

Danila B. Oder  
Organic Consumers Association  
530 S. Kingsley Drive, #402  
Los Angeles, California 90020-3536  
213/387-5122  
<http://www.purefood.org/irradlink.html>

SEP -4 A9 36

August 16, 2001

Dr. Bernard Schwetz  
Acting Commissioner  
U.S. Food and Drug Administration  
14-71 Parklawn Building  
5600 Fishers Lane  
Rockville, MD 20857

Dear Dr. Schwetz:

As a person who has extensively researched the issue of food irradiation, and has written and spoken about it numerous times, I am concerned about the FDA's upcoming action on a food industry proposal to irradiate ready-to-eat foods - a proposal that the food industry is already telling the public that the FDA is going to approve. I work with the Organic Consumers Association, a national, nonprofit, public interest, food-safety organization based in Minnesota, on the web at [www.purefood.org](http://www.purefood.org). OCA has 100,000 people in our database, including 30,000 subscribers to our electronic newsletter, 40,000 members, volunteers, and supporters, and over 1700 cooperating retail coops, natural food stores, and farmers markets.

As you know, the FDA must follow strict guidelines before approving food additives for human consumption. *The FDA has never performed the battery of tests recommended by the National Academy of Sciences—its own authority—on irradiated foods.* Given that a substantial portion of our diet is already approved for irradiation, I urge you to refrain from legalizing the irradiation of any additional types of food until up-to-date research is conducted on the potential that a diet high in irradiated foods could increase the amount of cancer and birth defects. If the ready-to-eat petition is approved, every major element of our diet would be legal to irradiate except dairy, beans, and fin fish (as for bakery products, wheat flour and wheat can be irradiated).

This extensive approval of irradiation was not what the FDA had in mind in 1986 when it approved the irradiation of fruits and vegetables—the basis for subsequent approvals—using an assumption of the effect of radiolytic products of one eight-ounce serving per day of irradiated food, the equivalent of one large apple. While I recognize that irradiation is a production tool that has some built-in constraints

98N-1038

C 5471

(including cost, capacity, quality deterioration of irradiated food, and availability of other treatments), nevertheless there are several forces pushing our food supply in the direction of prophylactic irradiation for all meat products and overall high usage. Such forces include the Codex's attempt to remove ALL limits on irradiation dosages (not yet finalized) and the WTO rules that if the U.S. has approved irradiation for a food, it cannot deny the import of the same irradiated food from another country.

Federal funding for the needed definitive research on the safety of irradiated foods was proposed in the House in June, and killed in Committee at the instigation of a manufacturer of irradiation equipment. I urge you to wait until such funding becomes available before approval of *any* new foods for irradiation.

Yours truly,

A handwritten signature in cursive script, appearing to read "James Oser". The signature is written in dark ink and is positioned below the typed text "Yours truly,".

**Danila B. Oder**  
530 S. Kingsley Dr. 402  
Los Angeles, CA 90020-3530

LOS ANGELES / HOLLYWOOD CA  
12 A  
900  
28 AUG  
2001



Dr. Bernard Schwetz *16-70*  
Acting Commissioner  
U.S. Food and Drug Administration  
14-71 Parklawn Building  
5600 Fishers Lane  
Rockville, MD 20857

