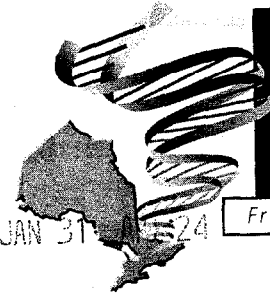


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ONTARIO  
Agri-Food  
Technologies

From Discovery to Profit

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January 22, 2001

Dockets Management Food and Drug Administration  
5630 Fishers Lane Room 1061  
Rockville Maryland 20852

I write not as an American but as a Canadian who is very much involved in biotechnology issues and a member of Canada's National Voluntary Labelling Committee. I am a scientist by training.

In Canada as you should know we regulate by novelty of proteins not by r-DNA technology. Mutagenesis, outcrossing, cloning or whatever biotechnology method one uses is subject to regulation if novel proteins or other ingredients are created.

Question:

*Will herbicide tolerant crops developed through accelerated mutagenesis be able to claim, "not derived through biotechnology" – many single nucleotide polymorphisms could have occurred?*

*Will outcrossings where thousands of genes move between species i.e. beefalo, melon/cucumber crosses be able to claim "not a product of modern biotechnology"?*

*Will cloned animals (technically very difficult) or their progeny be able to claim "not a product of biotechnology"? In this case there is not novel proteins, but definitely biotechnology.*

In summary, product novelty not the process should be the trigger for regulatory oversight and labeling.

Sincerely,

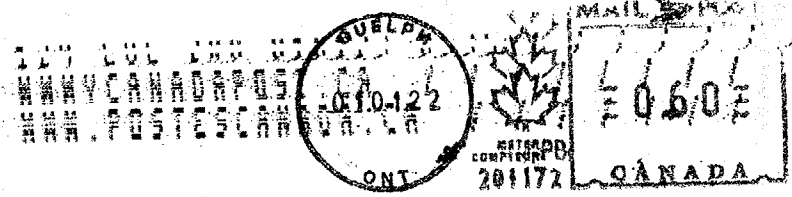
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