Independent Expert

Bruce M. Chassy

Professor Emeritus of Food Safety and Nutritional Sciences, Department of Food Science and Human Nutrition, University of Illinois at Urbana-Champaign

Bruce M. Chassy is a Professor Emeritus of Food Safety and Nutritional Sciences from the Department of Food Science and Human Nutrition at the University of Illinois at Urbana-Champaign. He served as the Assistant Dean for Science Communications in the College of Agricultural, Consumer and Environmental Sciences and was Head of the Department of Food Science and Human Nutrition at the University of Illinois from 1989 to 2000. Dr. Chassy completed his undergraduate training in Chemistry at San Diego State University and his Ph.D. in Biochemistry at Cornell University. He was a research chemist at the National Institutes for Health (NIH) from 1968-1989. Dr. Chassy was a Fulbright Distinguished Lecturer in Spain in 1994.

Dr. Chassy's research focused on the characterization and development of methods for the genetic manipulation of microorganisms used in food and dairy fermentations. His research experiences with the development of genetically modified microorganisms that are used in foods led him to an interest in food safety and the safety evaluation of "biotech foods." He maintains a website that explores the safety of GM foods at http://academicsreview.org.

From This Expert

Recently Answered Questions | **Studies & Articles**

Q: Whats the longest study done on how GMOs affect the longevity and overall health to human beings?

Posted On: Wednesday, 12/10/2014 12:52 am

Answered By: Bruce M. Chassy, Professor Emeritus of Food Safety and Nutritional Sciences, Department of Food Science and Human Nutrition, University of Illinois at Urbana-Champaign, Wednesday, 3/11/2015 5:56 pm

A: The first thing to point out is that almost no safety studies are done in humans. It's unethical to expose a human to an untested product of any kind, but more importantly, humans are just plain lousy experimental animals. We are genetically heterogeneous, we don't follow protocols well, we grow and reproduce slowly, experiments on humans would be very expensive, and as we age a high percentage of us develop one or more diseases of aging that would confound the results (i.e...

Continue Reading

From:	Chassy, Bruce
To:	Eric Sachs
Subject:	EPA letter
Date:	Tuesday, July 05, 2011 9:48:37 AM
Attachments:	NAS Addesses and affiliations final format.docx EPA response Final 7.5.11.bc.doc ATT00001..txt

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Eric

Just wanted you to know that the letter will go to EPA Administrator Jackson today over Nina Federoff's signature. Nina really picked up the ball and moved it down the field.

She has collected over 60 NAS signatures including Jim Watson and Günter Blobel. She wrote an editorial that she is trying to have placed in the NYT. And Nina, Bob Haselkorn and I have written an editorial for the FASEB journal.

I attach the final letter and signatory list (embargoed and for internal use only).

I for one am really pleased to see scientists speaking out this time before the train wreck happens

July 5, 2011

The Honorable Lisa P. Jackson
Administrator
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Jackson:

We, the undersigned members of the National Academy of Sciences, write today to voice our concern over the latest proposal from the U.S. Environmental Protection Agency (EPA) to further expand its regulatory coverage over transgenic crops in a way that cannot be justified on the basis of either scientific evidence or experience gained over the past several decades, both of which support the conclusion that molecular modification techniques are no more dangerous than any modification technique now in use. The increased regulatory burdens that would result from this expansion would impose steep barriers to scientific innovation and product development across all sectors of our economy and would not only fail to enhance safety, but would likely prolong reliance on less safe and obsolete practices.

Twenty-five years ago, on June 26, 1986, the Office of Science and Technology Policy (OSTP) put forth a policy statement that created a "Coordinated Framework for the Regulation of Biotechnology" in the United States. At the time the Coordinated Framework was articulated, a degree of caution seemed reasonable, while seeking to achieve "a balance between regulation adequate to ensure health and environmental safety while maintaining sufficient regulatory flexibility to avoid impeding the growth of an infant industry". At that time it was acknowledged that the framework should be "expected to evolve in accord with the experiences of the industry and the agencies, and, thus, modifications may need to be made".

Since then, extensive research, coupled with years of experience, led to the conclusion that there is no scientific basis to single out plants produced by transgene insertion for a special regulatory review, nor to distinguish these products from others on the basis of the process used to create them. There is now abundant evidence that the most appropriate regulatory approach would be to require review only of truly novel traits introduced into plants without regard to the methods used for their introduction. Yet the regulatory apparatus in the U.S. has increasingly moved in the opposite direction towards ever greater regulation and increased data requirements for transgenic plants, despite the abundant accumulation of data attesting to their safety.

The scientific community has a strong interest in keeping regulations science-based and commensurate with the risk of the products at issue. This past March, EPA announced in the Federal Register a draft proposed rule to codify data requirements for plant incorporated protectants (PIPs). This draft was forwarded by EPA to the U.S. Department of Agriculture (USDA), Department of Health and Human Services and Congress for review in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act. Based on initial reviews of that draft proposal and recent EPA actions associated with biotechnology-derived crops, it is clear that the Agency is departing from a science-based regulatory process, walking down a path towards one based on the controversial European "precautionary

principle" that goes beyond codifying data requirements for substances regulated as PIPs for the past 15 years.

We are particularly troubled by proposals to expand EPA's current oversight into areas such as virus resistance and weediness that have been adequately addressed by USDA since 1986. Already, EPA has expanded its oversight into virus resistance, which previously had been the purview of USDA's Animal and Plant Health Inspection Service (APHIS) and which EPA prudently proposed in 1994 to exempt from its regulations. With the draft proposed rules, EPA would further expand its regulations and data demands to other areas historically covered by USDA-APHIS without the slightest justification based on either data or experience.

It is most troubling that EPA is also proposing to increase its regulation to cover matters which are still not deemed to be threats even after years of study, such as potential gene transfer from plants to soil microorganisms. In other actions, EPA has expressed its right to regulate plants engineered for altered growth (e.g., by suppression of ethylene production), the same way it regulates synthetic plant growth regulators. The Agency does so based on a generous interpretation of the enabling legislation, despite the absence of any scientifically credible hazard.

Such an expansion in regulatory purview would reverse long established and highly successful policy under the Coordinated Framework. Such a shift would (1) create a duplicative regulatory system for very low risk products delivering substantial, demonstrated environmental benefits; (2) increase costs, reduce efficiency and prolong the review timelines thereby discouraging innovation; (3) dramatically increase the hurdles already facing academic institutions and companies attempting to improve so-called minor use or specialty crops through modern biotechnology; and (4) adversely impact trade in safe and wholesome commodities produced by U.S. growers because of the stigma attached to anything characterized as a "pesticide" — a regulatory label for DNA that is unique to the U.S. — and with no concomitant increase in product safety. In addition, any expansion in regulatory oversight not resulting from documented risk could have global ramifications, as policymakers in other countries routinely consider U.S. policymakers as leaders in the regulation of crops derived from biotechnology.

Indeed, it is astonishing that EPA would attempt such an expansion of its regulatory activity in this sphere. We now have more than 25 years of experience with biotechnology-derived crop plants. None of the hypothetical risks articulated at the dawn of this era has been realized and caused new environmental problems. On the contrary, billions upon billions of meals derived from these crops have been eaten by humans and livestock around the world with no ill effects. Moreover, environmental impacts of production agriculture and the carbon footprint of agriculture have been significantly reduced through the use of transgenic crops. At the same time, farmers have benefited economically, socially, and through improved health. These indisputable results make a compelling case that existing regulatory burdens should be reduced and refocused. There is absolutely no justification in either scientific data or experience for the regulatory expansion proposed by EPA.

Over the last two decades, advances in sequencing and genomic analysis have revealed that biotechnology is more precise and less disruptive to the genome than traditional plant breeding. In point of fact, recent genomic, proteomic and metabolomic comparisons of varieties bred through conventional and transgenic methods demonstrate that transgenic plants with incorporated novel traits more closely resemble the parental variety than do new varieties of the same plant produced by more

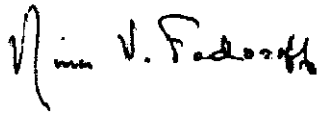
traditional breeding or mutagenesis techniques. These findings confirm that transgene insertion is not inherently risky nor does it present new and greater hazards than conventional plant breeding.

