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November 22, 2000

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852.

Dear People:

I just learned that you have been petitioned by Caudill Seed Co. to amend the food additive regulations. You have ruled to allow sales of sprouted seeds without labeling them as irradiated.

I believe this is the correct reference: Department of Health and Human Services, Food and Drug Administration 21 CFR Part 179[Docket No. 99F-673]. This would provide for ionizing radiation to control microbial pathogens in seeds for sprouting, effective October 30, 2000.

As an organic farmer and consumer, I have several strong objections. First, one seed company's petition is not a fair basis to change rules. One company translates to monetary self-interest.

Second, The FDA is charged with safeguarding the public. There are no valid studies that assure us that irradiation is safe for human and environmental health. It is essential that you require labeling of all foods and "food additives" when they receive any radiation. This gives consumers the information they need to make choices for their health.

Third, there is not justification for "making sprouts safe from pathogens". Too many questions loom about irradiation and causing resistant strains. Other measures best serve the safety issue, such as clean washing and handling.

I request a full public hearing process regarding this change.

Thank you,



Ellen Vande Visse

99F-2673

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