

Donna Shalala, Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, DC 20201

Nov. 18, 1999

Dear Secretary Shalala,

I am writing to you today to express my concerns about the labeling standards for irradiated foods. I understand that no final rule has been issued, and that public concerns are still being taken into account. It is with this understanding that I write to you today.

I am an engineer with a bachelor's degree in Nuclear Engineering from the University of Illinois (1982), and so I am, I think, aware of the process and techniques of food irradiation. I also believe that I am less likely than the average lay person to be swayed by emotional or uninformed passions on this topic.

However, I really do think that all irradiated foods need to have a **permanent** label identifying them as such, and that the label should be **prominently displayed**, and should be **unambiguous**. I have seen the image proposed for the irradiated food label, and I find it to be quite deceptive. It looks like a little happy flower icon, which is great for the industry but not so useful to the buying public.

The icon doesn't need to be the international nuclear hazard warning. That would be clearly inappropriate. But it also shouldn't be a little piece of propaganda, which is what the chosen symbol is. Why not pick a neutral but prominent icon; something like a square with diagonal stripes or some such. It would be easy to see, unique in the store, and once the public was told what it meant, obvious. It would not be either negative or positive, and would not try to fool the public. **We don't need to be fooled.**

What I see happening here is similar to what the FCC allows for educational TV. There is a standard set up, which on its face is neutral, and then the industry is allowed to come in and circumvent the stated purpose of the regulation with slick advertising methods. For TV they show the same old crap and toss in a 30 second sound bite at the end and call it education. For food irradiation the industry wants to put a nice big happy face type logo on the package and say they have met the requirement. That would be deceptive!

The reason that I think the public needs to be able to make an informed choice on this issue is that the health effects of food irradiation are not clearly delineated yet. It is probably true that there have been no acute health hazards associated with the technology. And the food itself does not become radioactive. But there might be chronic somatic or other health effects from long term human exposure to the food products that have been irradiated, and the public deserves to be able to decide for themselves whether they want to use them and take that possible risk. **And being aware of the possible risk, the public can then expect a cost savings to offset that risk. Since the public is going to be the guinea pig over the long term, and there are savings to be realized, the public should be in a position to benefit. Without proper labeling, the savings will be converted to profits for the companies, and the public will be taking the risk for no gain to themselves.**

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It is very similar to the case of rBGH labeling on milk. On the one hand there are people looking to make large amounts of money using the new technology. On the other hand is the public that is going to be expected to provide the money. If the technology is as good as the advocates say, they will be able to convince the public that the lower prices that they can provide outweigh some nebulous risk. But we, the public, need to be able to see which products are using the new technologies, pay a lower price for them (that is why they are being touted), and make the decision to use the product for ourselves.

I am looking forward to hearing your views on this issue. Please send correspondence to me at the address below.

Yours,



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