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

RE: Docket No. 99F-2673

29 November 2000

Dear FDA:

The irradiation of sprouting seeds serves no useful food safety purpose; encourages irresponsible seedsmen and sprout growers to sell contaminated products; and will cause consumers to be misled about the safety of sprouts. This FDA action favors the large businesses that support it and hurts small sprout producers.

Current FDA-recommended seed sanitation procedures and confirmatory testing guidances for producers of sprouted seed products have resulted in a minimum of sprout-related outbreaks of foodborne illness this calendar year. There is no epidemiological evidence to support the inclusion of seed irradiation as a risk-reduction step in the production of sprouts.

The use of irradiated seed would not have caused those irresponsible seed producers and sprout growers implicated in earlier outbreaks of foodborne illness to be in compliance with FDA guidances or make them more responsive to food safety issues. Those outbreaks would not have been prevented just because the seed used had been irradiated.

Irradiating seed does not remove the animal feces, urine, vomit or pus that may coat the surface of seeds improperly grown, harvested, processed or stored.

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The Food Safety Initiative of 1997 requires a “field to table” approach to food safety. FDA approval of seed irradiation will undermine efforts being made by the USDA, Canadian Food Inspection Agency, the International Sprout Growers Association and others to encourage the safe production of sprouted beans and seeds. Research has proven that seed irradiation is not 100% effective in destroying pathogens. Studies show that pathogens regenerate after irradiation—the net effect of irradiation on pathogenic material does not support its use with seeds to be used for sprouting.

Consumers of sprouted products expect a fresh, natural alternative to processed foods. Approving the use of seed irradiation will destroy the integrity of the sprout industry. By not requiring the labeling of this irradiated product, the FDA becomes party to the concealment of this destruction. Consumers will unknowingly purchase and consume a product that may contain toxic irradiation-induced substances that may cause harmful long-term damage to the human body.

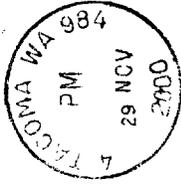
The obvious lack of research on radiolytic effects in seeds and the sprouts they produce demands that these issues be addressed before unleashing a potentially dangerous technology on unsuspecting consumers of sprouted seed products. The documented difficulties in applying this technology to seed sanitation requires that further studies be done to address these critical issues.

The large companies that support seed irradiation will profit from this FDA action at the expense of the small sprout producers who will be required to pay a premium for the questionable benefits that this technology offers. These same companies will attempt to shift liability to the FDA in the event that an outbreak of foodborne illness implicating their irradiated seeds proves this technology to be ineffective in the control of pathogens.

Please do not allow the irradiation of seeds for sprouting. Thank you for this opportunity to express our concerns.

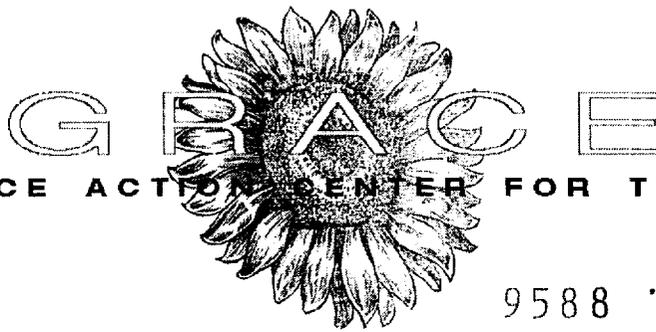
Sincerely,
Greg & Lorna Lynn

Harmony Farms
12663 SE Green Valley Rd.
Auburn, WA 98092



DOCKETS MANAGEMENT BRANCH (HFA-305)
FOOD AND DRUG ADMINISTRATION
5630 FISHERS LANE, RM. 1061
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December 1, 2000

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Rockville, MD 20852

Re: Federal Register 99F-2673

To Whom It May Concern:

I am writing to strongly object to the FDA amending it's food additive regulations for the use of ionizing radiation to control microbial pathogens in seeds for sprouting, ruling that "sprouts grown from seeds that have been irradiated need not be labeled as treated by irradiation where the sprouts themselves have not been irradiated."

I believe all products should be labeled properly.

Sincerely,

Alice Slater,
President

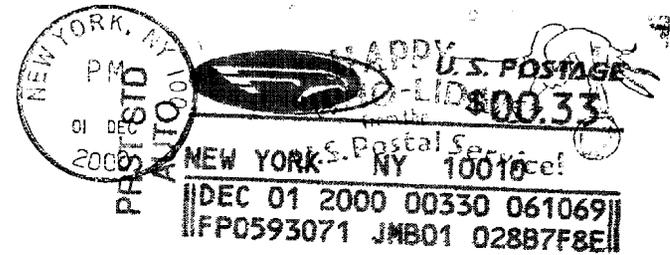
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GRACE

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