

124 N. Maple St. Bowling Green, Ohio 43402

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August 1, 2000

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Jane E. Henney, M.D., Commissioner
FDA Dockets Management Branch
5630 Fishers Lane, Rm. 1061 (HFA-305)
Rockville, Maryland 20852

RE: Docket NO.s 00P-1211/CP1 and 99N-4282

Dear Dr. Henney:

We are writing in support of a legal petition filed with your agency on March 21st of this year by the Sierra Club and some 50 other citizen organizations. As you know, this petition addresses concerns shared by many Americans as to the health and environmental safety of transgenic agricultural products. We feel strongly that when long-term outcomes are uncertain, the precautionary principle should prevail. However, even if transgenic foods could be guaranteed safe for human consumption, there would still be no assurance that unforeseeable hazards might not result from their release into the natural world.

For these reasons, we ask you to rescind the 1992 policy on genetically engineered foods and instead implement regulations for these products in compliance with the Federal Food, Drug and Cosmetic Act. We feel it is essential to require rigorous pre-market safety assessments, comparable to the procedures stipulated in the food additive petition process. This would allow for appropriate evaluation of the potential toxicity, allergenicity, and other unintended effects of transgenic foods.

In addition, we believe it is paramount to require a thorough and timely environmental impact analysis for each transgenically produced food ingredient that may have access to our nation's natural environment. As you are no doubt aware, a recent issue of *US News and World Report* (4/10/00) discussed current research on this problem in an article titled "Of Genes, Grain, and Grocers." It reports that biologists at Ohio State University have published a study affirming the "superweed" scenario, whereby crops genetically altered to resist herbicides cross-pollinate with related weed species to produce even tougher, undesirable plants. Of still greater concern are effects of the toxic Bt gene that is known to harm beneficial insect predators, as well as innocent by-standers like the monarch butterfly. New research demonstrates that Bt-bearing crops can alter soil chemistry and natural microbial life long after the plants have decomposed.

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These findings clearly indicate that researchers have barely started to reveal the far-reaching potentials of genetically modified organisms to disrupt the delicate balance of nature. We whole-heartedly believe that it is not a moment too soon for a responsible government agency to begin supervising these substances and monitoring their effects.

With thanks for your consideration of these serious matters,

Sincerely,

A handwritten signature in black ink, appearing to read "Jaak Panksepp", with a large, stylized flourish at the end.

Jaak Panksepp
Distinguished Research Professor, Emeritus
Bowling Green State University

A handwritten signature in black ink, appearing to read "Anesa Miller", with a long, horizontal flourish extending to the right.

Anesa Miller, Ph.D.
Independent Scholar
and Writer

Anesa Miller
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