally, I would say, Mr. Chairman, that I will be the first to say that this proposal is not perfect. This proposal is not perfect. It will certainly evolve as it progresses. We don't legislate in a vacuum, but I believe a national, a national labeling standard makes the most sense for our highly-integrated and interdependent food supply. I am confident that we will take what we learn from today's hearing, as well as the input we are sure to receive, to inform out work as we move forward. We need commonsense legislation.

[The prepared statement of Mr. Butterfield follows:]

********** COMMITTEE INSERT **********

Mr. {Butterfield.} Thank you very much. I yield back.

Mr. {Pitts.} Gentleman's time has expired.

The chair now recognizes the vice chairman of the full committee, the gentlelady from Tennessee, Mrs. Blackburn, for 5 minutes for an opening statement.

Mrs. {Blackburn.} Thank you, Mr. Chairman.

The people who are going to be harmed the most by the anti-GMO activist movement are those who can least fight against it. For example, there is a rice, it is called golden rice, which was developed with genetic engineering. One of the benefits to this rice, and the reason that it is called golden rice, is that it has a level of vitamin A that is not found in other rice. Golden rice has fed millions of starving people around the world, and additionally, prevented blindness and death because of the presence of vitamin A. The rice has been shown to be safe by multiple tests, and yet the anti-GMO activists have opposed its use simply because they do not like the idea of genetically-modified food.

Farmers have genetically-modified food for centuries. Farmers would breed cattle to get the best traits. Crops were developed which are most resistant to drought, pests and weeds. George Washington Carver did research and taught at Tuskegee for over 40 years. While there, he developed

techniques to improve soil, give farmers alternative cash crops, improve the nutrition of people living in the south. He did this by experimenting with different varieties of peanuts and sweet potatoes. Of course, different varieties are simply products with different genetic makeup.

To bring reason to this discussion of different varieties of food, my colleagues and I have introduced legislation, H.R. 4432, the Safe and Accurate Food Labeling Act of 2014, introduced by Representative Pompeo and myself, along with Representatives Matheson and Whitfield, would prohibit genetically-modified plants intended for food use to be sold without first complying with a safety review process at the FDA. Under this Bill, if the FDA were to find a difference between the new product and a comparable non-GMO food that might affect safety, the FDA would require a label. The bill would do the following. Number one, advance food safety. Address the questions that consumers have about the safety of GMO food by requiring the FDA to conduct a safety review of all new GMO traits before they are introduced to the marketplace. Number two, inform consumers. Help consumers make sense of GMO labeling claims and their choices in the marketplace by asking the FDA to establish federal standards for companies that want to voluntarily label their product for the absence of or the presence of GMO food

ingredients. Number three, provide consistency. Improve food labels using the term natural by requiring the FDA to define the term for its use on food and beverage products, thus creating a consistent legal framework to guide food labels and inform consumer choice. Fourth, eliminate confusion, which is what all good legislation should do, and remove the uncertainty of the 50 state patchwork.

[The prepared statement of Mrs. Blackburn follows:]

********** COMMITTEE INSERT **********

Mrs. {Blackburn.} Thank you for holding the hearing, and at this time, I yield my remaining time to Mr. Pompeo.

Mr. {Pompeo.} Thank you for yielding, Mrs. Blackburn. Thank you to you and to Mr. Butterfield for being cosponsors of this Bill. You can see today that we are engaged in a bipartisan effort to get to the facts and the science surrounding this incredibly important issue. I want to thank all the witnesses for coming. I especially want to thank Stacey Forshee, fellow Kansan. It is her second trip to Washington to help do good work on behalf of consumers all across the country. Thank you for being here today.

Look, at the end of the day, this is a Bill that is needed to make sure that folks all across American can afford food. We in America have known for a long time that absent innovation and technology, the food prices will rise dramatically. We won't be able to feed the next billion people in the world either, something that I think we take great pride in here in America. Studies have shown that absent this legislation, the average family's food bill will go up by $500, and while I know there are some--for some for whom that is not a lot of money, there are a lot of folks that I represent for whom that it is an awful lot of money, and who are living day-to-day and paycheck to paycheck, and

who care deeply to make sure that their food prices, one of the things that they have to make hard decisions about from time to time, doesn't get even more difficult in this economy that we know is all--is struggling so much. And it is also to help folks who are the producers of this food, to make sure that they have a way to get this product from their cattle ranch or their farm, or wherever it may be, to our store shelves in a way that they can do profitably, so that they can continue to invest in their products, so that America continues to be the leader in world production of food in an affordable way.

You know, the science is not debatable here. There has been lots of research, lots of studies. Even those who oppose this bill don't make much of a case about the science. And that is what FDA is all about; it is about getting the science right. This bill gives them the opportunity to continue to review that, and I think it is really good policy and will make our food supply chain enviable all around the world.

[The prepared statement of Mr. Pompeo follows:]

********** COMMITTEE INSERT **********

Mr. {Pompeo.} I yield back.

Mr. {Pitts.} The chair thanks the gentleman.

Now recognize the ranking member of the full committee, Mr. Waxman, 5 minutes for an opening statement.

Mr. {Waxman.} Thank you very much, Mr. Chairman.

Today's hearing is on a topic about which many Americans have strong feelings. Twenty years ago, the first genetically-engineered food, the slow-ripening, Flavr Savr tomato, went on the market. Today, the vast majority of corn and soybeans and cotton and canola and sugar beets and papaya grown in the U.S. are genetically engineered. All of these foods have been assessed by the Food and Drug Administration in a voluntary consultation process, and FDA has found no significant differences between them and their traditionally-bred counterparts.

Some 70 to 80 percent of packaged foods contain ingredients from genetically engineered, or GE, plants. Yet, despite their ubiquity and FDA's okay, many consumers remain uncomfortable with these foods and want mandatory labeling so they can avoid them.

As we consider the questions on GE foods at today's hearing, I will examine them in the context of some important principles I have long supported. First, I believe it is

369 critical that our actions be based on science. As with so
370 many other matters pertaining to products we use and consume
371 every day, we need to rely on the expertise of FDA and other
372 scientific regulatory agencies. Second, when we consider
373 requiring labeling on food, that label should provide useful,
374 science-based information to consumers. I certainly believe
375 that food labels should enable consumers to make informed
376 choices. I fought hard to pass legislation that gave
377 consumers useful information about the nutritional content of
378 food. Third, unless there is a compelling policy reason
379 otherwise, we should maintain the ability of states to make a
380 decision that is different from the Federal Government. All
381 three of these concepts are at play here today, and I think
382 we should examine each carefully.
383 On the first concept, what does the science tell us
384 about GE foods? From what I understand, genetic engineering
385 is not an inherently dangerous technology. Certainly, when
386 it is used to give new properties to plants, we need to make
387 sure those new properties don't affect the safety or
388 nutrition of food from those plants, but if FDA has done that
389 and finds that GE food does not differ in any significant way
390 from traditional food, why should there be a label that marks
391 it as different? If there are safety questions about a food,
392 then it should be--shouldn't be allowed on the market at all.

I look forward to hearing more from FDA and other witnesses on this today. Nevertheless, I understand that people may still want information about how their foods are produced. So let us look at the second concept of whether there is a way to give them meaningful and useful science-based information. On the one hand, I am concerned that people have the information they want or need. On the other hand, I am concerned that mandatory GE labeling could be inherently misleading. Mandatory labeling could lead consumers to believe that if the government is requiring a GE label, it must mean that GE foods are riskier or somehow fundamentally different from non-GE foods, and to date, scientists have concluded that they are not.

Furthermore, given that up to 80 percent of packaged foods contain GE ingredients, if we require labels, most food on the shelves would have a label declaring the presence of GE ingredients. I am not sure what good that does us. Under our current system, if consumers want to avoid GE foods, they can. They can buy organic foods which, by law, cannot contain GE ingredients. Or they can search out the foods that manufacturers have certified and labeled as non-GE. That more targeted information may, in fact, be more useable, and I would like to hear what our witnesses think about that.

Now let us turn to the third principle of preserving the

ability of states to make decisions that are right for their citizens, absent a compelling policy reason to the contrary. Even if there is not a compelling reason to require GE labeling at the federal level, that doesn't necessarily mean Congress should tell Vermont and other states that they cannot require such labeling. I have always believed states should have the right to act in the best interests of their residents. And I want to hear from our industry witnesses why the Vermont legislation, and potentially similar legislation in other states, is so harmful to some legitimate public interest that Congress should override them. Absent a compelling reason otherwise, I support letting states make their own laws and govern themselves.

I remain open to hearing the view of all of our witnesses today on these three points, and any other points pertaining to this issue. I think today's hearing will be very interesting and informative, and I thank the chairman for holding it.

[The prepared statement of Mr. Waxman follows:]

********** COMMITTEE INSERT **********

Mr. {Pitts.} Chair thanks the gentleman.

That concludes the opening statements of the Members. As always, the written opening statements of the Members will be made a part of the record.

I have a unanimous consent request here, a statement from the Corn Refiners Association, to enter into the record.

Without objection, so ordered.

[The information follows:]

********** COMMITTEE INSERT **********

Mr. {Pitts.} We have two panels today, and I would like to call our first panel, and I will introduce him at this time. We have Mr. Michael Landa, Director, Center for Food Safety and Applied Nutrition of the U.S. Food and Drug Administration. Thank you for coming today. You will have 5 minutes to summarize your testimony. Your written testimony will be placed into the record.

So at this point, Mr. Landa, you are recognized for 5 minutes for your summary.

^STATEMENT OF MICHAEL M. LANDA, DIRECTOR, CENTER FOR FOOD SAFETY AND APPLIED NUTRITION, U.S. FOOD AND DRUG ADMINISTRATION (FDA)

} Mr. {Landa.} Good morning, Chairman Pitts, Ranking Member Pallone, and members of the subcommittee. I am Michael M. Landa, Director of the Center for Food Safety and Applied Nutrition at the Food and Drug Administration. Thank you for the opportunity to be here today to discuss FDA's regulatory program for genetically engineered, or GE, foods.

Over the last 20 years, FDA has reviewed data and information on more than 150 plant-derived GE foods. These range from herbicide-tolerant soybeans to canola oil with a modified fatty acid profile. Based on our evaluations, we are confident that the GE foods in the U.S. marketplace today are as safe as their conventionally-bred counterparts. The section and genetic improvement of plants for agricultural use has been going on for thousands of years.

Mr. {Pitts.} Could you pull the mike a little closer to you please?

Mr. {Landa.} Sorry.

Mr. {Pitts.} Yeah, thank you.

Mr. {Landa.} That better?

Mr. {Pitts.} That is better, thank you.

Mr. {Landa.} Typically, plant breeding has involved cross-breeding and hybridization. Many of the foods that are already common in our diet, such as hybrid corn or nectarines, are obtained from plant varieties that were developed using such conventional genetic techniques, but during the breeding process, undesirable traits, such as poor yield or poor disease resistance, may appear. These unwanted traits can often be eliminated through additional breeding and selective reproduction, but the process is painstaking and time-consuming.

Today, by inserting one or more specific genes into a plant, scientists are able to produce a plant with new advantageous characteristics. These techniques give scientists the ability to isolate specific genes of interest, and introduce them and their corresponding traits into plants without introducing undesirable genes or traits. This important improvement over traditional plant breeding can reduce the time needed to develop a new variety, and expand the range of new proteins and other substances that can be introduced into plants.

Any of these genetic modification techniques has the potential to change the composition of food in a manner relevant to food safety. FDA, however, has well-established

scientific procedures for evaluating the safety of new foods, including any new substances in food, and our guidelines help developers address any safety concerns prior to marketing.

FDA regulates the safety of all foods, including those derived from GE plants under the Federal Food, Drug, and Cosmetic Act, to be called the Food and Drug Act. Foods developed from genetically-engineered plant varieties, such as fruits, vegetables, grains and their byproducts, are subject to the same safety requirements as foods derived from non-GE plants. The Agency relies primarily on 2 sections of the Food and Drug Act to ensure the safety of food and food ingredients produced by genetic engineering. The adulteration provisions in Section 402 of the Food and Drug Act, and the food additive provisions in Section 409.

Food growers, manufacturers and distributors are responsible for taking the steps necessary to ensure that their food products are safe. Law places primary responsibility for ensuring safety on food on industry. To help developers of food derived from GE plants comply with their obligations under the Food and Drug Act, and FDA's regulations, the Agency encourages them to participate in a voluntary consultation process prior to commercial distribution. Since the process was created, developers of GE plants have completed the process more than 100 times as

they sought to introduce plants into the U.S. market. Typically, the consultation begins early in development when the Agency advises the company on what tests would be appropriate to assess the safety of the new food. After the studies are completed, a summary of the data reflecting safety and nutritional assessment are provided to FDA for its review. FDA expects developers of GE foods to analyze the composition of the foods from their new crop varieties to ensure that any changes compared to the foods' conventionally-derived counterpart are appropriately considered and addressed before marketing such foods. As part of our review and analysis, we consider whether any newly-introduced protein is likely to be allergenic or toxic, and whether levels of important nutrients or anti-nutrients have been changed in a way that is important to food safety or nutrition. We also consider whether any newly-introduced protein requires premarket approval as a food additive.

Examples of the information evaluated by FDA include the name of the food and the crop from which it is derived, the source, identities, functions and stability of introduced genetic material, the purpose of the modification and its expected effect on the composition and characteristics of the food, the identity and function of any new substances introduced by the genetic material, a comparison of the

549 composition and characteristics of the GE food to that of
550 food derived from the parental variety, and information on
551 whether the genetic modification altered the allergenic--
552 allergic or toxic potential of the food.
553 Let me just speak for a minute or so about FDA
554 regulation of labeling. We regulate labeling including
555 labeling of GE foods under the Food and Drug Act and our
556 regulations. The Act establishes that a food is misbranded
557 if its labeling is false or misleading in any particular.
558 The Act also provides that labeling is misleading if it, one,
559 fails to reveal material--facts that are material with
560 respect to representations made or suggested in the labeling,
561 or two, fails to reveal facts that are material with respect
562 to consequences that may result from use of the food, whether
563 that is a labeled use or a customer use.
564 Historically, FDA has taken the position that the use of
565 genetic engineering and the development of food is normally
566 not, by itself, material information within the meaning of
567 the Food and Drug Act. Federal courts have held that absent
568 a material fact or a difference in food derived from a GE
569 source, the Act does not require labeling indicating that the
570 food has been developed through genetic engineering.
571 In closing, let me reiterate that the consultation
572 process for foods derived from GE plants is working well, and

provides for a rigorous food safety evaluation of such foods. The Agency will continue to be vigilant, ensuring the safety and integrity of the food supply.

And with that, I am happy to answer any questions.

[The prepared statement of Mr. Landa follows:]

********** INSERT A **********

Mr. {Pitts.} The chair thanks the gentleman.

We will now begin questioning. I will recognize myself 5 minutes for that purpose.

Mr. Landa, you state in your testimony that FDA has reviewed and evaluated data and information on over 150 genetically-engineered foods. Based on these reviews and the data that has been compiled over the past 20 years, is the Agency more or less confident today in the safety of the underlying technology?

Mr. {Landa.} I think its confidence remains strong. It has been and remains strong.

Mr. {Pitts.} How do you know that genetically-engineered foods are no different in terms of safety than their conventional counterparts?

Mr. {Landa.} Well, we know this based on the reviews we conduct. We are looking at the genetic material, we are looking at products of that material, new proteins, for example, at their safety. We look at toxicity--potential toxicity, allergenicity. We look at chemical composition to see whether it is different from the convention counterpart. We look at the safety of the whole food, if you will, and we look to see whether there are any differences in the nutrients that might require disclosure, for example.

Mr. {Pitts.} And how long, typically, does your evaluation take?

Mr. {Landa.} I will have to get back to you with detailed information, if I may.

Mr. {Pitts.} All right. Are there any material differences between genetically-engineered ingredients and those derived from traditionally-bred crops?

Mr. {Landa.} In general, no. We have found that there have not been such differences.

Mr. {Pitts.} Does the FDA support the various state, legislative and ballot measures that would require the labeling of genetically-engineered foods, or would these initiatives interfere with FDA's authority over food production or labeling?

Mr. {Landa.} We haven't reviewed the initiatives. We don't have any view about them and, therefore, we don't know whether they would interfere or not.

Mr. {Pitts.} Would state-specific labeling requirements change anything as far as your evaluation is concerned?

Mr. {Landa.} I do not believe so.

Mr. {Pitts.} All right. Let me ask if there currently is a lack of consensus about the validity of the research and science behind the safety of foods derived from genetically-engineered plant varieties.

626 Mr. {Landa.} I think there is not. That is, I think
627 there is a consensus.
628 Mr. {Pitts.} There is a consensus--
629 Mr. {Landa.} Yes.
630 Mr. {Pitts.} --in the scientific community?
631 All right, at this time, I will recognize Mr. Pallone 5
632 minutes for his questions.
633 Mr. {Pallone.} Thank you, Mr. Chairman.
634 Mr. Landa, some who oppose mandatory GE labeling argue
635 that such labeling would be inherently misleading. They
636 argue that such a requirement would easily be taken to imply
637 that the government considered food from GE plants to be so
638 fundamentally different from food from non-GE plants as to
639 warrant a special designation. And I guess I agree that if
640 the GE designation had to look like a warning, it would be
641 misleading. However, in the next panel, Mr. Faber testifies
642 that his organization is not asking for anything like a
643 warning label, but rather a modest disclosure on the back of
644 the package. And I guess I would like to get your view based
645 on your experience with food labeling whether it would be
646 possible to design the size and wording of a mandatory GE
647 designation in such a way as to be innocuous, in other words,
648 those who look for it could find it, those who don't care
649 about genetic engineering would have no reason to pay

attention to it. I am not asking whether FDA could require such a label, nor whether you think any form of mandatory GE labeling would be appropriate from a scientific perspective, just that if Congress were to decide that the best way to avoid multiple state GE labeling requirements would be to impose a federal GE labeling requirement, do you think it would be possible to do so in a way that would be neutral and would not tarnish the product. And also as part of your answer, if you could describe the FDA's experience with irradiation labeling and whether we could learn from that experience.

Mr. {Landa.} I don't--I certainly have not thought about the question you posed with respect to the nature of a statement about GE labeling. I don't think the Agency has considered that question because our focus has been on whether there is a difference--

Mr. {Pallone.} The material. The material definition.

Mr. {Landa.} --allowing us to require disclosure. I think one way of looking at that question is whether there are data on similar efforts, or whether one could design a study to answer that question so that people would look at different formulations of labeling, and you would learn what they would take away from those different formulations.

Mr. {Pallone.} I mean I--the reason I asked the

674 question, I know you--I guess you don't really feel you can
675 answer it at this point, is because, you know, a lot of
676 people that approach me that would like the labeling
677 requirement don't necessarily make the argument that there is
678 a scientific difference, but just that they should--or that
679 it is bad, but just that they should know.
680 Mr. {Landa.} No, I understand, I mean but one might,
681 for example--again, I think maybe one could develop different
682 formulations and do experimental studies surrounding them,
683 the types of studies that are typically done over the
684 internet with panels that are set up, they are large numbers,
685 to see what people would take away from a different mock
686 label.
687 Mr. {Pallone.} Okay. Now, I know you say that the
688 FDA's consultation process is--right now is obviously
689 voluntary, but what does that mean in practice? In other
690 words, if it is voluntary why would companies choose to use
691 it? Do you have an estimate of how many manufacturers choose
692 not to use it? In other words, what are the pros and cons of
693 this voluntary approach?
694 Mr. {Landa.} Well, we think for people intending to
695 commercialize product, we think those people do come to us
696 for several reasons. I mean, one, there is the basic
697 statutory requirement on companies to market food that is

698 safe. Another is that we learn a great deal from EPA and
699 from AFIS and from others about what is going on in this
700 area, which is another incentive for people also to come to
701 us. And finally, we think that growers are going to be
702 reluctant to use seeds where there isn't a--sort of a no-
703 questions letter from us because if, at the end of that
704 growing season, they have a crop that turns out to be either
705 unlawful or unmarketable because questions have arisen,
706 better to start with a product that has been through the
707 consultation process. So we think there are lots of drivers
708 that make the voluntary process one people do subscribe to,
709 at least people who are intending to commercialize.
710 Mr. {Pallone.} Now, you say that you--the FDA hasn't
711 required the genetically-engineered label because they don't
712 believe the information is material. Does the FDA have the
713 authority under the Act to change its assessment that
714 information is not material? Do you think you have the
715 authority to do that?
716 Mr. {Landa.} Yes, certainly in a given case. And let
717 me also say, we--the policy I have been describing and we
718 have been discussing, it has been in place for roughly 20
719 years, but we have been asked to change it. We have before
720 us several citizen petitions asking to change our view on the
721 law with respect to materiality, and asking us to change our

view with respect, in some cases I think, to the facts. And we are considering those petitions. We haven't responded yet, but we certainly have the authority to change a position as long as the change is appropriately grounded in the science and interpretation of the law.

Mr. {Pallone.} Thank you.

Thank you, Mr. Chairman.

Mr. {Pitts.} The chair thanks the gentleman.

Now recognize the vice chairman of the full committee, Mrs. Blackburn, 5 minutes for questions.

Mrs. {Blackburn.} I thank you, Mr. Chairman.

Mr. Landa, thank you so much for your time. I have to tell you, I find this an absolutely fascinating debate, and am so appreciative that you would take the time and the FDA would take the time to talk with us on it.

I grew up in south Mississippi with a grandmother who, when she went to college at the turn of the century, the 19th century, chose to audit agriculture classes. So then buying a farm and with her savings from being a teacher, and married, she has five boys from--and then my mother, five more boys. Big farm. During the Depression, she helps feed our hometown. So being someone who enjoys growing things, as I was, and very active in 4H club, which I was, and going on to be a part of a crop judging team, I learned to appreciate

what goes into having good-looking food, because we eat with our eyes. I also grew to appreciate yield per acre, that I would learn from my grandmother, and having foods that would be more drought-resistant, that would take less chemicals, that would take less pesticides, things of that nature, and the importance of that so that you had a good-looking and good-tasting food product that did not, as readily and easily, spoil.

So I come to this debate from that background, and today even in my district, I visited a lot of the farmers' markets, and every once in a while someone will come up and talk about genetically-engineered food or genetically-modified food, and I enjoy asking them what that means to them. And I have found it so fascinating that it means something different to nearly everyone that I talk to, because we don't have that federal standard, if you will. And I hope that you all at the FDA are going to be able to work with us on this. Basically, everything we eat is genetically-modified, whether it is corn or wheat or any variety of tomatoes, which were mentioned earlier, it all has been genetically modified. If you want to go back and eat original wheat or barley, it is not going to give you very much of a yield, and it is not going to be the desirable product that you are looking for today. So we have to realize that as a part of this debate.

So moving forward, let us go back to Mr. Pallone's question on the labeling. I would love to hear from you what you all at the FDA, what your team thinks should be conveyed in those labels to the consumer, what should be there about health, about safety, and about nutritional content of those products?

Mr. {Landa.} Well, the statute tells us as a general matter that labeling is not to be false or misleading. That is sort of the basic proposition. And since then, there have been many changes to the law, including an LEA, which has directed us to write the nutrition facts label--nutrition facts panel, which has information about macronutrients and micronutrients. And, in fact, we are in the process now of updating that label. We proposed earlier this year to do that, and we are reviewing comments on it.

Mrs. {Blackburn.} And when do you anticipate having those--

Mr. {Landa.} Well--

Mrs. {Blackburn.} --recommendations?

Mr. {Landa.} --I would certainly hope that the Agency could issue final rules updating nutrition facts by 2016. It is a complicated--it is called informal rulemaking, which is less difficult than formal rulemaking, but it is still a--

Mrs. {Blackburn.} Okay.

794 Mr. {Landa.} --very resource-intent process.
795 Mrs. {Blackburn.} I am about to run out of time. I
796 want to get to a couple of other things. I am certain you
797 all go through reams of information on analyzing data on the
798 GE foods, and I wonder how often do your FDA analysts go back
799 in and request additional information when you have a
800 submission?
801 Mr. {Landa.} I don't know. I can't answer that, but we
802 will get that information for you.
803 Mrs. {Blackburn.} Okay. Does the FDA distinguish foods
804 based on the method of breeding or the material composition
805 of the food?
806 Mr. {Landa.} Not for labeling purposes, unless there is
807 a material fact.
808 Mrs. {Blackburn.} Okay. Are you satisfied that your
809 agency is capable of understanding genetic engineering and
810 determining whether or not a plant is safe?
811 Mr. {Landa.} Yes.
812 Mrs. {Blackburn.} Thank you.
813 I yield back.
814 Mr. {Pitts.} Chair thanks the gentlelady.
815 Now recognize the ranking member of the full committee,
816 Mr. Waxman, 5 minutes for questions.
817 Mr. {Waxman.} Thank you, Mr. Chairman.

Mr. Landa, in many of the articles on GE foods, people claim that the science is unsettled, controversial or new, with the implication that there may be unknown risks and, therefore, consumers are justified in being uneasy with GE foods. And yet from your testimony, we get a different impression. However, while you point out that genetic engineering is just one of many techniques used in plant breeding, I don't think FDA has a consultation process for any of the others.

How new is the science behind GE foods, and what are the risks from them, and if genetic engineering is not especially risky, why do you encourage companies to go through your consultation process prior to marketing foods from GE plants?

Mr. {Landa.} I think it is largely a--there certainly is some possibility, for example, of a material difference. I think we identified one with a product where there wasn't a safety issue, but there was a difference in how the food performed in the consumer's hands. I think it had to do with friability. And we have completed over 100 consultations. There have been a handful that have not gone to completion where we were asked to stop the review, or the submitter withdrew. I think in general, the process, which has been in place for some time, was one that enabled us to learn and also to build confidence, and we would hope to transmit some

confidence in the--in this technology.

Mr. {Waxman.} Is this a new area of science?

Mr. {Landa.} No. I mean, certainly, it is decades old.

Mr. {Waxman.} As you know, many consumers believe they have a right to know whether a food was manufactured using genetically-engineered ingredients, irrespective of all the science in the world showing them to be no different from non-GE ingredients. I would like to understand more about such a requirement and how it would fit in with FDA's traditional stance toward labeling requirements if Congress were to respond to this consumer demand and pass a law requiring the label--labeling of genetically-engineered foods.

How would mandatory labeling of genetically-engineered foods compare with existing labeling requirements, such as to reveal the presence of allergens in a food, or that a food has been irradiated? Would FDA be concerned about a new law that requires the labeling of GE foods, and if so, why?

Mr. {Landa.} There isn't any administration position on any--on such legislation. It would be obviously new for us. We would implement it as best we could. I suppose the question it would raise would be what is sort of the limiting principle. If--what animates this is right to know, the question then becomes what is it that people do not have a

866 right to know on the food label, and I am not sure how one
867 answers that question.
868 Mr. {Waxman.} There are just some foods that are
869 irradiated. Why would anybody irradiate their food? Why
870 would a manufacturer want to irradiate food?
871 Mr. {Landa.} For safety reasons.
872 Mr. {Waxman.} To keep the food from spoiling?
873 Mr. {Landa.} Spices. Spices are irradiated, for
874 example.
875 Mr. {Waxman.} Okay. Now, is there any harm from that?
876 Any--
877 Mr. {Landa.} No.
878 Mr. {Waxman.} --consequences that are problematic?
879 Mr. {Landa.} No.
880 Mr. {Waxman.} Yet, we require labeling. Why do we
881 require labeling on foods that have been irradiated?
882 Mr. {Landa.} It has been thought that irradiation
883 could--as a process, could change some properties of the food
884 and also as a--and so that was the thinking behind that.
885 Mr. {Waxman.} But there is no evidence of that?
886 Mr. {Landa.} I would have to go look at the time--what
887 we said at the time we issued the labeling requirement.
888 Mr. {Waxman.} Now, why is this any different? You
889 don't think there is a problem. You said there may be a

problem but you don't know of a problem. What is the difference between informing people that their spices have been irradiated if they want to know that information, even though you don't think it is particularly helpful for them to know it?

Mr. {Landa.} I think at the--as I said, I think at the time with irradiation, we thought that there was a possibility of a change in characteristics of the food with--which people would not know about. We do not think that is the case with genetic engineering.

Mr. {Waxman.} Do you think we should remove the labels from irradiated foods?

Mr. {Landa.} The Agency has issued a proposal to do that. It has not finalized it.

Mr. {Waxman.} Okay, thank you, Mr. Chairman.

Mr. {Pitts.} Chair thanks the gentleman.

Now recognize the gentleman from Illinois, Mr. Shimkus, 5 minutes for questions.

Mr. {Shimkus.} Thank you, Mr. Chairman.

Thank you for being here. I--a question I have is, I understand the state debate, but does--do you know of any state that has the capability to do the research and the findings to the same standard as the FDA?

Mr. {Landa.} I don't, but I wouldn't have any reason to

know that one way or another.

Mr. {Shimkus.} Yeah. I can tell you I am from a big state of Illinois, and we can't do it. There may be one--maybe--well, maybe California has some capability, but my guess is smaller states, they don't have nearly the ability to do the research that you all do. And I think that is part of this whole should states be able to have their own labeling restrictions and requirements because, as we have found, it is really based upon emotion and not based upon a scientific evaluation.

Let me ask about--do you distinguish foods based upon the method of breeding, or the material composition of the food?

Mr. {Landa.} We don't require labeling based on method of production alone.

Mr. {Shimkus.} Why not?

Mr. {Landa.} Because we have found that it is not material to safety or nutritional composition.

Mr. {Shimkus.} Yeah, and I appreciate that. Let me--in the case of sugar, right, we--sugar processors require to label whether refined table sugar comes from--I am--I guess the questions is, are sugar processors required to label whether refined table sugar comes from a certain species or plant?

Mr. {Landa.} I am sorry, I don't--

Mr. {Shimkus.} So if you have--are we--you don't require fine table sugar to label whether it comes from sugar beets or from cane.

Mr. {Landa.} No.

Mr. {Shimkus.} Why?

Mr. {Landa.} Again, I think it is a question of materiality, to safety or nutritional--

Mr. {Shimkus.} So if--

Mr. {Landa.} --composition.

Mr. {Shimkus.} If we were--would the consumers be any-- would they get any benefit if that labeling requirement for fine table sugar also had a requirement, well, this is beet- produced fine table sugar or sugar cane fine table sugar.

Mr. {Landa.} Again, what we focus on is the attribute of the food as the consumer would--

Mr. {Shimkus.} And--

Mr. {Landa.} --would eat it.

Mr. {Shimkus.} --for the genetically-engineered ingredients in foods today, is there any evidence that they vary in their objective characteristics in any meaningful or uniform way?

Mr. {Landa.} No, not as a class.

Mr. {Shimkus.} Can you explain why FDA's regulatory

focus is on the food or food product as opposed to the process in which it was grown?

Mr. {Landa.} Because, of course, in the end, it is the food that we eat.

Mr. {Shimkus.} Right. Yeah, and I appreciate--I think you are going to keep getting the same questions from members here on trying to understand--you are Food and Drug Administration, you all come before us on a lot of different aspects. You are our trusted advisors. We respect the job that you do. I know this is a very difficult and emotional debate for some folks on both sides because it deals with some individual consumers, it deals with the agricultural community that many of us represent. We have to have an impartial, you know, observer based upon health and safety effects to the consuming public. We appreciate the work you do.

Mr. Chairman, thank you, and I yield back.

Mr. {Pitts.} Chair thanks the gentleman.

Now recognize the gentlelady from California, Mrs. Capps, 5 minutes for questions.

Mrs. {Capps.} I thank you, Mr. Chairman, and thank you, Mr. Landa, for your appearance here with us today, your testimony.

I understand that FDA's position that under the Food,

Drug and Cosmetic Act, the breeding methods by which a plant was developed is not material information about food from that plant. However, in their testimony, Mr. Faber and Representative Webb point out that many consumers do believe that foods labeled as natural--in quotes, ``natural'', are not genetically engineered, and sometimes buy such foods because of that belief. They also say that many such foods do contain GE ingredients.

I can understand FDA's reluctance to wade into the argument as to what constitutes natural, but if many consumers believe that the term natural implies non-GE, and making purchasing choices based on that belief, shouldn't the use of that term on a food label be considered a representation that the food is, in fact, non-GE? I know that is kind of a packed question, and I am going to continue just for a little bit more, give you plenty to deal with. This is my only question, actually. And if so, wouldn't the use of the term natural on a food containing GE ingredients be, as the statute says, failing to reveal facts and material in light of such representation if it does not state that it contains GE ingredients? Gets convoluted. In other words, and this is the question, even though the use of genetic engineering may not be material information, per se, doesn't it become material information in those circumstances in

which the rest of the labeling of the GE food implies that the food does not contain GE ingredients?

If you can sort that out, kudos to you, but this is the topic I wish to hear from you. And take your time because the--

Mr. {Landa.} Well--

Mrs. {Capps.} --for the next few minutes.

Mr. {Landa.} --I mean there is a short answer to this, which is that we have pending several citizen petitions related to the question of what is natural, including one going to the very question I think you are getting at which is, is the food that contains a genetically-engineered ingredient, or ingredient derived from a genetically-engineered plant, a food that may properly be labeled as natural. There is a big debate about that. We have been petitioned to say yes. I am sure we petitioned--we have been petitioned to say no. We have been petitioned to establish a definition for natural, and we are considering those petitions. That is really all I can say at the moment.

Mrs. {Capps.} Is there any--can you shed any light on this topic for the sake of our constituents as to where you are going in your--I mean I agree, it is very confusing.

Mr. {Land.} Well, I--one possibility, we have not committed to this, but to take you back a little bit, the

Agency embarked on an effort to define natural years ago. That did not result in codified--a codified definition. It resulted in a statement and a preamble that natural can't be either added or synthetic, I think was the language. We have been asked on many occasions to develop a definition. I personally have been asked on many occasions. I have always said that we really don't have the resources to do that.

We now have petitions before us. I think if we decide to reconsider this issue, it will necessarily have to be a public process. Whether we would embark on rulemaking, which has to be a public process, or guidance, there will be some public process if we decide to revisit this.

Mrs. {Capps.} Well, I actually applaud that. I think the public is already engaged, I believe that, and would be welcoming--this is my opinion now, but from what my constituents are telling me, that they are already engaged, and a signal from FDA that--maybe you don't have black-and-white kind of answers to give, that you are seriously considering this, and maybe that we can carry on this kind of conversation throughout the country. It appears to me the consumers are clearly confused by the current labeling system. I mean we can perhaps all agree on that; it is complicated today. And they are making purchasing decisions based on, sometimes I believe, misleading or unclear

labeling. And I am not blaming, necessarily, here, but it is--it leads to a state of confusion. And I hope that you can find the resources in FDA to take a broader look at what is happening with--in--with respect to consumers' experiences so that they can have confidence in this system that we have and work with us--you to strengthen the labeling system to reduce the kind of confusion that we are talking about.

With that, I will yield back. Thank you.

Mr. {Landa.} Thank you.

Mr. {Pitts.} Chair thanks the gentlelady, and now recognizes the gentleman from Virginia, Mr. Griffith, 5 minutes for questions.

Mr. {Griffith.} Thank you, Mr. Chairman.

Okay, I eat a fair number of odd foods, and a number of those are labeled non-GMO. Is there a distinction between genetically modified and genetically engineered?

Mr. {Landa.} I think as a technical matter, GMO refers to an organism, as opposed to genetic engineering which we think of as having to do with sort of modern biotechnology.

Mr. {Griffith.} Okay. In that regard, one of the concerns that I have, and I want to know if it is a concern for you, is that I come from a family where just about half of us have some kind of food allergy. If you are changing proteins around and you have things that are, for the general

public, recognized as safe--generally recognized as safe, are you able in what you all do to be able to distinguish if a protein that someone may be allergic to has been added to a product which they may not know that protein has just been included?

Mr. {Landa.} That is the--part of the evaluation process, and if there were to be an addition that might prompt an allergic reaction that one would not expect, we would require a label disclosure.

Mr. {Griffith.} So you would pick out those things which people are--

Mr. {Landa.} Right.

Mr. {Griffith.} --highly allergic to, or which there is a significant percentage of folks that have a problem with, and you say, okay, you can't put the strawberry ingredient into this--

Mr. {Landa.} Or we would--

Mr. {Griffith.} --tea?

Mr. {Landa.} Or we would require disclosure.

Mr. {Griffith.} Or disclosure.

Mr. {Landa.} Most likely would be the--

Mr. {Griffith.} And I apologize if I missed this in one of your earlier answers, are you all looking at the possibility of--for those people who may be concerned, saying

or labeling a product as something that is, in fact, as opposed to saying it is genetically engineered or genetically modified in some way, having those companies that want to, obviously you pay more for it, but be--have some process where they can actually say we have used all products that are not genetically engineered or modified?

Mr. {Landa.} We have had guidance--draft guidance for--since about 2001 on voluntary labeling. So there isn't any prohibition on a voluntary label that you--your food does not contain--

Mr. {Griffith.} Okay.

Mr. {Landa.} --GE ingredients. So the basic requirement is that statement not be false or misleading.

Mr. {Griffith.} Okay. And I appreciate that. You indicated earlier that it was pretty much a consensus that this was not something that was dangerous, if I understood your testimony correctly, and yet I know there are a number of countries around the world that have concerns about products, and sometimes will ban our exports if they think that it is--that there has been some crosspollination or something. Can you explain why they are concerned?

Mr. {Landa.} I think different countries have different regulatory systems. There are obviously different cultures with different attitudes towards different aspects of foods,

from production to consumption to preparation and everything else. I think that has been--

Mr. {Griffith.} Other than culture, have any of those countries had studies that indicated there was some danger to the human--

Mr. {Landa.} Not--

Mr. {Griffith.} --to the general human--

Mr. {Landa.} Not to my knowledge, no.

Mr. {Griffith.} All right. I appreciate that. And I think you said earlier you are looking at finalizing some guidance by 2016?

Mr. {Landa.} The nutrition facts?

Mr. {Griffith.} Yes, sir.

Mr. {Landa.} Yes.

Mr. {Griffith.} All right. And I am going to switch just briefly, because I have a little bit of time left, into a different subject and--but it is tangentially related, and that is, what do you do about the grocery stores that are fixing food and selling things, and they have to do nutrition facts, and then you get into the whole allergens and then the GE or GMO foods? How do you deal with all of that as a part for--

Mr. {Landa.} Well--

Mr. {Griffith.} --groceries stores that fix the food--

Mr. {Landa.} --I mean the processed food is subject to nutrition facts.

Mr. {Griffith.} Right.

Mr. {Landa.} What we have called restaurant-type food made and sold in a grocery store is now subject, or will be when it becomes effective, to menu labeling requirements. Those--

Mr. {Griffith.} I think--I will just tell you, I think that even though I am concerned about it, and I might not eat the food if I didn't know what was in it, I am not sure how a grocery store is going to be able to comply with that when they may be using all kinds of different ingredients, and somebody walks up and says can I have X, Y or Z, it may be easier for--like a McDonald's where they have certain ingredients and every one of them has a label, a grocery store may not have that capability.

Mr. {Landa.} Well, we are talking about standard menu items, so I think--

Mr. {Griffith.} Standard menu items, so if it is some kind of specialty item they would--

Mr. {Landa.} Right.

Mr. {Griffith.} --they would have an exemption?

Mr. {Landa.} Because--yeah, again--

Mr. {Griffith.} All right.

Mr. {Landa.} --the requirement is establish--20 or more establishments, a restaurant and similar retail establishments is the language in the statute, and it is standard menu items.

Mr. {Griffith.} All right, I appreciate that.

Thank you very much, and I yield back.

Mr. {Pitts.} Chair thanks the gentleman.

Now recognize the gentleman, Mr. Butterfield, 5 minutes for questions.

Mr. {Butterfield.} Thank you very much, Mr. Chairman.

Let me just remark on the statement made by Mrs. Blackburn a few minutes ago about this being a fascinating debate. Mr. Chairman, this is certainly a fascinating debate by any measure.

In my former life, I served as a trial judge down in North Carolina, and every day for 15 years I had to look at the evidence and had to decide the facts. That was my job description, and I did it for 15 years. And I have tried to do that in this debate. And I have read large amounts of well-informed publications over the last several months, and I for one, I am just convinced that GE plants are as safe as any other foods.

But, Mr. Landa, I need to interpose this question to you. Do you have any evidence that foods derived from GE

plants are as safe as other foods? I have heard you mention it throughout your testimony, but is there any scintilla of evidence that would suggest that these foods are unsafe?

Mr. {Land.} I am--I want to make sure I heard you correctly. Is there any evidence that suggests that these foods are unsafe?

Mr. {Butterfield.} Yes. Yes. That GE foods are unsafe.

Mr. {Landa.} Not to our knowledge, no.

Mr. {Butterfield.} All right. And how long does your agency, and how large is the division that handles this task?

Mr. {Landa.} Well, the office that handles that task has maybe 135 or 140 people, but certainly not all--those people handle a variety of tasks related to food additives, generally recognized as safe substances.

Mr. {Butterfield.} But these are not politicians, these are career employees at your agency?

Mr. {Landa.} Correct.

Mr. {Butterfield.} Yeah. Have you encountered anyone, anyone who advocates a 50-state approach to mandatory labeling?

Mr. {Landa.} I am not sure I--

Mr. {Butterfield.} I am just--I mean you have talked to a lot of people, both formally and informally, about this,

and--

Mr. {Landa.} Anyone who advocates--

Mr. {Butterfield.} Who advocates a--

Mr. {Landa.} --that we have 50 separate--

Mr. {Butterfield.} Fifty separate sets--

Mr. {Landa.} --sets of requirements?

Mr. {Butterfield.} --of regulations, plus the District of Columbia.

Mr. {Landa.} I have not--

Mr. {Butterfield.} I happen to find it to be--

Mr. {Landa.} I don't know that I have a reason to encounter such a person, but no.

Mr. {Butterfield.} It seems to me illogical and irrational and--but I am wrong from time to time, but I don't see how that would ever work, even in California.

I yield back.

Mr. {Pitts.} Chair thanks the gentleman.

Chair recognizes the gentlelady from Illinois, Ms. Schakowsky, 5 minutes for questions.

Ms. {Schakowsky.} Thank you, Mr. Chairman.

I am trying to sort out the science here. I have lots of passionate constituents who are very concerned about GE products. I have experts that we will hear on the next panel who have great scientific credentials themselves, who will

argue about consumer information being provided about GE products.

I want to follow up on another word. Mrs. Capps was talking about natural, I want to ask you about material difference. And you said that the FDA could change its view that GE status of food is not material, which it is--that is the position right now, there is no material difference, and that the Agency is evaluating citizens' petitions that report to do that. So can you elaborate on why the FDA has not believed this is a material difference, and what--have the courts said anything about it, what kind of different information might change your mind?

Mr. {Landa.} Well, we haven't found any differences in relation to safety or nutritional composition or--I mean again, as--considering these foods as a class, any differences in safety or nutritional composition, or any other attribute of the food.

Ms. {Schakowsky.} Can I ask you one thing? What about food allergies? Since we are putting in a--into the DNA something from perhaps a peanut into--

Mr. {Landa.} In that case--

Ms. {Schakowsky.} --something else--

Mr. {Landa.} In that case we would require disclosure. That would be material.

Ms. {Schakowsky.} And would that prevent, in this consultation process, from that particular formulation going to market?

Mr. {Landa.} No. What would happen is there would be a disclosure of the allergic potential of the food.

Ms. {Schakowsky.} I see.

Mr. {Landa.} That would be a material fact.

Ms. {Schakowsky.} Okay, and a seed that--I know Mr. Pitts said you can use less pesticide. That is sometimes true, although the FDA has just approved use of a seed that would make a--it more tolerant of a lot more pesticide. Does the FDA have any concerns about that?

Mr. {Landa.} I am not familiar with that matter, I am sorry.

Ms. {Schakowsky.} 2.4-D and Glyphosate. Anyway, okay. We will--so in--so material, meaning even in the peanut issue, then a disclosure would be for--required because of safety?

Mr. {Landa.} Typically, with respect to allergens, yes, that is--I mean, first of all, there is a statute--a 2004 statute requires disclosure of the--sort of what we call the big 8 allergens, but if you were to find another allergen, you would--typically, we would required disclosure of it rather than ban the food.

Ms. {Schakowsky.} And who does the research? I have to tell you, my constituents who are against GMOs will say Monsanto, DuPont and, you know, can we really trust these companies that benefit so much.

Mr. {Landa.} That data that are supplied to us are supplied to us by the companies doing the consulting, and they will do--sometimes they will do the studies, sometimes they will pay to have the studies done. I mean I will say that is true across all FDA-regulated products. FDA does research, but it does not do research on the scale that would be required to support voluntary submissions, much less marketing applications.

Ms. {Schakowsky.} Let me ask one more question. Does the Food and Drug Administration have the authority to implement a mandatory premarket approval process to--of any food to ensure that it is safe for consumers?

Mr. {Landa.} We proposed a number of years ago a mandatory notification program for the types of products we have been talking about this morning. That proposed rule is still in existence. We have not found the need to finalize it, given what we think is how well the voluntary program works, but that proposal necessarily maintained that we had the authority to establish a mandatory program.

Ms. {Schakowsky.} And in the--I will--I yield back. I

can put some more questions in writing. Thank you.

Mr. {Pitts.} Chair thanks the gentlelady.

Just for clarification, when you say it requires disclosure, does that mean--

Mr. {Landa.} Label.

Mr. {Pitts.} --on a label?

Mr. {Landa.} On a label. I am sorry, yes. Thank you for that question. Yes.

Mr. {Pitts.} Yeah. Okay. Thank you.

Gentleman, Mr. Matheson, is recognized 5 minutes for questions.

Mr. {Matheson.} Well, thanks, Mr. Chairman.

And, Mr. Landa, I appreciate you coming here today.

I just--you just said this with Mr. Butterfield, but I just want to be clear, from the FDA perspective to date, you have found no scientific evidence that there is a health and safety issue with genetically-engineered foods?

Mr. {Landa.} That is correct.

Mr. {Matheson.} Okay. I appreciate that. If there is this consumer demand for wanting to know, if there is a producer of a non-GMO food in the organic industry, they can label their product as such that it is non-GMO, is that correct?

Mr. {Landa.} So long as the labeling is not false or

misleading, that is correct.

Mr. {Matheson.} So if the marketplace wants this, there is a private sector opportunity for the organic food industry to provide that information to consumers if they so choose?

Mr. {Landa.} That is correct.

Mr. {Matheson.} Does the FDA have any regulatory authority over that type of labeling?

Mr. {Landa.} It is the general authority that labeling must not be false or misleading.

Mr. {Matheson.} How long has the FDA been involved in managing food labeling?

Mr. {Landa.} Well, the provision--the false or misleading provision dates from either 1906 or 1938--

Mr. {Matheson.} Long time.

Mr. {Landa.} --I am not sure which.

Mr. {Matheson.} We will stipulate it is a long time. And how is the FDA's role in terms of, if I am in the food industry, and there are a lot of different people in it, how does the FDA's role give signals to the food industry for how they do labeling? I mean is there a--they look to you for guidance, they look to you for consistency, is that correct?

Mr. {Land.} Correct. They look to the statute, they look to regulations we issue, they look to guidance we issue, and they certainly, when they have particular questions,

1370 companies will call our experts in labeling.
1371 Mr. {Matheson.} So how do your guidances work? How do
1372 you come up with those labeling guidances and how do they
1373 work?
1374 Mr. {Landa.} Typically, on a significant issue, we
1375 would issue what is called a draft guidance. We would call
1376 for comment on it. We would analyze the comments we receive,
1377 and issue it in final, with or without changes, or perhaps
1378 decide not to issue it at all, or to reissue it with
1379 substantial changes and calling for more comment.
1380 Mr. {Matheson.} And the food industry relies on that.
1381 That is where they get their direction for how they do
1382 labeling is from your guidances?
1383 Mr. {Landa.} First the statute, then the regulations--
1384 Mr. {Matheson.} Got you.
1385 Mr. {Landa.} --and then guidance, yes.
1386 Mr. {Matheson.} How do food manufacturers--I want to
1387 address this issue about a national system versus a 50-state
1388 patchwork system. How do food manufacturers, from the big
1389 guys to the little guys, how do they benefit from a national
1390 system?
1391 Mr. {Landa.} There is a benefit to uniformity, but I--
1392 you know, I think the answer is that they will--they are in a
1393 better position to tell you how much of a benefit that is to

them than I am.

Mr. {Matheson.} How do consumers benefit from a national system compared to 50 different sets of rules around our country?

Mr. {Landa.} I--you see the same labeling for the same product--

Mr. {Matheson.} There you go. People do cross state lines, don't they?

Mr. {Landa.} --wherever you purchase it.

Mr. {Matheson.} Yeah. Yeah. Funny how that works. I go 2,000 miles every week back and forth. Yeah, so I think that I would suggest, not to answer for you, that you are going to confuse consumers if you have 50 different standards. That would be my suggestion.

Let me ask you a question. How would a--how do you in the FDA resolve a situation if a product is mislabeled? What do you do if some manufacturer mislabels a product?

Mr. {Landa.} Typically, we would--we might call the manufacturer, we might issue what is called a warning letter-

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Mr. {Matheson.} Um-hum.

Mr. {Landa.} --depending on how serious we thought the infraction was. If the label were not corrected, ultimately we can, through the United States Department of Justice,

seize the product that is misbranded because of a misleading label--

Mr. {Matheson.} Right, so you have just--

Mr. {Landa.} --we can enjoin further distribution.

Mr. {Matheson.} You have just defined, as the regulator in this industry for food labeling, you have just defined you have the tools in the toolbox you have to address situations or mislabeled, that is what I would suggest.

You have been--the FDA--there have been claims by some consumer groups that the FDA is too closely aligned with the industry and it can't be trusted. How would you respond to that criticism?

Mr. {Landa.} I have been a--at FDA for almost 30 years. I work with people who have been there much longer, by the way. I think I believe, and my colleagues believe, that we are civil servants, that we are engaged in an honorable professional and an honorable activity. It does not mean we get every decision right any more than anyone on the planet gets every decision right, but we try to make decisions to the best of our ability based on what the science tells us, and based on the law and the regulations and sound policy.

Mr. {Matheson.} Well, Mr. Landa, I appreciate that answer, and I thank you for your civil service. I think there are a lot of folks in the agencies who are trying to do

the right thing, and appreciate your forthrightness in these questions today.

I will yield back, Mr. Chairman.

Mr. {Pitts.} Chair thanks the gentleman.

Now recognize the gentleman from Texas, Mr. Green, 5 minutes for questions.

Mr. {Green.} Thank you, Mr. Chairman, and ranking member for having--Pallone for having the hearing today, and our witness for being here.

Ensuring the safety of my constituents has always continued to be the top priority as a member of Congress, and I hope that your testimony today, we can come to a greater understanding of the vital role that bioengineering plays in our food supply and the economy.

Mr. Landa, thank you for taking your time to be here, and like my colleagues, we appreciate your 30 years of service to the FDA. I find this issue, as heated as it is, often leads to passionate claims, and I hope your years of experience at FDA can shed some light on the science of genetically-modified organisms, and the safety process behind their approval.

How many new plants are reviewed by the FDA each year, and how much time does it take to conduct those reviews?

Mr. {Landa.} We will have to get back to you on that.

The--

Mr. {Green.} Okay.

Mr. {Landa.} The number of completed reviews is about now, I think, 103. I think in five cases submissions were withdrawn or people asked us to cease the review, but I can't--we will have to get back to you on--

Mr. {Green.} Okay.

Mr. {Landa.} --yearly figures and time--average times.

Mr. {Green.} Okay. Do you believe changing from the voluntary reviews to mandatory reviews would change the number of reviews performed by the FDA each year?

Mr. {Landa.} I don't know, but I don't see why it would.

Mr. {Green.} Okay. A coordinated frame work was developed by the White House Office of Science and Technology Policy to leverage the regulatory safety expertise present in the Federal Government agencies like the FDA. In the 30 years that the Agency has been part of this, are you satisfied that your agency is capable of understanding genetic engineering and determining whether or not a plant is safe?

Mr. {Landa.} Yes.

Mr. {Green.} Do you feel the FDA has the staff and capabilities to be the voice of authority when it comes to

GMO safety?

Mr. {Landa.} In connection with foods in my center, yes.

Mr. {Green.} Food safety. Do you feel that the coordinated frame work requires adequate safeguards for consumer health and safety, and gives companies the regulatory certainty they need to develop new products?

Mr. {Landa.} Yes.

Mr. {Green.} Has a GMO plant been deemed unsafe in the past voluntary review process?

Mr. {Landa.} I am sorry, I didn't--

Mr. {Green.} Has a GMO plant been deemed unsafe in the past voluntary review processes?

Mr. {Landa.} Not that I am aware of.

Mr. {Green.} Okay. Was a safety issue due--is--if it was, is--if it did, and it hasn't been, but is it due to the genetic engineering or is other factors that you look for when you are inspecting them?

Mr. {Landa.} Again, I am not aware of any consultation that has resulted in a finding of lack of safety. We have-- the ones we have completed, we obviously have concluded we don't have any questions. There were a handful that did not go to completion. They were either withdrawn or we were asked to stop the review, and I simply don't know the details

of sort of the reasons, but for the--

Mr. {Green.} What happens when you are asked to stop the review?

Mr. {Landa.} We stop the review and the products do not go to market.

Mr. {Green.} Okay. So by just stopping your review, they don't go to market, okay. So effectively, you are doing what a regulator would--is supposed to do.

Was the frame work rooted in congressional enactments like the Food and--the Federal Food, Drug, and Cosmetic Act, Federal Meat Inspection Act, the Federal Insecticide, Fungicide, and Rodenticide Act, and do you feel that these statutes all, to some extent, preempt state requirements?

Mr. {Landa.} It varies enormously across statutes. There is--I simply can't answer that question.

Mr. {Green.} And have they--have these--each of these statutes, including the one from 1906, been instrumental in consumer protection?

Mr. {Landa.} I can speak to the Food and Drug Act. I think the answer to the question is yes. It dates from '06, was amended in '38. Multiple, multiple times since then. I think in order to protect and promote the public health.

Mr. {Green.} Do you have any suggestions on how we might look at some of these Acts and make your job more

effective? You can get back to us if you want because I know--but--because that is our job is, if you don't have--

Mr. {Landa.} We are certainly happy to--

Mr. {Green.} --the tools to do it--

Mr. {Landa.} --provide technical assistance whenever you ask us to do that.

Mr. {Green.} Okay. Thank you.

And, Mr. Chairman, I will yield back my time.

Mr. {Pitts.} Chair thanks the gentleman.

Now recognize the gentleman from Maryland, Mr. Sarbanes, 5 minutes for questions.

Mr. {Sarbanes.} Thank you.

Thank you, Mr. Landa. This is kind of a random question, just picking up on your allergy discussion. Presumably, I mean now you were suggesting that most ingredients, to which there is an allergy of any significance, you require that that be disclosed, right?

Mr. {Landa.} Congress required it in 2004.

Mr. {Sarbanes.} Okay, and--but FDA would determine at some point that if the number of people affected by that ingredient, in terms of an allergy, reached a certain percentage of the population or something, then it would flip into a banning of the ingredient? Like sort of where is that line? Just--

Mr. {Landa.} No, it is not banning, it is a disclosure requirement. Disclosure in the labeling, as the chairman was reminding me earlier, so that if we were to conclude that a food ingredient that is not on the list in the 2004 statute, that--met a certain threshold, and I can't answer what that threshold is in terms of percentage of population, we would require a disclosure of it on the label.

Mr. {Sarbanes.} So you are talking about meeting a certain threshold in terms of requiring disclosure. I am asking you whether there is a threshold that one might meet that would suggest that--

Mr. {Landa.} That we would ban it?

Mr. {Sarbanes.} --you just ban it. I mean if 95 percent of the population is allergic to a certain ingredient--

Mr. {Landa.} Of course. I mean the--

Mr. {Sarbanes.} Okay.

Mr. {Landa.} The--let me give you an example. The oldest adulteration provision in the law says, among other things, if a food bears or contains a substance that renders the food ordinarily injurious to health, the food is adulterated. And if it is adulterated, it is prohibited from interstate commerce. So sure, of course, I mean if you--if there was an ingredient that caused illness in, you know, 90

percent of the population, that would--people who ate the food containing the ingredient, the--we would ban the ingredient.

Mr. {Sarbanes.} All right.

Mr. {Landa.} I am sorry. I thought you were sort of--

Mr. {Sarbanes.} Right.

Mr. {Landa.} --trying to get at the disclosure question.

Mr. {Sarbanes.} I got you. So let me switch. I just--I am curious about when the industry has to go change labels in response to, say, some consultation exercise where everybody realizes that that is the right thing to do, or something more prescriptive that you require--well, first of all, is it the case that these labels get created and they are sort of static for extended periods of time, or in your experience, is labeling constantly being revised and updated, both with respect to content potentially, but also just in terms of the form of it, the way it looks on packaging and--

Mr. {Landa.} I--

Mr. {Sarbanes.} --all of this?

Mr. {Landa.} I really don't know.

Mr. {Sarbanes.} Um-hum.

Mr. {Landa.} I am just not familiar enough with industry practice--

Mr. {Sarbanes.} Do you--can you--

Mr. {Landa.} --to answer that question.

Mr. {Sarbanes.} In your 30 years, when was the last time that you can remember that something the FDA did, or some realization that the food industry came to, resulted in a significant, across-the-board change in labeling?

Mr. {Landa.} Well, the--I mean the one that comes immediately to mind is nutrition facts--

Mr. {Sarbanes.} Um-hum.

Mr. {Landa.} --which is a regulation that is now the basic--the heart of it is now I guess about 20 years old. We required disclosure of trans fat, 8, 9--

Mr. {Sarbanes.} So that was pretty significant.

Mr. {Landa.} --8, 9, 10 years ago where, as I mentioned earlier--

Mr. {Sarbanes.} Yeah.

Mr. {Landa.} --with the revising nutrition facts, and--

Mr. {Sarbanes.} So if you revise what is required in the nutrition fact--

Mr. {Landa.} Right.

Mr. {Sarbanes.} --panel in this rulemaking period--

Mr. {Landa.} Right.

Mr. {Sarbanes.} --between now and 2016, or whatever it was--

Mr. {Landa.} Right.

Mr. {Sarbanes.} --and you decide there are some additional things that ought to be in there, then that would cut across the entire food industry in a significant way in terms of revising its labels, right?

Mr. {Landa.} Correct.

Mr. {Sarbanes.} Thank you.

Mr. {Pitts.} Gentleman's time has expired.

The chair recognizes gentleman, Mr. Pompeo, 5 minutes for questions.

Mr. {Pompeo.} Great, thank you.

Thank you, Mr. Landa, for being here today. Thanks for your 30 years of service. I understand you are closer to the end of your service than the beginning at this point, and--

Mr. {Landa.} Yes, thank you.

Mr. {Pompeo.} --and thank you for your good work. Thanks for your testimony this morning too. It has been interesting to watch. I think lots of folks watching this hearing this morning have been surprised by the certainty you are expressing around the science. You used the word initially that there is a consensus. I thought I would try and parse into that just a little bit more.

So when you--I have heard consensus, and that can be 70/30 or 80/20 or 90/10, where--if you--tell me how much

science there is that would refute your position with respect to the materiality of genetically-engineered foods being--

Mr. {Landa.} Well--

Mr. {Pompeo.} --safe.

Mr. {Landa.} We do not believe, again, as a class that there is any question about safety, based on the reviews we have done.

Mr. {Pompeo.} And that would include just--

Mr. {Landa.} I--

Mr. {Pompeo.} Go ahead.

Mr. {Landa.} There are obviously people, scientists, who differ with that point of view. I don't know how many of them there are.

Mr. {Pompeo.} But it is a tiny fraction.

Mr. {Landa.} It certainly is. So small--

Mr. {Pompeo.} And not folks that the FDA, at least, gives significant credit to, certainly enough that you would change your view with respect to the safety of this food. You all have been very decisive.

Mr. {Landa.} To date, we have seen nothing to change the view that we have had for a number of years now.

Mr. {Pompeo.} And that would include--there were questions about what other countries have done--

Mr. {Landa.} Yes.

Mr. {Pompeo.} --and how their regulatory practice--

Mr. {Landa.} That--

Mr. {Pompeo.} --would include studies performed all across the world--

Mr. {Landa.} That is--

Mr. {Pompeo.} --as well.

Mr. {Landa.} That is correct.

Mr. {Pompeo.} I have heard some of my colleagues talk about a patchwork of 50 sets of rules and what that might do. Just so we are all clear, it wouldn't just be 50 sets of rules, it is potentially thousands of sets of rules; cities, counties, townships, neighborhood associations. One--the mind reels with respect to folks who might want to confirm their theory of a right to know through some sort of statutory or municipal rule. Tell me what you think that complexity would do the safety of the food supply chain.

Mr. {Landa.} I don't know that it would have an effect on safety.

Mr. {Pompeo.} Right the confusion consumers--we were talking about this, Mr. Matheson, he said he had to go 2,000 miles. You might only have to go 2 miles to pass into a city that had a different set of rules. I think there would be massive confusion, and the impact that that would have on consumers' ability to understand what they were consuming

would be pretty significant.

Mr. {Landa.} I suppose it could be. My point was that the underlying safety of the food would not be--

Mr. {Pompeo.} Wouldn't change. Absolutely.

You have talked a bit about your premarket consultation process. Today you said that most of the folks are--entering this into commercial service have provided that for you. You said you have gone through 100. A few have been withdrawn. I want to make sure, no one has run through the stop sign today where FDA has said, hey, we have a question or a concern, and they have said, good for you, we still want to introduce this product to the marketplace.

Mr. {Landa.} That is correct.

Mr. {Pompeo.} No one has run through the stop sign. It is--

Mr. {Landa.} That is correct.

Mr. {Pompeo.} --not your expectation that anyone ever would because it would be very difficult for a commercialized food product to have run through an FDA letter that says, hey, we think we have a health or safety issue.

Mr. {Landa.} That is our view, yes.

Mr. {Pompeo.} You talked about petitions for--and actually, we are going to give you another one if I get this Bill passed into law, it--this law contains a provision which

would require the FDA, within 24 months, to propose a regulation with respect to natural. I agree with some of my colleagues, frankly, on both sides of the aisle that I think we ought to clear that up so that consumers have a good idea what that really means. I understand the difficulty of that task and why you all have not come to fruition on that yet, but know that if we are successful in getting this particular Bill passed, you will get to be successful in your endeavor as well.

Has anyone--so there have been proposals in some cities and some states about labeling for genetically-engineered products. Have any of those folks come to you or to the FDA to ask for your wisdom about what that label ought to look like, or about the safety or science behind genetically-engineered foods?

