

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

0697 '01 FEB 8 12:30 February 5, 2001

Dear Sir or Ma'am,

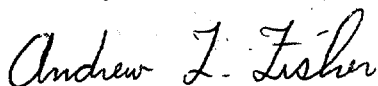
As a concerned and informed citizen and consumer, I demand that the FDA recognize and implement the following points with regards to genetically engineered (GE) foods:

- **The US is “flying blind” in it’s mass production of GE foods:** In his April 8, 2000 lecture, Dr. Barry Commoner held up a long rope with differently colored sections representing the different amino acids in a protein. However, he pointed out that a straight, unfolded string of amino acids is essentially “dead.” Then, he squeezed his colored rope to have us see visually that any protein can form into many different shapes. The number of different twists and turns possible for a single protein has been calculated as one followed by one hundred zeroes! He emphasized that the particular places where amino acids touch make up the active sites of the protein and depending on how it has folded, we get completely different active sites. Dr. Commoner told us that the genetic engineering; industry has been ignoring the folding of the proteins. GE foods could be toxic, could cause allergic responses, could have lower nutritional value, and could compromise immune responses in consumers! He gave us a scary example of a kind of protein-an infectious prion, sometimes called a slow virus, which is just a protein and has been proven to contain no nucleic acid whatsoever (no DNA nor RNA). An infectious prion can have exactly the same amino acid sequence as a normal prion that is found in the brains of mammals. However, with its different **shape** it can cause a cascade of normal prions to imitate the viral prion shape and become in turn infectious prions themselves. Then, the infected animals (including human beings) gradually die of an incurable and always fatal encephalitis (inflammation of the brain).
- **FDA must Require mandatory pre-market environmental review and manditory labeling of GE foods:** In agriculture and food production, genetic engineering has been introduced wholesale with no control of drift and without knowledge of the amazing and possibly disastrous ramifications of the introduction of foreign DNA into unrelated living species, where we can picture an almost infinite number of new protein shapes with new active sites and consequences. For our food, we need to follow the European example and demand labeling, rather than the present inundation of our markets with unlabelled genetically engineered food.

**This “Notification” policy is an insult to consumers**, and irresponsibly ignores strong scientific evidence of numerous potential health and environmental risks of GE foods. These Rules appear to be a decision made to convenience industry at the expense of public health, consumer information, and the environment.

Thank you for your consideration.

Sincerely,



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