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December 16, 2014

Honorable Mayor Seiler and Fort Lauderdale City Commission
c/o Ms. Maxine Singh
8th Floor City Hall
100 North Andrews Avenue
Fort Lauderdale, FL 33301

To the Honorable Mayor and members of the Fort Lauderdale City Commission:

The proposed GMO-labeling resolution before the city commission seems innocuous on its face, but could have vast unintended consequences. Because of its potential to negatively impact consumers, its lack of any corresponding benefit and misleading statements, we urge you to oppose this resolution.

I serve as the Director of State Affairs for the Grocery Manufacturers Association (GMA), an association representing 300 leading food, beverage and consumer product companies.

Genetically modified (GM) crops are safe for human consumption and pose no threat to the environment. Foods with GM ingredients make up over 80% of our food supply. GM crops have been commercially produced for 20 years, and every credible study, as well as numerous U.S. and global food safety agencies have found that GM ingredients are safe and that there are no negative health effects associated with their use. Consumers currently have the option of buying certified organic products if they choose to avoid GM ingredients. But mandatory labeling forces all farmers, their customers, manufacturers, distributors, and retailers to segregate ingredients all the way through the supply chain, even when they are not seeking to recoup those costs by marketing their products as certified organic. Those who choose to pay more for products that carry this premium can make that choice today, but mandatory GM labeling could force everyone to pay higher prices for food. A Cornell University study published in May found that state-based GM labeling initiatives would cost the average family of four an additional \$500 per year in grocery costs.

A 2014 study published in the Journal of Animal Science reviewed 29 years of data from both before and after the introduction of genetically engineered animal feed. The data represented more than 100 billion animals covering a period from before 1996 when animal feed was 100% non-GM, and after its introduction when GM animal feed adoption quickly climbed to over 90%. The study found that GM feed is safe and nutritionally equivalent to non-GM feed, with no indication of any unusual trends in the health of animals since 1996 when GM crops were first harvested. In addition, Italian scientists recently analyzed nearly 1800 scientific studies on

GM crops, and found overwhelming scientific consensus that there are no harmful health or environmental effects from GM production or consumption.

The proposed resolution's findings about other states' legislation state that three states have passed laws requiring labeling. Connecticut and Maine did pass legislation mandating GMO-labeling, but the laws included trigger language that required multiple northeastern states covering a population of 20 million to pass similar requirements for the laws to take effect. Neither state's law has met the required threshold. Vermont recently passed similar legislation without trigger language and is currently involved in litigation to defend the law, which has also not taken effect. In four states, activists have proposed ballot initiatives requiring GMO-labeling, all of which have been rejected by voters. As consumers learn about the widespread misinformation on this issue, increased food costs, and lack of supporting scientific evidence, they have consistently voted against GMO-labeling. Over 40 countries currently import American GM crops and have independently evaluated the science supporting their safety. Many of the most influential regulatory agencies and organizations that study the safety of the food supply, including the U.S. Food & Drug Administration, the American Medical Association, the World Health Organization, Health Canada, the U.S. Department of Agriculture and the National Academy of Sciences, have found genetically modified food ingredients are safe and there are no negative health effects associated with their use.

Stigmatizing safe crops has the potential to reduce investment in this necessary technology. Currently available GM crops are not limited to corn and soybeans but include beets, alfalfa, cotton, and papaya. GM technology in some cases protects the crop from diseases and certain types of pests. A potential crop saving use of GM technology is right in Florida's own backyard. Orange greening disease is wiping out the orange crop. One use of GM technology would combine a gene from the plant to date that is naturally resistant to the disease (spinach) with the orange tree. This solution would directly benefit Florida's economy.

In order to be constructive, the resolution should be altered to support a federal solution. A solution of this type is currently available in H.R. 4432. This congressional resolution would do four things; create consistency by reinstating the Food and Drug Administration's authority to regulate food and beverage labeling, reduce consumer confusion by creating voluntary labeling standards for the presence of or absence of GM food ingredients, require the safety review of all GM products coming on to the market (which is technically currently voluntary although every GM crop in use has gone through this review) and define the term 'natural.'

I ask that you oppose the proposed GMO-labeling resolution because the policy it is supporting would not benefit Florida citizens, and instead create consumer confusion, increase food costs, reduce consumer choice for Florida families and stigmatize the Florida orange.

Very Truly Yours,

Kelsey Johnson
Director, State Affairs
GMA