In conclusion, recent EPA actions signal an intent to expand the Agency's regulatory oversight into products regulated by USDA for over two decades and to products for which there has never been a justification for regulation. These actions are not only inconsistent with regulatory directives mandated by the current Administration, they also erode the integrity of the Coordinated Framework. Such expanded regulation would serve only to increase costs, hinder research, undermine the long-term viability of public university research programs, and limit product development from the private sector. The proposed actions would threaten our ability to produce high quality food at an affordable price and feed a growing population. They would also weaken the competitive advantage of U.S. public research programs in the global research arena, all with no increase in safety for consumers, farmers, or the environment — indeed, the contrary would be the case in many instances.

The academic community is committed to ensuring that the environmental and food safety benefits of biotechnology-derived plants continue to accrue, and it is essential that all agencies respect the scientific basis for regulation and division of regulatory responsibilities established by the Coordinated Framework. It is critical that regulations focus on scientifically demonstrated hazards, rather than being driven by issues of perception or political expediency. Therefore, Administrator Jackson, we urge you to reconsider the pending EPA regulatory actions and limit the rulemaking proposal to requirements for substances that have traditionally been regulated by EPA as PIPs, and then to only those requirements that are fully justified on the basis of safety and sound science.

I sign this letter on behalf of the more than 60 members of the U.S. National Academy of Sciences listed below. The list includes many of America' most eminent biological scientists, including Nobel Laureates Dr. James Watson and Dr. Günter Blobel.

Sincerely,



Dr. Nina V. Fedoroff
Member, National Academy of Sciences
2006 National Medal of Science Laureate
Science and Technology Adviser to the Secretary of State and to the Administrator of USAID, 2007-10
Evan Pugh Professor, Pennsylvania State University
Huck Institutes of the Life Sciences
211 Wartik
State College, PA 16801
nvf1@psu.edu

Richard Amasino
Professor, Department of Biochemistry
University of Wisconsin-Madison
Madison, WI

Charles J. Arntzen
Regents' Professor and Florence Ely Nelson Presidential Chair
The Biodesign Institute at Arizona State University
Tempe, AZ

Frederick M Ausubel
Professor of Genetics
Harvard Medical School and Massachusetts General Hospital
Boston, MA

Jeffrey Bennetzen
Giles Professor and Head of the Department of Genetics
University of Georgia
Athens, GA

Andrew A. Benson
Professor of Biology Emeritus
Scripps Institution of Oceanography
University of California - San Diego
San Diego, CA

Günter Blobel, MD
Professor of Cell Biology
The Rockefeller University
New York, NY

David Botstein
Lewis-Sigler Institute for Integrative Genomics
Princeton University
Princeton, NJ

John S. Boyer
E. I. du Pont Professor of Biochemistry/Biophysics Emeritus
Univ. of Delaware
Newark, DE

Steven Briggs
Distinguished Professor of Cell and Developmental Biology
University of California – San Diego
San Diego, CA

Donald Brown
Staff Member, Director Emeritus
Carnegie Institution for Science
Baltimore, MD

Bob Buchanan
Professor
University of California – Berkeley
Berkeley, CA

Vicki Chandler
Regent's Professor Emeritus
University of Arizona
Tucson, AZ

Joanne Chory
Professor, The Salk Institute
Director, Plant Biology Laboratory
Investigator, Howard Hughes Medical Institute
San Diego, CA

Rodney Croteau
Regents' Professor
Institute of Biological Chemistry
Washington State University
Pullman, WA

Eric Davidson
Norman Chandler Professor of Cell Biology
California Institute of Technology
Pasadena, CA

David Dilcher
Professor Emeritus Department of Biology
Indiana University
Bloomington, IN

John E. Dowling
Gund Professor of Neurosciences
Harvard University
Cambridge, MA

Dr. Stephen J. Elledge
Professor of Genetics
Department of Genetics
Harvard Medical School
Boston, MA

Stanley Fields
Professor
University of Washington
Seattle, WA

Michael Freeling
Professor of Genetics
University of California – Berkeley
Berkeley, CA

Dr. Elisabeth Gantt
Distinguished University Professor, Emerita
Dept. Cell Biology and Molecular Genetics
University of Maryland
College Park, MD

Martin Gellert
Bethesda, MD

Dr. Laurie H. Glimcher
Irene Heinz Given Professor of Immunology
Professor of Medicine, Harvard Medical School
Harvard School of Public Health
Boston, MA

Robert Goldberg
Distinguished Professor of Molecular, Cell, and Developmental Biology
University of California - Los Angeles (UCLA)
Los Angeles, CA

Bruce D. Hammock
Distinguished Professor of Entomology UCD &
Cancer Center UCD Medical Center
Director, NIEHS-UCD Superfund Basic Research Program
University of California- Davis
Davis, CA

Robert Haselkorn
Fanny L. Pritzker Distinguished Service Professor of Molecular Genetics & Cell Biology
The University of Chicago
Chicago, IL

J. Woodland Hastings
Paul C. Mangelsdorf Professor of Natural Sciences
Department of Molecular and Cellular Biology
Harvard University
Cambridge, MA

Donald R. Helinski
Professor Emeritus
Division of Biological Sciences
University of California - San Diego
San Diego, CA

Peter M. Howley, M.D.
Shattuck Professor of Pathological Anatomy
Harvard Medical School
Boston, MA

Andre Jagendorf
Liberty Hyde Bailey Professor Emeritus
Cornell University
Ithaca, NY

Cynthia Kenyon
Professor, Department of Biochemistry and Biophysics
University of California – San Francisco
San Francisco, CA

Judith Kimble
Vilas Professor, University of Wisconsin-Madison
Investigator, Howard Hughes Medical Institute
Madison, WI

Marc Kirschner
John Enders University Professor
Chair, Department of Systems Biology
Harvard University
Boston, MA

Todd R. Klaenhammer
Distinguished University Professor & William Neal Reynolds Professor
North Carolina State University
Raleigh, NC

Andrew H. Knoll
Fischer Professor of Natural History
Harvard University
Cambridge, MA

J. Clark Lagarias, Ph.D.
Professor of Biochemistry
University of California – Davis
Davis, CA

Steve Lindow
Professor of Plant Pathology
University of California - Berkeley
Berkeley, CA

Susan Lindquist
Professor of Biology, Massachusetts Institute of Technology
Investigator, Howard Hughes Medical Institute and Whitehead Institute for Biomedical Research
Boston, MA

Richard Losick
The Biological Laboratories
Harvard University
Cambridge, MA

Anthony P. Mahowald, Ph. D.
Louis Block Professor Emeritus
Department of Molecular Genetics and Cell Biology
The University of Chicago
Chicago, IL

Steven McKnight
Professor and Chairman
Department of Biochemistry
UT Southwestern Medical Center
Dallas, TX

John Mekalanos, Ph.D.
Professor and Chair, Department of Microbiology and Molecular Genetics
Harvard Medical School
Boston, MA

June B. Nasrallah
B McClintock Professorship
Cornell University
Ithaca, NY

Eugene Nester
Professor Emeritus
University of Washington
Seattle, WA

Eldon H. Newcomb
Folke Skoog Professor Emeritus
Department of Botany
University of Wisconsin - Madison
Madison, WI

Jeffrey Palmer
Dr. Jeffrey D. Palmer, Distinguished Professor of Biology and
Class of '55 Professor
Indiana University
Bloomington, IN

John T. Potts, Jr., MD
Jackson Distinguished Professor of Clinical Medicine
Director of Research and Physician-in-Chief Emeritus
Harvard Medical School, Massachusetts General Hospital
Boston, MA

Peter H. Raven
President Emeritus
Missouri Botanical Garden
St. Louis, MO

Michael Rosbash
Investigator Howard Hughes Medical Institute
Professor of Biology at Brandeis University
Waltham, MA

