May 11, 2000

Dean Selby
2521 7th Ave. W
Seattle, WA 98119

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Dockets Management Branch (HFA 305)
Docket # 98N-1038
Food & Drug Administration
5630 Fishers Lane, Rm 1061
Rockville, MD 20852

Dear Food & Drug Administration:

I would like to take this time to express my concern over irradiated labeling and the possibility food producers using this technique will not be required to conspicuously and prominently label which foods they irradiate, including ingredients (such as irradiated meat used in canned soup). Although I feel food producers, especially the meat packing industry, would be wiser to pursue better methods of sanitation not only during processing but also during the raising of stock I am still not writing against the most extraordinarily fancy method of cleansing. All I desire to communicate is that I feel consumers should be given the right and choice to make the decision for themselves whether or not they want to serve themselves,

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their family, friends, or restaurant clientile a product which may have been rendered nutritionally challenged because of the said extraordinarily fancy method of cleansing. As Europe requires (the Codex international labeling requirement) all irradiated food to be labeled "irradiated," I strongly feel we should embrace similar standards; it would seem underhanded to me that irradiated Virginia ham exported to France must be labeled thus but the same ham sold in Virginia would go unlabled for fear of consumer reactionism.

If products are still labeled "pasteurized," "homogenized," and "cold filtered," I feel it is no jump also to label irradiated foods thusly, especially in light of the fact irradiated foods are nutritionally different than their unirradiated counterparts. The United States is already the most deviantly malnourished country in the world, much of which is caused by protective food production methods designed to protect the consumer, although I do admit most of the reason for this state of the nation is related to filling our spiritual void with mouthfulls of highly processed snack foods marketed & sold by companies who know no better; yet this is not the business at hand.

Obesity, a form of malnutrition, is not caused by

a person consuming vast quantities of well balanced foods high in nutritional value, rather it is caused by the consumption of vast quantities of unnatural foodstuff absent of nutritional value & high in chemical preservatives, saturated fats, and sugars. The obese are not bursting at the seams with vibrant health, puffed up with nutrition, nor are they huge and healthy, they are diseased, and obesity relating to the form of malnutrition discussed above (opposed to obesity caused by metabolic or glandular reasons) is a massive problem, possibly even outweighing education as one of our major national faults but more likely directly linked to and with poor education.

Yet how does the irradiation of nutritionally sound foodstuff affect natural health? As does the pasterization process, the irradiation process destroys some of the good foods nutrition. It is already hard enough for many to eat healthy, well balanced meals, so why then deliver them a wholesome product that has been will fully yet secretly nutritionally damaged? It is a cunning strike against us at the cash register, and everyday millions of americans are in a sense cheated out of nutrition because of another process - pasteurization. Although the loss of 50% of the natural vitamin C in milk, 38% - 80% loss of the B complex, all the

vitamin D content, the loss of 90% of the enzymes (including phosphatase - needed by the body to assimilate calcium!), a decrease in digestibility because of pasteurized-hardened protein bonds, and chemically altered unsaturated fats and carbohydrates may be the price we must pay to avoid milk-born illness, I cannot help but wonder how different we would be if all these good things had remained unchanged in our national beverage.(1)

Regardless of my idealistic dairy speculations and my irradiation diatribe, (we're not here to discuss the process, rather the labeling) the fact remains that many processes although seemingly benign and seemingly the optimal answer to a nagging problem, turn out to be a python in your taco come morning. For instance, it took English doctors nearly a decade to trace persistant national health problems to a nutritional deficiency caused by white bread, a staple now fortified but which, having been "invented" with the creation of the steel roller mill, was not and which only began to reveal its problems 50 years after the general populace began ingesting the soft loaves. If those first loaves of Wonder Bread circa 1850 had only been labeled...!

(1) Colimore, Benjamin and Sarah Stewart Colimore, "Nutrition and Your Body." Light Wave Enterprises. 1974. Pg 19

I am not drawing any correlations between irradiated food and processed wheat, I simply want to remark that long-term effects of certain processes are sometimes only realized through tragedy, and although some producers who will or are using irradiation would rather not think in the long term, I do and I shall and I not only desire to know about the processes my dinner has faced I demand to know it, and the only way I will be able to make conscious decisions about what I myself eat or what my clientele ingest is through honest, upstanding labeling. I have great faith America's nutritional woes can be turned around, although not for many generations, but such can only be accomplished with honesty on all sides, the producers, processors, the nutritionists, and the chefs. Thank you for your time.

Sincerely
Dean Selby
CHEF

Dean Selby
2521 7th Ave W
Seattle WA 98119

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