

**Harry F. Hull, M.D.**

1140 St. Dennis Ct.  
Saint Paul, MN 55116  
651-695-8114  
3 April 2008

Dr. Richard A. Raymond, MD  
Under Secretary for Food Safety  
Food Safety and Inspection Service  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Dr. Raymond:

I am unable to attend the upcoming hearing on E. coli O157:H7 problem and wish to submit this letter as part of the public comments for the hearing. I request that it be read into the record at the hearing.

I am a pediatrician who has worked for more than 30 years as a public health official responsible for the control of infectious diseases. During my career, I have served as the state epidemiologist for New Mexico and Minnesota and was responsible for the investigation of many outbreaks of E. coli related disease. During my pediatric training, I cared for a 7-old girl who died of hemolytic uremic syndrome from E. coli. So I am witness to the impact that E. coli O157:H7 has had and continues to have both on the public's health and the health of individual children.

The USDA and beef producers have made concerted efforts to control the E. coli problem in ground beef. Significant progress has been made, with contamination levels falling to 0.17% in recent years. However, that progress was reversed last year with contamination rates rising by a third to 0.24%. Simply put, at the present time, 1 in every 400 pounds of ground beef contains potentially deadly E. coli bacteria.

Although thorough cooking and good food handling practices should eliminate the risk of food borne disease, the fact remains that many consumers and some restaurants do not comply with these recommendations. As a result, both sporadic cases and outbreaks of E. coli related disease continue to occur. E. coli infections can produce Hemolytic Uremic Syndrome causing loss of kidney function, with resultant need for dialysis. Some children will die; others will need a kidney transplant.

The current approach of USDA and producers emphasizes better sanitation, chemical treatments, preventing sick animals from entering the human food chain and increased testing. While these approaches are important and will reduce E. coli contamination, they cannot eliminate all E. coli contamination. Given the potentially disastrous consequences

of eating just one hamburger contaminated with E. coli, the only level of contamination that is acceptable is 0. This is what the American people expect and deserve.

The technology to reach that zero level of contamination is already available, but is little used. That technology is irradiation. This process is safe, effective and inexpensive and already approved by USDA for ground beef. A number of forward thinking producers and marketers – Schwan's, Omaha Steaks and Wegman's markets – are selling irradiated ground beef and it is selling well. I understand that some major restaurant chains are considering irradiating ground beef and produce.

I urge the USDA and its sister agency, the FDA, to promote the expanded use of irradiation to protect the safety of America's food supply. To that end, I recommend that you take the following steps:

1. Require that all ground beef intended to be sold as uncooked product to consumers, restaurants and food service companies be irradiated.
2. Adopt labeling standards similar to those being considered by FDA that will permit irradiated food to be labeled as pasteurized.
3. Approve the ready-to-eat petition that has been pending for years.
4. Conduct a public information campaign on the safety and benefits of irradiation to proactively respond to disinformation alleging that irradiation is hazardous.

Irradiation has the potential to drastically improve the safety of our food supply. I strongly encourage you to do all that you can to promote irradiation to protect Americans from food borne disease.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Harry F. Hull". The signature is fluid and cursive, with a large initial "H" and "F".

Harry F. Hull, M.D.