David D. Sabatini, M.D., Ph.D.
Frederick L. Ehrman Professor
Department of Cell Biology
NYU School of Medicine
New York, NY

Matthew Scott
Professor
Stanford University School of Medicine
Palo Alto, CA

Ron Sederoff
Distinguished University Professor
Edwin F. Conger Professor in the Department of Forestry and Environmental Resources
North Carolina State University
Raleigh, NC

Jonathan Seidman
Henrietta and Frederick Bugher Professor of Cardiovascular Genetics
Department of Genetics
Harvard Medical School
Boston, MA

Phillip A. Sharp
Institute Professor, Dept. of Biology
Massachusetts Institute of Technology
Cambridge, MA

Chris Somerville
Philomathia Professor of Alternative Energy
Director, Energy Biosciences Institute
University of California - Berkeley,
Berkeley, CA

Allan Spradling
Director, Department of Embryology
Carnegie Institution for Science
Washington, DC

Brian Staskawicz
Professor and Chair of Plant and Microbial Biology
University of California - Berkeley
Berkeley, CA

Kevin Struhl
David Wesley Gaiser Professor
Dept. Biological Chemistry and Molecular Pharmacology
Harvard Medical School
Boston, MA

Clifford J Tabin
George Jacob and Jacqueline Hazel Leder Professor and Chair
Department of Genetics
Harvard Medical School
Boston, MA

Michael Thomashow
University Distinguished Professor &
Director, MSU-DOE Plant Research Lab
Michigan State University
East Lansing, MI

Inder Verma
Irwin and Joan Jacobs Chair in Exemplary Life Science
American Cancer Society Professor of Molecular Biology
The Salk Institute, Laboratory of Genetics
La Jolla, CA

James D. Watson
Chancellor Emeritus
Cold Spring Harbor Laboratory
Cold Spring Harbor, NY

Diter von Wettsteinu
R.A.Nilan Distinguished Professor
Department of Crop and Soil Sciences & School of Molecular Biosciences
Washington State University
Pullman, WA

William B. Wood
Distinguished Professor, Emeritus
University of Colorado, Boulder
Boulder, CO

Patricia Zambryski
Professor, Department of Plant and Microbial Biology
University of California - Berkeley
Berkeley, CA

cc: Honorable Thomas J. Vilsack, Secretary, USDA
cc: Honorable Kathleen Sebelius, Secretary, HHS
cc: John P. Holdren, Assistant to the President for Science and Technology and Director, Office of Science and Technology Policy
cc: Cass R. Sunstein, Administrator, Office of Information and Regulatory Affairs, Office of Management and Budget
cc: Ambassador Islam A. Siddiqui, Chief Agricultural Negotiator, USTR
cc: Honorable Debbie Stabenow, Chairwoman, Committee on Agriculture, Nutrition and Forestry, U.S. Senate
cc: Honorable Pat Roberts, Ranking Member, Committee on Agriculture, Nutrition and Forestry, U.S. Senate
cc: Honorable Frank D. Lucas, Chairman, Committee on Agriculture, U.S. House of Representatives
cc: Honorable Collin C. Peterson, Ranking Member, Committee on Agriculture, U.S. House of Representatives

On Aug 3, 2011, at 8:40 AM, SACHS, ERIC S (AG/1000) wrote:

Bruce,
Has there been any response from EPA to the letter from Nina and NAS scientists?
If not, have you considered whether there may be value to follow up?

Have you considered having a small group of scientists request a meeting with Lisa Jackson?

Is there a coordinated plan to maintain pressure and emphasis on EPA's evolving

regulations?

It could be important to send a clear message that the scientific community is very serious about driving toward more rational, justifiable and codified regulatory requirements that enable innovation and product development for public good.

Just some thoughts….

Regards,
Eric

From: Chassy, Bruce
To: Stanley Abramson
Subject: Fwd: EPA Letter and Follow Up
Date: Wednesday, August 03, 2011 1:18:10 PM

I responded to Eric's e-mail and neglected to copy you -- sorry -- it's below

I do think that we need to continue to be proactive. A visit is one possibility but is hard to orchestrate and will take some support.

We have also talked about another letter signed by hundreds of scientists that suggests that the EPA ratchet down their regulations not expand them

what else? Should we be making additional plans? I assume that at the level of BIO or CropLife there is still some sort of multi-prongged approach.

Bruce

Begin forwarded message:

> **From:** "Chassy, Bruce" <bchassy@uiuc.edu>
> **Date:** August 3, 2011 11:07:05 AM PDT
> **To:** "SACHS, ERIC S (AG/1000)" <eric.s.sachs@monsanto.com>
> **Subject: Re: EPA Letter and Follow Up**
>
> Eric
>
> No response of which I am aware. We have talked about follow up and next steps but were waiting for two things: 1) Nina to get a letter published in the NYT which she has been told would happen but never happens, and 2) for the August 4 House Subcomm on Rural Development, Research, Biotechnology, and Foreign Agriculture hearing to review the causes and consequences of government over-regulation of agricultural biotechnology to occur. Congress has now recessed and the hearing has been cancelled so we are without plan.
>
> The debt ceiling debacle seems to have drawn 99% of the media attention lately. Glad that's over.
>
> Your thoughts are appreciated. No, we had not considered meeting with Lisa Jackson lately. It came up early on as an alternative to the letter and/or a way to deliver the letter. There was no way to get well-known leading scientists together on short notice so we passed on that idea. Fact is it's hard to get them on any kind of notice. We would want to send people like Nina and Roger. It's a good idea but a tough one to pull off.
>
> The total lack of response may signal EPA's intent to back off and lay low for a while. I seriously doubt that they are capable of honestly

reconsidering their proposal but they might go under cover until they think the heat is off. Thus your suggestion about finding a way to maintain pressure is well taken.

Let me think about it some more and get back to you.

Regards

Bruce

On Aug 3, 2011, at 8:40 AM, SACHS, ERIC S (AG/1000) wrote:

> Bruce,
> Has there been any response from EPA to the letter from Nina and NAS scientists? If not, have you considered whether there may be value to follow up?
>
> Have you considered having a small group of scientists request a meeting with Lisa Jackson?
>
> Is there a coordinated plan to maintain pressure and emphasis on EPA's evolving regulations?
>
> It could be important to send a clear message that the scientific community is very serious about driving toward more rational, justifiable and codified regulatory requirements that enable innovation and product development for public good.
>
> Just some thoughts….
>
> Regards,
> Eric

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 18 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Dr. Nina V. Fedoroff
Pennsylvania State University
Huck Institutes of Life Sciences
211 Wartik
University Park, Pennsylvania 16802

Dear Dr. Fedoroff:

Thank you for your letter of July 5, 2011, to Environmental Protection Agency Administrator Lisa Jackson, in which you and other members of the scientific community express concern about a proposed rule under development at EPA on Plant-Incorporated Protectants. Administrator Jackson asked me to respond on behalf of the agency because my office is responsible for the regulation of pesticides in the United States.

EPA is committed to regulatory oversight that protects human health and the environment while permitting pesticide use that is beneficial to society. Part of this commitment is to codify data requirements that specifically address the data to support scientific evaluation of PIPs. These data requirements would provide EPA with the information necessary for the registration of a PIP or the issuance of an experimental use permit for a PIP. In addition, they would improve the agency's ability to make regulatory decisions about the human health and environmental effects of these products. By codifying data requirements specific to PIPs, the regulated community would have a better understanding of and could better prepare for the PIP registration process.

The proposed rule referred to in your letter is still under development. The agency is coordinating with our federal partners, and we expect the proposed rule to publish in the *Federal Register* in 2012 for public comment. It will also be posted on our PIPs website at: http://www.epa.gov/oppbppd1/biopesticides/pips/index.htm. We invite you to submit comments to the public docket at that time.

To ensure you have current information on the publication of the proposed rule and the opening of the public comment period in a timely manner, you may wish to join the Office of Pesticide Programs' listserv to receive updates on regulatory decisions, press announcements and other pesticide-related information. To do so, visit: http://www.epa.gov/oppfead1/cb/csb_page/form/form.html.

