

Gerber Products Co, 445 State Street, Fremont, MI 49456

March 19, 2001

Dockets Management Branch, (HFA-305)
Food and Drug Administration, Room 1061
5630 Fishers Lane
Rockville, MD 20852

5324 '01 MAR 19 P3:48

Response of Gerber Products Company to:

[Docket Number: 00D-1598], Draft Guidance for Industry: Voluntary Labeling indicating Whether Foods Have or Have Not Been Developed Using Bioengineering,
66 Federal Register 4839, January 18, 2001

Dear Sir or Madam:

Attached is an unsigned copy of the comments of the Gerber Products Company to the proposed FDA Guidance for Industry, specified above, about the labeling of food relative to their content of ingredients obtained from bioengineered crops.

Please accept this pending the arrival of a signed copy in two days, which is being sent by express delivery.

Sincerely,

Kathleen C. Reidy, Dr. P.H., R.D.
Director - Regulatory Affairs

Nicholas W. Hether, Ph.D.
Director - Product Safety

00D_1598

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Dear Sir or Madam:

Gerber Products Company (Gerber) is a leading manufacturer of infant and baby foods with over \$1 billion in annual sales and over 70% share of the baby food market in the United States. Honoring its commitment to help parents raise happy, healthy babies, Gerber maintains extremely high quality standards. This includes the stringent requirement for factual and non-misleading information Gerber provides to parents about good nutrition for their children. As a result Gerber has the highest level of trust of any brand in the US'. Gerber is committed to providing useful, helpful and accurate information to consumers on issues such as agricultural biotechnology. It is with this commitment along with our expertise in consumer communication that we provide comments to FDA on the industry guidance document about labeling of foods developed using bioengineering.

Gerber appreciates the opportunity to participate in this rulemaking and commends the FDA for their efforts in this area.

Labeling for the Absence of Biotechnology Derived Ingredients

FDA outlines, in some detail, guidance for the use of terminology about the absence of biotechnology derived ingredients in a food product. FDA asserts that terms such as "Genetically Modified", "GMO" and "GMO-Free" among others would be misleading to consumers because they imply conditions about the food that are fundamentally not correct. The guidance is also based on information about the lack of consumer understanding of this terminology and therefore, the great potential for such terms to be misleading.

Gerber agrees with FDA and commends FDA for providing clear guidance on this topic, that will result in better information for consumers.

Labeling for the Absence of the Use of Ingredients from Bioengineered sources

FDA indicates that descriptions of the process for obtaining foods from non-bioengineered sources would be appropriate as long as they did not suggest "zero" presence. In the context of describing why the use of the term "free" is misleading FDA indicates that it "...does not have information with which to establish a threshold level of bioengineered constituents of ingredients in foods for the statement 'free of

¹ Advertising Age, 10/5/98, "WPP brand study ranks Gerber 1st in U.S. market"

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