Date: 3-22-99

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket No. 98N-1038, Irradiation in the Production, Processing, and Handling of Food

To whom it may concern:

I support the recommendation by the Center for Science in the Public Interest regarding labeling of irradiated foods:

> "any foods, or any foods containing ingredients that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

Like other labels, irradiation labels are required by FDA to be truthful and not misleading. I believe that the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase involving the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling.

I recognize the radura as information regarding a material fact of food processing. The requirement for irradiation disclosure (both label and radura) should not expire at any time in the future. The material fact of processing remains. Even if some consumers become familiar with the radura, new consumers (e.g., young people, immigrants) will not be. The symbol should be clearly understandable at the point of purchase for every one. If there is no label, consumers will be misled into believing the food has not been irradiated.

I urge you to place the comments received on the Internet so that the public can be informed about who is participating in this comment process.

Sincerely,

Stephen A. Oder

98N-1038

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Food and Drug Administration
5630 Fishers Lane, Room 1061
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Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

To whom it may concern:

The FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods.

Regarding the issue of labeling, in its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. Consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by the consumer.

In addition, processing by irradiation causes chemical changes that are not evident and are potentially hazardous. Meat may have a higher level of carcinogenic benzene. All irradiated foods contain unique radiolytic products that have never been tested.

Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have a right to know if this process has been used on their food.

As to the kind of label used, I believe that label should be large enough to be readily visible to the consumer, on the front of the package. The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura).

Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should not be permitted to expire.

Yours truly