Again, thank you for your letter. If you have further questions, please contact me or you may call Ms. Rose Kyprianou of my staff at (703) 564-5354.

Sincerely,

Steven P. Bradbury, Ph.D., Director
Office of Pesticide Programs

From: Chassy, Bruce
To: Eric Sachs
Subject: Fwd: Nina and EPA Letter
Date: Wednesday, August 24, 2011 10:17:46 AM

Eric

sorry if this is a resend. i sent it a few minutes ago but it doesn't show up in my out box.

bruce

Begin forwarded message:

> **From:** Bruce Chassy <[redacted]>
> **Subject: Re: Nina and EPA Letter**
> **Date:** August 24, 2011 10:05:29 AM CDT
> **To:** "SACHS, ERIC S (AG/1000)" <eric.s.sachs@monsanto.com>
>
> Eric
>
> I have spoken with NIna and she is completely on board to:
>
> 1. Visit Jackson
> 2. Meet with OSTP
> 3. Talk to the lobbyist whose name you were going to send me
> 4. Have a conference call with BIO
>
> She got a response from EPA that is an insult. See attached. For your eyes only because I didn't ask Nina if she's circulating it yet. I did suggest that she send it to co-signatories. One issue to be discussed on a call will be whether she should release her letter and the EPA response publicly. I suggested a title like "Being Stonewalled by the EPA while Obama promises to Streamline Regulations"
>
> I am going to e-mail and call Stan and Adrianne to discuss the above 4 points. Will also send them the letter from EPA.
>
> Regards
>
> Bruce
>
> On Aug 23, 2011, at 1:02 PM, SACHS, ERIC S (AG/1000) wrote:
>
> > Bruce – are you available to talk today? We can have a richer discussion over the phone. If not today, please suggest a time.
> > Eric

From: Chassy, Bruce
To: SACHS, ERIC S (AG/1000)
Subject: Re: Nina and EPA Letter
Date: Wednesday, August 24, 2011 10:42:00 AM

---

thanks
On Aug 24, 2011, at 10:40 AM, SACHS, ERIC S (AG/1000) wrote:

> His name is Marshall Matz. He was the Lead of the Obama transition team on agricultural matters.
> Eric

From: Chassy, Bruce [mailto:bchassy@uiuc.edu]
Sent: Wednesday, August 24, 2011 10:31 AM
To: SACHS, ERIC S [AG/1000]
Subject: Re: Nina and EPA Letter

I just wrote both of them and asked about lobbying but did not mention needing the name

will ask directly

bruce

On Aug 24, 2011, at 10:28 AM, SACHS, ERIC S (AG/1000) wrote:

> Received. I will obtain the name of the lobbyist though you can get it from Adrianne or Stan as well.
> Eric

From: Chassy, Bruce [mailto:bchassy@uiuc.edu]
Sent: Wednesday, August 24, 2011 10:18 AM
To: SACHS, ERIC S [AG/1000]
Subject: Fwd: Nina and EPA Letter

Eric

sorry if this is a resend. i sent it a few minutes ago but it doesn't show up in my out box.

bruce

Begin forwarded message:

From: Bruce Chassy [redacted]>

From:	Chassy, Bruce
To:	Martina (E-mail); Wayne Parrott; Stanley Abramson; ninafedoroff; Eric Sachs; Jim Gaffney; Philip D. Harvey; Adrianne Massey
Subject:	Conference Call Number for Friday
Date:	Saturday, August 27, 2011 6:27:14 PM

Hi All

Stan has kindly set up a conference call for us.

Call-in number: [redacted]
Passcode:

Time 4:30PM EDT (3:30 CDT, 1:30 PDT) Friday, Sept. 2

Bruce

From: Chassy, Bruce
To: Eric Sachs
Subject: Questions
Date: Monday, August 29, 2011 4:49:41 PM

Hi Eric

As you saw, I am trying to move the call back one hour. So far looking ok to move.

I have a question about timing of the potential Taiwan trip. I know you are only forwarding a name but when exactly was that going to take place? I ask because [redacted]

While I am at it, another question.

I have been invited to give a talk at the International Conference on Plant Biotechnology for Food Security: New Frontiers 2012 New Delhi Feb. 21-24, 2012. Looks like a good meeting and I know the organizers (letter came from Ananda Kumar). I am pretty sure they won't pay business class fare and I have no desire to sit in a plane for 17 hrs from ORD to DEL in economy. I also can't pay business class from my funding, period no way. The question is do you know who at Crop Life I should speak to about sponsoring me? Maybe do some other talks while I am there. I have not had a recent opportunity to fight the eggplant wars. Any other ideas are welcome. I know you can't send me either so that's not why I'm asking.

http://www.spbbindia.org

Regards

Bruce

Bruce Chassy, PhD
Professor of Food Safety
Professor or Nutritional Sciences
FSHN, University of Illinois
1101 West Peabody, 40 NSRC
Urbana, IL 61801
217-244-7291

From:	Chassy, Bruce
To:	Martina (E-mail); Wayne Parrott; Stanley Abramson; ninafedoroff; Eric Sachs; Jim Gaffney; Philip D. Harvey; Adrianne Massey
Subject:	Conference Call
Date:	Monday, August 29, 2011 3:50:06 PM
Attachments:	Sunstein WSJ 08_23_11.pdf ATT00001..htm BIO letter EPA Scope Expansion.pdf ATT00002..htm NAS Members Letter to EPA - FINAL (7-5-11)-1.pdf ATT00003..htm Genetically Engineered Food for All - NYTimes.com.pdf ATT00004..htm EPA Federoff response.pdf ATT00005..htm

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Colleagues:

Would there be any objection to moving the conference call back (delaying) one hour? That would be 5PM EDT.

I have attached the following background material for our call on Friday:

1. NAS members letter to EPA
2. The EPA response letter
3. BIO letter to EPA
4. NIna Federoff Letter in NYT
5. Federoff et al. in FASEB Journal (to follow, PDF not available yet)
6. WSJ article by Cass Sunstein about "Eliminating Washington Red Tape"

See also:

http://www.feedstuffs.com/ME2/dirmod.asp?sid=49804C6972614A63A1A10DF54CD95D65&nm=Search+our+Archives&type=Publishing&mod=Publications%3A%3AArticle&mid=AA01E1C62E954234AA0052ECD5818EF4&tier=4&id=DBDDF7EC97FD43F58861553B088CE6B2

An agenda will follow later in the week. That said, the overarching agenda issue is what should industry, academe, BIO and interested members of civil society do next to encourage EPA to reduce rather than expand regulation of biotech crops? What are each sectors interests in the pending rule-changes are how do they differ/overlap? How can we help one another articulate a clear and consistent message and to whom and how should we be delivering that message? Which are the key messages to stress?

Regards

From:	Chassy, Bruce
To:	Martina (E-mail); Wayne Parrott; Stanley Abramson; ninafedoroff Fedoroff; Eric Sachs; Jim Gaffney; Philip D. Harvey; Adrianne Massey
Subject:	Friday Conf Call Time Moved to 5PM EDT
Date:	Thursday, September 01, 2011 10:28:52 AM
Attachments:	EPA Deaf Ear Federoff et al 2011.pdf ATT00001..htm

---

Colleagues:

The conference call tomorrow, Friday Sept. 2 will begin at 5:00PM EDT (4:00PM CDT, 2 PM PDT).

The dial-in and pass codes are:

Call-in:
Passcode [redacted]

Participants:

Stanley Abramson
Bruce Chassy
Nina Federoff
Jim Gaffney
Phillip Harvey
Adrianne Massey (may not be able to attend)
Martina McGloughlin
Wayne Parrott
Eric Sachs

Tentative Agenda

1. Introductions. Everyone will be asked to give a brief introduction that describes their interest in the proposed EPA rule changes.

