

LEPIDOPTERA NEWS

December 2001

No. 4

MONARCH WATCH 2001

SCIENTISTS AT NEW YORK'S ANNUAL "MONARCH WATCH" EMPHASIZE DEFORESTATION AND Bt-CORN DANGERS

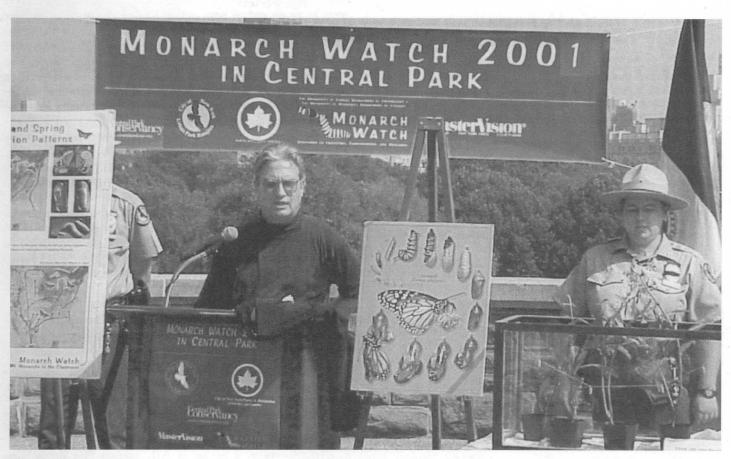


Fig 1. Dr. Kurt Johnson reviewing reports by the World Wildlife Fund and Dr. Lincoln P. Brower, at Monarch Watch 2001 in New York City. (© D. Allen)

Despite the World Trade Center tragedy of September 11, New York City's annual "Monarch Watch" event commenced in Central Park on September 22, with several hundred spectators and numerous representatives of world conservation groups in attendance (see *Lepid. News*, September 2000, for notes on the Monarch Watch program from last year).

Keynote scientific data at the event was provided by the World Wildlife Fund, whose Mexican components manage the new conservation strategy on the ground in Mexico (WWFM), and Dr. Lincoln P. Brower, Monarch expert and chief advisor to WWF.

WWFM and Mexico's Fondo Mexicana para la Conservación de la Naturaleza have helped the Mexican government design an inno-

ovative conservation scheme to protect and restore the unique high-altitude fir forest ecosystem providing critical winter habitat for the Monarch butterfly (*Danaus plexippus* (Linnaeus). This new conservation scheme includes an innovative new trust fund (the new "Monarch Butterfly Conservation Fund" ["Fideicomiso Monarca" in Spanish]) designed to involve the local populace in the conservation effort. Elements of the plan were outlined in the September 2000 issue of *Lepidoptera News*; legal work on the entity (which will allow the receiving of public donations) is just about completed.

As noted there, an attempt to protect the overwintering grounds was first made in 1986, when a Presidential Decree created the Monarch Butterfly Special Biosphere Reserve which [cont. on p. 6]

LEPIDOPTERA **NEWS**

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JOURNALS: separates (1990-95 only), \$1 first page, 25¢ each added page (specify author and citation). Past journal issues: \$22.50 each (1990-2001) (1994 HL double issue: \$45). Lepid. News: \$10 per year. CONTENTS for the journals are issued every two years.

NEW MEMBERS: the ATL journals are \$65 the first year for new members, the same as ATL members who pay before Dec. 31 each year. New members may join ATL anytime but membership begins in January (either the year of joining or for the next year).

TO OUR READERS

The aftermath of the WTC attack of September 11, 2001, still is reverberating in the USA, not just in Afghanistan and elsewhere. In this issue a serious advisory involving specimen shipments is highlighted. It seems the new postal plans for irradiating mail in the United States, to help prevent further movement of anthrax or other toxic substances in the mail, has produced the unforeseen problem of damage to various materials commonly sent through the mail, including insect specimens. The note on this in the Letters section herein notes a number of items that will have to be shipped in other ways if mail becomes routinely irradiated. Preliminary irradiations of mail have even resulted in fires in at least two instances reported in the news media. Even such common items as books will no longer be safe in the U.S. mail, since irradiation will damage paper and other cellulose products, thus making books deteriorate faster after irradiation. Likewise, insect labels would be affected and to some extent specimens themselves; and what the results would be for specimens as the insect pins became heated from irradiation is not clear. Obviously, no living material could be sent in the mail. There seem to be no end of new and unforeseen changes with the new millenium, and more that have an impact on biodiversity studies that include Lepidoptera. What remains uncertain is what would happen to all critical shipments should the express delivery services also irradiate their shipments. What is clear, however, is that specimen transport will cost a great deal more than it does now and may be entirely eliminated for museum specimens, thus greatly hindering specimen-based research.

In this issue, we also have an essay on the Bt-corn controversy as this involves the well-known monarch butterfly of North America, kindly allowed to be reprinted by the author and the Orion Society and their Orion magazine. A bibliography on pertinent Bt-com articles has been added herein.

We have the annual literature review, this year for Lepidoptera papers and books from 2000. The numbers of papers keep rising almost every year as all papers of more biosystematic interest to lepidopterists are included.

To all members — best wishes for the New Year!

I. B. HEPPNER **Executive Director**

NOTES

- 1. 2002 Annual Meeting: April 5-7 in Gainesville.
- 2. 2002 Annual Photo Contest: deadline is March 15, 2002. Note that the prize awards include a Grand Prize winner (award may be cash or a book). Interested persons should request an entry form for contest submissions.
- 3. Cover Photos: members can note that color photos for journal covers are always sought. ATL does not pay photo fees. Photos should be exceptionally sharp and in our page proportion.
- 4. ATL Debentures: a number of ATL members have already taken advantage of our interest rates and invested in ATL debentures. Please let us know what you can do to help! Returns of principal (at end of period) and interest (paid annually) are guaranteed.
- 5. ATL Home Page: see it at http://www.troplep.org. Coming soon (hopefully): color photo files of worldwide butterflies and moths!
- 6. ATL Photo Archives: Do not forget to consider ATL as the ultimate depository for your valued color slides of moths and butterflies and larvae. Do not let your investment of time and effort go to relatives who may not appreciate photographs of Lepidoptera; donate them to the ATL Photo Archives. You are also welcome to send listings of your holdings to add to the ATL Photofile database.
- 7. Life memberships: ATL life membership is a one-time payment of \$2,000 (or \$400 per year for 5 years).

MAIL IRRADIATION PRESENTS NEW PROBLEMS FOR MUSEUMS

The mailings of anthrax-laden letters in the United States during October 2001, resulted in adoption of various measures designed to safeguard the mail system. One expected proposal is irradiation of future mail shipments throughout the United States. More immediately, in the Washington, D.C. area, most mail to Federal agencies from mid-October to mid-November was held at mail sorting centers for examination and/or irradiation. This has presented new problems for museum materials sent through the mail, like to the Smithsonian Institution.

