

ISGA
International
Sprout Growers
Association



International Sprout Growers Association
471 So. Teilman Avenue, Fresno, CA 93706-13 15
Tel: 559-264-2745 Fax: 559-266-4046 www.isga-sprouts.org

April 16, 2001

Dockets Management Branch
(HFA-305)
Food & Drug Administration
530 Fishers Lane, Rm 1061
Rockville, MD 20852

REC. Docket No. 99F-2673

Irradiation in the Production, Processing and Handling of Food.

Hearing Request

Enclosed is a letter describing the reasons for the requested hearing. I am enclosing three copies of this request as well as three copies of the letter stating my objections to the above named docket.

The specific section of the Docket upon which I am requesting a hearing is:

III. Labeling,

B. Sprouts Grown From Irradiated Seeds for Sprouting.

Sincerely,

A handwritten signature in black ink, appearing to read "J. R. Louie".

JAY R. LOUIE, President

99F-2673

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This new regulation allows for the irradiation of seed for sprouting, but does not require a statement on the sprout packaging to the effect that the seed has been irradiated.

It is the position of the International Sprout Growers Association that this regulation is potentially hugely damaging to our industry.

The consumers of our products are still largely "health food" oriented people who are eating sprouts for the nutritional benefits of the food. Demographically, these same consumers tend to be the people who are averse to any form of irradiation of food. When word gets out that the seeds from which the sprouts are made may be irradiated and they will have no way of knowing which ones have been and which ones have not been, the level of trust in the product will inevitably drop. This could cost the industry millions of dollars in lost sales.

It is our opinion that the level of trust in the regulatory decisions of the FDA will also drop. Consumers who dislike irradiation, for whatever reason, are adamant that they have a right to know which foods have been treated. It is unlikely that these consumers will want to stop eating a food that they value. They have the right to know that the sprouts they are buying have not been manufactured from irradiated seeds.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Louie", written in a cursive style.

Jay Louie, President

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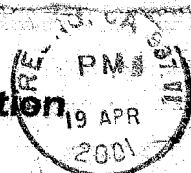
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