2. Review of what EPA is proposing to do, the process to be followed, and the timeline. Stan Abramson

3. Discussion of the academic response to the EPA draft document. Chassy and Federoff.

Letter to EPA signed by NAS members
NYT Editorial
FASEB Journal editorial (Federoff, Haselkorn and Chassy. EPA Turns a Deaf Ear to Science. http://www.fasebj.org/content/25/9/2855.full.pdf+html, PDF attached)
EPA response letter
Questions for discussion
Should the NAS letter be more widely publicized? If so, how?
Should the names of the NAS co-signatories be released?
Should the EPA response be published?
Should a committee of NAS members request a meeting with Administrator Jackson? Other EPA staff? Other organizations?

What other next steps might the science and academic communities take to advance this issue? How to organize?

4. Discussion of the BIO and Industry Response

The BIO letter to NAS (Stan Abramson and Adrianne Massey)

Next steps?

5. Who will represent civil society and how are their interests the same or different? (NGOs, Foundations, NG- research institutes). Phil Harvey and others

6. Identification of key issues and messages

Not-science based; regulation should be commensurate with real risk

Is inconsistent with the administrations claim that they are simplifying and reducing regulatory hurdles

Raises a barrier to new developments to all but large multi-national corporations -- locks out academic scientists

Gives an advantage to scientists and developers in other countries (for example Brazil)

Inhibits the introduction of technologies that will add to the productivity and sustainability of agriculture

Contributes to higher cost of foods and feeds and stifles attempts to reduce hunger

Reduces US competitiveness

EPA wants this issue to go away, how do we promise them that we will continue to keep the heat on and make it even more public?

Others?

7. Brainstorming about other possible next steps

Congress and lobbying? To who and by whom?

Organizing a larger group of researchers? To do what?

8. Coordinating and communicating. Should we continue to meet regularly? How else might we stay in touch and support one another's efforts?

From: Chassy, Bruce
To: Stan Abramson; Adrianne Massey; Eric Sachs; Jim Gaffney
Subject: NIna
Date: Monday, September 26, 2011 6:05:30 PM

Hi All,

I just wanted to let you know that Nina fells that since she will be in Saudi Arabia most of the time for the foreseeable future she is not the person to lead in Washington DC. She has recruited Roger Beachey in her place. She is most emphatically not quitting the effort. Roger has agreed to lead the effort to arrange a meeting with Lisa Jackson and others in DC by asking prominent scientists that we have identified. IF Nina can be there when a meeting can be scheduled, she will join the delegation but she felt her few and narrow windows were going to hamper the effort. I will be contacting Roger and moving forward with this initiative. You should continue to copy Nina and add Roger to our dialog.

Regards

Bruce

From: Chassy, Bruce
To: SACHS, ERIC S (AG/1000)
Subject: Re: Question
Date: Monday, October 17, 2011 2:38:28 PM

Eric

[redacted]

Best

Bruce

On Oct 17, 2011, at 2:34 PM, SACHS, ERIC S (AG/1000) wrote:

> Bruce- I am interested in hearing about the meeting. It will have to wait a day or so. [redacted]
>
>
> ----- Original Message -----
> From: Chassy, Bruce [mailto:bchassy@uiuc.edu]
> Sent: Monday, October 17, 2011 01:18 PM
> To: SACHS, ERIC S [AG/1000]
> Subject: Re: Question
>
> thanks
>
> I went to DC this weekend and Nina Fedoroff and I met with Steve Bradbury of EPA -- the one who sent the non-responsive letter to the NAS members letter. Stan Abramson and Adrianne Massey set up the meeting. It was very surprisingly productive. If you're interested in hearing more we can talk about it.
>
> regards
>
> bruce
>
> On Oct 17, 2011, at 1:13 PM, SACHS, ERIC S (AG/1000) wrote:
>
>> Bruce- I forgot to check. I am sending your inquiry to my assistant Sheryl to follow up. If it didn't happen, I will make a gift to the foundation right away.
>>
>>
>> ----- Original Message -----
>> From: Chassy, Bruce [mailto:bchassy@uiuc.edu]
>> Sent: Monday, October 17, 2011 12:36 PM
>> To: SACHS, ERIC S [AG/1000]
>> Subject: Question
>>
>> Eric
>>
>> Were you able to find out if you made a contribution to the U of I Foundation Biotech fund in August. It does not show up yet on my account but that does not mean that you didn't send it. As you recall, sometimes I need to track down where the checks have gone….
>>
>> Regards
>>

From: Chassy, Bruce
To: EVERTOWSKI, SHERYL F (AG/1000)
Subject: Re: Question
Date: Wednesday, October 19, 2011 2:43:10 PM

Sheryl,

Yes that is the correct address and person.

Dr. Dong is Professor and Head, Dept. of Food Science and Human Nutrition. A letter should be enclosed that says the enclosed check is an unrestricted gift payable to the University of Illinois Foundation in support of the biotechnology outreach and education activities of Professor Bruce M. Chassy.

Thanks

Bruce

On Oct 19, 2011, at 1:58 PM, EVERTOWSKI, SHERYL F (AG/1000) wrote:

> I now support Eric and would just like to confirm the address to mail this check....in files from Larry there is an email to send the checks to Dr. Faye Dong, FSHN, 260 Bevier Hall, 905 South Goodwin, Urbana, IL 61801.
>
> Is that still correct?
>
> Thank you....I will get this in process right away.
>
>
>
> Sheryl
> Sheryl Evertowski, CPS/CAP
> Administrative Assistant
> Global Regulatory Policy &
> Scientific Affairs
> 314-694-4565
> Fax: 314-694-2074
>
>
>
> -----Original Message-----
> From: SACHS, ERIC S [AG/1000]
> Sent: Monday, October 17, 2011 1:14 PM
> To: 'bchassy@uiuc.edu'
> Cc: EVERTOWSKI, SHERYL F [AG/1000]
> Subject: Re: Question
>
> Bruce- I forgot to check. I am sending your inquiry to my assistant Sheryl to follow up. If it didn't happen, I will make a gift to the foundation right away.
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> ----- Original Message -----
> From: Chassy, Bruce [mailto:bchassy@uiuc.edu]
> Sent: Monday, October 17, 2011 12:36 PM
> To: SACHS, ERIC S [AG/1000]

> Subject: Question
>
> Eric
>
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> Regards
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> Is that still correct?
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> Sheryl Evertowski, CPS/CAP
> Administrative Assistant
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> From: SACHS, ERIC S [AG/1000]
> Sent: Monday, October 17, 2011 1:14 PM
> To: 'bchassy@uiuc.edu'
> Cc: EVERTOWSKI, SHERYL F [AG/1000]
> Subject: Re: Question
>
> Bruce- I forgot to check. I am sending your inquiry to my assistant Sheryl to follow up. If it didn't happen, I will make a gift to the foundation right away.
>
>
> ----- Original Message -----
> From: Chassy, Bruce [mailto:bchassy@uiuc.edu]
> Sent: Monday, October 17, 2011 12:36 PM
> To: SACHS, ERIC S [AG/1000]

From: Chassy, Bruce
To: SACHS, ERIC S (AG/1000)
Subject: Re: Question
Date: Thursday, October 20, 2011 9:44:02 AM

Eric

Sorry about 8AM. I had a doctors appt and ran out of the house early.

Let me know the next time slot that you have available.

Bruce

On Oct 19, 2011, at 11:17 PM, SACHS, ERIC S (AG/1000) wrote:

> Bruce - I am free at 8:00am tomorrow and would love to hear more about your meeting with Bradbury. Is this a good time to call you?
> Eric
>
> -----Original Message-----
> From: Chassy, Bruce [mailto:bchassy@uiuc.edu]
> Sent: Monday, October 17, 2011 1:19 PM
> To: SACHS, ERIC S [AG/1000]
> Subject: Re: Question
>
> thanks
>
> I went to DC this weekend and Nina Fedoroff and I met with Steve Bradbury of EPA -- the one who sent the non-responsive letter to the NAS members letter. Stan Abramson and Adrianne Massey set up the meeting. It was very surprisingly productive. If you're interested in hearing more we can talk about it.
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>> Bruce- I forgot to check. I am sending your inquiry to my assistant Sheryl to follow up. If it didn't happen, I will make a gift to the foundation right away.
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>> ----- Original Message -----
>> From: Chassy, Bruce [mailto:bchassy@uiuc.edu]
>> Sent: Monday, October 17, 2011 12:36 PM
>> To: SACHS, ERIC S [AG/1000]
>> Subject: Question
>>
>> Eric
>>
>> Were you able to find out if you made a contribution to the U of I Foundation Biotech fund in August. It does not show up yet on my account but that does not mean that you didn't send it. As you recall, sometimes I need to track down where the checks have gone....
>>
>> Regards
>>

From: Chassy, Bruce M
To: SACHS, ERIC S (AG/1000)
Subject: Re: EPA and Outreach on Draft Rule
Date: Thursday, January 05, 2012 4:44:51 PM

Eric

In a word no. Not much doing over the holidays.