Mr. {Landa.} Not that I am aware of.

Mr. {Pompeo.} So no--so to the best of your knowledge, no one--none of the states have come to you to say, hey, what do you--what does the FDA think about this?

Mr. {Landa.} And--not that I am aware of. It is certainly conceivable that someone from--

Mr. {Pompeo.} Sure.

Mr. {Landa.} --a state would have come somewhere in the agency, but not that I am aware of.

Mr. {Pompeo.} And I guess my last question is, this Bill proposes that we would make the review process at FDA mandatory as opposed to voluntary. Assuming that we provide the resources to the FDA, such that they can handle all of the requests for review, do you think that is an improvement, that is, do you think it is the case that each of these products ought to be submitted for FDA review before commercialization?

Mr. {Landa.} Yes, and we think that is happening now.

Mr. {Pompeo.} Right. Thank you.

I yield back, Mr. Chairman.

Mr. {Pitts.} Chair thanks the gentleman.

That concludes the questions of the members who are present. I am sure we will have follow-up questions, other questions from members. We will submit to those--those to you in writing. We ask that you please respond promptly. Thank you very much for coming this morning.

We are going to take, while the staff sets up the second panel, a 3-minute recess. The subcommittee is in recess.

[Recess]

Mr. {Pitts.} The subcommittee will come to order. We will ask our guests to please take their seats, and I will introduce the second panel at this time.

First of all, Dr. Alison Van Eenennaam, Cooperative

Extension Specialist in Animal Genomics and Biotechnology, Department of Animal Science, from the University of California Davis. Secondly, Mr. Scott Faber, Senior Vice President of Government Affairs for the Environmental Working Group. Representative Kate Webb, Assistant Majority Leader in the Vermont House of Representatives. Ms. Stacey Forshee, the Fifth District Director of the Kansas Farm Bureau. And finally, Mr. Tom Dempsey, President and CEO of the Snack Food Association.

Thank you all for coming. We appreciate your patience. You will each have 5 minutes to summarize your testimony. Your written testimony will be made a part of the record.

So, Dr. Van Eenennaam, I think is the way you pronounce your name, right? I am sorry for mispronunciation. We will start with you. You are recognized for 5 minutes for your summary.

^STATEMENTS OF ALISON VAN EENENNAAM, PH.D., COOPERATIVE EXTENSION SPECIALIST, ANIMAL GENOMICS AND BIOTECHNOLOGY, DEPARTMENT OF ANIMAL SCIENCE, UNIVERSITY OF CALIFORNIA, DAVIS; SCOTT FABER, SENIOR VICE PRESIDENT OF GOVERNMENT AFFAIRS, ENVIRONMENTAL WORKING GROUP; REPRESENTATIVE KATE WEBB, ASSISTANT MAJORITY LEADER, VERMONT HOUSE OF REPRESENTATIVES; STACEY FORSHEE, FIFTH DISTRICT DIRECTOR, KANSAS FARM BUREAU; AND TOM DEMPSEY, PRESIDENT AND CEO, SNACK FOOD ASSOCIATION

^STATEMENT OF ALISON VAN EENENNAAM, PH.D.

} Ms. {Van Eenennaam.} All right. Good morning, Mr. Chairman, and members of the subcommittee. My name is Alison Van Eenennaam, and I am a biotechnology and genomics cooperative extension specialist at the University of California in Davis, and I appreciate the opportunity to speak on this topic here today.

I work in the public sector as a scientist performing research and education on biotechnology, and one of the reasons I am testifying here today is that I was the taskforce chair and the lead author of the CAST Issue Paper number 54, entitled The Potential Impacts and--of Mandatory

Labeling for Genetically-Engineered Food in the United States, that was released in April of this year, and it is included as an attachment to this testimony. And it basically explores the scientific, legal and economic aspects of requiring food labeling in the United States, based on the use of a breeding method, that is, genetic engineering, rather than on some specific attribute of the food product itself. And it also looks at the implications of state versus national labeling laws, and the potential economic impacts, and so I think it is very germane to today's discussion.

As a scientist speaking here today, I do want to clarify that GE food, commonly, but less precisely, referred to as genetically-modified food, is food derived from crops produced using a breeding method, based on the movement of useful genes from one species into another using recombinant DNA technology. This method is used routinely in medicine, and many pharmaceuticals such as insulin and food processing aids, such as renin used in cheese production, have been made by GE microbes.

Although most commercialized crops that have been developed using GE thus far have been made to resist insects or herbicides, this breeding method can be used for many purposes. And public sector scientists in Hawaii and New

York, for example, use GE to produce a virus-resistant papaya, a papaya that virtually saved the Hawaiian papaya industry. Other introductions include drought-tolerant corn, virus-resistant squash, and consumer traits like a non-browning apple, a low-acrylamide potato, and crops that produce improved oils for nutrition.

Land grant university researches in California, Florida and Texas are working to use genetic engineering to develop oranges that are resistant to Citrus Greening Disease, something that is devastating the Florida orange industry, and grape varieties that are resistant to Pierce's Disease.

In New York, researchers are using a wheat gene to develop an American chestnut tree that is resistant to the imported chestnut blight. These disease-resistant GE applications focus on controlling disease with genetics rather than with chemicals, and importantly, they don't involve the use of chemical pesticides, an issue that often gets conflated with GE as a breeding method.

In 2013, genetically-engineered crops were cultivated worldwide by 18 million farmers, and in the United States, GE varieties were planted on 95 percent of sugar beet acreage, 93 percent of soy, and over 90 percent of both cotton and corn acreage.

What has been the impacts of this widespread adoption?

As a scientist, I look to the peer reviewed independent literature, especially meta-analyses and review articles that present a summary of many independent studies. In 2014, German university professors published a comprehensive analysis of 147 studies that have assessed the impact of the adoption of genetically-engineered crops. They found the benefits were significant and, in summary, on average, GE technology adoption reduced chemical pesticide use by 37 percent, increased crop yields by 22 percent, and increased farmer profits by 68 percent. This would explain their widespread adoption by farmers globally.

As a result of this widespread use in American agriculture, many food products in the United States include ingredients that might be from corn oil or sugar beet--sugar that have been derived from GE crop varieties. And it has been said before, it has been estimated 80--70 to 80 percent of processed foods likely contain such ingredients.

Importantly, many highly-processed ingredients, such as sugar and oil, contain no detectable traces of DNA or protein, and hence, there is no way to test these refined products to determine their genetic origin; meaning, labeling of these products would require entire supply chain tracking and segregation to keep track of the products derived from genetically-engineered crops, a very expensive and

complicated proposition.

There is a broad scientific consensus about the safety of food produced from GE crop varieties, and solid data to support that consensus. A 2013 review article, written by independent Italian public sector scientists, reviewed over 1,700 safety records of GE crop safety published this past decade, and concluded that the scientific research conducted so far has not detected any significant hazards directly connected with the use of GE crops.

The American Association for the Advancement of Science, the world's largest and most prestigious scientific society, stated in 2012 the science is quite clear; crop improvement by the modern molecular techniques of biotechnology is safe. The World Health Organization, the American Medical Association, the U.S. National Academy of Sciences, the British Royal Society, and every other major scientific body and regulatory agency in the world that has examined the evidence has come to the same conclusion.

To date, no material differences in composition or safety of commercialized crops developing used [sic] GE has been identified that would justify a label based on the use of GE as a breeding method in the development of that crop variety. While this conclusion will not satisfy those who consider the insertion or manipulation of genes in a

laboratory a material difference, per se, the science of food safety does not support mandatory process-based labeling of GE food and, by extension, is not required by the Food and Drug Administration.

Thank you for the opportunity to speak here this morning, and I would be pleased to take questions from the subcommittee.

[The prepared statement of Ms. Van Eenennaam follows:]

********** INSERT B **********

Mr. {Pitts.} The chair thanks the gentlelady.

Now recognize Mr. Faber 5 minutes for his opening statement.

^STATEMENT OF SCOTT FABER

} Mr. {Faber.} Thank you, Mr. Chairman. Mr. Chairman, Ranking Member Pallone, members of the committee, thank you for the opportunity to testify. First, let me thank you for the tremendous work you and your staff performed on the Sunscreen Innovation Act. We greatly appreciate your work on that important piece of legislation. And let me thank you for dedicating your time to this important issue. As you can tell, people are incredibly passionate about their food.

Consumers simply want the right to know what is in their food and how it is produced. More than 90 percent of consumers, regardless of age, gender, income, or even party affiliation, routinely tell pollsters that they want--simply want the right to choose the right to know what is in their food. But this isn't simply a question of right to know. It is also a question of consumer confusion. As Mrs. Capps mentioned earlier, misleading claims like natural claims have led to significant consumer confusion. Roughly 60 percent of consumers, when buying a package with a natural claim, believe that natural foods--all natural foods are GMO-free. And we believe that a factual, informative, nonjudgmental disclosure on the back of the package would help address this

confusion.

Now, let me be very, very clear. We are not seeking a warning of any kind; we are simply seeking a factual, nonjudgmental disclosure on the back of the package, and we are confident, as Mr. Pallone suggested earlier, that food companies, farmers, FDA, consumer groups can work together to craft a disclosure that provides consumers basic information without rendering a judgment on the technology.

And fortunately, FDA has the authority to require such a disclosure, and as Mr. Waxman alluded to earlier, has used this authority in the past. And that is fortunate because we would greatly, greatly prefer a national GMO labeling solution. But in the absence of leadership from FDA, we believe that states should and can act or require a mandatory disclosure. Congress has long recognized a role for the states, a leading role for the states, in food labeling, and that is why the NLEA was carefully crafted to not preempt state labeling laws, such as the GMO disclosure laws that have been passed by states like Vermont.

Now, you have certainly heard arguments made today, and will hear more arguments made by this panel, that GMO labeling will increase food prices, but you don't have to work for the Grocery Manufacturers Association or work for the food industry to know that food companies change their

labels all the time to highlight new claims or new innovations.

You will also hear today that GMO labeling will create costly new farm and food--the need for costly new farm and food segregation systems, but those systems have been in place for decades, to address allergens and to meet growing demand for non-GMO and organic choices, all the way from the farm to the elevator, to the processor, to the retailer. In fact, the snack food industry has launched more non-GMO project offerings in the last decade than any other segment of the food industry.

You will also hear--and also have heard, and will hear again, that we need GMO crops to feed the world. First, let me say, no one, no one is seeking a ban on GMO crops, and let me point out also that many farm groups, including the National Farmers Union, support mandatory GMO labeling. But it is also worth noting that we have run the experiment for the last 20 years, and so far yields of conventional crops have kept pace with yields of GE crops.

Now, I agree with testimony you will hear from Ms. Forshee that farmers should have choices, but so should consumers. We need a national GMO labeling system that works for farmers, that works for food companies, but that also works for consumers. Unfortunately, H.R. 4432 does not

provide a national mandatory labeling system. In fact, H.R. 4432 narrows FDA's ability to work with us, to work with farmers, to work with the food industry to craft such a system. It fails to restrict the misleading natural claims that have fueled so much consumer confusion, and it preempts state laws that are ultimately designed to protect consumers from this confusion.

Mr. Chairman, people simply want to know what is in their food, they want to be able to make choices for their families, and I hope that you will work with us to give consumers the right to know whether or not their food contains genetically-modified food ingredients.

Thank you.

[The prepared statement of Mr. Faber follows:]

********** INSERT C **********

Mr. {Pitts.} The chair thanks the gentleman.

Now recognize Representative Webb 5 minutes for opening statement.

^STATEMENT OF KATE WEBB

} Ms. {Webb.} Thank you, Mr. Chair, and committee. My name is Kate Webb. I am a Representative and Assistant Majority Leader from the good state of Vermont, and I was the lead sponsor on Act 120, a law that simply gives consumers the right to know if the food they purchase in Vermont is genetically engineered. The law is at risk should H.R. 4322 become law. Because Vermont is involved in litigation regarding this very issue, I want to be clear that I am not a lawyer, not a scientist, and not here as a representative of my state or my government. I am here as a Vermont citizen to tell you of the importance of this right to the citizens of my state, and other states whose citizens seek this simple request for transparency.

Vermont's Act 120, an act relating to the labeling of foods produced with genetic engineering, was signed into law this May to great fanfare and celebration on our State House steps. This Bill grew from grassroot efforts of tens of thousands of Vermonters seeking to have a right to make an informed choice about the food they purchase. This desire was not limited to a handful of Vermonters. Survey upon survey has shown that more than 75 percent of Vermonters were

in favor of such labeling.

I personally became involved in this legislation in 2012, and over the next 3 years, we developed draft legislation to gain the fundamental right to know how our food is produced; drafts that traveled through six legislative committees who received testimony from over 100 people, including scientists, lawyers, academics, consumers, manufacturers, and food producers on both sides of the issue. Act 120, in its final form, is the result of many hours, weeks and years of work, and it passed the Senate, I want you to hear this, the Senate on a vote of 28 to 2. It passed the House on a vote of 114 to 30. These are large numbers.

Why is it that Vermont wants this right? It is about transparency and truth in labeling. Even though the World Health Organization defines genetically-modified food as foods derived from organisms whose genetic material has been modified in a way that does not occur naturally. And Monsanto defines genetically-engineered organisms as plants or animals that have had their genetic makeup altered to exhibit traits that are not naturally theirs. However, many genetically-engineered products continue to carry the word natural, or variations of this word, on their labels. I believe this is misleading, and Act 120 would prohibit the use of this term for products produced or partially produced

with genetic engineering.

Because GE is a relatively new and evolving science, consumers concerned about unintentional environmental and health effects want the right to exercise this precaution.

And finally, we heard testimony that without labeling, members of many religious communities could not tell if products they purchased violated their faith's dietary prohibitions. There is nothing in our law that restricts anyone from producing or selling genetically-engineered products. There is nothing in our law that says that it is good or bad. Business and farming will go on as business and farming does.

One of the great strengths of a capitalist democracy is not only do we cast a vote at the polls, we also do by--so by selecting the products we purchase. Transparency allows us to see how things work, be it government, financial institutions or the food we eat. This transparency allows us to make informed decisions, and ultimately build trust.

States have historically, and continue today, to lead the way on food labeling. Forty-one states regulated the use of sell-by and use-by data on--dates on food labels. Before Congress mandated our current federal county of origin--country of origin label, which also doesn't state whether it is good or bad, nor does our Bill, these requirements existed

in Alabama, Mississippi and Arkansas, who required labeling disclosure about the source and production of catfish. And many states regulate the labeling of cottage foods. I believe Tennessee and Mississippi do this. And many states are already regulating the labeling of bottled water before the FDA set standards of identity.

While the USDA and AMS issue voluntary grading standards for some agricultural products, many states also issue these grading labels. Vermont's legislature did so with maple syrup this year.

Mr. Chairman, our state is already involved in litigation with the Grocery Manufacturers Association, among others, and if this will help to answer if Vermont and any other state has the constitutional right to label.

I urge you to defeat H.R. 4432 and promote federal labeling. Thank you.

[The prepared statement of Ms. Webb follows:]

********** INSERT D **********

Mr. {Pitts.} Chair thanks the gentlelady.

Ms. Forshee, you are recognized 5 minutes for your opening statement.

^STATEMENT OF STACEY FORSHEE

} Ms. {Forshee.} Chairman Pitts and Ranking Member Pallone, and all the other committee members, it is an honor and privilege to sit in front of you today. My name is Stacey Forshee. My husband, David, and I are fifth generations to farm in Cloud County, Kansas, in north central Kansas. We live in--near the small community of Delphos, and just to put it in perspective, I am 20 miles away from my nearest grocery store.

I am a member of the Cloud County Farm Bureau Association. I serve on the Board of Directors for Kansas Farm Bureau for a 10-county area. I am also a part of the Cloud County Community College Ag Advisory Board, CloudCorp Board of Directors, and I also sit on my Concordia High School Booster Club Board. But my most important job is to wife of my husband, David, for 24 years, who I farm right alongside, as well as my--our children, Kendra, Lauren and Wyatt. But, you know, raising our children on our farm hasn't always exactly been easy, but we are very proud of what we have accomplished.

Today, we farm approximately 2,000 acres that we grow corn, soybeans, alfalfa, wheat and other feed crops for our

cattle. We operate a feed cow calf operation that has about 700 cows, that my husband is homing--home finishing calving for me right now, and then--but the majority of them will calf in the spring.

We also operate a small feed lot that enables us to feed our own cattle, and actually, much of what we grow, sometimes we are able to feed them. We also custom feed other producers' cattle. We have a custom hay-grinding operation where we grind area cattlemen's hay for them, and we also buy and sell quality alfalfa to--and we have supplied dairies and feedlots throughout Kansas.

But first, and most importantly, I am a mom and I am a consumer, and so--and a farmer, so I would never want my children to eat anything, or anybody else's children to consume something that was bad for them, that was unsafe. And as a farmer, my family would never want anything to enter the food supply that we raised or that we grew that would be proven to be unsafe. And there has been, you know, very many--all the credible studies have shown that genetically-modified ingredients and products are safe.

On our farm, we use this biotechnology to be able to conserve moisture. We also have found that by using this technology, we can--up to 40 percent we can save on fuel, on fertilizer and on pesticides. We have seen that drop over

the last 24 years. We also, you know, we are stewards of the land. The environment is very important to us, so the less we use of all of these things are very important, and we owe that to biotechnology.

Labeling a safe product, to me as a consumer, just does not make any sense. So I just feel that this--and, you know, making a mandatory label is going to mislead consumers into thinking that it is unsafe, which we have heard today that that is wrong.

With the future projections of our growing world, farmers and ranchers around the world are going to have to double their food production to meet those growing demands, and on my farm, biotechnology is a way that we feel like this--we can make this happen.

On our farm, we also have the ability to store more than 20,000 bushels of grain. So when we harvest our crops, we store that grain on--in different bins. I mean due to crop insurance regulations, there are certain things that we need to abide by, but it--we--but we can store all one kind of grain in one bin. And the same is true for my local elevators and all our rural communities. For us, we do this so that we can market that crop later, or feed it to our livestock, but it would cost billions of dollars in order--in infrastructure and new technology to be able to just

absolutely trace a biological trait from my farm to the consumer's table.

As a mother and a farmer, I urge Congress to pass this H.R. 4432, the Safe and Accurate Food Labeling Act. To--for me to be able to continue to farm like I do, and to meet the growing future's needs, I really urge you to do this.

And I really thank you for your time.

[The prepared statement of Ms. Forshee follows:]

********** INSERT E **********

Mr. {Pitts.} Chair thanks the gentlelady, and now recognizes Mr. Dempsey 5 minutes for your opening statement.

^STATEMENT OF TOM DEMPSEY

} Mr. {Dempsey.} Thank you. First, I would like to thank the subcommittee, Chairman Pitts and Ranking Member Pallone, for holding this hearing to provide a balanced review of one of the most critical issues facing the food industry today, the labeling of genetically-modified organisms, or GMOs.

My name is Tom Dempsey. I have served as the President and Chief Executive Officer of the Snack Food Association, the SFA, since 2013. Prior to joining SFA, I was the President of one of the largest privately owned snack food brands in the United States.

Today at SFA, I represent over 400 companies who produce snacks ranging from potato chips to granola bars. My members include both billion dollar, multi-category companies, and small, family-owned businesses in the second and third generation of management. More than half of SFA members have sales of less than $100 million a year, and many are the primary employers in their community.

While voters have rejected ballot initiatives calling for mandatory GMO labeling in 4 stats, the state of Vermont recently approved the Nation's first mandatory labeling law. Mandatory GMO labeling at the state level would impact nearly

every aspect of my members' business, upping costs by requiring increased product inventory, added complexity for packaging and distribution processes, and extensive new regulatory and training requirements.

Absent a federal solution, manufacturers will have essentially three options to comply with a state GMO: redesign their packaging, reformulate products so that no labeling is required, or halt sales to that state. Each option is difficult, costly, time-intensive, and at worst, could eliminate jobs and consumer choice in the marketplace. Smaller companies may not have these options at all. A patchwork of GMO labeling laws would pose significant burdens on the manufacturing process itself. They would require separate storage for GMO and non-GMO products throughout the entire supply chain, beginning with the farmer, and extending through various states of production and distribution. Aside from new administrative and recordkeeping burdens, snack makers will be forced to clean and boil the sheeting, baking, frying and seasoning lines between GMO and non-GMO production to ensure there is no contamination. This could take up to 2 hours, and would lead into a loss in valuable production time. Duplicative food labeling for the same stock keeping unit, or SKU, assigned to each product line is also a problem. Film, which is our industry's term for snack

packaging, would need to be changed mid-production, and 2 separate inventories of the same finished product must be kept. Significant lead times and costs would go into bag changes. The cost in plate charges, new film, administrative oversight could be more than $750,000 for 800 SKUs, and the process could take 20 to 26 weeks.

GMO and non-GMO products must continue to be segregated from the factory to the grocery store, resulting in increased distribution costs and heightened opportunity for mistakes.

To be clear, the hardest hit by this will be the one plant operators with a single line of production. These costs could put family-owned businesses out of business, thereby increasing consolidation in the industry. While it is sometime assumed--sometimes assumed that companies could remove the GMO ingredients from their products, this is unrealistic because the availability of non-GMO crops is limited. Over 80 percent, although I heard today 90 percent, of the corn, cotton and soybean crops in the United States are produced with biotechnology, all products which are staple items in the snack production. Our members will not have the opportunity to increase their contract with farmers or mills for non-GMO corn for a minimum of 2 years. Transitioning to GMO-free production will not happen overnight.

Some manufacturers may choose to end distribution in states that require GMO labeling, resulting in fewer product options for consumers, and causing a ripple effect in the grocery industry. Even if manufacturers notify grocers of their intent to stop selling in a state, manufacturers could run the risk of being fined if retailers do not comply or if mistakes happen in the distribution process. Fewer players in the aisle could mean less incentive to keep quality high and prices low. Fewer products could disproportionately cause job losses for some in the distribution chain. Ultimately, a patchwork of state GMO laws will hit consumers the hardest, and would result in either increased costs at the grocery store, or less availability of products in their stores.

In addition, it is important to note that consumers already have options to purchase non-GMO foods, and these options continue to expand. For over a decade, both the USDA's natural organic program and the independent non-GMO project have certified foods that are organic and GMO-free respectively. The process to gain these certification seals is not only rigorous but expensive. Many SFA members have already made the significant investment to display these voluntary labels. Forcing companies to re-label more than 80 percent of the products does nothing but add cost, confusion

and may limit choices to consumers.

SFA does not have a single member company that manufactures, distributes and sells in just one state, which makes state labeling law incredibly complex. Multiply these challenges by 5, 10 or even 25 states, and an insurmountable burden is placed on the supply chain. SFA supports the Safe and Accurate Food Labeling Act, which eliminates the proposed patchwork of state laws by creating one federal GMO standard, and provides much-needed consistency for manufacturers and consumers alike.

Thank you for your time.

[The prepared statement of Mr. Dempsey follows:]

********** INSERT F **********

Mr. {Pitts.} Chair thanks all of our witnesses for your testimony.

I will begin the questioning. Recognize myself 5 minutes for that purpose.

Dr. Van Eenennaam, is there currently a lack of consensus about the validity of research and science behind the safety of foods and ingredients derived from genetically-engineered crops?

Ms. {Van Eenennaam.} Well, as I stated in my testimony, there is clear consensus amongst all of the leading scientific organizations throughout the world, and the meta-analysis of over 1,700 studies, about 1/3 of which are done by the public sector that do not have any industry funding, somewhere in that vicinity, have all come to the same conclusion that there are no unique risks posed by the use of this particular breeding method in the production of genetically-engineered crops.

Consensus doesn't mean unanimity, so there are scientists that you will hear that say that that is not true, but to your question earlier, it is as strong of a consensus, it is probably stronger than on global warming, it is 99 to 1, or something in that vicinity. And I think if you get consensus of all of the major scientific societies in the

world, then that is a pretty strong consensus.

Mr. {Pitts.} The first generation of biotechnology products has brought tremendous benefits to farmers, as we have heard. What do you see as the potential for a consumer facing benefits of the next generation of biotechnology products?

Ms. {Van Eenennaam.} So certainly, and I might argue the consumer has had some benefit from the first generation also because of the decreased insecticide use associated with Bt crops, for example, has knock on benefits for the environment and the consumer, and also costs. But there are direct benefit traits being developed for consumers. For example, altered nutritional profiles of crops for improved human health, and particularly in developing nations, there are efforts to bio-fortify crops to improve the nutritional profile of staple crops of the world's poor to improve their nutrition. And so there is a huge interest amongst public sector scientists and also public-private partnerships to try to use this technology to improve foodstuffs and improve the nutritional composition of crops for both developed and developing countries.

Mr. {Pitts.} As a scientist, could you put in laymen's terms, you said this requires use of less pesticides. How does that occur, how do they make that occur?

Ms. {Van Eenennaam.} Well, for example, the insect-protected crops have a protein in them that basically targets Lepidoptera caterpillars so that they are--when they eat the crop, they perish, but it is safe for humans. And so it basically enables farmers not to have to put insecticide on that crop. And so, for example, especially in the developing world, there has been a dramatic production in insecticides, over 1/2--they have doubled--decreased their insecticide use by over 1/2, and they have doubled their yields as a result of protecting the crops from the insects, and not having to use more dangerous insecticides to protect those crops. And so it is kind of breeding the crop to be protected from insects and, therefore, you can decrease your insecticide use.

And even in the U.S., it has decreased the use of insecticides on Bt corn over tenfold since the adoption of this technology.

Mr. {Pitts.} Thank you.

Mr. Faber, how would you describe or define natural?

Mr. {Faber.} Yeah, that is a great question, Mr. Chairman. I think commonsense definition of natural for an ordinary consumer would not include genetically-modified ingredients. In fact, one of the major providers of the technology, Monsanto, itself does not define biotech traits

to be something that should be described by natural. And I think that is--you are getting it right at the heart of the matter, which is that consumers go to the store, they see an all-natural or natural disclosure, and roughly 60 percent, depending on its study, 58 percent, 64 percent in others, believe that that food is GMO-free.

What is important here is that we want consumers to be using their buying power to shape their lives and the world around them. If they are confused about what they are buying, they are not able to use their buying power to really make good, informed choices.

Mr. {Pitts.} Thank you.

Representative Webb, when would your law become effective? Is it effective now?

Ms. {Webb.} We are involved in rulemaking now. Rules should be out July 2015 and in effect July 2016.

Mr. {Pitts.} All right. Ms. Forshee or Mr. Dempsey, how would this labeling requirement affect your snack food companies if they did not wish to comply?

Mr. {Dempsey.} Well, as I said, there are three options. They can reformulate, they could label, or they could cease sales within Vermont. And I think each individual company is going to have to make that decision based upon the number of businesses and SKUs that have to be

relabeled.

Mr. {Pitts.} And finally, Ms. Forshee, how would--or has biotechnology impacted the way you farm, say, in the past decade?

Ms. {Forshee.} Well, I would say that we are able--with that kind of technology, we are able to use a practice of no-till which allows us to conserve moisture and, you know, not spray the crops, you know, nearly as much as--I mean there is a whole notion of--that farmers just dump pesticides and herbicides on their crops, but we don't. I mean it is a--it is very costly to do that kind of an application, spray any kind of an application, and so we are very, you know, I mean it is just--it is very--what I want to say, we use GPS to do that so that there is just the right amount put on the crop and no more. And so the less we can do that, the more it is going to help our bottom dollar too for yield. So we have seen higher yields as well on our farm in the last, you know, 24 years--

Mr. {Pitts.} And with--

Ms. {Forshee.} --as a result of that.

Mr. {Pitts.} With no-till, less run-off--water run-off?

Ms. {Forshee.} That is correct. As long--and also though the, you know, the biotechnology traits in our crops, it all comes together as one.

Mr. {Pitts.} Thank you. My time has expired.

The chair recognizes the ranking member, Mr. Pallone, 5 minutes for questions.

Mr. {Pallone.} Thank you, Mr. Chairman.

Mr. Faber and Representative Webb, you both believe that industry should be required to label all foods that contain GE ingredients, and you both also characterize such labeling requirements as a modest disclosure or a simple request. And, Mr. Faber, you also state that food companies frequently change their labels to make new claims or to highlight new innovations. And I think an accurate summary of your position on this is that it simply is not a big deal for companies who use GE ingredients to label their products as such. Now, Mr. Dempsey, on the other hand, makes the argument that mandatory labeling for GE foods would dramatically increase the cost of the food because it would require manufacturers to segregate the food or use multiple labeling films, a number of things.

You know, I guess in my view, on the one hand, if it is truly not that burdensome for industry to label their food, then why shouldn't they be required to do so. On the other hand, if the labeling requirement could result in higher food costs, you know, maybe that is not a risk that we want to take.

So let me just ask you these questions in light of that. First, Mr. Faber or Representative Webb, can you elaborate on why you believe a mandatory labeling requirement to--is simple for industry, and how do you respond to the assertion by Mr. Dempsey and others in industry that complying with that requirement would be an elaborate and expensive prospect? Briefly if you can--

Mr. {Faber.} Right.

Mr. {Pallone.} --because I want to ask him a question too.

Mr. {Faber.} Absolutely. So very briefly, so there essentially--we have heard reference from Mr. Pompeo and Mr. Butterfield to this $500 cost associated with food labeling. That--those--that study assumes two things, and one thing in particular is that it--that disclosure would ultimately equal disparagement, that consumers would see a disclosure, they would stop eating food made with genetically-modified food ingredients, and that would cause costly supply change disruptions or force consumers to buy organic. What we know about how consumers use labels is they tend to look for certain attributes. You may look for fiber, I may look for calories. We tend not to read the whole package. We use that information to make particular decisions about our food choices. So the notion that consumers--American consumers

are going to broadly reject foods with a modest, nonjudgmental disclosure I think is unfounded. We know that in part because we have labeling in 64 other countries, including countries like Brazil, where there has been a disclosure for--since 2001, and consumers more or less eat the way they have for the last 13 years. So I think we can all be confident that if we craft the disclosure in the right way, to your earlier point, Mr. Pallone, that we can give consumers information without rendering a judgment that ultimately leads to significant changes in buying behavior.

The other thing I will just quickly say again is that, you know, companies are already finding ways to make both non-GMO and GMO foods. We have segregation throughout the supply chain. We preserve identity of these grains throughout the supply chain, in part because the marketing needs, but also because of quality and allergen needs. So there are already--there is already an infrastructure in place that allows us to segregate non-GMO and GMO, and other kinds of grains and oils.

Mr. {Pallone.} All right. I am going to go to Mr. Dempsey now because I want to--you to respond to those claims and, you know, specifically respond to the assertion that food companies, you know, they are changing their labels so they can easily do this. What do you--how do you respond to

what--

Mr. {Dempsey.} Well--

Mr. {Pallone.} --Mr. Faber was saying?

Mr. {Dempsey.} --certainly, food companies change their labels but not on a wholesale banner, and do all of them all at the same time. So you run into a big situation of X number of SKUs that have to be done all at the same time to comply with a law that goes into effect in 2016. Small businesses would be hit very hard because of that. They have historically been ones who change their labels very seldomly. And in central Pennsylvania, I can probably think of five or six companies that are using the same graphics, same bags that they have had for many years; the only changes, those being mandated by the FDA. So I think the real burden comes on the small family-owned, small operators who have SKUs that are genetically modified and have to label them, and rather than using the--what the market has now, and that is the option of a non-GMO or GMO-free certification, to notify and give consumers transparency, which does the--gives the manufacturer the option of doing it.

Mr. {Faber.} Can I add just one quick thing?

Mr. {Pallone.} Well, maybe I will ask Representative Webb, we have 40 minutes--40 seconds--

Ms. {Webb.} Yes.

Mr. {Pallone.} --if you want to say something.

Ms. {Webb.} I would say that we are in rulemaking process now. We have manufacturers that are weighing in on how that label will be written. We are hoping that our labeling will be something that other states can use. The standards between Maine, Connecticut and Vermont, the legislation is similar. We are also a small state. We have 630,000 people in our entire state. People already drive to New Hampshire to avoid the sales tax, so if the industry chooses not to sell in Vermont, I am sure that we can get our Doritos over the town--over the state lines.

Mr. {Pallone.} All right.

Mr. {Faber.} And I would like just to add, that not only do companies change their packaging all the time, the average lifespan of a label is about a year, we ask companies to change their disclosures. We ask them to change them for trans fat, we ask them to change them for allergen labeling, so--and we are about to ask them to change their labels as part of a refresh of the nutrition facts panel. So there are periods in the history of labeling where we ask companies to disclose a little bit more about what is in the food. This is the perfect time, since we are in the midst of an NFP rulemaking, to think about how can we make this disclosure in a way that is nonjudgmental.

Mr. {Pallone.} Thank you.

Mr. {Pitts.} Chair thanks the gentleman.

Now recognize the gentleman from Virginia, Mr. Griffith, 5 minutes for questions.

Mr. {Griffith.} Well, and I would have to say that from listening to the testimony today, that I am convinced we have to have a national policy. And we can argue, Representative Webb, about what that policy ought to be, and, Mr. Farber--Faber, we can argue about what that policy ought to be but I think it needs to be national. It may be relatively easy for Vermonters to cross the stateliness to get their Doritos, but I would have to submit that in parts of my district, and I represent the southwestern portion of Virginia, the Allegheny Highlands of Virginia, and Southside Virginia. It is a large district, it may be larger than Vermont, certainly has more people in it, but there are parts of that where, if you wanted to go and get some other product, you would have to drive several hours. There are other parts where you just walk across the street, and so if you had a grocer on one side of the street, and you looked at the labeling in that state and said--on Tennessee on State Street, and you said, I don't know about this genetic engineering, and you walk across the street, it might be the very same product but it might not have that label on in Virginia. So I am convinced

we have to have a national label.

And just a few miles up the road from State Street, where you literally are on the main street of the town, and you are one state on one side and on the other--in another state on the other side of the street, is probably one of your members, Mr. Dempsey, Shearer Foods has a potato chip facility there and they obviously ship to a number of states from that Bristol, Virginia, plant.

Mr. {Dempsey.} That is correct.

Mr. {Griffith.} And so that concerns me that they would have to have different labels for all the states that they operate in, but I am particular concerned about if we don't have a national policy, concerned that the consumer gets confused into what is it I am buying. Well, if I buy it in Virginia, it is a different product than what I am buying in Tennessee. I don't know whether you have any towns like that in Vermont that are--that straddle the state line, but I have a number of them. Bristol, Virginia/Tennessee, Bluefield, Virginia/West Virginia, the Martinsville area has, you know, towns if you didn't know where you were, you would be out of Henry County and into North Carolina in a heartbeat traveling down 220. And so we--I think we have to be very, very concerned about that, and I do think it is important.

And then the other thing is your rulemaking process, I

know your Attorney General is in charge of that, but what experience does Vermont have, Representative Webb, in food labeling? I mean is this something that they have done before in some kind of a large way, and what are they doing in that process to try to label these foods?

Ms. {Webb.} Well, as I previously stated, we did make some changes to our maple syrup labeling.

Mr. {Pitts.} Can you poke your--

Ms. {Webb.} I am not on?

Mr. {Pitts.} Yeah.

Mr. {Griffith.} Yeah. You did say that about maple syrup, and what was the difference? I just assumed it was a parochial difference.

Ms. {Webb.} Our labeling--excuse me, sorry. Our labeling had been grade A, grade B. We chose to go with the standards that they are using in Quebec because they are a larger producer than our brave little state.

Mr. {Griffith.} And grade A, grade B, what do they use in Quebec?

Ms. {Webb.} Goodness. I am not--

Mr. {Griffith.} Because I have to tell you the truth--

Ms. {Webb.} Yeah.

Mr. {Griffith.} --my wife disagrees with me--

Ms. {Webb.} Total difference.

Mr. {Griffith.} --I can't tell the difference between A and B--

Ms. {Webb.} Yeah.

Mr. {Griffith.} --so I always buy B because it is cheaper.

Ms. {Webb.} Yeah. I like B too.

Mr. {Griffith.} Yeah. But what is the Quebec standard so I will know what I am looking at when I go to--

Ms. {Webb.} I--

Mr. {Griffith.} --the store?

Ms. {Webb.} I would have to look it up.

Mr. {Griffith.} You would have to look it up. All right, I appreciate that. That was--

Ms. {Webb.} We just recently--

Mr. {Griffith.} That was not fair to ask you today anyway--

Ms. {Webb.} Yeah.

Mr. {Griffith.} --I apologize. You know, I do think it is complicated, and I would ask folks who are here today, or who are watching at home, if you have suggestions that--on how you might make some reasonable changes to Mr. Pompeo's Bill, he may or may not accept them, but I would ask that you submit those to the committee so that we can take a look at those changes because I am convinced we have to have a

national standard. And I would like to know, if I am buying something that is labeled natural, and I do that on a fairly regular basis, I would like to know that there is something standard about it, and so I would like to see us move in that direction as well.

Mr. {Faber.} And, Mr. Griffith, we would be thrilled to work with you and with our colleagues in the food industry, and to craft a national disclosure that is mandatory, that works for the consumer, but that also works for food manufacturers who have to operate in 50 states, I think if people of goodwill could find a way to develop a disclosure that is truly nonjudgmental, and I would welcome the opportunity to do that.

Mr. {Griffith.} Well, and I appreciate that. I will tell you that in thinking about this over the years, as you may have heard earlier, I do read labels fairly carefully--

Mr. {Faber.} Yes, I know.

Mr. {Griffith.} --and I am convinced now that genetically-modified or genetically-engineered foods are so prevalent that we probably need to go the other way, and for those of us that may want to purchase something, that the labeling requirement ought to be on those who can certify that their food is, in fact, not--does not have this product in it, as opposed to the reverse.

Mr. {Faber.} That is right. And you and I may agree or disagree about whether or not there are more herbicides or fewer herbicides, or--I think the bottom line here is that consumers want to be able to make those choices themselves. And it ultimately boils down not just to an issue of transparency, but an issue of trust. If we give parents, consumers the basic information, we should trust them to do their homework and make those choices for themselves.

Mr. {Griffith.} I appreciate that.

And with that, Mr. Chairman, I see my time is up and yield back.

Mr. {Pitts.} The chair thanks the gentleman.

Now recognize the gentlelady from California, Mrs. Capps, 5 minutes for questions.

Mrs. {Capps.} Thank you very much, Mr. Chairman. And to our witnesses, thank you for being at this hearing and your testimony.

I think we are finding ourselves in general agreement that a good federal standard for GE labeling is preferable to a confusing patchwork of state labeling rules, which it appears that we have today, but there still is disagreement about what exactly that standard should be. I want to be clear, I don't believe this is even a debate about whether or not GE foods are safe, it is a debate about whether or not

consumers have the right to know what is in their food, and I think I am just echoing what some of you just have said. I firmly believe that consumers do have the right to make informed decisions about the food they eat, and I believe we pretty much all agree on this point.

Just to get it on the record, however, I--what about now a simple yes or no question so we can get this on the record. And I will start with Dr. Van Eenennaam, and one--right down the line, yes or no, do you think consumers should have the right to know what is in their food?

Ms. {Van Eenennaam.} I can't give you a yes-or-no answer to that.

Mrs. {Capps.} You can't say yes or no?

Ms. {Van Eenennaam.} No, because I don't think the labeling is about what is in the food, it is about the process used to make the food, and that is a really subtle difference.

Mrs. {Capps.} I hear you.

Ms. {Van Eenennaam.} So sugar from genetically-engineered sugar beet is the same as sugar from non-genetically-engineered sugar cane sugar.

Mrs. {Capps.} All right, I wanted to go faster than that, but we will give you--

Ms. {Van Eenennaam.} Well, I mean because I think we

are not discussing about what is--a label of what is in the food--

Mrs. {Capps.} But--

Ms. {Van Eenennaam.} --we are talking about a label of how it was produced.

Mrs. {Capps.} Well, I think that could be under the umbrella, but that, yes, we do need to do this and we also need to talk about how to do it and what should be in it. But I will just go right along.

Mr. {Faber.} Yeah, of course consumers should have the right to know what is in their food.

Mrs. {Capps.} Yes.

Ms. {Webb.} Absolutely.

Ms. {Forshee.} Yes.

Mr. {Dempsey.} It depends on what--how easy it is to give them the right to know. I mean I think that is a too simple--a yes/no is too simple of a response.

Mrs. {Capps.} All right, I got an answer. Unfortunately, consumers currently do not have access to all the information they are looking for when it comes to GE foods, and consumers are often confused by--further confused, confused enough by not knowing what is in it, and then confused by what the information that they find on the packaging.

So I will now zero-in on you, Mr. Faber. Why do you think there is currently so much consumer confusion when it comes to GE labels?

Mr. {Faber.} Well, consumers have been deluged with misleading claims for many, many years, especially claims like natural. They perceive those claims, natural, all-natural, to mean something that they don't. They perceive those claims to mean GMO-free, and that is--and they are using their buying power in a way that they think is improving the world around them, when it is actually not.

Mrs. {Capps.} And it is not. So you agree that the current voluntary system is not working?

Mr. {Faber.} And the voluntary system isn't serving consumers and codifying the voluntary system as H.R. 4432 would just continue to create more and more consumer confusion.

Mrs. {Capps.} That was my next question, so I can just let you underscore it again. One of the arguments in favor of H.R. 4432 is that it will reduce this confusion. You disagree?

Mr. {Faber.} We strongly disagree. I think if we lived in a world where consumers perfectly understood what natural, non-GMO, organic and other claims meant, then a voluntary system might make sense, but we don't live in that world.

Mrs. {Capps.} Right.

Mr. {Faber.} We live in a world where consumers are extraordinarily confused about what they are buying at the point of sale.

Mrs. {Capps.} Well, I think we would also agree that this is certainly a complicated topic, and any labeling system must be implemented carefully and in close consultation with the industry, with--actually with all the stakeholders, but the current system, I believe and I think there is some agreement here, is not working for consumers. So I am concerned that the Bill we have before us, I guess I agree with you, Mr. Faber, that it just largely codifies the inadequate rules that we now have.

But I have 50 seconds left to ask you, and you agree that consumers are making decisions with their wallets, and they choose to avoid GE products, not because of food safety concerns, I want to bring up and let you respond to, but because of their environmental impact as well. So that is a further aspect, at least for many of my constituents. What are some of the environmental concerns that consumers are now having with the GE crops?

Mr. {Faber.} Thank you. Thank you, Mrs. Capps. There are many reasons that people want the right to know what is in their food. One is that the widespread adoption of GE

corn and GE soybeans in the U.S. has increased the amount of herbicides that we use, and as those herbicides have become less effective due to weed resistance, has forced farmers to turn to even more toxic herbicides like 2.4-D--

Mrs. {Capps.} I got you.

Mr. {Faber.} --mentioned by Ms. Schakowsky earlier.

Mrs. {Capps.} And so, again, you think consumers should be able to take this kind of information into account as well when making food choices?

Mr. {Faber.} Consumers overwhelmingly tell you, tell us, tell consumer attitudes experts, they simply want to have that information so they can make those choices for themselves.

Mrs. {Capps.} Thank you very much.

I yield back.

Mr. {Pitts.} Chair thanks the gentlelady.

Now recognize the gentleman from Florida, Mr. Bilirakis, 5 minutes for questions.

Mr. {Bilirakis.} Thank you, Mr. Chairman, I appreciate it so very much, and thank you for holding this hearing.

I have a couple of questions. Dr. Eenennaam, can you describe the current issue with Citrus Greening, affecting orange trees throughout the country? What is the role of GM technology in helping to fight this devastating disease?

Ms. {Van Eenennaam.} Well, as--Florida industry in particular is being hit by this particular disease, and there is--as plant breeders looking for options as to how we might go about trying to solve the issue, and there are several land grant universities, I am aware of Florida and Texas and California, all looking at both conventional breeding if that is an option, but also genetic engineering options. And I think that is the power of the technology is you can bring in a gene from another species to enable those trees to be resistant to the Citrus Greening Disease, and that is really, I think, the opportunity that exists to utilize this technology to develop disease-resistant plants that are able to withstand devastating diseases like Citrus Greening Disease or Pierce's Disease. And I think many public sector scientists see this as a real opportunity to develop plants that are healthier, don't require any pesticidal inputs or anything, it is just basically breeding, to make those trees healthier and able to withstand that disease.

Mr. {Bilirakis.} Thank you very much.

Ms. {Van Eenennaam.} I think that is a really important--which--this--depending what the application of the genetically-engineered crop is depends on the environmental impacts. For example, the disease-resistant papaya doesn't require any inputs, and it enables those crops to grow. And

so I think that you have to look at the application as to whether or not it has an increased or decreased effect on pesticide use. And it is really--it is application-specific and location-specific and country-specific.

Mr. {Bilirakis.} Thank you so much, doctor. And I am from the state of Florida, so I have a real interest.

Ms. Forshee, how much fuel does it take to plant and harvest your field? I know you talked about this a little bit, you alluded to it in your statement.

Ms. {Forshee.} How much what? I am--

Mr. {Bilirakis.} How much fuel--

Ms. {Forshee.} Fuel.

Mr. {Bilirakis.} --does it take to plant and harvest your field?

Ms. {Forshee.} Well, I would say that--wow, from planting to harvesting?

Mr. {Bilirakis.} Well, approximately.

Ms. {Forshee.} Right. I would take--I would say right now on my farm, we are not tilling the land. We are no-till farming. So we use fuel in our tractor when we plant the crop, which probably for a couple of hours of planting, you know, maybe like on an 80-acre farm would maybe consume about--I would say maybe a 1/4 of a tank of fuel to maybe 1/2 a, you know, tractor tank of fuel. So maybe 75 to 100

gallons there. And then we harvest the crop. I mean, you know, sometimes there does need to be an application if there is a weed problem, but--so I would say total, from planting to harvesting, maybe a couple hundred gallon, where before, if we were having to work the ground and, you know, really, you know, put strain on our tractors and equipment, it would double if not, you know, triple that fuel consumption.

Mr. {Bilirakis.} Thank you very much.

Ms. {Forshee.} Thank you.

Mr. {Bilirakis.} Thank you. Mr. Faber, if genetic modification were the only way to fight a particular disease, would the Environmental Working Group still oppose this type of technology?

Mr. {Faber.} Thank you for the question. We do not oppose genetic engineering, genetically-modified food ingredients. We think there are actually many promising applications of genetically-modified food ingredients. Dr. Van Eenennaam mentioned several of them. This isn't a question about the technology, this is a question of whether or not to require labeling; it is really a question of transparency, should people have this information to make their own choices for their own families. I am an optimist. I am optimistic that the promises that were made by the providers of this technology will ultimately be realized that

will have traits that are--produce more nutritious food, that will see significant yield increases. We haven't--all of those promises haven't yet been realized, but that is not what is at stake here in this question of whether or not to preempt Act 120, or whether or not to craft a national disclosure system. The real issue is should people have the right to decide for themselves, and does FDA have the authority now, I believe they do, to work with us to craft some kind of informative, fact-based, nonjudgmental disclosure on the back of the package.

Mr. {Bilirakis.} Okay, thank you very much.

I yield back, Mr. Chairman.

Mr. {Pitts.} Chair thanks the gentleman.

The chair now recognizes Mr. Matheson 5 minutes for questions.

Mr. {Matheson.} Thank you, Mr. Chairman.

Mr. Dempsey, in the--in your industry when people manufacture, makes the product, perhaps someone else is a distributor, perhaps someone else is the grocery store owner, if you have a product that was supposed to be made for the state of Maine, and it accidently went by a truck to Vermont and got put on a shelf, and Vermont charges $1,000 a day fine, who is going to pay the fine out of the manufacturer, the distributor or the grocery store owner?

Mr. {Dempsey.} My understanding with the Vermont law the way it is currently crafted is the manufacturer is responsible for that on $1,000 a day per SKU.

Mr. {Matheson.} Even if it--the distributor may be a separate third-party entity that--

Mr. {Dempsey.} Yes.

Mr. {Matheson.} --mistakenly went blunder?

Mr. {Dempsey.} Yeah, in fact, the way I understand the law, the retailer is absolutely exempt from that fine.

Mr. {Matheson.} Representative Webb, do you think that is a correct interpretation of the law?

Ms. {Webb.} Is that to me? For--the retailer would be responsible if the product was an agricultural product such as corn that was--

Mr. {Matheson.} I am talking about a pack of potato chips that got made some place else, and accidentally the distributor took it across state lines.

Ms. {Webb.} I would have to check on that.

Mr. {Matheson.} Okay.

Ms. {Webb.} I am happy to get back to you.

Mr. {Matheson.} Seems to me in this hearing we are talking about this consumer right to know. I find it interesting, this is on an issue where everyone has acknowledged there is no health or safety risk here. I find

this kind of a--it is the old cliché, a solution in search of a problem. Now, we do have a problem with mislabeling where people say something is natural, and no one can decide what natural is. And I think that Mr. Pompeo's legislation rightly encourages the FDA to move forward on that issue, and give clarity that issue, and I think that is important. I think that is something we have consensus across the board here, but whether or not we should be doing labeling on a component of food that has no demonstrated health or safety risk, that is a tougher one for some of us to swallow, I think.

Mr. {Faber.} Mr. Matheson, could I?

Mr. {Matheson.} No, I am going to ask you a question instead. I only have 5 minutes. You have indicated you think we should have a natural--national labeling system, but in addition to being a lobbyist for the Environmental Working Group, you are the executive director of Just Label It campaign.

Mr. {Faber.} That is correct.

Mr. {Matheson.} And the Just Label It campaign has spent a lot of money in a lot of states pushing state-based initiatives to set up individual state systems. Do you want state systems or do you want a national system, and why are you encouraging this effort at the state level?

Mr. {Faber.} Yeah, and as I testified--and thank you for the question, as I testified, we would greatly prefer a national solution. We believe that FDA has the authority to craft a national solution. We have--we--FDA has used that authority to require disclosures unrelated to safety and health, to your earlier point. When food is unsafe in the United States, at least since 1906, we don't label it, we take it off the shelves.

Mr. {Matheson.} We also make sure that--

Mr. {Faber.} And--but we--

Mr. {Matheson.} But why are you pursuing it in each state? Tell me why you--what is the agenda here?

Mr. {Faber.} In the absence--

Mr. {Matheson.} If I hear there is another agenda here--

Mr. {Faber.} There is no agenda here, except to--

Mr. {Matheson.} --but pursuing it at the state level.

Mr. {Faber.} --protect consumers. I wish that the Administration today would work with us to craft a national solution. In the absence of that leadership, we think it is appropriate for steps--states to step in and help protect consumers from--

Mr. {Matheson.} See, I appreciate that that is your statement. I tend to question the logic of that. I think if

you want a national standard, going out and stirring things up in every state to do a patchwork system that everyone around here said is a bad idea--

Mr. {Faber.} Well--

Mr. {Matheson.} --doesn't make much sense to me.

Mr. {Faber.} Let--

Mr. {Matheson.} And there may--you know, I am not--I don't want to get in a debate with you, but I don't see the consistency in that, and I think there may be other agendas involved in terms of pursuing it at the state level.

Congress can help this as well if you want to engage Congress. This committee is holding hearings. I think we would have a conversation if there ought to be some national standard or not, and I welcome this hearing. I welcome Chairman Pitts scheduling this because I think this is an issue that deserves a lot of discussion, but there is another effort going on and, boy, a lot of effort and resources being spent in these different states on state ballot initiatives, and I question what the motivation is, and if that really gets us to where anybody in this room really wants to be, maybe some people want to be there with that patchwork of 50 stats, 50 different rules, or as Mr. Pompeo said, maybe we shouldn't limit it to states. It could be counties, it could be cities, it could be a lot more than 50. I think we ought

to figure out what we are really trying to do here, and what the agendas are. And I think we ought to look for a national standard, at best, and I would suggest a national standard ought to be on science-based decision making about health and safety risks to consumers, to the integrity of our food supply chain, and that is what I encourage this--I think most people on a bipartisan basis would agree, that is the motivation for this committee in looking at this issue.

With that, Mr. Chairman, I will yield back the balance of my time.

Mr. {Pitts.} Chair thanks the gentleman.

Now recognize the gentleman from Maryland, Mr. Sarbanes, 5 minutes for questions.

Mr. {Sarbanes.} Thank you.

Mr. Faber, do you know if the Nutritional Fact Panel that is now required for products, did the FDA conclude that needed to be there for safety reasons, or was that something that the Congress just decided, in response to the demand they heard from the public, ought to be on products?

Mr. {Faber.} That is a terrific question. So the basis for the Nutrition Facts Panel was to try to promote nutrition and health.

Mr. {Sarbanes.} Um-hum.

Mr. {Faber.} The NLEA clearly preempted states from

changing the NFP, the Nutrition Facts Panel, from adding things to the ingredient line, or from regulating certain kinds of claims like health claims, but the NLEA was also carefully crafted to preserve for the states other roles in food labeling, and states have already stepped into that role in many ways. And Mrs. Webb talked about this, whether it is grading butter and cheese in Wisconsin, or use-by and sell-by dates in 41 different states. I am not arguing that--for a patchwork quilt, but I think we should recognize that Congress, more than 20 years ago, explicitly recognized--

Mr. {Sarbanes.} Um-hum.

Mr. {Faber.} --the longstanding role that states have played in food labeling, especially with regards to addressing consumer deception, and helping consumers understand what they are buying.

Mr. {Sarbanes.} Mr. Dempsey, if the choice were between a situation where there were 50 different labeling regimes, or 1 uniform labeling requirement, but that requirement were--that--was that you had to indicate whether there was genetically-engineered ingredients included, which would be the better one from your standpoint?

Mr. {Dempsey.} We would want a federal standard that would place the FDA as a mandatory resource for determining what was genetically modified and what was not genetically

modified, and we would want the labeling to be voluntary, similar to what we already have with organic. If someone wants an organic product, they go through an organic certification by the USDA, and we put organic on that. We do not put non-organic on the balance of the products. So it seems to me that forcing a mandatory labeling law onto products that are the predominant ones on the supermarket shelf goes against commonsense, and goes against convention and practice that we already have in the food industry.

Mr. {Sarbanes.} Well, leaving this side of the debate about whether it makes commonsense or not, would it be preferable to having 50 different labeling--

Mr. {Dempsey.} Certainly preferable.

Mr. {Sarbanes.} Okay. Now, if there was such a label, could it be as simple as some would say, may contain genetically-engineered ingredients? And I don't know what the Vermont one says, but could you envision a national, Ms. Webb, standard that would essentially say something like that?

Ms. {Webb.} We do have--we do allow for may--

Mr. {Sarbanes.} Um-hum.

Ms. {Webb.} --contain.

Mr. {Sarbanes.} Um-hum. Because it--as I am thinking about the disruption to the supply chain, it would seem to me

that the burden, frankly, would end up being on those who want to be able to establish that their product is completely free of GE, to sort of police that supply chain. So just from a pricing standpoint, the genetically-engineered products, even if they had whatever extra cost you might attribute to that requirement added in, would end up being a lot less expensive potentially than the others. I am not asking a question, I am just kind of musing here about it.

So I guess what I am trying to sort out is, I don't think the public's reaction to knowing that something is genetically engineered is going to be--to create some huge distortion in the current nature of demand out there. I think many will say, maybe genetically engineered, I get that. They will do price comparisons. They will look at fiber, they will look at other things, what--and they will make a decision on buying a product. And I am not also convinced that the industry can't handle the supply chain issues in a way that is significantly less expensive than the numbers that are being invoked, but it is a very complicated issue. I come from the perspective that there should be a right to know there, but within the context of that, I am ready to explore how industry can manage that right to know as efficiently and manageably as possible. Yeah, you just want to--

Mr. {Dempsey.} It seems to me there is a right to know--

Mr. {Sarbanes.} Um-hum.

Mr. {Dempsey.} --and the right to know is to look and shop for, as an organic shopper or a GMO shopper, for those seals that go through a certified and rigorous--

Mr. {Sarbanes.} Um-hum.

Mr. {Dempsey.} --certification process. That is the lack of transparency, if you ask me. It is also from a--our members' perspective gives a marketing advantage to it, and in most cases, these products are more expensive than the, if you will, conventional products that are on the shelf. So I mean there is information out there if the intelligent, educated consumer wants to find that product.

Mr. {Faber.} And to add--and unfortunately, consumers are looking at those claims, natural and organic, and many of them are getting it exactly backwards. They are thinking the natural claim that might be on a multigrain tortilla snack chip is the one that is GMO-free, and they look at the organic certification and they don't quite know what that means. And so that is why we think addressing the use of the word natural, and having a modest, nonjudgmental disclosure would help cure that consumer confusion. Consumers are extraordinarily busy, they are looking for a simple way to

know what they are buying so they can use their buying power to shape the market.

Mr. {Sarbanes.} Thank you.

I yield back.

Ms. {Webb.} May I add also that in deference to Mr. Dempsey's concern for small--smaller businesses, the cost for a small business to go through the non-GMO project is prohibitive for them, and--which is why we were looking at the expense to go to the larger industry, rather than for people trying to get--

Mr. {Pitts.} Gentleman's time has expired.

Chair recognizes the gentleman from Texas, Mr. Green, 5 minutes for questions.

Mr. {Green.} Thank you, Mr. Chairman.

Coming from Texas though, when you say, you know, it is a multigrain tortilla chip, you know, corn is corn, but I know my daughter keeps telling me multigrain chips are much better.

Mr. Dempsey, can you elaborate on how you feel the Vermont Act 120 would lead to a consolidation in the industry and it would--many small businesses force to close, and also are the multi-category, multinational players the only companies that can currently have the capability to change their supply chain and bear these type of costs?

Mr. {Dempsey.} Smaller companies, the ones I would define as smaller companies, are plants with--or companies with one plant, one line.

Mr. {Green.} Yeah.

Mr. {Dempsey.} And as I said in my statements, the closing those lines takes significant time out of the production process that would not be able to go right from non-GMO to GMO product. So then the companies have to decide whether they participate in the GMO--the non-GMO labeling or the GMO labeling as it is in Vermont. They will have to make a decision on whether--what products qualify to go into Vermont without labeling, and which ones don't. And a lot of those will determine both the distribution networks, some of those are DSD, some of those are warehouse, how do you leave open your, if you will, your company to fines if the wrong product gets into the wrong--into Vermont.

Mr. {Green.} Okay. Mr. Faber, according to the non-GMO foods, the U.S. market perspective, GMO foods are expected to account for up to 40 percent of the market by 2017, representing a value of about $264 billion. You state that consumers deserve a choice of knowing what is in their food, but isn't the market already voluntarily moving in that direction?

Mr. {Faber.} Well, today, only about 3 percent of SKUs

are certified as GMO-free by the non-GMO project, and so consumers are much likely to see--today to see a natural claim on their multigrain tortilla chip--

Mr. {Green.} Um-hum.

Mr. {Faber.} --than to see the little butterfly that means it has been a non-GMO certified multigrain tortilla chip. So consumers are much more likely today, and in the near future, to think that they are using their buying power to avoid GMOs, if that is what they choose to do, than they would if they are relying on that certification.

Mr. {Green.} Do you think there are any costs shifted to consumers due to the mandatory labeling laws and how they might change the operation of our food supply?

Mr. {Faber.} You know, I don't believe that they will--even if we had a modest informational GMO disclosure tomorrow, that you would see dramatic change in buying behavior, and we have--we know because we have GMO labeling in some form or another in 64 other countries, including countries where people eat more or less like us. Brazil is a great example where they have had a GMO disclosure since 2001, and where consumers have conferred a benefit to the GMO disclosure, and that is why they have not seen any significant change in buying behavior. So I am confident that if we had a GMO disclosure tomorrow, that the food

industry would take all the money they have been spending to fight these ballot initiatives, which is now more than $100 million, and invest it into a topnotch consumer education campaign to persuade consumers that GMOs have all the benefits that we have heard about during this hearing.

Mr. {Green.} Well, and I guess that is my concern that, you know, we heard from the FDA and, you know, with their resources and, of course, we depend--we decide their resources to do the inspections, but, you know, there has been no proof that GMOs are actually bad to consume, and we also know, and I assume we will have testimony, but this is not the Ag Committee, but we have--the--some of the GMOs have actually expanded our possibilities for food production, not only in our own country, because obviously we eat very well, but in parts of the world where starvation is an issue, whether it be the GMO rice product that you can--but--and those have been shown that they are not--they don't harm humans, but it does help the nutrition issues.

Mr. {Faber.} And as I said earlier, no one is arguing that farmers should be prohibited from planting GMOs, and GMO traits may indeed provide benefits to farmers or nutritional benefits someday. The--I think the real question here is whether or not people should be able to decide for themselves, and whether or not FDA has the authority to do

so. As Mr. Waxman was talking about earlier, FDA has compelled disclosures simply because of consumer interest, and up until 1992, for the years between 1938 and 1992, understood that word material that we talked about earlier to mean--really to mean relevant. Was it information that a consumer would want to have in order to make an educated choice.

Mr. {Green.} Thank you for your patience, Mr. Chairman. I know I ran over time a little bit.

Mr. {Pitts.} Chair thanks the gentleman.

Now recognize Mr. Pompeo 5 minutes for questions.

Mr. {Pompeo.} Thank you, Mr. Chairman.

Ms. Forshee, thank you again for traveling out here to be here. You talked about the costs that would increase your farm--your small business to operate. I assume you wouldn't just eat those costs, you would attempt to pass them on as best you could to your customers?

Ms. {Forshee.} Yes, just like any small business. I mean I left off--I think I left off the fact that we have one full-time hired man as well, so, you know, not only do we farm, but we do--we--I mean farming is a business--

Mr. {Pompeo.} Yeah.

Ms. {Forshee.} --and that is exactly right, that would have to be passed down.

Mr. {Pompeo.} I appreciate that. I have a lot of ground, I want to try and get some yes-or-no answers. We haven't been successful so far today. I am confident I will be the first to do so.

Earlier today, we had FDA a witness testify, a very senior FDA official testify. He said that GE foods in the U.S. marketplace today are safe as their conventional counterparts. We will start on my left, your right, and tell me if you agree, yes or no, with that statement.

Ms. {Van Eenennaam.} Yes.

Mr. {Faber.} I believe so.

Mr. {Pompeo.} That is a yes, for the record.

Ms. {Webb.} Yes.

Mr. {Pompeo.} Just yes, yeah.

Ms. {Forshee.} Yes.

Mr. {Dempsey.} Yes.

Mr. {Pompeo.} Yes. We have total unanimity. That is fantastic. That is one of the first times in this committee we have had that in my 4 years here, so that is all good news.

And, Mr. Faber, you were talking about misinformation out there. I can tell you you are part of the problem. Your organization is part of the problem. Mr. Matheson asked you about it. You say you don't want a patchwork. You have

spent millions of dollars stirring up trouble to create just that patchwork of regulation, and you are continuing to do so today. I am confident that the phones are ringing in my office as a result of your efforts to stir up this very challenge. And so I would just urge you to work to get to the right place. This piece of legislation requires the FDA to define natural, the very thing that you spent so much time in your testimony speaking to. So I am with you.

