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

Docket No. OON-1396 & Docket No. OOD-1598

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Dear Commissioner,

This is our response to the Food and Drug Administration's rules announced on January 18, 2001 regarding genetically engineered (GE) foods. We are completely opposed to any genetic engineering of plants, whether for food or any other use. In our eyes, the FDA ruling is quite inappropriate. Moreover, we are appalled that the FDA has overruled the pretty clear will of the people on this and have decided to allow the sale and use of genetically manipulated foods but without any reasonable safeguards. Until we consumers are able to rid our stores' shelves of these questionable products, as they have wisely done in Europe, we say **it is imperative that the FDA require that genetically manipulated foods and products must absolutely be clearly labeled as such.**

The problem with genetically engineered crops is that we do not know what will happen if we eat these things, particularly as we will be eating so many different types of manipulated plants in unique combinations, too many to be tested for. As you probably know, some folks are so allergic to peanuts that their potentially lethal allergy can be triggered by eating a peanut-free candy bar that was processed in a machine which previously processed a peanut-filled candy bar. So what happens when you get a plant which now contains peanut genes? Combined with yet other potential allergenic plants?

Then there is the issue of direct poison. Some genetically engineered plants are actually defined as pesticides by one government bureaucracy but as food by another. Which is it to be? Do you personally enjoy the idea that you may be unknowingly eating pesticides directly?

And there is the ethical issue of humans playing gods, which we are clearly not and so should stay out of the god business, period. God did not intend for fish genes to end up in potatoes, etc.

I just heard some scientists talk on the radio about genetics in relation to aging. They said that most genes concern growth so if you manipulate a gene for longevity, it will probably be at the expense of some other, more vital aspect of growth. They mentioned a fruit fly study where the flies' genes were engineered so they would live longer in the lab. But when those flies were released into the wild, they proved to be significantly less "hardy." I.e., they couldn't cut it in the competitive fly-eat-fly world. They never got to utilize their fine long-life genes because they died early. But this type of research is never linked to food crop issues. So what are we really creating in the labs? We are not gods and can not foresee the ends.

What happens if farmers switch en masse to some "new, improved" seed that in reality can not cut it in the real world? How about mass starvation or significantly higher food prices?

But the real reason for gene manipulation is not to piously help feed the starving masses, as we are told. Instead, it is to have a patent on the seed so that farmers must buy their seed each year from the patent holder... at much greater cost than setting aside part of the previous year's crop for the next year's planting. This is called greed on agribiz's part.

And as for the claim that G.E. crops have higher nutritive value than plain crops, there is scientific evidence to the contrary, (which probably has roots in the fruit fly example). For example, soy beans' nutritive value actually suffers when it comes to the plant's properties concerning cancer resistance in humans who eat soy bean products.

Equally worrisome is the issue of law suits against farmers whose non-patented crops get fertilized accidentally (bees and birds don't know too much about fences or patent law) with patented plant's pollen. And these types of law suits have actually already begun in the courts. When you know that corn pollen can blow for several miles it is clear that buffer zones are not adequate to prevent pollen drift.

All in all, we feel that the potential for good is so far outweighed by the potential for bad that there is no justifiable grounds for allowing any form of genetic engineering of any crops, period. And barring that, the consumer should have the right to know which foods or food products contain GE foods so that they can make an informed purchasing decision. In addition, GE crops should only be grown in tightly controlled greenhouses rather than open fields, if allowed to grow at all.

Sincerely,

*Terran Doehrer*

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