

PO Box 2905
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November 19, 2000

21 '00 NOV 30 AM 11:08
Dockets Management Branch (HFA-305)
Food and Drug Administration
Room 1061
5630 Fishers Lane
Rockville, MD 20852

Re: Docket # (N-1351 Food Labeling: the Use of the Term "Fresh" for Foods Processed with Alternative Nonthermal Technologies— Public Meeting

To Whom It May Concern:

According to the dictionary, the word "fresh" commonly means- 1. Recently grown or newly made- such as in "fresh" coffee. 2. Having original strength, vigor, quality, taste.

This is what consumers understand as the meaning of the word "fresh" and in regard to food, it means "recently grown" in contrast to stored-for-a-long-time and "with its original level of vitamins and enzymes intact," not processed in any way. The food industry's attempt to hijack the term "fresh" is an effort to capitalize on the public's desire for foods of high quality, good taste and recent harvest, while selling a processed product.

It is a disservice to consumers to redefine the word "fresh" as commonly understood for industry's advertising purposes and to try to "stretch" the word to include irradiation or any other processing technology such as high pressure, pulsed light, etc. which are used for specific industrial purposes such as meeting quarantine regulations, reducing bacterial contamination or extending shelf life.

THIS PROPOSAL WOULD RENDER THE TERM "FRESH" MEANINGLESS.

Consumers want to know how their food has been grown and if it has been further processed after harvest. American consumers favor more rather than less information in choosing food (farming method, country of origin, processing, etc.)

Consumers will lose faith in government agencies if labeling information is misleading, distorted or incomplete. So will our trade partners. Generally if a food has been tampered with but still looks the same, it should be truthfully labeled as to any additional treatments.

We feel it was a mistake to include food treated with irradiation up to 1 kilogray as a

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"fresh" food product. There are small losses of vitamins and texture, as well as enzymes, even below that irradiation dose. Some crops are very radiation-sensitive. When you revise the regulations, we strongly urge you to rescind your inclusion of irradiated products as "fresh" and not add other non-thermal processing methods.

With concern,

A handwritten signature in cursive script that reads "Ellen Vande Visse". The signature is written in black ink and is positioned below the typed name.

Ellen Vande Visse

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