Mr. {Faber.} Yeah.

Mr. {Pallone.} I want that to occur. But when you put up things and you call this piece of legislation the dark act, saying we are denying consumers the right to know, there is nothing in this legislation that denies any consumer any capacity to know precisely what it is they are eating. If any willing provider deems it appropriate, and finds customer demand to provide information to their customers about the nature of that product, no one's right to know is being impinged today, nor would it be if this Bill became law.

So as you--as you are out there working to defeat this legislation, I hope you will be honest in the way you talk to America about this because it is very important that folks have the right to know. This Bill would never impinge on that. So I am sure today you will go out and issue something that says that this is not the dark act. I look forward to

reading that on my Web site.

Mr. Dempsey, you were talking about this. One to 10 on a scale, how does this impact the businesses that you represent if we were--if we fail to get this law put into place and a patchwork of rules becomes the norm in America?

Mr. {Dempsey.} Ten being the most difficult scenario?

Mr. {Pompeo.} Sure.

Mr. {Dempsey.} Ten for sure.

Mr. {Pompeo.} And so if it is a 10, what is it for the smallest businesses in America?

Mr. {Dempsey.} Multiply that times 10.

Mr. {Pompeo.} Thank you.

Ms. Webb, how many FDA-level quality scientists are employed by the state of Vermont today that are reviewing these sets of food rules?

Ms. {Webb.} I have no idea.

Mr. {Pompeo.} So you--

Ms. {Webb.} We are not trying to compete with the FDA or be the FDA.

Mr. {Pompeo.} So are there any folks that are experts in food safety applied today by the state of Vermont that is trying to put forth a set of rules that I promise you the citizens you represent think have something to do with food safety?

Ms. {Webb.} I would have to get back to you on that.

Mr. {Pompeo.} You don't know. I would appreciate you getting back with the committee and answering that question.

I want to come back to choice, Ms. Forshee, and this really comes to you. You are both the producer and the consumer. Today, if you decided, for whatever reason, because you had some personal preference with respect to non-GMO foods, do you think you could walk into a store somewhere, I guess not near you, 20 miles, but somewhere in Kansas and find that set of products on the shelves, or if you didn't, contact the providers of those foods and say I want you to label that? Do you think you could pull that off?

Ms. {Forshee.} No. I mean--

Mr. {Pompeo.} Yeah.

Ms. {Forshee.} --I don't believe so.

Mr. {Pompeo.} Yeah.

Ms. {Forshee.} I really don't.

Mr. {Pompeo.} Yeah.

Ms. {Forshee.} I mean I feel that it is safe--

Mr. {Pompeo.} Yeah.

Ms. {Forshee.} --and that is--I just--that is what I care about is knowing that it is safe, but no.

Mr. {Pompeo.} I appreciate that.

Mr. Chairman, I yield back.

Mr. {Pitts.} All right, the chair thanks the gentleman.

That concludes the questions of the members present. I am sure we will have follow-up questions. We will send them to you in writing. We ask that you please respond promptly.

And members will have 10 business days to submit questions for the records. That means they should submit their questions by the close of business on Monday, December 29.

Thank you very much for your testimony, for your willingness to come today, in a very important and informative hearing.

Without objection, the subcommittee is adjourned.

[Whereupon, at 1:13 p.m., the subcommittee was adjourned.]

Fear and Misunderstanding of Biotechnology Driving Caregivers to Use Dangerous Homemade Formula

Following are samples of the numerous recipes for homemade formula and comments posted on blogs and social media pages indicating use of or recommending homemade infant formula to avoid genetically engineered ingredients.

Shared by 78 people

GMO Inside
May 16, 2014 ·

Avoiding GMOs as an expecting mother can
challenging, since more than 80% of proces
foods contain GMOs. Buying certified-organi
and non-GMO verified products are the only
can truly stay away from GMOs, since GMO
not labeled.

Prenatal care and postnatal care for your ba
should not include toxic chemicals like Roun
you expose newborns or fetuses to substanc
impair liver and immune function like Roundu
infant has increased health risks.

For non-GMO formula alternatives we've pull
together make your own recipes, donor milk
certified organic formula and other resource
http://gmoinside.org/non-gmo-infant-formula-
urces/

Sign our petition to Gerber, Enfamil and Simi
reformulate their GMO laden formulas. http://
action.greenamerica.org/p/dia/action/public/
action_KEY=10597 GMO Inside

Like · Comment · Share

1,001 people like this. Top Co

662 shares

Stacie Shenz LaMothe Proud to say I ha
GMO free baby growing inside me 18
Like · Reply · 25 May 16, 2014 at 12:5

3 Replies

Kimberly Dwyer I really appreciate the
assistance I get with WIC but so wish they
join the non-gmo project!!!
Like · Reply · 12 May 15, 2014 at 1:4

Write a comment...

When confronted with imagery like this, it is no wonder that caregivers would have concerns.

Over 15K shares

3 Companies Using GMOs in Baby Formula

Support Local Food! Please Share...

15.2K | 255 | 87 | 14 | 3

Share | Tweet | Reddit | Tumblr

These are questionable credentials to establish her to provide nutritional advice for infants.

What to do?

You can boycott all these companies and start making your own home-made, natural baby formula without toxic chemicals and pesticides and nasty GMOs. The assistant director of the FDA, Nick Duy, says we shouldn't make our own baby formula, but why isn't he ousting these companies for using questionable (at best) and health-damaging GMOs?

About the Author

Christina Sarich is a musician, yogi, humanitarian and freelance writer who channels many hours of studying Lao Tzu, Paramahansa Yogananda, Rob Brezny, Miles Davis, and Tom Robbins into interesting tidbits to help you Wake up Your Sleepy Little Head, and See the Big Picture. Her blog is Yoga for the New World. Her latest book is Pharma Sutra: Healing the Body And Mind Through the Art of Yoga.

This article has been shared by more than 76 people.

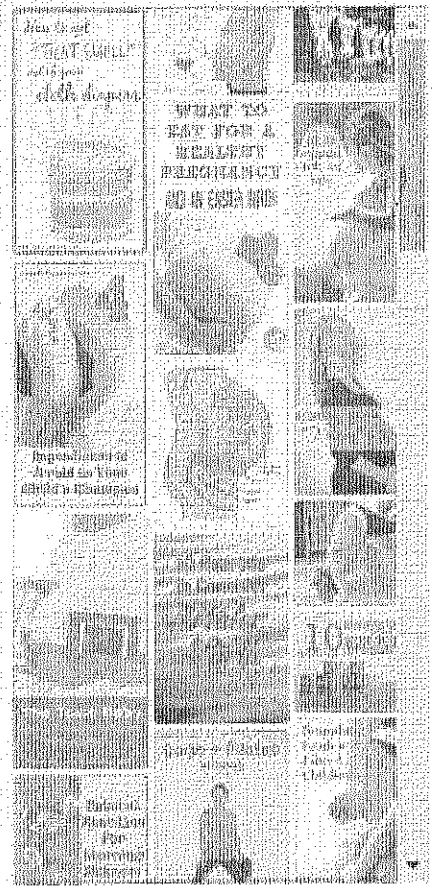
Pin it 75 | Like 13 | Visit Site | Send | Share

Found on justenjoyfood.com

Just Enjoy Food- Dr. Meghan Birt · 45 weeks ago

Homemade Goat Milk Formula Recipe. I believe we all agree that breast is best when it comes to feeding infants. But that's not always possible for all mom's. This recipe for Goat Milk Formula will take away the stress and give you a whole-food nutritious way to feed your baby and be able to avoid the GMO laden conventional powdered formulas from the store. Plus, you can make it for a fraction of the cost! --From Just Enjoy Food

Natural Kids and Ba...
Just Enjoy Food- Dr. M...



Q: I have a 3 month old daughter and wanted to know if is there are GMO free soy baby formula? I have been using Simulac Soy for the reflux benefits and cannot find any information on whether or not it is GMO free.

A: First, I wouldn't recommend you feed your daughter an infant formula at all, especially not one based on soy. Soy contains xenoestrogens and other compounds that can negatively impact the health of adults let alone young babies. It is particularly poor for the developing endocrine system and has been linked to the development of autoimmune thyroid disease. Nevertheless, I understand that there are likely to be other reasons beyond my knowledge that

Third, consider a homemade goat's milk formula.

Alternatively, many moms have had great success with a homemade milk-based infant formula. Since your daughter is cows milk intolerant, choosing goats milk might work very well for her as many babies who cannot tolerate cows milk can tolerate goats milk. Check out this recipe for a homemade infant formula by the Weston A. Price Foundation.

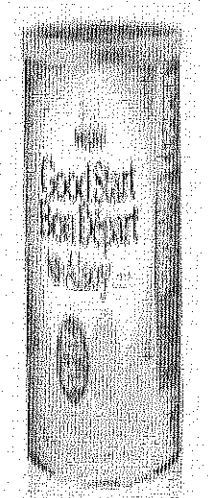
How Nestle Gerber Poison Babies With Genetically Modified Ingredients

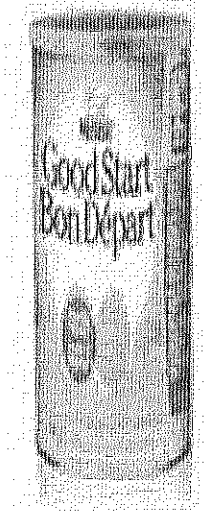
By sal on May 4, 2012 11:06 AM | Permalink | Comments (0)

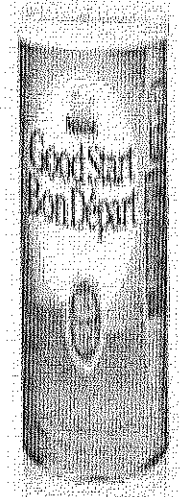
PreventDisease.com

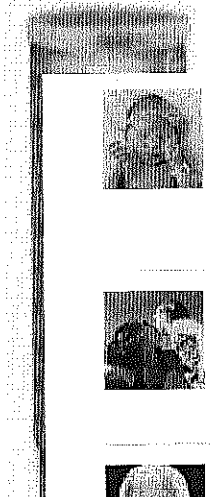
May 4, 2012

Parents who feed their newborn and young babies any of Nestle Gerber's product lines are risking their infant's health by exposure to an abundance of toxic genetically modified (GM) ingredients that the company claims are "safe."









Corie Ring · Follow · Top Commenter · Portland, Michigan

I thank god I can breastfeed my baby because she isn't getting ANY of this crap in her body.....making my own organic baby food too when she starts eating solids..... Poisoning people for profit.

Reply · Like · 1 · Follow Post · April 15, 2013 at 7:37am

Sherri Tate

make your own formula. that's what I'm about to start doing... if you can't make your own use raw goats milk...

Reply · Like · Follow Post · April 15, 2013 at 1:51am

Nick Thomas · Top Commenter · Kingsbridge Grammar School

New film just released this month is a "Must Watch"!
http://www.youtube.com/watch?v=odCSWY05u4Q

Reply · Like · Follow Post · September 21, 2012 at 5:09am

Christine Gordon · Executive Director/ Program Developer at Drug Free Africa/ SASAP- South African Substance Abuse Professionals

ATTENTION ALL PARENT! PLEASE READ THIS...THE DEVIL IS REALLY TRYING TO 'KILL' OUR CHILDREN.

Reply · Like · 2 · Follow Post · May 4, 2012 at 2:55pm

FAQ–Homemade Baby Formula

Posted on September 22, 2005 by Sally Fallon and Mary G. Enig, PhD • 114 Comments

Print - PDF - Email

The advice to make homemade baby formula as an alternative to commercial formula has been one of the most controversial positions taken by the Weston A. Price Foundation—and also one that has elicited the most grateful praise. While government officials and orthodox pediatricians are often appalled at the thought of a parent mixing up baby formula—and one based on raw milk, no less—the feedback we have received from parents has been extremely positive.

Some breastfeeding advocates have also criticized our stance, claiming that by providing a more healthy alternative to commercial formulas, we are discouraging breastfeeding. **Make no mistake: the best food for baby is breastmilk from a *healthy* mother.** However, many situations call out for a good substitute: adopted and orphaned babies, babies born to mothers with serious health problems, and babies whose mothers do not have enough milk (a situation that does happen occasionally) deserve to receive something better than commercial formula.

The following questions have been compiled by the authors over a period of several years and should cover most situations encountered by parents giving homemade formula to their babies. Refer to these Q&A when using our Recipes for Homemade Baby Formula. See also **videos** on making the formulas by Chapter Leader Sarah Pope: Milk Based & Liver Based Formula Video.

Many homemade formula recipes recommend use of raw milk, which has the potential to introduce dangerous pathogens.

RaddestMom

Full Recipe http://raddestmom.com/2012/11/03/homemade-baby-formula/

I'm not sure. I know people who have used it from infancy and it's been fine. As a mom, you have to feel good about whatever choice you make, though. I highly recommend my homemade formula recipe, even if you don't use raw milk you can use pasteurized goat's milk from the grocery store to make it.

AUGUST 30, 2013 AT 10:38 PM

Blog author recommending homemade formula using raw milk

Pin it 5 | Like 1 | Visit Site | Send | Share

Found on gmoinside.org

Chelsea LeVeck · 1 year ago

I am FULLY a breastfeeding advocate but for an adoption (or surrogacy) if you cant fully nurse this may be a good option. RECIPE: Make your own Non-GMO Infant Formula | GMO InsideGMO Inside

Sources:

- http://justenjoyfood.com/2014/04/homemade-goat-milk-formula-recipe/
- http://truthinlabelingcoalition.org/motherapple.html
- http://gmoinside.org/downsides-to-gmo-infant-formula-we-asked-a-pediatrician/
- http://raddestmom.com/2012/11/03/homemade-baby-formula/
- http://eatlocalgrown.com/article/12283-3-companies-using-gmos-in-baby-formula.html
- http://www.westonaprice.org/health-topics/faq-homemade-baby-formula/
- http://www.nationofchange.org/3-companies-using-gmos-baby-formula-1381762135
- http://responsibletechnology.org/docs/BabyFoodCampaignBroch.pdf
- https://www.facebook.com/GmoFreeBabies
- https://momshouldknow.wordpress.com/2012/11/09/my-search-for-a-non-gmo-infant-formula/
- http://nourishedkitchen.com/gmo-free-infant-formula/

http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm048694.htm

Nutritional Specifications

FDA's nutrient specifications for infant formulas are set at levels to meet the nutritional needs of infants. In addition, formula manufacturers set nutrient levels that are generally above the FDA minimum requirements. Thus, babies fed infant formulas do not need additional nutrients, unless they are being fed a low-iron formula.

Iron

The infant formulas currently available in the United States are either "iron-fortified"—with approximately 12 milligrams of iron per liter—or "low iron"—with approximately 2 milligrams of iron per liter.

The American Academy of Pediatrics (AAP) recommends that formula-fed infants receive an iron-fortified formula as a way of reducing the prevalence of iron-deficiency anemia.

If infants are fed a low-iron formula, a health care professional may recommend a supplemental source of iron, particularly after 4 months old.

Whole cow's milk

Consult your pediatrician before feeding your baby anything except breast milk or infant formula. Whole cow's milk is considered an inappropriate option for infants, which FDA defines as babies not more than 12 months old.

According to AAP, cow's milk contains very little iron and the small amount present is poorly absorbed into the body. Starting an infant on cow's milk too early can result in iron-deficiency anemia, particularly if the baby is not given an iron supplement or foods with iron.

Also, cow's milk given to an infant under 6 months old can cause irritation of the bowel and small amounts of blood loss. This causes loss of red blood cells, and can result in anemia.

back to top

Safety Issues

- Formula preparation. In most cases, it's safe to mix formula using ordinary cold tap water that's brought to a boil and then boiled for one minute and cooled. According to the World Health Organization, recent studies suggest that mixing powdered formula with water at a temperature of at least 70 degree C—158 degrees F—creates a high probability that the formula will not contain the bacterium *Enterobacter sakazakii*—a rare cause of bloodstream and central nervous system infections. Remember that formula made with hot water needs to be cooled quickly to body temperature—about 98 degrees F—if it is being fed to the baby immediately. If the formula is not being fed immediately, refrigerate it right away and keep refrigerated until feeding.
- Storage. Manufacturers must include instructions on infant formula packaging for before and after the container is opened. They must also include information on the storage and disposal of prepared formula.
- Freezing formula. This is not recommended, as it may cause a separation of the product's components.
- Homemade formula. FDA does not regulate or recommend recipes for these. Errors in selecting and combining ingredients for homemade formula can have serious consequences affecting the nutrition and overall well-being of the infant.
- Counterfeit formula. These formulas have been diverted from normal distribution channels and relabeled to misrepresent quality or identity. An example is illegal labeling of the "use by" date. Infant formula may also be illegally relabeled to disguise its true content. This can lead to serious adverse health consequences for infants who cannot tolerate certain ingredients.
- Formula changes. Always look for any changes in formula color, smell, or taste. If you buy formula by the case, make sure the lot numbers and "use by" dates on the containers and boxes match. Also, check containers for damage, and call the manufacturer's toll-free number with any concerns or questions. You may contact FDA (see below.)

back to top

http://www.fda.gov/Food/ResourcesForYou/HealthEducators/ucm089629.htm

- **Don't give raw or unpasteurized milk or unpasteurized fruit or vegetable juice to infants or young children.** Unpasteurized milk or juice may contain harmful bacteria. Unpasteurized juices are normally found in the refrigerated sections of grocery stores, health-food stores, cider mills, or farm markets. Such juices must have this warning on the label:

WARNING: This product has not been pasteurized and therefore may contain harmful bacteria that can cause serious illness in children, the elderly, and persons with weakened immune systems.	NOTE: Juices that are fresh-squeezed and sold by the glass, such as at farmer's markets, at roadside stands, or in some juice bars, may not be pasteurized, or otherwise treated to ensure their safety. Warning labels are not required on these products. Young children should avoid these juices.

If you can't tell if a juice has been processed to destroy harmful bacteria, either don't use the product or boil it to kill any harmful bacteria.

AAP: http://pediatrics.aappublications.org/content/125/4/e973.full

Case Report

Fresh Goat's Milk for Infants: Myths and Realities—A Review

Sangita Basnet, MD, FAAP[a], Michael Schneider, MD[a], Avihu Gazit, MD[b], Gurpreet Mander, MD, FAAP[a], Allan Doctor, MD[b]

Author Affiliations

ABSTRACT

Many infants are exclusively fed unmodified goat's milk as a result of cultural beliefs as well as exposure to false online information. Anecdotal reports have described a host of morbidities associated with that practice, including severe electrolyte abnormalities, metabolic acidosis, megaloblastic anemia, allergic reactions including life-threatening anaphylactic shock, hemolytic uremic syndrome, and infections. We describe here an infant who was fed raw goat's milk and sustained intracranial infarctions in the setting of severe azotemia and hypernatremia, and we provide a comprehensive review of the consequences associated with this dangerous practice.

Key Words:

• goat's milk • infant feeding • hypernatremia

The developed world does not lack nutritious food; nevertheless, infants may still suffer from inadequate and inappropriate nutrition because of parental and cultural beliefs. Furthermore, easy access to the Internet exposes women to false information in regards to alternative foods for their infants, such as raw goat's milk, that may cause severe morbidity and even death. We describe here the case of an infant with severe electrolyte imbalance, renal dysfunction, and stroke as a result of being fed goat's milk.

AAP: http://brightfutures.aap.org/pdfs/BFNutrition3rdEdition_tools.pdf

INTERPRETIVE NOTES:

1. Feeding is crucial for the development of a healthy relationship between parents and their infant. A parent's responsiveness to an infant's cues of hunger and satiation and the close physical contact during feeding facilitate healthy social and emotional development.
2. Signs of hunger include hand-to-mouth activity, rooting, pre-cry facial grimaces, fussing sounds, reaching for utensils, and crying. Signs of fullness include turning the head away from the nipple, showing interest in things other than eating, playing with food, and closing the mouth.
3. Infants should be fed breast milk or iron-fortified infant formula, even in infant cereal. If infants are weaned from breast milk before age 12 months, they should be fed iron-fortified infant formula rather than cow's milk. Cow's milk, goat's milk, and soy milk are not recommended during the first 12 months of life.
4. In establishing realistic feeding goals for infants, it is important to assess an infant's developmental readiness for eating foods with different textures as well as her self-feeding skills. Before beginning to eat from a spoon, infants should be able to hold their heads upright and move their tongues from side to side.
5. Complementary (solid) foods can be introduced between ages 4 and 6 months when the infant is developmentally ready. After the infant has accepted iron-fortified infant cereal, then pureed or soft fruits, vegetables, and meats can be offered. Only one new food should be introduced at a time; parents should wait 3 to 5 days to see how the infant tolerates the food (observe for signs of allergic reaction). There is no research to support a particular order when introducing new foods.

USDA: http://www.nal.usda.gov/wicworks/Topics/FG/Chapter4_InfantFormulaFeeding.pdf

Evaporated Cow's Milk

Homemade formulas made from evaporated milk are not recommended in the first 12 months of life.[29] Evaporated whole milk is whole cow's milk from which approximately 60 percent of the water has been removed. This milk is fortified with vitamin D but remains low in the same nutrients as whole cow's milk and low in folate if the milk is boiled. Evaporated milk can also be made from skim cow's milk. Before the development of infant formulas, evaporated whole milk was used to make a homemade infant formula which was thought to be easier for an infant's kidneys and digestive system to handle than plain whole cow's milk. However, the disadvantages of evaporated milk formulas are now considered similar to those of whole cow's milk.

Goat's Milk

Goat's milk is **not** recommended for infants.[29] Goat's milk contains inadequate quantities of iron, folate, vitamins C and D, thiamin, niacin, vitamin B6, and pantothenic acid to meet an infant's nutritional needs. Some brands of goat's milk are fortified with vitamin D and folate, but other brands may not be fortified. This milk also has a higher renal solute load compared to cow's milk and can place stress on an infant's kidneys. This milk has been found to cause a dangerous condition called metabolic acidosis when fed to infants in the first month of life.

Google search of "how to make homemade infant formula" found over 94,000 results

how to make homemade infant formula

Web Images Maps Shopping Recipes More Search tools

About 94,200 results (0.46 seconds)

How to Make Homemade Baby Formula - Cheeseslave

www.cheeseslave.com/**how-to-make-homemade-baby-formula**/
by Ann Marie Michaels - in 433 Google+ circles
Sep 29, 2008 – Why would you want to **make homemade baby formula**? Breast milk is the best thing for babies, but some of us have not had an easy time ...

Making a Recipe for **Homemade** Baby **Infant Formula** - Learn about ...
wholesome**baby**food.momtastic.com/**homemadebabyinfantformula**.htm
Jul 18, 2011 – How to Make Homemade Baby Infant Formula. Is it Safe to **Make Homemade Baby Formula**? Should you make homemade formula for your ...

Formula - **Homemade Baby Formula** - Weston A Price Foundation
www.westonaprice.org/childrens.../recipes-for-**homemade-baby-formula**
Dec 31, 2001 – Recipes for making **homemade formula** from raw milk or meat, when ... If you are forced to use commercial **formula**, make sure that baby is ...
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How to make homemade infant formula - YouTube
www.youtube.com/watch?v=X4h0qOUdwkY
Aug 10, 2012 – UPDATE: I have uploaded a video going into details on everything from exactly why we decided to look into a different alternative, to estimated ...

Making **home made infant formula** - Food For Kids Health
foodforkidshealth.com/making-**home-made-infant-formula**-for-babies-se...
29. Jun. Making **home made infant formula** for babies sensitive to dairy formula ... **How to make infant formula** using natural ingredients and raw milk. Video 1: ...

GMO Inside email to members:

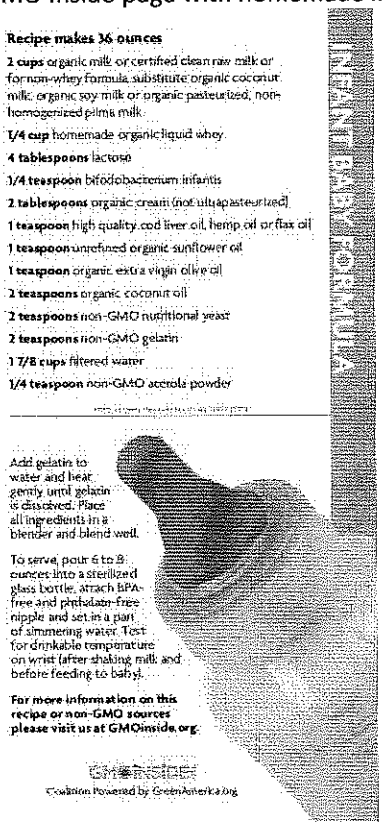
Learn More on the GMO Inside Blog:

Dr. Michelle Perro explains the risks of GMOs in an infant's diet.

Is your baby part of a risky science experiement? Read our press release.

Stay tuned this month for tips on non-GMO alternatives and how to make your own non-GMO formula.

GMO Inside page with homemade infant formula recipes: http://gmoinside.org/non-gmo-infant-formula-recipe/



Recipe makes 36 ounces

2 cups organic milk or certified clean raw milk or for non-whey formula, substitute organic coconut milk, organic soy milk or organic pasteurized, non-homogenized palma milk

1/4 cup homemade organic liquid whey

4 tablespoons lactose

1/4 teaspoon bifidobacterium infantis

2 tablespoons organic cream (not ultrapasteurized)

1 teaspoon high quality cod liver oil, hemp oil or flax oil

1 teaspoon unrefined organic sunflower oil

1 teaspoon organic extra virgin olive oil

2 teaspoons organic coconut oil

2 teaspoons non-GMO nutritional yeast

2 teaspoons non-GMO gelatin

1 7/8 cups filtered water

1/4 teaspoon non-GMO acerola powder

Add gelatin to water and heat gently until gelatin is dissolved. Place all ingredients in a blender and blend well.

To serve, pour 6 to 8 ounces into a sterilized glass bottle, attach BPA-free and phthalate-free nipple and set in a pan of simmering water. Test for drinkable temperature on wrist (after shaking milk and before feeding to baby).

For more information on this recipe or non-GMO sources please visit us at GMOinside.org.

GMO Inside

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http://drlwilson.com/ARTICLES/BABY%20FORMULA.htm

If breast feeding is not possible. Rarely, breast feeding is not possible because the baby is "sensitive" to breast milk or the mother is ill and cannot feed, and no wet nurse or milk bank can be found. These options are discussed below. In these cases only, the homemade formula described in this article is far superior to any commercial formula that I know of, and is worth the possible extra cost and the work of preparing it for your child.

WHY HOMEMADE FORMULA?

A baby's digestive tract is extremely delicate. Babies should not have adult food until they are at least two years old, and preferably not until they are three or older. A baby can breastfeed for as long as he or she wishes, and usually will stop of its own accord around age 3 to 4. Until that time, many babies need only breast milk if it is high quality, which unfortunately is rare, but can be produced quickly if the mother follows a properly designed nutritional balancing program.

Now let us discuss options many mothers resort to that are not very good. If a mother cannot or does not want to breastfeed her baby for any reason, several options exist:

1. Commercial baby formula such as Similac® and Enfamil®. *Formula* is a term that means a combination of foods that approximates the composition of mother's milk, basically. Unfortunately, commercial formula contains refined sugars, at times soy, powdered milk, cheap quality vitamins, preservatives, additives and other things that have no place in anyone's diet, let along that of a baby. **Most all of it is utter garbage and should never be used!**

http://articles.mercola.com/sites/articles/archive/2010/08/05/which-infant-formulas-contain-secret-toxic-chemicals.aspx

By Marie Bishop, Sally Fallon and Mary G. Enig, PhD

From *Wise Traditions in Food, Farming and the Healing Arts*, the quarterly magazine of the Weston A. Price Foundation, Volume 6, Number 2, Pages 18-28.

The advice to make homemade baby formula as an alternative to commercial formula has been one of the most controversial positions taken by the Weston A. Price Foundation -- and also one that has elicited the most grateful praise.

While government officials and orthodox pediatricians are often appalled at the thought of a parent mixing up baby formula -- and one based on raw milk, no less -- the feedback we have received from parents has been extremely positive.

Some breastfeeding advocates have also criticized our stance, claiming that by providing a more healthy alternative to commercial formulas, we are discouraging breastfeeding. Make no mistake: the best food for baby is breast milk from a healthy mother.

Milk-Based Formula: Makes 36 ounces

Our milk-based formula takes account of the fact that human milk is richer in whey, lactose, vitamin C, niacin, and long-chain polyunsaturated fatty acids compared to cow's milk but leaner in casein (milk protein).

The addition of gelatin to cow's milk formula will make it more digestible for the infant. Use only truly expeller-expressed oils in the formula recipes, otherwise they may lack vitamin E.

The ideal milk for baby, if he cannot be breastfed, is clean, whole raw milk from old-fashioned cows, certified free of disease that feed on green pasture. For sources of good-quality milk, see www.realmilk.com or contact a local chapter of the Weston A. Price Foundation.

If the only choice available to you is commercial milk, choose whole milk, preferably organic and unhomogenized, and culture it with a piima or kefir culture to restore enzymes (available from G.E.M. Cultures 707-964-2922).

http://www.huffingtonpost.com/barbara-dehn/homemade-formula-recipe-f_b_254052.html

Barbara Dehn

Nurse Barb is a practicing Nurse Practitioner, lecturer at Stanford and appears regularly on TV as a health expert.

GET UPDATES FROM BARBARA DEHN

Homemade Formula: Recipe for Disaster

http://www.nbcnews.com/id/18574603/ns/us_news-crime_and_courts/t/vegan-couple-sentenced-life-over-babys-death/#.UYPgDbVO-So

Vegan couple sentenced to life over baby's death

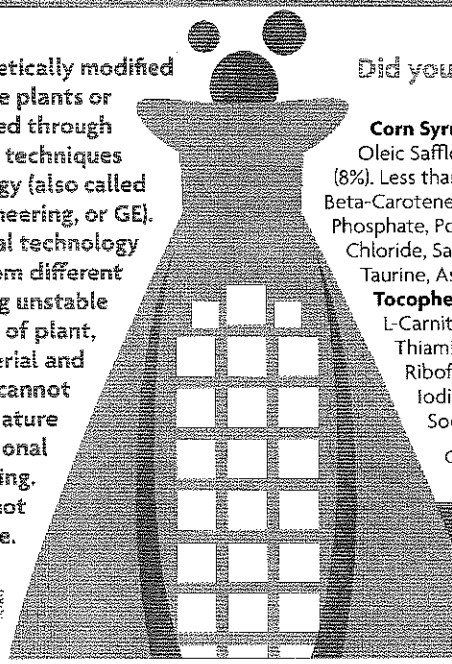
Malnourished baby was fed soy milk and apple juice, weighed 3 1/2 pounds

WHAT IS A GMO?

GMOs, or "genetically modified organisms," are plants or animals created through the gene splicing techniques of biotechnology (also called genetic engineering, or GE). This experimental technology merges DNA from different species, creating unstable combinations of plant, animal, bacterial and viral genes that cannot occur in nature or in traditional crossbreeding. GMOs have not been proven safe.

GMOINSIDE.ORG

print, fold & take with you



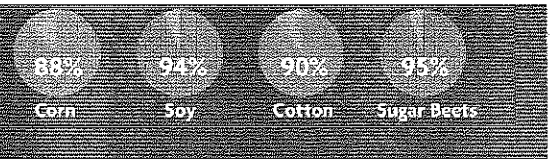
Did you know that soy infant formula is loaded with potential GMOs?

Corn Syrup Solids (39%), **Soy Protein Isolate** (15%), High Oleic Safflower Oil (11%), **Sugar** (10%), **Soy Oil** (8%), Coconut Oil (8%). Less than 2% of the following: C. Cohnii Oil, M. Alpina Oil, Beta-Carotene, Lutein, Lycopene, Fructooligosaccharides, Calcium Phosphate, Potassium Citrate, Potassium Chloride, Magnesium Chloride, Salt, **Ascorbic Acid**, **Choline Chloride**, L-Methionine, Taurine, Ascorbyl Palmitate, Ferrous Sulfate, **m-Inositol**, **Mixed Tocopherols**, Zinc Sulfate, **d-Alpha-Tocopheryl Acetate**, L-Carnitine, Niacinamide, Calcium Pantothenate, Cupric Sulfate, Thiamine Chloride Hydrochloride, **Vitamin A Palmitate**, Riboflavin, Pyridoxine Hydrochloride, Folic Acid, Potassium Iodide, Potassium Hydroxide, Phylloquinone, Biotin, Sodium Selenate, **Vitamin D3**, and Cyanocobalamin.

Common GMO ingredients are bold.

2011 PERCENTAGE OF COMMON GMO CROPS GROWN IN THE U.S.

(GMO = High Odds)



INFANT BABY FORMULA

Recipe makes 36 ounces

2 cups organic milk or certified clean raw milk or for non-whey formula substitute organic coconut milk, organic soy milk or organic pasteurized, non-homogenized piima milk.

1/4 cup homemade organic liquid whey

4 tablespoons lactose

1/4 teaspoon bifodobacterium infantis

2 tablespoons organic cream (not ultrapasteurized)

1 teaspoon high quality cod liver oil, hemp oil or flax oil

1 teaspoon unrefined organic sunflower oil

1 teaspoon organic extra virgin olive oil

2 teaspoons organic coconut oil

2 teaspoons non-GMO nutritional yeast

2 teaspoons non-GMO gelatin

1 7/8 cups filtered water

1/4 teaspoon non-GMO acerola powder

FOLD ALONG THIS LINE TO STORE THIS RECIPE

Add gelatin to water and heat gently until gelatin is dissolved. Place all ingredients in a blender and blend well.

To serve, pour 6 to 8 ounces into a sterilized glass bottle, attach BPA-free and phthalate-free nipple and set in a pan of simmering water. Test for drinkable temperature on wrist (after shaking milk and before feeding to baby).

For more information on this recipe or non-GMO sources please visit us at GMOinside.org.

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Background Paper on the Labelling of Foods Obtained Through Certain Techniques of Genetic Modification/Genetic Engineering
Outline

I. Introduction

II. Issues relevant to the labelling of GM/GE foods

A. Presence of allergens
B. Significant differences in composition, characteristics, nutritional properties, or intended use
C. Protect consumers from false and misleading labelling information
D. Labelling related to consumer preferences

III. Existing Codex labelling texts that can be applied to address above issues

A. Presence of allergens
- Codex General Standard for the Labelling of Prepackaged Foods

B. Significant differences in composition, characteristics, nutritional properties, or intended use
- Codex General Standard for the Labelling of Prepackaged Foods
- Codex Guidelines for Use of Nutrition and Health Claims

C. Protect consumers from false and misleading labelling information
- Codex General Standard for the Labelling of Prepackaged Foods
- Codex General Guidelines on Claims

D. Labelling related to consumer preferences
- Codex General Standard for the Labelling of Prepackaged Foods
- Codex General Guidelines on Claims

IV. Other relevant existing Codex and FAO/WHO texts

A. Codex Principles for Risk Analysis and Guidelines for Safety Assessment of Foods Derived from Modern Biotechnology
B. FAO and WHO reports related to safety aspects of foods derived from modern biotechnology

V. Frequently raised questions about the labelling of GM/GE foods

Table 1. Provisions in existing Codex labelling texts that can be applied to the labelling of GM/GE foods

Annex 1. Relevant Provisions of the Codex Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997, Rev. 1-2004)

I. Introduction

At the 35th Session of the Codex Committee on Food Labelling (CCFL), the Committee agreed to establish a physical working group to continue discussions, under agreed-upon terms of reference, on the agenda item related to the labelling of food and food ingredients obtained through certain techniques of genetic modification/genetic engineering (GM/GE). The Committee also agreed that this Working Group, which is scheduled to meet in Ghana in early 2008, will take into account, among other documents, an informative background paper to be prepared by the United States, Canada, and Nigeria on how current Codex texts relate to the labelling of food and food ingredients obtained through certain techniques of genetic modification/genetic engineering (ALINORM 07/30/22, paras. 117 and 118). Accordingly, the United States, Canada, and Nigeria have prepared this paper.

In addressing how current Codex texts relate to the labelling of GM/GE foods and food ingredients, we have addressed issues that have come before CCFL on this subject. We reviewed food labelling and other relevant Codex texts and FAO/WHO reports and have attempted to explain specific provisions and guidance available in Codex texts that relate to the issues raised by Member Countries. It is important to note that labelling of a food is considered only after the food has undergone appropriate assessments to deem it safe for human consumption. Codex has adopted several texts which address the safety aspects of GM/GE foods and are available to Member Countries for this purpose.

Section II of this paper introduces various issues that Member Countries have identified in discussions about the labelling of foods and food ingredients derived through certain techniques of GM/GE (also referred to as "modern biotechnology" in this paper). In section III, provisions in existing Codex labelling texts that can be applied to address each of the issues identified in section II are presented and explained. Section IV of the paper lists other existing Codex texts and FAO and WHO reports relevant to the safety aspects of GM/GE foods. Finally, section V provides information from Sections III and IV in a concise format for easy reference through the use of frequently raised questions and answers.

II. Issues relevant to the labelling of GM/GE foods

At previous CCFL Sessions and Working Group meetings, Member Countries have identified various issues in relation to the labelling of foods derived through modern biotechnology[1]. Major issues include: presences of allergens; significant differences in composition, characteristics, nutritional properties, or intended use; protect consumers from false or misleading labelling information; and labelling related to consumer preferences. The following sections discuss each issue and links existing Codex text which addresses the issue.

[1] We have attempted to focus on the major concerns that were expressed by Member Countries; the issues identified in this section are not intended to be representative of all of the concerns that were expressed.

A. Presence of allergens

A significant concern that Member Countries have expressed in relation to the labelling of foods derived through modern biotechnology is the potential for the GM/GE technology to introduce new allergens or alter the levels of existing allergens. Some Member Countries have indicated that GM/GE foods should undergo a comprehensive safety assessment, including assessment for potential allergenicity, to determine the safety and marketability of the food. Countries have also stated that the labelling of any marketed GM/GE food that contains a new allergen or altered allergenicity must disclose the presence of the allergen or the change in allergenicity to help ensure the safe and appropriate use of the food and facilitate informed choices by consumers.

B. Significant differences in composition, characteristics, nutritional properties, or intended use

Foods derived through modern biotechnology may have significantly altered physical, chemical, or functional characteristics compared to their conventional counterparts that consumers need to be aware of. Similarly, the nutritional properties of a food may be enhanced through the use of modern biotechnology techniques. Several Member Countries have stated that when such changes are significant to the basic identity or essential characteristics of a food where the traditional (common) name of the food no longer adequately describes the food, a modified common name is necessary to appropriately describe the food. In other instances, the altered functionality may need to be disclosed in other labelling of the food to ensure that consumers are informed about the appropriate use of the food.

C. Protect consumers from false and misleading labelling information

Another issue raised in discussions related to the labelling of GM/GE foods is the protection of consumers against false and misleading labelling statements. Countries have expressed the need to ensure that consumers are protected against fraud, deception, and unsubstantiated claims in the marketplace. False and misleading labelling may relate to safety, significant compositional or nutritional characteristics, or economic value of the food.

D. Labelling related to consumer preferences

An issue frequently raised in the discussion of the labelling of GM/GE foods is responding to consumer demand for certain types of information and consumer right to know about the food they purchase based on personal preferences. Member Countries have expressed the need for labelling of GM/GE foods to satisfy consumer demand and/or facilitate purchasing decisions consistent with consumer preferences. Countries also stated that labelling provisions do not replace the need for a thorough review of safety of these foods; rather, the labelling provisions are in addition to the safety review and are primarily intended to respond to demands or desires of their consumers for such information.

III. Existing Codex labelling texts that can be applied to address above issues

A careful review of existing Codex labelling texts reveals that existing Codex texts contain several provisions that address each of the issues identified above. Specifically, the Codex *General Standard for the Labelling of Prepackaged Foods* (Codex Stan 1-1985 (Rev. 1-1991), the Codex *General Guidelines on Claims* (CAC/GL 1-1979, Rev. 1-1991), and the Codex *Guidelines for Use of Nutrition and Health Claims* (CAC/GL 23-1997, Rev.1-2004) provide direction and guidance on mandatory and voluntary labelling of foods in general and apply equally to foods derived through modern biotechnology (See Table 1 of this paper). These existing provisions should be examined and issues/elements specific to GM/GE foods that may not be adequately addressed in these existing texts should be identified prior to determining the need for developing additional labelling principles specific to GM/GE foods.

A. Presence of allergens

The existing General Standard for the Labelling of Prepackaged Foods includes specific recommendations for the labelling of foods derived through modern biotechnology when such foods contain allergenic proteins.

Section 4.2.2 The presence in any food or food ingredients obtained through biotechnology of an allergen transferred from any of the products listed in section 4.2.1.4[2] shall be declared.

When it is not possible to provide adequate information on the presence of an allergen through labelling, the food containing the allergen should not be marketed.

Consistent with these provisions, the introduction of an allergenic protein into a food derived through modern biotechnology must be declared. In addition, when there is not sufficient assurance of safe use through label declaration of the presence of the allergen, these provisions recommend that the food should not be marketed. When the use of modern biotechnology results in the presence of a new allergenic protein in a food, consistent with Section 4.2.2, in most cases such foods would not be allowed on the market because of the inherent difficulty of ensuring proper and adequate labelling to inform consumers, particularly in the case of unpackaged foods and commodities. However, where there is sufficient assurance that labelling would adequately inform consumers about the safe use of the food, per Section 4.2.2, the labelling of the GM/GE food must disclose the presence of the allergen to help ensure safe and appropriate use of the food.

[2] Section 4.2.1.4 reads: "The following foods and ingredients are known to cause hypersensitivity and shall always be declared: Cereals containing gluten; i.e., wheat, rye, barley, oats, spelt or their hybridized strains and products of these; Crustacea and products of these; Eggs and egg products; Fish and fish products; Peanuts, soybeans and products of these; Milk and milk products (lactose included); Tree nuts and nut products; and Sulphite in concentrations of 10 mg/kg or more."

In addition to these labelling guidelines, the Codex Guidelines for Safety Assessment of Foods Derived from Modern Biotechnology include guidance with respect to the assessment of possible allergenicity of these foods. Specifically, paragraph 43 of the Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants (CAC/GL 45-2003) states that the "transfer of genes from commonly allergenic foods . . . should be avoided unless it is documented that the transferred gene does not code for an allergen . . ." These safety guidelines make no distinction between a food that is sold in prepackaged form or in another form and, accordingly, apply to all GM/GE foods, whether in prepackaged form or unpackaged and sold in non-retail containers.

B. Significant differences in composition, characteristics, nutritional properties, or intended use

Existing Codex labelling texts provide direction on the labelling of GM/GE foods that have significantly modified composition, characteristics, nutritional properties, or intended use. Specifically, sections 3.1, 3.2, 4.1.1, and 4.1.2 of the General Standard for the Labelling of Prepackaged Foods can be applied to determine the appropriate name of the food and any other additional labelling statements that may be required to inform consumers of the modified attributes of the GM/GE food.

Section 3.1 Prepackaged food shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect[3].

Section 3.2 Prepackaged food shall not be described or presented on any label or in any labelling by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the purchaser or consumer to suppose that the food is connected with such other product.

The overarching General Principles in sections 3.1 and 3.2 *require* all prepackaged foods, which includes those obtained through modern biotechnology, to be described or presented in a manner that is truthful and non-misleading. In addition, these principles do not permit foods to be described or presented in a manner that is likely to create an erroneous impression regarding its character in any respect or is likely to be confused with another similar product. Consistent with these principles, when the physical, chemical, or functional characteristics of a food are altered through any means (production or processing), the labelling of such food must be appropriately modified from its traditional labelling to ensure that the food is described or presented in a manner that is truthful and not misleading and not likely to create an erroneous impression regarding its character in any respect.

[3] Footnote to Section 3.1 reads: "Examples of descriptions or presentations to which these General Principles refer are given in the Codex General Guidelines on Claims."

Section 4.1.1[4] The name [of the food] shall indicate the true nature of the food and normally be specific and not generic.

Section 4.1.2 There shall appear on the label either in conjunction with, or in close proximity to, the name of the food, such additional words or phrases as necessary to avoid misleading or confusing the consumer in regard to the true nature and physical condition of the food including but not limited to the type of packaging medium, style, and the condition or type of treatment it has undergone; for example, dried, concentrated, reconstituted, smoked.

Similarly, the *mandatory* labelling provisions regarding the name of the food in sections 4.1.1 and 4.1.2 require all prepackaged foods, which includes those obtained through modern biotechnology, to be identified by a name and any qualifying words that accurately and adequately describe the true nature of the food and avoid misleading or confusing the consumer. Consistent with these provisions, when the physical, chemical, or functional characteristics of a food are significantly altered through any means (production or processing), the traditional name of such food may need to be changed or qualified with additional words or phrases to describe the true nature of the food and to avoid misleading or confusing the consumer. Such labelling ensures that consumers are adequately informed about the characteristics of the food, thereby, enabling informed choices based on personal nutritional and health needs and use of the food.

In addition to these mandatory provisions, Codex labelling texts provide other guidelines for the voluntary[5] use of specific descriptors and claims to describe the altered nutritional properties of a food compared to its conventional counterpart. In cases where GM/GE modifications result in a claim related to the nutritional properties of the food, the claim language should be consistent with the Guidelines for Use of Nutrition and Health Claims. These guidelines for the voluntary use of nutrient content and nutrient comparative claims to highlight specific nutritional properties of a food apply to all foods in general, including those obtained through modern biotechnology. In addition, as a supplement to the General Guidelines on Claims, these guidelines ensure that such nutrient content claims and descriptors are used in a manner that is truthful, not misleading, and not likely to create an erroneous impression about the characteristics of the food. For convenient reference, the relevant provisions of these Guidelines are provided in Annex 1 of this paper.

An example of naming of food obtained through modern biotechnology that is consistent with Codex labelling principles and provisions is "high-oleic acid soybean oil." "High-oleic acid soybean oil" is produced from new soybean varieties that are modified to produce significantly increased levels of oleic acid in the seed oil. Thus the traditional name of this food is qualified with additional words to point out that, as a result of its compositional change, its identity is different from its conventional counterpart.

[4] Sub-provisions within section 4.1.1 provide additional recommendations with respect to the name of a food.
[5] The Codex General Guidelines on Claims and the Codex Guidelines for Use of Nutrition and Health Claims use the term "should" in describing the provisions. In contrast, the mandatory provisions of the General Standard for the Labelling of Prepackaged Foods use the term "shall" in describing the labelling requirements.

C. Protect consumers from false and misleading labelling information

Codex labelling texts contain several provisions to protect consumers from false and misleading labelling information. In accordance with Codex provisions, the prepackaged food in the context of the entire label must be presented in a manner that is truthful, not misleading, and not likely to create an erroneous impression regarding its character in any respect. Thus, the provisions ensure that consumers are informed and protected against fraud, deception, and unsubstantiated product claims in the marketplace and fair market practices are maintained.

Codex mandatory provisions assure the dissemination of truthful and non-misleading information to consumers about safety and other significant characteristics of the food. Specifically, sections 3.1 and 3.2 General Standard for the Labelling of Prepackaged Foods direct that prepackaged foods shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect. Therefore, when the physical, chemical, or functional characteristics of a food are significantly altered, the labelling of such food must appropriately provide this information to consumers. In addition, as explained in III.A above, section 4.2.2 of the General Standard for the Labelling of Prepackaged Foods provides direction specifically for the labelling of foods derived through modern biotechnology when such foods contain allergens.

In addition to the above, Codex texts include provisions for voluntary labelling to be used as a means to provide consumers with clear, relevant, and accurate information so as to meet consumer and market needs. Existing texts also provide guidelines on how to ensure that such voluntary labelling statements do not conflict with the fundamental labelling principle, which prevents a food from being presented in a manner that is misleading or likely to create an erroneous impression regarding its character in any respect.

The following provisions regarding voluntary labelling in existing Codex texts[6] can be applied to determine the appropriateness of labelling statements related to GM/GE foods:

General Standard for the Labelling of Prepackaged Foods

Section 7.1 Optional labelling – Any information or pictorial device written, printed, or graphic matter may be displayed in labelling provided that it is not in conflict with the mandatory requirements of this standard and those relating to claims and deception given in section 3 – General Principles.

General Guidelines on Claims

Section 1.2 The principle on which the guidelines are based is that no food should be described or presented in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect.

[6] Note: The Codex Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems (CAC/GL 26-1997) includes "labelling integrity and claims" among the list of items that should be covered, as appropriate, in control programmes and operations in import and export inspection and certification systems (see paragraph 28 of the Guidelines).

Section 1.3	The person marketing the food should be able to justify the claims made.
Section 2	Definition – For the purpose of these guidelines, a claim is any representation which states, suggests, or implies that a food has particular characteristics relating to its origin, nutritional properties, nature, production, processing, composition or any other quality.
Section 3.3	Prohibited Claims – Claims which cannot be substantiated.
Section 3.5	Prohibited Claims – Claims which could give rise to doubt about the safety of similar food or which could arouse or exploit fear in the consumer.
Section 4.1	Potentially Misleading Claims – Meaningless claims including incomplete comparatives and superlatives.
Section 5.1 (iii)	Conditional Claims – Terms such as "natural," "pure," "fresh," "home made," "organically grown," and biologically grown" when they are used, should be in accordance with the national practices in the country where the food is sold. The use of these terms should be consistent with the prohibitions set out in Section 3.
Section 5.1 (v)	Conditional Claims – Claims that a food has special characteristics when all such foods have the same characteristics, if this fact is apparent in the claim.
Section 5.1 (vi)	Conditional Claims – Claims which highlight the absence or non-addition of particular substances to food may be used provided that they are not misleading and provided that the substance: (b) – is one which consumers would normally expect to find in the food; (d) – is one whose presence or addition is permitted in the food.

These provisions include extensive guidance with respect to the voluntary use of food labelling to communicate to consumers specific attributes relating to the food in a manner that is truthful, not misleading, and not likely to create an erroneous impression about the food. Section 7.1 of the General Standard for the Labelling of Prepackaged Foods permits appropriate optional labelling statements and the General Guidelines on Claims provides specific guidance related to such voluntary labelling statements. These guidelines can be applied to ensure proper labelling of foods derived through modern biotechnology, just as they can be applied to foods obtained through any other means. In addition, for the purposes of the General Guidelines on Claims, the definition of a "claim" includes references related to the production of a food and, therefore, the scope of those guidelines clearly encompasses any labelling statements specific to the method of production of a food. For example, the appropriateness of a voluntary labelling claim to inform consumers that a food is or is not produced using genetic engineering can be evaluated under the direction and guidance provided in existing Codex texts.

The provisions also specify conditions under which voluntary labelling claims are permitted or prohibited. Section 1.3 of the General Guidelines on Claims states that the manufacturer of a

food bearing a claim should be able to substantiate the claim, while Section 3.3 prohibits the use of claims that cannot be substantiated. Accordingly, a labelling statement to inform consumers that a food is or is not produced using genetic engineering should be substantiated. This should be done through appropriate and adequate documentation that demonstrates the accuracy of the statement. In the event that the claim cannot be substantiated, labelling is prohibited. Further, Section 3.5 of the General Guidelines on Claims prohibits the use of statements which could give rise to doubt about the safety of similar foods or which could arouse or exploit fear in the consumer. Accordingly, a statement to inform consumers about whether a food is or is not produced using genetic engineering would be prohibited under certain conditions, such as if the labelling statement led consumers to believe that the GM/GE food might be less safe than its conventional counterpart.

In Section 5.1, the General Guidelines on Claims provides conditions attached to the use of certain types of claims, which can be applied to voluntary labelling statements related to the method of production of foods obtained through modern biotechnology. For example, section 5.1(iii) provides that terms such as "natural," "pure," "fresh," "home made," "organically grown," and "biologically grown" when they are used, should be in accordance with the national practices in the country where the food is sold and that the use of these terms should be consistent with the prohibitions set out in Section 3. Labelling statements or terms to inform consumers that a food is or is not produced using genetic engineering can be viewed similarly. As another example, section 5.1(v) states that a claim that a food has special characteristics when all such foods have the same characteristics can be made provided this fact is apparent in the claim. For example, a claim that a food is not produced through genetic engineering may be misleading if no such foods in the marketplace are produced through genetic engineering. However, such a claim may be made provided this fact is apparent in the claim resulting in a truthful and non-misleading labelling statement (e.g., "like all [name of the food], this [name of the food] is not a product of genetic engineering").

D. Labelling related to consumer preferences

Codex labelling texts note that "food labelling is the primary means of communication between the producer and seller of food on one hand, and the purchaser and consumer on the other" (page iii, Preface, Codex Alimentarius Food Labelling Complete Texts, 4th edition, FAO/WHO, 2005). It is clear that a function of labelling is to inform consumers about the food that they purchase. The question that arises is whether the information presented in the labelling of a food should be required or permitted under certain conditions.

Codex does not base its mandatory labelling provisions on consumer demand alone. Codex reserves mandatory labelling for information specifically about the food itself and recommends that any additional voluntary labelling not be false, misleading or deceptive. Ultimately, however, the food--in the context of its labelling, examined in its entirety--must be presented in a manner that is truthful, not misleading, and not likely to create an erroneous impression regarding its character in any respect.

As explained in section C above, Codex labelling texts include several provisions to ensure that any voluntary statements made in the labelling of foods are truthful and not misleading or deceptive. These provisions can be applied to determine the appropriateness of labelling when used as a means to satisfy consumers' demand for certain information about the food they purchase and/or when used by marketers to indicate that a food meets certain consumer preferences. Specifically, Section 7.1 of the General Standard for the Labelling of Prepackaged Foods and Sections 1.2, 1.3, 2, 3.3, 3.5, 4.1, 5.1(iii), 5.1(v), 5.1(vi)(b), and 5.1(vi)(d) of the General Guidelines on Claims include guidance on optional labelling that can be applied to voluntary labelling statements used to respond to consumer demand for information about GM/GE foods based on personal preferences.

In addition, the Codex Alimentarius Commission and the Codex Executive Committee have provided guidance with respect to the labelling of foods derived through modern biotechnology, including the consideration of consumer right to know as a basis for labelling:

- In 1991, the Commission requested CCFL "to provide guidance on how the fact that a food was derived from modern biotechnologies could be made known to the consumers. The need to provide consumers with sound, scientifically based information which explained the application of biotechnology in food production and processing and clarified the safety issues was stressed." (ALINORM 91/40, paras. 90, 91).

- Further, in 1996, with respect to the labelling of GM/GE foods, the Executive Committee "stressed that the Four Statements of Principle [Concerning the Role of Science in the Codex Decision-making Process and the Extent to which Other Factors are taken into Account] should be closely adhered to. It noted the opinion claiming that while consumers may claim the right to know whether or not foods had been prepared by such means, it also noted that the claimed right to know was ill-defined and variable and in this respect could not be used by Codex as the primary basis of decision-making on appropriate labelling. The Executive Committee stated that there were certain elements which clearly had to be taken into account when considering the labelling of foods in relation to production processes. Foremost among these was the protection of consumers' health from any risks introduced by the production process, followed by consideration of any nutritional implications which resulted from changes to the composition of the food, by any significant technological changes in the properties of the food itself, and the prevention of deceptive trade practices. To a considerable extent such matters would have to be decided on a case-by-case basis. The Executive Committee noted that there was always the possibility of voluntary labelling." (ALINORM 97/3, para. 29).

IV. Other relevant existing Codex and FAO/WHO texts

Some Member Countries have expressed concerns with the safety of GM/GE foods and stated that modern biotechnology is a relatively new technology with many unknowns about its long term impact on human health. As such, these Member Countries state that due to these uncertainties concerning the safety of these foods, their consumers expect foods that are produced through GM/GE to be labeled to indicate their method of production.

Codex has adopted texts to ensure the protection of health of consumers and fair practices in international food trade; these texts apply to all foods, including GM/GE foods. For example, Codex developed several principles and guidelines on Food Import and Export Inspection and Certification Systems, which provide a framework for the development and operation of import and export inspection and certification systems consistent with a set of principles that ensure that foods, and their production systems, meet certain requirements necessary to protect consumers against food-borne hazards and deceptive marketing practices and to facilitate trade on the basis of accurate product description.

In addition, Codex has adopted several texts which address the safety assessment and risk analysis of GM/GE foods. The FAO and WHO also have published reports of studies and expert consultations which carefully reviewed safety aspects related to GM/GE foods. Listed below are some significant documents[7].

A. Codex Principles for Risk Analysis and Guidelines for Safety Assessment of Foods Derived from Modern Biotechnology

Principles for the Risk Analysis of Foods Derived from Modern Biotechnology (CAC/GL 44-2003) provides a framework for undertaking risk analysis on the safety and nutritional aspects of foods derived from modern biotechnology. These principles recommend that "a pre-market safety assessment should be undertaken following a structured and integrated approach and be performed on a case-by-case basis" (paragraph 12) and that "risk management measures may include, as appropriate, food labelling conditions for marketing approvals and post-market monitoring" (paragraph 19).

Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants (CAC/GL 45-2003), which is based on the Principles for the Risk Analysis of Foods Derived from Modern Biotechnology and addresses safety and nutritional aspects of foods consisting of, or derived from, plants that have a history of safe use as sources of food, and that have been modified by modern biotechnology to exhibit new or altered expression of traits. This guideline takes into account both intended and unintended effects and describes the recommended approach to undertake safety assessment of foods derived from recombinant-DNA plants where a conventional counterpart exists, and identifies data and information that are generally applicable to making such assessments. It also includes an annex outlining the assessment of possible allergenicity.

Guideline for the Conduct of Food Safety Assessment of Foods Produced Using Recombinant-DNA Microorganisms (CAC/GL 46-2003), which is also based on the Principles for the Risk Analysis of Foods Derived from Modern Biotechnology and addresses safety and nutritional aspects of foods produced through the actions of recombinant-DNA microorganisms. This Guideline describes the approaches recommended for undertaking safety assessments of foods

[7] This is not intended to be a comprehensive list of all Codex texts/guidelines relevant to the safety of GM/GE foods. Rather, it lists significant texts that directly address safety aspects of GM/GE foods. Other Codex texts related to food safety and food hygiene that apply to all foods in general are equally applicable to GM/GE foods.

produced using recombinant-DNA microorganisms, using comparison to a conventional counterpart. It also includes an annex outlining the assessment of possible allergenicity.

B. FAO and WHO reports related to safety aspects of foods derived from modern biotechnology

Report of a FAO/WHO Expert Consultation on the Safety Assessment of Foods Derived from Recombinant-DNA Animals (FAO/WHO, 2007), which built upon the conclusions and recommendations of the FAO/WHO Expert Consultation on the Safety Assessment of Foods Derived from Genetically Modified Animals, including Fish (FAO/WHO, 2003) and provided scientific advice with respect to marker and reporter genes and non-heritable applications.

Modern food biotechnology, human health and development: an evidence-based study (WHO, 2005), which provided the following conclusion, among others, with respect to the risk of GM foods to human health: "GM foods currently available on the international market have undergone risk assessments and are not likely to present risks for human health any more than their conventional counterparts. The risk-assessment guidelines specified by CAC are thought to be adequate for the safety assessment of GM foods currently on the international market."

Report of a FAO/WHO Expert Consultation on the Safety Assessment of Foods Derived from Genetically Modified Animals, including Fish (FAO/WHO, 2003), which concluded that "the food safety assessment of GM animals and derived products can largely be performed along the lines that have already been established for the evaluation of GM plants and derived produced on a case-by-case basis" and that "rigorous pre-market safety assessment of foods derived from GM animals should provide sufficient safety assurances."

Report of a Joint FAO/WHO Expert Consultation on Foods Derived from Biotechnology: Safety Assessment of Foods Derived from Genetically Modified Microorganisms (WHO/FAO, 2001), which concluded that "the safety assessment of GMMs [Genetically Modified Microorganisms] should proceed on a case-by-case basis aided by a series of well-defined questions." The Consultation also "confirmed that a comparative approach, using the concept of *substantial equivalence*, provided a practical means of identifying similarities and differences between food produced with the aid of GMMs and their appropriate comparators."

Report of a Joint FAO/WHO Expert Consultation on Allergenicity of Foods Derived from Biotechnology (FAO, 2001), which concluded that "the safety assessment of foods derived from biotechnology requires an integrated and stepwise, case-by-case approach, and that this method also be applied to the evaluation of the allergenicity of food derived from biotechnology" and "that all foods derived from biotechnology must be assessed for allergenic potential".

Report of a Joint FAO/WHO Expert Consultation on Foods Derived from Biotechnology: Safety Aspects of Genetically Modified Foods of Plant Origin (WHO, 2000), which concluded that "safety assessment of food and food ingredients obtained using recombinant-DNA techniques does not require new scientific principles or methodology. Similar principles for the assessment

of the safety and wholesomeness of the genetically modified foods should be applied as practiced for conventional food."

In addition, national scientific, authoritative bodies in several countries have conducted their own reviews and assessments and provided conclusions related to the safety aspects of GM/GE foods.

V. Frequently raised questions about the labelling of GM/GE foods

Q1. Do existing Codex labelling texts include guidance with respect to the labelling of GM/GE foods?

Existing Codex labelling texts that provide standards and guidelines for the labelling of foods apply equally to foods derived through modern biotechnology. In addition, the General Standard for the Labelling of Prepackaged Foods includes a provision specific to GM/GE foods (section 4.2.2) that requires the declaration of allergens transferred from certain foods and ingredients known to cause hypersensitivity when present in a GM/GE food.

Q2. If the GM/GE food is significantly different from its conventional counterpart, what do Codex labelling guidelines require with respect to the labelling of this food?

Sections 3.1 and 3.2 of the General Standard for the Labelling of Prepackaged Foods require all prepackaged foods, which includes those obtained through modern biotechnology, to be described or presented in a manner that is truthful and non-misleading. In addition, these principles do not permit foods to be described or presented in a manner that is likely to create an erroneous impression regarding its character in any respect or is likely to be confused with another similar product. Consistent with these principles, when the GM/GE food has physical, chemical, or functional characteristics that are significantly different compared to its conventional counterpart, the labelling of the GM/GE food must appropriately declare these differences to ensure that the food is described or presented in a manner that provides truthful and non-misleading information to consumers and is not likely to create an erroneous impression regarding its character in any respect.

Similarly, the mandatory labelling provisions regarding the name of the food in sections 4.1.1 and 4.1.2 require all prepackaged foods, which includes those obtained through modern biotechnology, to be identified by a name and any qualifying words that accurately and adequately describe the true nature of the food and avoid misleading or confusing the consumer. Consistent with these provisions, when the physical, chemical, or functional characteristics of the GM/GE food are significantly different compared to its conventional counterpart, the traditional name of such food may need to be changed or qualified with additional words or phrases to describe the true nature of the food and to avoid misleading or confusing the consumer.

