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Admitted New York and New Jersey

July 1, 2000

Jane Henney, M.D. (HFA-305)
Commissioner
Food and Drug Administration
5630 Fishers Lane - Room 1061
Rockville, Maryland 20852

Re: Docket No. 00P-1211/CP1

Dear Commissioner Henney:

I am writing to express my concern for release of GMOs to the environment and to support full public disclosure of all food and food products, including fresh produce, which are or which contain GMOs, including fully informative package labeling.

This letter, though long-delayed on my part, is propitiously timed nevertheless, coming as it does on the heels of this week's announcement of the essential completion of the first phase of the Human Genome Project. At hand for the first time in human history is the sorcerer's book of "magic spells" -- the spelling of the genetic messages which forms the marching orders for the assembly of proteins which direct all life on earth.

What more appropriate message, opportunity and scientifically sound justification for the FDA to call a moratorium to further experimentation with our genetic heritage through the introduction of genetically modified organisms (GMOs) to the environment? As an outspoken environmentalist for over thirty years and the former Associate Regional Counsel of the United States Environmental Protection Agency Region II office, I have since the beginning of genetically modified agriculture in the United States, been involved in the public debate surrounding that issue. In the early 1990s, one of my petitions to the federal government was instrumental in achieving a significant suspension of the permitting of "pesticide-resistant" seed organisms for introduction to the environment.

Now that it has been proven that science possesses the tools for interpreting the genetic constitution of organisms, it is only a matter of time before understanding of these organisms' role in the overall genome of the world biosphere becomes possible. While it may take centuries, even at today's dizzying pace of discovery, to acquire a workable integrative understanding applicable across all biota, extraction of many of the fundamental principles is certain to come much sooner.

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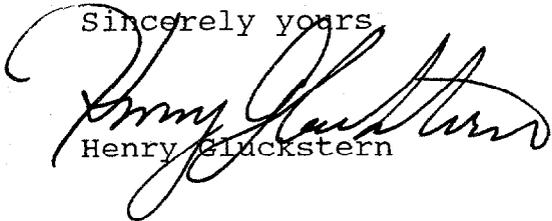
What could be a greater incentive than this newly gained knowledge for scientist/regulators such as yourself to acknowledge that we have much to learn, and that the headlong plunge of for-profit mega-agribusiness, controlled as it is by a handful of international corporations, into a feeding frenzy of development and marketing of genetically altered organisms, each accompanied by a facile justification of its superiority and benefit (not to mention a frequent coincident resistance to the same manufacturer's biocide), is neither a necessary nor the best regulatory decision at this time?

Natural selection has spent 3.5 billion years shuffling the cards in its own "random" order. But how much do we really know about that "randomness," directed as it has been during each moment of those 3.5 billion years by the uncountable interactions of the collective genome of the entirety of creation? What tools can we presently lay claim to which can instruct scientists as to whether the insertion of a DNA segment into a plant or biological intended for release beyond the walls of the laboratory somehow goes against the grain and pattern of those prior 3.5 billion years in some fundamental but totally unknowable way? Can we risk the unknowable and possibly disastrous consequences in our present state of ignorance? The monarch butterfly's metabolic instruction to exhibit mortality upon exposure to GM corn is a harbinger of a myriad of other, totally unknown consequences of introduction of GMOs to the environment at a time when so little is understood.

The FDA should declare the same moratorium on GMO in the human food supply as has the European Economic Community abroad. There should be no introduction of GMOs into the environment for any purpose until biological science has advanced significantly beyond the bare threshold at which it stands today. At a minimum, if the United States government will not exercise reason, common sense, judicious decision-making, and the ability to examine these issues removed and detached from the justifiable excitement of mankind's recent genetic achievements and triumph, at a minimum, every one of the scores of millions of citizens who shares my view should have available the alternative of not supporting precipitous and impetuous agribusiness R&D and not using any such products in the family's diet.

Thank you for your thoughtful consideration.

Sincerely yours



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