

287 Clayton Avenue  
Asheville, NC 28806

0351 March 8, 2001  
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FDA Commissioner  
Dockets Management Branch (HFA 305)  
Food and Drug Administration  
5630 Fisher's Lane, rm. 1061  
Rockville, MD 20852

**RE: Docket No. 00D-1598**

Dear Commissioner:

I am writing to express my complete dissatisfaction with your agency's *Draft Guidance for Industry: Voluntary Labeling Indicating Whether Foods Have or Have Not Been Developed Using Biotechnology*, and to urge you to change the final version to bring it more into line with the will of American consumers. Specifically:

1. Labeling of foods containing GMOs should be MANDATORY, not voluntary. Since the food industry has made it clear that it does not want labels, it's obvious to everyone that there will be no labels as long as they are voluntary.
2. The burden of proof should NOT be placed upon those food producers who want to label their products as being free of GMOs. They were here first, and they are still the norm.
3. The biotech companies who produce the GMOs should be held strictly accountable for any resulting damage to the environment or to human health. (If genetic engineering is safe, as the biotech companies and your agency have decided, then why would the companies fear accountability?)
4. Extensive long-term pre-market testing of all GMOs should be mandatory. Your agency knows perfectly well that many of the hazards of modern technology--for example exposure to radiation--do not manifest their damage for many years.
5. No genetically modified organism should ever be grown, even for test purposes, in the environment without strict and thorough isolation to prevent it from contaminating the environment.

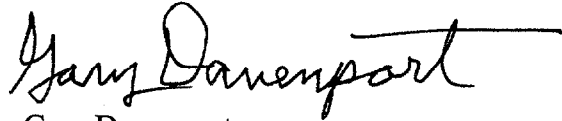
Finally, I want to point out that it is either incompetent or dishonest to present the issue of genetically modified food as a simple disagreement between science and ignorance, and to assume that your role is that of "educating" ignorant consumers so that they will see the truth. In actual

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fact, this issue is a disagreement between two different groups of scientists: those who take the view of the biotech companies, and those equally mainstream, respected, and even distinguished genetic scientists (Richard Lewontin of Harvard, for example, and many other concerned scientists, both individuals and groups) who insist that no one can possibly know what the ultimate results of this highly experimental technology will be. Thus what we have is not a simple matter of unscientific ignorance that has to be corrected; what we have is a controversy between equally respectable parties. In such an unresolved situation, the only justifiable course of action is to let the individual consumer decide for himself which "side" he wants to trust. And the only way the individual consumer can do that is through mandatory labeling of all foods containing any genetically modified ingredients.

Sincerely yours,

A handwritten signature in black ink that reads "Gary Davenport". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Gary Davenport