Q3. If the GM/GE food contains an allergen, what do Codex labelling guidelines require with respect to the labelling of this food?

Section 4.2.2 of the General Standard for the Labelling of Prepackaged Foods provides direction specifically for the labelling of foods derived through modern biotechnology when such foods contain allergens. Consistent with this provision, the presence of certain new allergens in a GM/GE food must be declared in the labelling of that food. In addition, when there is not sufficient assurance of safe use through label declaration of the presence of the allergen, Section 4.2.2 recommends that the food should not be marketed.

In addition, the Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants (CAC/GL 45-2003) and the Guideline for the Conduct of Food Safety Assessment of Foods Produced Using Recombinant-DNA Microorganisms (CAC/GL 46-2003) include guidance specific to the assessment of possible allergenicity of GM/GE foods. Consistent with these guidelines, genes from commonly allergenic foods (such as those foods and ingredients listed under Section 4.2.1.4 of the Codex General Standard for the Labelling of Prepackaged Foods) should not be transferred unless it can be demonstrated that no allergen was transferred into the GM/GE food.

Q4. If the GM/GE food is not significantly different from its conventional counterpart, what do Codex labelling guidelines require with respect to the labelling of this food?

Codex labelling guidelines do not require additional labelling of GM/GE foods unless such foods are significantly different from their conventional counterparts (see Q2). However, Codex labelling guidelines include provisions for voluntary, truthful, and non-misleading labelling claims that can be used to evaluate the appropriateness of a GM/GE-related claim should a manufacturer choose to distinguish its product from other foods in the marketplace to satisfy certain consumer preferences. Specifically, section 7.1 of the General Standard for the Labelling of Prepackaged Foods and sections 1.2, 1.3, 2, 3.3, 3.5, 4.1, 5.1(iii), 5.1(v), 5.1(vi)(b), and 5.1(vi)(d) of the General Guidelines on Claims include the relevant provisions.

Q5. What types of GM/GE-related claims are permitted in the labelling of foods per Codex labelling guidelines?

While Codex has not adopted specific types of GM/GE-related claims that would be permitted in food labelling, any voluntary GM/GE-related labelling claim would be subject to the principles on voluntary labelling provided in existing Codex guidelines. Therefore, a GM/GE-related claim can be voluntarily made by manufacturers provided such claim is consistent with Section 7.1 of the General Standard for the Labelling of Prepackaged Foods and sections 1.2, 1.3, 2, 3.3, 3.5, 5.1(iii), and 5.1(v) of the General Guidelines on Claims. A voluntary GM/GE-related claim should be evaluated for its appropriateness according to these Codex provisions; for example:

- The claim is truthful and not misleading or deceptive;
- The claim is not likely to create an erroneous impression regarding its character in any respect;
- The person marketing the food should be able to justify the claim made;

- The claim is prohibited if it cannot be substantiated;
- The claim is prohibited if it could give rise to doubt about the safety of similar food or could arouse or exploit fear in the consumer;
- The claim should be in accordance with the national practices in the country where the food is sold; and
- If the claim suggests that the food has special characteristics when all such foods have the same characteristics, this fact should be apparent in the claim.

Q6. Do Codex guidelines include any criteria with respect to claims that describe modifications to the nutritional properties of a GM/GE food?

The Codex Guidelines for Use of Nutrition and Health Claims provides guidelines for the appropriate use of nutrition claims in the labelling of all foods in general, which includes those obtained through modern biotechnology. These guidelines can be used to determine the appropriateness of voluntary statements to describe the altered nutritional properties of a GM/GE food compared to its conventional counterpart. The guidelines include criteria that must be met for the voluntary use of specific nutrient content and nutrient comparative claims to highlight the modified nutritional property of a GM/GE food.

Q7. Do claims used in the labelling of GM/GE foods need to be substantiated? Do GM/GE-related claims in the labelling of non-GM/GE foods need to be substantiated?

Yes, section 1.3 of the General Guidelines on Claims state that the person marketing the food should be able to justify the claim made in the labelling of that food. Further, section 3.3 prohibits the use of a claim that cannot be substantiated. Similarly, a voluntary statement made in the labelling of a non-GM/GE food should be supportable, such as through appropriate and adequate documentation.

Q8. What guidance do Codex labelling texts offer with respect to claims about the method of production of a food, including a GM/GE food?

The General Guidelines on Claims state that for the purposes of the Guidelines, the definition of a "claim" includes references related to the production of a food. Therefore, the scope of these guidelines clearly encompasses any labelling statements related to the method of production of a food, including GM/GE foods. The appropriateness of a voluntary labelling statement to inform consumers that a food is or is not produced using GM/GE should be evaluated under the direction and guidance provided in these Guidelines (see Q5).

The Codex Committee on Food Labelling has previously considered method-of-production labelling provisions, in areas other than GM/GE labelling, to respond to consumers' desire for specific information about a food and to facilitate fair trade practices. However, such considerations involved industry voluntary, not government mandatory, labelling provisions. For example, Codex has adopted guidelines for voluntary method-of-production labelling terms such as "Halal" and "Organic."

Q9. What guidance does Codex provide with respect to the use of food labelling simply to respond to consumer demand for information? How can the fact that a food is or is not derived from modern biotechnology be made known to the consumer?

Codex does not base its mandatory labelling provisions on consumer demand alone. Codex reserves mandatory labelling for information specifically about the food itself and recommends that any additional voluntary labelling not be false, misleading or deceptive.

Codex mandatory labelling provisions ensure that consumers are adequately informed to enable safe and appropriate use of the food. Section 4.2.2 of the General Standard for the Labelling of Prepackaged Foods directs that the introduction of an allergenic protein into a food derived through modern biotechnology must be declared. When there is not sufficient assurance that labelling would adequately inform consumers about the safe use of the food, these provisions recommend that the food should not be marketed. In addition, existing Codex texts provide direction on the labelling of GM/GE foods that have significantly modified composition, characteristics, nutritional properties, or intended use. Specifically, sections 3.1, 3.2, 4.1.1, and 4.1.2 of the General Standard for the Labelling of Prepackaged Foods can be applied to determine the appropriate name of the food and any other additional labelling statements that may be required to inform consumers of the modified attributes of the GM/GE food. These mandatory provisions assure the dissemination of truthful and non-misleading information to consumers about safety and other significant characteristics of the food, thereby, enabling informed choices by consumers based on their own nutritional and health needs and use of the food.

Codex texts also include provisions for voluntary labelling to be used as a means to provide consumers with clear, relevant, and accurate information so as to meet consumer and market needs that are based on personal preferences. Existing texts provide guidance on how to ensure that such voluntary labelling statements do not conflict with the fundamental labelling principle, which prevents a food from being presented in a manner that is misleading or likely to create an erroneous impression regarding its character in any respect. Thus, consumers are protected against fraud, deception, and unsubstantiated product claims in the marketplace and fair market practices are ensured. These voluntary labelling provisions can be applied to determine the appropriateness of labelling when used as a means to respond to consumer demand for certain information or to enable marketers to indicate that a food meets certain consumer preferences (see Q2, Q3, Q4 and Q5).

In addition, the Codex Alimentarius Commission and the Codex Executive Committee have provided guidance with respect to the labelling of foods derived through modern biotechnology, including the consideration of consumer right to know as a basis for labelling:

- In 1991, the Commission requested CCFL "to provide guidance on how the fact that a food was derived from modern biotechnologies could be made known to the consumers. The need to provide consumers with sound, scientifically based information which explained the

application of biotechnology in food production and processing and clarified the safety issues was stressed." (ALINORM 91/40, paras. 90, 91).

- Further, in 1996, with respect to the labelling of GM/GE foods, the Executive Committee "stressed that the Four Statements of Principle [Concerning the Role of Science in the Codex Decision-making Process and the Extent to which Other Factors are taken into Account] should be closely adhered to. It noted the opinion claiming that while consumers may claim the right to know whether or not foods had been prepared by such means, it also noted that the claimed right to know was ill-defined and variable and in this respect could not be used by Codex as the primary basis of decision-making on appropriate labelling. The Executive Committee stated that there were certain elements which clearly had to be taken into account when considering the labelling of foods in relation to production processes. Foremost among these was the protection of consumers' health from any risks introduced by the production process, followed by consideration of any nutritional implications which resulted from changes to the composition of the food, by any significant technological changes in the properties of the food itself, and the prevention of deceptive trade practices. To a considerable extent such matters would have to be decided on a case-by-case basis. The Executive Committee noted that there was always the possibility of voluntary labelling." (ALINORM 97/3, para. 29).

Q10. Do Codex labelling texts provide guidance on labelling related to religious preferences?

Existing Codex texts address the use of voluntary labelling statements related to consumers' religious preferences. Specifically, section 5.1 of the Codex General Guidelines on Claims states: "Religious or Ritual Preparation (e.g. Halal, Kosher) of a food may be claimed provided that the food conforms to the requirements of the appropriate religious or ritual authorities." In addition, the Codex General Guidelines for Use of the Term "Halal" (CAC/GL 24-1997) provide specific guidelines for the use of the term "halal" in the labelling of foods. The latter set of guidelines supplement the General Guidelines on Claims and do not supersede any prohibitions contained within those guidelines. These sets of guidelines ensure that voluntary labelling statements related to religious preferences are appropriate and justified and consumers are protected against false, misleading, or deceptive claims, thereby, ensuring fair trade practices.

For consumers interested in foods that meet certain religious requirements, labelling statements that simply state whether a food is or is not produced using GM/GE do not provide any information about the religious acceptability of the food or the presence or absence of ingredients derived from sources considered unacceptable under certain religious preferences. It might be more appropriate to address these concerns through the use of voluntary labelling terms that address specific religious requirements or preferences. As noted above, any voluntary labelling statement, however, should conform to the guidelines provided in the Codex labeling texts (see Q5 and Q8).

Q11. Do Codex labelling guidelines address the safety of GM/GE foods?

Food labelling is the primary means of communication between the producer and seller of food on the one hand and the purchaser and consumer on the other. Foods in the marketplace should be deemed to be safe. Unsafe foods should not be marketed. For additional assurance of safe use of a food, food labelling can be employed to inform consumers of the appropriate use of the food. However, labelling is not a mechanism to bypass safety requirements.

Codex has adopted several texts that specifically address the safety aspects of GM/GE foods. The Codex Principles for Risk Analysis and Guidelines for Safety Assessment of Foods Derived from Modern Biotechnology include:

> Principles for the Risk Analysis of Foods Derived from Modern Biotechnology (CAC/GL 44-2003), whose purpose is to provide a framework for undertaking risk analysis on the safety and nutritional aspects of foods derived from modern biotechnology. These principles recommend that "a pre-market safety assessment should be undertaken following a structured and integrated approach and be performed on a case-by-case basis" (paragraph 12) and that "risk management measures may include, as appropriate, food labelling conditions for marketing approvals and post-market monitoring" (paragraph 19).
>
> Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants (CAC/GL 45-2003), which addresses safety and nutritional aspects of plant foods derived from modern biotechnology. This Guidelines takes into account both intended and unintended effects and describes that recommended approach to undertake safety assessment of foods derived from recombinant-DNA plants where a conventional counterpart exists, and identifies data and information that are generally applicable to making such assessments. It also includes an annex outlining the assessment of possible allergenicity.
>
> Guideline for the Conduct of Food Safety Assessment of Foods Produced Using Recombinant-DNA Microorganisms (CAC/GL 46-2003), which addresses safety and nutritional aspects of foods produced through the actions of recombinant-DNA microorganisms. This Guideline describes the approaches recommended for undertaking safety assessments of foods produced using recombinant-DNA microorganisms, using comparison to a conventional counterpart. It also includes an annex outlining the assessment of possible allergenicity.

Consistent with the recommendations in these Guidelines, genes from commonly allergenic foods (such as those foods and ingredients listed under Section 4.2.1.4 of the Codex General Standard for the Labelling of Prepackaged Foods) should not be transferred unless it can be demonstrated that no allergen was transferred into the GM/GE food.

Moreover, where the use of GM/GE results in the presence of a substance known to cause hypersensitivity, Codex labelling texts provide specific direction with respect to the labelling of

the GM/GE food. Section 4.2.2 of the General Standard for the Labelling of Prepackaged Foods requires the declaration of the presence of an allergen in a GM/GE food in the labelling of that food. Importantly, when there is not sufficient assurance of safe use through label declaration of the presence of the allergen, Section 4.2.2 recommends that the food should not be marketed.

Q12. Do Codex labelling and other guidelines apply to GM/GE foods that may be sold unpackaged in non-retail containers?

The Codex General Standard for the Labelling of Prepackaged Foods applies to all prepackaged foods to be offered as such to the consumer or for catering purposes in restaurants, canteens, schools, hospitals, and other such institutions where food is offered for immediate consumption. Labelling means "any written, printed or graphic matter that is present on the label, accompanies the food, or is displayed near the food, including that for the purpose of promoting its sale or disposal." The Codex General Guidelines on Claims are based on the principle that "no food should be described or presented in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect" (See Q2, Q3, Q4, and Q5).

Codex commodity standards for various individual foods and food products include provisions on food labelling that are specific to that food. These standards include, by reference, the Codex General Standard for the Labelling of Prepackaged Foods. In addition, where the scope of the individual Codex commodity standard is not limited to prepackaged foods, provisions for the labelling of non-retail containers are included within the commodity standard.

Furthermore, Codex texts related to food safety and food hygiene apply to all foods whether prepackaged or unpackaged. Codex has adopted several texts that specifically address the safety aspects of GM/GE foods, such as the Codex Principles for Risk Analysis and Guidelines for Safety Assessment of Foods Derived from Modern Biotechnology (See Q11) that apply equally to prepackaged and unpackaged forms of the food. Consistent with the recommendations in these Guidelines, genes from commonly allergenic foods should not be transferred unless it can be demonstrated that no allergen was transferred into the GM/GE food. These safety guidelines make no distinction between a food that is sold in prepackaged form or in unpackaged form.

In addition, Codex developed several guidance documents on Food Import and Export Inspection and Certification Systems that ensure that foods, and their production systems, meet certain requirements necessary to protect consumers against food-borne hazards and deceptive marketing practices and to facilitate trade on the basis of accurate product description. These principles and guidelines apply to all foods, which includes GM/GE foods, whether prepackaged or unpackaged sold in non-retail containers.

Table 1. Provisions in existing Codex labelling texts that can be applied to the labelling of GM/GE foods

Section	Mandatory Labelling Provisions	Application to labelling of GM/GE foods
General Standard for the Labelling of Prepackaged Foods		
3.1	Prepackaged food shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect.	Labelling of all prepackaged foods, which includes those obtained through GM/GE, must be consistent with these principles.
3.2	Prepackaged food shall not be described or presented on any label or in any labelling by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the purchaser or consumer to suppose that the food is connected with such other product.	
4.1.1	The name [of the food] shall indicate the true nature of the food and normally be specific and not generic.	Where GM/GE results in a significant difference in the attributes of the food, this principle requires appropriate mandatory labelling to accurately reflect the basic nature and characteristics of the food. The following circumstances would be covered under sections 3.1, 3.2, 4.1.1 and 4.1.2: - Significant difference from the conventional counterpart such that the traditional name does not sufficiently describe the food - Significant difference in the intended use of the GM/GE food - Significant difference in nutritional properties of the GM/GE food
4.1.2	There shall appear on the label either in conjunction with, or in close proximity to, the name of the food, such additional words or phrases as necessary to avoid misleading or confusing the consumer in regard to the true nature and physical condition of the food including but not limited to the type of packaging medium, style, and the condition or type of treatment it has undergone; for example, dried, concentrated, reconstituted, smoked.	
4.2.2	The presence in any food or food ingredients obtained through biotechnology of an allergen transferred from any of the products listed in section 4.2.1.4 shall be declared. When it is not possible to provide adequate information on the presence of an allergen through labelling, the food containing the allergen should not be marketed.	Safety-related labelling of GM/GE foods is addressed through this provision Allergens introduced or present in a GM/GE food must be declared in the labelling of that food.

Table 1 (cont'd). Provisions in existing Codex labelling texts that can be applied to the labelling of GM/GE foods

Section	Voluntary Labelling Provisions	Application to labelling of GM/GE foods
General Standard for the Labelling of Prepackaged Foods		
7.1	Optional labelling – Any information or pictorial device written, printed, or graphic matter may be displayed in labelling provided that it is not in conflict with the mandatory requirements of this standard and those relating to claims and deception given in section 3 – General Principles.	This provision applies to voluntary statements used in the labelling of all prepackaged foods, which includes those obtained through GM/GE
General Guidelines on Claims		
1.2	The principle on which the guidelines are based is that no food should be described or presented in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect.	A GM/GE-related claim can be voluntarily made by manufacturers provided such labelling is consistent with this principle
1.3	The person marketing the food should be able to justify the claims made.	The marketer of a food bearing a voluntary GM/GE-related claim should be able to substantiate the claim, such as through appropriate and adequate documentation
2	Definition – For the purpose of these guidelines, a claim is any representation which states, suggests, or implies that a food has particular characteristics relating to its origin, nutritional properties, nature, production, processing, composition or any other quality.	This definition explicitly provides that voluntary statements and descriptors related to the method of production of a food are within the scope of these guidelines
3.3	Prohibited claims – Claims which cannot be substantiated.	A voluntary GM/GE-related claim that cannot be substantiated is prohibited
3.5	Prohibited claims – Claims which could give rise to doubt about the safety of similar food or which could arouse or exploit fear in the consumer.	A voluntary GM/GE-related claim that could arouse or exploit fear or could give rise to doubt of the safety of the food among consumers is prohibited
4.1	Potentially misleading claims – Meaningless claims including incomplete comparatives and superlatives.	A voluntary GM/GE-related claim that includes incomplete comparatives or superlatives may be misleading
5.1(iii)	Conditional claims – Terms such as "natural," "pure," "fresh," "home made," "organically grown," and "biologically grown" when they are used, should be in accordance with the national practices in the country where the food is sold. The use of these terms should be consistent with the prohibitions set out in Section 3.	A voluntary GM/GE-related claim could be viewed similarly and used under the conditions specified in this provision
5.1(v)	Conditional claims – Claims that a food has special characteristics when all such foods have the same characteristics, if this fact is apparent in the claim.	A voluntary GM/GE-related claim may be made under the conditions specified in this provision

Table 1 (cont'd). Provisions in existing Codex labelling texts that can be applied to the labelling of GM/GE foods

Section	Voluntary Labelling Provisions	Application to labelling of GM/GE foods
5.1 (vi)	Conditional claims – Claims which highlight the absence or non-addition of particular substances to food may be used provided that they are not misleading and provided that the substance: (b) is one which consumers would normally expect to find in the food; (d) is one whose presence or addition is permitted in the food.	A voluntary GM/GE-related claim may be made under the conditions specified in this provision
Guidelines for Use of Nutrition and Health Claims (See Annex 1 of this paper)		These guidelines can be applied to the voluntary use of nutrient content and nutrient comparative claims in the labelling of all foods, including GM/GE foods

Annex 1. Relevant Provisions of the Codex Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997, Rev. 1-2004)

Introductory paragraph

Nutrition claims should be consistent with national nutrition policy and support that policy. Only nutrition claims that support national nutrition policy should be allowed.

Section 1.1 These guidelines relate to the use of nutrition and health claims in food labelling and, where required by the authorities having jurisdiction, in advertising.

Section 1.2 These guidelines apply to all foods for which nutrition and health claims are made without prejudice to specific provisions under Codex standards or Guidelines relating to Foods for Special Dietary Uses and Foods for Special Medical Purposes.

Section 1.3 These guidelines are intended to supplement the Codex General Guidelines on Claims and do not supersede any prohibitions contained therein.

Section 1.4 Nutrition and health claims shall not be permitted for foods for infants and young children except where specifically provided for in relevant Codex standards or national legislation.

DEFINITIONS

Section 2.1 ***Nutrition claim*** means any representation which states, suggests or implies that a food has particular nutritional properties including but not limited to the energy value and to the content of protein, fat and carbohydrates, as well as the content of vitamins and minerals. The following do not constitute nutrition claims:

(a) the mention of substances in the list of ingredients;

(b) the mention of nutrients as a mandatory part of nutrition labelling;

(c) quantitative or qualitative declaration of certain nutrients or ingredients on the label if required by national legislation.

Section 2.1.1 ***Nutrient content claim*** is a nutrition claim that describes the level of a nutrient contained in a food.
(Examples: "source of calcium"; "high in fibre and low in fat".)

Section 2.1.2 ***Nutrient Comparative claim*** is a claim that compares the nutrient levels and/or energy value of two or more foods.
(Examples: "reduced"; "less than"; "fewer"; "increased"; "more than".)

Section 4 ***NUTRITION CLAIMS***

Section 4.1 The only nutrition claims permitted shall be those relating to energy, protein, carbohydrate, and fat and components thereof, fibre, sodium and vitamins and

minerals for which Nutrient Reference Values (NRVs) have been laid down in the Codex Guidelines for Nutrition Labelling.

Section 5 ***NUTRIENT CONTENT CLAIMS***

Section 5.1 When a nutrient content claim that is listed in the Table to these Guidelines or a synonymous claim is made, the conditions specified in the Table for that claim should apply.

Section 5.2 Where a food is by its nature low in or free of the nutrient that is the subject of the claim, the term describing the level of the nutrient should not immediately precede the name of the food but should be in the form "a low (naming the nutrient) food" or "a (naming the nutrient)-free food".

Section 6 ***COMPARATIVE CLAIMS***

Comparative claims should be permitted subject to the following conditions and based on the food as sold, taking into account further preparation required for consumption according to the instructions for use on the label:

Section 6.1 The foods being compared should be different versions of the same food or similar foods. The foods being compared should be clearly identified.

Section 6.2 A statement of the amount of difference in the energy value or nutrient content should be given. The following information should appear in close proximity to the comparative claim:

6.2.1 The amount of difference related to the same quantity, expressed as a percentage, fraction, or an absolute amount. Full details of the comparison should be given.

6.2.2 The identity of the food(s) to which the food is being compared. The food(s) should be described in such a manner that it (they) can be readily identified by consumers.

Section 6.3 The comparison should be based on a relative difference of at least 25% in the energy value or nutrient content, except for micronutrients where a 10% difference in the NRV would be acceptable, between the compared foods and a minimum absolute difference in the energy value or nutrient content equivalent to the figure defined as "low" or as a "source" in the Table to these Guidelines.

Section 6.4 The use of the word "light" should follow the same criteria as for "reduced" and include an indication of the characteristics which make the food "light".

Category	Authors	Year
General	Ankilam E,Heinze P,Kay S,Van den Eede G,Popping B	2002
General	Dale PJ,Clarke B,Fontes EMG	2002
General	Gaugitsch H	2002
General	Helmut G	2002
General	Hötzel MJ	2002
General	Huang J,Rozelle S,Pray C,Wang Q	2002
General	Keith T A	2002
General	Koivisto RA,Törmäkangas KM,Kauppinen VS	2002
General	Lack G	2002
General	Lessick M,Keithley J,Swanson B,Lemon B	2002
General	Magnusson MK,Koivisto Hursti U-K	2002
General	Marvier M	2002
General	Pray CE,Huang J,Hu R,Rozelle S	2002
General	Rowland IR	2002
General	Schilter B,Constable A	2002
General	Shelton AM,Zhao JZ,Roush RT	2002
General	Brown JL,Ping Y	2003
General	Conner AJ,Glare TR,Nap JP	2003
General	Frewer LJ,Scholderer J,Bredahl L	2003
General	Gewin V	2003
General	Hancock JF	2003
General	Nap JP,Metz PLJ,Escaler M,Conner AJ	2003
General	Qaim M,Zilberman D	2003
General	Wilkinson MJ,Sweet J,Poppy GM	2003
General	Andow DA,Hilbeck A	2004
General	Frewer L,Lassen J,Kettlitz B,Scholderer J,Beekman V,Be	2004
General	Gaskell G,Allum N,Wagner W,Kronberger N,Torgersen I	2004
General	Goodyear KL,on behalf of the Defra Antimicrobial Resist	2004
General	Heinemann JA,Sparrow AD,Traavik T	2004
General	Ilsi	2004
General	Jaffe G	2004
General	König A,Cockburn A,Crevel RWR,Debruyne E,Grafstroe	2004
General	Kuiper HA,König A,Kleter GA,Hammes WP,Knudsen I	2004
General	Pilson D,Prendeville HR	2004
General	Celec P,Kukučková M,Renczésová V,Natarajan S,Pálffy	2005
General	Cleveland DA,Soleri D	2005
General	Goldstein Da,Tinland B,Gilbertson La,Staub Jm,Bannon	2005
General	John H	2005
General	Schmidt CW	2005
General	Velkov VV,Medvinsky AB,Sokolov MS,Marchenko AI	2005
General	Weil JH	2005
General	Alvarez-Morales A	2006
General	Andow DA,Zwahlen C	2006
General	Bigler F	2006
General	Chapman MA,Burke JM	2006
General	Efsa	2006
General	Efsa	2011
General	Frison EA,Smith IF,Johns T,Cherfas J,Eyzaguirre PB	2006
General	Haslberger AG	2006
General	Hill R,Sendashonga C	2006
General	Huang J,Qiu H,Bai J,Pray C	2006
General	Lentini Z	2006
General	Margulis C	2006
General	McCammon SL	2006
General	Quemada H	2006
General	Sanvido O,Widmer F,Winzeler M,Bigler F	2006
General	Schiemann J	2006
General	Schouten HJ,Jacobsen E	2006

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General	Singh OV,Ghai S,Paul D,Jain RK	2006
General	Barfoot GB,Peter	2007
General	Constable A,Jonas D,Cockburn A,Davi A,Edwards G,He	2007
General	Februhartanty J,Widyastuti TN,Iswarawanti DN	2007
General	Fuchs M,Gonsalves D	2007
General	Kendra DF,Dyer RB	2007
General	Nasiruddin KM,Nasim A	2007
General	Oeschger MP,Silva CE	2007
General	Peterson M	2007
General	Ramessar K,Peremarti A,Gómez-Galera S,Naqvi S,Mora	2007
General	Raybould A	2007
General	Raybould A	2007
General	Tyshko NV,Aksyuk IN,Tutelyan VA	2007
General	Varzakas TH,Chryssochoidis G,Argyropoulos D	2007
General	Yang X,Tian XC,Kubota C,Page R,Xu J,Cibelli J,Seidel C	2007
General	Cerf O	2008
General	Chao E,Krewski D	2008
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General	Hug K	2008
General	Huggett B	2008
General	Key S,Ma JKC,Drake PMW	2008
General	Kok EJ,Keijer J,Kleter GA,Kuiper HA	2008
General	Krueger R,Buanec BL	2008
General	Kwiatek K,Mazur M,Sieradzki Z	2008
General	Lehrman A,Johnson K	2008
General	Liu Y	2008
General	McHughen A,Smyth S	2008
General	Morin XK	2008
General	Morris SH,Spillane C	2008
General	Nickson TE	2008
General	Ramessar K,Capell T,Twyman RM,Quemada H,Christou	2008
General	Sanvido O,Romeis J,Bigler F	2008
General	Schmidt K,Wilhelm R,Schmidtke J,Beißner L,Mönkemey	2008
General	Sesikeran B,Vasanthi S	2008
General	Smyth S,McHughen A	2008
General	Auer C,Frederick R	2009
General	Borchers A,Teuber SS,Keen CL,Gershwin ME	2009
General	Breyer D,Herman P,Brandenburger A,Gheysen G,Rema	2009
General	Kingiri A,Ayele S	2009
General	Knight AJ	2009
General	Kuiper HA,Kleter GA	2009
General	Lema MA,Burachik M	2009
General	Lemaux PG	2009
General	Mauro IJ,McLachlan SM,Acker RC	2009
General	Peris M,Escuder-Gilabert L	2009
General	Perry JN,ter Braak CJF,Dixon PM,Duan JJ,Hails RS,Hue	2009
General	Rosendal GK,Myhr AI	2009
General	Sparrow PAC	2009
General	Sparrow PAC,Twyman RM	2009
General	Strauss SH,Tan H,Boerjan W,Sedjo R	2009
General	Wilkinson M,Tepfer M	2009
General	Wolt JD	2009
General	Yang J,Wang Z-R,Yang D-L,Yang Q,Yan J,He M-F	2009
General	Araya-Quesada M,Degrassi G,Ripandelli D,Craig W	2010
General	Arber W	2010
General	Beckie HJ,Hall LM,Simard M-J,Leeson JY,Willenborg C.	2010
General	Burachik M	2010
General	Chassy BM	2010

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General	Desneux N,Bernal JS	2010
General	Drew L K	2010
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General	EU	2010
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General	Gressel J	2010
General	Herman RA,Scherer PN,Phillips AM,Storer NP,Krieger M	2010
General	Jacxsens L,Uyttendaele M,Devlieghere F,Rovira J,Gome	2010
General	McHughen A,Wager R	2010
General	Miller HI	2010
General	Munsch MA,Stamp P,Christov NK,Foueillassar XM,Hüsk	2010
General	O'Callaghan M,Soboleva TK,Barratt BIP	2010
General	Parrott W,Chassy B,Ligon J,Meyer L,Petrick J,Zhou J,He	2010
General	Potrykus I	2010
General	Raybould A,Tuttle A,Shore S,Stone T	2010
General	Reuter H,Middelhoff U,Graef F,Verhoeven R,Batz T,Wei	2010
General	Rod A H	2010
General	Smith MD,Asche F,Guttormsen AG,Wiener JB	2010
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Biodiversity	Devillers J,Pham-Delègue MH	2002
Biodiversity	Duan JJ,Head G,McKee MJ,Nickson TE,Martin JW,Saye	2002
Biodiversity	Dutton A,Klein H,Romeis J,Bigler F	2002
Biodiversity	Federici BA	2002
Biodiversity	Felke M,Lorenz N,Langenbruch GA	2002
Biodiversity	Gatehouse AMR,Ferry N,Raemaekers RJM	2002
Biodiversity	Graham J,Gordon SC,Smith K,McNicol RJ,McNicol JW	2002
Biodiversity	Groot AT,Dicke M	2002
Biodiversity	Head G,Surber JB,Watson JA,Martin JW,Duan JJ	2002
Biodiversity	Heuer H,Kroppenstedt RM,Lottmann J,Berg G,Smalla K	2002
Biodiversity	Heuer H,Kroppenstedt RM,Lottmann J,Berg G,Smalla K	2002
Biodiversity	Jesse LCH,Obrycki JJ	2002
Biodiversity	Koskella J,Stotzky G	2002
Biodiversity	Koskella J,Stotzky G	2002
Biodiversity	Kowalchuk GA,Buma DS,de Boer W,Klinkhamer PG,var	2002
Biodiversity	Liu ZC,Ye GY,Hu C	2002
Biodiversity	Lundgren JG,Wiedenmann RN	2002
Biodiversity	Malone L,Tregidga EL,Todd JH,Burgess EPJ,Philip BA	2002
Biodiversity	Malone LA,Pham-Delègue MH	2002
Biodiversity	Manachini B,Lozzia GC	2002
Biodiversity	Misko AL,Germida JJ	2002
Biodiversity	Ponsard S,Gutierrez AP,Mills NJ	2002
Biodiversity	Saxena D,Flores S,Stotzky G	2002
Biodiversity	Saxena D,Stotzky G	2002
Biodiversity	Schmalenberger A,Tebbe CC	2002
Biodiversity	Setamou M,Bernal JS,Legaspi JC,Mirkov TE	2002
Biodiversity	Setamou M,Bernal JS,Legaspi JC,Mirkov TE	2002
Biodiversity	Stotzky G	2002
Biodiversity	Stotzky G	2002
Biodiversity	Sun CG,Xu J,Zhang QW,Feng HB,Wang F,Song R	2002
Biodiversity	Termorshuizen AJ,Lotz LAP	2002
Biodiversity	Tortiglione C,Fanti P,Pennacchio F,Malva C,Breuer M	2002
Biodiversity	Wandeler H,Bahylova J,Nentwig W	2002
Biodiversity	Wu K,Li W,Feng H,Guo Y	2002
Biodiversity	Al-Deeb MA,Wilde GE	2003
Biodiversity	Al-Deeb MA,Wilde GE,Blair JM,Todd TC	2003
Biodiversity	Baur ME,Boethel DJ	2003
Biodiversity	Bell HA,Down RE,Fitches EC,Edwards JP,Gatehouse AI	2003
Biodiversity	Bouchard E,Cloutier C,Michaud D	2003
Biodiversity	Bouchard E,Michaud D,Cloutier C	2003
Biodiversity	Brødsgaard HF,Brødsgaard CJ,Hansen H,Lövei GL	2003
Biodiversity	Brooks DR,Bohan DA,Champion GT,Haughton AJ,Hawe	2003
Biodiversity	Brownbridge M	2003
Biodiversity	Bruinsma M	2003
Biodiversity	Bruinsma M,Kowalchuk GA,van Veen JA	2003
Biodiversity	Candas M,Loseva O,Oppert B,Kosaraju P,Bulla LA	2003
Biodiversity	Carrière Y,Ellers-Kirk C,Sisterson M,Antilla L,Whitlow M,	2003
Biodiversity	Champion GT,May MJ,Bennett S,Brooks DR,Clark SJ,D	2003
Biodiversity	Chassy B,Carter C,McGloughlin M,McHughen A,Parrott	2003
Biodiversity	Conner AJ,Glare TR,Nap J-P	2003
Biodiversity	Cowgill SE,Atkinson HJ	2003
Biodiversity	Dewar AM,May MJ,Woiwod IP,Haylock LA,Champion G	2003
Biodiversity	Dinel H,Schnitzer M,Saharinen M,Meloche F,Paré T	2003
Biodiversity	Dinel H,Schnitzer M,Saharinen M,Meloche F,Paré T,Dur	2003
Biodiversity	Down REF,Ford L,Woodhouse SD,Davison GM,Majerus	2003

Biodiversity	Dunfield KE,Germida JJ	2003
Biodiversity	Dutton A,Romeis J,Bigler F	2003
Biodiversity	Federici BA,Metz M	2003
Biodiversity	Ferreira LHPL,Molina JC,Brasil C,Andrade G	2003
Biodiversity	Ferry NR,Raemaekers JM,Majerus MEN,Jouanin L,Port	2003
Biodiversity	Firbank LG,Heard MS,Woiwod IP,Hawes C,Haughton A.	2003
Biodiversity	Gepts P,Papa R	2003
Biodiversity	Glaser JA,Matten SR	2003
Biodiversity	Hanley A,Huang Z,Pett W	2003
Biodiversity	Haughton AJ,Champion GT,Hawes C,Heard MS,Brooks	2003
Biodiversity	Hawes C,Haughton AJ,Osborne JL,Roy DB,Clark SJ,Pe	2003
Biodiversity	Heard MS,Hawes C,Champion GT,Clark SJ,Firbank LG,	2003
Biodiversity	Heard MS,Hawes C,Champion GT,Clark SJ,Firbank LG,	2003
Biodiversity	Hopkins DW,Gregorich EG	2003
Biodiversity	Howald R,Zwahlen C,Nentwig W	2003
Biodiversity	James C	2003
Biodiversity	Jasinski JR,Eisley JB,Young CE,Kovach J,Willson H	2003
Biodiversity	Jesse LCH,Obrycki JJ	2003
Biodiversity	Jurat-Fuentes JL,Gould FL,Adang MJ	2003
Biodiversity	Kowalchuk GA,Bruinsma M,van Veen JA	2003
Biodiversity	Lee L,Saxena D,Stotzky G	2003
Biodiversity	Mason P,Braun L,Warwick SI,Zhu B,Stewart CN, Jr.	2003
Biodiversity	McPherson RM,Johnson WC,Mullinix BG, Jr.,Mills WA,	2003
Biodiversity	Mohan M,Gujar GT	2003
Biodiversity	Morandin LA,Winston ML	2003
Biodiversity	Musser FR,Shelton AM	2003
Biodiversity	Pons X,Starý P	2003
Biodiversity	Romeis J,Babendreier D,Wackers FL	2003
Biodiversity	Roy DB,Bohan DA,Haughton AJ,Hill MO,Osborne JL,Cla	2003
Biodiversity	Sayyed AH,Schuler TH,Wright DJ	2003
Biodiversity	Schmitz G,Bartsch D,Pretscher P	2003
Biodiversity	Schuler TH,Potting RPJ,Denholm I,Clark SJ,Clark AJ,St	2003
Biodiversity	Sneller CH	2003
Biodiversity	Squire GR,Brooks DR,Bohan DA,Champion GT,Daniels	2003
Biodiversity	Squire GR,Brooks DR,Bohan DA,Champion GT,Daniels	2003
Biodiversity	Stotzky G,Saxena D	2003
Biodiversity	Tomov BW,Bernal JS,Vinson SB	2003
Biodiversity	Volkmar C,Hussein MLA,Jany D,Hunold I,Richter L	2003
Biodiversity	Wu K,Guo Y	2003
Biodiversity	Zwahlen C,Hilbeck A,Gugerli P,Nentwig W	2003
Biodiversity	Zwahlen C,Hilbeck A,Howald R,Nentwig W	2003
Biodiversity	Anderson PL,Hellmich RL,Sears MK,Sumerford DV,Lew	2004
Biodiversity	Benedict JH,Ring DR	2004
Biodiversity	Blackwood CB,Buyer JS	2004
Biodiversity	Brusetti L,Fracia P,Bertolini C,Pagliuca ASB	2004
Biodiversity	Candolfi MP,Brown K,Grimm C,Reber B,Schmidli H	2004
Biodiversity	Carter ME,Villani MG,Allee LL,Losey JE	2004
Biodiversity	De Maagd RA	2004
Biodiversity	Devare MH,Jones CM,Thies JE	2004
Biodiversity	Dively GP,Rose R,Sears MK,Hellmich RL,Stanley-Horn I	2004
Biodiversity	Duan JJ,Head G,Jensen A,Reed G	2004
Biodiversity	Dunfield KE,Germida JJ	2004
Biodiversity	Freckleton RP,Stephens PA,Sutherland WJ,Watkinson A	2004
Biodiversity	Holland JM	2004
Biodiversity	Huang ZY,Hanley AV,Pett WL,Langenberger M,Duan JJ	2004
Biodiversity	Ito A,Sasaguri Y,Kitada S,Kusaka Y,Kuwano K,Masutom	2004
Biodiversity	Jung HG,Sheaffer CC	2004
Biodiversity	Kain WC,Zhao J-Z,Janmaat AF,Myers J,Shelton AM,Wa	2004
Biodiversity	Li H,González-Cabrera J,Oppert B,Ferré J,Higgins RA,B	2004

Biodiversity	Lumbierres B,Albajes R,Pons X	2004
Biodiversity	Lundgren JG,Wiedenmann RN	2004
Biodiversity	Malone LA,Todd JH,Burgess EPJ,Christeller JT	2004
Biodiversity	Manachini B,Landi S,Fiore MC,Festa M,Arpaia S	2004
Biodiversity	Mason P,Braun L,Warwick SI,Zhu B,C. Neal Stewart J	2004
Biodiversity	Men X,Ge F,Edwards C,Yardim E	2004
Biodiversity	Motavalli PP,Kremer RJ,Fang M,Means NE	2004
Biodiversity	O'Callaghan M,Gerard EM,Waipara NW,Young SD,Glar	2004
Biodiversity	O'Callaghan M,Glare TR,Burgess EPJ,Malone LA	2004
Biodiversity	Romeis J,Dutton A,Bigler F	2004
Biodiversity	Saxena D,Stewart CN,Altosaar I,Shu Q,Stotzky G	2004
Biodiversity	Sayyed AH,Raymond B,Ibiza-Palacios MS,Escriche B,W	2004
Biodiversity	Schuler TH,Denholm I,Clark SJ,Stewart CN,Poppy GM	2004
Biodiversity	Sisterson MS,Biggs RW,Olson C,Carrière Y,Dennehy T.	2004
Biodiversity	Stotzky G	2004
Biodiversity	Tabashnik BE,Carrière Y	2004
Biodiversity	Tóth F,Arpás K,Szekeres D,Kádár F,Szentkirályi F,Szén	2004
Biodiversity	Turrini A,Sbrana C,Nuti MP,Pietrangeli B,Giovannetti M	2004
Biodiversity	Wei-Xiang W,Qing-Fu Y,Hang M,Xue-Jun D,Wen-Ming .	2004
Biodiversity	Wu WX,Ye QF,Min H	2004
Biodiversity	Zablotowicz RM,Reddy KN	2004
Biodiversity	Ahmad A,Wilde GE,Kun YZ	2005
Biodiversity	Ahmad A,Wilde GE,Zhu KY	2005
Biodiversity	Ammann K	2005
Biodiversity	Árpás K,Tóth F,Kiss J	2005
Biodiversity	Babendreier D,Kalberer NM,Romeis J,Fluri P,Mulligan E	2005
Biodiversity	Bai YY,Jiang MX,Cheng JA	2005
Biodiversity	Baumgarte S,Tebbe CC	2005
Biodiversity	Baumgarte S,Tebbe CC	2005
Biodiversity	Bhatti MA,Duan J,Head G,Jiang C,McKee MJ,Nickson T	2005
Biodiversity	Bhatti MA,Duan J,Head GP,Jiang C,McKee MJ,Nickson	2005
Biodiversity	Bitzer RJ,Rice ME,Pilcher CD,Pilcher CL,Lam W-kf	2005
Biodiversity	Bohan DA,Boffey CWH,Brooks DR,Clark SJ,Dewar AM,I	2005
Biodiversity	Brimner TA,Gallivan GJ,Stephenson GR	2005
Biodiversity	Brusetti L,Francia P,Bertolini C,Pagliuca A,Borin S,Sorlir	2005
Biodiversity	Castaldini M,Turrini A,Sbrana C,Benedetti A,Marchionni	2005
Biodiversity	Clark BW,Phillips TA,Coats JR	2005
Biodiversity	Daly T,Buntin GD	2005
Biodiversity	de la Poza M,Pons X,Farinós GP,López C,Ortego F,Eiza	2005
Biodiversity	Dively GP	2005
Biodiversity	Douville M,Gagné F,Masson L,McKay J,Blaise C	2005
Biodiversity	Dubelman S,Ayden BR,Bader BM,Brown CR,Jiang C,Vla	2005
Biodiversity	Dutton A,Romeis J,Bigler F	2005
Biodiversity	Fang M,Kremer RJ,Motavalli PP,Davis G	2005
Biodiversity	Flores S,Saxena D,Stotzky G	2005
Biodiversity	Griffiths BS,Caul S,Thompson J,Birch ANE,Scrimgeour (	2005
Biodiversity	Griffiths BS,Caul S,Thompson J,Birch ANE,Scrimgeour (	2005
Biodiversity	Hagerty AM,Kilpatrick AL,Turnipseed SG,Sullivan MJ,Bri	2005
Biodiversity	Head G,Moar W,Eubanks M,Freeman B,Ruberson J,Haq	2005
Biodiversity	Heard MS,Rothery P,Perry JN,Firbank LG	2005
Biodiversity	Hsieh Y-T,Pan T-M	2005
Biodiversity	Kalushkov P,Nedvěd O	2005
Biodiversity	Ammann K	2005
Biodiversity	Li H,Oppert B,Higgins RA,Huang F,Buschman LL,Zhu K	2005
Biodiversity	Li W,Wu K,Wang X,Wang G,Guo Y	2005
Biodiversity	Liu B,Xu C,Yan F,Gong R	2005
Biodiversity	Liu B,Zeng Q,Yan F,Xu H,Xu C	2005
Biodiversity	Liu X,Zhang Q,Zhao J-Z,Cai Q,Xu H,Li J	2005
Biodiversity	Liu XD,Zhai BP,Zhang XX,Zong JM	2005

Biodiversity	Liu X-X,Sun C-G,Zhang Q-W	2005
Biodiversity	Liu X-x,Zhang Q-w,Zhao J-Z,Li J-c,Xu B-l,Ma X-m	2005
Biodiversity	Lopez MD,Prasifka JR,Bruck DJ,Lewis LC	2005
Biodiversity	Lövei Gl,Arpaia S	2005
Biodiversity	Lundgren JG,Wiedenmann RN	2005
Biodiversity	Mattila HR,Sears MK,Duan JJ	2005
Biodiversity	Mehlo L,Gahakwa D,Nghia PT,Loc NT,Capell T,Gatehou	2005
Biodiversity	Meissle M,Lang A	2005
Biodiversity	Meissle M,Vojtech E,Poppy GM	2005
Biodiversity	Men X,Ge F,Edwards CA,Yardim EN	2005
Biodiversity	Muchaonyerwa P,Waladde S,Nyamugafata P,Mpepereki	2005
Biodiversity	Mungai NW,Motavalli PP,Nelson KA,Kremer RJ	2005
Biodiversity	Naranjo SE	2005
Biodiversity	Naranjo SE	2005
Biodiversity	Obrist Lb,Klein H,Dutton A,Bigler F	2005
Biodiversity	O'Callaghan M,Glare TR,Burgess EP,Malone LA	2005
Biodiversity	O'Callaghan M,Glare TR,Burgess EPJ,Malone LA	2005
Biodiversity	Owen MDK,Zelaya IA	2005
Biodiversity	Pilcher CD,Rice ME,Obrycki JJ	2005
Biodiversity	Poerschmann J,Gathmann A,Augustin J,Langer U,Górec	2005
Biodiversity	Pons X,Lumbierres B,Lopez C,Albajes R	2005
Biodiversity	Pont B,Nentwig W	2005
Biodiversity	Qaim M,Traxler G	2005
Biodiversity	Rui YK,Yi GX,Zhao J,Wang BM,Li ZH,Zhai ZX,He ZP,Li	2005
Biodiversity	Schuler TH,Clark AJ,Clark SJ,Poppy GM,Stewart CN, Jr	2005
Biodiversity	Shirai Y,Takahashi M	2005
Biodiversity	Stotzky G	2005
Biodiversity	Stotzky G	2005
Biodiversity	Strandberg B,Bruus Pedersen M,Elmegaard N	2005
Biodiversity	Tabashnik BE,Dennehy TJ,Carrière Y	2005
Biodiversity	Torres JB,Ruberson JR	2005
Biodiversity	Tounou AK,Gounou S,Borgemeister C,Goumedzoe YMI	2005
Biodiversity	Turlings TCJ,Jeanbourquin PM,Held M,Degen T	2005
Biodiversity	Turrini A,Sbrana C,Nuti MP,Pietrangeli BM,Giovannetti M	2005
Biodiversity	Vojtech E,Meissle M,Poppy GM	2005
Biodiversity	Whitehouse MEA,Wilson LJ,Fitt GP	2005
Biodiversity	Wirth MC,Park H-W,Walton WE,Federici BA	2005
Biodiversity	Xie R,Zhuang M,Ross LS,Gomez I,Oltean DI,Bravo A,Sc	2005
Biodiversity	Xue K,Luo HF,Qi HY,Zhang HX	2005
Biodiversity	Zemková Rovenská G,Zemek R,Schmidt JEU,Hilbeck A	2005
Biodiversity	Zhao J-Z,Cao J,Collins HL,Bates SL,Roush RT,Earle ED	2005
Biodiversity	Accinelli C,Koskinen WC,Michael JS	2006
Biodiversity	Adamczyk JJ,Hubbard D	2006
Biodiversity	Ahmad A,Wilde GE,Whitworth RJ,Zolnerowich G	2006
Biodiversity	Ahmad A,Wilde GE,Zhu KY	2006
Biodiversity	Bai YY,Jiang MX,Cheng JA,Wang D	2006
Biodiversity	Bakonyi G,Szira F,Kiss I,Villányi I,Seres A,Székacs A	2006
Biodiversity	Broderick NA,Raffa KF,Handelsman J	2006
Biodiversity	Cattaneo MG,Yafuso C,Schmidt C,Huang C-y,Rahman M	2006
Biodiversity	Chen M,Ye GY,Liu ZC,Yao HW,Chen XX,Shen ZC,Hu C	2006
Biodiversity	Christou P,Capell T,Kohli A,Gatehouse JA,Gatehouse A	2006
Biodiversity	Chu C-C,Natwick ET,López RL,Dessert JR,Henneberry	2006
Biodiversity	Clark BW,Coats JR	2006
Biodiversity	Clark BW,Prihoda KR,Coats JR	2006
Biodiversity	Cortet J,Andersen MN,Caul S,Griffiths B,Joffre R,Lacroi	2006
Biodiversity	Dalecky A,Ponsard S,Bailey RI,Pélissier C,Bourguet D	2006
Biodiversity	Duan JJ,Paradise MS,Lundgren JG,Bookout JT,Jiang C,	2006
Biodiversity	Eizaguirre M,Albajes R,López C,Eras J,Lumbierres B,Po	2006
Biodiversity	Ferry N,Edwards M,Gatehouse J,Capell T,Christou P,Ga	2006

Biodiversity	Ferry N,Mulligan EA,Stewart CN,Tabashnik BE,Port GR,	2006
Biodiversity	Firbank LG,Rothery P,May MJ,Clark SJ,Scott RJ,Stuart I	2006
Biodiversity	Geng J-H,Shen Z-R,Song K,Zheng L	2006
Biodiversity	Gibbons DW,Bohan DA,Rothery P,Stuart RC,Haughton	2006
Biodiversity	Griffiths BS,Caul S,Thompson J,Birch ANE,Scrimgeour (	2006
Biodiversity	Gutierrez AP,Adamczyk Jr JJ,Ponsard S,Ellis CK	2006
Biodiversity	Harris MO,Markwick N,Sandanayake M	2006
Biodiversity	Harwood JD,Obrycki JJ	2006
Biodiversity	Heckmann LH,Griffiths BS,Caul S,Thompson J,Pusztai-(	2006
Biodiversity	Heckmann L-H,Griffiths BS,Caul S,Thompson J,Pusztai-	2006
Biodiversity	Hongwei Y,Gongyin Y,Caiying J,Longjiang F,Karabi D,C(	2006
Biodiversity	Huang F,Leonard BR,Gable RH	2006
Biodiversity	Jurat-Fuentes JL,Adang MJ	2006
Biodiversity	Kelly CK,Bowler M,Breden F	2006
Biodiversity	Lang A,Vojtech E	2006
Biodiversity	Lilley AK,Bailey MJ,Cartwright C,Turner SL,Hirsch PR	2006
Biodiversity	Ludy C,Lang A	2006
Biodiversity	Ludy C,Lang A	2006
Biodiversity	Ma X-M,Liu X-X,Zhang Q-W,Li J-J,Ren A-M	2006
Biodiversity	Melnitchouck A,Leinweber P,Broer I,Eckhardt K-U	2006
Biodiversity	Naef A,Zesiger T,Défago G	2006
Biodiversity	Obrist LB,Dutton A,Albajes R,Bigler F	2006
Biodiversity	Obrist LB,Dutton A,Romeis J,Bigler F	2006
Biodiversity	Obrist LB,Klein H,Dutton A,Bigler F	2006
Biodiversity	Rasche F,Hödl V,Poll C,Kandeler E,Gerzabek MH,van E	2006
Biodiversity	Riudavets J,Gabarra R,Pons MJ,Messeguer J	2006
Biodiversity	Rodrigo-Simon A,de Maagd RA,Avilla C,Bakker PL,Moltl	2006
Biodiversity	Rodrigo-Simón A,de Maagd RA,Avilla C,Bakker PL,Moltl	2006
Biodiversity	Romeis J,Meissle M,Bigler F	2006
Biodiversity	Saeglitz C,Bartsch D,Eber S,Gathmann A,Priesnitz KU,S	2006
Biodiversity	Schmidt MR,Wei W	2006
Biodiversity	Shen RF,Cai H,Gong WH	2006
Biodiversity	Shirai Y	2006
Biodiversity	Siqueira HAA,González-Cabrera J,Ferré J,Flannagan R,	2006
Biodiversity	Torres JB,Ruberson JR	2006
Biodiversity	Torres JB,Ruberson JR	2006
Biodiversity	Vercesi ML,Krogh PH,Holmstrup M	2006
Biodiversity	Wang H,Ye Q,Wang W,Wu L,Wu W	2006
Biodiversity	Weber M,Nentwig W	2006
Biodiversity	Zhang G-F,Wan F-H,Liu W-X,Guo J-Y	2006
Biodiversity	Zhang G-f,Wan F-h,Lövei GL,Liu W-x,Guo J-y	2006
Biodiversity	Zhang SY,Li DM,Cui J,Xie BY	2006
Biodiversity	Zhu S,Su JW,Liu XG,Du L,Yardim EN,Ge F	2006
Biodiversity	Andreadis SS,Alvarez-Alfageme F,Sánchez-Ramos I,St(	2007
Biodiversity	Arpaia S,Di Leo GM,Fiore MC,Schmidt JEU,Scardi M	2007
Biodiversity	Benton TG	2007
Biodiversity	Butler SJ,Vickery JA,Norris K	2007
Biodiversity	Chamberlain DE,Freeman SN,Vickery JA	2007
Biodiversity	Chen M,Liu Z-c,Ye G-y,Shen Z-c,Hu C,Peng Y-f,Altosaa	2007
Biodiversity	Chen M,Zhao J-z,Shelton AM,Cao J,Earle ED	2007
Biodiversity	Cortet J,Griffiths BS,Bohanec M,Demsar D,Andersen MI	2007
Biodiversity	Debeljak M,Cortet J,Demšar D,Krogh PH,Džeroski S	2007
Biodiversity	Devare M,Londoño-R LM,Thies JE	2007
Biodiversity	Díaz-Mendoza M,Farinós GP,Castañera P,Hernández-C	2007
Biodiversity	Douville M,Gagné F,Blaise C,André C	2007
Biodiversity	Fang M,Motavalli PP,Kremer RJ,Nelson KA	2007
Biodiversity	Faria CA,Wäckers FL,Pritchard J,Barrett DA,Turlings TC	2007
Biodiversity	Fernandes OA,Faria M,Martinelli S,Schmidt F,Carvalho '	2007
Biodiversity	Ferry N,Mulligan EA,Majerus MEN,Gatehouse AMR	2007

Biodiversity	Floate KD,Cárcamo HA,Blackshaw RE,Postman B,Bour	2007
Biodiversity	González-Zamora JE,Camúñez S,Avilla C	2007
Biodiversity	Griffiths BS,Heckmann LH,Caul S,Thompson J,Scrimge	2007
Biodiversity	Hoheisel GA,Fleischer SJ	2007
Biodiversity	Huang F,Leonard BR,Andow DA	2007
Biodiversity	Huang Fn,Leonard Br,Andow Da	2007
Biodiversity	Kramarz PE,De Vaufleury A,Carey M	2007
Biodiversity	Krogh PH,Griffiths B,Demšar D,Bohanec M,Debeljak M,	2007
Biodiversity	Li F-f,Ye G-y,Wu Q,Peng Y-f,Chen X-x	2007
Biodiversity	Luo S,Wu K,Tian Y,Liang G,Feng X,Zhang J,Guo Y	2007
Biodiversity	Marvier M,McCreedy C,Regetz J,Kareiva P	2007
Biodiversity	Mulder C,Wouterse M,Rutgers M,Posthuma L	2007
Biodiversity	Nibouche S,Guerard N,Martin P,Vaissayre M	2007
Biodiversity	Pigott CR,Ellar DJ	2007
Biodiversity	Ramirez-Romero R,Bernal JS,Chaufaux J,Kaiser L	2007
Biodiversity	Rose R,Dively GP	2007
Biodiversity	Rose R,Dively GP,Pettis J	2007
Biodiversity	Rosi-Marshall EJ,Tank JL,Royer TV,Whiles MR,Evans-V	2007
Biodiversity	Sabharwal N,Icoz I,Saxena D,Stotzky G	2007
Biodiversity	Sharma HC,Arora R,Pampapathy G	2007
Biodiversity	Sisterson MS,Biggs RW,Manhardt NM,Carrière Y,Denne	2007
Biodiversity	Sivasupramaniam S,Head GP,English L,Li YJ,Vaughn T	2007
Biodiversity	Soberon M,Pardo-Lopez L,Lopez I,Gomez I,Tabashnik E	2007
Biodiversity	Sun CX,Chen LJ,Wu ZJ,Zhou LK,Shimizu H	2007
Biodiversity	Torres Jb,Ruberson Jr	2007
Biodiversity	Toschki A,Hothorn LA,Ross-Nickoll M	2007
Biodiversity	Wang H,Ye Q,Gan J,Wu L	2007
Biodiversity	Wang P,Zhao J-Z,Rodrigo-Simón A,Kain W,Janmaat AF	2007
Biodiversity	Whitehouse MEA,Wilson LJ,Constable GA	2007
Biodiversity	Zwahlen C,Hilbeck A,Nentwig W	2007
Biodiversity	Alvarez-Alfageme F,Ferry N,Castañera P,Ortego F,Gate	2008
Biodiversity	Andreote FD,Mendes R,Dini-Andreote F,Rossetto PB,La	2008
Biodiversity	Babendreier D,Reichhart B,Romeis J,Bigler F	2008
Biodiversity	Beachy RN,Fedoroff NV,Goldberg RB,McHughen A	2008
Biodiversity	Bravo A,Soberón M	2008
Biodiversity	Chen M,Zhao J-Z,Collins HL,Earle ED,Cao J,Shelton AM	2008
Biodiversity	Devos Y,Cougnon M,Vergucht S,Bulcke R,Haesaert G,S	2008
Biodiversity	Duan JJ,Marvier M,Huesing J,Dively G,Huang ZY	2008
Biodiversity	Duan JJ,Teixeira D,Huesing JE,Jiang C	2008
Biodiversity	Ernst D,Rosenbrock-Krestel H,Kirchhof G,Bieber E,Giun	2008
Biodiversity	Farinós GP,de la Poza M,Hernández-Crespo P,Ortego F	2008
Biodiversity	Filion M	2008
Biodiversity	Guo J-Y,Wan F-H,Dong L,Lövei GL,Han Z-J	2008
Biodiversity	Hönemann L,Zurbrügg C,Nentwig W	2008
Biodiversity	Icoz I,Saxena D,Andow DA,Zwahlen C,Stotzky G	2008
Biodiversity	Icoz I,Stotzky G	2008
Biodiversity	Kim YH,Kang JS,Kim JI,Kwon M,Lee S,Cho HS,Lee SH	2008
Biodiversity	Kleter GA,Harris C,Stephenson G,Unsworth J	2008
Biodiversity	Kumar S,Chandra A,Pandey KC	2008
Biodiversity	Lawo NC,Romeis J	2008
Biodiversity	Lewandowski A,Górecka J	2008
Biodiversity	Li Y,Meissle M,Romeis J	2008
Biodiversity	Meihls LN,Higdon ML,Siegfried BD,Miller NJ,Sappington	2008
Biodiversity	Moser SE,Harwood JD,Obrycki JJ	2008
Biodiversity	Oliveira AP,Pampulha ME,Bennett JP	2008
Biodiversity	Oliver KL,Hamelin RC,Hintz WE	2008
Biodiversity	Owen MDK	2008
Biodiversity	Priestley AL,Brownbridge M	2008
Biodiversity	Prihoda KR,Coats JR	2008

Biodiversity	Prihoda KR,Coats JR	2008
Biodiversity	Ramirez-Romero R,Desneux N,Chaufaux J,Kaiser L	2008
Biodiversity	Rauschen S,Eckert J,Schaarschmidt F,Schuphan I,Gath	2008
Biodiversity	Romeis J,Bartsch D,Bigler F,Candolfi MP,Gielkens MMC	2008
Biodiversity	Sayyed AH,Moores G,Crickmore N,Wright DJ	2008
Biodiversity	Sharma Hc,Dhillon Mk,Arora R	2008
Biodiversity	Shu Y,Ma H,Du Y,Li Z,Feng Y,Wang J	2008
Biodiversity	Squire GR,Hawes C,Begg GS,Young MW	2008
Biodiversity	Storer NP,Dively GP,Herman RA	2008
Biodiversity	Torres JB,Ruberson JR	2008
Biodiversity	Van Overbeek L,Van Elsas JD	2008
Biodiversity	van Wyk A,van den Berg J,van Hamburg H	2008
Biodiversity	Wolfenbarger LL,Naranjo SE,Lundgren JG,Bitzer RJ,Wa	2008
Biodiversity	Wu K-M,Lu Y-H,Feng H-Q,Jiang Y-Y,Zhao J-Z	2008
Biodiversity	Wu WX,Liu W,Lu HH,Chen YX,Devare M,Thies J	2008
Biodiversity	Zhang G-F,Wan F-H,Murphy ST,Guo J-Y,Liu W-X	2008
Biodiversity	Albajes R,Lumbierres B,Pons X	2009
Biodiversity	Álvarez-Alfageme F,Ortego F,Castañera P	2009
Biodiversity	Blanco CA,Andow DA,Abel CA,Sumerford DV,Hernande	2009
Biodiversity	Brévault T,Prudent P,Vaissayre M,Carrière Y	2009
Biodiversity	Carrière Y,Ellers-Kirk C,Cattaneo MG,Yafuso CM,Antilla	2009
Biodiversity	Carrière Y,Showalter AM,Fabrick JA,Sollome J,Ellers-Kir	2009
Biodiversity	Chodová D,Salava J,Martincová O,Cvikrová M	2009
Biodiversity	Crespo ALB,Spencer TA,Alves AP,Hellmich RL,Blanken	2009
Biodiversity	Dhillon MK,Sharma HC	2009
Biodiversity	Downes S,Parker TL,Mahon RJ	2009
Biodiversity	Duke SO,Powles SB	2009
Biodiversity	Fabrick JA,Forlow Jech L,Henneberry TJ	2009
Biodiversity	George TS,Richardson AE,Li SS,Gregory PJ,Daniell TJ	2009
Biodiversity	Givens WA,Shaw DR,Kruger GR,Johnson WG,Weller S	2009
Biodiversity	Gray ME,Sappington TW,Miller NJ,Moeser J,Bohn MO	2009
Biodiversity	Hibbard BE,El Khishen AA,Vaughn TT	2009
Biodiversity	Higgins LS,Babcock J,Neese P,Layton RJ,Moellenbeck	2009
Biodiversity	Hönemann L,Nentwig W	2009
Biodiversity	Kaiser-Alexnat R	2009
Biodiversity	Khishen AAE,Bohn MO,Prischmann-Voldseth DA,Dashie	2009
Biodiversity	Kim YT,Lee KS,Kim MJ,Kim SB	2009
Biodiversity	Kos M,van Loon JJA,Dicke M,Vet LEM	2009
Biodiversity	Kramarz P,de Vaufleury A,Gimbert F,Cortet J,Tabone E,	2009
Biodiversity	Kruger GR,Johnson WG,Weller SC,Owen MDK,Shaw D	2009
Biodiversity	Lawhorn CN,Neher DA,Dively GP	2009
Biodiversity	Lawo NC,Wäckers FL,Romeis J	2009
Biodiversity	Letourneau DK,Hagen JA	2009
Biodiversity	Liu B,Wang L,Zeng Q,Meng J,Hu W,Li X,Zhou K,Xue K,I	2009
Biodiversity	Liu F,Xu Z,Zhu YC,Huang F,Wang Y,Li H,Li H,Gao C,Zh	2009
Biodiversity	López-Pazos SA,Arias R,Carolina A,Ospina SA,Cerón J	2009
Biodiversity	Lövei GL,Andow DA,Arpaia S	2009
Biodiversity	Mahon RJ,Olsen KM	2009
Biodiversity	Muñóz-Garay C,Portugal L,Pardo-López L,Jiménez-Juár	2009
Biodiversity	Naranjo SE	2009
Biodiversity	Park Y,Abdullah MAF,Taylor MD,Rahman K,Adang MJ	2009
Biodiversity	Prasifka JR,Hellmich RL,Sumerford DV,Siegfried BD	2009
Biodiversity	Rajagopal R,Arora N,Sivakumar S,Rao Nagarjun GV,Nir	2009
Biodiversity	Rauschen S,Schultheis E,Pagel-Wieder S,Schuphan I,E	2009
Biodiversity	Sarkar B,Patra AK,Purakayastha TJ,Megharaj M	2009
Biodiversity	Schmidt JEU,Braun CU,Whitehouse LP,Hilbeck A	2009
Biodiversity	Shelton A,Naranjo S,Romeis J,Hellmich R,Wolt J,Federi	2009
Biodiversity	Soberón M,Gill S,Bravo A	2009
Biodiversity	Stefani FOP,Moncalvo J-M,Séguin A,Bérubé JA,Hamelir	2009

