

April 17, 2003

Mr. Eric Bost, Under Secretary  
Food, Nutrition, and Consumer Services  
United States Department of Agriculture  
240-E Whitten Building  
12<sup>th</sup> Street and Jefferson Drive, S.W.  
Washington, DC 20250

Dear Under Secretary Bost:

We are writing, once again, to critique the manner in which the Minnesota irradiation “education” project is being administered. We would also like to note that we have yet to receive a response from you to our March 18, 2003 letter on this same matter.

Since our March 18 letter to you, we have received information directly from the Minnesota Department of Children, Families and Learning (CFL) on the “education” project that confirmed our initial concerns about the objectivity of this project.

On March 18, we received from CFL the results of the surveys the department conducted in the three school districts participating in the “education project.” The methodology for these surveys left much to be desired. First, there was a disproportionate response from school staff to the surveys. The surveys elicited responses from 735 “teachers and staff” and only 150 from parents. Second, there was no delineation among what categories of staff responded – how many teachers; how much teachers aides; how many food service personnel; how many clerical support employees. Third, there was no breakdown provided for the responses by school district. Fourth, school staff was self-nominated for participation – they voluntarily participated by filling out the survey on the internet; consequently, there was no scientific sampling conducted. Fifth, there was no description of the sampling technique or outreach methods used to survey the parents.

On April 10, 2003, we received a packet of information that was produced by CFL for the parents in the three school districts. As you will recall at the March 11, 2003 meeting that you convened, a number of the consumer groups expressed their concerns that the material furnished parents be balanced. One consumer group explicitly asked whether the research from the German-French research consortium on the possible carcinogenic effects of consuming chemicals produced when certain foods are irradiated would be made available to parents.<sup>1</sup> A representative from the same consumer group asked whether the recent Brazilian study on the formation of trans-fatty acids in irradiated ground beef would be made available to parents.<sup>2</sup> The response to both of those questions from Mary Begalle of the Minnesota CFL was that the educational materials were still being developed. You stated that you wanted to see the education project done “right.”

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<sup>1</sup> <http://www.iaea.or.at/icgfi/documents/summary-press.pdf>

<sup>2</sup> <http://www.citizen.org/documents/transfattyacid.pdf>

The “education” material produced by Minnesota CFL and being distributed to parents in Spring Lake Park, Willmar and Sauk Rapids are factually incorrect in a number of areas. We would like to point out the errors in the brochures being distributed.

**Brochure entitled: “Project Introduction”**

- 1) **Fallacy:** Under Purpose of Grant – “The grant is for educational purposes only. It is not intended to promote or encourage schools to use irradiated ground beef.”

**FACT:** The goal of this project is very clear. According to the September 30, 2002 project proposal which USDA funded, it states: “A successful outcome of the educational campaign will be the acceptance and introduction of irradiated ground beef by select school districts.”<sup>3</sup> It is very obvious from the “education” materials generated so far that this is nothing more than an irradiation promotion program.

**Brochure entitled: “Basic Information”**

- 1) **Fallacy:** “Irradiation, like pasteurization, provides a step of protection that is not available by any other means.”

**FACT:** Irradiation is not like pasteurization. The USDA has repeatedly stated that under current dosage limits, no one has proven that irradiation can achieve the same levels of pathogen reduction as thermal pasteurization.<sup>4</sup> Furthermore, there are alternative technologies available that can be used to achieve pathogen reduction in meat and poultry products (e.g., steam pasteurization, hydrostatic pressure).

However, nothing is a substitute for effective sanitation standards and a rigorous food inspection system that keeps contaminated meat from reaching the food supply.

- 2) **Fallacy:** “Irradiation does not significantly change the nutrient value of the food.”

**FACT:** Nothing can be further from the truth. There have been numerous studies that show that when foods are irradiated, there is a substantial reduction in key vitamins.<sup>5</sup>

- 3) **Fallacy:** “There is no evidence of any health risks associated with food irradiation.”

**FACT:** There have been numerous studies that point to the possible detrimental health effects of consuming irradiated foods.<sup>6</sup>

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<sup>3</sup> “Proposal For Food Safety Educational Campaign in Minnesota Schools: Acceptance of Irradiated Ground Beef,” Minnesota Department of Children, Families & Learning, revised September 30, 2002, p. 6.

<sup>4</sup> [http://www.citizen.org/documents/derfler\\_letter.pdf](http://www.citizen.org/documents/derfler_letter.pdf)

<sup>5</sup> <http://www.citizen.org/documents/ACF23B.PDF>

<sup>6</sup> <http://www.citizen.org/documents/questioningirradiation.pdf>

In fact, Dr. Christine Bruhn, a food irradiation educator, has admitted that the Food and Drug Administration has never conducted any research on humans regarding the health effects of consuming irradiated foods.<sup>7</sup>

**4) Fallacy:** “Organizations Not Supporting Food Irradiation” (lists five organizations)

**FACT:** There are over 200 domestic and international organizations that have publicly expressed their opposition to food irradiation.<sup>8</sup>

**Brochure entitled: “Fact Sheet – The Process of Irradiation”**

**1) Fallacy:** “More than 40 years of research suggest that the chemical by-products of irradiation are essentially the same as those produced from cooking or other processing methods, and typically occur in even lower amounts.”

**FACT:** Food irradiation is considered to be a food additive by the Food and Drug Administration because it causes new chemicals to be formed in the food. These new chemicals are called unique radiolytic products (URPs) because they only exist when foods are irradiated. They are not formed from ordinary cooking.

