May 13, 1999
Dockets Management Branch HFA-305
Food and Drug Administration
5630 Fishers Lane 0800 Room MAY 16 '99 A9:29
Rockville, MD 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 OR 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 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 TO BE TRUTHFUL AND NOT MISLEADING. I BELIEVE THAT THE TERMS "TREATED WITH RADIATION" OR TREATED BY IRRADATION SHOULD BE RETAINED. ANY PHRASE INVOLVING THE WORD "PASTEURIZATION" IS MISLEADING BECAUSE PASTEURIZATION IS AN ENTIRELY DIFFERENT PROCESS OF RAPID HEATING AND COOLING.

98N 1038 I RECOGNIZE THE RADURA AS C 2036

INFORMATION REGARDING A MATERIAL FACT OF FOOD PROCESSING. THE REQUIREMENT FOR IRRADIATION DISCLOSURE (BOTH LABEL AND RADURA) SHOULD NOT EXPIRE ANY TIME IN THE FUTURE. THE MATERIAL OF PROCESSING REMAINS. EVEN IF SOME CONSUMERS BECOME FAMILIAR WITH THE RADURA, NEW CONSUMERS WILL NOT BE. THE SYMBOL SHOULD BE CLEARLY UNDERSTANDABLE AT THE POINT OF PURCHASE FOR EVERYONE. IF THERE IS NO LABEL, CONSUMERS WILL BE MISLEAD INTO BELIEVING THE FOOD HAS NOT BEEN IRRADIATED.

SINCERELY,

Gerry Stein

LESLEY STEIN
48 OLD STAGE RD
MADBURY NH 03820

PORTSMOUTH, NH 038
PM
14 MAY

USA H
First-Class Rate

DOCKETS MNGT. BRANCH HFA-305
FOOD + DRUG ADMINISTRATION
5630 FISHERS LANE ROOM 1061
ROCKVILLE, MD 20852

20857/0001