

To: Eric S. Sachs[eric.s.sachs@monsanto.com]; VICINI, JOHN L (AG/1000)[john.l.vicini@monsanto.com]; GLICK, HARVEY L [AG/5340] (harvey.l.glick@monsanto.com)[harvey.l.glick@monsanto.com]
From: Rick Goodman
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[Biosafety Evaluation and Regulation GM Crops Goodman 16 Oct Final corrected.pdf](#)

Eric, John and Harvey,

I have not been following the GMO food labeling campaigns in OR & CO, but have thought even more about it since being in China again and hearing the same mantra.... “We want the choice, we want the right to know”.... as a big deal in China.

Yesterday Joe Baumert, Steve Taylor and I were involved in discussions about research at UNL to evaluate and validate cleaning methods for food lines for something truly harmful, allergens, like peanuts, soybeans etc., but during the two hour meeting talking about a potential Alliance for Food group of faculty members I sat thinking about segregation of commodities, especially corn, through storage, shipping, milling, distribution.... And where much of the real costs would come if / when, labeling laws are passed and if some or many food companies decide to do “non-GMO” food to protect (or grow) their market share.

After the meeting I spoke with Joe Baumert (Co-director of FARRP, along with Steve Taylor), about cleaning milling lines and facilities like that if there is a need to segregate. They have far more experience dealing with food sanitation that I and they have more knowledge about processing.

I am sure you have thought about it, but what a nightmare when you think about segregation and cleaning milling operations, baking. The baking industry is already one of the most difficult to clean for potential allergen cross-contact. And that is for things that cause some consumers disease. Things that are intentional ingredients added to foods in some products, but not others. Segregation then is about keeping peanuts, almonds or soybeans out of cakes, cookies etc., that are not supposed to have them. Not about segregating shipments of the same commodity that can only be differentiated by PCR or possibly by lateral flow strips.... At the level needed to be below “thresholds” of detection if they are required. The cleaning the equipment when only dry cleaning methods are allowed....at efficiencies that would allow product segregation would be huge.

It is not clear to me how to communicate those processes necessary to control “GM”/“non-GM” and the associated costs as the most important costs that would be added if there is mandatory labeling. The costs of “printing labels” is certainly trivial as Greenpeace and others portray it and I can understand how the average consumer would wonder what additional costs could be involved. They don’t know the food supply system.

Are those concepts and ideas already in ads to educate consumers/voters?

If not, while it is too late to make an impact with those messages for the November elections, it may be worth considering an educational campaign on a global scale for educating the public about the complexity of our food supplies, processing and final food product manufacture (as well as label QC) can be portrayed visually in simple ways and might help consumers especially if they are tied to the contrasting potential risks: allergens, known risks from different sources, vs. commodity crops that are tested for safety and have no evidence of harm.

It would seem important to convey those points as well (or more important to do so), to the Senate, House and in China the key leaders.

I certainly hope the labeling campaigns fail and that the need for expending huge amounts on campaigns fall. It would seem so much better to be able to spend the money on research, and for food companies to be able to spend it on improving allergen controls.

I have attached a PDF of my final version of the paper to the Journal of Huazhong Agricultural University...that should soon post on their web.

It should end up in Vol 33, issue 6, but I don't know page numbers.

This is a slightly cleaned up version of the one that was published in the meeting handout.

I don't know if the messages are all what you would want to see out there, but maybe some of it is useful, if it is read by anyone beyond the few that might see it in that journal.

Rick

Richard E Goodman, PhD FAAAAI

Research Professor

Food Allergy Research and Resource Program

Dept. of Food Science & Technology

University of Nebraska—Lincoln

143 Food Industry Complex

Lincoln, NE 68583-0955

USA

www.allergenonline.org

rgoodman2@unl.edu

Office: +1(402)472-0452

RG-000037-000002

Mobile: +1(402)417-5549