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11/15/00

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

RE: Docket No. 99F-2673

To whom it may concern:

I am writing as a consumer of sprouts and a former producer of sprouts on a commercial basis. We have been in the business of growing sprouts for almost 20 years. We have always grown organically. We object very strongly to the FDA approval of irradiation for sprouting seeds and ask that the FDA reconsider its decision.

While we consider the decision wrong at all levels, we must point out that the FDA is wrong in fact about labeling. The Docket states that sprouts grown from irradiated seeds will not be required to be labeled because the irradiated article is not what is "generally" eaten. This is wrong on the face of it.

Probably the vast majority of sprouts consumed in the world and the US are bean sprouts, it is very clear that the bean will be irradiated and that the bean is then consumed. In fact most all sprouts have at least some portion of the original seed, that would have been irradiated, remaining when they are consumed. Therefore the sprouts grown from irradiated seed must be labeled as required for any product that has been directly irradiated.

Sincerely,

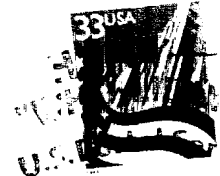


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