I floated a petition in support of UK scientists' petition in support of the Swedish scientists' declaration a couple of months ago but nobody seemed to have the time or interest to edit it or respond to me about it. Maybe they didn't like the idea.

I am meeting with Stan Abramson on Saturday in DC and we will discuss next steps.

Happy New Year

Bruce

On Jan 5, 2012, at 10:31 AM, SACHS, ERIC S (AG/1000) wrote:

> Hi Bruce – are there any recent or new activities planned by the public sector group to continue pressure on EPA?
> Eric

From: Chassy, Bruce M
To: SACHS, ERIC S (AG/1000)
Subject: Re: A little more blog help
Date: Monday, April 30, 2012 3:32:26 PM

Eric

Thanks. You would get a chuckle out of the people this guy said were part of the revolving door: Donald Rumsfeld, Val Giddings, Tommy Thompson, Clint Yuetter, etc I could go on....

Bruce

On Apr 30, 2012, at 3:06 PM, SACHS, ERIC S (AG/1000) wrote:

> Bruce – perhaps this helps. Tom sent the actual 1994 guidelines and they differ in important ways from what your "nemesis" has stated. Take a look at the link below.
> Eric
>
> ---
>
> **From:** HELSCHER, THOMAS M [AG/1000]
> **Sent:** Monday, April 30, 2012 2:46 PM
> **To:** SACHS, ERIC S [AG/1000]
> **Subject:** RE: A little more blog help
>
> Taylor was the Deputy Commissioner for Policy in 1994 and his name was on the guidelines published in the Federal Register. See http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/FoodLabelingNutrition/ucm059036.htm
>
> ---
>
> > **From:** SACHS, ERIC S [AG/1000]
> > **Sent:** Monday, April 30, 2012 2:26 PM
> > **To:** HELSCHER, THOMAS M [AG/1000]
> > **Subject:** FW: A little more blog help
> >
> > Tom – please see Bruce Chassy's comments below. He engaged on the Huffington Post blog at my request and has been battling statements from an opponent about "revolving door" concerns. Can you provide information to help Bruce respond to the latest allegation involving Michael Taylor?
> > Eric
> >
> > ---
> >
> > **From:** Chassy, Bruce M [mailto:bchassy@illinois.edu]
> > **Sent:** Monday, April 30, 2012 2:23 PM
> > **To:** SACHS, ERIC S [AG/1000]
> > **Subject:** A little more blog help
> >
> > Hi Eric
> >
> > I am continuing to have comments made to the Huffington article blog. There is some guy sitting on the posts to that article reacting to every comment I make. Both of us have too much to do to respond to every post

but I want to make a couple of more comments.

I seem to recall that you have an assistant who was recently added. If they are still around maybe I could take this sort of stuff directly to them unless you want to see it. Let me know.

Anyway, the comment in question involves Michael Taylor's role at FDA. Here's the posting in question. And my question is, did Michael Taylor write the FDA rBST labeling policy?

> *"And the record clearly shows that Taylor has recused himself from every discussion or decision that even remotely relates to Monsanto products."*
>
> *Wrong.*
>
> *He wrote the FDA's rBGH labelling guidelines. The guidelines, announced in February 1994, virtually prohibited dairy corporations from making any real distinction between products produced with and without rBGH. To keep rBGH-milk from being "stigmatized" in the marketplace, the FDA announced that labels on non-rBGH products must state that there is no difference between rBGH and the naturally occurring hormone. In 1994, Taylor was publicly exposed as a former lawyer for the Monsanto corporation for seven years. While working for Monsanto, Taylor had prepared a memo for the company as to whether or not it would be constitutional for states to erect labelling laws concerning rBGH dairy products. In other words. Taylor helped Monsanto figure out whether or not the corporation could sue states or companies that wanted to tell the public that their products were free of Monsanto's drug.*

This would be fun if I had nothing better to do...

Thanks

Bruce

From: Chassy, Bruce M
To: HAMMOND, BRUCE G (AG/1000)
Subject: RE: EFSA Highlights
Date: Wednesday, May 02, 2012 11:45:28 AM

Bruce

the answer is yes we could work something out like this, but its a little more complicated

it might be better if we talked so i can explain my left hand is in a splint and keyboarding is literally a pain

when is a good time for you to talk?

bruce

_____

From: HAMMOND, BRUCE G (AG/1000) [bruce g hammond@monsanto com]
Sent: Wednesday, May 02, 2012 10:24 AM
To: Chassy, Bruce M; VICINI, JOHN L (AG/1000)
Cc: SACHS, ERIC S (AG/1000); Wayne Parrott; GLENN, KEVIN C (AG/1000); LEMKE, SHAWNA LIN (AG/1000)
Subject: RE: EFSA Highlights

Monsanto recently provided a grant to the Univ of Illinois to support agricultural communication based on the press release below I wonder if something similar to this could be done for YouTube or other kinds of electronic outreach on GM safety, given the initiative in California to require labeling of foods containing GM crops

Monsanto has pledged a $250,000 grant to the University of Illinois to be put toward an initiative between the College of Agricultural, Consumer and Environmental Sciences (ACES) and the College of Media, it was announced today

The grant will help establish an Agricultural Communications Program endowed chair that will strengthen communications for agricultural and rural development

"With the population expecting to reach 9 billion by 2030, Monsanto is doing its part by offering technology that will produce more crops per acre using fewer resources," said Tami Craig-Schilling<http://connection monsanto com/mymonsanto/person aspx?guid=EAA57F88-7824-4509-AB34-8FC57A794A99>, Technology Communications lead "Effectively communicating farmers' efforts to feed a rapidly growing population is another important part of the solution "

The James F Evans Endowed Chair in Agricultural Communications will provide leadership for the joint program between the College of ACES and the College of Media by serving current and future agricultural communicators through courses, service initiatives, research and relationship building

"We appreciate Monsanto's support in this effort," said College of ACES Dean Robert Hauser "It would not be possible without the generosity of Monsanto and others who recognize the importance of informing students, the private sector, policy makers, and the public in general – here and worldwide – about the role of agriculture in addressing many of society's most pressing issues "

Craig-Schilling stressed the value of improving ag communication

"The rising importance of new media channels combined with the rapidly changing agriculture landscape indicates it is more important than ever that we talk about ag in an effective way," said Craig-Schilling "University of Illinois is taking a positive step toward strengthening an already strong program and helping all those in agriculture become better communicators "

Monsanto and the University of Illinois have a long history of collaboration on efforts to advance learning and research in agriculture Most recently Monsanto funded eight Monsanto Fellows in Plant Breeding representing support of 500,000

From: Chassy, Bruce M [mailto:bchassy@illinois edu]
Sent: Tuesday, April 24, 2012 8:41 PM
To: VICINI, JOHN L [AG/1000]
Cc: HAMMOND, BRUCE G [AG/1000]; SACHS, ERIC S [AG/1000]; Wayne Parrott; Genevieve Bondy; Bartholomaeus, Andrew; Kate Walker; GLENN, KEVIN C [AG/1000]; LEMKE, SHAWNA LIN [AG/1000]
Subject: Re: EFSA Highlights

John

Our YouTubes are a few minutes long (it varies) and are intended for lay audiences Definitely not what you are needing We did use experts, however, who could deliver 1 hr talks if we let them

Bruce
On Apr 24, 2012, at 8:34 PM, VICINI, JOHN L (AG/1000) wrote:

Bruce C

Bruce H and I were talking yesterday about some seminars he is orchestrating that are being videoed They are essentially 1 hr academic level seminars I was wondering how long and at what level are your You Tube videos?