Biodiversity	Tabashnik BE,Unnithan GC,Masson L,Crowder DW,Li X	2009
Biodiversity	Tabashnik BE,Van Rensburg JBJ,Carrière Y	2009
Biodiversity	Tindall KV,Willrich Siebert M,Leonard BR,All J,Haile FJ	2009
Biodiversity	Wang Z-j,Lin H,Huang J-k,Hu R-f,Rozelle S,Pray C	2009
Biodiversity	Weinert N,Meincke R,Gottwald C,Heuer H,Gomes NCM.	2009
Biodiversity	Wu G,Harris MK,Guo JY,Wan FH	2009
Biodiversity	Wu X,Huang F,Rogers Leonard B,Ottea J	2009
Biodiversity	Wu X,Rogers Leonard B,Zhu YC,Abel CA,Head GP,Hua	2009
Biodiversity	Xu Z,Liu F,Chen J,Huang F,Andow DA,Wang Y,Zhu YC,	2009
Biodiversity	Yu Q,Abdallah I,Han H,Owen M,Powles S	2009
Biodiversity	An J,Gao Y,Wu K,Gould F,Gao J,Shen Z,Lei C	2010
Biodiversity	Andow DA,Farrell SL,Hu Y	2010
Biodiversity	Balog A,Kiss J,Szekeres D,Szénási Á,Markó V	2010
Biodiversity	Bergé JB,Ricroch AE	2010
Biodiversity	Burkness EC,Dively G,Patton T,Morey AC,Hutchison WI	2010
Biodiversity	Carpenter JE	2010
Biodiversity	Chambers CP,Whiles MR,Rosi-Marshall EJ,Tank JL,Roy	2010
Biodiversity	Desneux N,Ramírez-Romero R,Bokonon-Ganta AH,Beri	2010
Biodiversity	Dorhout DL,Rice ME	2010
Biodiversity	Downes S,Parker T,Mahon R	2010
Biodiversity	Downes S,Parker TL,Mahon RJ	2010
Biodiversity	Duan JJ,Lundgren JG,Naranjo S,Marvier M	2010
Biodiversity	Felke M,Langenbruch G-A,Feiertag S,Kassa A	2010
Biodiversity	Gaines TA,Zhang W,Wang D,Bukun B,Chisholm ST,Sha	2010
Biodiversity	Gao Y-L,Feng H-Q,Wu K-M	2010
Biodiversity	Goldstein JA,Mason CE,Pesek J	2010
Biodiversity	Gong Y,Wang C,Yang Y,Wu S,Wu Y	2010
Biodiversity	Gray ME	2010
Biodiversity	Hibbard BE,Clark TL,Ellersieck MR,Meihls LN,Khishen A	2010
Biodiversity	Hibbard BE,Meihls LN,Ellersieck MR,Onstad DW	2010
Biodiversity	Hutchison WD,Burkness EC,Mitchell PD,Moon RD,Leslie	2010
Biodiversity	Imura O,Shi K,Iimura K,Takamizo T	2010
Biodiversity	Jensen PD,Dively GP,Swan CM,Lamp WO	2010
Biodiversity	Kapur M,Bhatia R,Pandey G,Pandey J,Paul D,Jain R	2010
Biodiversity	Lee S-H,Kim C-G,Kang H	2010
Biodiversity	Li G,Feng H,Chen P,Wu S,Liu B,Qiu F	2010
Biodiversity	Li Y,Meissle M,Romeis J	2010
Biodiversity	Li Y,Romeis J	2010
Biodiversity	Lin C-H,Pan T-M	2010
Biodiversity	Liu N,Zhu P,Peng C,Kang L,Gao H,Clarke NJ,Clarke JL	2010
Biodiversity	Liu W	2010
Biodiversity	Lottmann J,O'Callaghan M,Baird D,Walter C	2010
Biodiversity	Lu Y,Wu K,Jiang Y,Xia B,Li P,Feng H,Wyckhuys KAG,G	2010
Biodiversity	Malone LA,Todd JH,Burgess EPJ,Walter C,Wagner A,B.	2010
Biodiversity	Mann RS,Gill RS,Dhawan AK,Shera PS	2010
Biodiversity	Murphy AF,Ginzel MD,Krupke CH	2010
Biodiversity	National Research C	2010
Biodiversity	Onstad DW,Meinke LJ	2010
Biodiversity	O'Rourke ME,Sappington TW,Fleischer SJ	2010
Biodiversity	Perry JN,Devos Y,Arpaia S,Bartsch D,Gathmann A,Hails	2010
Biodiversity	Powles SB	2010
Biodiversity	Rauschen S,Schaarschmidt F,Gathmann A	2010
Biodiversity	Rauschen S,Schultheis E,Hunfeld H,Schaarschmidt F,Si	2010
Biodiversity	Raven PH	2010
Biodiversity	Raybould A,Vlachos D	2010
Biodiversity	Sayed A,Wiechman B,Struewing I,Smith M,French W,Ni	2010
Biodiversity	Tabashnik BE,Carrière Y	2010
Biodiversity	Tank JL,Rosi-Marshall EJ,Royer TV,Whiles MR,Griffiths	2010
Biodiversity	Tian JC,Liu ZC,Chen M,Chen Y,Chen XX,Peng YF,Hu C	2010

Biodiversity	Wouw M,Hintum T,Kik C,Treuren R,Visser B	2010
Biodiversity	Zeilinger AR,Andow DA,Zwahlen C,Stotzky G	2010
Biodiversity	Zhao J,Jin L,Yang Y,Wu Y	2010
Biodiversity	Alvarez-Alfageme F,Bigler F,Romeis J	2011
Biodiversity	Alyokhin A	2011
Biodiversity	Bai Y,Yan R,Ke X,Ye G,Huang F,Luo Y,Cheng J	2011
Biodiversity	Baxter SW,Badenes-Pérez FR,Morrison A,Vogel H,Crick	2011
Biodiversity	Burgess EPJ,Barraclough EI,Kean AM,Walter C,Malone	2011
Biodiversity	Burgio G,Dinelli G,Marotti I,Zurla M,Bosi S,Lanzoni A	2011
Biodiversity	Burkness EC,O'Rourke PK,Hutchison WD	2011
Biodiversity	Carpenter JE	2011
Biodiversity	Chaplin-Kramer R,O'Rourke ME,Blitzer EJ,Kremen C	2011
Biodiversity	Cheeke TE,Pace BA,Rosenstiel TN,Cruzan MB	2011
Biodiversity	Cui J,Luo J,Werf WVD,Ma Y,Xia J	2011
Biodiversity	D'Angelo-Picard C,Chapelle E,Ratet P,Faure D,Dessaux	2011
Biodiversity	Dhurua S,Gujar GT	2011
Biodiversity	Fabrick JA,Mathew LG,Tabashnik BE,Li X	2011
Biodiversity	Frank DL,Bukowsky R,French BW,Hibbard BE	2011
Biodiversity	Gassmann AJ,Petzold-Maxwell JL,Keweshan RS,Dunba	2011
Biodiversity	Gatehouse AMR,Ferry N,Edwards MG,Bell HA	2011
Biodiversity	Gill TA,Sandoya G,Williams P,Luthe DS	2011
Biodiversity	Guo J,Wu G,Wan F	2011
Biodiversity	Hendriksma HP,Härtel S,Steffan-Dewenter I	2011
Biodiversity	Hibbard BE,Frank DL,Kurtz R,Boudreau E,Ellersieck MR	2011
Biodiversity	Höss S,Nguyen HT,Menzel R,Pagel-Wieder S,Miethling-	2011
Biodiversity	Huang F,Ghimire MN,Leonard BR,Wang J,Daves C,Lev	2011
Biodiversity	Jurat-Fuentes JL,Karumbaiah L,Jakka SRK,Ning C,Liu C	2011
Biodiversity	Kaur P,Dilawari VK	2011
Biodiversity	Kruger M,Rensburg JRJV,Berg JVD	2011
Biodiversity	Lee Y-E,Yang S-H,Bae T-W,Kang H-G,Lim P-O,Lee H-Y	2011
Biodiversity	Letourneau DK,Armbrecht I,Rivera BS,Lerma JM,Carmo	2011
Biodiversity	Li Y,Romeis J,Wang P,Peng Y,Shelton AM	2011
Biodiversity	Liu X,Chen M,Onstad D,Roush R,Shelton AM	2011
Biodiversity	Liu Z,Gao Y,Luo J,Lai F,Li Y,Fu Q,Peng Y	2011
Biodiversity	Madliger M,Gasser CA,Schwarzenbach RP,Sander M	2011
Biodiversity	Manimaran P,Ramkumar G,Mohan M,Mangrauthia SK,P	2011
Biodiversity	Meihls LN,Higdon ML,Ellersieck M,Hibbard BE	2011
Biodiversity	Meissle M,Hellmich RL,Romeis J	2011
Biodiversity	Meissle M,Romeis J,Bigler F	2011
Biodiversity	Miao J,Wu Y,Xu W,Hu L,Yu Z,Xu Q	2011
Biodiversity	Moraes MCB,Laumann RA,Aquino MFS,Paula DP,Borge	2011
Biodiversity	Oliveira GR,Silva MCM,Lucena WA,Nakasu EYT,Firmino	2011
Biodiversity	O'Rourke ME,Rienzo-Stack K,Power AG	2011
Biodiversity	Oswald KJ,French BW,Nielson C,Bagley M	2011
Biodiversity	Ouyang F,Liu Z,Yin J,Su J,Wang C,Ge F	2011
Biodiversity	Pan Z,Onstad DW,Nowatzki TM,Stanley BH,Meinke LJ,F	2011
Biodiversity	Pérez-Hedo M,Albajes R,Eizaguirre M	2011
Biodiversity	Porta H,Jiménez G,Cordoba E,León P,Soberón M,Bravo	2011
Biodiversity	Razze JM,Mason CE,Pizzolato TD	2011
Biodiversity	Sanahuja G,Banakar R,Twyman RM,Capell T,Christou F	2011
Biodiversity	Shu Y,Ma H,Du Y,Li Z,Feng Y,Wang J	2011
Biodiversity	Simmons GS,McKemey AR,Morrison NI,O'Connell S,Tal	2011
Biodiversity	Vigouroux Y,Barnaud A,Scarcelli N,Thuillet A-C	2011
Biodiversity	von Burg S,van Veen FJF,Álvarez-Alfageme F,Romeis J	2011
Biodiversity	Williams JL,Ellers-Kirk C,Orth RG,Gassmann AJ,Head C	2011
Biodiversity	Wolfenbarger LL,Naranjo SE,Lundgren JG,Bitzer RJ,Wa	2011
Biodiversity	Xu X,Han Y,Wu G,Cai W,Yuan B,Wang H,Liu F,Wang M	2011
Biodiversity	Xue K,Serohijos RC,Devare M,Thies JE	2011
Biodiversity	Yu H-L,Li Y-H,Wu K-M	2011

Biodiversity	Yuan Y,Ke X,Chen F,Krogh PH,Ge F	2011
Biodiversity	Zhang B,Chen M,Zhang X,Luan H,Tian Y,Su X	2011
Biodiversity	Zhang H,Yin W,Zhao J,Jin L,Yang Y,Wu S,Tabashnik BE	2011
Biodiversity	Alcantara EP	2012
Biodiversity	Andow DA,Lövei GL	2012
Biodiversity	Bai Y-Y,Yan R-H,Ye G-Y,Huang F,Wangila D,Wang J-J,	2012
Biodiversity	Barriuso J,Valverde JR,Mellado RP	2012
Biodiversity	Blanco CA	2012
Biodiversity	Carrière Y,Ellers-Kirk C,Hartfield K,Larocque G,Degain E	2012
Biodiversity	Chaudhry V,Dang HQ,Tran NQ,Mishra A,Chauhan PS,G	2012
Biodiversity	Chen Y,Tian J-C,Wang W,Fang Q,Akhtar ZR,Peng Y-F,(	2012
Biodiversity	Cotta SR,Dias ACF,Marriel IE,Gomes EA,van Elsas JD,S	2012
Biodiversity	da Cunha FM,Caetano FH,Wanderley-Teixeira V,Torres	2012
Biodiversity	Dai P-L,Zhou W,Zhang J,Cui H-J,Wang Q,Jiang W-Y,Su	2012
Biodiversity	de Castro TR,Ausique JJS,Nunes DH,Ibanhes FH,Delali	2012
Biodiversity	Dematheis F,Zimmerling U,Flocco C,Kurtz B,Vidal S,Kro	2012
Biodiversity	Devos Y,De Schrijver A,De Clercq P,Kiss J,Romeis J	2012
Biodiversity	Dohrmann AB,Küting M,Jünemann S,Jaenicke S,Schlüte	2012
Biodiversity	Dutra CC,Koch RL,Burkness EC,Meissle M,Romeis J,Hu	2012
Biodiversity	Farinós GP,de la Poza M,Ortego F,Castañera P	2012
Biodiversity	Fernandes FS,Ramalho FS,Nascimento JL,Malaquias JI	2012
Biodiversity	García M,Ortego F,Castañera P,Farinós GP	2012
Biodiversity	Gruber H,Paul V,Meyer H,Müller M	2012
Biodiversity	Hansen LS,Lövei GL,Székács A	2012
Biodiversity	Huang F,Ghimire MN,Leonard BR,Daves C,Levy R,Bald	2012
Biodiversity	Li X,Liu B,Wang X,Han Z,Cui J,Luo J	2012
Biodiversity	Lu Y,Wu K,Jiang Y,Guo Y,Desneux N	2012
Biodiversity	Mina U,Chaudhary A	2012
Biodiversity	Pérez-Hedo M,López C,Albajes R,Eizaguirre M	2012
Biodiversity	Perry JN,Devos Y,Arpaia S,Bartsch D,Ehlert C,Gathman	2012
Biodiversity	Romeis J,Raybould A,Bigler F,Candolfi MP,Hellmich RL,	2012
Biodiversity	Salas RA,Dayan FE,Pan Z,Watson SB,Dickson JW,Scot	2012
Biodiversity	Schuppener M,Mühlhause J,Müller A-K,Rauschen S	2012
Biodiversity	Singh R,Ahlawat I,Singh S	2012
Biodiversity	Sosnoskie LM,Webster TM,Kichler JM,MacRae AW,Gre	2012
Biodiversity	Tian J-C,Chen Y,Li Z-L,Li K,Chen M,Peng Y-F,Hu C,She	2012
Biodiversity	Tian J-C,Collins H,Romeis J,Naranjo S,Hellmich R,Shelt	2012
Biodiversity	Verbruggen E,Kuramae EE,Hillekens R,de Hollander M,I	2012
Biodiversity	Wan P,Huang Y,Wu H,Huang M,Cong S,Tabashnik BE,\	2012
Biodiversity	Romeis J,McLean Ma,Shelton AM	2013
Gf - Coexistence	Bock A-K,Lheureux K,Libeau-Dulos M,Nilsagård H,Rodri	2002
Gf - Coexistence	Perry JN	2002
Gf - Coexistence	Rieger MA,Lamond M,Preston C,Powles SB,Roush RT	2002
Gf - Coexistence	Ritala A,Nuutila AM,Aikasalo R,Kauppinen V,Tammisola	2002
Gf - Coexistence	Klein EK,Lavigne C,Foueillassar X,Gouyon P-H,Larédo (	2003
Gf - Coexistence	Loos C,Seppelt R,Meier-Bethke S,Schiemann J,Richter	2003
Gf - Coexistence	Chilcutt CF,Tabashnik BE	2004
Gf - Coexistence	Devos Y,Reheul D,de Schrijver A,Cors F,Moens W	2004
Gf - Coexistence	Devos Y,Reheul D,De Schrijver A	2005
Gf - Coexistence	Flannery M-L,Meade C,Mullins E	2005
Gf - Coexistence	Gruber S,Pekrun C,Claupein W	2005
Gf - Coexistence	Lutman PJW,Berry K,Payne RW,Simpson E,Sweet JB,C	2005
Gf - Coexistence	Rong J,Song Z,Su J,Xia H,Lu B-R,Wang F	2005
Gf - Coexistence	Al-Ahmad H,Dwyer J,Moloney M,Gressel J	2006
Gf - Coexistence	Cerdeira AL,Duke SO	2006
Gf - Coexistence	Devos Y,Reheul D,Thas O,De Clercq EM,Cordemans K	2006
Gf - Coexistence	European c	2006
Gf - Coexistence	Jank B,Rath J,Gaugitsch H	2006
Gf - Coexistence	Messeguer J,Peñas G,Ballester J,Bas M,Serra J,Salvia	2006

Gf - Coexistence	Moschini G	2006
Gf - Coexistence	Van De Wiel CCM,Lotz LAP	2006
Gf - Coexistence	Abud S,de Souza PIM,Vianna GR,Leonardecz E,Moreira	2007
Gf - Coexistence	Goggi AS,Lopez-Sanchez H,Caragea P,Westgate M,Arr	2007
Gf - Coexistence	Hoyle M,Cresswell JE	2007
Gf - Coexistence	Hoyle M,Hayter K,Cresswell JE	2007
Gf - Coexistence	Hüsken A,Dietz-Pfeilstetter A	2007
Gf - Coexistence	Jia S,Wang F,Shi L,Yuan Q,Liu W,Liao Y,Li S,Jin W,Per	2007
Gf - Coexistence	Kuparinen A,Schurr F,Tackenberg O,O'Hara RB	2007
Gf - Coexistence	Lipsius K,Wilhelm R,Richter O,Schmalstieg KJ,Schiema	2007
Gf - Coexistence	Matus-Cádiz MA,Hucl P,Dupuis B	2007
Gf - Coexistence	Petti C,Meade C,Downes M,Mullins E	2007
Gf - Coexistence	Rong J,Lu B-R,Song Z,Su J,Snow AA,Zhang X,Sun S,Cl	2007
Gf - Coexistence	Sanvido O,Widmer F,Winzeler M,Streit B,Szerencsits E,	2007
Gf - Coexistence	Scott M,Peterson J,Moran D,Sangtong V,Smith L	2007
Gf - Coexistence	Yoshimura Y,Matsuo K,Yasuda K	2007
Gf - Coexistence	Chandler S,Dunwell JM	2008
Gf - Coexistence	Colbach N	2008
Gf - Coexistence	Demont M,Devos Y	2008
Gf - Coexistence	Devos Y,Cougnon M,Thas O,Reheul D	2008
Gf - Coexistence	Devos Y,Demont M,Sanvido O	2008
Gf - Coexistence	D'Hertefeldt T,Jørgensen RB,Pettersson LB	2008
Gf - Coexistence	Heuberger S,Yafuso C,Degrandi-Hoffman G,Tabashnik I	2008
Gf - Coexistence	Langhof M,Hommel B,Hüsken A,Schiemann J,Wehling F	2008
Gf - Coexistence	Mallory-Smith C,Zapiola M	2008
Gf - Coexistence	McPherson MA,Yang R-C,Good AG,Nielson RL,Hall LM	2008
Gf - Coexistence	Palaudelmàs M,Melé E,Peñas G,Pla M,Nadal A,Serra J,	2008
Gf - Coexistence	Yao K,Hu N,Chen W,Li R,Yuan Q,Wang F,Qian Q,Jia S	2008
Gf - Coexistence	Colbach N,Devaux C,Angevin F	2009
Gf - Coexistence	Darmency H,Klein EK,Gestat De Garanbé T,Gouyon P-H	2009
Gf - Coexistence	Dietz-Pfeilstetter A,Zwerger P	2009
Gf - Coexistence	Dyer GA,Serratos-Hernández JA,Perales HR,Gepts P,Pi	2009
Gf - Coexistence	Gryson N,Eeckhout M,Trouillier A,Le Bail M,Soler L-G	2009
Gf - Coexistence	Harst M,Cobanov B-A,Hausmann L,Eibach R,Töpfer R	2009
Gf - Coexistence	Jørgensen R,Hauser T,D'Hertefeldt T,Andersen N,Hooft	2009
Gf - Coexistence	Knispel AL,McLachlan SM	2009
Gf - Coexistence	McPherson MA,Good AG,Topinka AKC,Yang R-C,McKe	2009
Gf - Coexistence	Palaudelmàs M,Peñas G,Melé E,Serra J,Salvia J,Pla M,I	2009
Gf - Coexistence	Rose C,Millwood R,Moon H,Rao M,Halfhill M,Raymer P,	2009
Gf - Coexistence	Sandhu S,James V,Quesenberry K,Altpeter F	2009
Gf - Coexistence	Wang T,Shi Y,Li Y,Darmency H	2009
Gf - Coexistence	Willenborg C,Brûlé-Babel A,Van Acker R	2009
Gf - Coexistence	Dexter JE,Jhala AJ,Yang R-C,Hills MJ,Weselake RJ,Hal	2010
Gf - Coexistence	Faria JC,Carneiro GES,Aragão FJL	2010
Gf - Coexistence	Heuberger S,Ellers-Kirk C,Tabashnik BE,Carrière Y	2010
Gf - Coexistence	Knispel A,McLachlan S	2010
Gf - Coexistence	Langhof M,Hommel B,Hüsken A,Njontie C,Schiemann J.	2010
Gf - Coexistence	Ramessar K,Capell T,Twyman RM,Christou P	2010
Gf - Coexistence	Riesgo L,Areal FJ,Sanvido O,Rodríguez-Cerezo E	2010
Gf - Coexistence	Šuštar-Vozlič J,Rostohar K,Blejec A,Kozjak P,Čergan Z,	2010
Gf - Coexistence	Ushiyama T,Du M,Inoue S,Shibaike H,Yonemura S,Kaw	2010
Gf - Coexistence	Vogler A,Bertossa M,Aulinger-Leipner I,Stamp P	2010
Gf - Coexistence	Wilkinson MJ	2010
Gf - Coexistence	Beckie HJ,Warwick SI,Sauder CA,Hall LM,Harker KN,Lo	2011
Gf - Coexistence	Chiarabolli A	2011
Gf - Coexistence	Chun Y,Kim D,Park K,Kim H-J,Jeong S-C,An J,Cho K,Ba	2011
Gf - Coexistence	Dietiker D,Oehen B,Ochsenbein C,Westgate ME,Stamp	2011
Gf - Coexistence	Galeano P,Debat CM,Ruibal F,Fraguas LF,Galván GA	2011
Gf - Coexistence	H. Cici SZ,Van Acker RC	2011

Gf - Coexistence	Jhala AJ,Bhatt H,Topinka K,Hall LM	2011
Gf - Coexistence	Kleppin L,Schmidt G,Schröder W	2011
Gf - Coexistence	Palaudelmàs M,Melé E,Monfort A,Serra J,Salvia J,Mess	2011
Gf - Coexistence	Paul L,Angevin F,Collonnier C,Messéan A	2011
Gf - Coexistence	Pons E,Navarro A,Ollitrault P,Peña L	2011
Gf - Coexistence	Rieben S,Kalinina O,Schmid B,Zeller SL	2011
Gf - Coexistence	Robson P,Kelly R,Jensen E,Giddings G,Leitch M,Davey	2011
Gf - Coexistence	Rühl G,Hommel B,Hüsken A,Mastel K,Schiemann J,Wel	2011
Gf - Coexistence	Schafer MG,Ross AA,Londo JP,Burdick CA,Lee EH,Trav	2011
Gf - Coexistence	Wilkinson MJ	2011
Gf - Coexistence	Yoshimura Y	2011
Gf - Coexistence	Bethwell C,Müller H-J,Eulenstein F,Graef F	2012
Gf - Coexistence	Devos Y,Hails R,Messéan A,Perry J,Squire G	2012
Gf - Coexistence	Foetzki A,Quijano CD,Moullet O,Fammartino A,Kneubue	2012
Gf - Coexistence	Loureiro I,Escorial M-C,González Á,Chueca M-C	2012
Gf - Coexistence	Munier DJ,Brittan KL,Lanini WT	2012
Gf - Coexistence	Palaudelmàs M,Melé E,Monfort A,Serra J,Salvia J,Mess	2012
Gf - Coexistence	Raybould A,Higgins LS,Horak MJ,Layton RJ,Storer NP,I	2012
Gf - Wild relatives	Burke JM,Gardner KA,Rieseberg LH	2002
Gf - Wild relatives	Daniell H	2002
Gf - Wild relatives	Gueritaine G,Sester M,Eber F,Chevre AM,Darmency H	2002
Gf - Wild relatives	Halfhill MD,Millwood RJ,Raymer PL,Stewart CN, Jr.	2002
Gf - Wild relatives	Kaplinsky N,Braun D,Lisch D,Hay A,Hake S,Freeling M	2002
Gf - Wild relatives	Lavigne C,Klein EK,Couvet D	2002
Gf - Wild relatives	Lu M,Kato M,Kakihara F	2002
Gf - Wild relatives	Metz M,Futterer J	2002
Gf - Wild relatives	Moyes CL,Lilley JM,Casais CA,Cole SG,Haeger PD,Dale	2002
Gf - Wild relatives	Snow AA	2002
Gf - Wild relatives	Viard F,Bernard J,Desplanque B	2002
Gf - Wild relatives	Arnaud JF,Viard F,Delescluse M,Cuguen J	2003
Gf - Wild relatives	Bartsch D,Cuguen J,Biancardi E,Sweet J	2003
Gf - Wild relatives	Ellstrand NC	2003
Gf - Wild relatives	Halfhill MD,Millwood RJ,Weissinger AK,Warwick SI,Stev	2003
Gf - Wild relatives	Hauser TP,Damgaard C,Jørgensen RB	2003
Gf - Wild relatives	Haygood R,Ives AR,Andow DA	2003
Gf - Wild relatives	Jenczewski E,Ronfort J,Chèvre A-M	2003
Gf - Wild relatives	Letourneau DK,Robinson GS,Hagen JA	2003
Gf - Wild relatives	Stewart CN, Jr.,Halfhill MD,Warwick SI	2003
Gf - Wild relatives	Warwick SI,Simard MJ,Légère A,Beckie HJ,Braun L,Zhu	2003
Gf - Wild relatives	Celis C,Scurrah M,Cowgill S,Chumbiauca S,Green J,Fra	2004
Gf - Wild relatives	Chen LJ,Lee DS,Song ZP,Suh HS,Lu BR	2004
Gf - Wild relatives	Guy M P	2004
Gf - Wild relatives	Halfhill MD,Zhu B,Warwick SI,Raymer PL,Millwood RJ,W	2004
Gf - Wild relatives	Vacher C,Weis AE,Hermann D,Kossler T,Young C,Hoch	2004
Gf - Wild relatives	Watrud LS,Lee EH,Fairbrother A,Burdick C,Reichman JI	2004
Gf - Wild relatives	Zhu B,Lawrence JR,Warwick SI,Mason P,Braun L,Halfhi	2004
Gf - Wild relatives	Zhu B,Lawrence JR,Warwick SI,Mason P,Braun L,Halfhi	2004
Gf - Wild relatives	Ammitzbøll H,Mikkelsen TN,Jørgensen RB	2005
Gf - Wild relatives	Armstrong TT,Fitzjohn RG,Newstrom LE,Wilton aD,Lee	2005
Gf - Wild relatives	Halfhill MD,Sutherland JP,Moon HS,Poppy GM,Warwick	2005
Gf - Wild relatives	Hudson LC,Halfhill MD,Stewart CN	2005
Gf - Wild relatives	Kaiser J	2005
Gf - Wild relatives	Légère A	2005
Gf - Wild relatives	Ortiz-García S,Ezcurra E,Schoel B,Acevedo F,Soberón	2005
Gf - Wild relatives	Raybould A,Cooper I	2005
Gf - Wild relatives	Saji H,Nakajima N,Aono M,Tamaoki M,Kubo A,Wakiyam	2005
Gf - Wild relatives	Ward M,Dick CW,Gribel R,Lowe AJ	2005
Gf - Wild relatives	Al-Ahmad H,Gressel J	2006
Gf - Wild relatives	Allainguillaume J,Alexander M,Bullock JM,Saunders M,A	2006

Gf - Wild relatives	Aono M,Wakiyama S,Nagatsu M,Nakajima N,Tamaoki M	2006
Gf - Wild relatives	Lee D,Natesan E	2006
Gf - Wild relatives	Mlynárová L,Conner AJ,Nap JP	2006
Gf - Wild relatives	Reichman JR,Watrud LS,Lee EH,Burdick CA,Bollman M	2006
Gf - Wild relatives	Schoenenberger N,Guadagnuolo R,Savova-Bianchi D,K	2006
Gf - Wild relatives	Sutherland JP,Justinova L,Poppy GM	2006
Gf - Wild relatives	Wang F,Yuan QH,Shi L,Qian Q,Liu WG,Kuang BG,Zeng	2006
Gf - Wild relatives	Darmency H,Vigouroux Y,Gestat De Garambé T,Richarc	2007
Gf - Wild relatives	Felber F,Kozlowski G,Arrigo N,Guadagnuolo R	2007
Gf - Wild relatives	Pfender W,Graw R,Bradley W,Carney M,Maxwell L	2007
Gf - Wild relatives	Van de Water PK,Watrud LS,Lee EH,Burdick C,King GA	2007
Gf - Wild relatives	Yuan Q,Shi L,Wang F,Cao B,Qian Q,Lei X,Liao Y,Liu W,	2007
Gf - Wild relatives	Zelaya IA,Owen MDK,Vangessel MJ	2007
Gf - Wild relatives	Bae TW,Vanjildorj E,Song SY,Nishiguchi S,Yang SS,Sor	2008
Gf - Wild relatives	Cummings JL,Handley LW,Macbryde B,Tupper SK,Wer	2008
Gf - Wild relatives	Dlugosch KM,Whitton J	2008
Gf - Wild relatives	Jhala AJ,Hall LM,Hall JC	2008
Gf - Wild relatives	Kawata M,Murakami K,Ishikawa T	2008
Gf - Wild relatives	Pasquet RS,Peltier A,Hufford MB,Oudin E,Saulnier J,Pa	2008
Gf - Wild relatives	Shi Y,Wang T,Li Y,Darmency H	2008
Gf - Wild relatives	Warwick SI,Légère A,Simard Mj,James T	2008
Gf - Wild relatives	Allainguillaume J,Harwood T,Ford CS,Cuccato G,Norris	2009
Gf - Wild relatives	Cao Q-J,Xia H,Yang X,Lu B-R	2009
Gf - Wild relatives	Devos Y,De Schrijver A,Reheul D	2009
Gf - Wild relatives	Di K,Stewart CN, Jr.,Wei W,Shen B-c,Tang Z-X,Ma K-P	2009
Gf - Wild relatives	Gressel J,Valverde BE	2009
Gf - Wild relatives	Laughlin KD,Power AG,Snow AA,Spencer LJ	2009
Gf - Wild relatives	Lu B-R,Yang C	2009
Gf - Wild relatives	Nishizawa T,Nakajima N,Aono M,Tamaoki M,Kubo A,Sa	2009
Gf - Wild relatives	PiÑEyro-Nelson A,Van Heerwaarden J,Perales HR,Serr	2009
Gf - Wild relatives	Schoel B,Fagan J	2009
Gf - Wild relatives	Snow A	2009
Gf - Wild relatives	Song X,Liu L,Wang Z,Qiang S	2009
Gf - Wild relatives	Warwick SI,Beckie HJ,Hall LM	2009
Gf - Wild relatives	Xia H,Lu B-R,Su J,Chen R,Rong J,Song Z,Wang F	2009
Gf - Wild relatives	Fitzpatrick BM,Johnson JR,Kump DK,Smith JJ,Voss SR,	2010
Gf - Wild relatives	Hooftman DAP,Hartman Y,Oostermeijer JGB,Den Nijs H	2010
Gf - Wild relatives	Hüsken A,Prescher S,Schiemann J	2010
Gf - Wild relatives	Kavanagh VB,Hall LM,Hall JC	2010
Gf - Wild relatives	Liu YB,Wei W,Ma KP,Darmency H	2010
Gf - Wild relatives	Londo JP,Bautista NS,Sagers CL,Lee EH,Watrud LS	2010
Gf - Wild relatives	Mizuguti A,Ohigashi K,Yoshimura Y,Kaga A,Kuroda Y,M	2010
Gf - Wild relatives	Moon HS,Li Y,Stewart Jr CN	2010
Gf - Wild relatives	Nishizawa T,Tamaoki M,Aono M,Kubo A,Saji H,Nakajim	2010
Gf - Wild relatives	Rong J,Janson S,Umehara M,Ono M,Vrieling K	2010
Gf - Wild relatives	Rong J,Song Z,De Jong TJ,Zhang X,Sun S,Xu X,Xia H,L	2010
Gf - Wild relatives	Sandhu S,Blount A,Quesenberry K,Altpeter F	2010
Gf - Wild relatives	Song X,Wang Z,Zuo J,Huangfu C,Qiang S	2010
Gf - Wild relatives	Willenborg C,Brûlé-Babel A,Van Acker R	2010
Gf - Wild relatives	Willenborg CJ,Brûlé-Babel AL,Van Acker RC	2010
Gf - Wild relatives	Wozniak CA,Martinez JC	2010
Gf - Wild relatives	Aono M,Wakiyama S,Nagatsu M,Kaneko Y,Nishizawa T,	2011
Gf - Wild relatives	Bravo-Almonacid F,Rudoy V,Welin B,Segretin M,Bedogr	2011
Gf - Wild relatives	Dyer GA,González C,Lopera DC	2011
Gf - Wild relatives	Kwit C,Moon HS,Warwick SI,Stewart Jr CN	2011
Gf - Wild relatives	Londo JP,Bollman MA,Sagers CL,Lee EH,Watrud LS	2011
Gf - Wild relatives	Londo JP,Bollman MA,Sagers CL,Lee EH,Watrud LS	2011
Gf - Wild relatives	Mallory-Smith CA,Sanchez Olguin E	2011
Gf - Wild relatives	Mayerhofer M,Mayerhofer R,Topinka D,Christianson J,G	2011

Gf - Wild relatives	Moon HS,Eda S,Saxton AM,Ow DW,Stewart CN,Stewart	2011
Gf - Wild relatives	Raybould A	2011
Gf - Wild relatives	Song X,Wang Z,Qiang S	2011
Gf - Wild relatives	Watrud LS,King G,Londo JP,Colasanti R,Smith BM,Was	2011
Gf - Wild relatives	Wegier A,Piñeyro-nelson A,Alarcón J,Gálvez-mariscal A	2011
Gf - Wild relatives	Zuo J,Zhang L,Song X,Dai W,Qiang S	2011
Gf - Wild relatives	DiFazio SP,Leonardi S,Slavov GT,Garman SL,Adams W.	2012
Gf - Wild relatives	Kitamoto N,Kaga A,Kuroda Y,Ohsawa R	2012
Gf - Wild relatives	Kwit C,Stewart CN	2012
Gf - Wild relatives	Liu C,Li J,Gao J,Shen Z,Lu B-R,Lin C	2012
Gf - Wild relatives	Snow AA	2012
Gf - Wild relatives	Yang X,Wang F,Su J,Lu B-R	2012
Gf - Wild relatives	Zapiola ML,Mallory-Smith CA	2012
Gf - HGT soil	Danniell H	2002
Gf - HGT soil	de Vries J,Wackernagel W	2002
Gf - HGT soil	Degand I,Laporte J,Pussemier L	2002
Gf - HGT soil	Gogarten JP,Doolittle WF,Lawrence JG	2002
Gf - HGT soil	Gyamfi S,Pfeifer U,Stierschneider M,Sessitsch A	2002
Gf - HGT soil	Kay E,Vogel TM,Bertolla F,Nalin R,Simonet P	2002
Gf - HGT soil	Normark BH,Normark S	2002
Gf - HGT soil	Saxena D,Flores S,Stotzky G	2002
Gf - HGT soil	Turner SL,Bailey MJ,Lilley AK,Thomas CM	2002
Gf - HGT soil	Ceccherini M,Pote J,Kay E,Van VT,Marechal J,Pietrame	2003
Gf - HGT soil	de Vries J,Heine M,Harms K,Wackernagel W	2003
Gf - HGT soil	Lilley AK,Bailey M,Barr M,Kilshaw K,Timms-Wilson TM,I	2003
Gf - HGT soil	Meier P,Wackernagel W	2003
Gf - HGT soil	Nielsen KM	2003
Gf - HGT soil	Tepfer D,Garcia-Gonzales R,Mansouri H,Seruga M,Mes	2003
Gf - HGT soil	Badosa E,Moreno C,Montesinos E	2004
Gf - HGT soil	Heinemann JA,Traavik T	2004
Gf - HGT soil	Nielsen KM,Townsend JP	2004
Gf - HGT soil	Broothaerts W,Mitchell JH,Weir B,Kaines S,Smith LMA,'	2005
Gf - HGT soil	Guan J,Spencer JL,Ma BL	2005
Gf - HGT soil	Gulden RH,Leart S,Hart MM,Powell JR,Trevors JT,Pauls	2005
Gf - HGT soil	Lerat S,England LS,Vincent ML,Pauls KP,Swanton CJ,K	2005
Gf - HGT soil	Ray JL,Nielsen KM	2005
Gf - HGT soil	Sørensen JS,Bailey M,Hansen LH,Kroer N,Wuertz S	2005
Gf - HGT soil	Thomas CM,Nielsen KM	2005
Gf - HGT soil	D'Costa VM,McGrann KM,Hughes DW,Wright GD	2006
Gf - HGT soil	Lerat S,Gulden RH,Hart MM,Powell JR,England LS,Paul	2007
Gf - HGT soil	Lo C-C,Chen S-C,Yang J-Z	2007
Gf - HGT soil	Monier J-M,Bernillon D,Kay E,Faugier A,Rybalka O,Dess	2007
Gf - HGT soil	Nielsen KM,Johnsen PJ,Bensasson D,Daffonchio D	2007
Gf - HGT soil	Pontiroli A,Simonet P,Frostegard A,Vogel TM,Monier J-M	2007
Gf - HGT soil	Poté J,Rosselli W,Wigger A,Wildi W	2007
Gf - HGT soil	Simpson DJ,Dawson LF,Fry JC,Rogers HJ,Day MJ	2007
Gf - HGT soil	Simpson DJ,Fry JC,Rogers HJ,Day MJ	2007
Gf - HGT soil	Brusetti L,Rizzi A,Abruzzese A,Sacchi GA,Ragg E,Bazzi	2008
Gf - HGT soil	Demanèche S,Sanguin H,Poté J,Navarro E,Bernillon D,I	2008
Gf - HGT soil	Gulden RH,Lerat S,Blackshaw RE,Powell JR,Levy-Booth	2008
Gf - HGT soil	Kaiser C,Bachmeier B,Conrad C,Nerlich A,Bratzke H,Eis	2008
Gf - HGT soil	Keese P	2008
Gf - HGT soil	Levy-Booth DJ,Campbell RG,Gulden RH,Hart MM,Powe	2008
Gf - HGT soil	Rizzi A,Pontiroli A,Brusetti L,Borin S,Sorlini C,Abruzzese	2008
Gf - HGT soil	Sheu C,Wu C-Y,Chen S-C,Lo C-C	2008
Gf - HGT soil	Bonadei M,Balestrazzi A,Frigerio B,Carbonera D	2009
Gf - HGT soil	Levy-Booth DJ,Gulden RH,Campbell RG,Powell JR,Klirc	2009
Gf - HGT soil	Pontiroli A,Rizzi A,Simonet P,Daffonchio D,Vogel TM,Mc	2009
Gf - HGT soil	Poté J,Ackermann R,Wildi W	2009

Gf - HGT soil	Bravo AG,Wildi W,Poté J	2010
Gf - HGT soil	Brigulla M,Wackernagel W	2010
Gf - HGT soil	Pontiroli A,Ceccherini M-T,Poté J,Wildi W,Kay E,Nannip	2010
Gf - HGT soil	Poté J,Teresa Ceccherini M,Rosselli W,Wildi W,Simone	2010
Gf - HGT soil	Zhu B,Ma B-L,Blackshaw RE	2010
Gf - HGT soil	Demanèche S,Brard C,Lima O,Binet F,Simonet P	2011
Gf - HGT soil	Demanèche S,Monier JM,Dugat-Bony E,Simonet P	2011
Gf - HGT soil	Isaza LA,Opelt K,Wagner T,Mattes E,Bieber E,Hatley EC	2011
Gf - HGT soil	Ma BL,Blackshaw RE,Roy J,He T	2011
Gf - HGT soil	Talianova M,Janousek B	2011
Gf - HGT soil	Yeom J,Yunho L,Noh J,Jung J,Park J,Seo H,Kim J,Han	2011
Gf - HGT soil	Forsberg KJ,Reyes A,Wang B,Selleck EM,Sommer MO/	2012
Gf - HGT soil	Zhang X,Nesme J,Simonet P,Frostegård Å	2012
Non-targetted asse	Cockburn A	2002
Non-targetted asse	Hollingworth RM,Bjeldanes LF,Bolger M,Kimber I,Meade	2003
Non-targetted asse	Kuiper HA,Kok EJ,Engel K-H	2003
Non-targetted asse	Le Gall G,Colquhoun IJ,Davis AL,Collins GJ,Verhoeyen	2003
Non-targetted asse	Cellini F,Chesson A,Colquhoun I,Constable A,Davies H\	2004
Non-targetted asse	Charlton A,Allnutt T,Holmes S,Chisholm J,Bean S,Ellis N	2004
Non-targetted asse	Defernez M,Gunning YM,Parr AJ,Shepherd LVT,Davies	2004
Non-targetted asse	Manetti C,Bianchetti C,Bizzarri M,Casciani L,Castro C,D'	2004
Non-targetted asse	Catchpole GS,Beckmann M,Enot DP,Mondhe M,Zywicki	2005
Non-targetted asse	Garratt LC,Linforth R,Taylor AJ,Lowe KC,Power JB,Dave	2005
Non-targetted asse	Gregersen P,Brinch-Pedersen H,Holm P	2005
Non-targetted asse	Huang S,Kruger DE,Frizzi A,D'Ordine RL,Florida CA,Ada	2005
Non-targetted asse	Kristensen C,Morant M,Olsen CE,Ekstrøm CT,Galbraith	2005
Non-targetted asse	Lehesranta SJ,Davies HV,Shepherd LVT,Nunan N,McNi	2005
Non-targetted asse	Ouakfaoui SE,Miki B	2005
Non-targetted asse	Poerschmann J,Gathmann A,Augustin J,Langer U,Górec	2005
Non-targetted asse	Tagashira N,Plader W,Filipecki M,Yin Z,Wiśniewska A,G	2005
Non-targetted asse	Baker JM,Hawkins ND,Ward JL,Lovegrove A,Napier JA,	2006
Non-targetted asse	Baudo MM,Lyons R,Powers S,Pastori GM,Edwards KJ,H	2006
Non-targetted asse	Horváth-Szanics E,Szabó Z,Janáky T,Pauk J,Hajós G	2006
Non-targetted asse	Lay Jr JO,Liyanage R,Borgmann S,Wilkins CL	2006
Non-targetted asse	Long M,Millar DJ,Kimura Y,Donovan G,Rees J,Fraser PI	2006
Non-targetted asse	Manetti C,Bianchetti C,Casciani L,Castro C,Di Cocco ME	2006
Non-targetted asse	Metzdorff SB,Kok EJ,Knuthsen P,Pedersen J	2006
Non-targetted asse	Rischer H,Oksman-Caldentey K-M	2006
Non-targetted asse	Roy S,Sen CK	2006
Non-targetted asse	Shepherd L,McNicol J,Razzo R,Taylor M,Davies H	2006
Non-targetted asse	Wakasa K,Hasegawa H,Nemoto H,Matsuda F,Miyazawa	2006
Non-targetted asse	Albo GA,Mila S,Digilio G,Motto M,Aime S,Corpillo D	2007
Non-targetted asse	Castro C,Manetti C	2007
Non-targetted asse	Dubouzet JG,Ishihara A,Matsuda F,Miyagawa H,Iwata H	2007
Non-targetted asse	Fraser PD,Enfissi EMA,Halket JM,Truesdale MR,Yu D,G	2007
Non-targetted asse	Ioset J-R,Urbaniak B,Ndjoko-Ioset K,Wirth J,Martin F,Gr	2007
Non-targetted asse	Ishihara A,Matsuda F,Miyagawa H,Wakasa K	2007
Non-targetted asse	Molkentin J,Giesemann A	2007
Non-targetted asse	Rodríguez-Nogales JM,Cifuentes A,García MC,Marina M	2007
Non-targetted asse	Shewry PR,Baudo M,Lovegrove A,Powers S,Napier JA,\	2007
Non-targetted asse	Batista R,Saibo N,Lourenço T,Oliveira MM	2008
Non-targetted asse	Bellaloui N,Zablotowicz RM,Reddy KN,Abel CA	2008
Non-targetted asse	Castro C,Motto M,Rossi V,Manetti C	2008
Non-targetted asse	Cheng KC,Beaulieu J,Iquira E,Belzile FJ,Fortin MG,Strör	2008
Non-targetted asse	Coll A,Nadal A,Palaudelmàs M,Messeguer J,Melé E,Puig	2008
Non-targetted asse	García-Villalba R,León C,Dinelli G,Segura-Carretero A,F	2008
Non-targetted asse	Hoekenga OA	2008
Non-targetted asse	Kiambi DK,Fortin M,Stromvick M	2008
Non-targetted asse	Levandi T,Leon C,Kaljurand M,Garcia-Cañas V,Cifuente	2008

Non-targetted asse	Zhu J,Patzoldt WL,Shealy RT,Vodkin LO,Clough SJ,Trai 2008
Non-targetted asse	Zolla L,Rinalducci S,Antonioli P,Righetti PG 2008
Non-targetted asse	Abdeen A,Miki B 2009
Non-targetted asse	Baudo MM,Powers SJ,Mitchell RAC,Shewry PR 2009
Non-targetted asse	Beale MH,Ward JL,Baker JM 2009
Non-targetted asse	Beatty PH,Shrawat AK,Carroll RT,Zhu T,Good AG 2009
Non-targetted asse	Chen H,Bodulovic G,Hall PJ,Moore A,Higgins TJV,Djord 2009
Non-targetted asse	Coll A,Nadal A,Collado R,Capellades G,Messeguer J,Me 2009
Non-targetted asse	Duarte IF,Lamego I,Rocha C,Gil AM 2009
Non-targetted asse	Islam N,Campbell PM,Higgins TJV,Hirano H,Akhurst RJ 2009
Non-targetted asse	Kim H,Kim S,Park Y,Kwon S,Liu J,Joung H,Jeon J 2009
Non-targetted asse	Lao Y-M,Jiang J-G,Yan L 2009
Non-targetted asse	Leon C,Rodriguez-Meizoso I,Lucio M,Garcia-Cañas V,Ib 2009
Non-targetted asse	Lovegrove A,Salt L,Shewry PR 2009
Non-targetted asse	Miki B,Abdeen A,Manabe Y,MacDonald P 2009
Non-targetted asse	Paz JL,Vicient C,Puigdomènech P,Pla M 2009
Non-targetted asse	Piccioni F,Capitani D,Zolla L,Mannina L 2009
Non-targetted asse	Pischetsrieder M,Baeuerlein R 2009
Non-targetted asse	Ren Y,Wang T,Peng Y,Xia B,Qu L-J 2009
Non-targetted asse	Zhou J,Ma C,Xu H,Yuan K,Lu X,Zhu Z,Wu Y,Xu G 2009
Non-targetted asse	Abdeen A,Schnell J,Miki B 2010
Non-targetted asse	Anttonen MJ,Lehesranta S,Auriola S,Röhlig RM,Engel K 2010
Non-targetted asse	Asanuma Y,Jinkawa T,Tanaka H,Gondo T,Zaita N,Akasl 2010
Non-targetted asse	Barros E,Lezar S,Anttonen MJ,Van Dijk JP,Röhlig RM,K 2010
Non-targetted asse	Batista R,Oliveira M 2010
Non-targetted asse	Chassy BM 2010
Non-targetted asse	Coll A,Nadal A,Collado R,Capellades G,Kubista M,Mess 2010
Non-targetted asse	Davies HV,Shepherd LVT,Stewart D,Frank T,Röhlig RM, 2010
Non-targetted asse	Dijk JPv,Leifert C,Barros E,Kok EJ 2010
Non-targetted asse	Doerrer N,Ladics G,McClain S,Herouet-Guicheney C,Po 2010
Non-targetted asse	Jiao Z,Si X-x,Li G-k,Zhang Z-m,Xu X-p 2010
Non-targetted asse	Kogel K-H,Voll LM,Schäfer P,Jansen C,Wu Y,Langen G, 2010
Non-targetted asse	Matsuda F,Ishihara A,Takanashi K,Morino K,Miyazawa H 2010
Non-targetted asse	Patterson AD,Gonzalez FJ,Idle JR 2010
Non-targetted asse	Paz J,Pla M,Papazova N,Puigdomènech P,Vicient C 2010
Non-targetted asse	Paz JLL,Pla M,Papazova N,Puigdomènech P,Vicient CM 2010
Non-targetted asse	Röhlig RM,Engel K-H 2010
Non-targetted asse	Sobolev AP,Capitani D,Giannino D,Nicolodi C,Testone C 2010
Non-targetted asse	Tahar SB,Salva I,Brants IO 2010
Non-targetted asse	Balsamo GM,Cangahuala-Inocente GC,Bertoldo JB,Tere 2011
Non-targetted asse	Coll A,Nadal A,Rossignol M,Puigdomènech P,Pla M 2011
Non-targetted asse	D'Alessandro A,Zolla L 2011
Non-targetted asse	García-Cañas V,Simó C,León C,Ibáñez E,Cifuentes A 2011
Non-targetted asse	Godin J-P,McCullagh JSO 2011
Non-targetted asse	Heinemann JA,Kurenbach B,Quist D 2011
Non-targetted asse	Herrero M,Simó C,García-Cañas V,Ibáñez E,Cifuentes A 2011
Non-targetted asse	Kim HK,Choi YH,Verpoorte R 2011
Non-targetted asse	Kusano M,Redestig H,Hirai T,Oikawa A,Matsuda F,Fuku 2011
Non-targetted asse	Llorente B,Alonso GD,Bravo-Almonacid F,Rodríguez V,L 2011
Non-targetted asse	Malet-Martino M,Holzgrabe U 2011
Non-targetted asse	Montero M,Coll A,Nadal A,Messeguer J,Pla M 2011
Non-targetted asse	Picone G,Mezzetti B,Babini E,Capocasa F,Placucci G,C 2011
Non-targetted asse	Ricroch AE,Bergé JB,Kuntz M 2011
Non-targetted asse	Robinson AB,Robinson NE 2011
Non-targetted asse	Barbosa HS,Arruda SCC,Azevedo RA,Arruda MAZ 2012
Non-targetted asse	Chang Y,Zhao C,Zhu Z,Wu Z,Zhou J,Zhao Y,Lu X,Xu G 2012
Non-targetted asse	Frank T,Röhlig RM,Davies HV,Barros E,Engel K-H 2012
Non-targetted asse	Gong CY,Li Q,Yu HT,Wang Z,Wang T 2012
Non-targetted asse	Liu Z,Zhao J,Li Y,Zhang W,Jian G,Peng Y,Qi F 2012

Non-targetted asse	Plischke A,Choi YH,Brakefield PM,Klinkhamer PGL,Brui	2012
Non-targetted asse	Wu J,Yu H,Dai H,Mei W,Huang X,Zhu S,Peng M	2012
Equivalence	Esposito F,Fogliano V,Cardi T,Carputo D,Filippone E	2002
Equivalence	Kuiper HA,Kleter GA,Noteborn HPJM,Kok EJ	2002
Equivalence	Ridley WP,Sidhu RS,Pyla PD,Nemeth MA,Breeze ML,As	2002
Equivalence	Kok EJ,Kuiper HA	2003
Equivalence	George C,Ridley WP,Obert JC,Nemeth MA,Breeze ML,A	2004
Equivalence	Hamilton KA,Pyla PD,Breeze M,Olson T,Li M,Robinson I	2004
Equivalence	Herman RA,Phillips AM,Collins RA,Tagliani LA,Clausser	2004
Equivalence	Obert JC,Ridley WP,Schneider RW,Riordan SG,Nemeth	2004
Equivalence	Kelly L	2005
Equivalence	McCann MC,Liu K,Trujillo WA,Dobert RC	2005
Equivalence	Oberdoerfer RB,Shillito RD,de Beuckeleer M,Mitten DH	2005
Equivalence	Baker JM,Hawkins ND,Ward JL,Lovegrove A,Napier JA,	2006
Equivalence	Colquhoun IJ,Le Gall G,Elliott KA,Mellon FA,Michael AJ	2006
Equivalence	Hothorn LA,Oberdoerfer R	2006
Equivalence	McCann MC,Rogan GJ,Fitzpatrick S,Trujillo WA,Sorbet I	2006
Equivalence	Oecd	2006
Equivalence	Tang M,Huang K,Zhou K,Li X,He X,Luo Y	2006
Equivalence	Harrigan GG,Ridley WP,Riordan SG,Nemeth MA,Sorbet	2007
Equivalence	Herman RA,Storer NP,Phillips AM,Prochaska LM,Winde	2007
Equivalence	McCann MC,Trujillo WA,Riordan SG,Sorbet R,Bogdanov	2007
Equivalence	Drury SM,Reynolds TL,Ridley WP,Bogdanova N,Riordar	2008
Equivalence	Glenn KC	2008
Equivalence	Kier LD,Petrick JS	2008
Equivalence	Lundry DR,Ridley WP,Meyer JJ,Riordan SG,Nemeth MA	2008
Equivalence	Malowicki SMM,Martin R,Qian MC	2008
Equivalence	Venneria E,Fanasca S,Monastra G,Finotti E,Ambra R,Az	2008
Equivalence	Harrigan GG,Ridley WP,Miller KD,Sorbet R,Riordan SG,	2009
Equivalence	Herman RA,Chassy BM,Parrott W	2009
Equivalence	Berman KH,Harrigan GG,Riordan SG,Nemeth MA,Hans	2010
Equivalence	Harrigan GG,Glenn KC,Ridley WP	2010
Equivalence	Harrigan GG,Lundry D,Drury S,Berman K,Riordan SG,N	2010
Equivalence	Herman RA,Phillips AM,Lepping MD,Fast BJ,Sabbatini J	2010
Equivalence	Khalf M,Goulet C,Vorster J,Brunelle F,Anguenot R,Fliss	2010
Equivalence	Zeller SL,Kalinina O,Brunner S,Keller B,Schmid B	2010
Equivalence	Zobiole LHS,Oliveira RS,Visentainer JV,Kremer RJ,Bella	2010
Equivalence	Berman KH,Harrigan GG,Nemeth MA,Oliveira WS,Berge	2011
Equivalence	Harrison JM,Breeze ML,Harrigan GG	2011
Equivalence	Ridley WP,Harrigan GG,Breeze ML,Nemeth MA,Sidhu F	2011
Equivalence	van der Voet H,Perry J,Amzal B,Paoletti C	2011
Equivalence	van der Voet H,Perry JN,Amzal B,Paoletti C	2011
Equivalence	Zhou J,Berman KH,Breeze ML,Nemeth MA,Oliveira WS,	2011
Equivalence	Zhou J,Harrigan GG,Berman KH,Webb EG,Klusmeyer T	2011
Equivalence	Beckles DM,Tananuwong K,Shoemaker CF	2012
Equivalence	Harrigan GG,Harrison JM	2012
Equivalence	Qin F,Kang L,Guo L,Lin J,Song J,Zhao Y	2012
Equivalence	Ward KJ,Nemeth MA,Brownie C,Hong B,Herman RA,Ob	2012
Consumption	Andrew C	2002
Consumption	Bucchini L,Goldman LR	2002
Consumption	Chambers PA,Duggan PS,Heritage J,Forbes JM	2002
Consumption	Chassy BM	2002
Consumption	Cromwell GL,Lindemann MD,Randolph JH,Parker GR,C	2002
Consumption	Folmer JD,Grant RJ,Milton CT,Beck J	2002
Consumption	Harlander SK	2002
Consumption	Hefle SL,Taylor SL	2002
Consumption	Helm RM	2002
Consumption	Heritage J	2002
Consumption	Hino A	2002

Consumption	Kharazmi M,Hammes WP,Hertel C	2002
Consumption	Kimber I,Dearman RJ	2002
Consumption	Malatesta M,Caporaloni C,Gavaudan S,Rocchi MBL,Ser	2002
Consumption	Malatesta M,Caporaloni C,Rossi L,Battistelli S,Rocchi MI	2002
Consumption	Martín-Orúe SM,O'Donnell AG,Ariño J,Netherwood T,Gil	2002
Consumption	Moseley BEB	2002
Consumption	Murai A,Kobayashi T,Okada T,Okumura J	2002
Consumption	Nair RS,Fuchs RL,Schuette SA	2002
Consumption	Okunuki H,Teshima R,Shigeta T,Sakushima J-i,Akiyama	2002
Consumption	Pastorello EA,Pravettoni V,Calamari AM,Banfi E,Robino	2002
Consumption	Poulsen LK	2002
Consumption	Privalle LS	2002
Consumption	Reuter T,Aulrich K,Berk A,Flachowsky G	2002
Consumption	Taylor SL	2002
Consumption	Taylor SL,Hefle SL	2002
Consumption	Taylor SL,Hefle SL,Bindslev-Jensen C,Bock SA,Burks A	2002
Consumption	Teshima R,Watanabe T,Okunuki H,Isuzugawa K,Akiyam	2002
Consumption	Wang Z-h,Wang Y,Cui H-r,Xia Y-w,Altosaar I,Shu Q-y	2002
Consumption	Warner JO	2002
Consumption	Zorzet A,Gustafsson M,Hammerling U	2002
Consumption	Bakshi A	2003
Consumption	Bernstein JA,Bernstein IL,Bucchini L,Goldman LR,Hamil	2003
Consumption	Brake J,Faust MA,Stein J	2003
Consumption	Chang HS,Kim NH,Park MJ,Lim SK,Kim SC,Kim JY,Kim	2003
Consumption	Chen Z-L,Gu H,Li Y,Su Y,Wu P,Jiang Z,Ming X,Tian J,P	2003
Consumption	Chowdhury EH,Kuribara H,Hino A,Sultana P,Mikami O,S	2003
Consumption	Chowdhury EH,Mikami O,Nakajima Y,Hino A,Kuribara H	2003
Consumption	Donkin SS,Velez JC,Totten AK,Stanisiewski EP,Hartnell	2003
Consumption	Duggan PS,Chambers PA,Heritage J,Forbes JM	2003
Consumption	Forsman A,Ushameckis D,Bindra A,Yun Z,Blomberg J	2003
Consumption	Germolec DR,Kimber I,Goldman L,Selgrade M	2003
Consumption	Grant RJ,Fanning KC,Kleinschmit D,Stanisiewski EP,Ha	2003
Consumption	Helm RM	2003
Consumption	Herman EM	2003
Consumption	Herman EM,Helm RM,Jung R,Kinney AJ	2003
Consumption	Ipharraguerre IR,Younker RS,Clark JH,Stanisiewski EP,I	2003
Consumption	Jank B,Haslberger AG	2003
Consumption	Jennings JC,Albee LD,Kolwyck DC,Surber JB,Taylor ML	2003
Consumption	Jennings JC,Kolwyck DC,Kays SB,Whetsell AJ,Surber J	2003
Consumption	Kharazmi M,Sczesny S,Blaut M,Hammes WP,Hertel C	2003
Consumption	Ladics GS,Holsapple MP,Astwood JD,Kimber I,Knippels	2003
Consumption	Malatesta M,Biggiogera M,Manuali E,Rocchi MBL,Baldel	2003
Consumption	Metcalfe DD	2003
Consumption	Pryme IF,Lembcke R	2003
Consumption	Pusztai A,Bardocz S,Ewen SWB	2003
Consumption	Raybourne RB,Williams KM,Vogt R,Reissman DB,Winte	2003
Consumption	Society of t	2003
Consumption	Taylor ML,Hyun Y,Hartnell GF,Riordan SG,Nemeth MA,I	2003
Consumption	Taylor SL	2003
Consumption	Tony MA,Butschke A,Broll H,Grohmann L,Zagon J,Halle	2003
Consumption	Tryphonas H,Arvanitakis G,Vavasour E,Bondy G	2003
Consumption	Alexander TW,Sharma R,Deng MY,Whetsell AJ,Jenning	2004
Consumption	Brake DG,Evenson DP	2004
Consumption	Castillo AR,Gallardo MR,Maciel M,Giordano JM,Conti G,	2004
Consumption	Chowdhury EH,Mikami O,Murata H,Sultana P,Shimada I	2004
Consumption	El Sanhoty R,Abd El-Rahman AA,Bögl KW	2004
Consumption	Freese W,Schubert D	2004
Consumption	Hammond B,Dudek R,Lemen J,Nemeth M	2004
Consumption	Lehrer SB	2004

