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10 July 2000

Commissioner Jane Henney
Docket No. OOP-12311/CP1
FDA Dockets Management
Branch (HFA-305)
5630 Fishers Lane, Room 1061
Rockville MD 20852

Dear Ms. Henney:

I am writing to express my concerns about the lack of control over the creation, production and use of genetically-modified organisms (GMOs). Our bodies and the environment constitute a series of complex interactions. Science has only been able to document and comprehend a small part of this chain of interactions. Given our long, well-documented history of failing to predict the consequences of interfering with this complex chain (kudzu, antibiotics creating resistant bacteria, and pesticides resulting in tougher insects being among some of the more well-known instances), we should be extremely cautious in introducing GMOs into our diets and environment. "The very definition of a species is that it is a closed gene pool and violating those boundaries is a very reckless act which will inevitably have many unforeseen consequences" (Kenny Ausobel, Co-Founder of Seeds of Change and the Bioneers Conference).

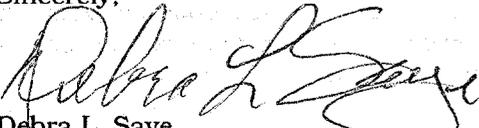
The technologies for genetically-modified organisms are crude, unreliable, uncontrollable, unpredictable and inherently hazardous. These genes can change their structure and mutate in response to the environment. It is well-documented that genes jump from one plant to another fairly frequently, meaning that it is not at all unlikely these could create more pest-resistant, faster-growing, larger, more prolific weeds. Our experience with introducing exotic plants into new habitats has shown how greatly it reduces biodiversity. Transgenic plants will surely be worse. Failed experiments with genetically modified plants have already shown that GMOs can result in unpredictable toxins and allergens. These are just a few examples; the list of known and potential problems is long.

Much of Europe, Asia and Australia have already placed tight controls on GMOs. I support the Pacific Declaration of July, 1999, HR 3377, and the petition filed with the FDA regarding genetically-modified organisms by the Center for Food Safety. I believe the United States should protect public safety by requiring:

- mandatory labeling of all genetically modified foods.
- a ban on all patents of living organisms, cell lines and genes.
- the adoption of strict regulations for the health and safety testing of all GMOs.
- an immediate moratorium on further releases of transgenic crops, food and animal feed products for at least five years.
- requirements for comprehensive assessments of environmental risks associated with GMOs.
- a comprehensive inquiry into the future of agriculture and food security.

Genetic engineering technology "faces our society with problems that are unprecedented not only in the history of science, but of life on the Earth" (Nobel laureate and biologist George Wald). Genetically-engineered organisms are a BIG mistake. I DO NOT want to eat genetically modified food and I DO NOT want to suffer the resulting consequences in the environment around me. GMOs are a horrific and unnecessary risk that benefit no one but the biotechnology companies and their investors. If it were up to me GMOs would be banned altogether.

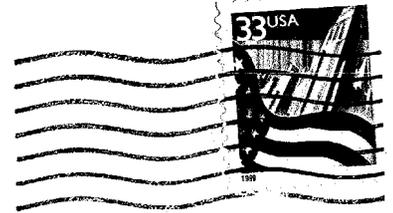
Sincerely,


Debra L. Saye

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