On 28 November 2001, Sally Shelton, of the Smithsonian Institution, sent a memo to Smithsonian staff about the mail problems, and the notes therein have been circulated to various persons interested in the repercussions this presents to specimen shipments. Excerpts are noted below. Also, the United States Postal Service (USPS) sent the following memo to government agencies on 19 November:

Dear Government Mail Customer:

On Monday, November 19, the Washington, DC post office begins delivering federal government mail that has been irradiated at a Lima, Ohio facility.

The irradiation process is safe, but can affect certain products sent through the mail. Although it is unlikely that the treated mail now being delivered contains any of the following products, if received, they should be discarded and replacements obtained:

- Any biological sample, blood, fecal, etc., could be rendered useless

 Diagnostic kits, such as those used to monitor blood sugar levels, could be adversely affected

- Photographic film will be fully exposed

- Food will be adversely affected

- Drugs and medicines could have efficacy and safety affected

- Eyeglasses and contact lenses could be adversely affected

- Electronic devices would likely be rendered inoperable

While the first pieces of irradiated mail being delivered are First-Class Letters, over time, departments and agencies will also be receiving flats (larger envelopes) and packages. It is more likely that the items listed above would be contained in flats or packages. Mail that has been irradiated includes First-Class letters postmarked since October 12 and addressed to Washington, DC government customers with ZIP Codes beginning with 202-205.

The irradiation process used at the Lima facility was tested and found to be effective by an interagency team of scientific experts that recommended release of the mail for delivery. The group was organized by the White House Office of Science and Technology Policy and included the Armed Forces Radiobiology Research Institute, the Food and Drug Administration, the Department of Agriculture and the National Institute of Standards and Technology.

Sincerely, original signed by: Thomas G. Day Vice President, Engineering United States Postal Service

Specimen packages were held for several weeks, causing concern about possible damage from museum pests. The Smithsonian memo then goes on to note irradiation problems by summarizing irradiation issues prepared by the Smithsonian Center for Materials Research abd Education (SCMRE) (a full copy can be obtained online at the website: http://www.si.edu/scmre/mail_irradiation.html).

In brief, SCMRE identifies the following risks posed by irradiation of organic and inorganic materials at the dosages suggested by the USPS:

Living specimens (including seeds and gametes) will be killed.

Cellulosic materials will be seriously affected, with the risk of embrittlement, discoloration and oxidation. This affects paper (including labels) and other plant-based materials as well as botanical specimens.

Proteinaceous materials may be affected in similar ways, though perhaps not to the same extent. This affects anything made from or containing skin,

chitin, feathers, hair or fur, or comparable products.

DNA is particularly at risk. Materials sent out for genetic analysis will be severely compromised, with the risk of both recombination and outright destruction.

Discoloration and fading will occur in a wide range of materials, from textiles to specimens to photographs.

Glass and mineral specimens may also be discolored.

Containers themselves may be adversely affected. Rubber and plastic seals and stoppers may become embrittled.

Magnetic media will probably lose significant information contact, and undeveloped photographic film will be exposed.

Some heating of materials may result, which can cause problems with preservative solutions and with adhesives.

Mitigation through shielding in the mail enclosure itself is not practical.

There is no apparent risk to the recipient from residual radiation, however. The principal risks are to the integrity and stability of the materials being shipped and irradiated. The units being purchased by the USPS for irradiation of mail are linear electron accelerators, used industrially for sterilization of food. USPS has a short statement at: http://www.kodak.com/US/en/corp/aboutKodak/sanitize.shtml. The first of these units will be installed in the DC area, most likely at Brentwood, as early as next month. We are certain that all incoming mail will be irradiated, but are not sure if outgoing mail will also be treated. At the moment, the plan is to irradiate flat mail (e.g. letters), not packages. That obviously could change in response to a threat or incident. A package irradiated on two sides would receive, logically, a double dosage.

There are no provisions at this time for exempting museum-bound shipments or for marking materials that have been irradiated by the USPS. However, the Smithsonian Institution is continuing a dialogue with the U. S. Postal Service on possible alternatives. There is some discussion in the medical community about seeking ways to handle mail order medication, mailing of medical test specimens, and living and genetic materials without placing them at risk. We are requesting any and all guidelines produced for this purpose.

In light of this, our procedures for handling loans and exchanges must be reviewed. Note that this problem is currently unique to the DC area but will in all likelihood become national as the planned 8-20 irradiation units are installed at key centers nationwide. There are several approaches that should be considered:

Immediate curtailment of mail-based specimen, artifact, photographic and magnetic media shipments. We recommend that all but the most critical shipments to NMNH be limited until the scope of the irradiation protocol is better known. In addition, scientifically and culturally significant holdings should not be sent into the DC area via USPS at this time. This is especially advisable for tissue samples and other genetic-resource specimens and for magnetic and unexposed photographic material.

The Smithsonian memo then goes on to recommend the use of delivery services such as Federal Express and United Parcel Service (UPS). For text and image mailing, persons are encouraged to send such items via e-mail attachments. Visiting researchers are encouraged to make on-site visits rather than ask for specimen loans, and likewise the return to loans can be as hand-carried items. The Smithsonian is also suggesting extension of some specimen loans as a temporary solution until the entire irradiation of mail is clarified.

All these matters also pertain to overseas mail and specimen loans. Likewise, it is to be expected that other museums will follow suit and make similar recommendations for specimens, artifacts, and other sensitive items to be shipped.

Many new problems are arising as a result of mail terrorism that no one had to consider before, but it is clear from the results to be expected of irradiation of mail, that many objects and specimens would be damaged if sent as normal mail items, thus posing considerable problems for research needs of museum specimens and transfer of film and electronic media. Also, personal hand-carrying of such items is not always viable, since new scanning of passenger baggage also would affect some sensitive materials if taken on planes. Also, it has been reported that some boxes of pinned insects have not been allowed onto commercial flights in the USA, as they were seen as "dangerous projectiles" of metal.

If the delivery services also begin irradiation of packages, then almost no specimens could be safely mailed from museums to researchers, thus considerably cramping future studies. All this would bring us back a 100 years to a time when most specimens were not allowed to be sent, especially overseas, and one had to make the expensive personal visits to museums to be able to see specimens and types. We certainly have a beginning to a new century with repercussions that were not anticipated just a few months ago.

J. B. HEPPNER Gainesville, Florida

POSTSCRIPT

A December 7, 2001, Associated Press report noted that some batches of mail being irradiated at a Bridgeport, NJ, post office caught fire on two days, and over 90 pounds of various kinds of mail was destroyed. The U.S. Postal Service stated: "Our engineers believe both incidents are linked to material present in the mail which cause overheating during radiation exposure." And further noted that "these two incidents are regrettable but expected." The AP report noted further that postal officials "declined to specify what materials might have overheated to cause the fires, saying that they did not want to give information to potential saboteurs."

With further such fires "expected," as the postal service states, one clearly cannot safely send specimens (or for that matter, anything unique or of value) through the mail anymore, and especially not larvae in alcohol vials.