Consumption	Maleki SJ	2004
Consumption	Nemeth A,Wurz A,Artim L,Charlton S,Dana G,Glenn K,H	2004
Consumption	Netherwood T,Martin-Orue SM,O'Donnell AG,Gockling S	2004
Consumption	Poulsen LK	2004
Consumption	Roush WB,Tozer PR	2004
Consumption	Sharma R,Alexander TW,John SJ,Forster RJ,McAllister	2004
Consumption	Siruguri V,Sesikeran B,Bhat RV	2004
Consumption	Sten E,Skov PS,Andersen SB,Torp AM,Olesen A,Bindsl	2004
Consumption	Swamy HVLN,Smith TK,MacDonald EJ	2004
Consumption	van den Eede G,Aarts H,Buhk HJ,Corthier G,Flint HJ,Ha	2004
Consumption	Vecchio L,Cisterna B,Malatesta M,Martin TE,Biggiogera	2004
Consumption	Wilcks A,van Hoek AHAM,Joosten RG,Jacobsen BBL,A	2004
Consumption	Zhu Y,Li D,Wang F,Yin J,Jin H	2004
Consumption	Aeschbacher K,Messikommer R,Meile L,Wenk C	2005
Consumption	Batista R,Nunes B,Carmo M,Cardoso C,José HS,de Alm	2005
Consumption	Bertoni G,Marsan PA	2005
Consumption	Crevel R	2005
Consumption	Cromwell GL,Henry BJ,Scott AL,Gerngross MF,Dusek D	2005
Consumption	Davies HV	2005
Consumption	Deaville ER,Maddison BC	2005
Consumption	Flachowsky G,Chesson A,Aulrich K	2005
Consumption	Flachowsky G,Halle I,Aulrich K	2005
Consumption	Gay PBaGSH	2005
Consumption	Goodman RE,Hefle SL	2005
Consumption	Goodman RE,Hefle SL,Taylor SL,van Ree R	2005
Consumption	Hartnell GF,Hvelplund T,Weisbjerg MR	2005
Consumption	Lehrer SB,Bannon GA	2005
Consumption	Lutz B,Wiedemann S,Einspanier R,Mayer J,Albrecht C	2005
Consumption	Malatesta M,Tiberi C,Baldelli B,Battistelli S,Manuali E,Bi	2005
Consumption	Mazza R,Soave M,Morlacchini M,Piva G,Marocco A	2005
Consumption	Obermeyer G,Ferreira F	2005
Consumption	Petit L,Baraige F,Bertheau Y,Brunschwig P,Diolez A,Dul	2005
Consumption	Phipps RH,Jones AK,Tingey AP,Abeyasekera S	2005
Consumption	Pol KJV,Erickson GE,Robbins ND,Berger LL,Wilson CB,	2005
Consumption	Rossi F,Morlacchini M,Fusconi G,Pietri A,Mazza R,Piva	2005
Consumption	Seek Rhee G,Hyun Cho D,Hyuck Won Y,Hyun Seok J,S	2005
Consumption	Wolff JA,Budker V	2005
Consumption	Yum H-Y,Lee S-Y,Lee K-E,Sohn M-H,Kim K-E	2005
Consumption	Alexander TW,Reuter T,Okine E,Sharma R,McAllister TA	2006
Consumption	Baranowski A,Rosochacki S,Parada R,Jaszczak K,Zimn	2006
Consumption	Beagle JM,Apgar GA,Jones KL,Griswold KE,Radcliffe JS	2006
Consumption	Chainark P,Satoh S,Hino T,Kiron V,Hirono I,Aoki T	2006
Consumption	Gibson J	2006
Consumption	Gizzarelli F,Corinti S,Barletta B,Iacovacci P,Brunetto B,E	2006
Consumption	Hammond B,Lemen J,Dudek R,Ward D,Jiang C,Nemeth	2006
Consumption	Hammond BG,Dudek R,Lemen JK,Nemeth MA	2006
Consumption	Herman RA,Storer NP,Gao Y	2006
Consumption	Kim S-H,Kim H-M,Ye Y-M,Kim S-H,Nahm D-H,Park H-S,	2006
Consumption	Koch M,Strobel E,Tebbe CC,Heritage J,Breves G,Huber	2006
Consumption	Lee LA,Burks AW	2006
Consumption	Lutz B,Wiedemann S,Albrecht C	2006
Consumption	Orruño E,Morgan MRA	2006
Consumption	Prescott VE,Hogan SP	2006
Consumption	Regina A,Bird A,Topping D,Bowden S,Freeman J,Barsby	2006
Consumption	Ricard G,McEwan NR,Dutilh BE,Jouany J-P,Macheboeu	2006
Consumption	Sharma R,Damgaard D,Alexander TW,Dugan MER,Aalh	2006
Consumption	Taylor SL	2006
Consumption	Wiedemann S,Lutz B,Kurtz H,Schwarz FJ,Albrecht C	2006
Consumption	Bakke-McKellep AM,Koppang EO,Gunnes G,Sanden M,	2007

Consumption	Bannon GA,Martino-Catt S	2007
Consumption	Batista R,Martins I,Jenö P,Ricardo CP,Oliveira MM	2007
Consumption	Calsamiglia S,Hernandez B,Hartnell GF,Phipps R	2007
Consumption	Delaney B	2007
Consumption	Domingo JL	2007
Consumption	Doull J,Gaylor D,Greim HA,Lovell DP,Lynch B,Munro IC	2007
Consumption	Faust M,Smith B,Rice D,Owens F,Hinds M,Dana G,Hun	2007
Consumption	Ferrini AM,Mannoni V,Pontieri E,Pourshaban M	2007
Consumption	Flachowsky G,Aulrich K,Böhme H,Halle I	2007
Consumption	Hoff M,Son DY,Gubesch M,Ahn K,Lee SI,Vieths S,Good	2007
Consumption	Knudsen I,Poulsen M	2007
Consumption	MacKenzie SA,Lamb I,Schmidt J,Deege L,Morrisey MJ,H	2007
Consumption	Malley LA,Everds NE,Reynolds J,Mann PC,Lamb I,Rooc	2007
Consumption	McNaughton J,Roberts M,Smith B,Rice D,Hinds M,Schm	2007
Consumption	Nakajima O,Teshima R,Takagi K,Okunuki H,Sawada J-i	2007
Consumption	Poulsen M,Kroghsbo S,Schrøder M,Wilcks A,Jacobsen I	2007
Consumption	Poulsen M,Schrøder M,Wilcks A,Kroghsbo S,Lindecrona	2007
Consumption	Ronchetti R,Kaczmarski MG,Hałuszka J,Jesenak M,Villa	2007
Consumption	Sapkota AR,Lefferts LY,McKenzie S,Walker P	2007
Consumption	Schrøder M,Poulsen M,Wilcks A,Kroghsbo S,Miller A,Fre	2007
Consumption	Séralini G-E,Cellier D,Vendomois JS	2007
Consumption	Taylor M,Hartnell G,Lucas D,Davis S,Nemeth M	2007
Consumption	Wiedemann S,Gürtler P,Albrecht C	2007
Consumption	Aalberse RC	2008
Consumption	Appenzeller LM,Munley SM,Hoban D,Sykes GP,Malley L	2008
Consumption	Bakke-McKellep AM,Sanden M,Danieli A,Acierno R,Herr	2008
Consumption	Barber D,RodrÃ-guez R,Salcedo G	2008
Consumption	Bondzio A,Stumpff F,SchÃ¶n J,Martens H,Einspanier R	2008
Consumption	Chainark P,Satoh S,Hirono I,Aoki T,Endo M	2008
Consumption	Chen M,Ye G-y,Liu Z-c,Fang Q,Hu C,Peng Y-f,Shelton A	2008
Consumption	Cisterna B,Flach F,Vecchio L,Barabino SML,Battistelli S,	2008
Consumption	Daunert S,Deo S,Morin X,Roda A	2008
Consumption	De Luis R,Pérez MD,Sánchez L,Lavilla M,Calvo M	2008
Consumption	Delaney B,Appenzeller LM,Munley SM,Hoban D,Sykes C	2008
Consumption	Delaney B,Astwood JD,Cunny H,Conn RE,Herouet-Guic	2008
Consumption	Delaney B,Zhang J,Carlson G,Schmidt J,Stagg B,Comst	2008
Consumption	Deng P,Zhou X,Zhou P,Du Z,Hou H,Yang D,Tan J,Wu X	2008
Consumption	Désert C,Duclos MJ,Blavy P,Lecerf F,Moreews F,Klopp	2008
Consumption	Efsa	2008
Consumption	Finamore A,Roselli M,Britti S,Monastra G,Ambra R,Turri	2008
Consumption	Goodman RE,Vieths S,Sampson HA,Hill D,Ebisawa M,T	2008
Consumption	He XY,Huang KL,Li X,Qin W,Delaney B,Luo YB	2008
Consumption	Holzhauser T,Ree Rv,Poulsen LK,Bannon GA	2008
Consumption	Jacobs CM,Utterback PL,Parsons CM,Rice D,Smith B,H	2008
Consumption	Kılıç A,Akay MT	2008
Consumption	Kroghsbo S,Madsen C,Poulsen M,Schrøder M,Kvist PH,	2008
Consumption	Lemaux PG	2008
Consumption	Magaña-Gómez JA,Cervantes GL,Yepiz-Plascencia G,B	2008
Consumption	Malatesta M,Boraldi F,Annovi G,Baldelli B,Battistelli S,Bi	2008
Consumption	McNaughton J,Roberts M,Smith B,Rice D,Hinds M,Rood	2008
Consumption	McNaughton J,Roberts M,Smith B,Rice D,Hinds M,Sand	2008
Consumption	Ofori-Anti AO,Ariyarathna H,Chen L,Lee HL,Pramod SN	2008
Consumption	Onose J-i,Imai T,Hasumura M,Ueda M,Ozeki Y,Hirose M	2008
Consumption	Paul V,Steinke K,Meyer HHD	2008
Consumption	Sakamoto Y,Tada Y,Fukumori N,Tayama K,Ando H,Taka	2008
Consumption	Schubert DR	2008
Consumption	Singh AK,Singh BP,Prasad GBKS,Gaur SN,Arora N	2008
Consumption	Trabalza-Marinucci M,Brandi G,Rondini C,Avellini L,Giar	2008
Consumption	Zurbrügg C,Nentwig W	2008

Consumption	Aldemir H,Bars R,Herouet-Guicheney C	2009
Consumption	Appenzeller LM,Malley L,MacKenzie SA,Hoban D,Delan	2009
Consumption	Appenzeller LM,Munley SM,Hoban D,Sykes GP,Malley L	2009
Consumption	Bertheau Y,Helbling JC,Fortabat MN,Makhzami S,Sotine	2009
Consumption	Cantani A	2009
Consumption	Daleprane JB,Feijó TS,Boaventura GT	2009
Consumption	Daleprane JB,Pacheco JT,Boaventura GT	2009
Consumption	de Vendômois JS,Roullier F,Cellier D,Séralini G-E	2009
Consumption	Domon E,Takagi H,Hirose S,Sugita K,Kasahara S,Ebinu	2009
Consumption	Dona A,Arvanitoyannis IS	2009
Consumption	Fallarero A,Ainasoja M,Sandberg M,Teeri TH,Vuorela PI	2009
Consumption	Haryu Y,Taguchi Y,Itakura E,Mikami O,Miura K,Saeki T,I	2009
Consumption	He XY,Tang MZ,Luo YB,Li X,Cao SS,Yu JJ,Delaney B,H	2009
Consumption	Herouet-Guicheney C,Rouquié D,Freyssinet M,Currier T	2009
Consumption	Hirao T,Watanabe S,Temmei Y,Hiramoto M,Kato H	2009
Consumption	Ivashuta SI,Petrick JS,Heisel SE,Zhang Y,Guo L,Reynol	2009
Consumption	Juberg DR,Herman RA,Thomas J,Brooks KJ,Delaney B	2009
Consumption	Ka S,Lindberg J,Strömstedt L,Fitzsimmons C,Lindqvist M	2009
Consumption	Ladics GS,Selgrade MK	2009
Consumption	Magaña-Gómez JA,Calderón de la Barca AM	2009
Consumption	Mathesius CA,Barnett Jr JF,Cressman RF,Ding J,Carpe	2009
Consumption	Mohanta RK,Singhal KK,Tyagi AK,Rajput YS,Prasad S	2009
Consumption	Parrot W,Chassy B	2009
Consumption	Paschke A	2009
Consumption	Rickard C	2009
Consumption	Scheurer S,Sonnewald S	2009
Consumption	Selgrade MK,Bowman CC,Ladics GS,Privalle L,Laessig	2009
Consumption	Séralini G-E,de Vendômois JS,Cellier D,Sultan C,Buiatti	2009
Consumption	Sissener NH,Martin SAM,Cash P,Hevrøy EM,Sanden M,	2009
Consumption	Stein HH,Rice DW,Smith BL,Hinds MA,Sauber TE,Pede	2009
Consumption	Thomas K,MacIntosh S,Bannon G,Herouet-Guicheney C	2009
Consumption	Xu W,Cao S,He X,Luo Y,Guo X,Yuan Y,Huang K	2009
Consumption	Ahuja V,Quatchadze M,Ahuja V,Stelter D,Albrecht A,Sta	2010
Consumption	Battistelli S,Citterio B,Baldelli B,Parlani C,Malatesta M	2010
Consumption	Belanche A,Erroa IR,Balcells J,Calleja L	2010
Consumption	Bolt HM,Hengstler JG	2010
Consumption	Cao S,He X,Xu W,Ran W,Liang L,Luo Y,Yuan Y,Zhang I	2010
Consumption	Daleprane JB,Chagas MA,Vellarde GC,Ramos CF,Boav	2010
Consumption	de Vendômois JS,Cellier D,Vélot C,Clair E,Mesnage R,S	2010
Consumption	Efsa	2010
Consumption	Guimaraes V,Drumare M-F,Lereclus D,Gohar M,Lamour	2010
Consumption	Higgins SE,Ellestad LE,Trakooljul N,McCarthy F,Saliba ,	2010
Consumption	Huber M,van de Vijver LPL,Parmentier H,Savelkoul H,C	2010
Consumption	Kim DK,Lillehoj HS,Lee SH,Jang SI,Bravo D	2010
Consumption	Krzyżowska M,Wincenciak M,Winnicka A,Baranowski A,	2010
Consumption	Ladics GS,Knippels LMJ,Penninks AH,Bannon GA,Gooc	2010
Consumption	Lin C-H,Sheu F,Lin H-T,Pan T-M	2010
Consumption	Mejia L,Jacobs CM,Utterback PL,Parsons CM,Rice D,Sa	2010
Consumption	Nakajima O,Koyano S,Akiyama H,Sawada J-i,Teshima F	2010
Consumption	Paul V,Guertler P,Wiedemann S,Meyer HHD	2010
Consumption	Rapp D	2010
Consumption	Rouquié D,Capt A,Eby WH,Sekar V,Hérouet-Guicheney	2010
Consumption	Sissener NH,Johannessen LE,Hevrøy EM,Wiik-Nielsen	2010
Consumption	Steinke K,Guertler P,Paul V,Wiedemann S,Ettle T,Albrec	2010
Consumption	Taylor SL,Baumert JL	2010
Consumption	Tudisco R,Mastellone V,Cutrignelli MI,Lombardi P,Bover	2010
Consumption	Wilcks A,Jacobsen B	2010
Consumption	Wu J,An Y,Yao J,Wang Y,Tang H	2010
Consumption	Yonemochi C,Suga K,Harada C,Hanazumi M	2010

Consumption	Adel-Patient K,Guimaraes VD,Paris A,Drumare M-F,Ah-I	2011
Consumption	Altenbach SB,Allen PV	2011
Consumption	Brouk MJ,Cvetkovic B,Rice DW,Smith BL,Hinds MA,Ow	2011
Consumption	Cao S,Xu W,Luo Y,He X,Yuan Y,Ran W,Liang L,Huang	2011
Consumption	Delgado JE,Wolt JD	2011
Consumption	Domingo JL,Giné Bordonaba J	2011
Consumption	Fermín G,Keith RC,Suzuki JY,Ferreira SA,Gaskill DA,Pit	2011
Consumption	Goodman RE,Tetteh AO	2011
Consumption	Gruber H,Paul V,Guertler P,Spiekers H,Tichopad A,Mey	2011
Consumption	Hammond BG,Jez JM	2011
Consumption	Herman EM,Burks AW	2011
Consumption	Herman RA,Dunville CM,Juberg DR,Fletcher DW,Cromv	2011
Consumption	Herman RA,Dunville CM,Juberg DR,Fletcher DW,Cromv	2011
Consumption	Herman RA,Ladics GS	2011
Consumption	Krishnan HB,Jang S,Kim W-S,Kerley MS,Oliver MJ,Trick	2011
Consumption	Ladics GS,Cressman RF,Herouet-Guicheney C,Herman	2011
Consumption	McNaughton J,Roberts M,Rice D,Smith B,Hinds M,Delar	2011
Consumption	McNaughton J,Roberts M,Rice D,Smith B,Hinds M,Delar	2011
Consumption	Randhawa GJ,Singh M,Grover M	2011
Consumption	Rennen MAJ,Koster S,Krul CAM,Houben GF	2011
Consumption	Sharma P,Singh AK,Singh BP,Gaur SN,Arora N	2011
Consumption	Sissener NH,Hemre G-I,Lall SP,Sagstad A,Petersen K,V	2011
Consumption	Tripathi MK,Mondal D,Somvanshi R,Karim SA	2011
Consumption	Verma AK,Misra A,Subash S,Das M,Dwivedi PD	2011
Consumption	Walsh MC,Buzoianu SG,Gardiner GE,Rea MC,Gelencsé	2011
Consumption	Xu W,Li L,Lu J,Luo Y,Shang Y,Huang K	2011
Consumption	Yuan Y,Xu W,Luo Y,Liu H,Lu J,Su C,Huang K	2011
Consumption	Zhang W,Shi F	2011
Consumption	Zhou XH,Dong Y,Xiao X,Wang Y,Xu Y,Xu B,Shi WD,Zha	2011
Consumption	Zhu L,Gu M,Meng X,Cheung SCK,Yu H,Huang J,Sun Y,	2011
Consumption	Buzoianu SG,Walsh MC,Rea MC,Cassidy JP,Ross RP,(	2012
Consumption	Buzoianu SG,Walsh MC,Rea MC,Cassidy JP,Ryan TP,F	2012
Consumption	Buzoianu SG,Walsh MC,Rea MC,O'Donovan O,Gelencs	2012
Consumption	Buzoianu SG,Walsh MC,Rea MC,O'Sullivan O,Cotter PD	2012
Consumption	Buzoianu SG,Walsh MC,Rea MC,O'Sullivan O,Crispie F	2012
Consumption	Cao S,He X,Xu W,Luo Y,Yuan Y,Liu P,Cao B,Shi H,Hua	2012
Consumption	Chukwudebe A,Privalle L,Reed A,Wandelt C,Contri D,Da	2012
Consumption	Chung YJ,Ronsmans S,Crevel RWR,Houben GF,Rona I	2012
Consumption	Fonseca C,Planchon S,Renaut J,Oliveira MM,Batista R	2012
Consumption	Gendel SM	2012
Consumption	Harper B,McClain S,Ganko EW	2012
Consumption	Liu P,He X,Chen D,Luo Y,Cao S,Song H,Liu T,Huang K,	2012
Consumption	Madduri KM,Schafer BW,Hasler JM,Lin G,Foster ML,Em	2012
Consumption	Mishra A,Gaur SN,Singh BP,Arora N	2012
Consumption	Misra A,Kumar S,Verma AK,Chanana N,Das M,Dhawan	2012
Consumption	Nordgård L,Brusetti L,Raddadi N,Traavik T,Averhoff B,N	2012
Consumption	Podevin N,du Jardin P	2012
Consumption	Qi X,He X,Luo Y,Li S,Zou S,Cao S,Tang M,Delaney B,Xu	2012
Consumption	Rizzi A,Raddadi N,Sorlini C,Nordgrd L,Nielsen KM,Daffo	2012
Consumption	Séralini G-E,Clair E,Mesnage R,Gress S,Defarge N,Mala	2012
Consumption	Snell C,Bernheim A,Bergé J-B,Kuntz M,Pascal G,Paris A	2012
Consumption	Stagg NJ,Thomas J,Herman RA,Juberg DR	2012
Consumption	Stevenson SE,Woods CA,Hong B,Kong X,Thelen JJ,Lac	2012
Consumption	Tang M,Xie T,Cheng W,Qian L,Yang S,Yang D,Cui W,Li	2012
Consumption	Udenigwe CC,Aluko RE	2012
Consumption	Venâncio VP,Silva JPL,Almeida AA,Brigagão MRPL,Aze	2012
Consumption	Walsh MC,Buzoianu SG,Gardiner GE,Rea MC,Ross RP	2012
Consumption	Walsh MC,Buzoianu SG,Rea MC,O'Donovan O,Gelencs	2012
Consumption	Weber N,Halpin C,Hannah LC,Jez JM,Kough J,Parrott V	2012

Consumption	Young GJ,Zhang S,Mirsky HP,Cressman RF,Cong B,La	2012
Consumption	Zhang L,Hou D,Chen X,Li D,Zhu L,Zhang Y,Li J,Bian Z,L	2012
Consumption	Zhang Y,Wiggins BE,Lawrence C,Petrick J,Ivashuta S,H	2012
Consumption	Zhou XH,Dong Y,Wang Y,Xiao X,Xu Y,Xu B,Li X,Wei XS	2012
Consumption	Zhu Y,He X,Luo Y,Zou S,Zhou X,Huang K,Xu W	2012
Consumption	Zurzolo GA,Mathai ML,Koplin JJ,Allen KJ	2012
Consumption	Petrick JS,Brower-Toland B,Jackson AL,Kier LD	2013
Traceability	Aarts HJM,Rie J-PPFv,Kok EJ	2002
Traceability	Anklam E,Neumann DA	2002
Traceability	Bertheau Y,Diolez A,Kobilinsky A,Magin K	2002
Traceability	Brodmann PD,Ilg EC,Berthoud H,Herrmann A	2002
Traceability	Brookes G	2002
Traceability	Kok EJ,Aarts HJM,Van Hoef AMA,Kuiper HA	2002
Traceability	Orlandi PA,Lampel KA,South PK,Assar SK,Carter L,Levy	2002
Traceability	Permingeat HR,Reggiardo MI,Vallejos RH	2002
Traceability	Stave JW	2002
Traceability	Terry CF,Harris N,Parkes HC	2002
Traceability	Trapmann S,Schimmel H,Kramer GN,Van den Eede G,F	2002
Traceability	Van den Eede G,Kay S,Anklam E,Schimmel H	2002
Traceability	van Duijn GJ,van Biert R,Bleeker-Marcelis H,Van Boeijel	2002
Traceability	Wiseman G	2002
Traceability	Bauer T,Weller P,Hammes WP,Hertel C	2003
Traceability	Hernández M,Rodríguez-Lázaro D,Esteve T,Prat S,Pla M	2003
Traceability	Holst-Jensen A,Rønning SB,Løvseth A,Berdal KG	2003
Traceability	Homola J	2003
Traceability	James D,Schmidt A-m,Wall E,Green M,Masri S	2003
Traceability	Kharazmi M,Bauer T,Hammes WP,Hertel C	2003
Traceability	Mannelli I,Minunni M,Tombelli S,Mascini M	2003
Traceability	Poms RE,Hochsteiner W,Luger K,Glössl J,Foissy H	2003
Traceability	Rudi K,Rud I,Holck A	2003
Traceability	Su W,Song S,Long M,Liu G	2003
Traceability	Bauer T,Hammes WP,Haase NU,Hertel C	2004
Traceability	Bordoni R,Mezzelani A,Consolandi C,Frosini A,Rizzi E,C	2004
Traceability	European C	2004
Traceability	Gachon C,Mingam A,Charrier B	2004
Traceability	Germini A,Zanetti A,Salati C,Rossi S,Forré C,Schmid S,I	2004
Traceability	Giovannoli C,Anfossi L,Tozzi C,Giraudi G,Vanni A	2004
Traceability	Glynou K,Ioannou PC,Christopoulos TK	2004
Traceability	Hernández M,Duplan M-N,Berthier G,Vaïtilingom M,Hau	2004
Traceability	Holst-Jensen A,Berdal KG	2004
Traceability	Hou Y,Tlili C,Jaffrezic-Renault N,Zhang A,Martelet C,Poi	2004
Traceability	Liu J,Xing D,Shen X,Zhu D	2004
Traceability	Miraglia M,Berdal KG,Brera C,Corbisier P,Holst-Jensen	2004
Traceability	Obeid PJ,Christopoulos TK,Ioannou PC	2004
Traceability	Quirasco M,Schoel B,Plasencia J,Fagan J,Galvez A	2004
Traceability	Rho JK,Lee T,Jung S-I,Kim T-S,Park Y-H,Kim Y-M	2004
Traceability	Taverniers I,Van Bockstaele E,De Loose M	2004
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Traceability	Vanni A,Anfossi L,Giovannoli C,Oddenino L,Giraudi G	2004
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Traceability	Huang C-C,Pan T-M	2005

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Traceability	Onishi M,Matsuoka T,Kodama T,Kashiwaba K,Futo S,Ak	2005
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Traceability	Raspor P	2005
Traceability	Taverniers I,Windels P,Vaitilingom M,Milcamps A,Van B	2005
Traceability	Xu W,Huang K,Zhao H,Luo Y	2005
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Traceability	Yang L,Pan A,Zhang K,Guo J,Yin C,Chen J,Huang C,Zh	2005
Traceability	Yang L,Pan A,Zhang K,Yin C,Qian B,Chen J,Huang C,Zl	2005
Traceability	Yoshimura T,Kuribara H,Matsuoka T,Kodama T,Iida M,V	2005
Traceability	Agodi A,Barchitta M,Grillo A,Sciacca S	2006
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Traceability	Grothaus GD,Bandla M,Currier T,Giroux R,Jenkins GR,L	2006
Traceability	Hird H,Chisholm J,Sanchez A,Hernandez M,Goodier R,S	2006
Traceability	Holst-Jensen A,De Loose M,Van den Eede G	2006
Traceability	Kalogianni DP,Koraki T,Christopoulos TK,Ioannou PC	2006
Traceability	La Paz J-L,García-Muniz N,Nadal A,Esteve T,Puigdomè	2006
Traceability	Lee S-H,Min D-M,Kim J-K	2006
Traceability	Leimanis S,Hernández M,Fernández S,Boyer F,Burns M	2006
Traceability	Nadal A,Coll A,La Paz JL,Esteve T,Pla M	2006
Traceability	Passamano M,Pighini M	2006
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Traceability	Perron A,Raymond P,Simard R	2006
Traceability	Roda A,Mirasoli M,Guardigli M,Michelini E,Simoni P,Maç	2006
Traceability	Rønning SB,Berdal KG,Andersen CB,Holst-Jensen A	2006
Traceability	Toyota A,Akiyama H,Sugimura M,Watanabe T,Kikuchi H	2006
Traceability	Toyota A,Akiyama H,Sugimura M,Watanabe T,Sakata K	2006
Traceability	Xu J,Miao H,Wu H,Huang W,Tang R,Qiu M,Wen J,Zhu S	2006
Traceability	Yang L,Pan A,Zhang H,Guo J,Yin C,Zhang D	2006
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Traceability	Akiyama H,Sasaki N,Sakata K,Ohmori K,Toyota A,Kikuc	2007
Traceability	Alexander TW,Reuter T,McAllister TA	2007
Traceability	Bernardo GD,Gaudio SD,Galderisi U,Cascino A,Cipollar	2007
Traceability	Chaouachi M,Giancola S,Romaniuk M,Laval V,Bertheau	2007
Traceability	Charels D,Broeders S,Corbisier P,Trapmann S,Schimme	2007
Traceability	Chaumpluk P,Kerman K,Takamura Y,Tamiya E	2007
Traceability	Dalla Costa L,Martinelli L	2007
Traceability	Davison J,Bertheau Y	2007
Traceability	Fantozzi A,Ermolli M,Marini M,Scotti D,Balla B,Querci M,	2007
Traceability	García-Ruiz C,García MC,Cifuentes A,Marina ML	2007
Traceability	Hemels S,Leimanis S,Mazzara M,Bellocchi G,Foti N,Moe	2007
Traceability	La Paz JL,Esteve T,Pla M	2007
Traceability	Macarthur R,Murray AWA,Allnutt TR,Deppe C,Hird HJ,K	2007
Traceability	Ocaña MF,Fraser PD,Patel RKP,Halket JM,Bramley PM	2007
Traceability	Pan L,Zhang S,Yang L,Broll H,Tian F,Zhang D	2007
Traceability	Petit L,Pagny G,Baraige F,Nignol A-C,Zhang D,Fach P	2007
Traceability	Rossi S,Lesignoli F,Germini A,Faccini A,Sforza S,Corrac	2007

Traceability	Sánchez L,González R,Crego AL,Cifuentes A	2007
Traceability	Singh CK,Ojha A,Bhatanagar RK,Kachru DN	2007
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Traceability	Tani H,Kanagawa T,Morita N,Kurata S,Nakamura K,Tsu	2007
Traceability	Vodret B,Milia M,Orani MG,Serratrice G,Mancuso MR	2007
Traceability	Weighardt F	2007
Traceability	Weiss J,Ros-Chumillas M,Peña L,Egea-Cortines M	2007
Traceability	Wu Y,Wu G,Xiao L,Lu C	2007
Traceability	Xu J,Zhu S,Miao H,Huang W,Qiu M,Huang Y,Fu X,Li Y	2007
Traceability	Yamakawa H,Akiyama H,Endo Y,Miyatake K,Sakata K,S	2007
Traceability	Yang R,Xu W,Luo Y,Guo F,Lu Y,Huang K	2007
Traceability	Zel J,Gruden K,Cankar K,Stebih D,Blejec A	2007
Traceability	Zhang D,Corlet A,Fouilloux S	2007
Traceability	Allnutt TR,Dwyer M,McMillan J,Henry C,Langrell S	2008
Traceability	Baranski R,Baranska M	2008
Traceability	Broothaerts W,Corbisier P,Schimmel H,Trapmann S,Vin	2008
Traceability	Buh Gašparič M,Cankar K,Žel J,Gruden K	2008
Traceability	Caires ARL,Teixeira MRO,Súarez YR,Andrade LHC,Lim	2008
Traceability	Cankar K,Chauvensy-Ancel V,Fortabat M-N,Gruden K,K	2008
Traceability	Dong W,Yang L,Shen K,Kim B,Kleter GA,Marvin HJP,Gu	2008
Traceability	Elenis DS,Kalogianni DP,Glynou K,Ioannou PC,Christop	2008
Traceability	García-Cañas V,Cifuentes A	2008
Traceability	Guo L,Qiu B,Chi Y,Chen G	2008
Traceability	Harikai N,Saito S,Abe M,Kondo K,Kitta K,Akiyama H,Tes	2008
Traceability	Leimanis S,Hamels S,Nazé F,Mbongolo Mbella G,Sneye	2008
Traceability	Marmiroli N,Maestri E,Gulli M,Malcevschi A,Peano C,Bo	2008
Traceability	Michelini E,Simoni P,Cevenini L,Mezzanotte L,Roda A	2008
Traceability	Morisset D,Dobnik D,Hamels S,Žel J,Gruden K	2008
Traceability	Oguchi T,Onishi M,Chikagawa Y,Minegishi Y,Kodama T,	2008
Traceability	Prins TW,van Dijk JP,Beenen HG,Van Hoef AMA,Voorhu	2008
Traceability	Quirasco M,Schoel B,Chhalliyil P,Fagan J,Gálvez A	2008
Traceability	Schmidt A-m,Sahota R,Pope DS,Lawrence TS,Belton M	2008
Traceability	Shrestha HK,Hwu K-K,Wang S-J,Liu L-F,Chang M-C	2008
Traceability	Tichoniuk M,Ligaj M,Filipiak M	2008
Traceability	Wu G,Wu Y,Xiao L,Lu C	2008
Traceability	Yang L,Guo J,Zhang H,Liu J,Zhang D	2008
Traceability	Yang L,Liang W,Jiang L,Li W,Cao W,Wilson ZA,Zhang D	2008
Traceability	Yang L,Zhang H,Guo J,Pan L,Zhang D	2008
Traceability	Zhang H,Yang L,Guo J,Li X,Jiang L,Zhang D	2008
Traceability	Zhou P-P,Zhang J-Z,You Y-H,Wu Y-N	2008
Traceability	Zhu D,Tang Y,Xing D,Chen WR	2008
Traceability	Ahmed MU,Saito M,Hossain MM,Rao SR,Furui S,Hino A	2009
Traceability	Akiyama H,Nakamura F,Yamada C,Nakamura K,Nakajir	2009
Traceability	Arne H-J	2009
Traceability	Arvanitoyannis IS,Vlachos A	2009
Traceability	Battistini E,Noli E	2009
Traceability	Bellocchi G,Bertholet V,Hamels S,Moens W,Remacle J,I	2009
Traceability	Bulcke M,Lievens A,Barbau-Piednoir E,MbongoloMbella	2009
Traceability	Corbisier P,Bhat S,Partis L,Rui Dan Xie V,Emslie KR	2009
Traceability	Demeke T,Jenkins GR	2009
Traceability	Demeke T,Ratnayaka I,Phan A	2009
Traceability	Dobnik D,Morisset D,Gruden K	2009
Traceability	Dörries H-H,Remus I,Grönewald A,Grönewald C,Bergho	2009
Traceability	Gaudio S,Cirillo A,Bernardo G,Galderisi U,Cipollaro M	2009
Traceability	Götz F	2009
Traceability	Guertler P,Paul V,Albrecht C,Meyer HHD	2009
Traceability	Guo J,Yang L,Liu X,Guan X,Jiang L,Zhang D	2009
Traceability	Guo J,Yang L,Liu X,Zhang H,Qian B,Zhang D	2009
Traceability	Guo L,Yang H,Qiu B,Xiao X,Xue L,Kim D,Chen G	2009

Traceability	Hamels S,Glouden T,Gillard K,Mazzara M,Debode F,Fot	2009
Traceability	Harikai N,Saito S,Abe M,Kondo K,Kitta K,Akiyama H,Tes	2009
Traceability	Jiang L,Yang L,Zhang H,Guo J,Mazzara M,Van den Eed	2009
Traceability	Kodama T,Kuribara H,Minegishi Y,Futo S,Watai M,Sawa	2009
Traceability	Lee D,La Mura M,Allnutt TR,Powell W	2009
Traceability	Li X,Yang L,Zhang J,Wang S,Shen K,Pan L,Zhang D	2009
Traceability	Li Y,Xing D,Zhang C	2009
Traceability	Lin C-H,Lu C-T,Lin H-T,Pan T-M	2009
Traceability	Liu M,Luo Y,Tao R,He R,Jiang K,Wang B,Wang L	2009
Traceability	Mano J,Oguchi T,Akiyama H,Teshima R,Hino A,Furui S,	2009
Traceability	Milcamps A,Rabe S,Cade R,De Framond AJ,Henrikssor	2009
Traceability	Nadal A,Esteve T,Pla M	2009
Traceability	Novak PK,Gruden K,Morisset D,Lavrac N,Stebih D,Rotte	2009
Traceability	Ocaña MF,Fraser PD,Patel RKP,Halket JM,Bramley PM	2009
Traceability	Oguchi T,Onishi M,Chikagawa Y,Kodama T,Suzuki E,Ka	2009
Traceability	Oguchi T,Onishi M,Minegishi Y,Kurosawa Y,Kasahara M	2009
Traceability	Randhawa GJ,Chhabra R,Singh M	2009
Traceability	Raymond P,Gendron L,Khalf M,Paul S,Dibley KL,Bhat S	2009
Traceability	Ruttink T,Demeyer R,Gulck E,Droogenbroeck B,Querci I	2009
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Traceability	Scholtens IMJ,Kok EJ,Hougs L,Molenaar B,Thissen JTN	2009
Traceability	Sun Y,Kwok Y-C,Foo-Peng Lee P,Nguyen N-T	2009
Traceability	Trapmann S,Corbisier P,Schimmel H,Emons H	2009
Traceability	Waiblinger H-U,Grohmann L,Mankertz J,Engelbert D,Pie	2009
Traceability	Alderborn A,Sundström J,Soeria-Atmadja D,Sandberg M	2010
Traceability	Alishahi A,Farahmand H,Prieto N,Cozzolino D	2010
Traceability	Bahrdt C,Krech AB,Wurz A,Wulff D	2010
Traceability	Bai S,Zhang J,Li S,Chen H,Terzaghi W,Zhang X,Chi X,T	2010
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Traceability	Buh Gašparič M,Tengs T,Paz JL,Holst-Jensen A,Pla M,E	2010
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Traceability	Dinon AZ,Bosco KT,Arisi ACM	2010
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Traceability	Jiang L,Yang L,Rao J,Guo J,Wang S,Liu J,Lee S,Zhang	2010
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Traceability	Kodama T,Kurosawa Y,Kitta K,Naito S	2010
Traceability	Lien TTN,Lam TD,An VTH,Hoang TV,Quang DT,Khieu D	2010
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Traceability	Liu D,Shen J,Yang L,Zhang D	2010
Traceability	Oguchi T,Onishi M,Mano J,Akiyama H,Teshima R,Futo S	2010
Traceability	Papazova N,Zhang D,Gruden K,Vojvoda J,Yang L,Gašp	2010
Traceability	Pirondini A,Bonas U,Maestri E,Visioli G,Marmiroli M,Mar	2010
Traceability	Querci M,Bulcke M,Žel J,Eede G,Broll H	2010
Traceability	Rousserie G,Sukhanova A,Even-Desrumeaux K,Fleury F	2010
Traceability	Székács A,Lauber É,Takács E,Darvas B	2010
Traceability	Takabatake R,Onishi M,Koiwa T,Futo S,Minegishi Y,Akiy	2010
Traceability	Wang C,Jiang L,Rao J,Liu Y,Yang L,Zhang D	2010
Traceability	Akiyama H,Makiyama D,Nakamura K,Sasaki N,Minegish	2011
Traceability	Akiyama H,Sakata K,Kondo K,Tanaka A,Liu MS,Oguchi	2011
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Traceability	Baeumler S,Wulff D,Tagliani L,Song P	2011
Traceability	Bauer T,Kirschbaum K,Panter S,Kenk M,Bergemann J	2011
Traceability	Bordoni R,Germini A,Mezzelani A,Marchelli R,De Bellis G	2011
Traceability	Broothaerts W,Corbisier P,Emons H,Emteborg H,Linsing	2011
Traceability	Burrell A,Foy C,Burns M	2011
Traceability	Cattunar A,Capak K,Novak JZ,Mićović V,Doko-Jelinić J,I	2011
Traceability	Chaouachi M,Chupeau GI,Berard AI,McKhann H,Roman	2011
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Traceability	Charels D,Broeders S,Corbisier P,Trapmann S,Schimme	2011

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Traceability	Ghedira R,Papazova N,Vuylsteke M,Ruttink T,Tavernier	2011
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Title	Journal	Volume
Validation studies and proficiency testing	Journal of AOAC International	85
Potential for the environmental impact of transgenic crop	Nature Biotechnology	20
Experience with environmental issues in GM crop produ	Toxicology Letters	127
Experience with environmental issues in GM crop produ	Toxicology Letters	127
Industry scientists look for benefits, not risks	Nature	419
Plant biotechnology in China	Science	295
Safety assessment of genetically modified crops	Toxicology	181-182
Hazard identification and risk assessment procedure for	Environmental Science and Pollution	9
Clinical risk assessment of GM foods	Toxicology Letters	127
Genetically modified foods: a taste of the future	Medsurg nursing: official journal of the	11
Consumer attitudes towards genetically modified foods	Appetite	39
IMPROVING RISK ASSESSMENT FOR NONTARGET S	Ecological Applications	12
Five years of Bt cotton in China - the benefits continue	Plant J	31
Genetically modified foods, science, consumers and the	The Proceedings of the Nutrition Soci	61
Regulatory control of genetically modified (GM) foods: lik	Toxicology Letters	127
ECONOMIC, ECOLOGICAL, FOOD SAFETY, AND SOC	Annual Review of Entomology	47
Consumer perception of risk associated with eating gene	Journal of the American Dietetic Asso	103
The release of genetically modified crops into the enviro	Plant Journal	33
Communicating about the risks and benefits of genetical	Risk analysis: an official publication of	23
Genetically Modified Corn— Environmental Benefits and	PLoS Biology	1
A Framework for Assessing the Risk of Transgenic Crop	BioScience	53
The release of genetically modified crops into the enviro	Plant Journal	33
Yield effects of genetically modified crops in developing	Science	299
Risk assessment of GM plants: avoiding gridlock?	Trends in Plant Science	8
Science-Based Risk Assessment for Nontarget Effects c	BioScience	54
Societal aspects of genetically modified foods	Food and Chemical Toxicology	42
GM foods and the misperception of risk perception	Risk analysis: an official publication of	24
Comment on: An assessment of the risks associated wit	Journal of Antimicrobial Chemotherap	54
Is confidence in the monitoring of GE foods justified?	Trends in Biotechnology	22
Nutritional and Safety Assessments of Foods and Feeds	CRFSFS	3
Regulating Transgenic Crops: A Comparative Analysis o	Transgenic Research	13
Assessment of the safety of foods derived from genetica	Food and Chemical Toxicology	42
Concluding remarks	Food and Chemical Toxicology	42
ECOLOGICAL EFFECTS OF TRANSGENIC CROPS AN	Annual Review of Ecology, Evolution,	35
Biological and biomedical aspects of genetically modifie	Biomedicine & Pharmacotherapy	59
Rethinking the Risk Management Process for Geneticall	Ecology and Society	10
Human safety and genetically modified plants: a review o	Journal of Applied Microbiology	99
Transgenes for tea?	Trends in Biotechnology	23
Genetically Modified Foods: Breeding Uncertainty	Environmental Health Perspectives	113
Will transgenic plants adversely affect the environment?	Journal of Biosciences	30
Are Genetically Modified Plants Useful and Safe?	IUBMB Life	57
9th International Symposium on the Biosafety of Genetic	Environmental Biosafety Research	5
Assessing environmental risks of transgenic plants	Ecology letters	9
9th International Symposium on the Biosafety of Genetic	Environmental Biosafety Research	5
Letting the gene out of the bottle: the population genetics	The New Phytologist	170
Guidance document of the scientific panel on genetically modified organisms for the risk assessment of ge		
Guidance on the environmental risk assessment fo gene	EFSA Journal	8
Agricultural biodiversity, nutrition, and health: making a c	Food and Nutrition Bulletin	27
Need for an "Integrated Safety Assessment" of GMOs, L	J. Agric. Food Chem.	54
Conservation Biology, Genetically Modified Organisms, a	Conservation Biology	20
Awareness, acceptance of and willingness to buy geneti	Appetite	46
9th International Symposium on the Biosafety of Genetic	Environmental Biosafety Research	5
The Hazards of Genetically Engineered Foods	Environmental Health Perspectives	114
9th International Symposium on the Biosafety of Genetic	Environmental Biosafety Research	5
9th International Symposium on the Biosafety of Genetic	Environmental Biosafety Research	5
A framework for the design of general surveillance of ge	Journal für Verbraucherschutz und Le	1
9th International Symposium on the Biosafety of Genetic	Environmental Biosafety Research	5
Cisgenic plants are similar to traditionally bred plants	EMBO Reports	7

Cisgenic plants are similar to traditionally bred plants: Int	EMBO Reports	7
Genetically modified crops: success, safety assessment	Applied Microbiology and Biotechnolo	71
Global Impact of Biotech Crops: Socio-Economic and Environmental Effects in the First Ten Years of Comr		
History of safe use as applied to the safety assessment (	Food and Chemical Toxicology	45
Attitudes of agricultural scientists in Indonesia towards g	Asia Pacific Journal of Clinical Nutritic	16
Safety of Virus-Resistant Transgenic Plants Two Decade	Annual Review of Phytopathology	45
Opportunities for biotechnology and policy regarding my	International Journal of Food Microbic	119
Development of agribiotechnology and biosafety regulati	Journal of AOAC International	90
Genetically Modified Organisms in the United States: Im	Green Gene Technology	107
The precautionary principle should not be used as a bas	EMBO Reports	8
Biosafety and risk assessment framework for selectable	Transgenic Research	16
Ecological versus ecotoxicological methods for assessin	Plant Science	173
Problem formulation and hypothesis testing for environr	Environmental Biosafety Research	5
Safety assessment of genetically modified organisms of	Biotechnology Journal	2
Approaches in the risk assessment of genetically modifie	Food and Chemical Toxicology	45
Risk assessment of meat and milk from cloned animals	Nat Biotech	25
Current Definitions of Risk for Food Safety and Animal H	Risk Analysis	28
A risk-based classification scheme for genetically modifi	Regulatory Toxicology and Pharmaco	52
A risk-based classification scheme for genetically modifi	Regulatory Toxicology and Pharmaco	52
Genetically modified organisms: do the benefits outweigl	Medicina (Kaunas)	44
EU to monitor for Chinese GM rice	Nat Biotech	26
Genetically modified plants and human health	Journal of the Royal Society of Medici	101
Comparative safety assessment of plant-derived foods	Regulatory Toxicology and Pharmaco	50
Action needed to harmonize regulation of low-level pres	Nat Biotech	26
Current issues connected with usage of genetically modi	Polish Journal of Veterinary Sciences	11
Swedish farmers attitudes, expectations and fears in rel	Environmental Biosafety Research	7
Regulation of GMOs in China	International Journal of Bioethics	19
US regulatory system for genetically modified [geneticall	Plant Biotechnology Journal	6
Genetically modified food from crops: progress, pawns,	Analytical and Bioanalytical Chemistry	392
GM directive deficiencies in the European Union. The cu	EMBO Reports	9
Planning Environmental Risk Assessment for Geneticall	Plant Physiology	147
Trace and traceability—a call for regulatory harmony	Nature Biotechnology	26
Ecological Impacts of Genetically Modified Crops: Ten Y	Green Gene Technology	107
Farm questionnaires for monitoring genetically modified	Environmental Biosafety Research	7
Constantly evolving safety assessment protocols for GM	Asia Pacific Journal of Clinical Nutritic	17 Suppl 1
Regulating innovative crop technologies in Canada: the	Plant Biotechnology Journal	6
Crop improvement using small RNAs: applications and p	Trends in Biotechnology	27
Food Safety	Clinical Reviews in Allergy & Immunol	39
Commentary: Genetic modification through oligonucleoti	Environ. Biosafety Res.	8
Towards a smart biosafety regulation: The case of Keny	Environmental Biosafety Research	8
Perceptions, knowledge and ethical concerns with GM fc	Public Understanding of Science (Bris	18
Preface to the journal supplement dedicated to the early	Food and Chemical Toxicology	47
Safety assessment of food products from r-DNA animals	Comparative Immunology, Microbiolo	32
Genetically Engineered Plants and Foods: A Scientist's A	Annual Review of Plant Biology	60
Farmer knowledge and a priori risk analysis: pre-release	Environmental Science and Pollution	16
A 21st century technique for food control: electronic nos	Analytica Chimica Acta	638
Commentary: Statistical aspects of environmental risk as	Environmental Biosafety Research	8
GMO assessment in Norway: societal utility and sustain	EMBO Reports	10
GM Risk Assessment	Transgenic Wheat, Barley and Oats	478
Biosafety, Risk Assessment and Regulation of Plant-Ma	Recombinant Proteins From Plants	483
Strangled at birth? Forest biotech and the Convention or	Nat Biotech	27
Fitness and beyond: Preparing for the arrival of GM crop	Environmental Biosafety Research	8
Advancing environmental risk assessment for transgenic	Biotechnology for Biofuels	2
Ecological risk assessment of genetically modified crops	Biotechnology Advances	27
Key elements in a strategic approach to capacity buildin	Environmental Biosafety Research	9
Genetic engineering compared to natural genetic variatic	New Biotechnology	27
A Framework for Postrelease Environmental Monitoring	Crop Science	50
Experience from use of GMOs in Argentinian agriculture	New Biotechnology	27
Food safety risks and consumer health	New Biotechnology	27

GM plants: Science, politics and EC regulations	Plant Science	178
Genetically modified crops deserve greater ecotoxicolog	Ecotoxicology	19
Trade and commerce in improved crops and food: an es	New Biotechnology	27
GMO analysis – a complex and challenging undertaking	Analytical and Bioanalytical Chemistry	396
A decade of EU-funded GMO research (2001-2010)		
A decade of EU-funded GMO research		
Needs for and environmental risks from transgenic crop:	New Biotechnology	27
Safe composition levels of transgenic crops assessed vi	Biotechnology Journal	5
Food safety performance indicators to benchmark food s	International Journal of Food Microbic	1, Supplem
Popular misconceptions: agricultural biotechnology	New Biotechnology	27
The regulation of agricultural biotechnology: science sho	New Biotechnology	27
Grain Yield Increase and Pollen Containment by Plus-Hy	Crop Science	50
Using existing data to predict and quantify the risks of GI	Environmental Biosafety Research	9
Application of food and feed safety assessment principle	Food and Chemical Toxicology	48
Regulation must be revolutionized	Nature	466
Environmental risk assessments for transgenic crops pr	Transgenic Research	19
Information system for monitoring environmental impact:	Environmental Science and Pollution	17
Ecological risk assessment for transgenic crops: separat	Trends in Biotechnology	28
Genetically Modified Salmon and Full Impact Assessmer	Science	330
The 20-year environmental safety record of GM trees	Nat Biotech	28
Problem formulation in the environmental risk assessme	Transgenic Research	19
The CINMa Index: Assessing the potential impact of GM	Environmental Biosafety Research	9
Nutritionally enhanced crops and food security: scientific	Current Opinion in Biotechnology	22
Regulatory considerations surrounding the deployment c	GM crops	2
Global Status of Commercialized Biotech/GM Crops	ISAAA Brief	43
Biotechnology: US Congress right to halt GM salmon	Nature	476
A semi-quantitative approach to GMO risk-benefit analys	Transgenic Research	20
Plants with genetically modified events combined by con	Food and Chemical Toxicology	49
Derivation and Interpretation of Hazard Quotients To As:	J. Agric. Food Chem.	59
Recommendations for the design of laboratory studies o	Transgenic Research	20
Environmental change challenges decision-making durir	Transgenic Research	
GM grass eludes outmoded USDA oversight	Nature Biotechnology	29
Global impact of biotech crops: environmental effects, 1	GM crops & food	3
Biotechnology: Bring more rigour to GM research	Nature	491
Genetically modified crops and aquatic ecosystems: con	Transgenic Research	21
Field trials and tribulations—making sense of the regulat	Plant Biotechnology Journal	10
Biotech crops' seal of safety does not convince skeptics	Journal of the National Cancer Institut	104
The emerging international regulatory framework for biot	GM crops & food	3
Introduction to the GM crops special issue on biosafety,	GM crops & food	3
GM in the media	GM crops & food	3
Africa's inevitable walk to genetically modified (GM) crop	New Biotechnology	
To be or not to be transgenic	Nature Biotechnology	30
Development of an agricultural biotechnology crop prod	Journal of agricultural and food chemi	60
Commercializing genetically modified crops under EU re	GM crops & food	3
Influence of scientific-technical literacy on consumers' be	Appetite	
Orgenic plants: Gene-manipulated plants compatible wit	Biotechnology Journal	7
State of the art in benefit-risk analysis: consumer percep	Food and chemical toxicology: an inte	50
The structuring of GMO release and evaluation in EU lav	Biotechnology Journal	7
Is Genetic Engineering Ever Going to Take Off in Forage	Annals of Botany	
Paradoxical EU agricultural policies on genetically engin	Trends in Plant Science	in press
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Glyphosate-Resistant Goosegrass. Identification of a Mu	Plant Physiology	129
Effect of rice lines transformed with Bacillus thuringiensi	Entomologia Experimentalis et Applic	102
Impacts of developing on Bt maize-intoxicated hosts on l	Journal of Entomological Science	37
Impacts of developing on Bt maize-intoxicated hosts on l	J. Entomol. Sci.	37
Effects of Transgenic Herbicide-Resistant Soybean Vari	Environmental Entomology	31
Ostrinia nubilalis parasitism and the field abundance of r	Environmental Biosafety Research	1
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Avidin expressed in transgenic tobacco leaves confers r	Transgenic Res.	11

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Plant toxic proteins with insecticidal properties. A review	Toxicon	40
Omnivory in terrestrial arthropods: mixing plant and prey	Annu Rev Entomol	47
The effect of transgenic nematode resistance on non-tar	J. Appl. Ecol.	39
Honey Bees: Estimating the Environmental Impact of Chemicals		
Evaluation of dietary effects of transgenic corn pollen ex	Entomologia Experimentalis et Applic	104
Uptake of Bt-toxin by herbivores feeding on transgenic n	Ecological Entomology	27
Case study: Bt crops-a novel mode of insect control	Genetically Modified Crops: Assessin	22
Laboratory studies on the effects of pollen from Bt-maize	J. Appl. Entomol.	126
The case of the monarch butterfly: a verdict is returned	Trends in genetics: TIG	18
The effect of the cowpea trypsin inhibitor in strawberry o	J. Hortic. Sci. Biotechnol.	77
Insect-resistant transgenic plants in a multi-trophic conte	Plant J	31
No detection of Cry1Ac protein in soil after multiple years	Environmental Entomology	31
Effects of T4-lysozyme release from transgenic potato rc	Appl. Environ. Microbiol.	69
Effects of T4 lysozyme release from transgenic potato rc	Applied and Environmental Microbiolc	68
Assessment of the non-target effects of transgenic Bt co	J. Kans. Entomol. Soc.	75
Larvicidal toxins from Bacillus thuringiensis subspp. kurs	Can. J. Microbiol.	48
Larvicidal toxins from Bacillus thuringiensis subspp. kurs	Canadian Journal of Microbiology	48
Effects of above-ground plant species composition and c	Antonie Van Leeuwenhoek	81
Effects of Bt transgenic rice on population dynamics of n	Acta Phytophylacica Sin.	29
Coleopteran-specific Cry3Bb Toxin from Transgenic Cor	Environmental Entomology	31
Effects of ingestion of a biotin-binding protein on adult ar	Apidologie	33
Using proteins to assess the potential impacts of genetically modified plants on honey bees		
First investigations into the effects of Bt corn crop on Ne	Bolletino de Zoologia Agraria e di Bac	34
Taxonomic and functional diversity of pseudomonas isol	FEMS Microbiol Ecology	42
Effect of Bt-toxin (Cry1Ac) in Transgenic Cotton on the A	Environmental Entomology	31
Bt toxin is released in root exudates from 12 transgenic c	Soil Biol. Biochem.	34
Bt toxin is not taken up from soil or hydroponic culture by	Plant and Soil	239
Bacterial community composition in the rhizosphere of a	FEMS Microbiol Ecology	40
Effects of snowdrop lectin (Galanthus nivalis agglutinin)	Ann. Entomol. Soc. Am.	95
Parasitism and location of sugarcane borer (Lepidoptera	Environ. Entomol.	31
Genetically Engineered Organisms: Assessing Environmental and Human Health Effects		
Release, persistence, and biological activity in soil of ins	Genetically Engineered Organisms: Assessing En	
Effect of transgenic Bt cotton on population of cotton pes	Chin. J. Biol. Control	18
Does large-scale cropping of herbicide-resistant cultivar	Outlook on Agriculture	31
The expression in tobacco plants of Aedes aegypti trypsi	Mol. Breed.	9
Consumption of two Bt and six non-Bt corn varieties by t	Basic and Applied Ecology	3
Seasonal abundance of the mirids, Lygus lucorum and A	Crop Protection	21
Effect of Bt Corn Expressing the Cry3Bb1 Toxin for Corn	Environmental Entomology	32
Effect of Bt Corn for Corn Rootworm Control on Nontarg	Environmental Entomology	32
Effect of Bt-cotton expressing Cry1A(c) on the survival a	Biological Control	26
Impact of genetically modified potato expressing plant-d	Biocontrol Sci. Technol.	13
Oryzacystatin I expressed in transgenic potato induces c	Mol. Ecol.	12
Molecular interactions between an insect predator and it	Mol. Ecol.	12
Environmental risk assessment of transgene products u	Apidologie	34
Invertebrate responses to the management of geneticall	Philosophical Transactions of the Roy	358
Preliminary observations on effects of Bt-corn on non-target soil Collembola		
Effects of genetically modified plants on microbial comm	Biology and fertility of soil	37
Effects of genetically modified plants on microbial comm	Biol. Fertil. Soils	37
Insect Resistance to Bacillus Thuringiensis Alterations in	Molecular & Cellular Proteomics	2
Long-term regional suppression of pink bollworm by Bac	Proceedings of the National Academy	100
Crop management and agronomic context of the Farm S	Philosophical Transactions of the Roy	358
UK field-scale evaluations answer wrong questions	Nature Biotechnology	21
The release of genetically modified crops into the enviro	Plant J.	33
A sequential approach to risk assessment of transgenic	Transgenic Res.	12
A novel approach to the use of genetically modified herb	Proceedings of the Royal Society of L	270
Extractable soil lipids and microbial activity as affected b	J. Environ. Sci. Health	B38
Extractable soil lipids and microbial activity as affected b	Journal of Environmental Science anc	38
Tritrophic interactions between transgenic potato expres	Transgenic Res.	12

Seasonal Changes in the Rhizosphere Microbial Commu	Appl Environ Microbiol	69
Assessing the risks of insect resistant transgenic plants (	BioControl	48
Effects of Bt on non-target organisms		
Evaluation of Bacillus thuringiensis bioinsecticidal protei	Plant and Soil	256
Impact of oilseed rape expressing the insecticidal cysteir	Mol. Ecol.	12
An introduction to the Farm-Scale Evaluations of genetic	Journal of Applied Ecology	40
Possible effects of (trans)gene flow from crops on the ge	Environmental Biosafety Research	2
Sustainability of insect resistance management strategie	Biotechnology Advances	22
Effects of dietary transgenic Bt corn pollen on larvae of A	Journal of Apiculture Research	42
Invertebrate responses to the management of geneticall	Philosophical Transactions of the Roy	358
Responses of plants and invertebrate trophic groups to (	Philosophical Transactions of the Roy	358
Weeds in fields with contrasting conventional and geneti	Philosophical Transactions of the Roy	358
Weeds in fields with contrasting conventional and geneti	Philosophical Transactions of the Roy	358
Detection and decay of the Bt endotoxin in soil from a fie	European Journal of Soil Science	54
Evaluation of Bt oilseed rape on the non-target herbivore	Entomologia Experimentalis et Applic	106
Preview: Global Status of Transgenic Crops: 2003		
Select Nontarget Arthropod Abundance in Transgenic ar	Environmental Entomology	32
Occurrence of Danaus plexippus L. (Lepidoptera: Danai	Agric. Environ.	97
Dual Resistance to Bacillus thuringiensis Cry1Ac and Cr	Applied and Environmental Microbiolc	69
Assessing responses of soil microorganisms to GM plan	Trends in Ecology and Evolution	18
Activity of free and clay-bound insecticidal proteins from	Applied and Environmental Microbiolc	69
Transgenic Bt-producing Brassica napus: Plutella xyloste	Environmental Biosafety Research	2
Influence of herbicide tolerant soybean production syste	Journal of Economic Entomology	96
Characterization and comparison of midgut proteases of	Journal of Invertebrate Pathology	82
Effects of Novel Pesticides on Bumble Bee (Hymenopte	Environmental Entomology	32
Bt sweet corn and selective insecticides: impacts on pes	Journal of Economic Entomology	96
Spring aphid-parasitoid (Hom., Aphididae, Hym., Bracon	Journal of Pest Science	76
Consumption of snowdrop lectin (Galanthus nivalis aggl	Oecologia	134
Invertebrates and vegetation of field margins adjacent to	Philosophical Transactions of the Roy	358
Inheritance of resistance to Bt canola in a field-derived p	Pest Management Science	59
Selection of relevant non-target herbivores for monitorin	Environ. Biosafety Res.	2
Tritrophic choice experiments with bt plants, the diamon	Transgenic Research	12
Impact of Transgenic Genotypes and Subdivision on Div	Crop Science	43
On the rationale and interpretation of the Farm Scale Ev	Philos. Trans. R. Soc. London B	358
On the rationale and interpretation of the Farm Scale Ev	Philosophical Transactions of the Roy	358
Fate and Effects in Soil of the Insecticidial Toxins from B	Collection of Biosafety Reviews	1
Impacts of transgenic sugarcane expressing GNA lectin	Environ. Entomol.	32
Ecological studies on epigeous arthropod populations of	Agric. Ecosyst. Environ.	95
Influences of Bacillus thuringiensis Berliner Cotton Plant	Environmental Entomology	32
Degradation of the Cry1Ab protein within transgenic Bac	Molecular Ecology	12
Effects of transgenic Bt corn litter on the earthworm Lum	Molecular Ecology	12
Effects of Cry1Ab-Expressing Corn Anthers on Monarch	Environmental Entomology	33
Transgenic crops expressing Bt proteins: Current status,	Transgenic Crop Protection: Concepts and Strate	
Soil Microbial Communities Associated with Bt and Non-	J. Environ. Qual.	33
Bacterial communities associated with the rhizosphere o	Plant Soil.	266
A faunistic approach to assess potential side-effects of g	Biocontrol Science and Technology	14
Absence of non-target effects of two Bacillus thuringiens	Journal of Applied Entomology	128
Biotechnology meets ecology	Genomics for Biosafety in Plant Biotechnology	
Effect of Cry3Bb Transgenic Corn and Tefluthrin on the S	J. Environ. Qual.	33
Effects on Monarch Butterfly Larvae (Lepidoptera: Danai	Environmental Entomology	33
Effects of Transgenic Bacillus thuringiensis Potato and C	Environmental Entomology	33
Impact of genetically modified crops on soil- and plant-a	J Environ Qual	33
Amelioration of biodiversity impacts of genetically modifi	Proceedings of the Royal Society. Sei	271
The environmental consequences of adopting conservat	Agriculture, Ecosystems & Environme	103
Field and semifield evaluation of impacts of transgenic c	Journal of Economic Entomology	97
A Bacillus thuringiensis crystal protein with selective cyto	Journal of Biological Chemistry	279
Influence of Bt transgenes on cell wall lignification and di	Crop Science	44
Inheritance of Resistance to Bacillus thuringiensis Cry1A	Journal of Economic Entomology	97
Binding analyses of Cry1Ab and Cry1Ac with membrane	Biochemical and Biophysical Researc	323

