

July 3, 2007

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

Re: Docket # 2005N-0272

Dear Commissioner von Eschenbach,

We represent consumer, food safety, farm, environmental, and animal welfare groups. Our organizations believe that consumers have a right to know if their food has been irradiated and **we oppose the changes to current rules for labeling irradiated food** being considered by your agency.

Irradiation is a technology that has been surrounded by controversy since it was first legalized more than 40 years ago. American consumers have developed a deep, fundamental suspicion of eating food that has been exposed to high doses of ionizing radiation. But for years, the food irradiation industry has been trying to lure consumers into buying their product by co-opting the word “pasteurization” to describe their process.

Irradiation and pasteurization are two separate and unique processes, and consumers deserve accurate labeling that allows them to distinguish between them. Consumer data has repeatedly shown that consumers prefer the current labeling requirements of irradiated food. In 2001, your agency conducted focus groups of consumers on this issue. Consumers participating unanimously rejected replacing the term irradiation with pasteurization and reacted with phrases such as “sneaky”, “deceptive”, and “trying to fool us.”

We strongly oppose the proposed rule to allow the use of the word “pasteurization” or other alternate terms on irradiated food or waive the labeling requirement for some types of irradiated food altogether. The current rules for irradiation labeling should be preserved so that consumers receive accurate information about how their food is produced.

Sincerely,

**Masae Wada, Shufurengokai**

**Yoko Tomiyama, Consumers Union of Japan**

**Eriko Hida, Zenkoku Chiiki Fujin Dantai Renrakukai**

**Dr. Hiroshi Satomi, Food Irradiation Network-Japan (since 1988)  
and Co-President, No-Irradiated Food Alliance Japan\***

\*Organized in June of 2006 by Consumer, Environment,  
Organic Agriculture, Women and other citizen groups in Japan