POSSIBLE SMITHSONIAN BUDGET CUTS CALLED 'DEVASTATING'

The following was reported in the Washington Post newspaper, December 6, 2001:

The Bush administration has proposed a series of cuts in the Smithsonian Institution's budget, trims that lawmakers say would "cause serious and irreparable harm" to the museum complex.

In the preliminary work on the president's budget for the fiscal year starting Oct. 1, 2002, the Office of Management and Budget has suggested three fairly dramatic changes:

"OMB wants to transfer \$35 million from Smithsonian research offices to the National Science Foundation. A congressional analysis of the plan said "OMB proposes to strip SI of its most acclaimed science research operations, while failing to provide the resources necessary to improve other science units."

"The budget office also suggested stopping the restoration of the Old Patent Office in downtown Washington for a year. The historic building houses two important Smithsonian art museums: the National Portrait Gallery and the Smithsonian American Art Museum. Both have been closed since 1999, when the renovation began, and had been scheduled to reopen no later than 2005. The cost of the renovation has escalated to \$214 million from \$60 million. The federal government has paid \$49 million for the restoration; much of the rest will come from private funds raised by the museum.

"OMB also suggested taking \$20 million from Smithsonian general funds to improve security at the museums.

Jennifer Wood, a spokesperson for the Office of Management and Budget, said the plans "are in a predecisional stage."

But Rep. Robert Matsui (D-Calif.), a member of the Smithsonian Board of Regents, said, "The proposed cuts could be devastating. What we are looking at in inflation dollars is an 8 percent cut over 2002 appropriations. That is a blow to an organization already suffering from major cash flow problems at a time when we are trying to get people back to Washington."

The Smithsonian and the OMB still have time to negotiate. The formulation of the 2003 budget doesn't officially end until the president sends his budget request to Congress in February. The museum has responded to the OMB proposals through channels in a formal appeal. "We can make no other comment at this time," said David J. Umansky, the Smithsonian director of communications.

In a letter handed to OMB director Mitchell E. Daniels Jr., a group

of 32 lawmakers acknowledged that the overall budget for 2003 would be tight because of the war on terrorism. However, they said: "Because of the already daunting funding circumstances faced by the Smithsonian, and the very unique role it plays for our nation, we strongly believe that any such treatment of the Smithsonian budget will cause serious and irreparable harm to that organization and its programs."

In reaction to the uproar over science programs at the Smithsonian this year, Congress restricted changes in its science effort. It ordered that everything be left alone until the blue-ribbon commission reviewing all science programs issued its report. That is not expected until late next year.

In the letter to Daniels, the lawmakers stressed the importance of current building projects at the Smithsonian, including a sprawling annex for the National Air and Space Museum in Virginia, the National Museum of the American Indian and the Patent Building. "Each of these three projects, and the museums they will house, have extensive support here in Congress and across the country. Furthermore, should major cuts be required to the Smithsonian, these efforts could cause expensive delays or even serious contract penalties if the projects were to be canceled altogether."

The proposal to transfer research funds affects the Smithsonian Environmental Research Center in Edgewater, Md., the Smithsonian Tropical Research Institute in Panama and the Smithsonian Astrophysical Observatory, a joint operation with Harvard University in Cambridge, Mass.

Last year, according to Smithsonian records, the three leveraged their \$35 million federal appropriation to raise \$94 million in competitive grants.

A congressional source familiar with the proposals said the OMB plan essentially cuts the Smithsonian's mission in half because its scientific research programs would be decimated. "They could go down the tubes," he said.

The Smithsonian supports its programs through both private and federal funds. The Smithsonian received \$497 million from the government in the current fiscal year.

For several months this year, the science programs at the Smithsonian have been at the center of a controversy. Lawrence Small, the Smithsonian's secretary, proposed cutting several divisions. He eventually reversed a plan to close the Conservation and Research Center in Front Royal, Va., a facility that studies endangered species. His turnabout followed protests from lawmakers, nationally known scientists and scientific organizations. The Smithsonian Center for Materials Research and Education was also spared by congressional intervention.

Small still plans to reorganize the institution's science research, which has been one of the Smithsonian Institution's missions since its founding more than 150 years ago. Some of the plans to streamline the sciences into "areas of excellence" met with vehement protest at the National Museum of Natural History.

JACQUELINE TRESCOTT Washington Post Staff Writer Thursday, December 6, 2001; Page C01

OLD NAMES?

I read with interest your letter in *Lepid. News* 2001 (2) on the potential for displacement of familiar family-group names by the discovery of obscure generic names with priority over their junior counterparts that serve as types of said family-group names. The example you gave imagined the replacement of *Nymphalis* with an older name, which . . . would force replacement of . . . Nymphalidae, etc. Your readers will be relieved to know that . . . the 1999 Code says, "When the type genus of a nominal family-group taxon is considered to be a junior synonym of the name of another nominal genus, the family-group name is not to be replaced on that account alone." . . So the Nymphalidae can rest easy, even if *Nymphalis* [were] a junior synonym.

ANDY BROWER Oregon State University Corvallis, Oregon

COMMENTS ON COLLECTING AND NABA

As a member of ATL, NABA and other Lep organizations I'm responding with my personal viewpoint to the recent lengthy diatribe against a purported NABA policy against collecting.

I wholeheartedly agree that collecting is not immoral. It is through

collections and raising species that we become educated.

In fact, NOWHERE in the NABA organizational material is there any mention of any policy against collecting! All the chapters and butterfly counts I'm aware of over the years, do use nets for at least uncommon species, that may be released or collected for further examination. On other outings, we may request no collecting, which certainly doesn't prevent your return to collect. NABA does encourage viewing species, also usually mentioning that you will find the experience more satisfying by using close-focus binoculars. Two lepidopterist friends after being with and sharing binoculars with butterfliers, have obtained binoculars to use for butterflying.

From a different perspective, with greatly diminishing habitat, let alone all the obstacles an egg has of reaching adult stage, wouldn't it be almost foolhardy and perhaps immoral for a growing national organization of thousands to encourage ALL its members to collect, even if only resulting in immediately reducing adult quantities for others to view and

enjoy?

It has been said there probably haven't been more than 200 serious and consistent collectors at any previous time in the U.S. Most young collectors get sated after awhile going on to other activities. Undoubtedly, with wider recognition of butterflying, many others will become interested in leps and hopefully more interested in study which includes collecting plus a general awareness of the worth of financing more research and collections positions. Butterfliers can undoubtedly add considerable information, as have the multitude of birders about distribution, life cycles, habitat, etc., just by having more people being aware, in the field, sharing their sightings and experiences, which is already happening in south Texas.

On the other hand, collectors aren't necessarily altruistic, often not sharing localities for fear of other collectors cleaning out the adults. Particularly troubling is hearing a collector talking about going back to a site time and again to collect "all" of a particular species, especially when it may be a rarely documented species, only found every few

years.

With all due respect, please try to separate NABA and our President Jeffrey Glassberg to some extent. Glassberg, as mentioned, is "...a man of great vision for the development of presenting butterflies as a new nature sport...." I feel he is to be highly commended for his extensive time, effort and financial support toward raising awareness of butterflies as part of the great need for conserving habitat plus working toward that end, such as helping in establishing a NABA Butterfly Park in south Texas.

