

FIPA

Food Irradiation Processing Alliance

5544 '01 DEC 10 P1:27

31 October, 2001

FIPA Member Companies:
Food Technology Services Inc.
Gray*Star, Inc.
IBA Food Safety Division
MDS Nordion
Mitec Advanced Technologies
Revis Services/Puridec
STERIS Isomedix Services

Dockets
Comments on Food Irradiation Labeling
(Consumer-friendly labeling requested)
U.S. Food & Drug Administration
Center for Food Safety and Applied Nutrition
200 C Street SW
Washington DC 20204

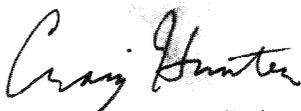
Dear Sir or Madam:

Please find attached a position statement on Food Irradiation Labeling. It was prepared by the Food Irradiation Processing Alliance (FIPA), an industry association representing key participants in the irradiation industry, formed to promote understanding of food irradiation and to facilitate adoption of this safe and effective technology.

We hope that this position statement will help the Food & Drug Administration to develop wording that will help consumers have a fairly presented opportunity to consider the added safety that irradiation can bring to many meat and poultry products.

Please let us know where you have questions or we can be of further assistance.

Sincerely



For the Food Irradiation Processing Alliance
Craig Hunter
Vice President, Business Development
Industrial Irradiation
MDS Nordion

Attach.

99F-5522

C5

Labeling Irradiated Food

Recommendations of the Food Irradiation Processing Alliance

Consumers & Irradiation

Numerous research studies have shown that the word "irradiation" on the label of irradiated foods causes a significant level of concern among consumers. Although this comes from a lack of understanding, it is nevertheless true. However, once consumers understand the process, its safety, and effectiveness, most express a willingness to try irradiated food. It should be noted that food processors, retailers, restaurants and food service operators all want the benefits offered by food irradiation. However, they have shown considerable reluctance even to offer consumers a choice to buy irradiated food because of concerns of a backlash in the market.

With education and sufficient time, the negative connotations of the term 'irradiation' may fade and irradiated foods become generally accepted. This has been demonstrated in Polk County, Florida, where advertising, pamphlets, store demonstrations, and the enthusiastic co-operation of the Department of Public Health have resulted in acceptance of irradiated food and steady sales. Thus, while education is beneficial and should continue, allowing terminology that is more consumer-friendly would speed acceptance and eliminate needless cases of foodborne illness. However, such an education process will be time consuming and expensive.

The Importance of Alternate Terminology

Using terminology that does not include the words "irradiation" or "radiation" will allow consumers to know that the food has undergone a process that reduces bacteria, without the accompanying fear generated by the word itself. As an example, focus groups have shown that some people associate irradiation with radiation therapy for cancer, which makes people feel ill. This can make them hesitant about consuming irradiated food.

There have been successful efforts to use alternative wording to ensure that valuable technologies will gain needed widespread acceptance. In one example, "*nuclear*" *magnetic resonance* was changed to *magnetic resonance imaging* or MRI, in order to make the term friendlier to the public.

A comparable situation is occurring for some irradiated products currently on the market. Certain marketers are using the term "electronic pasteurization" extensively to promote irradiated frozen ground beef patties, while limiting the use of the term "irradiation" to the legally required minimum. The term "electronic pasteurization" is accurate to the extent that it conveys to consumers the understanding that the bacteria level in the product has been reduced; however, at this point there are no data indicating that irradiated raw meat is now as safe as

pasteurized milk. It appears that this terminology is creating a higher level of acceptance with consumers.

Recommended Terminology

Irradiation is a general term that can refer to many different things, including alpha particles, electron beams, ultraviolet rays, gamma rays and microwaves. Describing the effect on the product will be more accurate. Thus FIPA first suggests the term "**ionized**" to refer to the physical changes to which the product has been subjected. Many consumers are already familiar with this through acquaintance with such topics as the ozone layer of the atmosphere. The description is accurate without being unnecessarily controversial.

Current regulations require that the word "treated" be included in the label. This word also creates a negative feeling with consumers because it is the same terminology often used with chemicals and pesticides. It is also associated with the word "treatment", which is used when people are sick and thus has a negative connotation. If a comparable word is required, it is recommended that "**processed**" be used. This will not create an unnecessarily negative feeling with consumers, but will still be accurate and meaningful. Thus FIPA would also recommend some form of "**ion processed**" or "**processed with ionizing energy**" or "**processed by ionization**". In each case, the terminology describes the physical process that the product has undergone, using terms that are not threatening. A statement of benefit, such as "to control harmful bacteria" or "to ensure a safer product" should be encouraged.

Please note that similar terminology is already being used in other countries. In Chile, Lipton tea is labeled (translated from Spanish): "For your safety this product has been treated with ionizing energy". Other products say "processed" or "preserved" with ionizing energy. Products in France have been labeled (translated from French): "Treated by ionization".

Whatever terminology is used, it should not prejudice any one irradiation technology versus any other technology. To maximize the food industry's ability to implement irradiation in the most effective and economic way, the industry should have the freedom to use whichever technology makes the most sense for the application.

Consumer Understanding

There may be a concern that changing to "ionized" or "ion processed" or "processed with ionizing energy" will introduce a term with which consumers are not familiar or do not understand. By definition, any new term will not be familiar to consumers, but will grow to be familiar over time. Familiarization will be quite quick, as most processors will provide further explanation on the label or at point of sale, as they are currently doing for irradiated products. The research referenced above demonstrates that many consumers still do not correctly understand the term irradiation (which they often confuse with 'radioactive'). Thus, there will be some lack of understanding anyway, so it should not be an

impediment to using the term ionized. If objections are made on this basis, they will not arise based on technical concerns regarding safety or effectiveness, but will likely come from those who are generally opposed to the process and wish to continue to see terminology that is perceived negatively by consumers.

Pasteurized

It still might make sense to use the term "pasteurized" as part of the label where the process is being used specifically for bacterial control. While not identical to the effect that pasteurization has on milk or juice, irradiation can have a comparable result if the dose is delivered at a level sufficient to meet minimum microbial reduction targets, provided that other HACCP reduction steps have produced a product with low bioburden prior to irradiation. Such requirements could be developed and have even been anticipated, in part, by the U.S. Department of Agriculture in its regulations for red meat, where it provides for the ability to label a product as *E. coli* O157:H7-free in validated circumstances. However, the issue is not simple, given the variable effects of D-10 values, dose variation and substrate. If these issues were addressed, it then might make sense to use terms like "cold pasteurized", "electronically pasteurized", "ion pasteurized", or "ionic pasteurization".

It would not be possible to use the term pasteurized in conjunction with irradiated fruit where the dose is low and only intended to eliminate insects and extend shelf life.

Sunset

Finally, FIPA recommends that a sunset clause should be attached to the labeling regulations, so that the requirement to use the terminology would expire after three years. This will give consumers a significant amount of time to get accustomed to these products. Companies who want to establish that their product is being sold with an extra level of safety might still use some form of irradiation labeling. However, just as meat that has previously been frozen can still be sold as fresh, or fruit that has been "hot dipped" can be sold without labeling, or spices that have been fumigated can be sold without labeling, irradiated food should not require special labeling.