John

From: Chassy, Bruce M
To: Eric Sachs
Subject: Question
Date: Thursday, May 31, 2012 2:25:30 PM

Hi Eric

I hate to ask but is there any way to find out if a check was issued to U of I for me?

I don't see it in my account yet and I am trying to do a yearend close-out as I leave town.

Bruce

From: Chassy, Bruce M
To: SACHS, ERIC S (AG/1000)
Subject: Re: AMERICAN MEDICAL ASSOCIATION CONSIDERS LABELS ON GENETICALLY ENGINEERED FOOD
Date: Friday, June 08, 2012 12:00:54 AM

Stan

I would have liked talking to the AMA, maybe we can find another venue.

Alison Van Eenennaam has worked up a some good comments on labeling.

I think we need to look for an MD of some stature in research who's willing to do this. Am looking.

Bruce

On Jun 7, 2012, at 5:08 PM, SACHS, ERIC S (AG/1000) wrote:

> Hi Bruce – Are you aware that opponents of GM crops are pressing later this month in Chicago for an AMA resolution supporting labeling of GE foods? I don't know what you are doing on June 17 (Father's Day!) but I wonder whether someone like you should testify in support of GM crops and in opposition to mandatory labeling of GE foods. I am working this issue and am trying to identify persons that could travel to Chicago and counter the misinformation from Fagan, Hansen, etc. Please let me know your thoughts. What other persons do you feel should be supported to attend?
>
> Note that the "battle" has been around AMA for some time. The official positions taken by the AMA Council on Science and Public Health (last week) and previously by the AMA Council on Scientific Affairs conclude there is no scientific evidence to require labeling of GE foods. The opponent groups are bent on challenging these positions and on convincing delegates to vote for labeling based on consumer interests rather than on scientific evidence. Personally, I think this is a very important distinction and that AMA should stay firmly on scientific grounds.
>
> Dan Goldstein is planning to attend and testify as an MD and Monsanto scientist but we both believe that a couple of additional persons are appropriate to counter the voices of the opponents.
>
> Regards,
> Eric
>
> AMERICAN MEDICAL ASSOCIATION CONSIDERS LABELS ON GENETICALLY ENGINEERED FOOD
>
> Fairfield, IA - May 27, 2012-The Indiana State Medical Association and the Illinois State Medical Society have both introduced resolutions to the American Medical Association supporting Federal legislation and/or regulations to require labeling of food with genetically engineered ingredients [1] The Reference Committee for Science and Technology is accepting comments from AMA

membership until June 3 prior to hearing testimony at the House of Delegate's annual meeting in Chicago June 17.

Resolution #508 A-11, introduced by the Illinois Delegation, asks that the AMA study the impact of food containing genetically engineered ingredients and take further action based on the results of the study. Resolution 509-A-11, introduced by the Indiana Delegation, asks that the AMA study the impact of mandated labeling of food containing genetically engineered ingredients and take further action based on the results of the study. Both resolutions were referred at the 2011 annual meeting to the AMA Council on Science and Public Health, which released its report last week. [2]

Dr. John Fagan, who plans to testify on behalf of the Indiana State Medical Association, cautions: "There is a vital need for more emphasis on the role of independent research in regulatory decision making and public health policy." A Cornell University Ph.D. who spent seven years doing research in high-profile laboratories at the National Cancer Institute, Fagan returned a $614,000 grant to the National Institutes of Health in an ethical stand against genetic engineering - protesting what he saw as "rampant and unwise genetic tinkering with plants and animals."[3]

"There has been global agreement that genetically engineered foods are different than conventionally bred foods," states Dr. Michael Hansen, Senior Scientist for Consumer Reports, in a March report submitted to the AMA Council on Science and Public Health. [4] Hansen testified before the Indiana State Medical Association when the resolution passed the Indiana House of Delegates in 2011.

Codex Alimentarius, the food safety standards organization of the United Nations adopted 2011 guidelines recommending all genetically engineered foods to go through a safety assessment prior to approval. [5] Currently, companies that sell genetically engineered foods in the U.S. are not required by Food and Drug Administration to conduct thorough health studies before putting their products on the market.

"Tracking the millions of people with vulnerable immune systems and their reaction to novel proteins and virus fragments in genetically engineered food is impossible without food labeling," warns Dr. Martha Herbert, a pediatric neurologist and past vice-chair of the Council on Responsible Genetics. [6]

The American Public Health Association, [7] the American Nurses Association, [8] the Illinois Public Health Association, [9] and the California State Medical Association [10] have already passed resolutions calling for labeling of genetically engineered food.

[1.] http://www.ama-assn.org/assets/meeting/2011a/tab-ref-comm-e-addendum.pdf <http://r20.rs6.net/tn.jsp?e=0017il--_V34jkgtjlzL9KI-2epPKUWOcorhLZX33wUfytZZ_J7kYOY8qaxIkWh47X5gg7rUHzlBwrj8zDc3WA4o180T0X320J8D0yJazWFZcii4O1l_JuqqEQaP5XVM1dy1pcv8H0gRDeVAUfHYibtgqFnO7U4p8QhSl5zAXv-QlqDHc_ECRTFHJVQbHGcsTyRKXuBvz1wKrFBfWJGu9F1KFZxXvVx1wk0kMqhaDk2zU423MIVAYLgjpzNTJJJaeRa0OsV4Y07qUQ4MWn543td-SxEHUE7SlegzxS8SjOKt8V4o4nLY8CBxfvtlqey4l0nB3CyVjmiw_jBWPfG5bvD5d9TsRK2x8r4BT31sM_Vx31RoBeGim_bzUPTNNwa1Ijv> AMA Resolutions #508 (Illinois) & 509 (Indiana)

[2.] http://www.ama-assn.org/assets/meeting/2012a/a12-csaph-02.pdf<http://r20.rs6.net/tn.jsp?e=0017il--_V34jk0irrzfZrq4VxMUu5TkPHY-ylh3waocqrqws2XKtS8_srZVUeg_2yuHuuxnfdrR07_cQBqUnxRV2cD6eqVJQdId2yGntvCO7pOWEh-

The USRTK FOIA Campaign Against Academics: 40-plus years of public science, research and teaching under assault

Academics Review | Sep 02, 2015 | 0 comments

40-plus years of public science, research and teaching under assault

My name is Bruce Chassy and recently my name has shown up on lists of public sector academics under scrutiny by a multibillion-dollar industry-funded activist "freedom of information" campaign ironically seeking to expose industry ties and influence over my four-plus decades of public service as a government and then a state university research scientist and teacher.

So who am I and why is there this cynical interest in my work?

My career started in 1962 after earning my undergraduate degree in Chemistry from San Diego State University. I earned my Ph.D. in Biochemistry at Cornell University and then worked for more than 20 years at the National Institutes of Health researching public health issues. I also taught Biochemistry and Molecular Biology at American University. In 1989, I joined the faculty of the University of Illinois at Urbana-Champaign to head the Department of Food Science where I taught courses in nutritional biochemistry, food, food safety, biotechnology and GMOs, food microbiology and basic toxicology. My research at the university continued and included the development of recombinant DNA techniques and HOST-VECTOR systems for the genetic manipulation of food microorganisms, the regulation and biochemical mechanisms and control of gene expression and metabolic regulation. I am an author of dozens of peer-reviewed research articles on the subjects of food safety, biotechnology, toxicology and more. My research has been cited and supports the publication of more than 1,500 other peer reviewed scholarly works.

During my tenure at the University of Illinois, I oversaw the university's programs in food safety, and represented my expertise at numerous scientific society, commercial and trade association conferences. I mentored hundreds of post-graduate students and researchers, served on dozens of university, government and multi-stakeholder outreach committees, and was a member of the university's academic ethics program reviewing grants and lectured on academic and scientific ethics. In 2012, I retired from my full-time research and teaching and now enjoy the title of professor emeritus at the university.

