

Feb. 8, 2001

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

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RE: Docket No. 00D-1598 (*labelling of genetically engineered foods*)
and Docket No. 00N-1396 (*pre-market testing of genetically engineered foods*)

Dear FDA:

I am extremely concerned about your proposed policies on genetically engineered (GE) foods. Despite overwhelming consumer demand, your agency is still failing to require basic safety testing or mandatory labeling for GE foods. Labels on GE foods are required in Japan, Russia, and throughout Europe, and opinion polls state that the majority of Americans want testing and labelling, yet your new proposal continues to deny Americans the right to know and trust what is in our food.

There has been ample evidence submitted to the FDA revealing that genetically engineered foods are *not* "substantially equivalent" to non-genetically engineered foods, that there are numerous health and environmental risks. Species boundaries are crossed and new, potentially-toxic proteins created. We are eating experimental food never before consumed in the history of mankind. Your agency is failing to protect us.

FDA's voluntary labeling guidelines (Docket No. 00D-1598) are unacceptable since we all know the industry will *not* choose to label this food. Labels must be *required* so we can have a choice in what we eat. Labelling will also serve to protect us from potential health effects that could only be traced if GE foods are identified. The second proposed rule (Docket No. 00N-1396) requiring companies to notify FDA before bringing GE foods to our supermarket shelves is woefully inadequate. You do not even require the basic testing given to food additives. Genetically engineered foods have additives — from other species, bacteria, and pesticides, to name a few. We want safety testing of genetically engineered foods before they are placed on our grocery shelves.

Recently, both the E.U./U.S. Biotechnology Consultative Forum and the Consumer Federation of America recommended mandatory labelling of genetically engineered foods. The FDA should heed this and stop working on behalf of the manufacturers of genetically engineered foods. Instead, begin to work for the safety and rights of the American public, your actual constituency. Genetically engineered foods should be tested and labeled!

Sincerely,

Bruno F. Schaufelberger
Thank you!

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P.S. I strongly recommend that FDA key personnel, concerned with Genetic Engineering, read the objective article on the same subject, published by ORGANIC GARDENING MAGAZINE (Jan/Feb 2000)

00N-1396

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