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To	Docket Manag. FDA	From Consumer Alert	
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August 21, 2000

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852
[Docket No. 98F-0165]

RE: Irradiation in the Production, Processing and Handling of Food
[Docket No. 98F-0165]

Consumer Alert® would like to register its support for the final rule regarding the food additive regulations to provide for the safe use of ionizing radiation for the reduction of Salmonella in fresh shell eggs.

While we realize that the Final Rule specifically asked for objections to the rule, our organization thinks it important that the support of a consumer organization be on record.

Irradiation has been recognized by a significant number of national and international scientific organizations as well as the Food and Drug Administration as an important food safety tool, and its use has been approved for a wide variety of foodstuffs.

Since Salmonella contamination is a serious food safety concern for consumers, especially for people with weakened immune systems, approving the use of irradiation of fresh shell eggs for the reduction in the numbers of Salmonella can add another tool to improve food safety for consumers. Irradiation is certainly not a "magic bullet," but together with other improvements and increasing consumer education about the safe handling of fresh eggs, it might help to reduce the number of consumers who suffer negative health consequences from food-borne pathogens.

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Consumer Alert has supported and encouraged the development and use of technology as a means to provide safer food and other products to consumers. Taking into account the widespread endorsement that food irradiation receives in the scientific community, we would like to encourage the U.S. Food and Drug Administration to consider the approval of food irradiation for possible other areas, such as the treatment of certain refrigerated, frozen or dried human food products derived from meat, poultry, fruits or vegetables, often called "ready-to-eat" food products (see petition to the FDA by the Food Irradiation Coalition from August 23, 1999).

While food irradiation is no substitute for practicing good manufacturing practices during food production and processing, it can help to achieve a higher level of food safety for consumers. Food safety can be enhanced in many ways, and the use of approved irradiation technology should be considered one of the tools.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Frances B. Smith". The signature is fluid and cursive, with a long horizontal stroke at the end.

Frances B. Smith

Executive Director of Consumer Alert

*Consumer Alert, founded in 1977, is a national, nonprofit consumer group headquartered in Washington, DC.