While retired, because of my ongoing interest in the importance of credible, sound science driving public policy and regulation of food safety related issues, I joined with other academic colleagues and helped to found a 501c3 non-profit organization we call Academics Review. We review published claims associated with our technical areas of research and point out false or misleading representations of science to help ensure public and commercial policies are guided by facts based on rigorous scientific exploration.

Which brings us to today and the interest in my career by a group called *U.S. Right to Know (USRTK)* led by professional activist and political operative Gary Ruskin. Using Illinois state public records laws, Mr. Ruskin has demanded access to multiple years' worth of email correspondence between me and a long list of biotechnology industry related groups.[1] In particular, Mr. Ruskin and his funders are seeking to out those nefarious backroom dealings they allege have occurred between public researchers like myself and Monsanto.

What will he find? My former employer has turned over about 100 emails to, from or copying me with companies like Monsanto and the Biotechnology Industry Organization (BIO). Of these emails, many are replies by me and others to an original email and thus the sum total of original correspondence is fewer than ten (10) exchanges on about a half dozen topics. As Mr. Ruskin and his allies who claim public research has somehow been corrupted by such exchanges will certainly try to make hay over these exchanges, I provide the facts about them here:

- **Correspondence with George Harrigan**. Dr. Harrigan holds a Ph.D. in Plant Biochemistry and is a former researcher and professor at the University of Hawaii. He is a study director and senior scientist with Monsanto. Dr. Harrigan is a respected expert in his field and an extensively published scientist with nearly 100 authored articles in multiple peer reviewed publications. We collaborated on a chapter for an academic publication called "Metabolics" published in 2012 with more than 30 other scientists. Our chapter "Challenges for Metabolomics as a Tool in Safety Assessments" included full disclosure of both my and Dr. Harrigan's affiliations. As part of his co-authorship, Monsanto provided minimal financial support to the University of Illinois to cover the publisher's fees (sometimes called "page fees" and "article processing charges") for the publication and republication fees for using our work in academic text books. These expenses were handled by the university following the rules established to ensure full ethical compliance with academic publishing and none were paid to me. My salary, time and expenses for this work, which were part of my position and university expectations that I publish in my field of expertise, were 100 percent covered by the university. As to publishing and collaborating on research with scientists working for industry, university academics need access to and the public benefits from such expert collaborations.

- **Correspondence with multiple scientists from Monsanto, BIO and other universities**. In 2011, the U.S. Environmental Protection Agency announced a *proposed* review to the ways agricultural biotechnology is evaluated and regulated in the United States. Government agencies publish such reviews to provoke expert input and comments to help guide the formation of well-informed public policies, rule changes and regulations. This correspondence shows my collaboration in the form of phone calls with members of the National Academy of Sciences and other academic and industry experts to provide input to the EPA and their congressional oversight committees expressing our shared interests and concerns that sound science be the foundation of proper government rule making and appropriate regulatory oversight. **Universities, foundations and other public institutions also research and develop plants using modern biotechnology, including work in those areas of low commercial interest but which are critically needed in some of the poorest and neediest places in the world.** Regulations and policies not founded in sound science are of common interest to us and companies like Monsanto. As such, this correspondence included multiple exchanges reflecting the counter-lobbying being done by anti-GMO activists and organic industry lobbying groups to encourage non-science-based restrictions on the research, development and commercialization of plant biotechnology. This included emails alerting myself and other scientists to various media publications by these activists and lobbyists with suggestions that we, based on our expertise, consider responding. At no time in these collaborations was there ANY financial remuneration for my participation from any industry source. At no time in these collaborations was I, nor to my knowledge were any of the other independent expert views, compromised by the input and participation of industry experts. At no time did any industry representative ask us to say or do anything that was not our expert opinion or part of our expected job as independent, public sector academics.

- **Requests and correspondence to participate in international conferences and industry issues briefings**. Academic experts are frequently solicited to attend conferences and meet with companies to provide their input on research and science-related product development. On three occasions, Monsanto requested my participation at such events. Twice, I was requested by Monsanto to consider presenting at conferences in India and China based on my publications in the area of food safety and biotechnology. On one other occasion, I was invited along with several other independent academics, to see a presentation by Monsanto on new RNAi technology it was researching. My correspondence with Monsanto regarding these requests shows I shared my presentation materials and that Monsanto provided travel reimbursements for my attendance at these events. Further, this correspondence shows I declined any offers of honoraria for my time for doing so. In addition, my attendance at their research presentation included a standard non-disclosure agreement required to allow them to share information about their research and development plans. Such non-disclosures are common and required to allow outside independent experts to review and share their views about new technologies developments in various stages of commercial development. The email records show that we insisted the non-disclosure agreement explicitly stipulate that we would receive no compensation.

- **American Medical Association (AMA) Illinois and Indiana chapters' proposed resolution on GMO labeling**. In 2012, a resolution was put forward by John Fagan, an anti-GMO activist and founder of Genetic-ID, to have the AMA endorse mandatory labeling of GMOs based on unsupported safety allegations. Genetic-ID is a company that tests for the presence of GMOs in food products and financially benefits from labeling requirements. Correspondence will show that I was alerted to this proposal by Monsanto, which noted the company was responding and suggesting input from other experts on this topic would be useful to the AMA. As I am not a physician, I noted my input was not appropriate but offered to recommend the names of other more appropriate experts.

- **Announcement by Monsanto for support of the University of Illinois Ag Communications Program**. In May 2012, Monsanto and the University of Illinois announced a $250,000 grant to be put towards an initiative between the College of Agricultural, Consumer and Environmental Sciences (ACES) and the College of Media to help establish an Agricultural Communications Program endowed chair that would strengthen communications for agricultural and rural development. I was copied in on emails about that announcement one month prior to my retirement from the university. Neither myself nor the programs or research on which I worked were the recipient of or benefited in any manner from any money associated with that university support from Monsanto.

- **Other correspondence regarding published media articles on GMO safety**. There are a small number (fewer than five) of other email exchanges between me, other academics and staff at BIO or Monsanto about news articles where safety or other disparaging claims were being made about the science-based facts regarding foods derived from or associated with biotechnology crops. These exchanges solicited expert scientific advice among the participants (to and from both the academic and industry scientists) and discussions of appropriate and responsible ways to respond. At no time was I

requested to modify my independent expert views and I was never compensated in any way for my expertise.

As a public-sector research scientist, it was expected and a requirement of my position at the University of Illinois that I collaborate with and solicit the engagement of those working in my field of expertise. University and private sector collaborations are critically essential to ensure the public benefits from the best and most complete understanding of research and emerging commercial developments of any technology. Financial support from the private sector for public sector research, education and public outreach is also appropriate, commonplace and needed to further the public interest. Such support should be, and in all my experiences has been, transparent and done under the strict ethical guidelines of the public institutions that are benefiting from private sector or individual financial contributions. In fact, the university must approve all external relationships and regularly reviews them for adherence to ethical standards and absence of conflict of interest.

Mr. Ruskin at USRTK and his financial backers do not adhere to the same ethical standards or disclosures. I'm certain he and his funders in the organic food industry, who profit from attacking the safety of GMOs, will seek to characterize my correspondence with private-sector scientists as "close ties" to Monsanto and the biotechnology industry. A similar inspection of Mr. Ruskin's emails, financial ties and those who are using these campaigns, like his funders at the Organic Consumers Association and organic industry "academic" consultants like Charles Benbrook, to further the financial interests of their undisclosed financial backers should be the focus of media reports, government oversight and public outrage.

I am proud to stand up my professional relationships to such scrutiny as serving the best interests of my academic science and role as a public-sector educator. The same cannot be said of those seeking to use important freedom of information laws to disparage academics and other public-sector scientists and abuse the freedom of information process to drive them away from ongoing important collaborations in the furtherance of sound, science-driven public and commercial policy development.

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[1] Gary Ruskin's original FOIA request demanded my emails between 2012 and present and was later amended to also include emails from 2011-2012, and included demands to the Illinois Attorney General threatening litigation to force the University of Illinois to comply.