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Dr. Jane E. Henney
Commissioner of Food and Drugs
Department of Health and Human Services
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Dr. Henney:

Thank you very much for your letter of February 18, inviting me to take part in one of two public meetings that the FDA is holding to explore ways to work with outside organizations and individuals on public health issues.

As both a grower and a researcher in sustainable agriculture, I will be too busy with spring planting and soil sampling to attend either of the upcoming meetings. However, I applaud your efforts to increase citizen involvement in FDA policy development. Having read over the materials you sent me, I would like to submit a few comments.

First, I noticed that some of the current and proposed collaborative projects include government, industry and university participants, but no citizen's organizations are represented. For example, the Moffett Center for Food Safety and Technology includes "industry, the Illinois Institute of Technology, and the University of Illinois' Food Science Department." The Product Quality Research Institute (PQRI) includes seven pharmaceutical-industry and pharmaceutical-science organizations, plus the FDA's Center for Drug Evaluation and Research. In some of the five "proposed initiatives" a desire to involve "stakeholders" is indicated, but consumers' organizations were not specifically mentioned.

I believe it is essential to include some effective and direct representation of citizens' interests, such as:

Positive Futures Network, 712 Cherry Ave NE, Bainbridge Island, WA 98110; tel. 206-842-0216; fax 206-842-5208; website www.yesmagazine.org. Positive Futures Network is committed to seeking "win-win" solutions that represent citizens and protect consumer safety and the environment, while promoting innovative sustainable development. Having a representative of Positive Futures participate at one or both meetings would greatly assist you in reaching your goal of protecting public safety in food and drug technology development.

Public Citizen (1600 20th Street NW, Washington, DC 20009-1001; tel. 202-588-1000; website www.citizen.org). This group competently represents citizens on a wide range of issues, including food and drug safety.

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United States Public Interest Research Group (PIRG) - also has state chapters around the country. I do not have their address, but it should be easy to find in the phone book or on the Web.

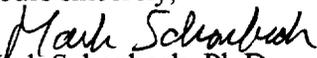
Campaign for Food Safety (6114 Highway 61, Little Marais, MN 55614; tel. 218-726-1443; web site www.purefood.org).

I feel that citizen involvement is particularly important when it comes to the new technology of genetically engineered food crops. FDA has come under tremendous pressure from the biotechnology industry to allow these products to be rushed onto the market with inadequate testing and without labeling requirements that allow citizens a choice in whether or not to eat genetically engineered foods. It is a matter of record that a number of FDA scientists have expressed serious concern over this matter, particularly in the case of recombinant bovine growth hormone (rBGH), yet these concerns have not been taken into account in development of FDA policy. Thus it is essential to include consumer groups as well as industry and university representatives in FDA's "leveraging with outside organizations and individuals." The Campaign for Food Safety should be represented in food safety discussions at the upcoming meetings.

I have much less knowledge and experience with drug safety issues. However, Public Citizen includes a Health Research Group (contact address same as above), which would be an excellent representative of consumer interests at the upcoming meetings.

I hope this is helpful to you in seeking win-win solutions that represent citizen interests as well as industry, and that place public well being ahead of corporate profits.

Yours sincerely,


Mark Schonbeck, Ph.D.

→ cc: Dockets Management Branch

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