

Institute of Food Technologists 525 W. Van Buren Street., Suite 1000 Chicago, IL 60607-3830 USA +1.312.782.8424 +1.312.782.8348 Fax **ift.org** 

November 16, 2017

Dockets Management Staff (HFA-305) Food and Drug Administration 5630 Fishers Lane, Rm. 1061 Rockville, MD 20852

Filed electronically at <a href="https://www.regulations.gov">https://www.regulations.gov</a>.

Re: Docket No. FDA-2017-N-5991 for "Agricultural Biotechnology Education and Outreach Initiative; Public Meetings; Request for Comments."

Dear Sir or Madam:

The Institute of Food Technologists (IFT) is a global organization of more than 17,000 individual members from over 100 countries committed to advancing the science of food. Since 1939, IFT has brought together the brightest minds in food science, technology and related professions from academia, government, and industry to solve the world's greatest food challenges. Our organization works to ensure that our members have the resources they need to learn, grow, and advance the science of food as the population and the world evolve. We believe that science is essential to ensuring a global food supply that is sustainable, safe, nutritious, and accessible to all.

IFT appreciates the opportunity to comment on the Food and Drug Administration's (FDA) "Agricultural Biotechnology Education and Outreach Initiative." IFT commends FDA on its efforts to collaborate with public and private organizations to inform, educate, and raise awareness of the environmental, nutritional, food safety, economic, and humanitarian impacts of agricultural biotechnology. Science-based educational outreach is important to help empower consumers to make informed decisions about the food they purchase and consume.

IFT has several resources addressing biotechnology, which may be of value to the agency with Question 1—"What are the specific topics, questions, or other information that consumers would find most useful, and why?"—and other questions, and for developing a comprehensive framework for consumer education on agricultural biotechnology.

#### IFT resources include:

# • Biotechnology, Genetic Engineering, and "GMOs:" Why all the Controversy?

This Food Facts document provides an overview, based on information gathered from credible, fact-based sources, and addresses key questions to clarify this issue for consumers. To learn more, visit <a href="http://www.ift.org/Knowledge-Center/Learn-About-Food-Science/Food-Facts/Biotechnology-Genetic-Engineering-GMOS.aspx">http://www.ift.org/Knowledge-Center/Learn-About-Food-Science/Food-Facts/Biotechnology-Genetic-Engineering-GMOS.aspx</a>.

#### Food Evolution

This documentary film explores global food-related challenges, the critical role of science and technology in addressing them, and public perceptions and misperceptions about the science of food and technology. Although commissioned and funded by IFT, the film's director, Academy Award nominee, Scott Kennedy, and his partner on this project, Trace Sheehan, established the vision, maintained full creative control in making the film, and produced the final cut of the film. Food Evolution focuses on the GMO debate because the director found it to be emblematic of the public misunderstanding about the science of food and food sustainability. The film is thought provoking, and is contributing to a more informed understanding of the critical role of sound science in the global food system.

To learn more, visit <u>foodevolutionmovie.com</u>, and <u>https://foodevolutionmovie.com/about/the-film/</u>. The film is now available via several on demand video channels, including <u>Hulu</u>, <u>iTunes</u>, Amazon, and YouTube.

# FutureFood 2050

Initiated by IFT, this website provides a wide variety of feature articles about food issues, opportunities, and science-based solutions. Scientific experts along with a wider community of innovators and citizens from around the world provided balanced reporting and bring to light the facts behind the issues, such as biotechnology. To learn more, visit <a href="https://futurefood2050.com/">https://futurefood2050.com/</a>.

## • IFT Expert Report on Biotechnology and Foods

The report and its accompanying documents provide science-based information about biotechnology to multiple audiences, for example, IFT members, journalists, and the public. The report addresses three main topics —safety, labeling, and benefits and concerns. The full report and accompanying documents, such as background information, one page

summaries on the three main topics, and FAQs are available at <a href="http://www.ift.org/Knowledge-Center/Read-IFT-Publications/Science-Reports/Expert-Reports/Biotechnology-and-Foods.aspx">http://www.ift.org/Knowledge-Center/Read-IFT-Publications/Science-Reports/Expert-Reports/Biotechnology-and-Foods.aspx</a>.

## • IFT publications

IFT's peer-reviewed scientific journals and magazine (see examples below) include publications related to biotechnology.

- o *Journal of Food Science*, <a href="http://u7.ift.org/knowledge-center/read-ift-publications/journal-of-food-science.aspx">http://u7.ift.org/knowledge-center/read-ift-publications/journal-of-food-science.aspx</a>.
- Comprehensive Reviews in Food Science and Food Safety, <a href="http://u7.ift.org/knowledge-center/read-ift-publications/comprehensive-reviews-in-food-science-and-food-safety.aspx">http://u7.ift.org/knowledge-center/read-ift-publications/comprehensive-reviews-in-food-science-and-food-safety.aspx</a>.
- Food Technology Magazine, <a href="http://u7.ift.org/food-technology.aspx">http://u7.ift.org/food-technology.aspx</a>.

## • IFT Connect

The Biotechnology division of IFT includes members with expertise in this area, who could assist with identification of educational goals, messaging, and dissemination strategies for FDA's Agricultural Biotechnology Education and Outreach Initiative. IFT will be glad to connect the agency with experts. Visit IFT Connect at <a href="http://www.ift.org/community.aspx">http://www.ift.org/community.aspx</a>.

IFT appreciates the opportunity to provide comments on this important initiative. We hope that the aforementioned resources will be helpful in addressing the specific questions and in the development of the education and outreach initiative. We thank you in advance for your consideration of our comments on "Agricultural Biotechnology Education and Outreach Initiative." Please contact Farida Mohamedshah, Director, Food Health & Nutrition, (<a href="mailto:fmohamedshah@ift.org">fmohamedshah@ift.org</a>; 202-330-4986) if IFT may provide further assistance.

Sincerely,

Christie Tarantino-Dean, FASAE, CAE

Chief Executive Officer

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