Presentation Convent
107 Old Soldiers Road
Cheltenham, PA 19012
October 3 1,200 1

Jane Henny
FDA Commissioner
Dockets Management Branch (HFA 305)
Food and Drug Administration
5630 Fisher's Lane, Room 1061
Rockville, MD 20852

RE: Docket No. OON-1396, and OOD-1598

Dear Commissioner Henny:

The FDA's proposed new policies on genetically engineered (GE) foods are not adequate to protect human health or the environment. Despite overwhelming consumer demand, the FDA still fails to require safety testing and mandatory labeling for GE foods.

The new "voluntary labeling" polic6 denies consumers a basic right to know and puts the burden on the consumer (to seek products that are voluntarily labeled) rather than on the producer (to completely identify ingredients). Without mandatory labeling, neither consumers nor health professionals will know if an allergic or toxic reaction was the result of a genetically engineered food.

Consumers will also be deprived of the critical knowledge they need to hold food producers liable should any of these novel foods prove hazardous. The "notification" policy is an insult to consumers, and irresponsibly ignores strong scientific evidence of numerous potential health and environmental risks to GE-foods. While no products currently on the market have yet been proven to cause harm the FDA certainly knows that there are many unknowns regarding potential toxicity and allergenicity. The "notification" policy does not respond to concerns about long-term safety testing.

By refusing to require both labeling and mandatory safety testing of foods, the FDA's proposed rules appear to be a decision made to convenience the industry at the expense of public health and the environment.

I urge you to reconsider this proposal and insure that GE-foods are subject to pre-market testing and labeling.

Sincerely,
Sister Joan Melley, SSJ