



Sierra Club

Cumberland Chapter

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March 12, 2001

P.O. Box 4307
Midway, KY. 40347

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

RE: Proposed Rules for Genetically Engineered Foods

Dear Sir:

I am writing on behalf of the Cumberland Chapter of Sierra Club to express the Chapter's concern about the inadequacy of the proposed rules for GEF's.

Genetic engineering involves the manipulation of genes between different species and allows scientists to bypass the natural barriers that protect the genetic integrity of species. Foods produced in this manner can cause allergic responses, can be toxic and can have less nutritional value. Genetically engineered crops can produce unpredictable and irreversible changes to the environment as well.

The agency's proposal to have companies merely consult with FDA on a voluntary basis concerning the safety of their foods is unacceptable. FDA must require mandatory pre-market safety testing.

FDA's proposed rule that environmental review procedures be exempt from the requirements of the National Environmental Policy Act is not appropriate. FDA should require mandatory pre-market environmental review.

FDA's proposal to make labeling of genetically engineered foods voluntary is also inappropriate. This does not protect the public's right to know, nor does it allow consumers to make an informed choice about whether they want genetically engineered foods for their families. Mandatory labeling is essential to

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maintain the traceability of GEF products in the food supply and it protects overseas markets for farmers. Although producers of GEF's may claim that labeling or any pre-market notification is a trade secret or confidential business information, the FDA must require full disclosure.

The public will settle for nothing less than mandatory safety testing, labeling, pre-market environmental review and full disclosure. All GEF's should be removed from supermarket shelves until these basic principles have been adopted.

Thank you for the opportunity to comment.

Yours truly,

Betsy Bennett

Betsy Bennett
Conservation Chair



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