



Food & Water Watch - 1400 16th Street, NW Suite 225 Washington, DC 20036
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February 21, 2006

Division of Dockets Management (HFA-305)
Food and Drug Administration
Department of Health and Human Services
Room 1061
5630 Fishers Lane
Rockville, MD 20852

RE: Docket Number 2005p-0459, Citizen Petition Requesting FDA to Enforce Ban on Carbon Monoxide in Case-Ready Fresh Meat Packaging

Transmitted via facsimile: (301) 827-6870

Dear Sir or Madam:

Please accept the enclosed comments in support of the above-captioned Citizen Petition filed by Kalsec, Inc. to rescind approval by the Food and Drug Administration (FDA) of the use of carbon monoxide in case-ready meat packaging.

I am filing these comments on behalf of Food and Water Watch, a non-profit consumer organization.

We believe that the practice of permitting carbon monoxide in modified atmosphere packaging for meat products can lead to deception in the marketplace. Consumers rely on meat color to make purchasing decisions. Carbon monoxide artificially preserves the color of red meat – often considerably longer than the sell-by dates indicated on product labeling. This practice can serve to mask the signs of adulterated or spoiled product, which can lead to serious illness and even death for consumers.

We are also concerned that FDA did not do thorough research on this practice to test for its safety. Additionally, we have questions about whether it should have been classified as a food additive under the Food, Drug and Cosmetic Act instead of a color fixative. In granting approval for carbon monoxide in case-ready packaging, FDA has abdicated its responsibility to ensure that food supply is safe from meat companies looking to enhance shelf-life of what is supposed to be a “fresh” meat product.

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We strongly urge that the Agency rescind its tacit approval of this practice. The Agency is celebrating its centenary year and should return to its roots of protecting the public against deceptive practices -- not kow-tow to big meat industry interests.

Should you have any questions regarding our comments, please feel free to contact me at (202) 797-6550.

Sincerely,



Wenonah Hauter, Director