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

RE: Docket 00N-1351 Food Labeling; Use of the Term "Fresh" for Foods Processed With Alternative Nonthermal Technologies

November 20, 2000

To Whom It May Concern:

I am writing to object to the use of the term "fresh" to describe any food treated with nonthermal processing. I also request that you rescind the decision to allow raw foods treated with irradiation be labeled as fresh.

The term "fresh" implies untreated, unprocessed food. Consumers should be able to have confidence that their fresh fruits and vegetables will provide them with the nutrition they expect. Too much of the food on store shelves is junk; please allow us the nutritional benefits in whole, fresh, *non-irradiated* fruits and vegetables.

Sincerely,

Christina Salvi

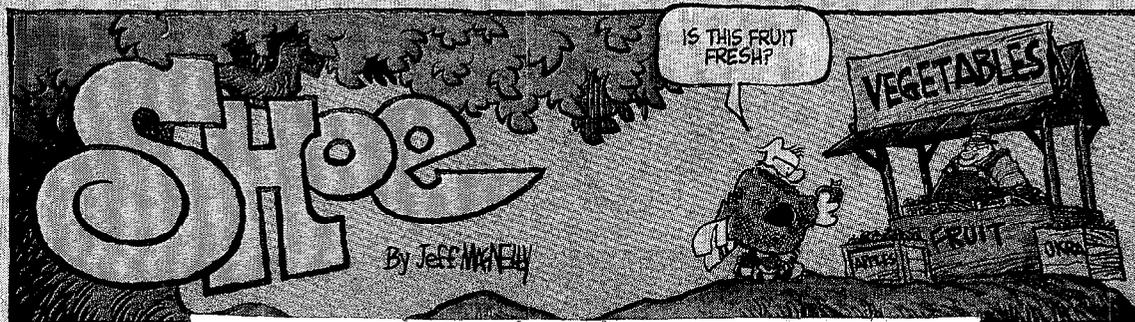
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SHOE

By Chris Cassatt & Gary Brookins



New York Times

FRIDAY, NOVEMBER 28, 1986

Letters

Irradiation Could Mean the End

To the Editor:

Food irradiation (news story, Nov. 12) is not widely used overseas for fresh fruits and vegetables. Given worldwide clearance by January 1981 by 21 countries, irradiation was by 1982 not commercially used for fresh produce by any country. Now it is used for fresh produce by only a few countries. Japan, which initially irradiated potatoes for the fresh market secretly on the island of Hokkaido, was "caught" by consumers and now irradiates potatoes for the processed market — on the same island.

The produce industry in this country says it is concerned not only about the cost of food irradiation, as you say in speaking of gamma-radiation plants in New Jersey, but also about consumer acceptance, its feasibility as an alternative to fumigation, the necessity of it for shelf life. For example, Sunkist Growers Inc., California citrus cooperative, stated to the citrus industry this year that it does not consider food irradiation feasible for citrus at this time. The regulations may be in place; the technology for fresh produce is not.

The Food and Drug Administration approved only low-level irradiation (100 krads and under), but most fruits cannot get shelf life below 100 krads. Anyway, why do we need shelf life for produce? I want my produce fresh. "If we get more shelf life," a produce executive for California's Lucky Stores asked at a produce-convention seminar several years ago, "what are we going to do with all that fruit?" Retailers want to move produce out, not keep it around to take up space.

Originally, the F.D.A. proposal was for irradiation to treat produce for fruit-fly infestations, in place of ethylene dibromide fumigation, which became controversial during the Med-

fly crisis in California. This was the only infestation of commercial proportions California has ever had.

It's possible, with increasing travel to and from Hawaii (which has a number of flies), California will have more large-scale infestations. We hope not, but it somewhat explains irradiation facilities in that state. But why irradiate produce in New Jersey, a Northeastern state too cold for the threat of fruit flies? Do irradiators plan to irradiate fruits and vegetables from other states for shelf life? (Irradiation lobbyists are looking for F.D.A. approval of much higher food irradiation levels soon, which would make shelf life irradiation more of a possibility.)

Will the time come when all produce is irradiated, for shelf life and "hygienic" reasons? Food irradiation is economically feasible only when the facilities are used daily; irradiating fresh produce one day and medical instruments the next is not technologically feasible.

If all fresh produce should, in future, be irradiated, there would be no more choice for consumers of fruits and vegetables. Right now, though, we have a choice.

MELVINA BAUER
Editor, Produce Business
New York, Nov. 13, 1986

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