

1407 SE 27th Avenue, #1
Portland, OR 97214
May 16, 2000
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Commissioner Jane Henney
Docket No. ooP-1211/CP1
FDA Dockets Management Branch (HFA-305)
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Dear Commissioner Henney:

I am writing to express my deep and growing concerns about genetically engineered foods and livestock.

A growing body of literature is now sufficient to show that neither the FDA nor the EPA nor the scientists working for (or whose work is indirectly sponsored by) the multinational "life sciences" corporations have amassed scientific evidence through long-term studies to demonstrate the safety of the GEO material being sown, harvested and marketed, unlabeled, today. It is not tolerable that the burden of proof, *vis a vis* the potential harm to human health and the environment that these products and practices might cause, is left to consumers, particularly as the lack of labeling leaves us with no basis on which to launch claims.

Points of concern are many, but on the short list are the following worries: the possibility of mutation of GEO's has been ignored by those who make and produce them; GEO's could, especially in the variety and quantity being produced today, create new toxins, foster and increase antibiotic resistance, produce allergic reactions that cannot, especially without labelling, be averted in those who are susceptible, and pose severe risks to sustainable organic farming practices around the world through genetic drift.

Once these materials are released into the common ecosphere there is no recapturing or restraining the ways in which they will play out genetically, in their interactions with other plants and animals in the environment. Although the potential threats have been likened to those, in the 20th century, involved with nuclear energy, the latter at least allowed for underground storage of dangerous materials, albeit in leaky tanks, and storage that was localized, albeit in increasingly many sites around the globe. Such controls are impossible in the case of GEO's.

Technology is not science. Public health concerns are not automatically served by increased market share. We are not paying attention to those aspects of this putatively messianic thrust by Monsanto, Novartis, Dowe, GE, Dupont, ADM et al. that are absolutely crucial determinants of the safety of these global undertakings. Daily, I become more and more ashamed of the complicity I bear by way of my citizenship alone.

I ask for a moratorium on the marketing of all such foods, seeds and materials until their long-term effects on the environment can be determined. I do not accept the argument that these products are needed to "feed the world's poor." Sincerely,


Jennifer J. Roser C 627

00P-1211

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