Dr. Glassberg, as most individuals at least middle-age, does have some very strong opinions. These are not necessarily those of the organization. Two that come to mind are his adament opposition to release of butterflies and assigning his own common names to some south of the border species already known otherwise in literature. Because NABA is "his" organization, as President, Editor of the quarterly magazine, financial backer, etc., and has personal public viewpoints, these views will likely be promulgated until we become larger, stronger, and a more diverse organization with others also in decision-making positions. At that time, a few changes of NABA are to be expected as a normal occurrence.

While ATL and NABA may not see eye to eye on everything, I hope ATL members will welcome NABA members into the family of lepidoptery, recognizing that we all have a genuine interest and need to work together in learning more about butterflies and preserving their continuation.

WANDA DAMERON Los Angeles, California

Thank you for writing the excellent letter on NABA in *Lepid. News*.

THOMAS SLONE
Oakland, California

I read your long letter in *Lepidoptera News* with great approval. [The anti-collecting view] is like a religous fervor. I think a shortened version of the letter should go to the *Lepid. Soc. News* to get a wider audience and reaction. British Butterfly Conservation are doing a tremendous job of conserving habitat but they don't ban collecting, only discouraging collecting species in those areas where they are endangered by habitat destruction. I remember remarking, many years ago, on being taken to a pine barren near Albany, NY, that the 'Karner Blue' was abundant in that particular barren but there was talk of a supermarket buying the land!

PAUL MILNER
Pisgah Forest, North Carolina

I would like to send a copy of your letter, "NABA Calls Collectors Immoral,". . . to [the] Southern Lepidopterists' Society newsletter for publication. . . . The more people who read your words . . . the better the scientific community will be.

LEROY KOEHN Georgetown, Kentucky

I thoroughly enjoyed your article in *Lepidoptera News* #3.... We've all heard this argument in bits and pieces; but this was so eloquently and succinctly done, I laughed, I cried. . . . It's so true about the "big lie," and I've been a volunteer ranger for the NPS [National Park Service], going on about 12 years, not to mention research with Ed [Knudson] for USFWS [U.S. Fish & Wildlife Service], Audubon [Society], TNC [The Nature Conservancy], TPWS [Texas Parks & Wildlife Service], etc., and have found at least a few good people. . . . I subscribed to "Listserve" here in Texas, earlier this year, and was kicked off because of some things I had to say. . . . It's nice to see that you . . . told the truth. . . . Ed [Knudson] was equally impressed by this masterpiece, and I wish this could be reprinted somewhere that has a larger audience.

CHARLES BORDELON Houston, Texas

The view of NABA regarding collecting was expressed in 1993 in the first issue of *American Butterflies* and is, "Collecting butterflies is not included among the purposes of NABA but NABA is not in opposition to other groups for which this may be a legitimate purpose." That position remains unchanged. I personally have no opposition to the collection of butterflies for scientific purposes and my extensive collection of Neotropical hairstreaks resides at the Smithsonian Institution.

In the article "Mitchell's Satyr Rides Again" (American Butterflies, Fall 2001, p. 16), I describe my and Jane Scott's discovery of a major population of Mitchell's Satyrs in Alabama. In the introduction to the article I state, "The last Mitchell's Satyrs in New Jersey were killed by immoral collectors." It is very difficult to believe that a person would read this to mean that all collectors are immoral. If I had said, "The embezzlement was aided by immoral accountants," would anyone read that to mean that I viewed all accountants as immoral? Obviously, I meant that the particular collectors involved, who collected (illegally trespassing on private land) every day during Mitchell's Satyr brief flight season and collected every Mitchell's Satyr that they saw, were immoral. If you don't believe that collecting every individual one can find of a rare and colonial species is immoral, then we disagree.

JEFFREY GLASSBERG President, NABA Morristown, New Jersey

I almost did not renew, but your letter about NABA and Glassberg convinced me to renew. Nice to see that someone still has the courage to speak up.

JEFF BAIER Napa, California

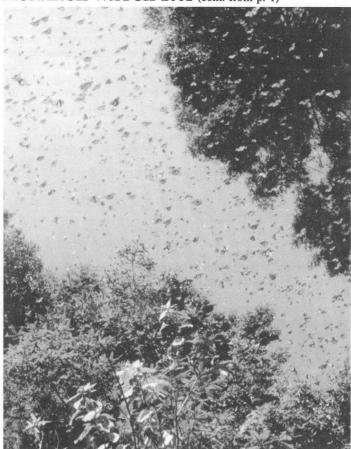


Fig. 2. Monarchs swarming during bright sunshine in Michoacán, Mexico, wintering haven (El Rosario Reserve, Angangueo). (© R. DeCandido)

protected 5 separate sanctuaries totaling 16,110 hectares. However, studies showed that between 1984 and 1999, 44% of high quality forest inside the reserve has been degraded, caused mainly by continued and uncontrolled access to forest resources. The annual deforestation rate for this period was 2.41%. It was obvious that the current conservation scheme has not worked. In November, 1997, during the Tri-national North American Conference on the Monarch Butterfly, SEMARNAP (the Mexican Ministry for the Environment, Natural Resources and Fisheries) decided to review the 1986 decree.

In support of this initiative, different institutions, led by WWFM and advisors like Dr. Lincoln P. Brower, developed a technical proposal for the redefinition of the protected area's boundaries. This proposal was

finished in June 2000 and served as the basis for a Presidential Decree that expanded the Reserve, connecting the 1986 sanctuaries in a contiguous corridor of 56,259 hectares. The new Reserve represents a viable solution both from the standpoint of the Monarchs, as well as for the economic well being of the local people that will be directly affected by changes in land use.

Economic incentives for local landowners need to be implemented to achieve successful conservation of the new reserve's forest ecosystem. WWFM and FMCN have established a trust fund which will provide the necessary financial resources to support long-term conservation activities and sustainable forest management by the local communities within the core zone of the new reserve. For the first time in Mexico's history, a conservation trust fund will be created specifically to offer incentives to local communities affected by the establishment of a protected area, making them integral participants in conservation and sustainable use activities.

Linking a compensation mechanism or an economic incentive system to the declaration of a protected area is an innovative concept in Mexico. Historically, land use limitations imposed by protected areas have given few options to land owners, unintentionally generating illegal resource use and social conflicts. Representatives of the WWFM emphasized that redefining the protected area of the Monarch overwintering sites and offering a compensation scheme to land owners presents a unique opportunity to change the way protected areas are established and managed in Mexico

For more information, lepidopterists can contact WWF Mexico Program, Av. México #51, Col. Hipódromo, México City, D.F. 06100, México (e-mail: wwfmex@compuserve.com.mx).

