PAUL D. DUMOUCHELLE

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February 5, 2001

Docket No. OON-1396 & Docket No. OOD-1598
FDA Commissioner, Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Dear Sirs:

Genetic engineering involves manipulations of genes between different species and allows scientists to bypass the natural barriers protecting the genetic integrity of species. Foods containing or produced from genetic engineering can cause allergic responses, have lowered nutritional value and/or compromise immune responses in consumers. Likewise, genetically engineered crops can have unpredictable, irreversible changes to the environment.

FDA's proposal for companies to merely voluntary consult with FDA concerning the safety of their foods is inadequate. FDA must require MANDATORY pre-market safety testing.

FDA's proposed rule that environmental review procedures be exempt under the National Environmental Policy Act does not protect the environment. FDA must require MANDATORY pre-market environmental review.

FDA's proposed rule makes all labeling of genetically engineered foods (GEFs) only voluntary. This does not protect my right-to-know or allow me consumer choice to protect my family and the environment. FDA must require MANDATORY labelling.

FDA's proposed rule is unlikely to provide the public with adequate information on GEFs for independent review. The FDA notes that producers of GEFs may claim that such information, including the premarket notification, is trade secret or confidential business information subject to exemption from disclosure requirements. FDA must require full disclosure.

I will settle for nothing less than mandatory safety testing, labeling, pre-market environmental review, and full diclosure.

Sincerely,

Paul D. Dumouchelle

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