

U.S. Food and Drug Administration  
Dockets Management Branch  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

8203 '01 MAY -4 AIO :21

Re: Docket#98N-1038

April 12, 2001

I am writing to express my concern about the possible weakening or elimination of labeling regulations for irradiated food, currently being considered by the Food and Drug Administration. This threatens the consumers' right to know when the food they purchase and consume has been treated with radiation.

Although supporters state that irradiation will make food safer, no one really knows the health impacts of eating irradiated food. We do know that exposing food to radiation disrupts cells and destroys vitamins and minerals that are essential to complete nutrition. Irradiation also deactivates the enzymes in fresh foods that are vital for optimal digestion and metabolism. Scientists have no idea what result this will have on human health. There have been no studies on humans longer than 15 weeks. Animal studies have shown many health effects, such as tumors, kidney failure, death of offspring and miscarriages. Other evidence indicates that chromosomal damage will occur as the result of consuming irradiated food.

The free radicals caused by the "ionizing radiation" ricochet through the food and damage the DNA in bacteria, insects and the food itself. Microwaves do not affect food the same way as irradiation. Microwaving cooks food by heating the water in the molecules, not by damaging the DNA.

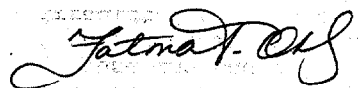
Irradiation does not kill all the bacteria in food. Viruses and the bacteria that cause botulism are not killed by irradiation. Aflatoxin, a highly carcinogenic substance produced by molds, appears in greater quantities in irradiated food, because the bacteria that normally crowd it out have been killed. Bacon, approved for irradiation in 1963, had the approval rescinded in 1968 because animals fed irradiated bacon showed adverse health effects. Irradiation will not reduce the use of chemicals on food because it is applied after harvest. The effect of irradiation on complex chemicals such as pesticides in food has not been studied.

The food industry has been pushing irradiation to save the image of meat products after massive contaminations by E. coli in ground meat, Salmonella in chickens, and Listeria in refrigerated deli meats. Food poisoning from meat and poultry is primarily caused by fecal contamination. Clean up the food industry instead of using irradiation as a quick fix for poor sanitation. I don't agree with any excuse that puts more feces into my food.

Because irradiated foods have not been proven safe for human health in the long term, prominent, conspicuous and truthful labels are necessary for all irradiated foods. Use of a friendly euphemism, such as "electronic pasteurization" or "cold pasteurization" misleads the public into thinking no radiation is involved. Because we associate pasteurization with milk, we think of it as a safe and necessary process. This gives irradiation an aura of safety and stability that it does not deserve.

We must not rush to accept food irradiation as the solution to our food contamination problems. Instead of weakening or eliminating labeling requirements, the FDA should strengthen them. Please support the consumers' right to know by maintaining factual labels on irradiated foods: "treated with radiation."

Sincerely,

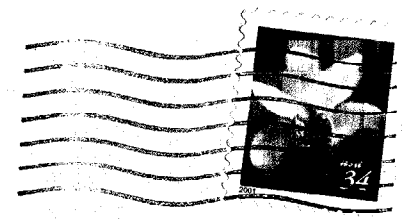


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