Dr. Lincoln Brower, who provided comments presented by Dr. Kurt Johnson, emphasized the still unresolved role of genetically engineered "Bt corn" as a danger to Monarchs in North America. Drawing from comments he recently published in *Orion Magazine* (Brower, 2001), he noted that the genetically engineered strain of corn known as "Bt Corn" produces pollen that can kill Monarch Butterfly caterpillars. Contrary to some reports in the news media, these findings (by Cornell University scientists) have not been discounted by reliable research from other quarters, especially research institutions supported by entities of the agro-industrial sector which have a financial stake in the widespread use of the genetically engineered crops. He noted that the agriculture industry has a history of carelessness with regard to collateral damage to benign or beneficial species that are part of the natural web of life.

He explained that the danger in the genetic engineering strategy is that it inserts various foreign genes into crop plants, in this case a bacterial gene that produces a toxin that kills the target species, the corn ear worm. However, in germination and growth of the genetically modified plants, the inserted DNA expresses itself in every cell — roots, stems, leaves, seed, and pollen of the corn plant all contain the Bt toxin. As a result, when the pollen is deposited by wind onto the leaves of milkweeds, Monarch caterpillars ingest it and can thus be endangered.

The Cornell research included mathematical models showing that pollen shedding and Monarch breeding happen simultaneously over considerable geographic ranges and that extensive monarch breeding occurs on milkweed in and around cultivated corn.

Dr. Brower emphasized that a major issue emerging from the Bt Corn debate is the way in which supposedly objective scientific information is influenced by the agro-business sector in a desire to manipulate the federal regulatory processes of the EPA. He said that a long look must be taken by science at the entire spectrum of genetically engineered crops in the future. A danger is that the "willy-nilly" application of these techniques may accelerate the industrialization of agriculture, global overpopulation, and further impoverishment of biological diversity.

KURT JOHNSON, Brooklyn, New York



Fig. 3. Deforested areas in Michoacán, Mexico (El Rosario Reserve, Angangueo). (© R. DeCandido)

THE CONCISE ATLAS OF BUTTERFLIES OF THE WORLD

by Bernard d'Abrera

2001. Millhouse Publishers, Melbourne, Australia. 353pp, 150 col. pl. (available in the U.S. from: BioQuip Products, 17803 La Salle Avenue, Gardena, CA 90248) US\$112.50 (Cat. #9128)

This latest atlas treatment by Bernard d'Abrera is a landmark in the publishing of books that attempt to cover the diversity of butterflies on a worldwide scale. The concisely expert text and marvelous color plates represent a real "door-opener" for the novice who wants to obtain a useful overview of the world's butterfly fauna and dream of traveling to exotic areas to see these beautiful creatures for himself or herself. Even the professional can usefully employ this work to quickly trace down an illustration of a rare genus or even species with which he or she is unfamiliar, or learn the number of species in each genus worldwide. Some critics, looking only at the evolution-creation debate, may overlook this invaluable contribution. Buy the book. Read it. And hopefully plan to use it as an overall guide to the wonderful diversity represented among the world's 20,000 species of butterflies.

D'Abrera has long been famous for the superb photographic quality of his series of books on the butterflies and larger moths of the world, and this book continues the incredibly high standards already set in his 20-plus previous published works. There is a really excellent introductory section on the biology of the butterfly, and its place in nature. Illustrated with spectacular half- and full-page color pictures taken in nature, the vivid world of insects and the place of butterflies in it is brought dramatically home to the reader. The writing is clear and unambiguous. The illustrations contribute in perfect harmony to the impact of the message, particularly when the author takes up the topics of the hand of man in causing extinction and reduction in the numbers of butterflies worldwide.

As he delves into taxonomy and classification, d'Abrera spends a great deal of effort in explaining to the reader where the author stands as a philosopher of science. At this point, the reader enters the potentially most controversial and philosophically arguable part of this outstanding book. If the professional evolutionist or biologist can read through this carefully, he will realize that d'Abrera has actually presented an amazing intellectual tour de force, covering d'Abrera's evaluation of many of history's most notable naturalists and professional biological scientists from Plato and Aristotle right to the present day. From his creationist perspective, he evaluates their discourses on evolution, or their incidental contributions to the development of evolutionary theory, in particular, the Darwinian theory of evolution. If you thought that an English bacteriologist, Dr. Alexander Fleming, discovered the antibiotic Penicillin, think again. D'Abrera reveals that it was a fellow Australian scientist, Sir Howard Florey, who should receive the credit (p. 50). And so it goes: d'Abrera's insightful evaluations of many of the most notable biologists of western civilization, and of their discoveries. He also provides a remarkable gallery of illustrations of many of these people (some of which I have now seen for the first time).

When he launches into the philosophical choices that he sees involved in the topics of mimicry, protective resemblance, and of course the overall concept of evolution, you may not agree with his arguments, but you cannot ignore them, if you wish to be intellectually honest and consider both sides of the evolution-creation controversy. I actually found it quite stimulating to read these sections, particularly his initial forewarning (in the long Foreword) when he paints the picture of a large ocean liner, proceeding at full-speed on a long voyage with most of the people on board engaging in a debate about classification and past history of species rather than worrying about an inventory and conservation of what we have left today (given that the world has so little time to save a tiny remnant of what even a century ago was a far greater diversity).

Throughout this section, the illustrations are stunning, the debate stimulating, and the topical coverages, particularly the conservation issues (including the role of museums such as the famous British Museum (Natural History), are invaluable contributions. The author summarizes his metaphysical views in Part IV in which he reconciles his observations of the flow of time with the Book of Genesis, and I leave it to the reader to conclude what he or she wishes after examination of the arguments that d'Abrera sets forth.

The rest of the book is an extraordinarily succinct presentation of the butterflies of the world, over 4,000 of them! Beautifully illustrated, organized by each faunal region of the world, this is a book to treasure and to use repeatedly. You can use it to identify your specimens if you don't have access to the expensive main series of larger volumes and if you do have that series, you will find this book, to use the author's words, "a most necessary supplement to them." In part, this is because the author made corrections and additions to the systematics and nomenclature used in the preceding series, and he also publishes several new genera, new species, and a review (starting on p. 194) of the Neotropical genus "Thecla" (Lycaenidae), which will probably send some American specialists in the group into a new energy orbit, but then controversy is good for stimulating more study on Lepidoptera, isn't it?

Anyway, this review should be used as an inducement for you to buy the book, to use the concise atlas approach to examine the wealth of diversity among the butterflies of the world, and to resolve to pursue your own future contributions towards taxonomy, conservation, and other essential issues. As noted, this book also contains d'Abrera's most forceful argument to date in presenting his case for the unacceptability of evolutionary doctrine and indeed virtually all evolutionary thinking, whether it be in mimicry, taxonomy, or even ecology. But this does not prevent even the most detached agnostic and atheist from using the book to his or her profit in identifying and appreciating the diversity of this wonderful group of animals, the butterflies. Indeed, some of such persuasion may particularly appreciate the iconoclastic philosophical approach that d'Abrera sets forth, surpassing all his previously published debates on evolution in this newest volume.

