KATHLEEN A. JUERGENS
3229 NE 7th Avenue
Portland, OR 97212

May 11, 1999

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

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

To whom it may concern:

I am writing to urge that the FDA 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. The FDA has previously concluded that irradiation is a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, the labeling should remain. American consumers deserve real information about what is being done to our food!

Irradiated food is different from non-irradiated food in ways we are just beginning to understand. 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.

In order for labeling to be a meaningful source of information, the label itself must be large enough to be readily visible to the consumer, 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). Vital information about the healthfulness and safety of our food must not get lost in the "fine print"!

Irradiation proponents argue that the labeling requirement should be discontinued because it "alarms" consumers. What they mean by this is the inescapable fact that *the American people do not want irradiated food*; and given a choice, most of us will not choose it. Those who stand to profit from nuking our food want to take away our choice by taking away our right to know what we're buying. The FDA must not buy this profoundly undemocratic, anti-science and anti-consumer argument. Keep the labeling requirements for irradiated food!

Sincerely,

Kathleen A. Juergens

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