Furthermore, studies conducted on irradiated beef have shown that chemicals that do not naturally exist in beef are formed when beef is exposed to irradiation and some chemicals grow in concentration, such as benzene, a known carcinogen.<sup>9</sup>

**Brochure entitled: “Fact Sheet – Irradiated Food and Long Term Health Effects”**

**1) Fallacy:** “They (people) may think this process increases the risk of cancer. Consuming irradiated food has not been shown to increase the risk of cancer.”

**FACT:** As much as the proponents of irradiation want to believe this, recent research contradicts this assertion. Again, we point to the research conducted by the German-French consortium that served as the basis of the European Parliament’s decision to reject the expansion of the list of foods approved for irradiation in the European Union.<sup>10</sup>

**2) Fallacy:** “Scientific evidence from research studies with animals and human volunteers, and experience with the National Aeronautics & Space Administration (NASA) astronauts, indicated compounds formed during food irradiation pose no unique risk to human beings.”

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<sup>7</sup> “Point Arena, CA School Board Passes Policy Against Accepting Irradiated Foods -- First in Nation Refuses to Accept USDA Dumping Plan,” press release, February 8, 2003.

<sup>8</sup> [http://www.citizen.org/cmep/foodsafety/food\\_irrad/articles.cfm?ID=5352](http://www.citizen.org/cmep/foodsafety/food_irrad/articles.cfm?ID=5352)

<sup>9</sup> “A Broken Record: How the FDA Legalized – and Continues to Legalize – Food Irradiation Without Testing It for Safety,” Public Citizen, October 2000, p. 19.

<sup>10</sup> <http://www.iaea.or.at/icgfi/documents/summary-press.pdf>

**FACT:** The research contradicts this assertion.<sup>11</sup>

Irradiation proponents often hide behind the Space Program to assert the safety of consuming irradiated food. But how much of the astronauts' diet is actually irradiated? What is the longest period any astronaut has consumed a steady diet of irradiated food? Do the astronauts continue to eat irradiated food even after their space missions have ended? NASA's use of irradiated food is not enough to make up for the absence of long-term studies of health impacts of eating irradiated food, especially for children.

3) **Fallacy:** "Irradiation is used to treat mail sent to Congress."

**FACT:** The irradiation of mail may be ending. The United States Postal Service recently announced that it might use anthrax-detection equipment instead of irradiation to process the Federal Government's mail.<sup>12</sup>

Furthermore, there have been problems associated with using irradiation to process the mail, including illnesses suffered by postal and congressional staff who were exposed to the irradiated mail.<sup>13</sup>

#### **Brochure entitled: "Fact Sheet – Nutrition and Irradiated Food"**

1) **Fallacy:** "The energy used to irradiate food is similar to the energy in radio, TV and microwaves."

**FACT:** There are real differences between ionizing radiation (used for irradiation) and non-ionizing radiation (radio, TV, microwaves).<sup>14</sup> The material presented in the Minnesota "education" project is misleading.

2) **Fallacy:** "Food irradiation preserves the flavor and texture of food."

**FACT:** Irradiation can cause food to become unpalatable and there has been research on this issue. The irradiation of foods at high levels can make the food acquire taste, texture and smell that might be unpalatable.<sup>15</sup> In order to achieve the same level of pathogen reduction as traditional pasteurization methods, irradiation could leave the food unfit for consumption. There has been some experience with this problem with the irradiation of mail that contained food products.<sup>16</sup> Furthermore, there have been some at USDA who have raised this issue with irradiated food that could be served in the National School Lunch Program.<sup>17</sup>

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<sup>11</sup> <http://www.citizen.org/documents/questioningirradiation.pdf>

<sup>12</sup> <http://www.washtimes.com/business/20030410-20400616.htm>

<sup>13</sup> [http://www.compliance.gov/reports-studies/irradiatedmail/irradiatedmail\\_07-02.html](http://www.compliance.gov/reports-studies/irradiatedmail/irradiatedmail_07-02.html)

<sup>14</sup> <http://chemed.chem.purdue.edu/genchem/topicreview/bp/ch23/radiation.html>

<sup>15</sup> Ahn, Dong, "Causes and Remedies for Off-Odor Production and Color Changes in Irradiated Meat", presented at Food Irradiation 2002, Westin Park Central, Dallas, Texas, March 25-27, 2002.

<sup>16</sup> Lazar, Kay, "Post Office Gives Up on Germ-zapping Machines", *Boston Herald*, September 24, 2002.

<sup>17</sup> Paidá, Scott, "For Now, County Schools Stick with Regular Beef," *York Daily Record*, February 1, 2003.

Furthermore, there also seems to be some confusion over the reason why the three school districts are participating in the Minnesota “education” program. Representatives at the Minnesota Department of CFL have stated that the three school districts all use fresh ground beef in school lunches and that was the main reason they were selected to participate. The superintendent of the Spring Lake Park School District recently reported at a school board meeting that his school district plans to use pre-cooked ground beef for the 2003-2004 school year. As you will recall, at your March 11 meeting, Bill Hawks, Under Secretary for Marketing and Regulatory Services, stated that if irradiated ground beef products are purchased for the National School Lunch Program in the coming school year, they will be of the frozen beef patty variety. We are perplexed at these inconsistencies and request a clarification from your office.

Mr. Bost, this program is not being done “right” as you wanted. It is not even close to providing balanced information for parents. We have repeatedly heard the call for “sound science” to be used in this debate. Yet, shoddy methodology and outright misrepresentations have marked the Minnesota “education” project. Your office should disassociate itself from this program and demand the return of the \$151,000 in funds that were appropriated to it.

We look forward to your reply to this letter and to the one we sent you on March 18, 2003. Please reply to Wenonah Hauter at Public Citizen, 215 Pennsylvania Ave. SE, Washington DC 20003, (202) 454-5150, whauter@citizen.org.

Sincerely,

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