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Canary in the Cornfield the Monarch and the Bt Corn Controversy

by Lincoln P. Brower

HAVE STUDIED the monarch butterfly since 1954, and it is not unusual for me to receive inquiries about the biology and conservation of this wonderful insect. None was more fateful than a phone call in September 1998 from Linda Rayor telling me of a discovery made by her and her Cornell University colleagues, John Losey and Maureen Carter — that a genetically engineered strain of corn, the so-called Bt corn, produced pollen that could kill monarch caterpillars. Shortly afterwards Losey, Rayor, and I had a discussion about the implications of their study; the forces behind biotechnology are powerful ones, and it was obvious that the Cornell findings had serious scientific, political, and economic implications. Yet none of us could have predicted the firestorm that was about to descend.

This story is about how the proponents of the new genetic engineering technology distorted the scientific inquiry into the possible harmful effects of Bt corn on the monarch butterfly. In the ongoing debate over the Cornell findings, the scientific process has been spun, massaged, and manipulated by the agricultural industry, the U.S. Department of Agriculture, the U.S. Environmental Protection Agency, and elements of the North American academic community. The process disregarded international scientific standards and has helped to make science the handmaiden of industrial agriculture. As a consequence of these irregular proceedings, the monarch-Bt corn debate risks losing sight of a larger, more serious issue: the real danger that genetically engineered crops will accelerate the industrialization of agriculture, human overpopulation, and the impoverishment of biological diversity.

The findings of the Cornell scientists should not have come as a surprise, given the agricultural industry's history of carelessness with respect to nontarget species — benign or beneficial species that are part of the natural web of life. Forty years ago Rachel Carson alerted us that the chemical industry was spreading synthetic insecticides that were killing legions of beneficial insects and the birds that ate them.

In the years following *Silent Spring*, some agricultural industries looked for alternatives to chemical insecticides, and agricultural entomologists tried to develop solutions that would be more specific. One was to release foreign parasites to control crop and forest pests, many of which themselves had been accidentally imported. Hundreds of species of wasps, flies, beetles, nematode worms, fungi, bacteria, and viruses were gathered across the globe and released in North America by agricultural scientists. These exotic control agents also attack many nontarget species with serious, but largely ignored, effects upon native ecosystems.

Another biological approach was to manipulate the soil bacterium Bacillus thuringiensis. The Bt bacterium secretes a protein that, when ingested by a sensitive insect, causes the larval gut to break down and a gooey, black death ensues. Industrial and academic scientists have selected numerous Bt strains that are toxic to the larvae of different groups of insects. The Bt kurstaki strain is lethal to the caterpillars of virtually all moths and butterflies and is produced in mass cultures that are harvested and sold as Dipel. Used in home gardens as a "natural" toxic powder to kill tomato hornworms and cabbage caterpillars, Dipel is also sprayed to kill gypsy moth caterpillars in the eastern deciduous forests, spruce budworms in the northern boreal forests, and tussock moth caterpillars in the western Douglas fir forests. Extensive sprayings of Dipel and its derivatives, along with repeated releases of exotic parasitic insects, have severely reduced the populations of many benign and beneficial native insects, including several of the New England silk moths renowned for their elegance and bizarre caterpillars.

The danger to nonpest species was raised to a far more sophisticated level by the new science of genetic engineering, which makes it possible to transfer genes between any species on earth. When successful, the transferred genes give the recipient species the ability to synthesize proteins that were specific to the donor species. An obvious strategy would be to insert various Bt genes into crop plants. Then as the seeds of the genetically modified strain sprout and grow, the inserted DNA would express itself in every single cell of the growing seedlings. Wonder of wonders, the roots, stems, leaves, and seeds of the plant contain the Bt toxin and are toxic to virtually all caterpillars. Agricultural companies introduced the Bt genes into several crops, including potatoes, soybeans, coÉon, and corn. One major target was the European com borer moth, an economically damaging species that is found throughout the eastern United States and southern Canada.

Before any of these genetically modified organisms (GMOs) could be used commercially, the EPA required a battery of toxicology tests. The toxins of various Bt corn strains showed no apparent adverse effects on honeybees, ladybird beetles, and a few other invertebrates. The test results, together with the fact that the toxin is inactivated in the acid milieu of mammalian guts, led U.S. regulatory agencies to judge nearly all Bt corn strains safe for human consumption and the environment. Critically, however, toxicologists ignored the potential impact on nontarget species of butterflies and moths that are the denizens of the same ecosystems in which corn is grown.

Many biologists heralded the new Bt corn technology because they believed it would mitigate the need to spray insecticidal chemicals. The corporations involved in marketing the seeds (for the most part the same ones that had developed the synthetic insecticides several decades earlier) sponsored a multimillion-dollar campaign touting them as an environmental panacea. The response was stunning: by the 1998 season, twenty-five percent of the total U.S. corn crop (of eighty million acres) was planted with Bt corn.

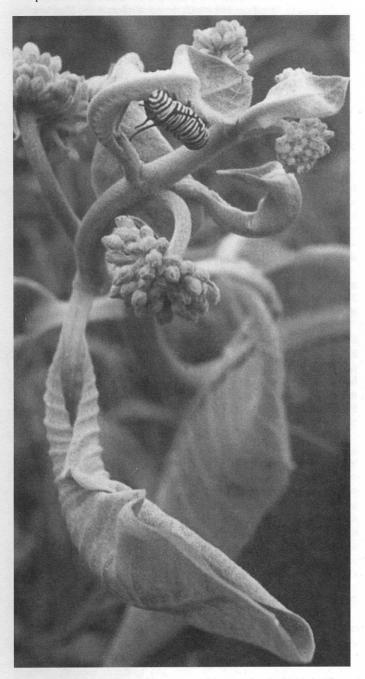


Fig. 1. Monarch caterpillar feeding on stunted leaves of an herbicided milkweed plant.

Genetic engineering also led to the development of numerous crop strains resistant to herbicides. It is now possible, for example, for farmers to plant "Roundup Ready" seeds of several crops — seeds that produce seedlings unaffected by Roundup spray. Roundup eliminates competing weeds, as well as nearly all native flora-including milkweeds, upon which the monarch depends. In the grassland states, nightly advertisements repeatedly promote the latest herbicide technologies. The result of such extensive use of herbicide-resistant crops is the destruction of biodiversity throughout North America and elsewhere, as millions of acres of land are converted to monoculture deserts of potatoes, soybeans, cotton, or corn.

If plants can be genetically engineered to produce their own pesticides and to resist synthetic herbicides, it is certain that crop strains can also be developed to grow in virtually any soils. Looking beneath the purported advantages of the new GMO technology to agriculture and corporate profits, an alternative view is that these corporations are converting the natural world into a biologically impoverished planet massively overpopulated by a single species: *Homo sapiens*. The sweeping extent of this technology can be seen in chicken factories that sit in the middle of vast cornfields, devoid of all native plants. The rich web of life that formerly occupied this prairie community has been reduced to an industrial food chain that has only three links: sunlight to corn, corn to chickens and chickens to humans.

