INFORMATION REQUESTED BY SCIENTIFIC ADVISORY PANE
TO DETERMINE THE ALLERGENIC POTENTIAL OF STARLINK CORN'S

RECOMMENDED BY SAP	DELIVERED	COMMENTS ON SUBMISSION	WH
Priority #1: Test individuals with suspected allergic reactions to StarLink corn for antibodies to Cry9C protein SAP 12/00, p. 26	IN PART	FDA tested only 17 people who called FDA directly and had reactions from 7/25 to 11/30/2000. Twenty-four complaints to FDA dating from Dec. to April 2001 were apparently excluded from the CDC/FDA investigation. Tests were conducted with bacterial Cry9C protein, not StarLink corn Cry9C protein.	The "spe Star evic reac
Priority #2: Monitor the medical community for additional cases of possible allergic reactions to StarLink SAP 12/00, p. 26	NO	No systematic outreach to the medical and allergy communities. Over 200 suspected allergic reactions to StarLink reported to food companies were not investigated; 94 sought medical attention, 20 at emergency rooms	To " prov of C
Monitor for possible allergic reactions from **occupational exposure** to StarLink corn SAP 6/00, pp. 8-9	NO	No data submitted from investigations of possible allergic reactions from mill workers or farm workers occupationally exposed to Cry9C in grain dust or pollen	Inha cou inha
Test animals fed StarLink for antibody response SAP 6/00, pp. 8-9	NO	No data submitted by Aventis on sera from animals exposed to Cry9C. Aventis and the government assume that Cry9C is broken down completely during digestion	Nee Rat alle
Priority #3: Provide data on levels of Cry9C in processed foods, including degradation products SAP 12/00, pp. 13, 14, 26	IN PART	No test for degradation products. Food processing may break down Cry9C into allergenic fragments not detected by test. Two tests give widely different results for levels of Cry9C in processed foods.	At p met leve proc
Determine level of Cry9C in infant foods SAP 12/00, p. 14	NO	No tests conducted to on infant formulas for the possible presence of Cry9C. Instead, EPA relied on USDA surveys of corn intake "that may not capture the small number of infants having severe allergenicity."	Infa food high to C
Priority #4: Data on impact of various processing methods on Cry9C levels in foods SAP 12/00, p. 26	IN PART	EPA examined industry data on general protein levels in wet-milled corn products such as cornstarch. Dry-milled products with higher levels of Cry9C were not examined.	Proc alth prot

For a further discussion of these points, see "The StarLink Affair," by Bill Freese, Senior Policy Analyst, Friends of the Earth (www.foe.org/safefood/). Submitted to the EPA StarLink docket, No. OPP-00724, for Friends of the Earth and Genetically E Food Alert.