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May 5, 1999

Dockets Management Branch [HFA-305]
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket # 98N-1038, "Irradiation in the Production, Processing and Handling of Food."

To whom it may concern:

I am writing as a public citizen to encourage the FDA to 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.

With regard to the issue of labeling, in its initial petition the FDA concluded irradiation was a "material fact" about the processing of a food, and so, rightly, should be disclosed. Since the material fact remains, the labeling should remain as well.

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It is clear that 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.

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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.

Irradiation is 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 it should be large enough to be readily visible, on the front of the package. 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 the widespread use of irradiated foods, I believe the FDA's labeling requirement should not be permitted to expire.

Yours truly,

Peter Adair

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