NOWING THAT THEIR FINDINGS had implications for the hot topic of genetically modified food, the Cornell scientists submitted their manuscript to the American journal Science. Before sending manuscripts out for peer review, the editors screen them, using likely audience interest as one acceptance criterion. Despite the relevance of the monarch study to a timely scientific issue, the manuscript did not pass this hurdle. With a growing realization of the magnitude of the bomb they were sitting on, Losey, Rayor, and Carter revised their manuscript and submitted it to the British journal Nature. Popular and scientific challenges to the release of genetically modified organisms into natural environments have been major press fodder in Europe, and the editors of Nature sent the paper out for peer review. It was published in May 1999.

In their article, "Transgenic Pollen Harms Monarch Larvae," the Cornell authors asked: could windblown corn pollen accumulate on plants that grow extensively in and adjacent to cornfields and, like conventional insecticides, inadvertently kill native insects that are not pests? To test this question, they chose the monarch as their nontarget species. Female monarchs lay eggs on wild milkweed plants, the only plants that their caterpillars can eat. In their experiment, conducted in the laboratory, the authors dusted pollen gathered from one of the Bt corn strains onto the leaves of the common milkweed. They established that caterpillars that fed on the dusted leaves at eless, grew more slowly, and suffered higher mortality than caterpillars reared on milkweed leaves dusted with pollen from a non-Bt corn strain. The scientists were circumspect about their results and stated clearly that more research was needed to determine the impact of the toxic pollen on monarchs in the natural environment.

According to a private communication, an ashen-faced president of a major biotech company marched into a board meeting shortly after the article appeared and stated, "I have only one thing to say about the Cornell publication: Bambi." Had the scientists chosen a different insect, it is likely that few people would have responded to the *Nature* paper. They used the monarch, however, loved by schoolchildren, gardeners, and millions of other people throughout the world. The monarch instantly became a *bête noire* for the field of biotechnology. The world press latched onto the study even before the article was in print, and soon protesters wearing corn and butterfly costumes were marching in the streets.

The Agricultural industry's reaction to the news was immediate and vigorous. Criticisms belittling the Cornell study appeared widely in the U.S. and on British television. Agricultural companies launched web pages (for example, on monsanto.com, novartis.com, and farmsource. com) downplaying and, in some instances, ridiculing the study. The principal argument they put forward was that the benefits of using Bt corn far outweigh the environmental costs of the pesticides it replaces. Their most common assertion — that Bt corn reduces the need for other insecticides in cornfields by two orders of magnitude, a gross exaggeration — was repeated in press releases and uncritically accepted by numerous scientists. This same justification was used in articles favoring the new technology that appeared in respected journals, such as the *Proceedings of the National Academy of Sciences, U.S.A.*

The Cornell study mobilized the environmental community at a critical time because the earlier approval of Bt corn was about to expire, and the EPA was required to undertake a reassessment process before

renewing the registration. The Union of Concerned Scientists and the Environmental Defense Fund petitioned the EPA to restrict the planting of Bt corn and to reassess the environmental risks of genetically engineered crops. The environmentalists' initiative made it clear that further scientific study of the relationship between the monarch and Bt corn was needed before a ruling could be made. From this point on, however, scientific efforts to define that relationship would be overshadowed by the agricultural industry's efforts to control the information on which the EPA decision would be based.

The industry's early responses to the Cornell paper were designed to cast doubt on whether the scientists' laboratory findings were applicable to monarch caterpillars in the field. Many statements were misleading, fanciful, and betrayed an ignorance of the monarch's natural history. Incorrect or speculative pronouncements fed to the media included that the' major geographic area of monarch reproduction lies outside the corn belt; that monarchs breed before pollen is released from the corn tassels; and that pollen release occurs over too short a time to have a major impact on the caterpillars. All these industry-released statements ignored the extensively documented literature on the monarch's lifecycle, including information known since the nineteenth century that multiple overlapping generations of the monarch occur throughout the summer breeding range, virtually assuring that the monarch caterpillars would be widely exposed to the shedding corn pollen. Other press reports asserted that few pollen grains land on milkweed leaves, that monarchs lay most of their eggs on the undersurfaces of the leaves, that milkweed leaves have slick surfaces to which corn pollen grains will not stick, that the toxicity of the pollen grains is below the threshold that kills monarch larvae, and that one hundred times more monarchs are killed by cars and trucks than by Bt corn. The most flagrant lack of scholarship exhibited by the Bt corn proponents was their failure to cite the current scientific literature documenting that extensive monarch breeding occurs throughout the North American corn belt.



Fig. 2. A female monarch laying its egg on a milkweed.

The agricultural industry's manipulation of the press was soon made even clearer. Several corporations, including the Monsanto Company, Novartis A.G. of Switzerland, and the Pioneer Hi-Bred of DuPont Company formed a soothingly named consortium, the Agricultural Biotechnology Stewardship Working Group (ABSWG). The ABSWG contacted university scientists and provided funding for studies that would address issues raised by the Cornell findings. U.S. and Canadian scientists conducted a research program during the summer of 1999, the

results of which were to be presented at a scientific symposium in Chicago on November 2, hosted by the ABSWG, and also attended by representatives of the EPA and the USDA. The avowed purpose of this symposium was for the scientists to present and discuss their findings, review their methodologies, and determine through consensus what information was inconclusive or missing.

Because of the manner in which the press releases had been handled, I had an uneasy feeling about ABSWG's symposium and how the results of the summer research would be reported there. Fortunately, a private foundation concerned about the threat of Bt corn to the monarch made it possible for me and monarch expert Myron Zalucki, of Queensland University in Australia, to attend. Our mission was to use our combined knowledge of monarch biology to make a fair and critical evaluation of the scientific content of the presentations. Because of the hurried nature of their summer research, all of the meeting participants prefaced their scientific presentations with the caveat that their data and conclusions were preliminary. Some results indicated possible major impact, others suggested minor impact, and most agreed that the current research base could not resolve the problem. Afterward, Zalucki and I concluded that the available toxicology data were inadequate and that far more field studies were needed to ascertain the extent of overlap between monarch breeding, milkweed plant distribution, and corn pollen shedding. We also recommended several specific biological questions that needed to be answered before the EPA could possibly make an informed judgment on whether to renew the registration of Bt corn.

At the meeting, Carol Yoon, a *New York Times* science journalist, made a stunning announcement: she had just received a fax from her *Times* editor indicating that a media advisory had been released earlier in the day. The headline describing the still-in-progress meeting stated: "Scientific Symposium to Show No Harm to Monarch Butterfly." Several of the participating scientists whose studies were supported by ABSWG had apparently agreed on the contents of the misleading press statement prior to the symposium. There was now no doubt that the symposium had been co-opted by the ABSWG, and that the press was being manipulated. Yoon's report exposing this fiasco, "No Consensus on the Effects of Engineering on Corn Crops," was published in the *Times* on November 4.