Transgenic Bt maize and Rhopalosiphum padi (Hom., Ap	Ecological Entomology	29
Nutritional suitability of corn pollen for the predator Colec	Journal of Insect Physiology	50
Development of hypopharyngeal glands in adult honey b	Apidologie	35
First investigations on the effects of Bt-transgenic Brassi	IOBC Wprs Bulletin	27
Transgenic Bt-producing Brassica napus: Plutella xylost	Environmental Biosafety Research	2
Influence of pesticide applications on pest and predatory	Phytoparasitica	32
Impact of genetically modified crops and their managem	Journal of Environmental Quality	33
Microbial communities of Solanum tuberosum and maga	Plant Soil.	266
EFFECTS OF PLANTS GENETICALLY MODIFIED FOR	Annual Review of Entomology	50
Bacillus thuringiensis toxin (Cry1Ab) has no direct effect	Journal of Insect Physiology	50
Larvicidal Cry proteins from Bacillus thuringiensis are rel	Plant Physiology and Biochemistry	42
Genetic and Biochemical Characterization of Field-Evolv	Applied and Environmental Microbiolc	70
Effects of Bt plants on the development and survival of tl	Journal of Insect Physiology	50
Arthropod Abundance and Diversity in Bt and Non-Bt Co	Environmental Entomology	33
Persistence and biological activity in soil of the insecticid	Plant Soil.	266
Bt transgenic crops do not have favorable effects on res	Journal of Insect Science	4
Spider web survey or whole plant visual sampling? Impa	Environmental Biosafety Research	3
Development of a model system to assess the impact of	Plant Soil.	266
Bt-transgenic rice straw affects the culturable microbiota	Soil Biology and Biochemistry	36
Effect of straws from Bt-transgenic rice on selected biolc	European Journal of Soil Biology	40
Impact of glyphosate on the Bradyrhizobium japonicum s	J Environ Qual	33
Detectability of coleopteran-specific Cry3Bb1 protein in s	Environmental Entomology	34
Detectability of Coleopteran-specific Cry3Bb1 Protein in	Environmental Entomology	34
Effects of biotechnology on biodiversity: herbicide-tolera	Trends Biotechnol	23
Foliage-dwelling arthropods in Bt-transgenic and isogeni	Acta Phytopathologica et Entomologic	40
Influence of Bt-transgenic pollen, Bt-toxin and protease i	Apidologie	36
Effects of transgenic cry1Ab rice pollen on fitness of Pro	Journal of Pest Science	78
Field studies on the environmental fate of the Cry1Ab Bt	Molecular Ecology	14
Field studies on the environmental fate of the Cry1Ab Bt	Molecular Ecology	14
Field Evaluation of the Impact of Corn Rootworm (Coleo	Environmental Entomology	34
Field Evaluation of the Impact of Corn Rootworm (Coleo	Environmental Entomology	34
Biodiversity and Community Structure of Epedaphic and	Environmental Entomology	34
Effects on weed and invertebrate abundance and diversi	Proceedings of the Royal Society B: E	272
Influence of herbicide-resistant canola on the environme	Pest Management Science	61
Bacterial communities associated with the rhizosphere o	Plant and Soil	266
Impact of Bt Corn on Rhizospheric and Soil Eubacterial (	Appl Environ Microbiol	71
Environmental Fate and Effects of Bacillus thuringiensis	Journal of agricultural and food chemi	53
Effect of Bacillus thuringiensis Transgenic Corn for Lepic	Environmental Entomology	34
Impact of farm-scale Bt maize on abundance of predator	Crop Protection	24
Impact of Transgenic VIP3A Cry1Ab Lepidopteran-resist	Environmental Entomology	34
Tracking the source of Bacillus thuringiensis Cry1Ab enc	Biochemical Systematics and Ecology	33
Cry1Ab Protein Does Not Persist in Soil After 3 Years of	Environmental Entomology	34
Effects of Bt maize expressing Cry1Ab and Bt spray on S	Entomologia Experimentalis et Applica	114
Bacterial Diversity in Rhizospheres of Nontransgenic an	Appl Environ Microbiol	71
Transgenic Bt plants decompose less in soil than non-Bt	Soil Biology and Biochemistry	37
A Comparison of Soil Microbial Community Structure, Pr	Plant and Soil	275
A comparison of soil microbial community structure, prot	Plant and Soil	275
Predaceous Arthropods and Lepidopteran Pests on Con	Environmental Entomology	34
A Multiyear, Large-Scale Comparison of Arthropod Popu	Environmental Entomology	34
Predicting longer-term changes in weed populations und	Weed Research	45
Influence of Planting Papaya Ringspot Virus Resistant T	J. Agric. Food Chem.	54
Genetically modified potatoes expressing Cry 3A protein	Journal of Applied Entomology	129
Effects of biotechnology on biodiversity: herbicide-tolera	Trends in Biotechnology	23
Susceptibility of Dipel-Resistant and -Susceptible Ostrini	Journal of Economic Entomology	98
Impact of Pollen Grains from Bt Transgenic Corn on the	Environmental Entomology	34
The Impacts of the Pollen of Insect-resistant Transgenic	Biodiversity and Conservation	14
Effects of transgenic plants on soil microorganisms	Plant and Soil	271
Effects of the Cry1Ac toxin of Bacillus thuringiensis on M	Entomologia Experimentalis et Applica	114
Impact of transgenic cotton plants on a non-target pest,	Ecological Entomology	30

Effects of transgenic Cry1A+CpTI cotton and Cry1Ac tox	Insect Science	12
Effects of Bt transgenic cotton lines on the cotton bollwo	Biological Control	35
Utility of Ground Beetle Species in Field Tests of Potenti	Environmental Entomology	34
The impact of transgenic plants on natural enemies: a cr	Entomologia Experimentalis et Applic	114
Tritrophic Interactions Among Bt (Cry3Bb1) Corn, Aphid	Environmental Entomology	34
Response of Danaus plexippus to pollen of two new Bt c	Entomologia Experimentalis et Applic	116
An alternative strategy for sustainable pest resistance in	PNAS	102
Comparing methods to evaluate the effects of Bt maize a	Agriculture, Ecosystems & Environme	107
Effects of Bt maize-fed prey on the generalist predator P	Transgenic Research	14
The influence of pesticide applications on Helicoverpa a	Crop Protection	24
Persistence and impact on microorganisms of Bacillus th	Plant and Soil	266
Differences in yields, residue composition and N mineral	Nutrient Cycling in Agroecosystems	73
Long-Term Assessment of the Effects of Transgenic Bt (	Environmental Entomology	34
Long-Term Assessment of the Effects of Transgenic Bt (	Environmental Entomology	34
Effects of Bt maize on Frankliniella tenuicornis and expo	Entomologia Experimentalis et Applic	115
Effects of plants genetically modified for insect resistanc	Annu Rev Entomol	50
EFFECTS OF PLANTS GENETICALLY MODIFIED FOR	Annual Review of Entomology	50
Herbicide-resistant crops and weed resistance to herbici	Pest Management Science	61
Impact of Transgenic Bacillus thuringiensis Corn and Cr	Environmental Entomology	34
Molecular composition of leaves and stems of geneticall	Journal of Environmental Quality	34
Abundance of non-target pests in transgenic Bt-maize: a	European Journal of Entomology	102
Quantification of Bt-protein digestion and excretion by th	Biocontrol Science and Technology	15
Roundup Ready soybeans in Argentina: farm level and a	Agricultural Economics	32
Changes of Bt toxin in the rhizosphere of transgenic Bt c	World Journal of Microbiology and Bic	21
Laboratory studies of the effects of reduced prey choice	Bulletin of Entomological Research	95
Effects of transgenic Bt corn pollen on a non-target lycae	Applied Entomology and Zoology	40
Persistence and biological activity in soil of the insecticid	Plant and Soil	266
Persistence and biological activity in soil of the insecticid	Plant and Soil	266
Weed and arthropod populations in conventional and ge	Agriculture, Ecosystems & Environme	105
Delayed Resistance to Transgenic Cotton in Pink Bollwo	Proceedings of the National Academy	102
Canopy- and Ground-Dwelling Predatory Arthropods in (	Environmental Entomology	34
Susceptibility of Eldana saccharina (Lepidoptera: Pyralid	Biocontrol Science and Technology	15
Evaluating the induced-odour emission of a Bt maize an	Transgenic Research	14
Development of a model system to assess the impact of	Plant and Soil	266
Effects of Bt maize on the herbivore Spodoptera littoralis	Transgenic Research	14
A Comparison of Arthropod Communities in Transgenic	Environmental Entomology	34
Cyt1A of Bacillus thuringiensis Delays Evolution of Resis	Applied and Environmental Microbiolc	71
Single Amino Acid Mutations in the Cadherin Receptor fr	Journal of Biological Chemistry	280
Changes in soil microbial community structure associate	Journal of Environmental Sciences	17
Altered host plant preference of Tetranychus urticae and	Biological Control	33
Concurrent use of transgenic plants expressing a single	Proceedings of the National Academy	102
Influence of Cry1Ac Toxin on Mineralization and Bioavail	J Agric Food Chem	54
Changes in Populations of Heliothis virescens (F.) (Lepi	J Cotton Sci	10
Effect of corn hybrids expressing the coleopteran-specifi	Journal of Economic Entomology	99
Evaluation of Effects of Coleopteran-Specific Cry3Bb1 P	Environmental Entomology	35
Effects of Cry1Ab Toxin on Propylea japonica (Thunberg	Environmental Entomology	35
Preference tests with collembolas on isogenic and Bt-ma	European Journal of Soil Biology	42
Midgut bacteria required for Bacillus thuringiensis insecti	Proceedings of the National Academy	103
Farm-scale evaluation of the impacts of transgenic cotto	Proceedings of the National Academy	103
Field Assessment of the Effects of Transgenic Rice Expr	Environmental Entomology	35
Recent developments and future prospects in insect pes	Trends in Plant Science	11
Pink bollworm moth (Lepidoptera: Gelechiidae) catches	Insect Science	13
Subacute Effects of Cry1Ab Bt Corn Litter on the Earthw	Environmental Entomology	35
Subacute effects of transgenic Cry1Ab Bacillus thuringie	Environmental Toxicology and Chemi	25
Decomposition processes under Bt (Bacillus thuringiensi	Soil Biology and Biochemistry	38
Resistance Evolution to	Bt Crops: Predispersal Mating of Eurc	LoS Biolog
Assessing Nontarget Impacts of Bt Corn Resistant to Co	Environmental Entomology	35
Six Years after the Commercial Introduction of Bt Maize	Transgenic Research	15
Transgenic Plants for Insect Pest Control: A Forward Lo	Transgenic Research	15

Prey-mediated effects of transgenic canola on a benefici	Transgenic Research	15
Effects of genetically modified herbicide-tolerant croppin	Biology Letters	2
Effect of Pollen of Regular Cotton and Transgenic Bt+Cr	Environmental Entomology	35
Weed seed resources for birds in fields with contrasting	Proceedings of the Royal Society B: E	273
Soil microbial and faunal community responses to Bt ma	Journal of Environmental Quality	35
Physiologically based demographics of Bt cotton–pest in	Ecological Modelling	191
Is Resistance to Bacillus thuringiensis Endotoxin Cry1Ac	Journal of Economic Entomology	99
The detection and decay of Cry1Ab Bt-endotoxins within	Biocontrol Science and Technology	16
Consequences for Protaphorura armata (Collembola: Or	Environmental Pollution	142
Consequences for Protaphorura armata (Collembola: Or	Environmental Pollution	142
Effect of the pollen of transgenic rice line, TT9-3 with a fi	Appl Entomol Zool	41
Comparative susceptibility of European corn borer, soutl	Journal of Economic Entomology	99
Cry toxin mode of action in susceptible and resistant Hel	Journal of Invertebrate Pathology	92
An analytical model assessing the potential threat to nati	Biology Letters	2
The effects of pollen consumption of transgenic Bt maize	Basic and Applied Ecology	7
Life in earth: the impact of GM plants on soil ecology?	Trends in Biotechnology	24
Bt maize pollen exposure and impact on the garden spid	Entomologia Experimentalis et Applica	118
A 3-year field-scale monitoring of foliage-dwelling spider	Biological Control	38
Impact of transgenic Bacillus thuringiensis cotton on a n	Insect Science	13
Pyrolysis-field ionization mass spectrometry of rhizodepo	Environmental Biosafety Research	5
Impact of transgenic Bt maize residues on the mycotoxig	Journal of Environmental Quality	35
Exposure of arthropod predators to Cry1Ab toxin in Bt m	Ecological Entomology	31
Biological Activity of Cry1Ab Toxin Expressed by Bt Maiz	BioControl	51
Assessing the effects of Bt Maize on the predatory mite I	Experimental & applied acarology	38
Rhizosphere bacteria affected by transgenic potatoes wi	FEMS Microbiol Ecology	56
Effect of Transgenic Bt Rice on the Survival of Three No	Environmental Entomology	35
Lack of detrimental effects of Bacillus thuringiensis Cry t	Appl Environ Microbiol	72
Lack of detrimental effects of Bacillus thuringiensis Cry t	Applied and Environmental Microbiolc	72
Transgenic crops expressing Bacillus thuringiensis toxin	Nature Biotechnology	24
Monitoring the Cry1Ab susceptibility of European corn bo	Journal of Economic Entomology	99
Loss of Agro-Biodiversity, Uncertainty, and Perceived Co	Risk Analysis	26
Transgenic Bt cotton has no apparent effect on enzymat	Plant and Soil	285
Laboratory evaluation of effects of transgenic Bt corn po	Applied Entomology and Zoology	41
Analyses of Cry1Ab Binding in Resistant and Susceptibl	Applied and Environmental Microbiolc	72
Spatial and temporal dynamics of oviposition behavior of	Entomologia Experimentalis et Applica	120
Interactions of Bt-cotton and the omnivorous big-eyed bu	Biological Control	39
Can Bacillus thuringiensis (Bt) corn residues and Bt-corr	Applied Soil Ecology	32
Cry1Ab protein from Bt transgenic rice does not residue	Environmental Pollution	143
Impact of Bt corn on the diplopod Allajulus latestriatus	Pedobiologia	50
Early instar response to plant-delivered Bt-toxin in a hert	Crop Protection	25
Transmission of Bt Toxin to the Predator Propylaea japo	Environmental Entomology	35
Effects of Bt-toxin Cry1Ac on Propylaea japonica Thunbe	Journal of Applied Entomology	130
Development and reproduction of Propylaea japonica rai	Zoological Studies	45
Frequency of resistance to Bacillus thuringiensis toxin C	Journal of Economic Entomology	100
Composition of arthropod species assemblages in Bt-ex	Environmental Entomology	36
Managing Farming's Footprint on Biodiversity	Science	315
Farmland Biodiversity and the Footprint of Agriculture	Science	315
The effects of GMHT crops on bird abundance in arable	Agriculture, Ecosystems & Environme	118
Impacts of transgenic cry1Ab rice on non-target planthop	Biological Control	42
Impact of single-gene and dual-gene Bt broccoli on the I	Transgenic Research	17
Evaluation of effects of transgenic Bt maize on microartl	Pedobiologia	51
Hierarchical classification of environmental factors and a	Pedobiologia	51
Neither transgenic Bt maize (MON863) nor tefluthrin inse	Soil Biology and Biochemistry	39
Proteolytic processing of native Cry1Ab toxin by midgut e	Journal of Insect Physiology	53
Occurrence and persistence of Bacillus thuringiensis (Bt	Ecotoxicology and Environmental Saf	66
Assessing changes in soil microbial communities and ca	Applied Soil Ecology	37
High Susceptibility of Bt Maize to Aphids Enhances the F	PLoS ONE	2
Short-term assessment of bt maize on non-target arthro	Scientia Agricola	64
Bitrophic and tritrophic effects of Bt Cry3A transgenic po	Transgenic Research	16

Response of ground beetle (Coleoptera: Carabidae) field	Environmental Entomology	36
Effects of Bacillus thuringiensis Cry Toxins on Developm	Environmental Entomology	36
Varietal effects of eight paired lines of transgenic Bt mai	Plant Biotechnology Journal	5
Coccinellids, aphids, and pollen in diversified vegetable	Journal of insect science (Online)	7
Sugarcane borer (Lepidoptera: Crambidae) resistance to	Journal of Economic Entomology	100
F2 Screen for Resistance to a Bacillus Thuringiensis-Ma	Bulletin of Entomological Research	97
Studying the effect of exposure of the snail Helix aspers	Applied Soil Ecology	37
Responses by earthworms to reduced tillage in herbicide	Pedobiologia	51
Arthropod Abundance and Diversity in Bt and Non-Bt Ric	Environmental Entomology	36
Cross-Resistance Studies of Cry1Ac-Resistant Strains o	Journal of Economic Entomology	100
A Meta-Analysis of Effects of Bt Cotton and Maize on Nc	Science	316
Transgenic maize containing the Cry1Ab protein ephem	Ambio	36
Modelling the role of refuges for sustainable managemer	Crop Protection	26
Role of Receptors in Bacillus thuringiensis Crystal Toxin	Microbiology and Molecular Biology R	71
Impact assessment of Bt-maize on a moth parasitoid, Cc	Crop Protection	26
Effects of insecticide-treated and Lepidopteran-active Bt	Environmental Entomology	36
Effects of Bt corn pollen on honey bees: emphasis on pr	Apidologie	38
Toxins in transgenic crop byproducts may affect headwa	Proceedings of the National Academy	104
Release of the recombinant proteins, human serum albu	Plant Physiology and Biochemistry	45
Influence of transgenic cottons with Bacillus thuringiensi	BioControl	52
Effects of transgenic Bt cotton on insecticide use and ab	Entomologia Experimentalis et Applic	124
A global approach to resistance monitoring	Journal of Invertebrate Pathology	95
Engineering Modified Bt Toxins to Counter Insect Resist	Science	318
Soil persistence of Bacillus thuringiensis (Bt) toxin from t	Biology and Fertility of Soils	43
Abundance and diversity of ground-dwelling arthropods	Annals of Applied Biology	150
Effects of cultivation of genetically modified Bt maize on	Environmental Entomology	36
Biodegradation of Cry1Ab Protein from Bt Transgenic Ri	J. Agric. Food Chem.	55
Mechanism of Resistance to Bacillus thuringiensis Toxin	Applied and Environmental Microbiolc	73
Target and non-target effects on the invertebrate commu	Australian Journal of Agricultural Res	58
Field decomposition of transgenic Bt maize residue and	Plant and Soil	300
Prey mediated effects of Bt maize on fitness and digesti	Transgenic Research	17
Transgenic tobacco revealing altered bacterial diversity i	Antonie Van Leeuwenhoek	93
Impact of insecticidal proteins expressed in transgenic p	Entomologia Experimentalis et Applic	126
The burden of proof: A response to Rosi-Marshall et al	Proceedings of the National Academy	105
How to cope with insect resistance to Bt toxins?	Trends in Biotechnology	26
A Critical Assessment of the Effects of Bt Transgenic Pla	PLoS ONE	3
Environmental impact of herbicide regimes used with ge	Transgenic Research	17
A Meta-Analysis of Effects of Bt Crops on Honey Bees (I	PLoS ONE	3
Assessing the Risk to Nontarget Organisms from Bt Cor	Environmental Entomology	37
Molecular investigations of the soil, rhizosphere and tran	Zeitschrift Für Naturforschung. C, Jou	63
Diversity and seasonal phenology of aboveground arthro	Biological Control	44
Do transgenic plants affect rhizobacteria populations?	Microbial Biotechnology	1
Tri-trophic interactions between Bt cotton, the herbivore	Environmental Entomology	37
Effects of Bt-corn decomposition on the composition of t	Applied Soil Ecology	40
Microbial populations and enzyme activities in soil in situ	Journal of Environmental Quality	37
Fate and effects of insect-resistant Bt crops in soil ecosy	Soil Biology and Biochemistry	40
Effects of Bt transgenic Chinese cabbage on the herbivc	Journal of Economic Entomology	101
Comparison of herbicide regimes and the associated po	Pest Management Science	64
Bacillus thuringiensis (Bt) transgenic crop: an environme	Journal of Environmental Biology / Ac	29
Assessing the utilization of a carbohydrate food source a	Biological Control	44
Effect of Transgenic Maize Mon 810 on Selected Non-Ta	Vegetable Crops Research Bulletin	69
Consumption of Bt Maize Pollen Expressing Cry1Ab or C	PLoS ONE	3
Increased survival of western corn rootworm on transge	Proceedings of the National Academy	105
Larval feeding on Bt hybrid and non-Bt corn seedlings by	Environmental Entomology	37
A two-year field study with transgenic Bacillus thuringien	Science of The Total Environment	405
Effects of Transgenic Hybrid Aspen Overexpressing Poly	Applied and Environmental Microbiolc	74
Weed species shifts in glyphosate-resistant crops	Pest Management Science	64
Field trials to evaluate effects of Bt-transgenic silage cor	Transgenic Research	18
Aquatic fate and effects of Bacillus thuringiensis Cry3Bb	Environmental toxicology and chemist	27

Fate of Bacillus thuringiensis (Bt) Cry3Bb1 protein in a sc	Chemosphere	73
Bt-maize effects on biological parameters of the non-tarç	Pesticide Biochemistry and Physiolog	91
An evaluation of methods for assessing the impacts of B	Agricultural and Forest Entomology	10
Assessment of risk of insect-resistant transgenic crops t	Nat Biotechnol	26
Cross-resistance between a Bacillus thuringiensis Cry to	Pest Management Science	64
Effects of Bacillus thuringiensisδ-endotoxin-fed Helicove	Entomologia Experimentalis et Applic	126
The presence of Bacillus thuringiensis (Bt) protein in ear	Chemosphere	
Cumulative impact of GM herbicide-tolerant cropping on	Environmental Science and Pollution	16
Landscape Effects of Insect-Resistant Genetically Modifi	Integration of Insect-Resistant Genetically Modifie	
Interactions of Bacillus thuringiensis Cry1Ac toxin in gen	Transgenic Research	17
Effects of plant genotype and growth stage on the structı	FEMS Microbiology Ecology	64
Diversity and comparative phenology of Lepidoptera on I	International Journal of Pest Manager	54
Bt crop effects on functional guilds of non-target arthrop	PLoS One	3
Suppression of Cotton Bollworm in Multiple Crops in Chi	Science	321
Use of 13C labeling to assess carbon partitioning in tran	FEMS Microbiology Ecology	67
Reproductive biology of two nontarget insect species, Aç	Environmental Entomology	37
Responsiveness of Arthropod Herbivores and Their Natı	Environmental Entomology	38
Bt maize fed-prey mediated effect on fitness and digestiv	Journal of Insect Physiology	55
Bacillus thuringiensis Cry1Ac Resistance Frequency in T	Journal of Economic Entomology	102
Susceptibility of Helicoverpa armigera (Lepidoptera: Noc	Journal of Economic Entomology	102
Landscape effects of transgenic cotton on non-target an	Basic and Applied Ecology	10
Cadherin gene expression and effects of Bt resistance o	Journal of Insect Physiology	55
Horseweed with Reduced Susceptibility to Glyphosate F	J. Agric. Food Chem.	57
On-plant survival and inheritance of resistance to Cry1Al	Pest Management Science	65
Effects of Bacillus thuringiensis δ-endotoxins Cry1Ab an	Biocontrol Science and Technology	19
Frequency of Alleles Conferring Resistance to the Bacillı	Journal of Economic Entomology	102
Glyphosate-Resistant Crops and Weeds: Now and in the Future		
Novel Pink Bollworm Resistance to the Bt Toxin Cry 1Ac	Journal of Insect Science	9
Extracellular release of a heterologous phytase from roo	FEMS Microbiology Ecology	70
Survey of Tillage Trends Following The Adoption of Glyp	Weed Technology	23
Adaptation and Invasiveness of Western Corn Rootworn	Annual Review of Entomology	54
Impact of MON863 transgenic roots is equivalent on wes	Journal of Economic Entomology	102
Three-year field monitoring of Cry1F, event DAS-01507-	Environmental Entomology	38
Are survival and reproduction of Enchytraeus albidus (Ai	European Journal of Soil Biology	45
Protease activities in the midgut of Western corn rootwo	Journal of Invertebrate Pathology	100
Native Resistance to Western Corn Rootworm (Coleopte	Journal of Economic Entomology	102
Impact of cry1AC-carrying Brassica rapa subsp. pekinen	The Journal of Microbiology	47
Transgenic plants as vital components of integrated pest	Trends in Biotechnology	27
Effects of Bt-maize material on the life cycle of the land s	Applied Soil Ecology	42
U.S. Grower Views on Problematic Weeds and Changes	Weed Technology	23
Impact of coleopteran targeting toxin (Cry3Bb1) of Bt cor	Applied Soil Ecology	41
Indian Bt Cotton Varieties Do Not Affect the Performanc	PLoS ONE	4
Plant fitness assessment for wild relatives of insect resis	Environmental Biosafety Research	8
Assessing effects of transgenic Cry1Ac cotton on the ea	Soil Biology and Biochemistry	41
Evidence of field-evolved resistance to Cry1Ac-expressi	Pest Management Science	66
Activity of Bacillus thuringiensis hybrid protein against a	FEMS Microbiology Letters	302
Transgenic insecticidal crops and natural enemies: a det	Environmental Entomology	38
Limited survival of a Cry2Ab-resistant strain of Helicover	Journal of Economic Entomology	102
Characterization of the mechanism of action of the gene	Biochimica et Biophysica Acta (BBA) -	1788
Impacts of Bt crops on non-target invertebrates and inse	CAB	4
Enhancement of Bacillus thuringiensis Cry3Aa and Cry3	Applied and Environmental Microbiolc	75
Bacillus thuringiensis Resistance Influences European C	Journal of Economic Entomology	102
Resistance of Helicoverpa armigera to Cry1Ac toxin fron	Biochemical Journal	419
Impact of Bt-corn MON88017 in comparison to three cor	Transgenic Research	18
Assessment of biological and biochemical indicators in s	Environmental Monitoring and Assess	156
Effects of activated Bt transgene products (Cry1Ab, Cry3	Archives of environmental contaminat	56
Setting the record straight: a rebuttal to an erroneous an	Transgenic Research	18
Signaling versus punching hole: How do Bacillus thuring	Cellular and Molecular Life Sciences	66
Impact of an 8-Year-Old Transgenic Poplar Plantation or	Applied and Environmental Microbiolc	75

Asymmetrical cross-resistance between Bacillus thuringi	Proceedings of the National Academy	106
Field-evolved insect resistance to Bt crops: definition, th	Journal of Economic Entomology	102
Efficacy of Cry1Ac:Cry1F Proteins in Cotton Leaf Tissue	Journal of Economic Entomology	102
Bt Cotton in China: Are Secondary Insect Infestations Of	Agricultural Sciences in China	8
Rhizosphere Communities of Genetically Modified Zeax	Applied and Environmental Microbiolc	75
Response of multiple generations of beet armyworm, Sp	Journal of Applied Entomology	133
Inheritance of resistance to Bacillus thuringiensis Cry1Al	Journal of Invertebrate Pathology	102
Susceptibility of Cry1Ab-resistant and -susceptible sugar	Journal of Invertebrate Pathology	100
Using an F2 screen to monitor frequency of resistance a	Pest Management Science	65
Distinct non-target site mechanisms endow resistance tc	Planta	230
Vip3Aa Tolerance Response of Helicoverpa armigera P	Journal of Economic Entomology	103
Planting Patterns of In-Field Refuges Observed for Bt M	Journal of Economic Entomology	103
Rove beetle (Coleoptera: Staphylinidae) communities in	Crop Protection	29
Emergence of minor pests becoming major pests in GE	GM crops	1
Novel Vip3A Bacillus thuringiensis (Bt) maize approache	GM crops	1
Peer-reviewed surveys indicate positive impact of comm	Nature Biotechnology	28
Responses of stream macroinvertebrates to Bt maize le	Ecological Applications: A Publication	20
Attraction of the parasitoid Cotesia marginiventris to hos	Ecotoxicology (London, England)	19
Intraguild Competition and Enhanced Survival of Wester	Journal of Economic Entomology	103
Incipient Resistance of Helicoverpa punctigera to the Cr	PLoS ONE	5
Characteristics of Resistance to Bacillus thuringiensis T	Journal of Economic Entomology	103
Extrapolating non-target risk of Bt crops from laboratory	Biology Letters	6
Effect of Bt-176 maize pollen on first instar larvae of the	Environmental Biosafety Research	9
Gene amplification confers glyphosate resistance in Am	Proceedings of the National Academy	107
Regulation of the seasonal population patterns of Helico	Transgenic Research	19
Dispersal and Movement Behavior of Neonate Europear	Journal of Economic Entomology	103
Characterization of resistance to Bacillus thuringiensis tc	Journal of Invertebrate Pathology	104
Relevance of Traditional Integrated Pest Management (I	J. Agric. Food Chem.	59
Mortality of Western Corn Rootworm Larvae on MIR604	Journal of Economic Entomology	103
Density-dependent and density-independent mortality of	Journal of Economic Entomology	103
Areawide Suppression of European Corn Borer with Bt M	Science	330
Assessing the effects of cultivating genetically modified g	Environmental Biosafety Research	9
Exposure and nontarget effects of transgenic Bt corn del	Environmental Entomology	39
A Case Study for Assessment of Microbial Community D	Current Microbiology	61
Temporal Dynamics of Bacterial and Fungal Communitie	Microbial Ecology	61
Effects of transgenic Bt cotton on the population density,	Environmental Entomology	39
Use of maize pollen by adult Chrysoperla carnea (Neuro	Journal of Insect Physiology	56
Bt maize expressing Cry3Bb1 does not harm the spider I	Biological Control	53
PCR-denaturing gradient gel electrophoresis analysis to	Applied and Environmental Microbiolc	76
Effect on soil chemistry of genetically modified (GM) vs.	GM crops	1
Do genetically modified plants impact arbuscular mycorr	Ecotoxicology	19
Bacterial and fungal communities in the rhizosphere of fi	Environmental Biosafety Research	9
Mirid Bug Outbreaks in Multiple Crops Correlated with W	Science	328
Developing risk hypotheses and selecting species for as	Environmental Biosafety Research	9
Relative abundance and damage by target and non-targ	Crop Protection	29
Evaluating western corn rootworm (Coleoptera: Chryson	Journal of Economic Entomology	103
Impact of Genetically Engineered Crops on Farm Sustainability in the United States		
Modeling Evolution of Diabrotica Virgifera Virgifera (Cole	Journal of Economic Entomology	103
Managing resistance to Bt crops in a genetically variable	Ecological Applications: A Publication	20
A mathematical model of exposure of non-target Lepidop	Proceedings of the Royal Society B: Biological Sci	
Gene amplification delivers glyphosate-resistant weed e	Proceedings of the National Academy	107
Occurrence and field densities of Coleoptera in the maiz	Transgenic Research	19
Diabrotica-resistant Bt-maize DKc5143 event MON8801	Environmental Biosafety Research	9
Does the use of transgenic plants diminish or promote bi	New Biotechnology	27
Non-target organism effects tests on Vip3A and their ap	Transgenic Research	20
Isolation of transcripts from Diabrotica virgifera virgifera	Insect Molecular Biology	19
Field-Evolved Resistance to Bt Cotton: Bollworm in the U	Southwestern Entomologist	35
Occurrence of maize detritus and a transgenic insecticid	Proceedings of the National Academy	107
Laboratory and field assessments of prey-mediated effe	Environmental Entomology	39

Genetic diversity trends in twentieth century crop cultivar	Theoretical and Applied Genetics	120
Earthworm populations in a northern U.S. Cornbelt soil a	Soil Biology and Biochemistry	42
Diverse cadherin mutations conferring resistance to Bac	Insect Biochemistry and Molecular Bic	40
Laboratory toxicity studies demonstrate no adverse effec	Transgenic Research	20
Scant evidence supports EPA's pyramided Bt corn refug	Nature Biotechnology	29
Effects of transgenic Bt rice on growth, reproduction, an	Journal of Economic Entomology	104
Parallel Evolution of Bacillus Thuringiensis Toxin Resista	Genetics	189
No Impact of Transgenic nptII-leafy Pinus radiata (Pinale	Environmental Entomology	40
Bt-toxin uptake by the non-target herbivore, Myzus persi	Bulletin of Entomological Research	101
Cross-Pollination of Nontransgenic Corn Ears with Trans	Journal of Economic Entomology	104
Impact of GM crops on biodiversity	GM crops	2
A meta-analysis of crop pest and natural enemy respons	Ecology letters	14
The influence of fertilizer level and spore density on arbu	FEMS Microbiology Ecology	75
Effect of Pyramiding Bt and CpTI Genes on Resistance (	Journal of Economic Entomology	104
Transgenic plants expressing the quorum quenching lac	Research in microbiology	162
Field-evolved resistance to Bt toxin Cry1Ac in the pink b	Pest Management Science	67
Insertion of an intact CR1 retrotransposon in a cadherin	Insect Molecular Biology	20
Effect of MIR604 transgenic maize at different stages of	Journal of Economic Entomology	104
Field-Evolved Resistance to Bt Maize by Western Corn F	PLoS ONE	6
Insect-resistant biotech crops and their impacts on bene	Philosophical Transactions of the Roy	366
Belowground resistance to western corn rootworm in lep	Journal of Economic Entomology	104
Temporal allocation of metabolic tolerance to transgenic	Science China. Life sciences	54
Testing pollen of single and stacked insect-resistant Bt-n	PLoS ONE	6
Mortality Impact of Bt Transgenic Maize Roots Expressir	Journal of Economic Entomology	104
Assessing the risk posed to free-living soil nematodes by	Science of The Total Environment	409
F2 screening for resistance to pyramided Bacillus thurin	Pest Management Science	67
Reduced Levels of Membrane-Bound Alkaline Phosphat	PLoS ONE	6
Inheritance of resistance to Bacillus thuringiensis Cry1A	Pest Management Science	67
Resistance to Bt Maize in Busseola fusca (Lepidoptera:	Environmental Entomology	40
Effects of field-grown genetically modified Zoysia grass (	Journal of Microbiology and Biotechn	21
Does plant diversity benefit agroecosystems? A syntheti	Ecological Applications: A Publication	21
A comprehensive assessment of the effects of Bt cotton	PLoS ONE	6
Effect of Bt broccoli and resistant genotype of Plutella xy	Transgenic Research	20
Evaluating the Non-Rice Host Plant Species of Sesamia	Environmental Entomology	40
Adsorption of Transgenic Insecticidal Cry1Ab Protein to	Environ. Sci. Technol.	45
Bt rice evaluation and deployment strategies	GM crops	2
Selection for Resistance to mCry3A-Expressing Transge	Journal of Economic Entomology	104
Impact of Cry3Bb1-expressing Bt maize on adults of the	Pest Management Science, Pest Man	67, 67
Bt maize and integrated pest management - a European	Pest Management Science, Pest Man	67, 67
The impact of transgenic wheat expressing GNA (snowd	Environmental Entomology	40
Effect of Bt genetic engineering on indirect defense in cc	Transgenic Research	20
Improving Cry8Ka toxin activity towards the cotton boll w	BMC Biotechnology	11
A multi-scale, landscape approach to predicting insect p	Ecological Applications: A Publication	21
Selection for Cry3Bb1 Resistance in a Genetically Divers	Journal of Economic Entomology	104
Effects of transgenic Bt cotton on overwintering characte	Journal of Insect Physiology	57
Western Corn Rootworm (Coleoptera: Chrysomelidae) D	Environmental Entomology	40
Modification of Hormonal Balance in Larvae of the Corn	Journal of Economic Entomology	104
Tobacco plants expressing the Cry1AbMod toxin suppre	Insect Biochemistry and Molecular Bic	41
Feeding Behavior of Neonate Ostrinia nubilalis (Lepidop	Journal of Economic Entomology	104
Bacillus thuringiensis: a century of research, developme	Plant Biotechnology Journal	9
The presence of Bacillus thuringiensis (Bt) protein in ear	Chemosphere	85
Field Performance of a Genetically Engineered Strain of	PLoS ONE	6
Biodiversity, evolution and adaptation of cultivated crops	Comptes Rendus Biologies	334
Aphid-parasitoid community structure on genetically mo	Biology Letters	7
Fitness Cost of Resistance to Bt Cotton Linked with Incr	PLoS ONE	6
Bt Crop Effects on Functional Guilds of Non-Target Arthr	PLoS ONE	3
Field evaluation of effects of transgenic cry1Ab/cry1Ac, (	Science China. Life sciences	54
Decomposition Rates and Residue-Colonizing Microbial	Applied and Environmental Microbiolc	77
Risk assessment and ecological effects of transgenic Ba	Journal of integrative plant biology	53

Decrease in catalase activity of Folsomia candida fed a B	Environmental Pollution	159
Expression of Bt-Cry3A in transgenic Populus alba × P. (	Transgenic Research	20
Early Warning of Cotton Bollworm Resistance Associate	PLoS ONE	6
Postcommercialization monitoring of the long-term impa	Environmental Entomology	41
Cry Toxins in Transgenic Plants Have Direct Effects on I	Environmental Entomology	41
Field response of aboveground non-target arthropod cor	Transgenic Research	
Effect of Cry1Ab protein on rhizobacterial communities o	PLoS ONE	7
Heliothis virescens and Bt cotton in the United States	GM crops & food	3
Large-scale, spatially-explicit test of the refuge strategy f	Proceedings of the National Academy	109
Impact of salinity-tolerant MCM6 transgenic tobacco on s	Research in microbiology	163
Bt rice expressing Cry1Ab does not stimulate an outbrea	Transgenic Research	21
Temporal dynamics of microbial communities in the rhiz	Antonie Van Leeuwenhoek	
Ultra-structure and histochemistry of digestive cells of P	Micron (Oxford, England: 1993)	43
Field assessment of Bt cry1Ah corn pollen on the surviv	Ecotoxicology and Environmental Saf	79
Risk assessment of Cry toxins of Bacillus thuringiensis o	Experimental & applied acarology	
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Bt-maize event MON 88017 expressing Cry3Bb1 does n	Transgenic Research	
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Harmonia axyridis (Coleoptera: Coccinellidae) Exhibits N	PLoS ONE	7
Susceptibility to the Cry1F Toxin of Field Populations of S	Journal of Economic Entomology	105
Within-plant distribution of cotton aphids, Aphis gossypii	Bulletin of Entomological Research	102
Assessment of prey-mediated effects of the coleopteran	Bulletin of Entomological Research	102
Determination of insecticidal Cry1Ab protein in soil collec	Transgenic Research	21
Survival and development of a stored-product pest, Sitoj	Pest Management Science	
Extended monitoring of resistance to Bacillus thuringiens	GM crops & food	3
Field trials to evaluate effects of continuously planted tra	Journal of environmental monitoring: .	14
Widespread adoption of Bt cotton and insecticide decrea	Nature	487
Impact of transgenic cotton varieties on activity of enzym	Indian journal of biochemistry & bioph	49
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Estimating the effects of Cry1F Bt-maize pollen on non-t	The Journal of applied ecology	49
Deriving criteria to select arthropod species for laborator	Chemosphere	
EPSPS gene amplification in glyphosate-resistant Italian	Pest Management Science	68
Environmental risk assessment for the small tortoiseshe	Molecular Ecology	21
Effects of transgenic Bt cotton on soil fertility and biology	Environmental Monitoring and Assessment	
Pollen-Mediated Dispersal of Glyphosate-Resistance in I	Weed Science	60
Transgenic Cry1Ab Rice Does Not Impact Ecological Fit	PLoS ONE	7
Using field-evolved resistance to Cry1F maize in a lepid	Transgenic Research	
Testing Potential Effects of Maize Expressing the Bacillu	Applied and Environmental Microbiolc	78
Increased Frequency of Pink Bollworm Resistance to Bt	PLoS ONE	7
When bad science makes good headlines: Bt maize and	Nature Biotechnology	31
Scenarios for co-existence of genetically modified, conventional and organic crops in European agriculture		
Sensitive dependencies and separation distances for ge	Proceedings of the Royal Society B: E	269
Pollen-Mediated Movement of Herbicide Resistance Bet	Science	296
Measuring Gene Flow in the Cultivation of Transgenic B	Crop Science	42
Corn pollen dispersal: quasi-mechanistic models and fie	Ecological Monographs	73
Spatially explicit modelling of transgenic maize pollen dis	Journal of theoretical biology	225
Contamination of refuges by Bacillus thuringiensis toxin	Proceedings of the National Academy	101
Management of herbicide-tolerant oilseed rape in Europ	Environmental Biosafety Research	3
The co-existence between transgenic and non-transgeni	Environmental Biosafety Research	4
Employing a composite gene-flow index to numerically q	Environmental Biosafety Research	4
Life cycle and potential gene flow of volunteer oilseed ra	Weed Research	45
Persistence of seeds from crops of conventional and hei	Proceedings of the Royal Society B: E	272
Low frequency of transgene flow from Bt/CpTI rice to its	The New Phytologist	168
Mitigation of establishment of Brassica napus transgene	Plant Biotechnology Journal	4
The Current Status and Environmental Impacts of Glyph	J Environ Qual	35
Spatial impact of isolation distances between parcels of	Communications in Agricultural and A	71
New case studies on the coexistence of GM and non-GM crops in European agriculture		
Co-existence of agricultural production systems	Trends Biotechnol	24
Pollen-mediated gene flow in maize in real situations of (	Plant Biotechnology Journal	4

Pharmaceutical and Industrial Traits in Genetically Modif	American Journal of Agricultural Econ	88
Outcrossing and coexistence of genetically modified with	NJAS - Wageningen Journal of Life S	54
Gene flow from transgenic to nontransgenic soybean pla	Genetics and Molecular Research	6
Gene flow in maize fields with different local pollen dens	International journal of biometeorolog	51
The effect of wind direction on cross-pollination in wind-p	Ecological Applications: A Publication	17
Effect of pollinator abundance on self-fertilization and ge	Ecological Applications: A Publication	17
Pollen-mediated intraspecific gene flow from herbicide re	Transgenic Research	16
Transgene flow to hybrid rice and its male-sterile lines	Transgenic Research	16
Air-mediated pollen flow from genetically modified to cor	Ecological Applications: A Publication	17
Meteorological input data requirements to predict cross-p	Environmental Biosafety Research	5
Pollen-Mediated Gene Flow in Wheat at the Commercial	Crop Science	47
Facilitating co-existence by tracking gene dispersal in co	Environmental Biosafety Research	6
Dramatic reduction of crop-to-crop gene flow within a sh	The New Phytologist	173
Definition and feasibility of isolation distances for transge	Transgenic Research	17
A wheat genomic DNA fragment reduces pollen transmis	Transgenic Research	16
Gene flow from GM glyphosate-tolerant to conventional s	Environmental Biosafety Research	5
Gene Flow, Risk Assessment and the Environmental Re	Critical Reviews in Plant Sciences	27
How to model and simulate the effects of cropping syste	Environmental Science and Pollution	16
Regulating coexistence of GM and non-GM crops withou	Trends in Biotechnology	26
A method to search for optimal field allocations of transg	Environmental Biosafety Research	7
Coexistence in the EU-return of the moratorium on GM c	Nature Biotechnology	26
Long-term persistence of GM oilseed rape in the seedba	Biology Letters	4
Outcrossed cottonseed and adventitious Bt plants in Ariz	Environmental Biosafety Research	7
Coexistence in Maize: Do Nonmaize Buffer Zones Redu	Crop Science	48
Gene flow from glyphosate-resistant crops	Pest Management Science	64
Potential for seed-mediated gene flow in agroecosystem	Transgenic Research	18
Sowing and Flowering Delays Can Be an Efficient Strate	Crop Science	48
Establishment of a rice transgene flow model for predicti	The New Phytologist	180
Comparative study of the efficiency of buffer zones and I	European Journal of Agronomy	30
Pollen dispersal in sugar beet production fields	Theoretical and Applied Genetics	118
In-field frequencies and characteristics of oilseed rape w	Environmental Biosafety Research	8
Dispersal of Transgenes through Maize Seed Systems in	PLoS ONE	4
Strategies for coexistence of GM and non-GM soy from i	Environmental Biosafety Research	8
Evaluation of pollen dispersal and cross pollination using	Environmental Biosafety Research	8
The variability of processes involved in transgene disper	Environmental Science and Pollution	16
Landscape-scale distribution and persistence of genetic	Environmental Science and Pollution	17
Pollen-mediated gene flow from transgenic safflower (C	Environmental Biosafety Research	8
Effect of volunteers on maize gene flow	Transgenic Research	18
Genetic load and transgenic mitigating genes in transge	BMC Biotechnology	9
Risk assessment of transgenic apomictic tetraploid bahi	TAG Theoretical and Applied Genetic	119
Testing coexistence and genetic containment for an autc	Transgenic Research	18
Low crop plant population densities promote pollen-med	Transgenic Research	18
Emergence and Persistence of Volunteer Flax in Wester	Agronomy Journal	102
Gene flow from transgenic common beans expressing th	GM crops	1
Pollen- and Seed-Mediated Transgene Flow in Commer	PLoS ONE	5
Landscape-scale distribution and persistence of genetic	Environmental Science and Pollution	17
Coexistence in Maize: Isolation Distance in Dependence	Crop Science	50
Going to ridiculous lengths-European coexistence regul	Nature Biotechnology	28
Distances needed to limit cross-fertilization between GM	Nature Biotechnology	28
Development of sampling approaches for the determinat	Analytical and Bioanalytical Chemistry	396
Three-dimensional prediction of maize pollen dispersal a	Environmental Biosafety Research	8
Weather Effects on Cross-Pollination in Maize	Crop Science	50
Does flax have the answer to the GM mix-up|?	Heredity	106
Pollen-Mediated Gene Flow in Commercial Fields of Spr	Crop Science	51
Coexistence between conventional, organic and GM cro	GM crops	2
Gene flow from herbicide-tolerant GM rice and the heter	Planta	233
Field Simulation of Transgenic Seed Admixture Dispersi	Crop Science	51
Cross-fertilization between genetically modified and non-	Environmental Biosafety Research	9
Gene flow in Prunus species in the context of novel trait	Environmental Biosafety Research	9

Pollen-mediated gene flow in flax (Linum usitatissimum L	Heredity	106
Cultivation of GMO in Germany: support of monitoring ai	Environmental Sciences Europe	23
Assessment of the influence of field size on maize gene	Transgenic Research	
Impact of gene stacking on gene flow: the case of maize	Transgenic Research	
Pollen Competition as a Reproductive Isolation Barrier R	PLoS ONE	6
Gene Flow in Genetically Modified Wheat	PLoS ONE	6
A flexible quantitative methodology for the analysis of ge	TAG Theoretical and Applied Genetic	122
Coexistence in Maize: Effect on Pollen-Mediated Gene F	Crop Science	51
The Establishment of Genetically Engineered Canola Po	PLoS ONE	6
Does flax have the answer to the GM mix-up?	Heredity	106
Wind tunnel and field assessment of pollen dispersal in s	Journal of plant research	124
Prioritizing GM crop monitoring sites in the dynamics of c	Journal of environmental monitoring: .	14
Feral genetically modified herbicide tolerant oilseed rape	Transgenic Research	21
Surveying of pollen-mediated crop-to-crop gene flow fro	GM crops & food	3
Pollen-mediated gene flow in wheat (Triticum aestivum L	Transgenic Research	
Seed bank persistence of genetically modified canola in	Environmental Science and Pollution	19
Assessment of the influence of field size on maize gene	Transgenic Research	21
Assessing the ecological risks from the persistence and	Transgenic Research	21
The potential for gene flow between cultivated and wild s	American Journal of Botany	89
Molecular strategies for gene containment in transgenic	Nature Biotechnology	20
Fitness of backcross six of hybrids between transgenic c	Molecular Ecology	11
Bt-transgenic oilseed rape hybridization with its weedy re	Environmental Biosafety Research	1
Biodiversity (Communications arising): Maize transgene	Nature	416
Using seed purity data to estimate an average pollen me	TAG. Theoretical and applied genetic:	104
Destiny of a transgene escape from Brassica napus into	TAG. Theoretical and applied genetic:	105
Biodiversity (Communications arising): Suspect evidence	Nature	416
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Additive transgene expression and genetic introgression	TAG. Theoretical and applied genetic:	107
Frequency-dependent fitness of hybrids between oilseed	American Journal of Botany	90
Consequences of recurrent gene flow from crops to wild	Proceedings of the Royal Society B: E	270
Crop-to-wild gene flow, introgression and possible fitnes	Environmental Biosafety Research	2
Bt crops: predicting effects of escaped transgenes on th	Environmental Biosafety Research	2
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Hybridization between transgenic Brassica napus L. and	TAG Theoretical and Applied Genetic:	107
Environmental biosafety and transgenic potato in a centr	Nature	432
Gene Flow from Cultivated Rice (Oryza sativa) to its We	Annals of Botany	93
Geneflow from GM plants – towards a more quantitative	Trends in Biotechnology	22
Hybridization and backcrossing between transgenic oilse	Environmental Biosafety Research	3
Impact of ecological factors on the initial invasion of Bt tr	TAG Theoretical and Applied Genetic:	109
Evidence for landscape-level, pollen-mediated gene flow	Proceedings of the National Academy	101
Stable Bacillus thuringiensis (Bt) toxin content in interspe	Molecular Ecology	13
Inheritance of GFP-Bt transgenes from Brassica napus i	Environmental Biosafety Research	3
Transgene expression and fitness of hybrids between GI	Environmental Biosafety Research	4
Transgene escape: what potential for crop–wild hybridiz	Molecular Ecology	14
Growth, productivity, and competitiveness of introgresse	Molecular Ecology	14
Transgene dispersal through pollen	Methods Mol Biol	286
Calming Fears, No Foreign Genes Found in Mexico's Ma	Science	309
Risks and consequences of gene flow from herbicide-re	Pest Management Science	61
Absence of detectable transgenes in local landraces of r	Proceedings of the National Academy	102
Tiered tests to assess the environmental risk of fitness c	Environmental Biosafety Research	4
Monitoring the escape of transgenic oilseed rape around	Environmental Biosafety Research	4
To self, or not to self... A review of outcrossing and polle	Heredity	95
Mitigation using a tandem construct containing a selectiv	Plant Biotechnology Journal	4
Fitness of hybrids between rapeseed (Brassica napus) a	Molecular Ecology	15

Detection of feral transgenic oilseed rape with multiple-h	Environmental Biosafety Research	5
Evaluating genetic containment strategies for transgenic	Trends in Biotechnology	24
Directed microspore-specific recombination of transgeni	Plant Biotechnology Journal, Plant Bic	4, 4
Establishment of transgenic herbicide-resistant creeping	Molecular Ecology	15
Molecular Analysis, Cytogenetics and Fertility of Introgre	Genetics	174
The responses of crop - wild Brassica hybrids to simulat	Environmental Biosafety Research	5
A large-scale field study of transgene flow from cultivate	Plant Biotechnology Journal	4
Transgene escape in sugar beet production fields: data f	Environmental Biosafety Research	6
Genetic and Ecological Consequences of Transgene Flc	Green Gene Technology	107
Emission Rates, Survival, and Modeled Dispersal of Viat	Crop Science	47
Long-distance GM pollen movement of creeping bentgra	Ecological Applications: A Publication	17
Investigation of rice transgene flow in compass sectors t	TAG Theoretical and Applied Genetic:	115
Transfer of glyphosate resistance: evidence of hybridizat	American Journal of Botany	94
Environmental Risk Assessment of Genetically Engineer	Journal of Environment Quality	37
Dispersal of viable row-crop seeds of commercial agricu	Environmental Biosafety Research	7
Can we stop transgenes from taking a walk on the wild s	Molecular Ecology	17
Potential Hybridization of Flax with Weedy and Wild Rel	Crop Science	48
Dispersal and persistence of genetically modified oilseec	Environmental Science and Pollution	16
Long-distance pollen flow assessment through evaluatio	Proceedings of the National Academy	105
Impact of Transgene Inheritance on the Mitigation of Ge	Genetics	180
Do escaped transgenes persist in nature? The case of a	Molecular Ecology	17
Rapeseed cytoplasm gives advantage in wild relatives a	New Phytologist, New Phytologist	183, 183
Performance of Hybrids between Weedy Rice and Insec	Journal of integrative plant biology	51
Quantifying the introgressive hybridisation propensity be	Environmental Monitoring and Assess	149
Fitness and maternal effects in hybrids formed between	Pest Management Science	65
A strategy to provide long-term control of weedy rice whi	Pest Management Science	65
Risk assessment of genetically engineered crops: fitnes:	Ecological Applications: A Publication	19
Gene flow from genetically modified rice to its wild relati	Biotechnology Advances	27
Monitoring the occurrence of genetically modified oilseec	Environmental Biosafety Research	8
Transgenes in Mexican maize: molecular evidence and r	Molecular Ecology	18
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Potential gene flow from transgenic rice (Oryza sativa L.	Pest Management Science	65
Gene Flow, Invasiveness, and Ecological Impact of Gen	Annals of the New York Academy of S	1168
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Existence of vigorous lineages of crop-wild hybrids in Le	Environmental Biosafety Research	8
Evaluating biological containment strategies for pollen-m	Environmental Biosafety Research	9
Potential Hybridization of Genetically Engineered Tritical	Crop Science	50
Backcrosses to Brassica napus of hybrids between B. ju	Plant science: an international journal	179
Glyphosate drift promotes changes in fitness and transg	Annals of Botany	106
Hybridization between GM soybean (Glycine max (L.) M	Environmental Biosafety Research	9
Keeping the genie in the bottle: transgene biocontainmer	Trends in Biotechnology	28
Rapeseed species and environmental concerns related t	GM crops	1
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Apomixis and ploidy barrier suppress pollen-mediated ge	TAG Theoretical and Applied Genetic:	121
Potential gene flow of two herbicide-tolerant transgenes	TAG Theoretical and Applied Genetic:	120
Identification of a hybridization window that facilitates siz	Transgenic Research	19
Identification of a hybridization window that facilitates siz	Transgenic Research	19
U.S. EPA Regulation of Plant-Incorporated Protectants: A	J. Agric. Food Chem.	59
Seeds of a Possible Natural Hybrid between Herbicide-F	GM crops	2
Field testing, gene flow assessment and pre-commercial	Transgenic Research	
Informal "Seed" Systems and the Management of Gene	PLoS ONE	6
Transgene introgression in crop relatives: molecular evic	Trends in Biotechnology	29
Glyphosate-drift but not herbivory alters the rate of trans	New Phytologist, New Phytologist	191, 191
Changes in fitness-associated traits due to the stacking	Heredity	107
Gene Flow from Herbicide-Resistant Crops: It's Not Just	Journal of agricultural and food chemi	59
Introgression potential between safflower (Carthamus tir	BMC Plant Biology	11

An efficient and rapid transgenic pollen screening and de	Biotechnology Journal, Biotechnology	6, 6
The bucket and the searchlight: formulating and testing r	Environmental Biosafety Research	9
Agronomic performance of F1, F2 and F3 hybrids betwe	Pest Management Science, Pest Man	67, 67
Changes in constructed Brassica communities treated w	Ecological Applications: A Publication	21
Recent long-distance transgene flow into wild population	Molecular Ecology	20
Innate factors causing differences in gene flow frequenc	Pest Management Science	67
Gene flow and simulation of transgene dispersal from hy	New Phytologist, New Phytologist	193, 193
A model to predict the frequency of integration of fitness	Transgenic Research	21
Gene flow matters in switchgrass (Panicum virgatum L.)	Ecological Applications: A Publication	22
A Built-In Mechanism to Mitigate the Spread of Insect-Re	PLoS ONE	7
Illegal gene flow from transgenic creeping bentgrass: the	Molecular Ecology	21
Limited Fitness Advantages of Crop-Weed Hybrid Proge	PLoS ONE	7
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Molecular strategies for gene containment in transgenic	Nature Biotechnology	20
Integration of foreign DNA during natural transformation	Proceedings of the National Academy	99
Monitoring the persistence of genes deriving from geneti	Mededelingen (Rijksuniversiteit te Ge	67
Prokaryotic evolution in light of gene transfer	Molecular biology and evolution	19
Effects of transgenic glufosinate-tolerant oilseed rape (B	FEMS Microbiol Ecology	41
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Evolution and spread of antibiotic resistance	J Intern Med	252
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Ecological and molecular maintenance strategies of mot	FEMS Microbiol Ecology	42
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Spread of recombinant DNA by roots and pollen of trans	Appl Environ Microbiol	69
Population dynamics and gene transfer in genetically mc	Molecular Ecology	12
Monitoring the spread of recombinant DNA from field plc	Transgenic Research	12
An assessment of factors affecting the likelihood of horiz	Collection of Biosafety Reviews	1
Homology-dependent DNA transfer from plants to a soil	Transgenic Research	12
Lack of detection of ampicillin resistance gene transfer fr	FEMS Microbiology Ecology	48
Problems in monitoring horizontal gene transfer in field t	Nature Biotechnology	22
Monitoring and modeling horizontal gene transfer	Nature Biotechnology	22
Gene transfer to plants by diverse species of bacteria	Nature	433
The fate of the recombinant DNA in corn during compos	J Environ Sci Health B	40
Quantitation of Transgenic Plant DNA in Leachate Wate	J Agric Food Chem	53
Real-Time Polymerase Chain Reaction Quantification of	J. Agric. Food Chem.	53
Experimental methods for assaying natural transformatic	Methods in enzymology	395
Studying plasmid horizontal transfer in situ: a critical revi	Nature reviews microbiology	3
Mechanisms of, and barriers to, horizontal gene transfer	Nature reviews microbiology	3
Sampling the Antibiotic Resistome	Science	311
Quantification and Persistence of Recombinant DNA of I	J. Agric. Food Chem.	55
Use of Real-Time Polymerase Chain Reaction (PCR) an	J. Agric. Food Chem.	55
Detection of potential transgenic plant DNA recipients ar	Environmental Biosafety Research	6
Release and persistence of extracellular DNA in the env	Environmental Biosafety Research	6
Fate of transgenic plant DNA in the environment	Environmental Biosafety Research	6
Release and leaching of plant DNA in unsaturated soil c	Ecotoxicology and Environmental Saf	68
Influence of flanking homology and insert size on the trai	Environmental Biosafety Research	6
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Antibiotic-resistant soil bacteria in transgenic plant fields	Proceedings of the National Academy	105
Factors Affecting the Presence and Persistence of Plant	Weed Science	56
Molecular study of time dependent changes in DNA stab	Forensic Science International	177
Risks from GMOs due to Horizontal Gene Transfer	Environmental Biosafety Research	7
Real-Time Polymerase Chain Reaction Monitoring of Re	J. Agric. Food Chem.	56
Strategy for in situ detection of natural transformation-ba	Applied and Environmental Microbiolc	74
Extraction of DNA from Soil for Analysis of Bacterial Div	J. Agric. Food Chem.	56
Soil persistence of DNA from transgenic poplar	Environmental Biosafety Research	8
Roundup Ready® soybean gene concentrations in field :	FEMS Microbiology Letters	291
Visual evidence of horizontal gene transfer between plar	Applied and Environmental Microbiolc	75
Plant leaf mass loss and DNA release in freshwater sedi	Ecotoxicology and Environmental Saf	72

Kinetics of plant material mass loss and DNA release in	Ecotoxicology and Environmental Saf	73
Molecular aspects of gene transfer and foreign DNA acq	Applied Microbiology and Biotechnolo	86
Long-term persistence and bacterial transformation pote	Research in microbiology	161
Leaching and transformability of transgenic DNA in unsa	Ecotoxicology and Environmental Saf	73
Development of real time PCR assays for detection and	Transgenic Research	19
Development of a new tool to improve gene transfer freq	Journal of microbiological methods	86
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Lack of glyphosate resistance gene transfer from Round	Zeitschrift Für Naturforschung. C, Jou	66
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What can we learn from tobacco and other Solanaceae	American Journal of Botany	98
Detection of genetically modified microorganisms in soil	Research in microbiology	162
The Shared Antibiotic Resistome of Soil Bacteria and Hu	Science	337
Fate of invading bacteria in soil and survival of transform	Research in microbiology	163
Assuring the safety of genetically modified (GM) foods: t	Journal of Biotechnology	98
The Safety of Genetically Modified Foods Produced thro	Toxicological Sciences	71
Exploitation of molecular profiling techniques for GM foo	Current Opinion in Biotechnology	14
Metabolite Profiling of Tomato (Lycopersicon esculentun	J. Agric. Food Chem.	51
Unintended effects and their detection in genetically mod	Food and Chemical Toxicology	42
NMR profiling of transgenic peas	Plant Biotechnology Journal	2
NMR and HPLC-UV Profiling of Potatoes with Genetic M	J. Agric. Food Chem.	52
NMR-based metabonomic study of transgenic maize	Phytochemistry	65
Hierarchical metabolomics demonstrates substantial cor	Proceedings of the National Academy	102
Metabolite fingerprinting in transgenic lettuce	Plant Biotechnology Journal	3
A Microarray-Based Comparative Analysis of Gene Expr	Transgenic Research	14
High-lysine corn produced by the combination of enhanc	Plant Biotechnology Journal	3
Metabolic engineering of dhurrin in transgenic Arabidops	Proceedings of the National Academy	102
Comparison of Tuber Proteomes of Potato Varieties, Lar	Plant Physiology	138
The stability of the Arabidopsis transcriptome in transger	The Plant Journal	41
Molecular composition of leaves and stems of genetically	Journal of Environmental Quality	34
The metabolic profiles of transgenic cucumber lines vary	Cellular & Molecular Biology Letters	10
A metabolomic study of substantial equivalence of field-g	Plant Biotechnol J	4
Transgenesis has less impact on the transcriptome of wl	Plant Biotechnology Journal	4
Proteomics as an Emergent Tool for Identification of Stre	Chromatographia	63
Problems with the "omics"	TrAC Trends in Analytical Chemistry	25
Metabolite profiling of carotenoid and phenolic pathways	Phytochemistry	67
A metabonomic study of transgenic maize (Zea mays) s	Journal of Experimental Botany	57
Evaluation of a Non-Targeted "Omic" Approach in the Sa	Plant Biology	8
Unintended effects in genetically modified crops: reveale	Trends in Biotechnology	24
cDNA Microarray Screening in Food Safety	Toxicology	221
Assessing the potential for unintended effects in genetic	Transgenic Research	15
High-Level Tryptophan Accumulation in Seeds of Transg	Journal of Experimental Botany	57
PROTEOMIC ANALYSIS OF A GENETICALLY MODIFIE	Maydica	52
A multiway approach to analyze metabonomic data: a st	Analytical Biochemistry	371
Integrated Metabolomic and Transcriptomic Analyses of	Journal of Experimental Botany	58
Manipulation of Phytoene Levels in Tomato Fruit: Effects	The Plant Cell Online	19
Flavonoid profiling among wild type and related GM whe	Plant Molecular Biology	65
Metabolomics for metabolically manipulated plants: effec	Metabolomics	3
Differentiation of organically and conventionally produce	Analytical and Bioanalytical Chemistry	388
Characterization of Protein Fractions from Bt-Transgenic	J. Agric. Food Chem.	55
Are GM and conventionally bred cereals really different?	Trends in Food Science & Technology	18
Microarray analyses reveal that plant mutagenesis may i	Proceedings of the National Academy	105
Nitrogen Metabolism and Seed Composition As Influenc	J. Agric. Food Chem.	56
Variation of metabolic profiles in developing maize kerne	Journal of Experimental Botany	59
Effect of Transgenes on Global Gene Expression in Soy	J. Agric. Food Chem.	56
Lack of repeatable differential expression patterns betwe	Plant Molecular Biology	68
Comparative metabolomic study of transgenic versus co	Journal of Chromatography A	1195
Using Metabolomics To Estimate Unintended Effects in	Journal of Biomolecular Techniques	19
Linking transcript profiles to metabolites and metabolic p	Plant Omics Journal	1
Capillary Electrophoresis Time-of-Flight Mass Spectrom	Anal. Chem.	80

