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March 17, 2005

William Hawks, Undersecretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington DC 20250

RE: Pharmaceutical Rice in Missouri

Dear Mr. Hawks,

We are writing to request that the U.S. Department of Agriculture (USDA) reject three applications by Ventria Bioscience to grow genetically engineered, pharmaceutical-producing rice varieties in southeast Missouri this year (permit application numbers 04-302-01r, 04-309-01r and 05-004-01r).

Our reasons for this request are detailed in the enclosed briefing paper, *Pharmaceutical Rice in Missouri*. In brief:

- 1) Despite improvements in USDA regulation of pharmaceutical food crops over the past few years, such measures can only **reduce**, not **prevent**, contamination of the food supply with experimental plant-made pharmaceuticals. The proposed site of these trials – Scott County, Missouri – is on the northeastern edge of the country’s most productive rice-growing region, increasing the potential for contamination.
- 2) Ventria’s products are potentially hazardous to consumers and the environment because they have pharmaceutical and pesticidal properties, yet the proposed field trials have not been reviewed by the Food and Drug Administration or the Environmental Protection Agency. The environmental assessments of the proposed field trials conducted by USDA’s Animal and Plant Health Inspection Service (APHIS) are no substitute for a full environmental impact statement by USDA as well as formal reviews by FDA and EPA.
- 3) There is a *de facto* zero tolerance standard in place for plant-made pharmaceuticals in the food supply. Therefore, even low-level “adventitious presence” of these Ventria’s rice-grown pharmaceuticals in the food chain poses unacceptable regulatory and Please reject these applications in order to protect Missouri farmers, consumers, and the rice & food industries from harm.

We urge you to reject these applications in order to protect Missouri farmers, consumers, and the rice & food industries from harm. These permits could be granted as early as the end of March. Therefore, we would appreciate your prompt attention to this matter. Please let us know what you action you decide to take.

Sincerely yours,

Bill Freese
Research Analyst
Friends of the Earth

Joseph Mendelson,
Legal Director
Center for Food Safety

Kerry-Ann T. Powell
Staff Attorney
U.S. Public Interest Research
Group

cc: Fred Ferrell, Director, Missouri Department of Agriculture
Jay Nixon, Missouri State Attorney General
Matt Blunt, Governor, State of Missouri
Stuart Proctor, President & CEO, USA Rice Federation
Mark Nelson, Vice President, Scientific and Regulatory Affairs, Grocery
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Jeffrey Barach, Vice President, Special Projects, Scientific and Regulatory Affairs,
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