

The Farmworker Association of Florida, Inc. La Asociación Campesina 977 Asosiyasyon Travayè Latè

February 28, 2001

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FDA Commissioner Food and Drug Administration 5630 Fishers Lane, Room 1061 Rockville, MD 20852

VOLUSIA COUNTY P.O. Box 496 Pierson, FL 32180 (904)749-9826 Tel. (904)749-4398 Fax

Re: Docket No. OON-1396 / OOD-1598

Dear FDA:

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DADE COUNTY P.O. Box 343502 Homestead, FL 33034-0502 (305)242-0032 Tel (305)242-1154 Fax

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COLLIER COUNTY P.O. Box 389 Immokalee, FL (941)657-8263 TeL (941)657-8262 Fax

The Farmworker Association of Florida (FWAF) is writing to express opposition to the FDA's new proposed rule and guidance on genetically engineered (GE) foods. Voluntary labeling and notification proposals are not in the best interest of consumers and the public. Human health would be put at risk from foods that could cause and/or aggravate allergic reactions. Not only should all GE foods require mandatory labeling, but that labeling should be in English and Spanish so that the large Spanish-speaking population in the U.S. would be alerted to take precautions in making their food purchases.

However, FWAF has serious concerns with the use of GE foods for human consumption in general. Many farmworkers are illiterate or barely literate. Even mandatory labeling is unsatisfactory in protecting their health. There should be, at a minimum, a symbol system developed to indicate which foods contain GE products, and the FDA should then implement an education campaign to teach the public the meaning of these symbols. Farmworkers in Florida worked hard for many years for the eventual passage of a Right to Know Law such that they can have access to information on the pesticides and chemicals that they are being exposed to in the workplace. The current GE food standards proposed by the FDA are just another assault on the workers in which they and their families are victims of the negligence of the agricultural industry.

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Farmworker children are vulnerable to the many types of environmental contaminants that are commonly found in their living and working environments. Their bodies are faced with an onslaught of potential health threats. Adding GE foods to their diet, for which the long-term health effects are not well studied nor understood, has the potential to aggravate or induce the health risks/problems that they face.

FWAF is, also, aware that there are some serious environmental concerns from the production of GE foods. Eco-system balance may be compromised by the introduction of modified genetic organisms into the gene pool. We cannot support the continued planting of GE crops as long as questions still exist regarding these concerns.

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Page 2

Lastly, we are well aware of the power of the agricultural industry and the political influence of agribusiness. We feel it is imperative that the FDA serve the people of this nation and not corporate interests. Arguments by industry that GE foods are the answer to feeding a growing population are a means to steer research in a certain direction, while alternatives that are safe for human health and the environment receive fewer research dollars.

We look forward to engaging in dialogue with the FDA on this important issue.

Sincerely,

Tirso Moreno

General Coordinator

TM/ee