



MINNESOTA CATHOLIC CONFERENCE

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March 8, 2001

Docket Number 00N-1396 and Docket Number 00D-1598
FDA Commissioner
Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Dear Sir or Madam:

The Minnesota Catholic Conference is privileged to speak for the Bishops of the six Roman Catholic Dioceses who provide leadership for approximately 1.25 million Catholics in the state. Catholic institutions employ well in excess of 20,000 persons across the state, and the Church is the largest provider of non-public education and social services in Minnesota.

The following comments are submitted concerning the proposed Food and Drug Administration (FDA) regulations on genetically engineered (GE) food. We urge the FDA to revise its proposed rules in order to include:

- required mandatory labeling of GE foods;
- required mandatory pre-market safety testing;
- required mandatory pre-market environmental review.

Requiring mandatory labeling of GE foods protects consumers' right to know the content of their food. The Catholic Tradition teaches that all people have the right to an accessible, healthy food supply. It is the consumers' right and duty to decide what is in their best interest to consume, not that of government or industry. Without mandatory labeling, consumers are denied this ability to choose. Furthermore, without mandatory labeling, neither consumers nor health professionals will know if an allergic or toxic reaction stems from the use of a GE food. Consumers would be deprived of the ability to hold food producers accountable should any GE foods prove to be hazardous.

Requiring mandatory pre-market safety testing helps to alleviate some of the concerns that arise because GE foods are a novel product. There has been no study of the long-term effects of GE foods on humans. GE foods could be toxic, could cause allergic responses, could have lower nutritional value, and could compromise immune responses in consumers. Mandatory pre-market safety testing would provide an impartial, scientific means by which to detect and avoid these potential hazards.

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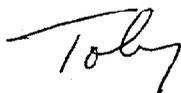
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Requiring mandatory pre-market environmental review addresses the unknown consequences of GE foods on the natural world. The Catholic Tradition teaches that we must be respectful stewards of God's creation. The fact that GE foods could cause irreparable long-term harm to the environment, and that such consequences have not been thoroughly tested, requires us to be extremely cautious in our adoption of this new technology. Mandatory pre-market environmental review allows more confidence that our agricultural system will promote the continued sustainable use of our natural resources.

Thank you for taking the time to consider these suggestions. If you have any questions or comments, please do not hesitate to contact me (651-227-8777).

Sincerely,

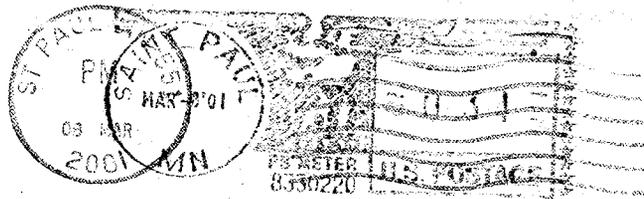
A handwritten signature in black ink, appearing to read "Toby".

Toby Pearson
Director of Social Concerns
Minnesota Catholic Conference



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