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Commissioner Jane Henney
Docket No. 00P-1211/CP1
FDA Dockets Management Branch (HFA-305)
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Dear Ms. Henney:

I write you to add my voice to those concerned about the Genetic Engineering of foods.

I do not feel that ALL such experimentation is evil, or bad; but I do feel that we, as a society and as a civilization, need to take a clear look at what it is we are doing, and act with a depth of soul to match the depth of God-like-ness that lies hidden within the term "genetic engineering".

The ancient Greeks had a term "hubris", which i believe can be translated roughly as "if you set yourself up as a god, and act with too much arrogance, then you are almost surely setting yourself up for a serious fall".

I think that this frame of reference needs to be considered much more than it has been thus far; and this is mostly because when we engineer new species -- we really are playing God... That is, we are doing the things that holy scripture ascribes to God: bringing forth plants & animals & so forth.

And because of this, if we are to avoid a fall -- we ought to proceed with some caution and thought, just on general principles.

From these general principles, I look at past introductions of new species into the environment, and i see a need for caution. Non-native species just seem to take over and become pests: starlings crowd out native birds, knapweed crowds out native grasses, kudzu takes over acreage in the South...the list just goes on and on and on...

It seems to me that we are plowing full-speed ahead, with little thought as to where we are going; and anyone who objects gets shoved aside.

The FDA is supposed to protect the public; that is its charter; but the operating truth appears to be protect industry first, worry about the public later.

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But i write to you in the hope that some of you, perhaps many, or most of you -- really want to serve the public; especially if a way can be shown.

So let me suggest:

1. That full labelling be required for ALL items of relevance; and that ANY REASONABLE claim be allowed.

- a) Labelling. It is **outrageous** that concerned citizens are denied their right to know what they are purchasing, and what methodologies their purchases support. This does not befit a free society or the FDA's purpose.
- b) Any reasonable claim. The presumed benefits, whether in the form of a better quality product, or a cheaper cost, should be there in writing for all to read.

And health claims for foods (& vitamins!) should be allowed as well, such as "broccoli can help prevent cancer", provided they are accompanied by a disclaimer: "This statement has not been evaluated by the FDA".

Why promote ignorance? Rather, why not promote knowledge?

2. Begin to actually DO some evaluations of claims,* including (but not limited to) claims re. genetic engineering. Start with the most serious claims first (so as to negate them, if false; or to promote public health, if valid)..
...And if the evidence is mixed, or unclear -- so be it. If there are several points of view, then post each one!

Please set the evaluations out in plain sight -- right next to the claims on the box, or by the produce,... and in full (or at least substantial) detail...
"..Not-evaluated-by-the-FDA" should become a historic artifact, that we can wonder at how we were once so short-sighted:

Evaluation should become the norm -- that's what protecting the public is all about!

3. Absent a clear and present danger (which, incidently, might well be posed by genetic engineering!) the FDA's power-to-control ought to be cut way back!

Get back to the principle that **the government in general, and the FDA in particular is here to serve the public, not to make our decisions for us.**

Let the **public** sift truth from fiction,
Let the **public decide** what promotes or degrades health.

Why should it be so hard for me, and other concerned citizens, to find out whether our food has been genetically manipulated?

Yes I know that humans have been manipulating genetics for a long time, but up until now -- nature had to actually, biologically support the endeavor.

Only those variations that could grow and develop in nature lived to tell the tale of who or what they might become.. .../and species that attacked & lived off a newly emerged species developed more or less concurrently.

But now we are playing God at a far more serious level; and many more combinations are possible.

As i said at the beginning, I do not condemn gene splicing out of hand; but at the same time --

I think that we really need to give some **WEIGHT** to the fact that nature has chosen to NOT produce such an entity on her own; and to ask ourselves if perhaps, just perhaps -- there is a bit of "hubris" in producing an "un-natural" plant or animal; and just perhaps, therefore: we should be extra careful to check out what this new species might portend for the planet.

Splicing a Bt gene into cotton, for instance, when Bt is such a mainstay of organic agriculture -- is rather like prescribing antibiotics promiscuously.

Then five or ten years down the line, when Bt-resistant bugs have become the norm -- you can say "Oh -- we're sorry... How could we have known this would happen?"

A little thought might do wonders for future generations,

but the measure for decision seems to be "who has more money today -- the cotton industry or organic farming".

The shape of things tomorrow doesn't seem to count for much.

And so, for lack of political clout, the **public's interest** in healthy food, and the **public interest** in a stable environment, gets lost in the race to secure industry profits.

You: the FDA, are supposed to protect us, the concerned public; but the supporting evidence is a bit thin.

To summarize:

1. Let us have a full deck to work from!!
As consumers, we have a right to know
what it is we are buying and supporting.
2. Prohibit practices that bring harm to the society-at-large,
and from which an individual has no escape.

Check out genetic engineering more thoroughly
regarding overall risks to the environment;

Realize that we ARE playing God with this technology,
and we need, therefore, a Deep Responsibility
to go along with the **immense power** of this Creation.

3. Re-affirm of our historic right as citizens to choose
intelligently
and for ourselves.

Encourage easy public access to information from all sources,
including those with vested interests;

For balance, post honest scientific evaluation,
also with easy public access, and allowing for
multiple points of view;

Try to avoid propaganda;

"...The remedy is not to take (the people's power) from them
but to inform their discretion."

Thomas Jefferson

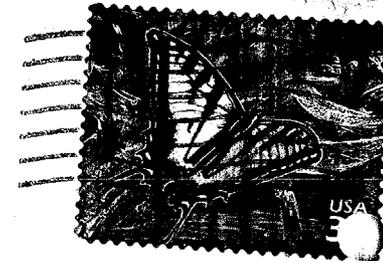
Thank you!

Sincerely,

Ron Warsher
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* Perhaps split the cost of validating a claim, 50-50,
or 80-20, or 92-8, or whatever:
perhaps different percentages for different situations;
maybe even 100%-0% for cash-strapped farmers,
but with industry giving more support
as its payoff from a validated claim increases.

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