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Margaret Nagel
631 Hinman Ave.
Evanston, IL 60202-2514
(847) 475-0198
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FDA Commissioner
Docket No. OON-1396/00D-1598
FDA Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Dear Commissioner:

I strongly oppose the FDA's new rule and guidance on genetically engineered foods. I strongly believe that:

1. All genetically engineered foods and food ingredients should be labeled.

--The right to know what I am eating is surely fundamental.

--If these foods are not labeled, there is no way to link them to adverse effects that may occur in individuals or in the general population.

--The argument that the techniques of gene modification are simply the techniques of nature are mendacious, and we all know it. We cannot maintain that GE foods offer unique benefits to the public, while also maintaining that they are just like any other foods.

2. GE foods should not be assumed to be safe. They should be subject to rigorous pre-marketing safety testing.

--In maintaining that GE foods are simply foods, no different from other foods, the FDA has ignored the warnings of its own scientists that GE organisms are inherently unstable, and could develop highly undesirable characteristics over the long term. It has also ignored adverse findings by researchers such as Dr. Arpad Pusztai. The FDA, in fact, has tended to scoff at such findings as "bad science," while citing the GE industry's own studies as evidence that nothing is amiss.

--For example, the FDA has gone out of its way to tout the safety of rBGH, even though rBGH may very well promote cancer, as well as early maturation in young people, and disease in injected cows.

--The FDA has had strong ties with the GE food industry, via

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people such as Michael Taylor, Margaret Miller, and Michael A. Friedman, MD. Political contributions from the GE industry have surely played their part. The *NY Times* has spelled out in detail the ways that the GE industry has affected governmental decisions. Therefore the FDA is in no position to "assume" that GE foods are safe.

--We know that the GE industry has been allowed to pretty much regulate itself. With its inevitable bias on its own behalf, it has not regulated itself rigorously. For example, with rBGH, crucial adverse findings somehow were never taken into account by the industry or by the FDA.

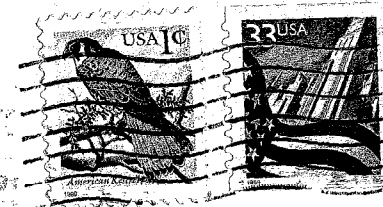
--In short, the FDA's open bias in favor of the GE industry is becoming a matter of public scandal. Major reforms are in order.

3. Because GE foods have been rushed into production with no real regard for long-term or subtle adverse effects, in an atmosphere of deceit, intimidation, and coverups; because these unlabeled foods may already be causing health problems without our knowing it; because meaningful findings adverse to the industry have been ignored; because governmental regulatory agencies have been permeated by people from the GE industry itself; because GE techniques of food production have resulted in no gains for the public whatsoever; because the world's people can be fed in safe, low-tech ways if the effort would only be made,

THERE SHOULD BE A MORATORIUM ON GE FOODS UNTIL LONG-TERM STUDIES SHOW THEY ARE SAFE FOR HUMAN HEALTH AND THE ENVIRONMENT.

Sincerely yours,
Margaret Nagel
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M. Nagel
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