Transcriptome Response to Glyphosate in Sensitive and	J. Agric. Food Chem.	56
Proteomics as a Complementary Tool for Identifying Uni	J. Proteome Res.	7
The pleiotropic effects of the bar gene and glufosinate o	Plant Biotechnol J	7
Establishing Substantial Equivalence: Transcriptomics	Transgenic Wheat, Barley and Oats	478
Establishing Substantial Equivalence: Metabolomics	Transgenic Wheat, Barley and Oats	478
Transcriptome analysis of nitrogen-efficient rice over-ex	Plant Biotechnology Journal	7
Unintended changes in protein expression revealed by p	PROTEOMICS	9
Gene expression profiles of MON810 and comparable n	Transgenic Research	18
NMR metabonomics for mammalian cell metabolism stu	Bioanalysis	1
Transgenic peas expressing an α-amylase inhibitor gen	ELECTROPHORESIS	30
Metabolic profiles of genetically modified potatoes using	Biotechnology and Bioprocess Engine	14
Application of metabonomic analytical techniques in the	British Journal of Pharmacology	157
Metabolomics of transgenic maize combining Fourier tra	Journal of Chromatography A	1216
Establishing Substantial Equivalence: Proteomics	Transgenic Wheat, Barley and Oats	478
Selectable marker genes and unintended changes to the	Plant Biotechnol J	7
Characterization of polyadenylated cryIA(b) transcripts ir	Analytical and Bioanalytical Chemistry	396
NMR Metabolic Profiling of Transgenic Maize with the Cr	J. Agric. Food Chem.	57
Proteome research in food science	Chem. Soc. Rev.	38
Distinguishing transgenic from non-transgenic Arabidops	Journal of Genetics and Genomics	36
Metabolic profiling of transgenic rice with cryIAc and sck	Journal of Chromatography B	877
Transcriptome analysis reveals absence of unintended e	BMC Genomics	11
Genetic and Environmental Influence on Maize Kernel P	J. Proteome Res.	9
Assays of the production of harmful substances by gene	Transgenic Research	20
Comparison of two GM maize varieties with a near-isoge	Plant Biotechnology Journal	8
Plant natural variability may affect safety assessment da	Regulatory Toxicology and Pharmaco	58
Can –omics inform a food safety assessment?	Regulatory Toxicology and Pharmaco	58
Natural variation explains most transcriptomic changes a	Plant Molecular Biology	73
Metabolome variability in crop plant species – When, wh	Regulatory Toxicology and Pharmaco	58
Gene expression profiling for food safety assessment: E	Regulatory Toxicology and Pharmaco	58
Evaluating biological variation in non-transgenic crops: E	Regulatory Toxicology and Pharmaco	58
Unintended Compositional Changes in Transgenic Rice	J. Agric. Food Chem.	58
Transcriptome and metabolome profiling of field-grown t	Proceedings of the National Academy	107
Metabolic profiling analysis of genetically modified rice s	Plant Biotechnology	27
XENOBIOTIC METABOLISM – A VIEW THROUGH THE	Chemical research in toxicology	23
Stability of the MON 810 transgene in maize	Plant Molecular Biology	74
Stability of the MON 810 transgene in maize	Plant Molecular Biology	74
Influence of the Input System (Conventional versus Orga	J. Agric. Food Chem.	58
NMR-Metabolic Methodology in the Study of GM Foods	Nutrients	2
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We are what we eat: food safety and proteomics	J. Proteome Res.	
MS-based analytical methodologies to characterize gen	Mass Spectrometry Reviews	30
Review: Current applications and challenges for liquid ch	Rapid Communications in Mass Spec	25
Molecular profiling — a tool for addressing emerging ga	Environment International	37
Foodomics: MS-based strategies in modern food scienc	Mass Spectrometry Reviews	
NMR-based plant metabolomics: where do we stand, wh	Trends in Biotechnology	29
Covering Chemical Diversity of Genetically-Modified Ton	PLoS ONE	6
Safety assessment of nonbrowning potatoes: opening th	Plant Biotechnology Journal	9
NMR techniques in biomedical and pharmaceutical anal	Journal of Pharmaceutical and Biome	55
Only half the transcriptomic differences between resistar	Plant Biotechnology Journal	9
Unsupervised Principal Component Analysis of NMR Me	J. Agric. Food Chem.	59
Evaluation of Genetically Engineered Crops Using Trans	Plant Physiology	155
Origins of Metabolic Profiling	Metabolic Profiling	708
New insights on proteomics of transgenic soybean seed	Analytical and Bioanalytical Chemistry	402
Metabolic profiling based on LC/MS to evaluate unintenc	Plant molecular biology	78
Metabolite profiling of maize kernels--genetic modificatio	Journal of agricultural and food chemi	60
Proteomics insight into the biological safety of transgenic	Journal of proteome research	11
Non-uniform distribution pattern for differentially express	PLoS ONE	7

Metabolomic plasticity in GM and non-GM potato leaves	Journal of agricultural and food chemi	60
Metabolite profiles of rice cultivars containing bacterial b	Acta biochimica et biophysica Sinica	44
Glycoalkaloid Content and Chemical Composition of Pot	J. Agric. Food Chem.	50
Substantial equivalence—an appropriate paradigm for th	Toxicology	181-182
Comparison of the Nutritional Profile of Glyphosate-Tole	J. Agric. Food Chem.	50
Comparative safety assessment for biotech crops	Trends in Biotechnology	21
Composition of Grain and Forage from Corn Rootworm-I	J. Agric. Food Chem.	52
Bollgard II Cotton: Compositional Analysis and Feeding	J. Agric. Food Chem.	52
Compositional Equivalency of Cry1F Corn Event TC627!	J. Agric. Food Chem.	52
The Composition of Grain and Forage from Glyphosate	J. Agric. Food Chem.	52
The safety assessment of foods from transgenic and clo	Revue Scientifique Et Technique (Inte	24
Glyphosate-Tolerant Soybeans Remain Compositionally	J. Agric. Food Chem.	53
Rice (Oryza sativa L.) Containing the bar Gene Is Comp	J. Agric. Food Chem.	53
A metabolomic study of substantial equivalence of field-(	Plant Biotechnology Journal	4
Shall I compare thee to a GM potato?	Trends in Genetics	22
Statistical analysis used in the nutritional assessment of	Regulatory Toxicology and Pharmaco	44
Glyphosate-Tolerant Alfalfa Is Compositionally Equivaler	J. Agric. Food Chem.	54
An Introduction to the Food/Feed Safety Consensus Documents of the Task Force. Series on the Safety of		
Absence of Effect after Introducing Bacillus thuringiensis	Journal of Food Science	71
Chemical Composition of Glyphosate-Tolerant Soybean	J. Agric. Food Chem.	55
Compositional assessment of event DAS-59122-7 maize	Regulatory Toxicology and Pharmaco	47
Comparison of the Forage and Grain Composition from I	J. Agric. Food Chem.	55
Composition of Forage and Grain from Second-Generati	J. Agric. Food Chem.	56
Nutritional and safety assessment of foods and feeds nu	Asia Pacific Journal of Clinical Nutritic	17 Suppl 1
Safety assessment considerations for food and feed deri	Food and Chemical Toxicology	46
Composition of Grain, Forage, and Processed Fractions	J. Agric. Food Chem.	56
Comparison of Sugar, Acids, and Volatile Composition ir	J. Agric. Food Chem.	56
Assessment of the Nutritional Values of Genetically Mod	J. Agric. Food Chem.	56
The forage and grain of MON 87460, a drought-tolerant	Journal of agricultural and food chemi	57
Compositional assessment of transgenic crops: an idea	Trends in Biotechnology	27
Compositions of Forage and Seed from Second-Genera	J. Agric. Food Chem.	58
Assessing the natural variability in crop composition	Regulatory toxicology and pharmacol	58
Natural variation in crop composition and the impact of t	Nat Biotech	28
Compositional safety of event DAS-40278-9 (AAD-1) hei	GM crops	1
Tubers from potato lines expressing a tomato Kunitz pro	Plant Biotechnology Journal	8
Transgene × Environment Interactions in Genetically Mo	PLoS ONE	5
Glyphosate Affects Seed Composition in Glyphosate-Re	Journal of agricultural and food chemi	58
Compositional Equivalence of Insect-Protected Glyphos	J. Agric. Food Chem.	
Introduction to Bayesian statistical approaches to compc	Regulatory Toxicology and Pharmaco	60
Evaluation of Compositional Equivalence for Multitrait Bi	J. Agric. Food Chem.	59
A statistical assessment of differences and equivalences	BMC Biotechnology	11
A statistical assessment of differences and equivalences	BMC Biotechnology	11
Compositional variability in conventional and glyphosate	Journal of agricultural and food chemi	59
Stability in the Composition Equivalence of Grain from In	J. Agric. Food Chem.	59
Starch characteristics of transgenic wheat (Triticum aest	Journal of food science	77
Assessing compositional variability through graphical an	Biotechnology & genetic engineering r	28
Composition of transgenic soybean seeds with higher γ-	Journal of agricultural and food chemi	60
Comments on the paper "A statistical assessment of diff	BMC Biotechnology	12
Assuring the safety of genetically modified (GM) foods: t	Journal of Biotechnology	98
Starlink corn: a risk analysis	Environmental Health Perspectives	110
The fate of antibiotic resistance marker genes in transge	Journal of Antimicrobial Chemotherap	49
Food Safety Evaluation of Crops Produced through Biote	Journal of the American College of Nu	21
Soybean meal from roundup ready or conventional soyb	Journal of Animal Science	80
Utilization of Bt corn residues by grazing beef steers and	Journal of Animal Science	80
Safety Assessments and Public Concern for Genetically	Toxicologic Pathology	30
How much food is too much? Threshold doses for allerg	Current Allergy and Asthma Reports	2
Biotechnology and food allergy	Current Allergy and Asthma Reports	2
Degradation of Transgenic DNA from Genetically Modifie	British Journal of Nutrition	87
Safety Assessment and Public Concerns for Genetically	Toxicologic Pathology	30

Construction of a Marker Rescue System in Bacillus sub	Systematic and Applied Microbiology	25
Approaches to Assessment of the Allergenic Potential of	Toxicological Sciences	68
Ultrastructural morphometrical and immunocytochemica	Cell structure and function	27
Ultrastructural analysis of pancreatic acinar cells from m	Journal of anatomy	201
Degradation of Transgenic DNA from Genetically Modifie	British Journal of Nutrition	87
Safety Assessment and Public Concern for Genetically M	Toxicologic Pathology	30
Improvement of growth and nutritive value in chicks with	British Poultry Science	43
Current Methods for Assessing Safety of Genetically Mo	Toxicologic Pathology	30
Increased digestibility of two products in genetically mod	Shokuhin eiseigaku zasshi. Journal of	43
New plant-origin food allergens	Allergy	57 Suppl 72
Prediction of allergenicity of gene-modified foods by sen	Annals of the New York Academy of S	964
Phosphomannose isomerase, a novel plant selection sy	Annals of the New York Academy of S	964
Investigations on genetically modified maize (Bt-maize) i	Archiv für Tierernährung	56
Protein allergenicity assessment of foods produced thro	Annual review of pharmacology and t	42
Genetically engineered foods: implications for food aller	Current Opinion in Allergy and Clinica	2
Factors affecting the determination of threshold doses fo	The Journal of allergy and clinical imn	109
Effect of subchronic feeding of genetically modified corn	Shokuhin eiseigaku zasshi. Journal of	43
Toxicological evaluation of transgenic rice flour with a sy	Journal of the Science of Food and A	82
Genetically modified food and the pediatric allergist	Pediatric allergy and immunology: offi	13
Prediction of food protein allergenicity: a bioinformatic le	In silico biology	2
Potential Adverse Health Effects of Genetically Modified	Journal of Toxicology and Environmer	6
Clinical and laboratory investigation of allergy to genetic	Environmental Health Perspectives	111
Evaluation of transgenic event Bt11 hybrid corn in broiler	Poultry Science	82
The 5-enolpyruvylshikimate-3-phosphate synthase of gly	Molecules and cells	15
Safety assessment for genetically modified sweet peppe	Toxicology	188
Detection of corn intrinsic and recombinant DNA fragme	Journal of Animal Science	81
Detection of genetically modified maize DNA fragments i	Veterinary and Human Toxicology	45
Effects of Feeding Silage and Grain from Glyphosate-To	Journal of Dairy Science	86
Fate of Genetically Modified Maize DNA in the Oral Cavi	British Journal of Nutrition	89
Uptake of amplifiable fragments of retrotransposon DNA	Molecular Genetics and Genomics	270
Key issues for the assessment of the allergenic potential	Environmental Health Perspectives	111
Influence of Glyphosate-Tolerant (event nk603) and Cor	Journal of Dairy Science	86
Food biotechnology: is this good or bad? Implications to	Annals of Allergy, Asthma & Immunol	90
Genetically modified soybeans and food allergies	Journal of Experimental Botany	54
Genetic modification removes an immunodominant aller	Plant Physiology	132
Performance of Lactating Dairy Cows Fed Corn as Whol	Journal of Dairy Science	86
Improved evaluation of potential allergens in GM food	Trends in Biotechnology	21
Attempts to detect transgenic and endogenous plant DN	Poultry Science	82
Determining whether transgenic and endogenous plant D	Journal of Animal Science	81
Marker rescue studies of the transfer of recombinant DN	Applied and Environmental Microbiolc	69
Workshop Overview: Approaches to the Assessment of	Toxicological Sciences	73
Fine structural analyses of pancreatic acinar cell nuclei f	European journal of histochemistry: E	47
Introduction: what are the issues in addressing the allerg	Environmental Health Perspectives	111
In vivo studies on possible health consequences of gene	Nutrition and Health	17
Genetically modified foods: potential human health effec	Food safet: contaminants and Toxins	
Development and Use of an ELISA Test to Detect IgE Ar	International Archives of Allergy and I	132
The Safety of Genetically Modified Foods Produced thro	Toxicological Sciences	71
Comparison of broiler performance when fed diets conta	Poultry Science	82
Safety Assessment of Foods Produced Through Agricult	Nutrition Reviews	61
Safety assessment of Bt 176 maize in broiler nutrition: d	Archives of Animal Nutrition	57
Animal models to detect allergenicity to foods and genet	Environmental Health Perspectives	111
Use of quantitative real-time and conventional PCR to as	Journal of Biotechnology	112
A generational study of glyphosate-tolerant soybeans on	Food and Chemical Toxicology	42
Effects of Feeding Rations with Genetically Modified Wh	Journal of Dairy Science	87
Fate of Maize Intrinsic and Recombinant Genes in Calve	Journal of Food Protection	67
Quality and safety evaluation of genetically modified pot	Food / Nahrung	48
Safety testing and regulation of genetically engineered fo	Biotechnology & genetic engineering r	21
Results of a 13 week safety assurance study with rats fe	Food and Chemical Toxicology	42
Genetic modification of food allergens	Annals of Allergy, Asthma & Immunol	93

Food processing: effects on allergenicity	Current Opinion in Allergy and Clinica	4
Sensitive PCR Analysis of Animal Tissue Samples for Fr	J. Agric. Food Chem.	52
Assessing the survival of transgenic plant DNA in the hu	Nature Biotechnology	22
Allergy assessment of foods or ingredients derived from	Molecular Nutrition & Food Research	48
The power of tests for bioequivalence in feed experimen	Journal of Animal Science	82 E-Suppl
Relative Stability of Transgene DNA Fragments from GM	British Journal of Nutrition	91
Starlink genetically modified corn and allergenicity in an	Journal of Allergy and Clinical Immun	113
A comparative study of the allergenic potency of wild-typ	APMIS	112
Effects of feeding blends of grains naturally contaminate	Journal of Animal Science	82
The relevance of gene transfer to the safety of food and	Food Chem Toxicol	42
Ultrastructural analysis of testes from mice fed on geneti	European journal of histochemistry: E	48
Persistence of DNA studied in different ex vivo and in vi	Food and Chemical Toxicology	42
Nutritional assessment and fate of DNA of soybean mea	Archives of Animal Nutrition	58
Bt176 corn in poultry nutrition: physiological characteristi	Poultry Science	84
Lack of detectable allergenicity of transgenic maize and	Journal of Allergy and Clinical Immun	116
Safety Risks for Animals Fed Genetic Modified (GM) Pla	Veterinary Research Communications	29
Industrial Dimensions of Food Allergy	Proceedings of the Nutrition Society	64
Glufosinate herbicide-tolerant (LibertyLink) rice vs. conv	Journal of Animal Science	83
GM Organisms and the EU Regulatory Environment: All	Proceedings of the Nutrition Society	64
Detection of transgenic and endogenous plant DNA frag	Journal of agricultural and food chemi	53
Animal nutrition with feeds from genetically modified plar	Archives of Animal Nutrition	59
Long term feeding of Bt-corn--a ten-generation study wit	Archives of Animal Nutrition	59
Antibiotic resistance markers in genetically modified plar	The Lancet Infectious Diseases	5
Gaining perspective on the allergenicity assessment of g	Expert Review of Clinical Immunology	1
Assessing Genetically Modified Crops to Minimize the Ri	International Archives of Allergy and I	137
Nutrient digestibility in sheep fed diets containing Round	Journal of Animal Science	83
Risks of allergic reactions to biotech proteins in foods: p	Allergy	60
Degradation of Cry1Ab Protein from Genetically Modifie	J. Agric. Food Chem.	53
Reversibility of hepatocyte nuclear modifications in mice	European Journal of Histochemistry	49
Assessing the Transfer of Genetically Modified DNA fron	Transgenic Research	14
Can we Predict or Avoid the Allergenic Potential of Gene	International Archives of Allergy and I	137
Detection of genetically modified corn (Bt176) in spiked	Journal of AOAC International	88
Effect of Corn Silage from an Herbicide-Tolerant Genetic	Journal of Dairy Science	88
Effects of grazing residues or feeding corn from a corn r	Journal of Animal Science	83
Effect of Bt corn on broiler growth performance and fate	Poultry Science	84
Multigeneration Reproductive and Developmental Toxici	Journal of Toxicology and Environmer	68
The Mechanism of Naked DNA Uptake and Expression	Advances in Genetics	Volume 54
Genetically modified and wild soybeans: An immunologi	Allergy and Asthma Proceedings	26
Conventional and real-time polymerase chain reaction a	British Journal of Nutrition	96
The effect of diet containing genetically modified triticale	Anim. Sci. Pap. Rep	24
The digestive fate of Escherichia coli glutamate dehydro	Journal of Animal Science	84
Availability of genetically modified soybean meal in rainb	Fisheries Science	72
Bioinformatics of Protein Allergenicity	Molecular Nutrition & Food Research	50
Evaluation of allergenicity of genetically modified soybea	Clinical & Experimental Allergy	36
Results of a 90-day safety assurance study with rats fed	Food and Chemical Toxicology	44
Results of a 90-day safety assurance study with rats fed	Food and Chemical Toxicology	44
Digestion Assays in Allergenicity Assessment of Transge	Environmental Health Perspectives	114
Evaluating the Allergic Risk of Genetically Modified Soyb	Yonsei Medical Journal	47
Transgenic Maize in the Presence of Ampicillin Modifies	British Journal of Nutrition	96
Food Allergies: Prevalence, Molecular Characterization,	Annual Review of Nutrition	26
Degradation of transgenic Cry1Ab DNA and protein in Bt	Journal of Animal Physiology and Anii	90
IgE binding to proteins from sesame and assessment of	Biotechnology Letters	28
Genetically modified plants and food hypersensitivity dis	Pharmacology & Therapeutics	111
High-amylose wheat generated by RNA interference imp	Proceedings of the National Academy	103
Horizontal gene transfer from Bacteria to rumen Ciliates	BMC Genomics	7
Detection of Transgenic and Endogenous Plant DNA in I	J. Agric. Food Chem.	54
Review of the development of methodology for evaluatin	Molecular Nutrition & Food Research	50
In situ studies on the time-dependent degradation of rec	Journal of Animal Science	84
Histological, digestive, metabolic, hormonal and some in	Journal of Fish Diseases	30

Application of current allergy assessment guidelines to n	Journal of AOAC International	90
A Proteomic Study to Identify Soya Allergens – The Hum	International Archives of Allergy and I	144
Effects of Corn Silage Derived from a Genetically Modifi	Journal of Dairy Science	90
Strategies to evaluate the safety of bioengineered foods	International Journal of Toxicology	26
Toxicity Studies of Genetically Modified Plants: A Review	Critical Reviews in Food Science and	47
Report of an Expert Panel on the reanalysis by of a 90-d	Food and Chemical Toxicology	45
Performance of Lactating Dairy Cows Fed Silage and Gr	Journal of Dairy Science	90
Longer resistance of some DNA traits from BT176 maize	International Journal of Immunopatho	20
Studies on feeds from genetically modified plants (GMP)	Animal Feed Science and Technology	133
Serum testing of genetically modified soybeans with spe	Molecular Nutrition & Food Research	51
Comparative safety testing of genetically modified foods	Regulatory Toxicology and Pharmaco	49
Thirteen week feeding study with transgenic maize grain	Food and Chemical Toxicology	45
Subchronic feeding study of DAS-59122-7 maize grain ir	Food and Chemical Toxicology	45
Comparison of broiler performance when fed diets conta	Poultry Science	86
ELISA method for monitoring human serum IgE specific	Regulatory Toxicology and Pharmaco	47
A 90-day safety study in Wistar rats fed genetically modi	Food and Chemical Toxicology	45
Safety testing of GM-rice expressing PHA-E lectin using	Food and Chemical Toxicology	45
Food allergies, cross-reactions and agroalimentary biote	Advances in Medical Sciences	52
What Do We Feed to Food-Production Animals? A Revi	Environmental Health Perspectives	115
A 90-day safety study of genetically modified rice expres	Food and Chemical Toxicology	45
New Analysis of a Rat Feeding Study with a Genetically	Archives of environmental contaminat	52
Comparison of Broiler Performance and Carcass Param	Poultry Science	86
Effect of Feeding Cows Genetically Modified Maize on th	Applied and Environmental Microbiolc	73
Allergenicity testing of GM crops	Nat Biotech	26
Subchronic feeding study of herbicide-tolerant soybean I	Food and Chemical Toxicology	46
Atlantic salmon (Salmo salar L.) parr fed genetically moc	Research in Veterinary Science	84
Molecular profiles: A new tool to substantiate serum ban	Food and Chemical Toxicology	46
Impact of Bacillus thuringiensis toxin Cry1Ab on rumen e	Food and Chemical Toxicology	46
Availability of genetically modified feed ingredient: invest	Fisheries Science	74
Analysis of Cry1Ab toxin bioaccumulation in a food chair	Ecotoxicology	18
Can a genetically-modified organism-containing diet influ	European Journal of Histochemistry	52
The genetically modified foods debate: demystifying the	Analytical and Bioanalytical Chemistry	392
Kinetic and thermodynamic parameters for heat denatur	Journal of Food Science	73
Subchronic feeding study of high oleic acid soybeans (E	Food and Chemical Toxicology	46
Evaluation of protein safety in the context of agricultural	Food and Chemical Toxicology	, Supplemer
A Gene-Shuffled Glyphosate Acetyltransferase Protein fi	Toxicological Sciences	102
Edible safety requirements and assessment standards fo	Food and Chemical Toxicology	46
Transcriptome profiling of the feeding-to-fasting transitio	BMC Genomics	9
Safety and nutritional assessment of GM plants and deri	Food and Chemical Toxicology	, Supplemer
Intestinal and Peripheral Immune Response to MON810	J. Agric. Food Chem.	56
Allergenicity assessment of genetically modified crops[m	Nat Biotech	26
Comparison of grain from corn rootworm resistant transg	Food and Chemical Toxicology	46
Analytical criteria for performance characteristics of IgE I	Food and Chemical Toxicology	46
Performance of Laying Hens Fed Diets Containing DAS-	Poultry Science	87
A three generation study with genetically modified Bt cor	Food and Chemical Toxicology	46
Immunotoxicological studies of genetically modified rice	Toxicology	245
Genetically Engineered Plants and Foods: A Scientist's A	Annual Review of Plant Biology	59
Pancreatic response of rats fed genetically modified soyl	Journal of Applied Toxicology	28
A long-term study on female mice fed on a genetically m	Histochemistry and Cell Biology	130
Comparison of Broiler Performance and Carcass Yields	Poultry Science	87
Comparison of broiler performance when fed diets conta	Poultry Science	87
Establishing objective detection limits for the pepsin dige	Regulatory Toxicology and Pharmaco	52
Evaluation of subchronic toxicity of dietary administered	Food and Chemical Toxicology	46
Development and validation of a sensitive enzyme immu	Analytica Chimica Acta	607
A 104-Week Feeding Study of Genetically Modified Soyt	Food Hygiene and Safety Science (Sf	49
The Problem with Nutritionally Enhanced Plants	Journal of Medicinal Food	11
Safety Assessment of Bacterial Choline Oxidase Protein	J. Agric. Food Chem.	56
A three-year longitudinal study on the effects of a diet co	Livestock Science	113
Ingestion and excretion of two transgenic Bt corn varietie	Transgenic Research	18

Murine models for evaluating the allergenicity of novel pr	Regulatory Toxicology and Pharmaco	54
Subchronic feeding study with genetically modified stack	Food and Chemical Toxicology	47
Subchronic feeding study of grain from herbicide-toleran	Food and Chemical Toxicology	47
Persistence of Plant DNA Sequences in the Blood of Da	J. Agric. Food Chem.	57
Benefits and concerns associated with biotechnology-de	European Review for Medical and Ph	13
Organic and Genetically Modified Soybean Diets: Conse	Plant Foods for Human Nutrition	64
Evaluation of protein quality from genetically modified an	Brazilian Archives of Biology and Tecl	52
A Comparison of the Effects of Three GM Corn Varieties	International Journal of Biological Scie	5
26-Week Oral Safety Study in Macaques for Transgenic	Journal of agricultural and food chemi	57
Health Risks of Genetically Modified Foods	Critical Reviews in Food Science and	49
GT1-7 cell-based cytoxicity screening assay on 96-well r	Drug and Chemical Toxicology	32
Longterm Biosafety Assessment of A Genetically Modifie	The Open Plant Science Journal	3
A 90-day toxicology study of transgenic lysine-rich maize	Food and Chemical Toxicology	47
Safety evaluation of the double mutant 5-enol pyruvylshi	Regulatory Toxicology and Pharmaco	54
Qualitative polymerase chain reaction methods for detec	Journal of AOAC International	92
Endogenous small RNAs in grain: semi-quantification an	Food and chemical toxicology	47
Acute and repeated dose (28 day) mouse oral toxicology	Regulatory Toxicology and Pharmaco	54
Extremely different behaviours in high and low body weig	Journal of Neuroendocrinology	21
Identifying food proteins with allergenic potential: Evoluti	Regulatory Toxicology and Pharmaco	54
Risk assessment of genetically modified crops for nutritic	Nutrition Reviews	67
Safety assessment of a modified acetolactate synthase p	Regulatory Toxicology and Pharmaco	55
Nutritional evaluation of transgenic cottonseed in the rati	Tropical Animal Health and Productio	42
Is This Study Believable? Examples from Animal Studies	http://agribiotech.info/	
Aspects of food processing and its effect on allergen str	Molecular Nutrition & Food Research	53
Letter to the Editor	Critical Reviews in Food Science and	50
Genetic engineering of plant food with reduced allergeni	Frontiers in Bioscience: A Journal anc	14
Safety Assessment of Biotechnology Products for Poten	Toxicological Sciences	110
How Subchronic and Chronic Health Effects can be Neg	International Journal of Biological Scie	5
Proteomic Profiling of Liver from Atlantic Salmon (Salmo	Marine Biotechnology	12
Evaluation of corn grain with the genetically modified inp	Journal of Animal Science	87
Scientific advancement of novel protein allergenicity eva	Food and Chemical Toxicology	47
Safety assessment of Cry1Ab/Ac fusion protein	Food and Chemical Toxicology	47
Evaluation of biotechnology-derived novel proteins for th	Archives of Toxicology	84
Histochemical and morpho-metrical study of mouse intes	European Journal of Histochemistry	54
Use of quantitative real-time PCR to assess the in vitro s	Journal of Animal Physiology and Ani	94
Testing of genetically modified novel proteins for allerge	Archives of Toxicology	84
Safety assessment of Cry1C protein from genetically mo	Regulatory Toxicology and Pharmaco	58
The Impact of Non- and Genetically Modified Soybean D	Journal of Food Science	75
Debate on GMOs Health Risks after Statistical Findings	International Journal of Biological Scie	6
Scientific Opinion on the assessment of allergenicity of GM plants and microorganisms and derived food ar		
In vitro digestion of Cry1Ab proteins and analysis of the i	Journal of agricultural and food chemi	58
Transcriptional and pathway analysis in the hypothalamu	BMC Genomics	11
Effects of organically and conventionally produced feed	British Journal of Nutrition	103
High-throughput gene expression analysis of intestinal ir	Poultry Science	89
The effect of multigenerational diet containing genetically	Polish Journal of Veterinary Sciences	13
Review of animal models designed to predict the potenti	Regulatory Toxicology and Pharmaco	56
Allergenicity Assessment of Genetically Modified Cucum	Journal of agricultural and food chemi	58
Evaluation of the nutritional equivalency of soybean mea	Poultry Science	89
Confirmation of a predicted lack of IgE binding to Cry3Bb	Regulatory Toxicology and Pharmaco	56
Degradation of Cry1Ab protein from genetically modified	Transgenic Research	19
DNA extraction from bovine faeces: current status and fu	Journal of Applied Microbiology	108
Investigation of endogenous soybean food allergens by	Regulatory Toxicology and Pharmaco	58
Zebrafish (Danio Rerio) as a Model for Investigating the	British Journal of Nutrition	103
Effects of long-term feeding of genetically modified corn	Journal of Animal Physiology and Ani	94
Cross-Contamination of Foods and Implications for Food	Current Allergy and Asthma Reports	10
Fate of transgenic DNA and evaluation of metabolic effe	Animal: An International Journal of An	4
Lack of detectable DNA uptake by transformation of sele	BMC Research Notes	3
An optimised sample preparation method for NMR-base	Analyst	135
Tevaluation of transgenic event CBH 351 (StarLink) corr	Animal Science Journal	81

Immunological and Metabolomic Impacts of Administratid	mmunological and Metabolomic Impa	6
Transformation of the US bread wheat 'Butte 86' and sile	GM crops	2
Performance of lactating dairy cows fed corn as whole p	Journal of Dairy Science	94
Metabonomics study of transgenic Bacillus thuringiensis	Molecular BioSystems	7
Fumonisin B1 toxicity in grower-finisher pigs: a compara	International journal of environmental	8
A literature review on the safety assessment of genetical	Environment International	37
Allergenicity Assessment of the Papaya Ringspot Virus (	Journal of agricultural and food chemi	59
Suggested Improvements for the Allergenicity Assessme	Current Allergy and Asthma Reports	11
Fate of Cry1Ab Protein in Agricultural Systems under Sl	J. Agric. Food Chem.	59
Impact of food processing on the safety assessment for	Food and Chemical Toxicology	49
The impact of plant biotechnology on food allergy	Current Opinion in Biotechnology	22
Performance of broiler chickens fed event DAS-40278-9	Regulatory toxicology and pharmacol	60
Performance of broiler chickens fed diets containing DA	GM crops	2
Endogenous allergen upregulation: Transgenic vs. tradit	Food and Chemical Toxicology	49
Biofortification of Soybean Meal: Immunological Properti	J. Agric. Food Chem.	59
Bioinformatics and the allergy assessment of agricultura	Regulatory Toxicology and Pharmaco	60
Nutritional equivalency evaluation of transgenic maize g	Poultry Science	90
Comparison of broiler performance and carcass yields w	Poultry Science	90
Bioinformatic analysis for allergenicity assessment of Ba	Food and Chemical Toxicology	49
Application of the threshold of toxicological concern (TT	Food and Chemical Toxicology	49
Allergenicity Assessment of Osmotin, a Pathogenesis-R	Journal of agricultural and food chemi	59
Are Apparent Negative Effects of Feeding GM MON810	British Journal of Nutrition	106
Haematology, blood biochemistry and tissue histopathol	Journal of Animal Physiology and Ani	95
Computational allergenicity prediction of transgenic prot	Immunopharmacology and Immunoto	33
Fate of Transgenic DNA from Orally Administered Bt MC	PLoS ONE	6
Analysis of Caecal Microbiota in Rats Fed with Genetica	Journal of Food Science	76
Effects of genetically modified T2A-1 rice on faecal micr	Journal of the Science of Food and A	91
Do genetically modified crops affect animal reproduction	Animal: An International Journal of An	5
A 90-day toxicology study of high-amylose transgenic ric	Food and chemical toxicology: an inte	49
High-amylose rice improves indices of animal health in n	Plant Biotechnology Journal	
Effect of feeding genetically modified Bt MON810 maize	Animal: An International Journal of An	6
Trans-generational effects of feeding genetically modifie	Journal of Animal Science	
Effects of Feeding Bt Maize to Sows during Gestation ar	PLoS ONE	7
High-throughput sequence-based analysis of the intestin	Applied and Environmental Microbiolc	78
The effect of feeding Bt MON810 maize to pigs for 110 d	PLoS ONE	7
Safety assessment of transgenic Bacillus thuringiensis ri	IUBMB Life	64
Health and nutritional status of Wistar rats following sub	Food and chemical toxicology: an inte	50
Application of scientific criteria to food allergens of public	Regulatory toxicology and pharmacol	64
Characterization of maize allergens - MON810 vs. its no	Journal of proteomics	75
The Regulatory Challenge of Food Allergens	Journal of agricultural and food chemistry	
Interpreting the biological relevance of bioinformatic ana	Regulatory Toxicology and Pharmaco	63
A 90-day subchronic feeding study of genetically modifie	Food and chemical toxicology: an inte	50
Preliminary safety assessment of a membrane-bound de	Food and Chemical Toxicology	50
In silico assessment of the potential allergenicity of trans	Food and Chemical Toxicology	50
Safety evaluation of genetically modified mustard (V4) s	GM crops & food	3
An investigation of horizontal transfer of feed introduced	BMC Research Notes	5
Possible consequences of the overlap between the CaM	GM crops & food	3
Subchronic feeding study of stacked trait genetically-mo	Food and chemical toxicology: an inte	50
The Stability and Degradation of Dietary DNA in the Gas	Critical Reviews in Food Science and	52
Long term toxicity of a Roundup herbicide and a Roundu	Food and Chemical Toxicology	
Assessment of the health impact of GM plant diets in lon	Food and Chemical Toxicology	50
Acute and 28-day repeated dose toxicology studies in m	Regulatory toxicology and pharmacol	62
Environmental Effects on Allergen Levels in Commercial	Frontiers in Plant Science	3
A 90-day safety study of genetically modified rice expres	Transgenic Research	21
Food Protein-Derived Bioactive Peptides: Production, Pr	Journal of Food Science	77
Conventional (MG-BR46 Conquista) and transgenic (BR	Nutrition and cancer	64
Effects of short-term feeding of Bt MON810 maize on gr	The British journal of nutrition	107
Effects of feeding Bt MON810 maize to pigs for 110 day	PLoS ONE	7
Crop Genome Plasticity and Its Relevance to Food and I	Plant Physiology	

Assessment of possible allergenicity of hypothetical ORF	Food and Chemical Toxicology	50
Exogenous plant MIR168a specifically targets mammalia	Cell Research	22
Analysis of plant-derived miRNAs in animal small RNA d	BMC Genomics	13
A three generation study with high-lysine transgenic rice	Food and chemical toxicology: an inte	50
A 90-day feeding study of glyphosate-tolerant maize with	Food and chemical toxicology: an inte	51C
Hidden allergens in foods and implications for labelling a	Current Allergy and Asthma Reports	12
Safety assessment of food and feed from biotechnology	Regulatory toxicology and pharmacol	66
Traceability of genetically modified organisms	Expert Rev Mol Diagn	2
Method development in relation to regulatory requiremer	Journal of AOAC International	85
Detection methods and performance criteria for genetica	Journal of AOAC International	85
Real-time quantitative polymerase chain reaction metho	Journal of AOAC International	85
Identity preservation of genetically modified organisms ir	Journal of AOAC International	85
DNA methods: critical review of innovative approaches	Journal of AOAC International	85
Analysis of Flour and Food Samples for cry9C from Bioe	Journal of Food Protection	65
Detection and quantification of transgenes in grains by n	Journal of agricultural and food chemi	50
Protein immunoassay methods for detection of biotech c	Journal of AOAC International	85
Detection of genetically modified crops and their derivati	Journal of AOAC International	85
Production of certified reference materials for the detecti	Journal of AOAC International	85
Analytical challenges: bridging the gap from regulation to	Journal of AOAC International	85
Detection of genetically modified organisms in foods by	Journal of AOAC International	85
State of the art and limitations of quantitative polymerase	Journal of AOAC International	85
The effect of processing parameters on DNA degradatio	European Food Research and Techn	217
Development of melting temperature-based SYBR Gree	Analytical Biochemistry	323
PCR technology for screening and quantification of gene	Analytical and Bioanalytical Chemistry	375
Present and future of surface plasmon resonance biosen	Analytical and Bioanalytical Chemistry	377
Reliable Detection and Identification of Genetically Modif	J. Agric. Food Chem.	51
Effect of Food Processing on the Fate of DNA with Rega	Systematic and Applied Microbiology	26
Quartz crystal microbalance (QCM) affinity biosensor for	Biosensors and Bioelectronics	18
Model studies on the detectability of genetically modified	Journal of Food Protection	66
A novel multiplex quantitative DNA array based PCR (M	Nucleic Acids Research	31
Multiplex polymerase chain reaction/membrane hybridiza	Journal of Biotechnology	105
Effect of food components and processing parameters o	Environmental Biosafety Research	3
Detection and Quantitation of Genetically Modified Maize	J. Agric. Food Chem.	52
COMMISSION RECOMMENDATION of 4 October 2004	Off J Eur Union	348
Real-time PCR: what relevance to plant studies?	Journal of Experimental Botany	55
Development of a Seven-Target Multiplex PCR for the S	J. Agric. Food Chem.	52
DNA separation by capillary electrophoresis with hydropl	Journal of Separation Science	27
Detection of transgenes in soybean via a polymerase ch	Analytical and Bioanalytical Chemistry	378
Development and Comparison of Four Real-Time Polym	J. Agric. Food Chem.	52
The modular analytical procedure and validation approa	Journal of AOAC International	87
Study of mixed Langmuir–Blodgett films of immunoglobu	Biosensors and Bioelectronics	20
Detection of genetically modified organisms by electroch	Biosensors and Bioelectronics	20
Detection and traceability of genetically modified organis	Food and Chemical Toxicology	42
Rapid analysis of genetically modified organisms by in-h	ELECTROPHORESIS	25
Suitability of real-time quantitative polymerase chain rea	Journal of AOAC International	87
Qualitative and Quantitative PCR Methods for Detection	J. Agric. Food Chem.	52
Cloned plasmid DNA fragments as calibrators for contro	Analytical and Bioanalytical Chemistry	378
Reliable GMO analysis	Analytical and Bioanalytical Chemistry	381
Evaluation of purification procedures of DNA from maize	Annali Di Chimica	94
Real-time polymerase chain reaction-based approach fo	Journal of AOAC International	87
Monitoring the presence and expression of transgenes in	Trends in Plant Science	10
Real-time polymerase chain reaction detection of cauliflo	Journal of AOAC International	88
Role of the "National Reference Centre for Genetically M	Veterinary Research Communications	29
Quantitative determination of Roundup Ready soybean (	Analytical and Bioanalytical Chemistry	383
Quantitation of 35S promoter in maize DNA extracts fron	Journal of AOAC International	88
Quantification of the 35S promoter in DNA extracts from	Journal of AOAC International	88
Methodological scheme for designing the monitoring of g	Environmental Monitoring and Assess	111
Quantitation of Transgenic Plant DNA in Leachate Wate	J. Agric. Food Chem.	53
Event-Specific Real-Time Detection and Quantification o	J. Agric. Food Chem.	53

Microchip capillary gel electrophoresis using programme	Journal of Chromatography. A	1083
DNA Extraction and Analysis from Processed Coffee Be	J. Agric. Food Chem.	53
Detection of Genetically Modified Organisms in Foreign-	Food Hygiene and Safety Science (Sl	46
Distortion of Genetically Modified Organism Quantificatic	J Agric Food Chem	53
Design of a DNA chip for detection of unknown genetica	Bioinformatics	21
Development of a Multiplex Polymerase Chain Reaction	J. Agric. Food Chem.	53
Multiplex polymerase chain reaction and ligation detectic	Analytical Biochemistry	346
Development of a peptide nucleic acid polymerase chair	Analytical Biochemistry	344
Bio-markers: traceability in food safety issues	Acta Biochimica Polonica	52
Event-Specific Plasmid Standards and Real-Time PCR I	J. Agric. Food Chem.	53
Application of Immunoaffinity Column as Cleanup Tool f	J. Agric. Food Chem.	53
Rapid and reliable detection and identification of GM eve	J Agric Food Chem	53
Identification and Quantification of Three Genetically Mo	J. Agric. Food Chem.	53
Qualitative and Quantitative PCR Methods for Event-spe	Transgenic Research	14
Applicability of the Quantification of Genetically Modified	J. Agric. Food Chem.	53
Detection of genetically modified DNA sequences in milk	International Journal of Hygiene and E	209
Equal Performance of TaqMan, MGB, Molecular Beacon	J. Agric. Food Chem.	54
Sources of uncertainty in the quantification of genetically	Transgenic Research	16
Critical points of DNA quantification by real-time PCR - e	BMC Biotechnology	6
In-house validation and quality control of real-time PCR	Developments in Biologicals	126
Quantitative-competitive polymerase chain reaction cou	ELECTROPHORESIS	27
Development of an innovative immunoassay for CP4EP	Food Additives and Contaminants	23
Surface plasmon resonance for detection of genetically	Journal of AOAC International	89
Kernel lot distribution assessment (KeLDA): a study on t	European Food Research and Techn	224
Immunoassay as an Analytical Tool in Agricultural Biotec	Journal of AOAC International	89
Effect of heat and pressure processing on DNA fragmen	Food Additives and Contaminants	23
Coherence between Legal Requirements and Approach	J. Agric. Food Chem.	54
Nanoparticle-based DNA biosensor for visual detection	Biosensors and Bioelectronics	21
Interlaboratory transfer of a real-time polymerase chain	Journal of AOAC International	89
Qualitative and Quantitative Polymerase Chain Reaction	J. Agric. Food Chem.	54
A Microarray-based Detection System for Genetically Mc	Plant Molecular Biology	61
A new PCR-CGE (size and color) method for simultaneo	ELECTROPHORESIS	27
QCM DNA-sensor for GMOs detection	Sensors and Actuators B: Chemical	118
Assessment of Real-time PCR Based Methods for Quan	Transgenic Research	15
The Occurrence of Antibiotic Resistance Genes in Taq F	Biotechnology Letters	28
Development and validation of a sensitive and fast chem	Analytical and Bioanalytical Chemistry	384
Novel Reference Gene, PKABA1, Used in a Duplex Rea	J. Agric. Food Chem.	54
Quantification of Genetically Modified Soybeans Using a	Bioscience, Biotechnology, and Bioch	70
Rapid Quantification Methods for Genetically Modified M	Bioscience, Biotechnology, and Bioch	70
Screening genetically modified organisms using multiple	Biosensors and Bioelectronics	22
Event-specific qualitative and quantitative polymerase ch	J Agric Food Chem	54
Random amplified polymorphic DNA analysis of genetic	Journal of Biotechnology	127
Indicated Detection of Two Unapproved Transgenic Rice	J. Agric. Food Chem.	55
Qualitative and Quantitative Polymerase Chain Reaction	J. Agric. Food Chem.	55
Comparative Evaluation of Different DNA Extraction Pro	Biotechnology Progress	23
A Strategy for Designing Multi-Taxa Specific Reference	J. Agric. Food Chem.	55
Toward Metrological Traceability for DNA Fragment Rati	J. Agric. Food Chem.	55
Accumulation of amplified target DNAs using thiol/biotin	Science and Technology of Advanced	8
Development of a Real-Time PCR Method Based on Du	J. Agric. Food Chem.	55
EU regulations on the traceability and detection of GMO	CAB Reviews	2
First Application of a Microsphere-Based Immunoassay	J. Agric. Food Chem.	55
Characterization and differentiation of diverse transgenic	ELECTROPHORESIS	28
Microarray Method for the Screening of EU Approved GI	OPOCE	
Comparison of Real-Time PCR Detection Chemistries a	J. Agric. Food Chem.	55
Model for tuning GMO detection in seed and grain	Nat Biotech	25
Mass spectrometric detection of CP4 EPSPS in genetica	Rapid Communications in Mass Spec	21
Interlaboratory trial validation of an event-specific qualita	Journal of AOAC International	90
Characterization of genetically modified maize in weakly	Journal of AOAC International	90
Identification of PCR-Amplified Genetically Modified Org	J. Agric. Food Chem.	55

A simple capillary gel electrophoresis approach for efficie	Journal of Separation Science	30
Detection and characterization of recombinant DNA expı	Analytical and Bioanalytical Chemistry	390
Detection and characterization of cry1Ac transgene cons	Journal of AOAC International	90
Calibration-curve-free quantitative PCR: A quantitative n	Analytical Biochemistry	369
Detection of Genetically Modified Organisms in Food: Cc	Veterinary Research Communications	31
GMO quantification in processed food and feed	Nat Biotech	25
Effect of storage and processing on plasmid, yeast and ţ	Journal of Biotechnology	128
Event-Specific Qualitative and Quantitative PCR Detecti	J. Agric. Food Chem.	55
Event-Specific Detection of Seven Genetically Modified S	J. Agric. Food Chem.	55
Specific Detection of Soybean Residues in Processed F	Bioscience, Biotechnology, and Bioch	71
Event-specific qualitative and quantitative PCR detectior	Plant Cell Reports	26
Calculation of measurement uncertainty in quantitative a	Journal of AOAC International	90
Impact of genetic structures on haploid genome-based q	Transgenic Research	17
Sampling and Modeling for the Quantification of Adventit	J. Agric. Food Chem.	56
Discrimination between Nongenetically Modified (Non-G	J. Agric. Food Chem.	56
A Single Nucleotide Polymorphism (SNP839) in the adh	J. Agric. Food Chem.	56
Comparison of different real-time PCR chemistries and t	BMC Biotechnology	8
Discrimination of transgenic and conventional soybean s	Applied Spectroscopy	62
Detection of nonauthorized genetically modified organisr	Analytical Biochemistry	376
GMDD: a database of GMO detection methods	BMC Bioinformatics	9
Advances in molecular techniques for the detection and	Analytical and Bioanalytical Chemistry	392
Simultaneous Confirmatory Analysis of Different Transg	J. Agric. Food Chem.	56
Using multiple PCR and CE with chemiluminescence de	ELECTROPHORESIS	29
Real-Time PCR Method Using Capturing Oligo-Immobili	Bioscience, Biotechnology, and Bioch	72
Validation of the performance of a GMO multiplex screer	European Food Research and Techn	227
Methods for detection of GMOs in food and feed	Analytical and Bioanalytical Chemistry	392
New trends in bioanalytical tools for the detection of gen	Analytical and Bioanalytical Chemistry	392
NAIMA: target amplification strategy allowing quantitative	Nucleic Acids Research	36
Development of Event-Specific Quantitation Method for (	Food Hygiene and Safety Science (Sł	49
Optimised padlock probe ligation and microarray detecti	BMC Genomics	9
Real-time and conventional PCR detection of Liberty Lin	Analytical and Bioanalytical Chemistry	392
Detection of Genetically Modified Canola Using Multiple	J. Agric. Food Chem.	56
Simultaneous Detection of Eight Genetically Modified Ma	J. Agric. Food Chem.	56
Application of DNA Hybridization Biosensor as a Screeni	Sensors	8
Event-specific qualitative and quantitative polymerase ch	Journal of AOAC International	91
Qualitative and Quantitative Event-Specific PCR Detecti	J. Agric. Food Chem.	56
A novel universal real-time PCR system using the attach	BMC Molecular Biology	9
International Collaborative Study of the Endogenous Ref	J. Agric. Food Chem.	56
Development of One Novel Multiple-Target Plasmid for D	J. Agric. Food Chem.	56
Detection of Genetically Modified Crops by Combination	Biomedical and Environmental Scienc	21
PCR-Free Quantitative Detection of Genetically Modified	Anal. Chem.	80
Electrochemical genosensor for the rapid detection of GI	Analyst	134
A Screening Method for the Detection of the 35S Promot	Biological & Pharmaceutical Bulletin	32
Testing for genetically modified organisms (GMOs): Pas	Biotechnology Advances	27
Maize Authentication: Quality Control Methods and Multi	Critical Reviews in Food Science and	49
Real-time quantification of wild-type contaminants in glyp	BMC Biotechnology	9
Fuzzy-logic based strategy for validation of multiplex me	Transgenic Research	19
A theoretical introduction to "Combinatory SYBR®Green	Analytical and Bioanalytical Chemistry	396
Absolute quantification of genetically modified MON810 i	Analytical and Bioanalytical Chemistry	396
Influence of DNA extraction methods, PCR inhibitors and	Analytical and Bioanalytical Chemistry	396
Effects of DNA extraction and purification methods on re	Journal of AOAC International	92
NAIMA as a solution for future GMO diagnostics challen	Analytical and Bioanalytical Chemistry	396
Development of a qualitative, multiplex real-time PCR kit	Analytical and Bioanalytical Chemistry	396
A preamplification approach to GMO detection in proces	Analytical and Bioanalytical Chemistry	396
See what you eat—broad GMO screening with microarra	Analytical and Bioanalytical Chemistry	396
Sensitive and highly specific quantitative real-time PCR i	Analytical and Bioanalytical Chemistry	393
Characterization of the Exogenous Insert and Developm	J. Agric. Food Chem.	57
Applicability of the Chymopapain Gene Used as Endoge	J. Agric. Food Chem.	57
Capillary Electrophoresis with Electrochemiluminescent	Anal. Chem.	81

A PCR-microarray method for the screening of genetical	European Food Research and Techn	228
Optical Detection of Specific Genes for Genetically Modi	Bioscience, Biotechnology, and Bioch	73
International Collaborative Study of the Endogenous Rel	J. Agric. Food Chem.	57
Evaluation of modified PCR quantitation of genetically m	Journal of AOAC International	92
Detection of genetically modified organisms (GMOs) usi	BMC Biotechnology	9
Simplex and duplex polymerase chain reaction analysis	Journal of AOAC International	92
Rapid detection of genetically modified organisms on a c	Analytical Biochemistry	385
Safety Assessment and Detection Method of Genetically	J. Agric. Food Chem.	57
Sensitive and Rapid Detection of Genetic Modified Soyb	Bioscience, Biotechnology, and Bioch	73
Simultaneous Detection of Recombinant DNA Segments	J. Agric. Food Chem.	57
Validity Assessment of the Detection Method of Maize E	J. Agric. Food Chem.	57
Multiplex polymerase chain reaction-capillary gel electro	Journal of AOAC International	92
GMOtrack: generator of cost-effective GMO testing strat	Journal of AOAC International	92
Evaluation of stable isotope labelling strategies for the q	Analytica Chimica Acta	634
Investigation of residual DNAs in sugar from sugar beet	Food Hygiene and Safety Science (Sf	50
Development of Quantitative Duplex Real-Time PCR Me	Food Hygiene and Safety Science (Sf	50
Multiplex PCR-Based Simultaneous Amplification of Sele	J. Agric. Food Chem.	57
Detection and identification of multiple genetically modifi	Analytical and Bioanalytical Chemistry	396
Molecular toolbox for the identification of unknown genet	Analytical and Bioanalytical Chemistry	396
Knowledge-technology-based discovery of unauthorized	Analytical and Bioanalytical Chemistry	396
Increased efficacy for in-house validation of real-time PC	Analytical and Bioanalytical Chemistry	396
Rapid amplification of genetically modified organisms us	Analytical and Bioanalytical Chemistry	394
Towards future reference systems for GM analysis	Analytical and Bioanalytical Chemistry	396
A practical approach to screen for authorised and unautl	Analytical and Bioanalytical Chemistry	396
Genetically modified plants for non-food or non-feed pur	Food and Chemical Toxicology	48
Identification of transgenic foods using NIR spectroscop	Spectrochimica Acta Part A: Molecula	75
Validation of a newly developed hexaplex real-time PCR	Analytical and Bioanalytical Chemistry	396
Detection of Six Genetically Modified Maize Lines Using	J. Agric. Food Chem.	58
Testing the interaction between analytical modules: an e	BMC Biotechnology	10
Comparison of nine different real-time PCR chemistries	Analytical and Bioanalytical Chemistry	396
Design of multiplex calibrant plasmids, their use in GMO	Analytical and Bioanalytical Chemistry	396
Monitoring of Bt11 and Bt176 genetically modified maize	Journal of the Science of Food and A	90
Effect of food processing on plant DNA degradation and	Analytical and Bioanalytical Chemistry	396
Development and in-house validation of the event-specif	Journal of the Science of Food and A	90
An Event-Specific DNA Microarray To Identify Geneticall	J. Agric. Food Chem.	58
Tendency for interlaboratory precision in the GMO analy	Journal of AOAC International	93
Multi-wall carbon nanotubes (MWCNTs)-doped polypyrr	Talanta	80
Use of pJANUS™-02-001 as a calibrator plasmid for Ro	Analytical and Bioanalytical Chemistry	396
Evaluation of the Impacts of Different Nuclear DNA Cont	J. Agric. Food Chem.	58
Development of Multiplex PCR Method for Simultaneous	Food Hygiene and Safety Science (Sf	51
Evaluation of the reliability of maize reference assays for	Analytical and Bioanalytical Chemistry	396
Yield and amplificability of different DNA extraction proce	Food Control	21
New approaches in GMO detection	Analytical and Bioanalytical Chemistry	396
Semiconductor quantum dots for multiplexed bio-detecti	Critical Reviews in Oncology/Hematol	74
Detection of Cry1Ab toxin in the leaves of MON 810 tran	Analytical and Bioanalytical Chemistry	396
Establishment and Evaluation of Event-Specific Quantita	Food Hygiene and Safety Science (Sf	51
Evaluation of Four Genes in Rice for Their Suitability As	J. Agric. Food Chem.	58
A Novel Detection System for the Genetically Modified C	Anal. Chem.	82
Individual Detection of Genetically Modified Maize Variet	J. Agric. Food Chem.	56
Interlaboratory study of DNA extraction from multiple gro	Journal of AOAC International	94
A Real-Time Quantitative PCR Detection Method Specifi	J. Agric. Food Chem.	54
Sensitive detection of soy (Glycine max) by real-time pol	Journal of AOAC International	94
A Microarray Platform for Parallel Detection of Five Tran	J. Agric. Food Chem.	53
Development of a Certified Reference Material for Gene	J. Agric. Food Chem.	55
Applicability of Three Alternative Instruments for Food A	Biotechnology Research International	2011
Monitoring the presence of genetically modified food on	Collegium antropologicum	35
A High-Throughput Multiplex Method Adapted for GMO I	J. Agric. Food Chem.	56
Development of a Real-Time PCR Method for the Differe	J. Agric. Food Chem.	56
Toward Metrological Traceability for DNA Fragment Rati	J. Agric. Food Chem.	55

Degradation of Endogenous and Exogenous Genes of R	J. Agric. Food Chem.	53
Toward Metrological Traceability for DNA Fragment Rati	J. Agric. Food Chem.	55
Identification of Genetically Modified Potato (Solanum tu	J. Agric. Food Chem.	53
Development and validation of real-time PCR screening	Analytical and Bioanalytical Chemistry	400
Quantitation of Transgenic Bt Event-176 Maize Using Dc	Anal. Chem.	76
Detection of Genetically Modified Organisms in Foods b	Critical Reviews in Food Science and	44
Detection of Genetically Modified Maize by the Polymera	J. Agric. Food Chem.	50
Development of a Peptide Nucleic Acid Array Platform fc	J. Agric. Food Chem.	53
Assessment of Primer/Template Mismatch Effects on Re	J. Agric. Food Chem.	57
Collaborative Trial Validation Studies of Real-Time PCR	J. Agric. Food Chem.	57
Construction of a standard reference plasmid for detecti	Applied biochemistry and biotechnolo	165
MPIC: A High-Throughput Analytical Method for Multiple	Anal. Chem.	83
Real-Time Polymerase Chain Reaction Based Assays fc	J. Agric. Food Chem.	53
Interlaboratory Transfer of a PCR Multiplex Method for S	J. Agric. Food Chem.	53
Evaluation of Extraction Methodologies for Corn Kernel (	J. Agric. Food Chem.	51
Detection of Genetically Modified Maize MON810 and NI	J. Agric. Food Chem.	52
One-PCR-tube approach for in situ DNA isolation and de	Analyst	136
Development of Taxon-Specific Sequences of Common	J. Agric. Food Chem.	53
Qualitative PCR method for Roundup Ready soybean: ir	Journal of AOAC International	94
Validated Method for Quantification of Gentically Modifie	J. Agric. Food Chem.	54
Detection Methods for Biotech Cotton MON 15985 and M	J. Agric. Food Chem.	55
Simplex and Duplex Event-Specific Analytical Methods f	J. Agric. Food Chem.	57
Establishment and application of event-specific polymer	Journal of agricultural and food chemi	59
Microbead-assisted PDA sensor for the detection of gen	Analytical and Bioanalytical Chemistry	400
Development and In-House Validation of the Event-Spec	J. Agric. Food Chem.	57
Real-Time PCR Array as a Universal Platform for the De	J. Agric. Food Chem.	57
Practicable Group Testing Method to Evaluate Weight/W	J. Agric. Food Chem.	59
High-Throughput Double Quantitative Competitive Polyn	Anal. Chem.	77
Distortion of Genetically Modified Organism Quantificatic	J. Agric. Food Chem.	53
Use of Quantitative Real-Time PCR To Estimate Maize E	J. Agric. Food Chem.	55
Finding the Joker among the Maize Endogenous Refere	J. Agric. Food Chem.	57
Qualitative and Quantitative Evaluation of the Genomic I	J. Agric. Food Chem.	52
Detection and Quantification of Roundup Ready Soy in F	J. Agric. Food Chem.	52
Isolation of genomic DNA from defatted oil seed residue	Genetics and Molecular Research	10
Detection and Quantification of Genetically Modified Org	J. Agric. Food Chem.	56
Development of a Screening Method for Genetically Moc	J. Agric. Food Chem.	56
Degradation of transgene DNA in genetically modified he	Food and Chemical Toxicology	
Development and Evaluation of Event-Specific Quantitat	Food Hygiene and Safety Science (St	52
Interlaboratory Validation of Quantitative Duplex Real-Ti	Food Hygiene and Safety Science (St	52
Quantification of Genetically Modified Soybean by Quen	J. Agric. Food Chem.	53
Optimization of a multiplex PCR assay for detecting tran	Applied biochemistry and biotechnolo	165
DNA Detection Using Functionalized Conducting Polyme	Bioconjugation Protocols	751
DNA Content in Embryo and Endosperm of Maize Kerne	J. Agric. Food Chem.	52
European ruling raises specter of mandatory GM pollen	Nat Biotech	29
Construction of a reference plasmid molecule containing	Applied Microbiology and Biotechnolo	90
Event-Specific Detection of Seven Genetically Modified S	J. Agric. Food Chem.	55
Event-Specific Quantitative Detection of Nine Genetically	J. Agric. Food Chem.	55
Identification and Quantification of Three Genetically Mo	J. Agric. Food Chem.	53
Event Specific Qualitative and Quantitative Polymerase (	J. Agric. Food Chem.	53
Comparative Studies of the Quantification of Genetically	J. Agric. Food Chem.	53
Applicability of the Quantification of Genetically Modified	J. Agric. Food Chem.	53
Universal Primer-Multiplex-Polymerase Chain Reaction (	J. Agric. Food Chem.	59
The Development and Standardization of Testing Metho	Journal of integrative plant biology	53
High Sensitive Detection of Cry1Ab Protein Using a Qua	J. Agric. Food Chem.	59
Quantification and identification of genetically modified n	Shokuhin eiseigaku zasshi. Journal of	53
Detection of genetically modified DNA in fresh and proce	GM crops & food	3
Evaluation of plasmid and genomic DNA calibrants used	Analytical and Bioanalytical Chemistry	404
Development of real-time PCR method for the detection	Plant cell reports	
Feasibility of conventional and Roundup Ready® soybea	Food chemistry	134

Detection of airborne genetically modified maize pollen b	Molecular ecology resources	12
Detecting un-authorized genetically modified organisms	Biotechnology Advances	
Concordance Study: Methods of Quantifying Corn and S	Journal of agricultural and food chemistry	
Chitosan functionalized magnetic particle-assisted detec	Analytical Biochemistry	420
GMO detection using a bioluminescent real time reporte	BMC Biotechnology	12
Event-specific qualitative and quantitative PCR detectior	Genetics and molecular research: GM	11
Development and Validation of Event-Specific Quantitati	Shokuhin eiseigaku zasshi. Journal of	53
Comprehensive GMO detection using real-time PCR arr	Journal of AOAC International	95
Applicability of plasmid calibrant pTC1507 in quantificati	Journal of agricultural and food chemi	60
Multiplex, construct-specific, and real-time PCR-based a	Journal of AOAC International	95
Comparison of three DNA extraction methods for feed pr	Journal of agricultural and food chemi	60
Construction of a reference plasmid containing ten targe	Plasmid	
Presence of CP4-EPSPS Component in Roundup Read	International journal of molecular scie	13
The combination of quantitative PCR and western blot d	Journal of Food Science	77
A novel universal primer-multiplex-PCR method with sec	PLoS ONE	7
Development of event-specific PCR detection methods f	Journal of the science of food and agriculture	
Application of a qualitative and quantitative real-time pol	Food chemistry	136

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