



GLOBAL RESOURCE ACTION CENTER FOR THE ENVIRONMENT

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April 30, 2002

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Cc: Dr. B. Schwetz  
US Food & Drug Administration  
Office of the Commissioner  
14-71 Parklawn Bldg.  
5600 Fishers Lane  
Rockville, MD 20857

Gentlemen:

I am writing to you because I oppose any further food irradiation approvals across the board, but most recently, for ready-to-eat foods and shellfish, until a comprehensive testing program on the health effects of irradiated foods is conducted and the results fully disclosed to the public.

Past experiments have revealed a wide range of health problems in animals, including cytotoxic and mutagenic effects, premature death, a rare form of cancer, DNA damage, stillbirths and other reproductive problems, fatal internal bleeding, organ malfunction, and low weight gain. As to more immediate effects, irradiation can cause nutritional deficiencies, by destroying up to 96% of certain essential vitamins in foods (e.g. Vit. B; 80% of Vit. A), as well as essential fatty acids and other nutrients.

Irradiation does nothing to remove the feces, urine, pus and vomit that often contaminate meat, despite the fact that it kills most bacteria in food. Ready-to-eat foods, insofar as they use such products, would not be exempt. Therefore, irradiation does absolutely nothing to discourage the continuation proliferation of filthy conditions in slaughterhouses and food processing plants which allegedly "necessitate" the application of irradiation in the first place.

In addition to initiating a complex sequence of reactions that literally rip apart the molecular structure of food, the process *creates known carcinogens* like benzene and formaldehyde, as well as new and unidentified chemicals that have not been evaluated for safety.

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These “unique radiolytic products” formed in irradiated food do not occur naturally in food. One such by-product, 2-DCB, was recently found to cause genetic and/or cellular damage in rats and human cells alike. The World Health Organization did not even follow its own recommendation to study the toxicity of such products formed in high-dose irradiated foods before proposing that the international dose limit, *equal to 330 million chest x-rays*, be lifted.

In legalizing food irradiation, the USFDA similarly failed to determine a level of radiation to which food can be exposed and still be safe for human consumption, which requirement is mandated by federal law. It also relied on laboratory research that did not meet the mandated modern scientific protocols. (Title 21, Sec. 170. 22, USCFR, Fed. Reg. filings 1983-2000.)

Irradiation plants may use technology incorporating cesium-137, a highly radioactive waste material left over from the production of nuclear weapons, which is dangerous and highly unstable. In 1988, a cesium-137 leak near Atlanta led to a \$40 million, tax-payer-funded clean-up.

Despite the extraordinary risk, irradiation does nothing to remove the feces, urine, pus and vomit that often contaminate meat, despite the fact that it kills most bacteria in food. Ready-to-eat foods, insofar as they use such products, would not be exempt. Therefore, irradiation does absolutely nothing to discourage the continuation proliferation of filthy conditions in slaughterhouses and food processing plants which allegedly “necessitate” the application of irradiation in the first place.

Because it increases the shelf life of food and utilizes large, centralized facilities, irradiation encourages the globalization and consolidation of food production, distribution and retailing industries.

If irradiated foods are stored longer and shipped further from the farm, these foods will arrive at the dinner table with nearly no nutritional value at all, after what miniscule remaining nutrient base there is decomposes over time. Everyone will be eating ‘empty’ food, whose flavor, odor and texture, incidentally, is often modified by irradiation, sometimes disgustingly so.

The long-term consequences of food irradiation to our health are unknown and there are simply too many unanswered questions about the safety and wholesomeness of irradiated products to justify allowing any additional types of foods to be irradiated.

Please do the right thing and ensure that these products are safe to eat before allowing them to reach the market.

Sincerely,

GRACE, by  
Leslie Seff

GRACE

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