

February 12, 2001

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

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Re: Docket No. 00N-1396
Docket No. 00D-1598

FDA Commissioner:

FDA's new proposed rule and guidance on genetically engineered (GE) foods are patently one-sided and devoid of protections for the food eating public in this country. They must be withdrawn, and FDA must act on its responsibilities to the public interest in devising new rules.

The recognized potential for GE foods to cause allergic reactions, to be toxic, to interfere with immune responses, and to have lower nutritional value than food that has not been altered argue against FDA's finding that these foods are "generally recognized as safe." FDA's own admission in court that it has made "no dispositive scientific findings"¹ about the safety of genetically engineered foods and safety concerns raised by FDA scientists testify further to the falseness of the safety claim. **Until human safety tests show that these foods pose no dangers to health, they must not be marketed.**

The genetic pollution spread by GE crops requires that mandatory environmental reviews be undertaken before these crops are allowed to be planted. Contamination of traditional crops is already occurring and must be stopped. The burden of proof that GE crops pose no threats to the wider environment must reside with the companies that are developing them. If those companies cannot ensure that their crops will not contaminate other life, GE crops must not be approved for planting. In addition, companies that release GE crops into the environment must be held accountable for their adverse effects on surrounding life.

Assuming that GE crops pass rigorous human safety and environmental tests, the food eating public must be informed when food contains genetically modified organisms. By not requiring mandatory labeling of genetically engineered foods, FDA is ignoring the overwhelming support for labeling that the FDA itself received in comments in addition to several independent public opinion polls which consistently report over 80% and often 90% approval for mandatory labeling. **In the face of this overwhelming public sentiment, the acknowledged uncertainties surrounding GE foods, and the documented threats posed by them, FDA's current position against mandatory labeling is indefensible and should be reversed. Voluntary GE labeling is no labeling at all.**

The people of this country and of the world have a right to know the content of the food we are eating and the consequences that flow from its production. To deprive us of such information is to skew the marketplace unfairly in favor of the corporations who produce these foods and to shield those corporations from accountability for their actions. Those are not legitimate roles for FDA to play.

Genetic engineering of crops constitutes a major departure from the way in which food has been grown up to this point. It has created legitimate and unresolved concerns about food safety, environmental pollution, and social justice. The FDA's mission is to serve the public interest. The public interest demands that FDA cease acting as a public relations and marketing agent for genetic engineering corporations and begin protecting the public's health, the environment that ensures that health, and the free flow of information.

Sincerely,



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cc: Representative Frank Wolf
Senator John Warner
Senator George Allen

¹ Center for Food Safety, *The Hidden Health Hazards of Genetically Engineered Foods*, Spring 2000.

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