A little more than a month later, on December 8, 1999, the EPA held a Scientific Advisory Panel meeting, a requirement of the EPA regulatory process leading to renewal or denial of re-registering Bt corn for commercial use. Though public comment was allowed, surprisingly few people attended the meeting. I related that the results of the Chicago meeting had been inconclusive and obfuscated by the Agricultural Biotechnology Stewardship Working Group. Another testimony, by a scientist representing one of the agricultural companies, was a vituperative commentary on both the Cornell results and another recent *Nature* paper documenting that Bt toxin can leach from the corn plants into the soil. A clear pattern was emerging: corporate spokespeople will attack scientists who discover any potentially adverse environmental effects of GMO crops.

Following these meetings, demands from the environmental community for further research on the impact of Bt corn on the monarch grew stronger. In the spring of 2000 the industries and the USDA jointly announced that each was allocating \$100,000 for a competitive grants program to support several Bt corn and monarch butterfly research Projects during the coming summer. A number of monarch scientists speculated that the paltry funding was a palliative and that the resulting research findings would be ignored in the EPA's re-registration deliberations.

Aware that new data and more sophisticated analyses would be forthcoming, the Union of Concerned Scientists and eleven other public-interest organizations made a request to the EPA: to postpone the next Scientific Advisory Panel (SAP) meeting until more data were collected and made available to the public, including the scientists' findings gathered over the summer of 2000. The EPA, however, held the SAP meeting on October 19, a month *before* the scientific symposium was scheduled to take place.

Prior to the SAP meeting, the EPA had allowed several corporations to review the agency's preliminary assessment and suggest modifications.

In addition, the EPA allowed the companies to withhold important data as confidential business information. One of the principal documents contained approximately forty deletions of so-called "proprietary" data. It was therefore impossible for the EPA panel or independent scientists to evaluate the data. Both industry and the EPA documents also ignored relevant data readily available in the scientific literature. Thus, without considering the new information that would be presented the following month, and drawing passages almost verbatim from documents prepared by industry, the EPA's interim assessment of the risks and benefits presented to the SAP stated that "the published preliminary monarch toxicity information is not sufficient to cause undue concern of harmful widespread effects to monarch butterflies at this time."

THE SUMMER 2000 research results were presented in November at a second Chicago symposium, attended by many of the same industry, academic, and governmental groups that had been present at the 1999 symposium. Investigations examined the toxicity of the various strains of Bt pollen, when and where monarchs feed and breed, and where they encounter the pollen. Some of the findings seemed reassuring. Toxicity studies appeared to indicate that the pollen of some strains of Bt corn was less lethal than that of others and that most of the strains currently in use may be in the less-toxic group. Several studies indicated that corn pollen does not drift very far from the cropfield, and a risk analysis using the new data predicted little effect on larvae feeding on milkweeds beyond a few meters from the edge of a field. Other studies warned of new threats. One determined Bt pollen to be toxic to laterstage monarch larvae — significant because older caterpillars had been assumed to be less sensitive than the young ones. Clarifying a contentious point of the 1999 symposium, new data fed into revised computer models now led to predictions that pollen shedding and monarch breeding happen simultaneously over wide geographic areas. This finding was made an the more important by new data showing that extensive monarch breeding occurs on milkweed growing inside cornfields. This, in turn, underscored the devastating effects that the long-term use of herbicides, and genetically manipulated organisms such as Round-up Ready crops, will have as their use totally eliminates milkweeds from the fields.

The papers presented at this symposium reflected the complexities of the Bt corn issue. Working with different methodologies even in areas where their investigations overlapped, the scientists' findings were not easily compared. The studies, for example, used different techniques for collecting and testing pollen samples and for controlling contamination by other vegetable matter. In addition, none of the studies addressed Zalucki's and my recommendations that toxicology tests were needed to determine whether sublethal doses of pollen ingested by larvae affect reproduction or migratory capacities of adult butterflies. In summary, despite the EPA's interim assessment, the overall database that had been assembled through November 2000 was not adequate to resolve whether Bt pollen is a significant detriment to the monarch butterfly.

MAJOR ISSUE that emerges from the Bt corn debate is the way in which scientific information is obtained and used in the federal regulatory process — a question with consequences far greater than the decision to register or ban Bt corn. As the handling of the monarch saga has shown, the EPA's October 2000 decision was based on scientific information that was largely controlled by the industry and failed to measure up to even minimum standards adhered to by the international scientific community. These standards require peer review of manuscripts by independent scientists chosen by the editorial boards of scholarly scientific journals. Peer review assures that experiments are reproducible, that the data are statistically valid, that the conclusions are logically derived from the data, and that they state clearly what is and what is not resolved. This independent evaluation of scientific evidence is a sine qua non for the integrity of science. By ignoring the standard of peer-reviewed science and by relying on information supplied by the same corporations that it means to regulate, the current U.S. federal regulatory system is severely flawed.

The Bt corn issue has raised public concerns about the system by which the federal government evaluates the safety of genetically

engineered products. The process that will finally determine the commercial fate of Bt corn is the same one that is applied to every one of the thousands of toxic chemical products and genetically modified organisms that fall under the jurisdiction of our nation's regulatory system. This is the system warned of in *Silent Spring*. It is the system that Wendell Berry described more than thirty years ago. Will North American society ever face up to the environmental and cultural erosion caused by the cozy economic relationships of agriculture, business, government, and large segments of academia?

This Bt corn-monarch butterfly saga provides evidence that international agricultural and chemical corporations, a large segment of the academic community, and our federal regulatory agencies care not one whit about biodiversity. Sophisticated advertising, such as that by Archer Daniels Midland Company, an underwriter of nightly news broadcasts on PBS, garners public support for seemingly heroic agricultural technologies designed to feed everyone, everywhere. The same advertisement implies that the beneficent company is developing corn crops engineered to replace petroleum.

It seems certain that the profit-driven mindset of our political and corporate leaders will continue to promote biotechnology, and to fuel unsustainable human population growth with its consequent usurpation of natural habitats and their rich arrays of natural creatures, large and small.

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POSTSCRIPT

Bt corn was relicensed by EPA in the fall of 2001 following several industry-sponsored studies. Industry control of the process did not allow reasonable time for critical review, and what was made pubic was replete with censored information. Control extended to five peer reviewed manuscripts that were said to be unavailable for scrutiny for "proprietary" reasons. These were finally released by the National Academy of Sciences ludicrously close to the end of the public review period as an "early edition" on the World Wide Web. The Bt corn proponents' shrewd orchestration of these papers allowed EPA to get off the hook and relicense Bt corn. Some of the new data supported the Losey et al. findings that had been vituperatively attacked when their story broke in Nature in May 1999. The questions of toxicity to the five larval instars of the monarch, as well as non-lethal but possibly debilitating effects on adult monarchs, remain unanswered. The industry touted finding that pollen does not blow far from the cornfields became irrelevant when it was discovered that large numbers of milkweeds fed upon by monarch larvae in the corn belt grow inside the cornfields. Ominously, these milkweeds are assured elimination as new crops that are genetically engineered to resist herbicides take over and sterilize the industrial corn and soybean fields. The widely propounded myth that Bt corn significantly reduces the use of insecticides to a significant degree lives on. The foxes have indeed been effective in guarding their chicken coops.

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